



BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

TELEPHONE: 020 8464 3333

CONTACT: Lisa Thornley
lisa.thornley@bromley.gov.uk

DIRECT LINE: 020 8461 7566

FAX: 020 8290 0608

DATE: 8 November 2011

To: Members of the
DEVELOPMENT CONTROL COMMITTEE

Councillor Peter Dean (Chairman)

Councillor Charles Joel (Vice-Chairman)

Councillors Douglas Auld, Eric Bosshard, Katy Boughey, Lydia Buttinger,
John Canvin, Simon Fawthrop, Peter Fookes, John Ince, Russell Jackson,
Kate Lymer, Mrs Anne Manning, Russell Mellor, Alexa Michael, Richard Scoates and
Pauline Tunncliffe

A meeting of the Development Control Committee will be held at Bromley Civic
Centre on **THURSDAY 17 NOVEMBER 2011 AT 7.30 PM**

MARK BOWEN
Director of Resources

Public speaking on planning application reports is a feature at meetings of the Development Control Committee and Plans Sub-Committees. It is also possible for the public to speak on Contravention Reports and Tree Preservation Orders at Plans Sub-Committees. Members of the public wishing to speak will need to have already written to the Council expressing their view on the particular matter and have indicated their wish to do so to Democratic Services **by no later than 10.00 a.m.** on the working day before the date of the meeting.

The inclusion of public contributions, and their conduct, will be at the discretion of the Chairman. Such contributions will normally be limited to two speakers per proposal, one for and one against, each with three minutes to put their point across.

For further details, please telephone **020 8313 4745**.

A G E N D A

- 1 **APOLOGIES FOR ABSENCE AND NOTIFICATION OF ALTERNATE MEMBERS**
- 2 **DECLARATIONS OF INTEREST**
- 3 **CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 8 SEPTEMBER 2010 AND THE SPECIAL MEETING HELD ON 29 SEPTEMBER 2010 (Pages 1-12)**

- 4 **QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING**

In accordance with the Council's Constitution, questions to this Committee must be received in writing 4 working days before the date of the meeting. Therefore please ensure questions are received by the Democratic Services Team by 5 pm on Friday 11 November 2011.

5 PLANNING REPORTS (Pages 13-30)

Ward	Application Number and Address of Development
Copers Cope	(11/02140/OUT) - Kent County Cricket Ground, Worsley Bridge Road, Beckenham

- 6 ADDRESSING RISING HOMELESSNESS AND HOUSING NEED AND ASSOCIATED BUDGETARY PRESSURES (Pages 31-50)**
- 7 COMMUNITY INFRASTRUCTURE LEVY - CONSULTATION ON DETAILED PROPOSALS AND DRAFT REGULATIONS FOR REFORM (Pages 51-56)**
- 8 NEIGHBOURHOOD PLANNING REGULATIONS CONSULTATION LOCAL PLANNING REGULATIONS (Pages 57-70)**
- 9 CORE STRATEGY ISSUES DOCUMENT - CONSULTATION RESPONSE (Pages 71-126)**
- 10 BIGGIN HILL HERITAGE CENTRE WORKING PARTY - UPDATED TERMS OF REFERENCE (Pages 127-134)**
- 11 MEMBER APPOINTMENT - PLANS SUB-COMMITTEE NO. 1 (Pages 135-138)**
- 12 REPORTS TO NOTE**
 - 12.1 RENEWAL AND RECREATION BUSINESS PLAN 2011/12 (Pages 139-176)**
 - 12.2 PLANNING BUDGET MONITORING 2011/12 (Pages 177-186)**
 - 12.3 PLANNING APPEALS MONITORING REPORT (APRIL-SEPTEMBER 2011) (Pages 187-192)**
 - 12.4 ENFORCEMENT MONITORING REPORT (JULY-SEPTEMBER 2011) (Pages 193-198)**
 - 12.5 DEVELOPING A SUSTAINABLE FRAMEWORK FOR UK AVIATION: SCOPING DOCUMENT (Pages 199-204)**
 - 12.6 UPDATE: PLANNING LEAFLETS AND INFORMATION FOR THE PUBLIC (Pages 205-210)**

.....

DEVELOPMENT CONTROL COMMITTEE

Minutes of the meeting held at 7.30 pm on 8 September 2011

Present:

Councillor Peter Dean (Chairman)
Councillor Charles Joel (Vice-Chairman)
Councillors Douglas Auld, Jane Beckley, Eric Bosshard,
Katy Boughey, John Canvin, Simon Fawthrop, Peter Fookes,
John Ince, Russell Jackson, Kate Lymer, Mrs Anne Manning,
Russell Mellor, Alexa Michael, Richard Scoates and
Pauline Tunncliffe

14 APOLOGIES FOR ABSENCE AND NOTIFICATION OF ALTERNATE MEMBERS

An apology for absence was received from Councillor Lydia Buttinger; Councillor Jane Beckley attended as Councillor Buttinger's alternate.

15 DECLARATIONS OF INTEREST

There were no declarations of interest.

16 CONFIRMATION OF THE MINUTES OF THE MEETINGS HELD ON 18 MAY AND 30 JUNE 2011

RESOLVED that the Minutes of the meetings held on 18 May and 30 June 2011 be confirmed and signed as a true record.

17 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

Development of Biggin Hill Airport

The following question was asked by Ms Andrea Britz, resident of Chislehurst:

“Would you consider that the current level of development at Biggin Hill is in sympathy with the surrounding area?”

In response the Chairman stated that the current development of Biggin Hill had either been the result of planning permission granted by the Council or permitted by the General Permitted Development Order. Any further development which needed permission would be the subject of a planning application. The impact of development would be considered at that time on its merits.

Ms Britz then asked the following supplementary question:-

"I noted that you voted in favour of allowing Biggin Hill Airport to vary the terms and conditions of its lease to run more flights before, during and after the Olympic Games in 2012 when the vote was taken at Full Council earlier in the year. How do you suppose that the infrastructure would cope to allow this increase in the number of flights, either on a temporary or a permanent basis?"

The Chairman informed Ms Britz that the lease was owned by Bromley Council and the resulting impact of any proposal to vary the lease would have been considered by the Council at the time of the application.

18 PLANNING REPORTS

The Committee considered the Chief Planner's report on the following planning application:

1. CRAY VALLEY EAST	(09/03618/FULL1) Composting facility buildings for reception of food and green waste, anaerobic digestion process, digestate maturation process and conversion of methane gas to electricity together with liquid feed tanks, bays/structures to store finished products, biofilter beds, car parking, improvements to existing secondary vehicular access and upgrading of existing hard surfaces (to replace existing open windrow composting facility) at Compost site on land off Cookham Road, Swanley.
---------------------	---

Oral representations in support of the application were made at the meeting by Mr Nigel Cronin, Technical Director of SLR Consulting, an environmental consulting business.

SLR Consulting had provided technical support for the application specifically on air quality, dispersal modelling, noise and alternative site assessments together with advice on highways and landscape.

Since 2001, the site at Cookham Road had provided waste management services to the Borough via a simple small scale composting operation. Since that time, the site had continued to develop as a key asset within Bromley, assisting in the diversion of garden waste from landfill. The current application sought to bring the operation to the forefront of waste technology to enable the treatment of a wider range of organic materials including food waste generated by householders and commercial businesses within the Borough. The proposed technology of Anaerobic Digestion (AD), was the Government's and the UK Environment Agency's preferred solution for treating organic waste and would enable a move away from open windrow composting.

AD technology was entirely self-contained, encompassing tried and tested processing equipment which produced a high quality natural compost product as well as a nutrient rich liquid fertiliser. As part of the proposal, much of what is produced would be utilised by directly adjacent agricultural users. The

process also captured significant volumes of renewable energy in the form of gas which would be converted on site into electricity. This would enable the site to operate self-sufficiently in terms of energy and any surplus energy would be exported to the National Grid.

During the application process, SLR Consulting had engaged with Council Planning Officers, Environmental Health Officers within Bromley, Bexley and Sevenoaks, the Highways Authority and the GLA on a variety of matters including government policy and environmental impacts, in particular, air quality concerns. All parties were fully satisfied by the inclusion of mitigation measures where required in order that all reasonable design and operating measures were incorporated within the application.

There were no objections from any statutory consultee on the proposal and Bromley's Waste Management officers were keen to see such a facility developed within the Borough rather than have to rely on the current 'out of Borough' solution that impacted on travel times, carbon efficiency and costs.

SLR Consultancy were happy to be given the opportunity, via the proposed planning conditions, to enhance the scheme further by discussing landscaping and colour finishes on the main process buildings as suggested within the report's recommendation. This would run in tandem with the required Environmental Permit Application which would add further controls on operational standards (including a detailed Odour and Dust Management Plan), before any operations could commence.

Councillor Michael asked Mr Cronin how far the nearest residential property was situated from the site and also asked him to explain how the development would control air quality and contain odour emissions.

Mr Cronin was unsure of the exact distance of the nearest residential property but estimated that it was at least 200 metres away from the facility so there was unlikely to any detrimental impact on the property. With regard to air quality and odour emissions, Mr Cronin said the design of the buildings included negative air pressure control which was a normal operative procedure. No odour would escape as there would be a suction of air within the building which would then be filtered.

Councillor Ince asked if the surrounding road infrastructure was sufficient enough to cope with an increase in vehicular traffic. Mr Cronin replied that the Highways Agency was satisfied that the small increase in traffic (two vehicles per hour) would have no significant impact on the surrounding roads.

The Chief Planner circulated a layout plan of the development together with elevational drawings. He confirmed that the nearest residential property was located 250 metres from the nearest point of the boundary of the application site.

The following amendment to the Chief Planner's report was noted:-

Under the heading 'Planning History' on page 28, the date stated in the first bulleted paragraph as 'December 2010' should read 'December 2001'.

The Chairman thanked Members for attending visit to the application site which had taken place on 3 September 2011.

Councillor Fawthrop declared this to be a good application and in broad principle believed that the very special circumstances required to develop on Green Belt land had been met. The site was also adequately hidden from view and sheltered. Councillor Fawthrop asked if a condition could be imposed to return the development back to Green Belt land if, in the future, activity were to cease or if new technology became available during the anticipated 25 year life of the development as it currently stood. Councillor Fawthrop moved approval of the development.

In response to Councillor Fawthrop's question, the Chief Planner stated that it was not usual practice to impose such a condition for that length of time however, should the application be approved, officers would be engaged with the site on a regular basis and any such issues would be dealt with as they arise.

Councillor Michael commented that although she was not keen on industrial development on Green Belt land, the site was already being used for waste recycling and was therefore lost as Green Belt land. Councillor Michael stated that the application, together with the conditions attached, was acceptable and seconded the motion for approval.

Councillor Mrs Manning thought the site visit was very useful and reported that the emanating odour was not overwhelmingly strong. With proper controls in place, the recycling of waste was to everyone's advantage. The surrounding residents would also gain by the process being contained inside. Councillor Mrs Manning would like to see the top of the buildings painted with colours that blend in with the surroundings and commented on the need for good landscaping.

Although the application provided sufficient landscaping around the perimeter of the site, Councillor Joel would like to see a little more in the vicinity of the golf course. Councillor Joel requested that a condition be added to ensure that no telecommunication equipment be erected on the site. Councillor Fawthrop agreed with this suggestion.

Councillor Mellor attended the site visit and was impressed with the compactness of the site. Councillor Mellor stated that he was opposed to industrial use of Green Belt land but in this particular instance as the project was initiated by farmers and the site's largest clients would be farmers, he supported the application.

Councillor Bosshard supported the application, stating that although the application was for industrial development, operations would be self-contained. He also commented on the need for adequate landscaping.

RESOLVED that PERMISSION BE GRANTED subject to the direction of the Mayor of London in accordance with powers under the Town and Country Planning (Mayor of London) Order 2008 and subject to the prior completion of a Section 106 agreement relating to source of waste material as recommended, subject to the conditions and informatives set out in the report of the Chief Planner with the addition of a further condition to read:-

'41. No telecommunications equipment shall be installed or placed on the roof of the buildings hereby permitted or the chimneys/flues without the prior approval in writing of the local planning authority.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interests of the appearance of the building and the visual amenities of the area.'

**19 POSSIBLE ARTICLE FOUR DIRECTION AT THE CHENIES,
PETTS WOOD**

Members considered whether an Article 4 Direction should be issued to withdraw permitted development rights for the insertion of roof lights in properties situated within The Chenies conservation area. The recent development of one property had given rise to concerns that an increase in similar proposals could result in potential harm to the conservation area.

The Chairman gave an overview of the options available to Members with regard to the issuing of Article 4 Directions.

Councillor Fawthrop thanked the Chairman and the Chief Planner for bringing this report for Member consideration. Councillor Fawthrop reported that the key issue was that the Chenies was one of the most picturesque roads within a conservation area and should be protected to ensure that it remains so. He therefore moved that a non-immediate Article 4 Direction be sought.

Councillor Auld seconded the motion, commenting that the issue under consideration referred to the Chenies in its entirety, not as individual houses. As the Direction would relate solely to the installation of rooflights, Councillor Auld could see no great difficulty with issuing a non-immediate Article 4 Direction.

