From: Fawthrop, Simon, Cllr **Sent:** 10 February 2018 15:25

To: Londonplan

Subject: Draft New London Plan (DNLP)

Dear Person,

I am writing to object to the Draft London Plan principally on behalf of my Constituents in the ward of Petts Wood and Knoll within the London Borough of Bromley.

Whilst I have many other objections to the flawed top down, centralised, one size fits all, 18th century thinking of the London Plan, I will concentrate on those issues in relation to the immediate impact upon, the Petts Wood and Knoll ward.

The first is in the potential inclusion of Gardens as Brownfield Land, this goes wholly against the National Planning Framework, which has a presumption against back garden development for many very good reasons from bio diversity, to flood prevention and protecting the amenity value of those gardens.

What this does is it discriminates against those areas which have a low densities, because of the architectural and special standards of the area. In Petts Wood which is an area built on the garden suburb principle a which has protected status as either a Conservation Area or a local designation of an Area of Special Residential Character (Current description attached) a higher standard is expected. This One size fits all policy that anything within 800m of a railway station should have higher densities, flies in the face of the work undertaken by the local Community to set high standards for local development in this area. A visit to the Petts Wood ARSC would demonstrate that this area is the southern equivalent of the Hampstead Garden Suburb, many

studies have been done on the ARSC and it's architectural merits, including the BBC TV Programme *Olden Days* presented by **Ian Hislop** in 2014.

In addition a new Area of Special Residential Character is being created in the Knoll part of the Ward and the same issues would impact this area in relation to both Garden development and special standards.

Such a policy aligned with that of *H1 increasing Housing Supply* 2(a) and *H2 D2* (small sites) making anything within 800m of the railway station fair game for development serious puts at risk this very high standard area. The London Plan must as a minimum make clear that it is subservient to the existing more detailed local plans which define the standards required for development in both Conservation Areas and Areas of Special Residential Character. However Ideally it should remove these top down one size fits all policies as not being sustainable.

In terms of the DNLP

Paragraph 2.0.3 should not apply to Petts Wood and the Knoll his areas does not have potential for intensification over time or for additional housing.

Petts Wood is also listed on page 478 as being a district opportunity Area with medium growth potential. Most of Petts Wood town centre sits within the *Station Square Conservation Area*, so this should not apply as development would mean removing the Conservation Area and this should not be over ridden by the London Plan.

This is again referenced in paragraph 4.2.5 combining 800m with PTALs.

I would very much like to speak with and address the inspector on these issues as a minimum as well as explaining why PTALs are fundamentally flawed.

Regards

Simon Fawthrop

Simon Fawthrop

Councillor for Petts Wood & Knoll Ward

London Borough of Bromley

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1.3 Petts Wood:

The original plans for Petts Wood date from the late 1920s and early 1930s. While Houses were built over a number of years, in a number of similar though varied styles, the road layout and plot sizes were established in an overall pattern. Today the layout remains largely intact. Within the overall area the Conservation Areas of the Chenies and Chislehurst Road already stand out.

The plots were originally designed on the garden suburb principle by developer Basil Scrubby, with large plot sizes spaciously placed. The characteristics of the Petts Wood ASRC include an open feel, predicated by low boundaries and visible front gardens, set back from the road; there is also spaciousness between the houses which is of a superior standard. This allows many of the trees and greenery which prevails throughout the area to be seen from the street scene giving the area its open and semi- rural feel in line with the garden suburb principle. This open and suburban aspect of the area underlines the special characteristic of the area. Development which erodes this principle will be resisted.

The separation between building and the rhythm and pattern of the houses adds to the special character. In many cases there is a much wider separation between houses than in other parts of the Borough which demands a higher degree of separation between buildings to maintain the special character, the openness and feel of the area. Where there are pairs of houses that complement the rhythm of the street scene there is also a prevailing symmetry between the houses. This symmetry can also be seen between neighbouring pairs. The plots are set out in such a way that the spacious character is one of a clear detached and semi-detached nature.

The front building and rear building lines are also of importance in defining the area. The buildings are of a 1930s design which adds to the character of the area. Whilst there have been some changes post war this design aspect of the area remains intact and future development should respect this characteristic. The front roof lines are also of a nature which enhances the characteristic of the area being largely untouched by roof extensions and conversions at the front.

The plot sizes and rear gardens are mostly of a size which is commensurate with the Garden Suburb principle and this characteristic also forms part of the amenity value which makes the area special.

When considering future development within the Petts Wood ASRC, the main focus will be on the impact of any proposed development on the ASRC, taking into account the design and spatial standards including the low density of existing development. Proposals which undermine the character, rhythm, symmetry and spatial standards of the area will be resisted unless very special circumstances can be demonstrated. Likewise new dwellings proposed on gardens and infill will also be strongly resisted unless very special circumstances

can be demonstrated. In this context special is used in the dictionary sense to mean distinguished from others of the same category, because it is in some way superior or held in particular esteem. For a proposal to meet the very special circumstances test in this context would mean not only an enhancement to the ASRC but a consequence of not undertaking the proposal would undermine the Petts Wood ASRC or risk some form of harm to the ASRC.