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FAO: Planning Team (Bromley Council),

We attach this letter as a preface document to our specialist consultant's submission of design, drawings and planning policy compliance in reference to the Self-Build application for Land at the Rear of 14 Highland Road, BR1 4AD.

We have long dreamed of building and designing our own home. Bromley has also long been our desired area to settle. In 2015 the government introduced the **Right to Build** legislation (Self-build and Custom Housebuilding Act 2015) acknowledging that Housing delivery through self-build is an untapped and underrepresented opportunity to deliver much needed house building to **tackle the U.K housing crisis**. Following this, they introduced Right to Build registers as a **statutory duty** / legal requirement for councils to track and **permission** self-build plots. **Both applicants under this application have representation on the Bromley Self Build register and our plan is to design this as our family home.**

We have over 25 years of residential history in Bromley having grown up in the borough and have plenty of family and friends that live in the borough as well. There are two core principles in the **2021-2031 Bromley Corporate strategy** that support the ethos of this project, namely: (1) the borough desires to be a place *'For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home'* and; (2) *'For people to make their homes in Bromley and for business, enterprise and the third sector to prosper'*.

These principles are perfectly represented by our desire to self build. We are actively investing in the area to build our own home and we will call on local trades and services to support in the process, building the local economy. In addition to the latter, we are working to deliver on Bromley housing targets with our own capital. As it stands, **Bromley council have** no plan in place to support this type of housing (based on responses in government disclosure attached with our planning statement). We would hope that our application will pertain substantial weight and consideration to this point. The latter is separate to wider Bromley housing targets which are also proving challenging to deliver and form part of our motivation to self build. **The Housing Strategy for Bromley** published for 2019-2029 does not include anything on self build. The Housing Delivery Test Action Plan published in July 2024 (due to a lack of housing delivery & 5 Year Housing Land Supply "5YHLS") also makes no reference to the Right to Build register and how Self-Build serviced plots will be addressed. In addition, the current Bromley Local Plan despite being published in Jan 2019 (over 3yrs after the Right to Build legislation was adopted) has no housing development policy on self build and the most recent **Housing Delivery Test ranks**

Bromley in the lowest possible ranking at <75% (with a 52% delivery) demonstrating a real need to deliver housing. Failure on housing delivery has real life effects on local young families such as our own.

National Planning policy is clear that **Planning Decisions should apply a presumption in favour of sustainable development**, particularly where there is a HDT <75%, a 5YHLS deficit and/or no local plan policy on a specific housing type (in this case, self-build). **All of which apply in this case.** We would hope the council is willing to proactively support us (as encouraged by government disclosure) to deliver this scheme as a result.

To help address the former points on self build and support future community members seeking the same, we submitted representations to the Regulation 18 consultation for the Bromley 2024 Local Plan which now finally includes an acknowledgement of this type of housing, but still no policy points.

Regarding our scheme, the London Plan is supportive of increased densities and backland development in built up / residential areas, particularly in PTAL 3-6 areas, or sites within 800m of a station or town boundary (London Plan 4.2.4). **Our site meets all of these criteria points.**

Policy H2 states it is explicitly in favour of developing small sites and councils should proactively support this. The **December 2023 NPPF** update goes further to state in **clause 70(b) – councils should seek opportunities through policies and decisions, to support small sites to come forward for community-led development for housing and self build.** Our plot is a small site (as defined in the legislation), is <800m from a train station and is 500m from Bromley town centre (a designated London Plan ‘Opportunity Area’). **The site boundary is in a PTAL 3 location (at the highest) which is one of the highest in the London borough of Bromley.** There is also a residential property on the adjacent plot (No. 10 Madeira Avenue) so we would conclude the principle of development established. NPPF 70(d) states LPA’s should give great weight to the benefits of using sites within existing settlements for homes. **Our scheme works to deliver on the core strategic principles of ‘Good Growth’ in the London Plan – namely: GG2 (Making the best use of land) and GG4 (Delivering the homes Londoners need) – specifically paragraph 1.4.6.**