Councillors Boughey, Jackson and Michael supported the motion reiterating the need to retain the character of the area.

Councillor Fookes suggested that residents of the Chenies should be consulted. The Chief Planner informed Members that if the recommendation to seek an Article 4 Direction was approved, then residents would be advised and kept informed of proceedings.

RESOLVED that the Executive be requested to consider the issue of a non-immediate Article 4 Direction withdrawing permitted development rights for roof lights in The Chenies, Petts Wood, Conservation Area.

**20 BROMLEY TOWN CENTRE CONSERVATION AREA
STATEMENT**

To complement the implementation of the Bromley Town Centre AAP, a Conservation Area Statement had been prepared which would replace the existing Supplementary Planning Guidance for Bromley Town Centre.

Members were requested to adopt the Conservation Area Statement which had been finalised on completion of a public consultation exercise. A review of the Local List had been carried out and changes were made to the document as set out in Appendix 1 of the report.

Councillor Mrs Manning had taken a keen interest in this project since its implementation but was disappointed to note that the report currently before Members did not contain a copy of the document referred to. Upon obtaining a copy, Councillor Mrs Manning observed that not all of the amendments previously suggested by Members had been incorporated and those that had been incorporated were not highlighted. However, Councillor Mrs Manning was delighted to note the addition of 29 new buildings to the Local List and moved that Members agree with the recommendation in the report.

Councillor Dean seconded the motion.

The Chief Planner noted Councillor Mrs Manning's observations relating to the amended document. He reported that no comments had been received from The Civic Society.

In response to a question from Councillor Fawthrop, the Chief Planner reported that the 29 buildings set out in Appendix 1 of the report were all new entries on the Local List and that no comments had been received from the owners of any of the buildings.

RESOLVED that the representations, subsequent amendments and additions to the Local List be noted and that the Conservation Area Statement be adopted.

**21 CONSULTATION DRAFT NATIONAL PLANNING POLICY
FRAMEWORK**

In July 2011, the Department for Communities and Local Government issued the draft National Planning Policy Framework (NPPF) for consultation. The NPPF would replace up to 1000 pages of existing planning policy.

Members were asked to agree that paragraphs 3.5, 3.6 and Appendix 1 of the report, form the basis of the Council's response which should be agreed by the Chief Planner in consultation with the Chairman of Development Control Committee and submitted by the 17 October deadline.

Councillor Scoates commented that he was frustrated by and disappointed with the NPPF and considered that the proposals would be disastrous for the Green Belt.

Whilst Councillor Scoates was in favour of reducing planning policies to make them clearer for people to understand, a reasonable balance had to be sought between over-regulating every likely possibility and under-regulating with the combination of an appeals service where there was so much ambiguity that neither the applicant, objecting local residents, planning officers or Members would know which way the policies were directing them. Instead of making planning policies localised and assessing the applications in terms of what was best for local communities, it was likely that Members would approve inappropriate applications to avoid paying costs awarded by the Planning Inspectorate.

Councillor Scoates believed that planning would only appear to be localised through the Local Development Framework but would, in fact, be under greater control by the Planning Inspectorate, as highlighted in paragraph 7.3 on page 80 of the report. If Members wished to have 60 pages of ambiguity and true localism, then the Planning Inspectorate should be replaced with a separate appeals committee within the Council.

Councillor Scoates commented that he understood the Government's aims for a presumption in favour of development in inner-City London even though Government should never be permitted to use the planning system as a tool to instigate an economic recovery. Many residents in rural and Green Belt communities were likely to feel deeply betrayed unless adequate Green Belt protection was ensured by applying a clearer variance between the countryside and urban areas.

Councillor Scoates proposed that the Chairman write a letter on behalf of the Committee (to be submitted in conjunction with the consultation document), to remind the government of the vital points he had raised and should seek assurances as to how the Green Belt could be protected in the strictest way possible thereby allowing many of those elected in the Council and Parliament to abide by their political mandates.

Councillor Michael stated that she was happy when the Government amended PPS3 and talk of localism was welcomed however, the NPPF appeared to be saying something entirely different. Councillor Michael agreed with Councillor Scoates on the need to ensure there was good balance between over-regulating and under-regulating and shared his concern regarding presumption in favour of sustainable development (para 2.3) which did not appear to be localism and undermined planning authorities.

Councillor Michael would like to see the response at paragraph 2.4 strengthened in relation to power being taken away from the local authority.

Councillor Michael commented that the responses relating to the Green Belt should be strengthened to emphasise how the Green Belt would become weakened and compromised.

Councillor Mellor was disturbed by the NPPF and believed it to be a contradictory and obscure document. He suggested that Bob Neil MP should be contacted to clarify exactly where Bromley stood as a borough. Members agreed and suggested that all three local MPs should be approached.

Councillor Mrs Manning thought the questions were restrictive and stated that the Authority should go further than merely responding to the questions; she agreed with Councillor Scoates that a letter should be sent from the Chairman or maybe even the Leader of the Council.

Councillor Mrs Manning also stated that everything in the planning system should be kept under review and that she found the current guidance of 1000 pages to be extremely useful. With regard to sustainable development, Councillor Mrs Manning emphasised that it was the current financial situation which was dictating how many houses were being built, not a lack of planning action.

Councillor Jackson supported Members' views with regard to presumption in favour of sustainable development and stated that the South East was densely populated and there was significant immigration into London and this was something the Government needed to tackle.

On a more positive note, Councillor Fawthrop was pleased to note paragraph 5.14 which stated that local car ownership should be taken into account when setting standards for residential and non-residential development and he asked that this be endorsed.

Councillor Joel stated that an application should not be turned down simply on the basis of design however, care should be taken when considering developments within conservation areas.

Councillor Boughey thought the figure quoted for housing provision was misleading and believed that permitted applications should be taken into account instead of planning units which had been completed and built.

With regard to sustainable development, Councillor Ince believed that some planning authorities were likely to ask what it was and how it was defined.

Referring to paragraph 4.3 on page 73, Councillor Fookes wished to know how Community Right to Build Orders would work and who would be liable for the costs of a referendum.

The Chief Planner confirmed that the cost of referendums would be met by the Local Authority.

The Chief Planner commented that the consultation document required one-word 'boxed' answers which the authority would not comply with. Instead, the

comments raised by Members would be incorporated into the draft response document which would be then be submitted, together with the suggested letter from the Chairman.

With regard to page 76 of the report, section 6.1 - the provision of housing, the Chief Planner would seek clarification as to how the quote 20% had been realised as there appeared to be no reasonable justification for such a quote.

It was suggested that a copy of the Chairman's letter be sent to the three local MPs.

RESOLVED that:-

1 Members' endorsed Appendix 1 which, together with paragraphs 3.5 and 3.6 of the report should form the basis of the Council's response to the draft National Planning Policy Framework;

2 the formal response be agreed by the Chief Planner in consultation with the Committee Chairman for submission by 17 October 2011;

3 in addition to the response document, a letter be sent from the Chairman to the Department of Communities and Local Government and copied to the three local MPs, drawing particular attention to the comments raised by Members of DCC at the meeting which covered issues wider than the consultation document itself.

22 REPORTS TO NOTE

The following reports were submitted for information purposes only.

22.1 UPDATE ON PUBLICATION OF LONDON PLAN

Further to the Draft Replacement London Plan EIP Panel Report Summary submitted to the Development Control Committee meeting held on 30 June 2011 (Minute 6, page 6), Members considered an update highlighting the publication of the London Plan on 22 July 2011 and its status as the spatial development strategy for London.

The report also contained the Mayor's response to the EIP Panel's comments with regard to specific policy points raised by Bromley and reported at the Committee meeting in June 2011.

RESOLVED that the publication of the London Plan on 22 July 2011 and the Mayor's response to the EIP Panel's comments with regard to the specific policy points made by Bromley and reported to the Committee in June 2011 be noted.

22.2 LOCAL PLANNING REGULATIONS

Members' attention was drawn to the publication of a consultation document in July 2011, issued by the Department for Communities and Local Government relating to Local Planning Regulations. The document proposed revisions to regulations governing the process by which local councils prepare development plans in response to anticipated reforms of the Localism Bill.

Bromley would not respond individually to the consultation but would, where appropriate, contribute to the London Councils' response which would need to be submitted by 7 October 2011. It was anticipated that the Government would respond to the consultation by 1 November 2011.

RESOLVED that the publication of the suggested changes to the Local Planning Regulations by the Government be noted.

The meeting ended at 8.45 pm

Chairman

DEVELOPMENT CONTROL COMMITTEE

Minutes of the meeting held at 6.30 pm on 29 September 2011

Present:

Councillor Charles Joel (Vice-Chairman)
Councillors Douglas Auld, Katy Boughey, Lydia Buttinger,
John Canvin, John Ince, Mrs Anne Manning, Russell Mellor,
Alexa Michael, Richard Scoates and Pauline Tunnicliffe

23 APOLOGIES FOR ABSENCE AND NOTIFICATION OF ALTERNATE MEMBERS

Apologies for absence were received from Councillors Eric Bosshard, Peter Dean and Peter Fookes. Councillor Charles Joel as Vice-Chairman took the chair.

24 DECLARATIONS OF INTEREST

There were no declarations of interest.

25 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

No questions had been received.

26 PROPOSED STOPPING UP OF HIGHWAY AT BAPCHILD PLACE, HARBLEDOWN PLACE AND LAND ADJACENT TO 97 HIGH STREET, ST MARY CRAY - S247 TOWN AND COUNTRY PLANNING ACT 1990

Report RES1113 & ES11080

At their meeting on 19th July the Environment PDS Committee considered a report concerning authorisation for the making of a highway stopping up order under the provisions of section 247 of the Town and Country Planning Act 1990 to enable the development of the sites of Alkham and Horton Towers and land adjacent to 97 High Street, St Mary Cray to be implemented.

Following the PDS Committee meeting, the Environment Portfolio Holder had indicated his support for the proposal and referred the matter to the Development Control Committee for decision as the matter was a non-executive function. The Environment Executive Assistant, Councillor Peter Fortune, who was also a ward Councillor, had joined the Portfolio Holder in supporting the development.

The Committee noted that planning permission for the development had been granted, subject to a legal agreement, by Plans Sub-Committee No. 1 on 14th April 2011. Members stressed that the legal agreement needed to be completed before development proceeded, and it was confirmed that the agreement was expected to be signed in the next few days.

RESOLVED that, subject to the grant of planning permission pursuant to reference 10/03698/FULL1, the Director of Resources be authorised to take the necessary steps to make an order under section 247 of the Town and Country Planning Act 1990 for the extinguishment of highway rights over the areas shown on drawing numbers ESD/10887/1 and ESD/10888/1 appended to Report ES11080 at Appendix A.

The Meeting ended at 6.36 pm

Chairman

Agenda Item 5

Application No : 11/02140/OUT

Ward:
Copers Cope

Address : Kent County Cricket Ground Worsley
Bridge Road Beckenham

OS Grid Ref: E: 537216 N: 170872

Applicant : Kent County Cricket Club

Objections : YES

Description of Development:

3 detached buildings for use as indoor cricket training centre/ multi-function sports/ leisure facility, health and fitness centre and conference centre. Spectator stand for 2000-3000 people. Car parking. All weather/ floodlit pitches. 48 detached houses
OUTLINE

Key designations:

Biggin Hill Safeguarding Birds
Biggin Hill Safeguarding Area
Green Chain
London City Airport Safeguarding
London City Airport Safeguarding Birds
Local Distributor Roads
Metropolitan Open Land

Proposal

Outline planning permission is sought for the development described above. All matters are reserved for subsequent approval and accordingly the layout, appearance and scale of the buildings proposed have yet to be determined, although upper and lower limits of the dimensions of the buildings have been provided. Accesses are indicated to be as described below.

The full details of the proposal are as follows.

Residential element

The proposed residential element of the scheme will comprise 48 detached houses, located against the southern edge of site, adjoining existing residential development on Worsley Bridge Road, Gainsborough Close and Ashfield Close. The dwellings would be a mix of 4 and 5 bedroom units and a maximum of two storeys in height, with some single storey units proposed. A new vehicular access is proposed onto Worsley Bridge Road with a cul-de-sac estate road. It is indicated that the houses would be designed to comply with Lifetime Homes standards. The density of the development would be approx. 23.8 units/ha.

As part of this element, the part of the southern site boundary is proposed to be re-positioned 2m within the site, with this narrow strip of land retained for the benefit of the owners of adjoining properties.

The residential element is submitted to be the 'enabling' development which would part fund the sporting, leisure and conference facilities.

Sports Centre proposal

To the north of the residential part of the site, new all weather pitches are proposed. Beyond this, 3 detached buildings will be sited, which together with a new spectator stand would encircle the main cricket ground. Between these buildings and the Worsley Bridge Road and Copers Cope Road frontages, car parking spaces would be provided (together with an overflow area in reinforced grass).

