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NEWSLETTER (4/90) May 27th, 1990

Meeting With Cllr Wilkinson (Thursday, May 24th)

The purpose of this meeting was to discuss the two documents produced by the Society that have been submitted to Bromley and Lewisham Planning Departments and to canvass his support for our ideas in our Report on Local Planning Policies and backing for our draft submission for Conservation of the Area North of Shortlands Village.

It was attended by 4 out of the 5 of the Society's Planning Sub-Committee members. Councillor A.M. Wilkinson is one of the two Ward Councillors for Martins Hill and Town Ward, Bromley and he is Chairman of the Development Control Committee and either chairs or is part of other planning committees.

The first half of the meeting was a natural discussion rather than following an agenda and this set the tone of the meeting. We did not intend a confrontation but more an understanding of the reasons for what we regard as bad planning decisions by Bromley over the past three years. We were also looking to the future to ensure that there were better planning controls so that better planning decisions could be made. The discussion is best summarised as a series of questions and answers directed to Cllr Wilkinson as follows -

Potential Conflict of Interest

Question: As you are very much involved with several planning committees local people feel semi-disenfranchised because you would have a conflict of interests when handling a local planning matter. Do you agree with this and how do you resolve this situation?

Answer: Yes, there does appear to be some conflict of interests. Although I can and do put local residents views, I also have to advise the committees if I believe these are not planning matters or sustainable objections. In this I act no differently than with applications in other parts of the Borough. My fellow committee members would soon spot it if I did not treat all matters in the Borough in an equitable fashion so I cannot make special allowances for my ward. There was one occasion that I actually stood down from the chair of the main committee to express local views, so this is possible.

Question: In which case do you suggest that our efforts should be directed to the other ward councillor (Cllr Hollobone)?

Answer: No, it would obviously help me to understand your points if you forward a copy to me of any response you are making to the planning department in case the points you make are overlooked in the planning officer's report. Certainly, Cllr Hollobone should also be informed and he would be able to represent your views at planning meetings without necessarily putting the opposite view,

i.e. he does not have to put the "planning view", although these are of course the ones that will win the argument. Although he is obviously "new to the game" he has a sharp mind and is his own man regarding making decisions.

Planning Objections

Question: Coming to the planning officer's report, is there any way of ensuring that all the points we wish to make are drawn to the planning committee's attention. The report can be less than one page and cannot hope to convey all the objections. Notably in the case of Oaklands Court, Oaklands Road, there was no mention that next door is a locally listed building - Brabourne Cottage. Also for this site, there was no reference made to previous judgements regarding rear of site parking and garaging made both by Bromley and on appeal by the DoE Inspector at a nearby location at 29a/31 Oaklands Road. Is it possible that someone other than a councillor can make representations to the planning committee?

Answer: No. The way the planning committees operate is largely because of the volume of planning applications. There is much interaction between myself and other councillors and the planning department before the meetings and although items may be missing from the planning officer's report we are aware of the details at the meeting. Of course judgmental mistakes have been made in the past and we are always attempting to improve our performance. We now have a computerised database holding results of planning decisions over the past two years. I welcome the constructive criticism made by groups such as yourselves who are well informed of the planning process.

Planning Decisions

Question: We have perceived a change in Bromley's planning decisions, notably from 1987. Decisions have gone against local opinion when previously this was a prime consideration. Do you agree with this and if so can you explain it? Is there a possibility with the changing directives regarding planning from the government via the DoE that the situation will revert to pre 1987?

Answer: Yes, we were forced to alter our approach to making planning decisions. This was due partly to the DoE Planning Policy Guidance notes which made the presumption for development and demanded that refusals should show that developments would cause demonstrable harm. In addition on its own, local opposition to any proposal is not a ground for the refusal of a planning application that is unless it is founded upon valid planning reasons which can be supported by substantial evidence. Also the DoE stated that planning authorities are not the arbiters of aesthetic taste as regards design. More important was our concern regarding appeal decisions. I have statistics showing that in 1982 Bromley lost only 22% of appeals but in 1987 this had grown to 46%, although our rate for refusing applications was unchanged. Also we were surcharged £30,000 on one appeal. We could not let this situation continue. Hence our approach to the DoE at Bristol where we were badly treated and our representations to other London Boroughs leading to our meeting eighteen months ago with a senior inspector of the DoE attended by representatives of local groups such as yourselves. Since then there have been new

directives from the DoE notably with the appointment of Chris Patten as Secretary of State replacing Nicholas Ridley. This along with the cyclical downturn in the housing market (a drop of some 25% in applications between 1988 and 1989) will hopefully enable us to return to the pre 1987 situation.