In terms of design, there was a previous application to build two houses on the site which were not sympathetic to the setting and it was concluded *‘the development as proposed was not supported’* our intention is to build **one** home. A low impact eco-house using modern methods of construction for insulation, energy efficiency and sustainability, designed with an architectural firm that specialise in sensitive construction around arboriculture. The intention is to build something unique, modern, relatively concealed, and **subservient** to the locally listed building in front. It will be **well landscaped** (in line with Backland Policy 3) and integrated with the prominent trees retained on site. Our belief is that a modern building juxtaposed against a heritage building in front brings architectural interest to the site. This is in line with the July 2023 **Bromley Urban Design Guide 5.62 – ‘Junctions’.**

The December 2023 **NPPF** also **encourages councils to seek out this type development under paragraph 212.**

The house will be built to high ecological standards with the **introduction of new biodiversity elements** (despite the biodiversity net gain exemption for self-builds). Our intention is to include elements such as green roofs, ponds, bird boxes, bug hotels etc. There are cases in London where this has been showcased at festivals such as ‘Open House London’ demonstrating progressive, collaborative councils prepared for the future. We have attended some of these ourselves and it has formed part of the inspiration for this project. A meeting was requested to discuss in person as part of our pre-planning application but this was refused as it is only offered for large schemes. We created a scale model as part of the design process and it would have been helpful to talk this through with the relevant planning officer(s).

Our primary attraction to the site was its setting, so the intention here is to preserve and improve it. Our plans include a significant replanting, maintenance, and landscaping plan with ample green cover. The unique design of the neighboring property (No. 10 Madeira Avenue) also demonstrates an established principle for creative contemporary design which we were drawn to.

We have already established previous contact with the Principal Tree Officer(s): Christopher Ryder and Paul Smith with the latter having visited the site alongside us to approve low level clearing of the site, this demonstrates our respect and desire to do everything in accordance with support and approval of the council.

We summarise our case as the following:

1. Self builders with local connection and representation on the **Right to Build** register. Permission for this scheme presents an opportunity to reduce significant housing deficit and demonstrate the council is supportive of self-build, which is a form of affordable housing.
2. London Plan H2 states housing delivery on Small sites should be **proactively** supported by the council to take advantage of the city's finite supply of land. NPPF 70(b) goes further to state councils should **seek opportunities to support self build on small sites specifically**. We are on a Small site (as defined in the legislation) and in a PTAL 3 location which is one of the highest in the London borough of Bromley. The plot is serviced, has low flood risk and is not in a conservation area (or ASRC). This is a prime self-build plot **in a borough with <75% HDT and an existing 5YHLS deficit**.
3. The scheme is a low impact eco-house, well designed and sympathetic to the surroundings with incorporation of biodiversity enhancements (**despite self-build biodiversity net gain exemption**).
4. Our desire to self build a family home is in line with multiple principles in the **Bromley Corporate Strategy 2021-2031**.
5. This development will take a **sustainable** approach to construction demonstrated by our Architect(s) of choice. National Planning policy states Planning Decisions should **apply a presumption in favour of sustainable development**. Our site is adjacent to a line of existing housing and NPPF 70(d) states LPA should give great weight to the benefits of using sites within existing settlements for homes, particularly 'Small Sites' as above. **The project also works to deliver on the strategic principles in the London Plan of 'Good Growth' (GG2 & GG4)**.

We hope the above clearly summaries our desire to sensitively deliver this project in line with consideration of the relevant planning policy points. Thank you for taking the time to read this. Please review our Design & Access Statement, Planning Statement and other Specialist Consultant documents for full details on compliance with planning policy.

Faithfully,

Mr & Mrs Yussuf

References:

1. *Self and Custom Housebuilding Act, 2015*
2. *National Planning Policy Framework, December 2023*
3. *London Plan, 2021*
4. *Bromley Local Plan, 2019*
5. *Bromley Local Plan, 2024 (Reg. 18)*
6. *Bromley Urban Design Guide Supplementary Planning Document, July 2023*
7. *London Borough of Bromley Housing Strategy 2019-2029*

8. *London Borough of Bromley Housing Delivery Test Action Plan, July 2024*
9. *Making Bromley Even Better 2021-2031*
10. *Data Release: Self-build and Custom Housebuilding data 2016 to 2021-2022*
11. *Housing Delivery Test: 2022 Measurement*