The buildings would comprise the following:

Building B – Indoor Cricket Academy (2 storey, maximum height 16m, maximum width 45m, maximum depth 52m)

Building C – Health and Fitness Centre (2 storey, maximum height 16m, maximum width 45m, maximum depth 38m)

Building D – Conference Facility (2 storey, maximum height 16m, maximum width 45m, maximum depth 36m)

Building E – Spectator Stand (single storey, open construction, capacity 2000-3000 people)

Remainder of site

The remainder of the site would be retained in its current condition, including the main cricket pitch and existing clubhouse.

The application is accompanied by a Design and Access Statement, which also contains a Transport Assessment as an appendix, and a Statement of Community of Involvement. The Design and Access Statement sets out the Applicant's case in support of the proposed development, including a case for special circumstances, and the potential benefits to the community and the local economy.

An addendum to the Design and Access Statement was received on 18th October 2011, which includes an Energy Strategy, Flood Risk and Surface Water Assessment, Tree Survey and Arboricultural Report, and further details relating to compliance with Secured by Design, external lighting to the all weather pitch, the quality of the residential development, childrens play space, inclusive design, climate change, biodiversity and urban design. This information was submitted following initial concerns expressed by the GLA, TfL and Sport England.

An updated Transport Assessment and an Outline Green Travel Plan were received on 24th October 2011.

An amended site layout plan was also received on 18th October 2011, which indicates an alteration to the car parking layout, to incorporate an area of reinforced grass surface to accommodate overflow parking in the northern corner of the site.

A Planning Statement and a Financial Viability Assessment (submitted confidentially) were also received on 18th October 2011. The main points of the Planning Statement can be summarised as follows:

Overview:

- At present, KCCC play cricket from three locations, including Beckenham, and notwithstanding the high level of support from the community, the Beckenham ground runs at a loss.
- The current lease has expired and KCCC is 'holding over' – unless additional revenue funding can be secured, then the use of the ground by KCCC will cease along with all other uses of the site.
- In conjunction with the freehold owners of the site, Leander Sports and Leisure Ltd ('Leander'), KCCC has reviewed the scope for development at the Beckenham ground with a view to providing additional capital funding to improve the facilities, which can also provide additional revenue support to the Club.
- This scheme includes a new residential development to provide enabling funding, together with new seating, sports and leisure facilities. On the basis that a viable scheme can be secured, KCCC will enter into a new long lease with Leander, and thus ensure the continued long term presence of KCCC at Beckenham and the social and community benefits it brings.
- The scheme represents the optimum scheme from the Club's point of view, providing a source of revenue in tandem with enhanced sporting facilities.
- No affordable housing is proposed, on the basis that this would require further cross-subsidy, thus increasing the amount of enabling development required.
- The application is accompanied by a financial appraisal, which in conjunction with this statement, seeks to further support the case for very special circumstances to allow inappropriate development on Metropolitan Open Land (MOL) and to justify the lack of affordable housing.
- In short, the scheme will secure the continued use of the Beckenham ground by KCCC (being only one of three County standard wickets in London) and the provision of a new indoor facility, a new and enhanced all-weather pitch, conference facilities and a health and leisure club.
- The ambition of KCCC and Leander is to secure the long term use and occupation of the ground by KCCC, and the provision of new and enhanced sporting and associated facilities of benefit to the wider community.

KCCC and Beckenham Today:

At present, the Beckenham Ground provides the following:

- KCCC county matches and Beckenham Festival (full details of County matches and attendance provided as appendix to Planning Statement)
- The ground also includes an astro-turf pitch (can accommodate full size football or hockey pitch), and a grass football pitch which are available for hire, with a second gassed area disused and not laid out (details of the bookings of these facilities also provided as appendix to Planning Statement). This use will cease.
- The grass playing areas have principally been booked/used by Balgowan FC, Dulwich Hamlet FC and to a lesser degree Elite FC. The use of the pitches is limited by weather conditions and the degree of intensity of use that the pitches can sustain. The pitches are managed by KCCC and any revenue received goes to support the overall site. It is not considered that the intensity of the use of these elements can be increased.
- The astro-turf pitch represents a more viable option – existing clubs would continue to be accommodated in the new scheme. The current level of use of the astro-turf facility is limited by the quality of the pitch which is in need of replacement. The new facility will attract a higher level of use and act as a revenue source to support KCCC.

KCCC and Leander have been asked to confirm the point regarding the permanent use of the site as stated the letter to residents dated 6th July 2011.

Financial Performance:

- A financial appraisal has been submitted to accompany the application, which assesses the viability of the existing use and as proposed. The appraisal (submitted confidentially) sets out details of revenue received to date and seeks to demonstrate that the continuation of the existing use is not viable.
- At present, the use continues due to the generous support of benefactors and the freehold owners. There is therefore a need to place the continued use of the site on a sound financial footing to ensure the continuation of KCCC at Beckenham and associated uses in the long term.

Planning Policy Review (overview):

- The development plan confirms the same level of protection to MOL as enjoyed by Green Belt. Accordingly, other than essential development associated with continued sporting use of the site, very special circumstances must be demonstrated. Viability can constitute a very special circumstance, while it is noteworthy that the draft National Planning Policy Framework (NPPF) refers to the provision of 'appropriate' facilities for outdoor sport as exceptional development, rather than 'essential' facilities as is currently the case in policy terms.
- It is acknowledged that the GLA have expressed the view that the all-weather pitch and seating area could be considered appropriate development if the scale is appropriate for the facilities that take place on the site. The other elements proposed, the conference and banqueting centre, the leisure and health club, indoor cricket centre, associated car

parking and the 'enabling' residential element are considered to constitute 'inappropriate development', which appears to be accepted.

Options for development:

It is clear that continued presence of KCCC at Beckenham cannot be secured without additional funding and revenue. Two options can be identified:

- Cease the use of the Beckenham Ground – the current likely course of action, whereby KCCC would not renew the lease and cease all involvement at Beckenham. County matches would be played at St Lawrence Ground in Canterbury and the Nevill Ground in Tunbridge Wells. All use of the soft playing areas and the astro-turf pitches would cease. The only alternative option is to generate additional funding and revenue support by way of enabling development to support the continued use.
- The KCCC Brief – KCCC wish to continue playing at Beckenham, the brief was therefore to enhance the level of facilities with a view to increasing revenue, enabled by residential development to generate the necessary capital injection. The financial appraisal tests the benefits of the scheme proposed; the addendum Design and Access Statement sets out the evolution of the scheme and how the configuration of development was determined.

The proposed scheme:

Proposed elements of proposal are as follows:

- New Seating to provide 2-3000 seats – the attendance levels appended show that this level of attendance is sustainable
- Gym and Leisure – Leander has identified market demand for a 'high-end' sports and leisure facility, which would operate as a private members' club to provide additional revenue to support the continued use of the site.
- Conference and Banqueting – consultation with Members and the community has identified an aspiration for conferencing facilities, as at present LB Bromley is poorly served by conferencing facilities. The KCCC ground provides a destination in its own right, as well as providing further match day marketing and revenue generating opportunities.
- New All Weather Playing Surface: booking information set out as an appendix shows a consistent high level of usage of the astro-turf pitch. The level of revenue generated by the new facility would increase over and above that secured at present.
- Residential Development – identified as the optimum and most likely means of securing additional capital revenue, with the brief of providing the maximum level of revenue with the minimum amount of built development.
- Affordable Housing – not proposed as this would require further cross subsidy to be generated by the private sale residential development, resulting in more development and built form to enable the development.
- Legal Agreement – proposed that KCCC and Leander enter into a legal agreement to provide for the delivery of the scheme, with a limitation placed upon the delivery of the residential element and the leisure club to ensure

implementation of the all-weather pitch, indoor cricket facility and seating, to include the grant of a new long lease to KCCC. In addition, a financial contribution will be made of an agreed amount to fund the enhancement of existing sports pitches in the area.

- Business Plan – the financial appraisal tested the viability of the existing use and the development as proposed, finding that the existing facilities run at a loss, with no profit for KCCC and Leander receiving only nominal rent (indeed supporting the club). The proposed scheme would generate sufficient capital support to fund the implementation of the scheme and sufficient income to provide a market return over the medium to long term, albeit with losses in the short term. The scheme would be unviable without the leisure club and/or the conference facilities as a consequence of the reduction in revenue, while a reduction in the level of residential development (or reduction in the return arising) would result in a shortfall in capital funding. The resultant loan or mortgage would be required to fund the shortfall would so adversely affect cash flow and returns as to render it unviable.

Summary and Conclusions: The Very Special Circumstances Case

- Despite seeking to maximise revenue lettings from the existing pitches at the ground, the KCCC continues to make an annual loss at Beckenham. The use has continued to date due to the generosity of private benefactors and the freehold owner, Leander. This is not a sustainable solution and the use will cease unless additional revenue support can be generated. The application represents a unique opportunity to secure the long-term presence of KCCC at Beckenham and the continued use of the site for sport.
- The application seeks to achieve this by proposing new Indoor Cricket facilities, enhanced all-weather pitch, conference facility and a leisure club, to provide further revenue support to KCCC and to support the continued use of the ground for sporting purposes. The scheme has been the subject of a full financial appraisal which demonstrates that continuation of the existing use is not sustainable and that, the proposed scheme generates a minimal level of return, commensurate with that which can be expected arising from a sports ground.
- Without the enabling development the use of the site will cease.
- If consented, the scheme will secure the continued use of the Beckenham ground by KCCC, being one of only 3 County standard wickets in London; provision of a new indoor cricket facility; provision of a new and enhanced all-weather pitch and provision of conference facilities and Leisure Health Club.

Location

The application site comprises approx. 6.3ha of Metropolitan Open Land (MOL), which fronts Worsley Bridge Road and Copers Cope Road, Beckenham. The site is host to Kent County Cricket Club, which has been established at the ground since 2002. The Club also has grounds at Canterbury (St Lawrence Ground) and Tunbridge Wells (The Nevill Ground).

At present the site is predominantly open in character, with a two storey pavilion building located to the south of the main cricket pitch, which is served by a relatively small car park to the east, accessed from Worsley Bridge Road. To the south is an existing floodlit grass sports pitch, with an all-weather floodlit pitch beyond, and to the west of this is an area indicated as 'unused open land' on the site plan and appears to be slightly overgrown at present, but which appears to have been in use as sports pitches fairly recently.

The immediate surrounding area is mixed in character. Areas to the south, east and north-east are broadly residential in character, excluding the adjacent Worsley Bridge Junior School (designated Urban Open Space) which is located at the junction with Worsley Bridge Road and Brackley Road, while to the west is the adjacent Crystal Palace FC Training Ground (designated MOL), flatted residential accommodation at Gallery House and Pavilion House (and dwellings beyond on the opposite side of Copers Cope Road). To the north-west on the opposite side of Copers Cope Road is the former NatWest sports ground, which is now host to an indoor play centre, a 5-a-side football centre and a gym/leisure centre.

Comments from Local Residents

The owners/occupiers of nearby residential properties were notified of the application by letter, site notices were displayed at various positions around the perimeter of the site and an advert was published in the local press.

A total of 180 responses were received, comprising 122 in support, 55 objections and 3 neither objecting to nor supporting the development.

Comments made in support can be summarised as follows:

- development will encourage KCCC to play additional games at the ground allowing more people to enjoy county cricket in the area
- indoor cricket facility is needed, and would provide coaching facilities for younger players
- development would provide additional employment and benefit local residents
- proposal would provide improved sports facilities in the community
- youth engagement
- new all weather pitch would benefit local hockey clubs
- concern that site will become derelict if application is not successful and KCCC are forced to leave
- proposal would provide much needed family homes in the area.

Objections raised can be summarised as follows:

- proposal would involve development on MOL and no very special circumstances have been demonstrated
- objection in principle to residential development and 'business' uses on MOL
- land should be preserved as open space

- negative impact to Green Chain and Green Chain Walk
- site makes positive contribution to area in current form – proposal would be harmful to visual amenities
- proposal would result in the loss of sports fields (rugby/football pitches), which is contrary to policy which promotes outdoor sport and recreation
- siting of buildings along Worsley Bridge Road frontage would be detrimental to openness of site and amenities of nearby properties, and result in negative visual impact
- increased pollution and harm to the environment
- impact to existing trees on the site
- possibility of flooding in the area
- impact to residential amenities including loss of outlook, loss of view, overlooking, loss of light and noise and disturbance (from both residential and leisure elements of scheme)
- proposed dwellings too close to neighbouring properties
- proposals would result in a loss of value to nearby properties
- various concerns raised relating to increased demand for parking in the area and harm to conditions of road safety as a result of increased traffic (already a problem with nearby Worsley Bridge School)
- proposal would result in an increase in demand for local services, including education and public transport
- demand for leisure facilities insufficient, particularly in view of similar existing facilities in the area
- housing element of scheme is intensive and would result in an overdevelopment
- housing element is not small scale
- objection to absence of affordable housing
- the site is not well used by KCCC and therefore additional facilities are difficult to justify
- no need for permanent spectator stand
- proposal does not secure KCCC's continued future at the site
- previous residential development at the site was supposed to fund the club's long term future at the site
- site is well used by local sporting clubs, including the part of the site marked as 'unused'
- if permission is granted it will be difficult to resist similar proposals elsewhere
- overall footprint of built development on the site (including car parking) is far greater than indicated in the supporting documentation.