Staffing in the Planning Department

Question: We are also concerned about the quality of staff employed in the planning department especially when we enquired recently about the Christ Church extension, a major development in our area, to find that the officer concerned was on day release. Does this imply that reports made to planning committees are made by inexperienced staff?

Answer: No. All planning officer reports are made by senior staff or if not a senior member of the planning department oversees what has been written. We have a highly qualified department even though recently we have suffered the loss of some senior members notably the Chief Architect/Planner, Colin Davis, who is going into private practise.

Question: Can you let us know who will be replacing Mr. Davis?

Answer: Yes. We and I think you will be very pleased that Stuart Macmillan, our current Assistant Chief Planner, has been appointed. Stuart has been an excellent assistant while Colin was doing the "front man's" job. He will become Chief Planner as we have "privatised" the architect's function. Colin Davis has done an excellent job for the Borough. You may note that Bromley's low figure of 8000 additional dwellings in the DoE Strategic Planning Guidance for London between the years 1987 and 2001 was largely due to his efforts.

Development Targets

Question: As you have recorded planning decisions over the past two years on your computer can you let us know how the number of additional dwellings compare with the target and can you compare this on a district by district basis as we feel an undue share has been approved in our area?

Answer: Yes 4,101 additional dwellings have been constructed between 1987 and 1989, which implies we have achieved more than half our target. We have no figures to show how these are distributed within the borough, but you must realise over half the borough is green belt to the south and east and therefore all development must be concentrated in the north and west.

Question: At this rate Bromley will easily exceed the requirement for additional dwellings, you cannot obviously reject plans once this is reached. What do you propose to do when this situation arises?

Answer: I am not sure. Currently with the downturn in the housing market we have no problem and also this relieves the pressure on our planning department especially with the changes occurring there and the requirements to produce the Unitary Development Plan. We will have to face that question if and when it arises.

Unitary Development Plan

Question: Regarding the preparation of the UDP do you envisage changes in your policies regarding densities, especially for sites of less than one acre?

Answer: Yes, I believe we can reduce overall densities from 55-70 to a maximum of 60 habitable rooms per acre. We originally stated the higher figure in the Bromley Plan in order to get approval for the document from the GLC. Now we only have to satisfy the DoE's requirements.

Question: As most developers try to maximise the number of units on a site to the allowable maximum and even try to get away with exceeding it, with reducing the maximum will you allow developers to use the argument of precedence when an adjacent site has a density of 70 hra?

Answer: No, this will not be allowed. Obviously if development has been approved in the previous five or so years for a higher density this will have to be allowed.

Question: We have been thinking of other ways to improve development standards other than density control so as to give teeth to the fine subjective statements in Policy H2 of the Bromley Plan which are very hard to defend. We think that quantifying the amount of amenity space is the key along with existing controls on height (ridge height of neighbouring properties), width (one metre from boundary), front building line and the car parking standards. Amenity space would not include driveways. Would this be considered within the UDP for Bromley?

Answer: This would be very difficult, because how would you define amenity space? Would you include steeply sloping land which is no doubt a visual amenity?

Question: For the majority of sites in the borough steeply sloping land is not a consideration. Curiously enough, another London Borough has provided a definition of amenity space per habitable room depending on the type of development and you may be interested in a copy of some of their policies we have extracted from their draft UDP submission.

Answer: I welcome anything you can provide that will be useful in the production of the UDP. I don't mind borrowing ideas so long as the arguments can be defended.

Question: Picking up the points in our submission on Local Planning Policies that have not been covered, firstly do you approve of "Planning Gain" as we certainly do not think it appropriate in our area?

Answer: No. This is only applicable on major developments and there is always a hidden cost.

Question: There must be amendments to the Bromley Plan, are these available to the public? If so could they be incorporated as an appendix to purchasers of the Bromley Plan and in due course the Unitary Development Plan?

Answer: Yes, there are. For example the change in parking provision for sheltered housing. These are public documents and I will make sure they are readily available. Meanwhile, I suggest you contact the Planning Department if you wish copies (for which there will be a charge).

Question: We felt it important to make a case for change (of the Bromley Plan) early, as we expect only minor changes would occur after public consultation.

Answer: Yes you are right and we appreciate the effort to produce both your submissions. There are not many local groups in the Borough who are so well versed in planning matters as you are.

Locally Listed Buildings

Question: Locally listed buildings do not appear to have much protection from redevelopment as is the case for Brabourne Cottage. What is the value of local listing?

Answer: I agree. Legally we cannot stop a developer demolishing a locally listed building. This question needs further examination. Local listing does highlight certain buildings of merit or historic interest. Perhaps we should pursue statutory listing.

