

# Mr Alec Lauder comments

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

Pratt's Bottom Residents Association considers that there should be a presumption against new development on private residential gardens. Private gardens make a significant contribution to the spatial characteristics of an area and should be recognised and protected for their contribution to amenity, healthy lifestyles, biodiversity and habitat corridors, flood risk management, heritage and character.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

Pratt's Bottom Residents Association considers that the policy results in Bromley Borough's small site target increasing from 352 units per annum to 1029 units per annum and there does appear to be a justification for such an increase. Reference is made to the need for design codes but no advice is given in the supporting text on the status of such codes. Where a design code is not in place the presumption is in favour of approving small housing development unless there is an unacceptable level of harm to residential privacy, heritage assets, biodiversity or a safeguarded land use. Other relevant policies in the Plan (including design policies) should be reflected in Policy H2 to ensure that future development on small sites respects its surroundings and does not adversely impact upon the residential amenity of existing and future occupiers. Clause D, 2) d) specifies that one of the types of small housing development could be the infill development within the curtilage of a house. This could include the development of backland or garden land. The Association strongly objects to the lack of protection for garden land, given the guidance on backland/private garden development in The National Planning Policy Framework. The Association considers that this type of small site development should be assessed in relation to the impact on character, appearance and context of an area, impact on landscaping, natural habitats, play space or amenity space and the residential amenity of future or existing occupiers.

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

Pratt's Bottom Residents Association note that Policy T6 Point A says that "car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity." This is a concern for the Association as there is potential for significant under-provision of car parking. If transport investment fails to materialise, developments will be built with insufficient levels of parking, leading to parking within the new developments and in surrounding roads.

Policy T6 Point H says that “Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1.” This should go beyond PTAL 0-1 and be extended to PTALs 2 and 3. It should be acknowledged that Bromley Borough has a higher car ownership per household than the Outer London average. Wards in the south of the borough, such as Chelsfield & Pratts Bottom, have the highest levels of car ownership at above 1.5 cars per household. Pratt’s Bottom is poorly served by public transport for day to day needs, more so recently with the curtailment of the 402 bus service, which used to link the village to Sevenoaks and Bromley. PTALs do not reflect the accessibility for the journeys that local residents need to undertake to local facilities and services, they are a poor indicator of public transport accessibility for residents in these areas. It should therefore be left open to the Borough Council to decide appropriate levels of private residential parking in such areas.