Comments were received from the Halcyon Residents Group (representing Gallery House and Pavilion House which are located on Copers Cope Road overlooking the Ground) which can be summarised as follows:

- planning application should be granted as it is an excellent plan and an exciting opportunity to develop a sports facility, and most importantly to keep KCCC at the ground

- the alternative, that Kent and Leander leave the ground, will open up opportunities for the ground to fall into disrepair, inviting unwanted ‘tenants’ which would have a very serious effect on these properties

Comments were received from the Copers Cope Area Residents’ Association, which can be summarised as follows:

- would not object in principle
- special circumstances were previously accepted in relation to the earlier development at the site (clubhouse and apartment blocks) relating to on-going deterioration of site – this must be taken into consideration in this application in this case in light of the possibility of KCCC vacating the site
- should outline permission be granted, would hope that there are safeguards in place to protect the remaining open spaces within the site, which could contribute to a great sporting legacy in the ward
- height, bulk and appearance of buildings must be given close scrutiny at later stage

Comments from Consultees

From the technical Highways perspective, the following concerns are raised:

- single point of access into site for leisure element of scheme is unsatisfactory as it would not be able to accommodate large numbers of vehicles and may be difficult for goods vehicles to use
- insufficient number of parking spaces provided for conference and leisure facilities
- Transport Assessment required
- Travel Plan not sufficient.

Transport for London (TfL) provided initial comments on the application, which raised concerns regarding parking provision, and advised that a revised Transport Assessment would need to be submitted in order to allow the likely impact of the proposal to the strategic transport network to be fully assessed.

Additional information submitted in the form of an updated Transport Assessment and Green Travel Plan seek to address the concerns raised by Highways and TfL. Any further comments in response to this information will be reported at the meeting.

The Environment Agency object to the application on the basis that the FRA submitted does not comply with the requirements of PPS 25 and does not provide a suitable basis for the assessment of flood risks to be made.

The Greater London Authority (GLA) provided a ‘Stage 1’ response, which recommended that the proposal does not comply with the London Plan in that the proposed construction of 48 houses, the indoor cricket training centre/sports hall, health and leisure club and conference facility are inappropriate development for which the applicant must identify ‘very special circumstances’. Those put forward by the applicant are not sufficient to justify the harm to the openness and character

of MOL caused by the inappropriate development, while the proposal would result in the considerable loss of playing fields which is unacceptable. Furthermore, the GLA consider that the design and layout of the scheme is such that the character of the area, which is currently defined by the unobstructed openness of the cricket ground and surrounding playing fields, would be significantly impacted upon. However, the GLA have recommended that the proposal could comply with the London Plan if additional supporting information is provided and the scheme be re-designed to a more compact form to minimise the impact upon the MOL. The applicant has sought to respond to the concerns raised by the GLA and provided a body of further information in support of the application. Any further comments in light of this information will be reported at the meeting.

Sport England submitted an initial holding objection on the grounds of insufficient information, while recognising the importance of KCCC within the local sporting landscape and supporting the plans to increase the sporting offer of the site. Again the applicant has sought to respond to these concerns and provided further information in support of their case, and any further comments will be reported at the meeting.

The Council's Housing division note that the scheme triggers the requirements within policy to provide affordable housing, however no such housing is proposed as part of this scheme, however no justification had been provided. Accordingly a financial viability assessment was sought. At the time of writing a financial viability assessment had been submitted and was in the process of being independently appraised. Any further comments will be reported at the meeting.

With regard to archaeology, English Heritage recommend a standard condition requiring a programme of archaeological work to be submitted/implemented.

The Metropolitan Police Crime Prevention Design Advisor recommended that a 'Secured by Design' condition be imposed on any approval to require certification (rather than seeking to achieve certification).

The Council's in-house drainage advisor requires a standard condition to be imposed requiring details of foul drainage to be provided, and require a petrol interceptor to the outlet of car parking area.

Thames Water advise that the existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development, and therefore recommend that a condition be imposed requiring a study to be carried out to determine the magnitude of any new additional capacity required in the system and a suitable connection point, prior to development commencing.

Planning Considerations

The application falls to be considered against the following policies:

Unitary Development Plan

BE1 Design of New Development

- H1 Housing Supply
- H2 Affordable Housing
- H7 Housing Density and Design
- T2 Assessment of Transport Effects
- T3 Parking
- T18 Road Safety
- NE7 Development and Trees
- G2 Metropolitan Open Land
- G7 South East London Green Chain
- L1 Outdoor Recreation and Leisure
- L6 Playing Fields
- L9 Indoor Recreation and Leisure

The London Plan

- 3.4 Optimising Housing Potential
- 3.5 Quality and Design of Housing Developments
- 3.8 Housing Choice
- 3.11 Affordable Housing Targets
- 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- 3.13 Affordable Housing Thresholds
- 3.19 Sports Facilities
- 5.3 Sustainable Design and Construction
- 5.7 Renewable Energy
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 6.9 Cycling
- 6.13 Parking
- 7.1 Building London's Neighbourhoods and Communities
- 7.3 Designing Out Crime
- 7.4 Local Character
- 7.6 Architecture
- 7.17 Metropolitan Open Land

Planning Policy Statements/Guidance Notes

- PPS 1 Delivering Sustainable Development
- PPG 2 Green Belts
- PPS 3 Housing
- PPS 25 Development and Flood Risk

PPG 17 'Planning for Open Space, Sport and Recreation' advises that careful consideration should be given to any planning applications involving development on playing fields and sets out the requirement (in conjunction with Statutory Instrument 1996 No. 1817) for local planning authorities to consult Sport England about developments that affect land used as playing fields.

Planning History

There is extensive planning history at the site. The following applications are considered to be of relevance to the current proposal:

00/03131/OUT – outline planning permission granted for the demolition of the existing buildings, excluding the façade of the pavilion, and construction of 3 storey development (including façade) comprising 42 flats with car parking spaces, and two storey sports pavilion building with car parking spaces on Worsley Bridge Road frontage. This development was allowed, in part, to enable the site to be brought back into sporting use for Kent County Cricket Club. KCCC's use of the site was safeguarded for a period of 10 years in accordance with the terms of the legal agreement.

Details pursuant to the above permission were approved under ref. 01/02978/DET, and 02/01532/DET.

02/02290/FULL1 – permission granted for formation of earth bund.

03/00719/FULL1 – permission granted for detached single storey building for score board.

07/00779/FULL1 – permission granted for siting of detached scoreboard.

Conclusions

The application site comprises Metropolitan Open Land (MOL) within which there is a presumption in policy terms against inappropriate development, unless very special circumstances can be demonstrated which clearly outweigh the harm by reason of inappropriateness or any other harm.

The existing use of the site is predominantly for outdoor sport and recreation (which is an appropriate use of MOL), operating as a 'satellite' ground for Kent County Cricket Club (KCCC) who play a limited number of county games at the ground each year, as well as providing playing fields and an all-weather pitch which are used by local clubs for football, hockey and cricket, as well as providing significant sporting and community benefits. The applicant submits, however, that the cost of running the ground exceeds any income and consequently that it runs at a loss each year (and has done since 2002), and that these losses can no longer be sustained.

As a consequence of their financial situation, the proposed development has been put forward by KCCC in conjunction with the owners of the ground, in seeking to provide enhanced facilities for county cricket matches in the form of a spectator stand and additional car parking, along with three detached buildings to provide a complementary indoor cricket training centre, together with a health and fitness and centre and conference centre which would provide alternative revenue streams to support the club. In addition, a new all-weather pitch would be provided to replace the existing facility. The proposal would be delivered by way of an 'enabling' development of 48 private houses on part of the site.

Whilst certain elements of the scheme may be considered 'appropriate' development on MOL in the form essential facilities for outdoor sport and recreation, the remainder would constitute 'inappropriate' development and would require the demonstration of very special circumstances to outweigh the harm by reason of inappropriateness (or indeed any other harm) in order to be accepted. Specifically, the spectator stand which would appear to be of a scale appropriate for county cricket matches played at the site, and the all-weather pitch which would replace an existing all-weather facility in need of improvement, would appear to be acceptable development within MOL. Conversely, the indoor cricket centre, conference centre, health and leisure centre and housing development would be 'inappropriate' development.

It will therefore be a case of balancing the benefits of KCCC remaining at the ground, against the harm that would arise to the openness and visual amenities of the MOL as a result of the inappropriate development, having regard to the case for very special circumstances (VSC) set out by the applicant (and detailed at the beginning of this report), in considering whether the proposed development can be acceptable. In addition, Members will need to consider the acceptability of the loss of playing fields, and whether the absence of any affordable housing as part of the residential element of the scheme can be accepted in this case.

In short the VSC case centres on the current financial situation at the ground, and submits that in order for KCCC to remain at the ground alternative revenue streams must be secured to support the continued sporting use of the site. The housing development would effectively fund the rest of the scheme, which would result in enhanced facilities for the ground, and a complementary indoor cricket centre, health/leisure centre and conference centre to provide alternative revenue streams and allow KCCC to remain at the site in the medium to long term. It is submitted that the inappropriate development would facilitate the continued use of the remainder of the site for outdoor sport and recreation including cricket, football and hockey, with the alternative being that KCCC would be forced to leave the ground, resulting in all uses of the site ceasing. The applicant has submitted a financial viability assessment in support of the case for very special circumstances, and to seek to demonstrate that the development proposal would involve the minimum amount of 'enabling' development to allow the proposal to go ahead with a reasonable operating profit, which would secure KCCC's future at the ground. The Council has instructed a consultant to independently audit the financial viability assessment, and further comments will be reported verbally at the meeting.

While the VSC case and the desire for KCCC to remain at the site is noted, the proposed development would result in the loss of just over half of the open space on the site. The residential development of 48 houses and the three detached buildings along the Worsley Bridge Road frontage (together with the areas retained for landscaping and car parking) would fundamentally alter the open character of the site, affecting views into the site and seriously compromising the openness and visual amenities of the MOL. In this case, the harm to the MOL by reason of inappropriateness is compounded by the amount of development and its siting, scale and form. The residential element of the scheme would comprise a relatively low density development of large detached dwellings, which would not represent the optimum amount of 'enabling' development for this sensitive site in terms of its

built form and the degree of site coverage. The three detached buildings for the indoor cricket centre, health and fitness centre and conference centre would be of significant scale and be highly visible along the Worsley Bridge Road frontage, giving rise to a very apparent loss of openness, compromising views into the site and harming the visual amenities of the MOL. Until the viability of the scheme has been audited it is not possible to draw a firm conclusion on whether the VSC case put forward by the applicant would be sufficient to outweigh the harm to the openness and character of the MOL by reason of inappropriateness and other harm, in this case. A verbal update on this will be provided at the meeting.

In addition to the impact to the openness and visual amenities of the MOL, the development would result in the loss of playing fields, including almost half of the existing cricket field, and the grassed area to the west of the existing all-weather pitch. In policy terms it is possible to consider the re-provision of playing fields elsewhere in order to mitigate any loss, and the applicant has indicated that were planning permission to be granted a financial contribution would be put forward as part of a legal agreement to enhance existing sports pitches in the area. However, details of the size and location of these local pitches have not been provided in order to enable an assessment as to how this might mitigate against the loss proposed in this case. Any further comments in respect of this matter will be reported at the meeting.

With regard to the impact of the proposed development to the amenities of neighbouring residents, it is clear that the proposal would alter views into the site as a result of the amount and scale of development proposed. However, assessing this impact as a residential amenity issue (rather than a public amenity issue such as the openness of MOL), it is not considered that the impact of the proposal to views from neighbouring properties could constitute grounds for the refusal of planning permission. Regarding the residential development, this would be located adjacent to a number of existing residential properties on Worsley Bridge Road, Ashfield Close and Gainsborough Close. Again while there would be likely to be a degree of impact to these properties, the indicative separation between them and the proposed dwellings would appear to be reasonable, while it is highly likely that the proposed dwellings could be designed to ensure that no undue overlooking or loss of privacy would arise.

Regarding affordable housing, the Council's policies require 35% provision on housing sites capable of providing 10 or more dwellings. In this case, no affordable housing is proposed as part of the residential element of the scheme on the basis that this would require further cross subsidy to be generated by the private sale residential development, resulting in more development and built form to enable the remainder of the development. The applicant has submitted a financial viability assessment to seek to justify this which, at the time of writing was being independently assessed, and Members will be updated on the findings of this assessment, together with further comments from the Housing division at the meeting.

Concerning the highways aspect of the development, initial feedback from the Council's Highways division raised concerns regarding the parking provision proposed and the point of access for the sports/leisure element of the scheme. TfL

also raised concerns regarding parking provision. The applicant has subsequently submitted a Transport Assessment, and an Outline Green Travel Plan and further comments will be provided at the meeting.

Finally with regard to the impact of the development on flood risk, the application is accompanied by a Flood Risk Assessment (FRA), which has been reviewed by the Environment Agency. However it is advised that the FRA is not sufficient to comply with the requirements of PPS 25, and in the absence of adequate information to enable an assessment of the impact of the development on flood risk the development would be contrary to this policy guidance.