Question: We have already asked English Heritage to consider listing Brabourne Cottage and the two locally listed buildings on Grasmere Road. They turned us down saying that these buildings were unexceptional examples.

Answer: I am obviously behind you in my thought processes. Is there any history associated with these houses?

Question: Not as far as we know, other than they were designed by notable local architects.

London Borough of Barnet's Draft UDP

Question: The other London Borough (Barnet) we mentioned earlier put forward its Policies in much stronger language than the "gentlemanly" approach in the Bromley Plan with statements such as "The Council will not permit development....". Will the Bromley UDP be worded likewise?

Answer: Well we are a more gentlemanly borough and Bromley is a very pleasant place to live in. Work on the UDP is well under way and your submission is early, because the public consultation stage will be later this year.

Local Area Conservation

Question: Switching to the submission on conservation for our area, can you tell us how this was received by the UDP committee meeting recently?

Answer: Well, I have to say that your chances of success are slim and the decision was deferred because your submission was incomplete, but it served as a marker. Even if you are unsuccessful at this stage, you can try again at the public consultation stage of preparing the UDP.

Question: Can you tell us what we need to do to improve our case and win your support to promote our ideas?

Answer: The map you show at the front says a hundred words. Did you intend to include properties on London Road?

Question: No, the line should follow the rear boundary line of these properties. We appreciate the importance of drawing this line accurately. Are there any other points that could improve our submission?

Answer: Most other Areas of Special Residential Character are homogenous, for example Park Langley. That is not true here, but you do have a strong historic case and interesting views. I suggest taking cross-valley photographs to illustrate this point.

Question: As you can see the red line on the map shows the boundary between Lewisham and Bromley, does this cause any difficulty in our submission.

Answer: No, we would only consider what is in Bromley and obviously the boundary has no relevance as far as you are concerned. We will however have to take note of possible boundary changes. In case you are not aware Bromley in its submission to the Boundary Commission has requested a change to include the council properties of Riverpark Gardens and the end of Ravensbourne Avenue and the new boundary to follow the footpath around the Warren Avenue Playing Fields and up the slope including Elstree Hill and the Bromley Court Hotel. We should therefore consider where your line is drawn in relation to these properties. Whatever you include in your proposed area must be able to be defended in the case you are submitting.

Question: We have included two small Conservation Areas within our submission for ASRC status. Is this relevant or should we exclude these?

Answer: Yes include these. They may help to establish your case.

With this rather discouraging reaction to our submission for ASRC status we thanked Councillor Wilkinson for coming to meet us and answer our questions. The meeting was then closed.

Conclusion

On reflection after the meeting we felt that Councillor Wilkinson answered a lot of our concerns over planning issues and we will await the production of the draft Unitary Development Plan for Bromley with interest. We will still proceed with producing the final conservation document after taking advice from Jean Morgan, Bromley Senior Planner and also the reactions from Lewisham Planning Department. Although we regret not having full support from Councillor Wilkinson to promote our case, we will take note of his comments.

Paul Bennett (Secretary)

List of Officers and Road Representatives

Chairman : Paul Sharrock, Shelterdale, Elstree Hill
Secretary: Paul Bennett, 12 Elstree Hill (466-1091)
Treasurer: Alan Marks, 78 Madeira Ave
Planning Officer (Bromley): Bill Jamieson, 7 Bromley Ave
Planning Officer (Lewisham) and Membership Secretary: Paul Bennett
Press Officers: John Ealey, 24 Warren Ave
Newsletter Editor/Meetings Organiser: Peter Pain, 74 Madeira Ave
BR Link/Bromley meetings rep: George Hodson, 20 Ravensbourne Ave

Bromley Ave/Grasmere Rd	Leslie Tucker, 5 Bromley Ave
Calmont Rd/Ashgrove Rd	Mr & Mrs Legg, 39 Madeira Ave
Coniston Rd/Hawkshead Rd/	Marcus Oliver, 137 Coniston Rd and
Oaklands Rd/Spencer Rd	Derek Crussell, 29 Oaklands Rd
Crab Hill/Downs Hill	Barbara Brown, 34 Downs Hill
Elstree Hill/Erin Close/Hillbrow	Carol Davidson, 27 Elstree Hill
Farnaby Rd (1-108)	Mrs McFall, 48 Madeira Ave
Farnaby Rd (109+)	Jo Lightfoot, 136 Farnaby Rd
Madeira Ave	Peter Pain, 74 Madeira Ave
Ravensbourne Ave/	Ann Rowsell, 164 Ravensbourne Ave and
Ravensmead Rd	Steven Westcott, 33 Ravensmead Rd
Warren Ave	John Ealey, 24 Warren Ave

Planning Sub-Committee

Paul Sharrock, Shelterdale, Elstree Hill
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