Background papers referred to during production of this report comprise all correspondence on files refs. 00/03131, 01/02978, 02/01532, 02/02290, 03/00719, 07/00779 and 11/02140, excluding exempt information.

RECOMMENDATION: MEMBERS' VIEWS ARE REQUESTED

If Members are minded to grant planning permission, the applicant's supporting statement lists the following matters which would need to be the subject of a legal agreement:

- submission and approval of reserved matters relating to the KCCC uses prior to
- the transfer of the housing land
- construction scheme (including phasing) for KCCC elements of development to be
- submitted prior to the occupation of the first residential dwelling
- indoor cricket facility seating and all weather pitch shall be built before the
- occupation of all dwellings
- lease for KCCC to be for period not less than 20 years, with terms of lease to
- ensure construction of KCCC elements and their operation
- all weather pitches to be made available for hire to the public
- financial contribution to LBB to fund enhancement of sports pitches in the local
- area

It is also suggested that the transfer of the 2m strip of land adjacent to the proposed residential development to adjoining properties be secured by legal agreement.

If Members are minded to refuse permission the following grounds are suggested:

- 1 The proposed indoor cricket centre, health and leisure centre and conference centre, together with the residential development of 48 dwellings would constitute inappropriate development within Metropolitan Open Land by definition, and would seriously harm the openness and visual amenities of this prominent site by reason of the number and size/type of dwellings proposed, the scale and siting of the three detached buildings and the

associated car parking and landscaping areas along the Worsley Bridge Road frontage. No very special circumstances exist to warrant the setting aside of normal policy requirements, and in the absence of which the proposal would be contrary to Policy G2 of the Unitary Development Plan, Policy 7.17 of the London Plan and PPG 2 'Green Belts'.

- 2 The proposed residential development of 48 dwellings does not include affordable housing, and no evidence has been provided to justify the setting aside of normal policy requirements, and in the absence of which the proposal would be contrary to Policies H2 and H3 of the Unitary Development Plan and Policies 3.11 and 3.12 of the London Plan.
- 3 The proposed development would result in the loss of playing fields on the site, and no information has been submitted to demonstrate that this loss can be mitigated by appropriate re-provision elsewhere. The proposal would therefore be contrary to Policy L6 of the Unitary Development Plan, Policy 3.19 of the London Plan and PPG 17 'Planning for Open Space, Sport and Recreation'.
- 4 In the absence of adequate information to enable a suitable assessment of the flood risks associated with the development, the proposed development is contrary to Policy 5.12 of the London Plan and PPS 25 'Development and Flood Risk'.

Application:11/02140/OUT

Address: Kent County Cricket Ground Worsley Bridge Road Beckenham

Proposal: 3 detached buildings for use as indoor cricket training centre/ multi-function sports/ leisure facility, health and fitness centre and conference centre. Spectator stand for 2000-3000 people. Car parking. All weather/ floodlit pitches. 48 detached houses **OUTLINE**



This page is left intentionally blank

Report No.
ACS 11053

London Borough of Bromley

Agenda
Item No.

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

TITLE: ADDRESSING RISING HOMELESSNESS AND HOUSING NEED AND ASSOCIATED BUDGETARY PRESSURES

Contact Officer: David Gibson, Assistant Director (Housing & Residential Services)
Tel: 020 8313 4794 E-mail: david.gibson@bromley.gov.uk

Chief Officer:

Ward: BOROUGHWIDE

1. Reason for report

The appended report was considered by the Adult & Community Services PDS Committee and Portfolio Holder at their meeting on 27th September 2011. The report provides an overview of the current housing market supply and need position within Bromley. The report also outlines the initiatives and direction proposed to seek to address the current mismatch between housing need and supply which is resulting in increased usage and cost of temporary accommodation with associated budgetary pressures.

The appended report details a range of current and proposed initiatives which seek to minimise the use of the more expensive forms of temporary accommodation and thus seek to reduce the projected budget overspend.

The Committee and Portfolio Holder were asked for and provided their views on and support of these initiatives.

Additionally, the PDS Committee and the Portfolio Holder requested that the report be submitted to the Development Control Committee for information in consideration of the Core Strategy on Affordable Housing and the Local Development Framework.

2. **RECOMMENDATIONS**

2.1 Development Control Committee are asked to note the matters raised in the report, the pressures faced by the Council in meeting its statutory housing duties and the general matters raised about the housing market in Bromley. The committee are also asked to consider what actions the Council can take to assist when developing and using its planning policies.

Corporate Policy

Existing policy:

Financial

1. Estimated cost When the report to ACS was written the projections showed a forecast overspend this year of £200k (£305k full year effect) on the Bed & Breakfast budget. Since then numbers in B&B have continued to rise and the latest overspend projection is £283k this year (£450k full year effect).
 2. N/A
 3. Budget head Report relates to entire Housing and Residential Services Division.
 4. Total budget for this head £2,689k latest approved controllable budget
-

Staff

1. Number of staff (current and additional) – This report is in relation to the work of the entire current Housing & Residential Services Division and does not involve any additional staffing
 2. If from existing staff resources, number of staff hours – 72.95 FTE posts
-

Legal

1. Statutory requirement: The work of the Housing Needs Service is governed by a strict legislative framework in relation to homelessness and allocations (The Housing Act 1996, as amended by the Homelessness Act 2002) which sets out the key duties of the Local Housing Authority. This is accompanied by a Statutory Code of Guidance to which all Authorities must have regard in discharging their functions. This includes the statutory provisions in relation to housing duties towards homeless applicants. The Housing Development Team supports the Housing Needs Service and Social Services and other Departments to fulfil the Council's statutory obligations in relation to preventing homelessness and providing housing.
 2. Call-in is not applicable:
-

Customer Impact

Estimated number of users/beneficiaries (current and projected) - 8,000 households on Housing Register with an average of 440 applications received per month. 4000+ households per year approach Housing Advice & Options service of whom around 3,000 face imminent homelessness. During the first half of the current year there has been a 96% increase in the number of households approaching facing imminent homelessness.

1. COMMENTARY

- 1.1** The appended report was considered by the Adult & Community Services PDS Committee and Portfolio Holder at their meeting on 27th September 2011. The report provides an overview of the current housing market supply and need position within Bromley and outlines the initiatives and direction proposed to seek to address the current mismatch between housing need and supply which is resulting in increased usage and cost of temporary accommodation with associated budgetary pressures.
- 1.2** The appended report details a range of current and proposed initiatives which seek to minimise the use of the more expensive forms of temporary accommodation and thus seek to reduce the projected budget overspend.
- 1.3** The Committee and Portfolio Holder were asked for and provided their views on and support of these initiatives. The following recommendations were agreed by the PDS Committee and decisions made by the Portfolio Holder
- a) That the continued strategy and initiatives for 2011/12 to deal with increased pressures on the service and budget as detailed in paragraph 1.18 be agreed.
 - b) That the pursuance of the proposed initiatives and direction as outlined in paragraph 1.19 and in particular the work around seeking use of empty Council buildings as temporary accommodation and the potential for using other forms of temporary accommodation – e.g. mobile homes be approved.
 - c) That the proposals for use of Payment in Lieu funds as detailed in paragraph 1.22 aimed at contributing supply options to help address the issues raised in this report be approved.
 - d) That the ongoing work of Empty homes Officers to contribute to the supply and help address the budget pressures and for the additional financial benefits as per paragraphs 1.26 to 1.28 be supported.
 - e) That the proposal to make a spend to save bid for a person to see through the work on the range of proposals and initiatives on increasing supply to reduce the pressures and spend on Bed & Breakfast accommodation be approved.
 - f) That the proposal to make a bid for LBB capital to ensure sufficient funding for grants to bring empty properties back in to use with the aim of such grants to be in the form of loans to reduce the pressures and spend on Bed & Breakfast accommodation and increase the financial benefit to the Council from the New Homes Bonus be supported.
 - g) That the theme of locating properties in less expensive areas of the Country be included in the strategy.
- 1.4** Additionally, the PDS Committee and the Portfolio Holder requested that the report be submitted to the Development Control Committee for information in consideration of the Core Strategy on Affordable Housing and the Local Development Framework.
- 1.5** The report stated that current trend analysis suggests that the increases in clients and pressure on the service are likely to continue in to the foreseeable future and potentially rise further, particularly when considering future changes to Local Housing Allowance levels (the Housing Benefit cap), mortgage interest rates, household growth, migration – to London as well as outwards from inner London due to changes to the LHA. Meanwhile, the reduction of funding for national mortgage

rescue scheme, will significantly reduce the number of successful homeless preventions via this route in future years.

- 1.6 The report also stated that, as a consequence of the pressures on the service and the difficulties for the Council in obtaining supply, in order to meet the Council's statutory duties to homeless applicants, the numbers of households in temporary accommodation and, in particular nightly paid accommodation placements, have been rising by approximately 15 additional placements each month (total placements 169 households in B&B/NPA on 14th September). This was nearly 100 more than March 2011 and since the meeting the number had continued to increase and stood at just over 200 w/c 24th October 2011. This increase had also resulted in adjustment to the budget forecasting such that, when the report to ACS was written the projections showed a forecast overspend this year of £200k (£305k full year effect) on the Bed & Breakfast budget. Since then numbers in B&B have continued to rise and the latest overspend projection is £283k this year (£450k full year effect).
- 1.7 The report also stated that behind this figure lies the fact that this is also resulting in the placement of families in temporary accommodation well outside the Borough boundaries and thus away from support networks, work, schools, GPs etc.

2. POLICY IMPLICATIONS

- 2.1 The Adult & Community Portfolio Plan contains statements of Council policies and objectives in relation to housing and associated matters along with progress that members expect to make during the financial year and beyond. These are compliant with the statutory framework, within which the service must operate and incorporates both national targets and priorities identified from the findings of review, audits and stakeholder consultation.

3. FINANCIAL IMPLICATIONS

- 3.1 None arising directly from this report to DCC. However, the appended report to ACS contains specific financial implications and matters for the ACS Portfolio Holder and the overall pressures outlined in the appended report are creating a significant overspend in the Bed & Breakfast budget.

4. LEGAL IMPLICATIONS

- 4.1 The Council has a number of statutory obligations in relation to housing as listed on page 3 of this report.
- 4.2 In direct relation to the contents of this report, these include the provision of housing advice and assistance to prevent homelessness or divert from homelessness, assessment of homeless applications, to make temporary and permanent housing provision for those applicants to whom the Council has a statutory rehousing duty, and supporting such households to sustain accommodation.

Non-Applicable Sections:	Personnel
Background Documents: (Access via Contact Officer)	Homelessness Strategy – Sara Bowrey Portfolio Plan 2010/11 – Catriona Ellis Business plan – David Gibson Empty Property Strategy – ACS PDS November 2009

PART 1 - PUBLIC

Decision Maker: **Adult & Community PDS Committee**
Adult & Community Portfolio Holder

Date: **27th September 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

**TITLE: ADDRESSING RISING HOMELESSNESS AND HOUSING
NEED AND ASSOCIATED BUDGETARY PRESSURES**

Contact Officer: Sara Bowrey, Head of Housing Needs and Enforcement Tel: 020 8303 4013
Email:sara.bowrey@bromley.gov.uk,
Kerry O'Driscoll, Head of Housing Development, Home Improvement and
Strategy
Tel: 020 8313 4139 E-mail: kerry.o'driscoll@bromley.gov.uk

Chief Officer: Terry Rich, Director of Adult & Community Services

Ward: BOROUGHWIDE

1. Reason for report

This report provides an overview of the current housing market supply and need position within Bromley and outlines the initiatives and direction proposed to address the current mismatch between housing need and supply which is resulting in increased usage and cost of temporary accommodation with associated budgetary pressures.

The report details a range of current and proposed initiatives which seek to minimise the use of the more expensive forms of temporary accommodation and thus seek to reduce the projected budget overspend.

The Committee and Portfolio Holder are asked for their views on and support of these initiatives and to recognise that Officers are proposing a general direction and set of initiatives all of which will be used in varying degrees as necessary and thus specific outputs in the report are only for indicative purposes. If any significant variation is likely from any specific initiative or expenditure proposals then the Portfolio Holder will be asked to approve these.

2. RECOMMENDATIONS

2.1 The PDS Committee are asked to :-

- a) Note the position with regards to increasing homelessness and falling supply and associated upward pressures on usage and cost of temporary and emergency accommodation required to fulfil the Council's statutory duties.
- b) Consider, comment on and support the current action being taken and future initiatives being investigated and proposed to maximise the supply of accommodation to address the current shortages and associated budgetary pressures.

2.2 The Portfolio Holder is recommended to:

- a) Consider any comments from the PDS Committee.
- b) Agree the continued strategy and initiatives for 2011/12 as detailed in paragraph 1.18 the range of housing duties and needs in Bromley and to deal with increased pressures on the service and budget.
- c) Approve the pursuance of the proposed initiatives and direction as outlined in paragraph 1.19 and in particular the work around seeking use of empty Council buildings as temporary accommodation and the potential for using other forms of temporary accommodation – e.g. mobile homes,
- d) Approve the proposals for use of Payment in Lieu funds as detailed in paragraph 1.22 aimed at contributing supply options to help address the issues raised in this report.
- e) Note and support the ongoing work the Empty homes Officers to contribute to the supply and help address the budget pressures and for the additional financial benefits as per paragraphs 1.26 to 1.28.
- f) Support the proposal to make a spend to save bid for a person to see through the work on the range of proposals and initiatives on increasing supply to reduce the pressures and spend on Bed & Breakfast accommodation;
- g) Support the proposal to make a bid for LBB capital to ensure sufficient funding for grants to bring empty properties back in to use with the aim of such grants to be in the form of loans to reduce the pressures and spend on Bed & Breakfast accommodation and increase the financial benefit to the Council from the New Homes Bonus.

Corporate Policy

Existing policy:

Financial

1. Estimated cost Current projections show a forecast overspend this year of £200k (£305k full year effect) on the Bed & Breakfast budget. All proposals are aimed to reduce the cost pressures and thus contribute to reducing the overspend. Further detail of a range of proposals is in the report
 2. N/A
 3. Budget head Report relates to entire Housing and Residential Services Division.
 4. Total budget for this head £2,689k latest approved controllable budget
-

Staff

1. Number of staff (current and additional) – This report is in relation to the work of the entire current Housing & Residential Services Division and does not involve any additional staffing
 2. If from existing staff resources, number of staff hours – 72.95 FTE posts
-

Legal

1. Statutory requirement: The work of the Housing Needs Service is governed by a strict legislative framework in relation to homelessness and allocations (The Housing Act 1996, as amended by the Homelessness Act 2002) which sets out the key duties of the Local Housing Authority. This is accompanied by a Statutory Code of Guidance to which all Authorities must have regard in discharging their functions. This includes the statutory provisions in relation to housing duties towards homeless applicants. The Housing Development Team supports the Housing Needs Service and Social Services and other Departments to fulfil the Council's statutory obligations in relation to preventing homelessness and providing housing.
 2. Call-in is not applicable:
-

Customer Impact

Estimated number of users/beneficiaries (current and projected) - 8,000 households on Housing Register with an average of 440 applications received per month. 4000+ households per year approach Housing Advice & Options service of whom around 3,000 face imminent homelessness. During the first half of the current year there has been a 96% increase in the number of households approaching facing imminent homelessness.

1. COMMENTARY

Need:

- 1.1 Increased homelessness prevention and housing options work has achieved a year on year reduction in homeless acceptances and temporary accommodation since 2005. However, in line with concerns raised in the annual and half yearly performance reports to this Committee, the latest statistical reports are now showing significant increases across London as demand continues to rise more steeply and access to accommodation slows up. One of the main concerns is the significant increase in the number of households becoming homeless from the private rented sector (PRS), given the reliance on this sector in achieving the previous reductions in homeless applications and reducing usage of temporary accommodation. Meanwhile, changes to Housing Benefit caps for PRS coupled with more households renting privately due to limited ability currently to get a mortgage to purchase has created additional competition for PRS properties and upward pressure on rents making it increasingly difficult for the Council to obtain the necessary level of supply from this sector.
- 1.2 Since the onset of the recession there has been a marked increase in the number of households presenting in housing need and, in particular, those faced with imminent homelessness. This has culminated in a 96% increase in the number of households applying for assistance under the provisions of the homelessness legislation during the first half of 2011, compared to the same period in 2010.
- 1.3 The main reasons for this are increased homelessness as a result of rent or mortgages arrears, family & friends no longer willing/able to accommodate and loss of private rented sector (prs) accommodation.
- 1.4 The service has also witnessed a 300% increase in new housing register applications, mainly as a result of households' concerns about sustaining or accessing accommodation in the current economic climate. The register now totals more than 8,000 households. It is reasonable to say that a number of households currently in the lower bands may in fact face homelessness in forthcoming years especially as their chances of being housed through the register are between slim and nil.
- 1.5 Current trend analysis suggests that these increases are likely to continue in to the foreseeable future and potentially rise further, particularly when considering future changes to Local Housing Allowance levels (the Housing Benefit cap), mortgage interest rates, household growth, migration – to London as well as outwards from inner London due to changes to the LHA. Meanwhile, the reduction of funding for national mortgage rescue scheme, will significantly reduce the number of successful homeless preventions via this route in future years.

Supply:

- 1.6 Supply of accommodation has dropped across all sectors of the housing market as churn and new build development slows up, the Buy to Let market is – at best – static and other factors and services now focus on keeping people in their homes to receive support services rather than moving to institutional settings.
- 1.7 **Social Housing:** There is a marked decrease in the supply of available social housing units. There is less churn in the stock as fewer tenants are able to access alternative housing such as shared ownership. Also fewer new builds are now coming through and this reduction will be even more acute in the next few years. Similarly other services either keep people in their homes or require units to provide services in community rather than institutional settings.
- 1.8 It is now not uncommon to for only 5 or so properties to be advertised in any one week, often with at least 1/3 of these being sheltered accommodation. Hence the supply of family accommodation is limited. A by product of this is a huge increase in number and officer time spent on MP and Members enquiries on behalf of constituents wanting re/housing and in appeals or review requests of their housing register banding

- 1.9** During 2010/11 there were 282 less units available for letting than the predicted supply. Based upon the lettings figures to date for 2011/12, it would appear that supply is likely to drop by a around a further 180 whole year affect. This obviously creates a silting up of temporary accommodation and actual homelessness when accommodation cannot be secured prior to the loss of existing accommodation. Additional concern is that over this period there has been a reasonable level of new supply through work of the Housing Development staff but recent changes in how development is to be funded and provided and a new bidding round for funds has seen no agreements for new developments to start since March.
- 1.10 *Private rented Sector (PRS)*:** Over recent years, critical to the temporary accommodation reduction and homeless prevention work, has been the diversion of households to the PRS. This is now becoming increasingly difficult. The main reasons for this appear to be:
- Landlords finding renting to households from the Council a financially unviable option, in part due to the changes in local housing allowance (LHA), rising costs of maintenance and mortgages
 - Increased competition for private rented accommodation due to difficulty in accessing alternative forms of housing such as owner occupation – effectively pricing low income households out of the market
 - There is also increased concern relating to increased competition from inner London boroughs offering higher incentive levels.
- 1.11** As a result some families prepared to accept PRS as a prevention measure are not being successful and become homeless.
- 1.12 *Temporary Accommodation (TA)*:** The Council's leasing providers, Orchard & Shipman, Hyde & Avenue Lettings are experiencing immense difficulty in acquiring new properties to lease despite aggressive marketing and offers to landlords of the highest rates possible within the new LHA levels. Meanwhile, a number of owners are pulling out due to financial difficulties.

Impact:

- 1.13** Consequently, in order to meet the Council's statutory duties to homeless applicants, temporary accommodation and, in particular nightly paid accommodation placements, have been rising by approximately 15 additional placements each month (total placements 169 households in B&B/NPA on 14th September). This is nearly 100 more than March 2011. Behind this figure lies the fact that this is also resulting in the placement of families in temporary accommodation well outside the Borough boundaries and thus away from support networks, work, schools, GPs etc. Unfortunately it has also resulted in at least one occasion when there was no temporary accommodation found for a family of four. A significant increase in staff time is now taken up in simply seeking temporary accommodation.
- 1.14** Whilst Boroughs work together to try and negotiate agreed payment rates, landlords are pushing up their prices aware of the immense demand for accommodation and legislative rehousing duties incumbent on local authorities meaning that, in nearly all cases, accommodation cannot be secured within LHA subsidy rates resulting in increased costs to the Borough.
- 1.15** This picture, repeated across London, has also resulted in either the unit cost of temporary accommodation rising or the fact that the cheaper units are occupied and thus more expensive units are having to be used..
- 1.16** Also worrying is the lack of available supply on a day to day basis and increasing number of homeless households being held off eg: through extensions to possession orders, staying with family/friends, etc., and risk that accommodation cannot be secured resulting in legal challenges.
- 1.17** The table in Appendix A demonstrates the trend analysis as prevention and housing options work has reduced homeless acceptances and temporary accommodation reliance. The chart demonstrates the volatile position and impact upon TA usage until the end of the current year.

(This does not suggest that the problems will not still exist at the end of the year). Based upon current placement and cost trends this position places an unbudgeted additional budget pressure above LHA subsidy rates of £200K for 2011/12 (£305k Full Year Effect). Other London Boroughs are currently reporting pressures and costs far in excess of the position outlined above for LBB.

Actions being taken proposed initiatives being investigated

1.18 The focus on preventing homelessness and diverting to alternative housing options is thoroughly embedded within the service, witnessed by the success rates last year which directly prevented more than 2,000 households from homelessness and assisted in accessing private rented accommodation for more than 700 households. Officers continue to focus on this area of work to maximise the level of prevention & diversion work to minimise the impact of rising demand. Some specific examples of the work currently being undertaken & implemented are:

- Dedicated mortgage rescue officer and bespoke LBB mortgages rescue scheme to maximise prevention of mortgage repossession
- Dedicated private rented sector advice to Landlords and tenants seeking to minimise the impact of LHA changes and eviction due to rent arrears or non renewal of tenancy due to HB levels no longer meeting the amount of rent charged.
- Stringent monitoring of lettings plan further maximising number of lettings to homeless households
- Close working with private landlords to promote access to this sector and established letting schemes
- New leasing scheme provider – Orchard & Shipman pursuing an aggressive advertising campaign to acquire properties both in & outside of the Borough
- Seeking to secure dedicated nightly paid accommodation – seeking additional options to secure in-borough lower rate accommodation via block booking arrangements.
- Extending short term lodging forms of accommodation, in partnership with the South East London Housing Partnership, for young people.
- Commissioning a sub-regional acquisition programme to assist single homeless in to the private rented sector.
- Work with and funding the Credit union to enable recycling of loans and deposits to maximise level of payments and number assisted whilst also helping households save towards their next deposit.

1.19 Proposed additional initiatives and future direction:

- Working up business cases and viability analysis for the use of vacant LBB or health/PCT properties for use as temporary accommodation – e.g. closed nursing homes and LD campus – note this removes any cost of securing properties but also provides the Council with an income whilst also removing the cost of the current placements in Bed & Breakfast above subsidy,
- Incentives to owners to bring empty homes back in to use in return for nomination rights funded out of monies currently available from sub regional funds and a bid for LBB capital funds – additional financial benefits to the Council through New Homes Bonus – see later in report)
- Reviewing private sector schemes: Increasing incentives and the “offer” to landlords, such as insurance scheme, increasing underwritten risk, support services to intervene in tenant/Landlord problems, etc to increase and retain Landlords willing to let to a household put forward by the Council
- Additional court representation to focus on supporting households facing repossession due to mortgage and rent arrears.
- Exploring the potential to utilise properties subject to probate on a short life basis
- Reviewing Supporting People funded provision and hostels to ensure rehousing and through flow assists in move-on from temporary and emergency accommodation.
- The potential for the provision of more new forms of temporary accommodation such as mobile homes and so on
- Reviewing protocols with RSL’s to seek to minimise any homelessness and loss of accommodation from their tenants

Use of Payment in Lieu Funds

- 1.20** Members will be aware from previous reports that the service has available funds obtained from developers through planning applications/permission which are in lieu of affordable housing being provided on particular sites for a range of reasons. These funds can only be spent on the provision of affordable housing.
- 1.21** At present, there is an uncommitted sum of £1.614m in the account. In addition, there are a number of other PiLs which have been secured under planning obligations but not yet received totalling a definite £2.1m. There are triggers for when payments are to be made but the slow down in the new build market is delaying receipt of these payments. However, it is expected that most should be received in the next couple of years.
- 1.22** Officers are currently appraising the feasibility of a range of uses for the uncommitted PiL. By way of this report, we are asking the Portfolio Holder to agree to the proposed options for use of the funds as detailed below and to the exact amount of PiL allocated to each option to be flexibly allocated as opportunities arise and to obtain the maximum output considered best to reduce TA usage.

a) **Street Acquisitions Programme:** Following the success of the previously approved Temporary to Permanent acquisition programme and the Supported Living Initiative, it is proposed to seek support from our Housing Association partners to use PiL and their funding to acquire existing properties within the Borough. This produces the quickest form of additional supply and thus the quickest impact on the current TA and budget pressures. Based on initial modelling, the table below sets out the approximate grant levels required to provide units of different sizes under this proposal:

	2 beds	3 beds	4 beds
Average grant per unit	£40,000	£45,000	£50,000

The amount can vary depending on cost of any necessary works to a property. However, if £1m of PiL was utilised this could provide approximately 20 to 25 units.

b) **Shared Equity Programme:** Viability and process assessments are being worked on for PiL funds to be used to provide assistance for households who want to buy to gain a foot on the housing ladder via a shared equity scheme – particularly those who can obtain a mortgage but do not have sufficient for the deposit required. This would be administered by a the current Housing Association partner who operated a similar programme in another London Borough for a fee per successful unit. The initial target group would be existing social housing tenants, with the aim of freeing up much needed social housing units, particularly larger family units. PiL would take the form of an equity loan to the purchaser, secured as a second charge on the property, linked to value and with the potential for this to be recycled back on any subsequent sale of the property.

The amount can vary but it would not be intended to provide such an equity loan of more than 15% of market value. Inclusive of an administrative fee and costs it is estimated that £250k could produce around 10 properties. This would be more units and in a much shorter time frame than if an equal amount of the PiL was used for a new build shared ownership development.

Empty Homes Work

- 1.23** There are around 1,000 homes in the Borough that have been empty for more than 6 months. In November 2009 the ACS PDS Committee considered and the Portfolio Holder approved an empty property strategy. This has been a feature of the Divisional and Portfolio plans since and work has been successful in bringing 200 properties back in to use in the last 3½ years.

- 1.24** There have been two full two time Empty Property Officers (EPO's) since 2006. They are funded by a Government grant – via South East London housing Partnership (SELHP). This is only sufficient to cover their salaries until towards the end of 2012/13 financial year. The funding also covers grants and loans to owners of long term empty property. As loans are repaid in future years they are available for further loans. Proposals for future funding and arrangements for the EPOs will be considered and brought back to PDS/Portfolio Holder at the appropriate time.
- 1.25** Where work with owners has included financial assistance (either grant or loans), owners have been required to provide nomination rights to the Council for a period of 5 years.
- 1.26** There are financial benefits of this work to the ACS Portfolio/Dept and also to the wider Council. These take the form of :-
- Increasing the supply of housing available to meet housing need within the borough,
 - Reducing the use and costs of providing temporary accommodation. B&B cost savings of up to £251 per week can be achieved – see Appendix B,
 - Sourcing properties for special needs groups (e.g. Learning Disability supported living, physical disabilities and mental health service users) resulting in avoiding/saving costs of up to a few hundred pounds per week by avoiding the need for residential care placements.
 - Maximising the number of properties for which full Council Tax is collectable. Discounts apply for empty properties.
 - Ensuring the Council Tax register is up to date. It relies on the owner's notification. The EPO's surveyed 570 privately owned properties believed to have been empty for over a year. 21 were found to be occupied.
- 1.27** There is also a further financial benefit of the empty property work is in relation to the New Homes Bonus introduced by the Coalition Government from this financial year. Under the NHB Councils receive the equivalent of the national average CTax Band D (£1,439 in 2011/12) for each new property built in the Borough. However, long term empty homes are part of the formula for calculating increased supply. The October 2009 numbers of empty homes in each Borough were used as the baseline and any increase in numbers reduced the additional supply figure accordingly and any reduction in empty homes increased the figure.
- 1.28** Consequently, of the NHB the Council received to go in to this year's overall Council budget, the work of the EH Officers resulted in £106,342 awarded due to the reduced number of long term empties. As any NHB is received for 6 years this results in a total of £638k. Bromley received the 12th highest amount in London and 10 Boroughs had a negative figure, five between £168k and £586k pa. Thus EH work has an important role to play not only in creating supply that can reduce use of and budget pressures from temporary accommodation but also in the overall Council finances.
- 1.29** A bid has been made to the HCA for capital funding with or through a Housing Association under a new programme the HCA intends to run. This might also provide a source of some revenue towards the cost of the staff but the programme is currently lacking in sufficient detail to know more about the likelihood of this.

2. POLICY IMPLICATIONS

- 2.1** The Adult & Community Portfolio Plan contains statements of Council policies and objectives in relation to housing and associated matters along with progress that members expect to make during the financial year and beyond. These are compliant with the statutory framework, within which the service must operate and incorporates both national targets and priorities identified from the findings of review, audits and stakeholder consultation.

3. FINANCIAL IMPLICATIONS

- 3.1 This report explains what is causing the current budget pressures on the service which are currently estimated to create an overspend of £200k this year (£305k Full Year Effect). The majority of the prevention and options work, plus some of the associated staff are entirely paid for by Government Grant (totalling £650K for 2011/12 including the LHA mitigation fund). It is currently unknown what level of grant, if any, will be received after the end of the financial year. This work is critical to diverting households from temporary accommodation and minimising associated cost to the Council of placements. Without the current level of grant funding most of the prevention work will have to cease which, because it is more cost effective than the use of temporary accommodation, would result in increased unbudgeted expenditure.
- 3.2 It is imperative that further initiatives outlined in this report are pursued in order to help address the pressures on the Council and budgets. However, it must be noted that even with the work currently planned and continued analysis and pursuance of suitable/viable additional options, with these trends now occurring across London, the financial impact and pressure on accommodation is unlikely to be fully negated and will need careful monitoring throughout the remainder of the year.
- 3.3 Project Resource – it is proposed to make a bid for LBB Spend to Save funding to provide officer time over the next few months to carry out all the work associated with the range of proposals in this report. Clearly the quicker outputs from any/all are achieved then the sooner the cost pressures can be reduced.
- 3.4 Appendix B shows the current cost to the Council of the various forms of temporary accommodation used. Clearly it is the use of Bed & Breakfast and Nightly Paid Accommodation which creates the main budget pressures. This Appendix also shows the potential income that could be produced for the Council from use of any of its own accommodation – as well as negating the additional cost to the Council from use of bed & breakfast accommodation.
- 3.5 The proposals for use of Payment in Lieu funds are within the terms of usage of such monies and the funds are within the existing capital programme.
- 3.6 In respect of Empty Homes, as at April 2011 there was £207.5k in loans – funded by Government Grant – for previous EP work that will be repaid over the next 5 years. The table below sets out when this should be repaid. The early loans provided were repayable after 5 years, the current ones (and aim for the future) are repayable at one fifth per year over 5 years. Additional loans mentioned above will add to the future year's figures. Money used to finance the Final EDMO was paid back into the budget in 2010/11 and is included. This money is also available for future grants/loans. A small bid for LBB capital will be made to seek to supplement the funding below and on the basis of the financial benefits to the Council outweighing any cost.

Repayment of Loans

Financial year	2010/11	2011/12	2012/13	2013/14	2014/15	Total
Amount due to be repaid	£59500	£36000	£14000	£44000	£54000	£207500

- 3.7 The table below demonstrates additional NHB achievable from specific action and grants/loans. The works on “auditing” the Council Tax list and visits will also provide financial benefit but this has not been included. The figures are also intended to be conservative.

3.8 As can be seen from Appendix B if 10 of these properties were to be used instead of B&B then

	Year 1	Year2	Year3	Year4	Year5	Year 6
Potential NHB						
60 properties back into use in year 1	86k	86k	86k	86k	86k	86k
.Reducing to 40 additional in year 2		57.5k	57.5k	57.5k	57.5k	57.5k
35 in year 3			50.3k	50.3k	50.3k	50.3k
25 year 4				36k	36k	36k
25 year 5					36k	36k
25 year 6						36k
Total NHB	86k	143.5k	193.8k	229.8k	265.8k	301.8k

this would equate to a weekly reduction in the pressure on the B&B budget of up to £1,273

3.9 A sum of £60k is required for the employment, overhead and operating costs of the two Empty Property Officers. This should be able to be funded for the funds already available to and with the Council though the Government grant until towards the end of 2012/13 financial year. Further funding for the staff may be realised if the bid to the HCA is successful. Once the HCA funding position is clearer a spend to save bid may be made for LBB funding based on the financial benefits to the Council of empty homes work as outlined in this report.

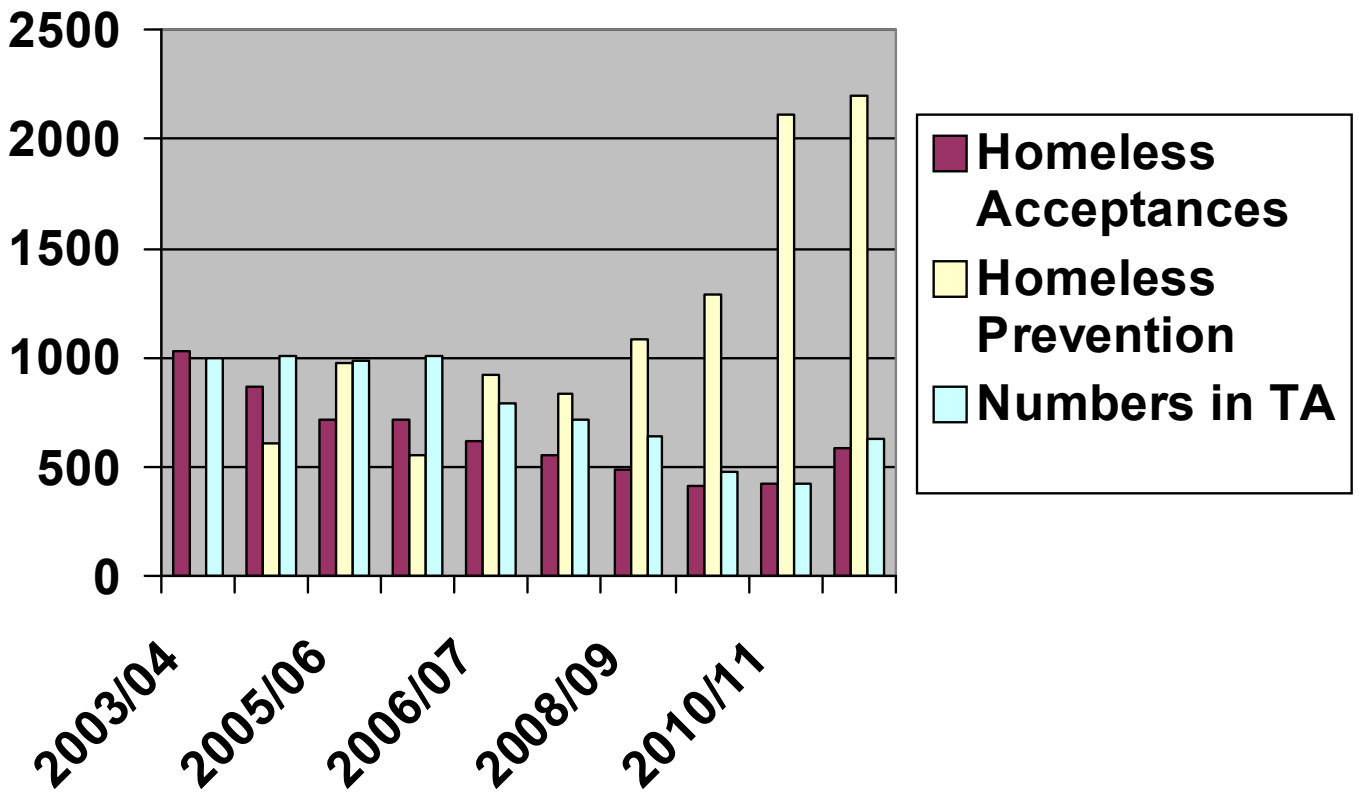
4. LEGAL IMPLICATIONS

4.1 The Council has a number of statutory obligations in relation to housing as listed on page 3 of this report.

4.2 In direct relation to the contents of this report, these include the provision of housing advice and assistance to prevent homelessness or divert from homelessness, assessment of homeless applications, to make temporary and permanent housing provision for those applicants to whom the Council has a statutory rehousing duty, and supporting such households to sustain accommodation.

Non-Applicable Sections:	Personnel
Background Documents: (Access via Contact Officer)	Homelessness Strategy – Sara Bowrey Portfolio Plan 2010/11 – Catriona Ellis Business plan – David Gibson Empty Property Strategy – ACS PDS November 2009

Appendix A



Appendix B

Accommodation Costs:

Weekly charges

	Nightly paid accommodation (average weekly costs apportioned across all placements). Cost to LBB after HB income. £		§ Housing Association leased (HAL) accommodation § Private sector leasing (PSL) scheme § Temporary accommodation provided via permanent HA stock & hostels	Discharge of Duty homeless prevention in private rented sector. – one off payments - averages £		Potential weekly per unit income for use of LBB/other existing stock £
	Inner London	Outer London		One off costs	On going costs	
shared accommodation	+13.65	-44.24	0	-75	0	+155.75
self contained 1 bed/studio	-70.05	-103.17	Cost neutral. Charges met through rental stream within LHA subsidy rates. Small financial risk relating to potential abandonment and short term rental loss for PSL scheme	-150	0	+180.02
self contained 2 bed/studio	-46.53	-127.33		-184	0	+211.35
Self contained 3 bed	-103.24	-243.34		- 207.69	0	+246.66
Self contained 4+ bed	-147.70	-251.54		- 230	0	+310
Notes:	Increasingly availability of accommodation is at higher costs with maximum weekly net costs now exceeding £400 per week for some placements.		Increased difficulty experienced in acquiring units within subsidy rates	Maximum offered equates to four weeks. Majority of units secured via underwritten bond rather than cash incentive. Significant proportion recycled at end of tenancy term.		Potential to also claim additional intensive management/support service charge. Above income would cover management/maintenance costs leaving a balance for an income stream.

APPENDIX 2

MINUTE OF THE A&C PDS MEETING - 27 SEPTEMBER 2011

ADDRESSING RISING HOMELESSNESS AND HOUSING NEED AND ASSOCIATED BUDGETARY PRESSURES **Report ACS11053**

The Portfolio Holder introduced a report providing an overview of the current housing market supply and need position within Bromley. The report also outlined the initiatives and direction proposed to address the current mismatch between housing need and supply which was resulting in increased usage and cost of temporary accommodation with associated budgetary pressures. The report detailed a range of current and proposed initiatives which would seek to minimise the use of more expensive forms of temporary accommodation and thus seek to reduce the projected budget overspend. The Committee considered a range of issues including:

- **The data used in identifying trends.** The Head of Housing Need reported that the Department had gathered a significant amount of data for the trend analysis and paragraph 1.5 of the report provided a summary of this data. A detailed breakdown of the data could be provided to Members. Councillor Julian Grainger requested to see a monthly plot of the data that had been gathered.
- **Identifying homes for use in more affordable parts of the Country.** The Assistant Director (Housing and Residential Services) reported that some Homes & Community Agency funding had been used jointly by the South East London Boroughs through Housing Associations to purchase properties around the Kent coast. A Member highlighted that tenants within the private sector expected to move to properties in a number of geographical locations dependant on their available budget and individual circumstances. It therefore stood to reason that tenants in the social rented sector should be expected to adjust their expectations to fit with the budget available and their individual circumstances, and in certain cases this should mean considering properties in less expensive areas of the Borough or the Country. In response it was noted that under current housing/homeless legislation this could only be addressed by the Council with tenants and homeless families on a voluntary basis.
- **The payment in lieu.** The Assistant Director (Housing and Residential Services) reported that some of the payments, received by the Council in lieu of affordable housing, had been invested in the Crown Meadow Court project whilst some funds had been used to support development for learning disability projects. By utilising funds received in lieu of affordable housing in partnership with Housing Associations, the fund produced more properties due to the greater proportion of the capital cost being borne by the Housing Association and repaid through the

rental income stream. Meanwhile, purchase of existing properties generated supply more quickly than funding new development.

- **The supply of housing across the Borough.** A Member suggested that one of the key issues facing the Local Authority was that not enough properties were being built across the Borough. In response, the Assistant Director (Housing and Residential Services) acknowledged that less properties were currently being built but that in the current economic climate developers were not building houses as less people could afford to obtain a suitable mortgage or have the required deposit than prior to the recession. A Member stressed the importance of encouraging Councillors sitting on the Planning Sub-Committees to recognise that there was an increasing need for residential properties. The Assistant Director (Strategy and Performance) reported that this report would be forwarded to the Development Control Committee for consideration.
- In response to a question about household growth the Assistant Director (Housing and Residential Services) reported that a significant proportion of the population of Bromley were first time home occupiers and those suffering from marital breakdown and this impacted on the supply of housing in the Borough.
- A Member requested a statistical breakdown of the individuals on the housing register.

The Committee recommended to the Portfolio Holder that the inclusion of the theme of locating properties in less expensive areas of the Country in the strategy, and that the report be submitted to the Development Control Committee for information in consideration of the Core Strategy on Affordable Housing.

RESOLVED that the Portfolio Holder be recommended to:

- a) Agree the continued strategy and initiatives for 2011/12 as detailed in paragraph 1.18 of the report, the range of housing duties and needs in Bromley and to deal with increased pressures on the service and budget.**
- b) Approve the pursuance of the proposed initiatives and direction as outlined in paragraph 1.19 of the report and in particular the work around seeking use of empty Council buildings as temporary accommodation and the potential for using other forms of temporary accommodation – e.g. mobile homes,**
- c) Approve the proposals for use of Payment in Lieu funds as detailed in paragraph 1.22 of the report aimed at contributing supply options to help address the issues raised in this report.**

- e) Note and support the ongoing work of the Empty Homes Officers to contribute to the supply and help address the budget pressures and for the additional financial benefits as per paragraphs 1.26 to 1.28 of the report.**
- f) Support the proposal to make a spend to save bid for a person to see through the work on the range of proposals and initiatives on increasing supply to reduce the pressures and spend on Bed and Breakfast accommodation;**
- g) Support the proposal to make a bid for LBB capital to ensure sufficient funding for grants to bring empty properties back in to use with the aim of such grants to be in the form of loans to reduce the pressures and spend on Bed and Breakfast accommodation and increase the financial benefit to the Council from the New Homes Bonus.**
- h) Agree to the inclusion of the theme of locating properties in less expensive areas of the Country in the strategy,**
- i) Agree that the report be submitted to the Development Control Committee for information in consideration of the Core Strategy on Affordable Housing.**

This page is left intentionally blank

Agenda Item 7

Report No.
DRR11/116.

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **COMMUNITY INFRASTRUCTURE LEVY - CONSULTATION ON
DETAILED PROPOSALS AND DRAFT REGULATIONS FOR
REFORM.**

Contact Officer: Terri Holding, Planning Officer
Tel: 020 8 313 4344 E-mail: terri.holding@bromley.gov.uk

Chief Officer: Chief Planner Bob McQuillan

Ward: All

1. Reason for report

1.1 This report brings to Members attention that the Government is consulting on the detailed proposals and draft regulations for reforms to the Community Infrastructure Levy. The consultation began on the 10th October and closes on the 30th December 2011. The proposed reforms are the result of changes to the levy proposed by the Localism Bill in final stages through Parliament (which provides for a new neighbourhood planning regime). The issues covered by the consultation are far broader than just planning and it is therefore anticipated that the Executive will consider a report to agree the basis of a corporate response to meet the December deadline.

2. **RECOMMENDATION(S)**

2.1 That Development Control Committee notes the publication of the consultation and questions at Appendix 1.

2.2 That Development Control Committee notes the intention for a report to go to the Executive in December with a suggested corporate response to meet the 30th December deadline.

Corporate Policy

1. Policy Status: N/A.
 2. BBB Priority: Excellent Council. Quality Environment,Vibrant Thriving Town Centres
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: £N/A
 5. Source of funding: N/A
-

Staff

1. Number of staff (current and additional): N/A
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory requirement. Planning Act 2008 Part11
 2. Call-in: Call-in is not applicable. information item
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No.
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 The Planning Act 2008 (Dec) enabled a planning charge to be collected locally, this is known as the Community Infrastructure Levy (CIL). Local Authorities have been empowered since April 2010, to levy this charge on most types of residential, commercial and industrial development to help fund infrastructure which is fundamental to the delivery of a vision for the area, and identified through the Infrastructure Delivery Plan (IDP) which is already required by PPS12, as part of the Local Plan/Core Strategy process. Development Control Committee has previously had reports outlining CIL in detail. CIL will provide more resources while the Government has said that core public funding will continue to bear the main burden. Local Authorities (London Boroughs are charging authorities) will need to utilise CIL if they choose, alongside other funding streams to deliver infrastructure plans locally but it cannot be used to remedy existing deficiencies locally.
- 3.2 The Government set out proposals to reform the Community Infrastructure Levy regulations in the 2010 Localism Bill, which is still going through the Parliament. The changes would require local authorities to pass a meaningful proportion of receipts to the neighbourhoods where the development that gave rise to them took place, clarifies that receipts may be spent on the ongoing costs of providing infrastructure to support the development of the area and provides more local choice over how to implement a charge. The aim of the consultation is to seek views on matters relating to the detailed implementation of the Government's proposals.

These include:

- The implementation of neighbourhood funds – to give local authorities and their communities the means and flexibility to manage the impacts of development; the local authority will retain the CIL funds and engage with communities in determining how to spend those receipts. Neighbourhoods will be able to spend the funds on the infrastructure that they want, for example open space provision, playgrounds and cycle paths, or by contributing to larger projects funded by other bodies e.g. the Council. Neighbourhood spending cannot be used to remedy pre-existing deficiencies in infrastructure provision, except to the extent that they will be aggravated by new development, as with the Council CIL spending.
- Allowing receipts to be used to provide affordable housing -the Planning Act 2008 allows for affordable housing to be included as a type of infrastructure, but the current CIL regulations prevent receipts being used for this purpose. The Government seeks views on providing local authorities with an option to use the CIL to deliver affordable housing (alongside other forms of infrastructure) where there is robust evidence that doing so would demonstrably better support its provision and offer better value for money. The purpose of the consultation is to consider whether allowing this flexibility would allow for not only more efficient provision of affordable housing but better support delivery of local policies, including off-site provision.
- Requiring charging authorities to report more openly and regularly on receipts and expenditure to improve transparency and understanding of the contribution that developers are making and how those funds are used the Levy reporting requirements are set out in current levy regulation where the levy receipts and expenditure in relation to the previous financial year are reported through the Planning Annual Monitoring Report. The Government want charging authorities to be required to make information on levy receipts and expenditure available to communities in 'real time'.
- Adding new Development Orders to the list of developments that may be liable to a CIL charge – the Localism Bill introduces new provision to allow for planning permission to be granted through Neighbourhood Development Orders, including Community Right to Build Orders.
- Providing transitional provisions to allow fair operation of the levy in Mayoral Development Corporation (MDC) areas – the Localism Bill includes a general power for the designation for

Mayoral development areas to drive regeneration. Proposed amended CIL regulation would then reflect this.

- 3.4 Views are being requested corporately before the questionnaire at Appendix 1 is compiled. Following the closure of the consultation at the end of December, and the passage of the Localism Bill through its Parliamentary stages, the Government will consider responses to this consultation before finalising the CIL regulations, which will then be laid before Parliament.

4. POLICY IMPLICATIONS

The Community Infrastructure Levy is designed to be a charge to help fund infrastructure which is fundamental to the delivery of a vision for the area, as identified through the Infrastructure Delivery Plan (IDP) which is part of the Local Plan/Core Strategy process. Council's have a choice to develop a CIL in their area at a level that will not effect the economic viability of development.

Non-Applicable Sections:	Financial, Legal and Personnel at this stage of consultation.
Background Documents: (Access via Contact Officer)	Planning Act 2008 DCC report 20 th October 2009 -Community Infrastructure Levy (CIL). SPD Planning Obligations December 2010 DCC and Executive report 8 th & 14 th Feb 2011- Consultation on Mayoral Community Infrastructure Levy. CLG - Community Infrastructure Levy Regulation- April 2010 CLG - Community Infrastructure Levy Regulation- April 2011

Questionnaire**Chapter 1: Neighbourhood funds**

1. Should the duty to pass on a meaningful proportion of levy receipts only apply where there is a parish or community council for the area where those receipts were raised?
2. Do you agree that, for areas not covered by a parish or community council, statutory guidance should set out that charging authorities should engage with their residents and businesses in determining how to spend a meaningful proportion of the funds?
3. What proportion of receipts should be passed to parish or community councils?
4. At what level should the cap be set, per council tax dwelling?
5. Do you agree that the proposed reporting requirements on parish or community councils strike the right balance between transparency and administrative burden?
6. Draft regulation 19 (new regulation 62A(3)(a)) requires that the report is to be published on the councils website, however we recognise that not all parish or community councils will have a website and we would welcome views on appropriate alternatives.
7. Do you agree with our proposals to exclude parish or community councils' expenditure from limiting the matters that may be funded through planning obligations?
8. Do you agree with our proposals to remove the cap on the amount of levy funding that charging authorities may apply to administrative expenses?

Chapter 2: Affordable housing

9. Do you consider that local authorities should be given the choice to be able if they wish to use levy receipts for affordable housing?
10. Do you consider that local authorities should be given the choice to be able if they wish to use both the levy and planning obligations to deliver local affordable housing priorities?
11. If local authorities are to be permitted to use both instruments, what should they be required to do to ensure that the choices being made are transparent and fair?
12. If the levy can be used for affordable housing, should affordable housing be excluded from the regulation that limits pooling of planning obligations, or should the same limits apply?

Chapter 3: Mayoral Development Corporations

13. Do the proposed changes represent fair operation of the levy in Mayoral Development Corporation areas?

This page is left intentionally blank

Report No.
DRR11/120

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **NEIGHBOURHOOD PLANNING REGULATIONS
CONSULTATION LOCAL PLANNING REGULATIONS**

Contact Officer: Mary Manuel, Head of Planning Strategy and Projects
Tel: 020 8313 4303 E-mail: mary.manuel@bromley.gov.uk

Chief Officer: Bob McQuillan, Chief Planner

Ward: Borough-wide

1. Reason for report

- 1.1 This report draws the Committee's attention to the publication of the Government (Department for Communities and Local Government) consultation on 'Neighbourhood Planning Regulations'. This consultation seeks views on proposed new regulations governing aspects of the powers proposed within the Localism Bill, in particular the process for establishing neighbourhood areas and forums, and the preparation of neighbourhood plans and neighbourhood development orders together with community right to build orders.
- 1.2 The consultation was issued on 13th October and responses required by 5th January 2012. A draft response is attached as Appendix 2.

2. **RECOMMENDATION(S)**

That Development Control Committee:

- 2.1 Agree Appendix 2 as the basis of the Council's response to the Neighbourhood Planning Regulations and the formal response to be finalised by the Chief Planner in consultation with the Committee's Chairman
- 2.2 Agree that officers provide a briefing for the Committee after the Localism Bill is enacted and the regulations adopted with respect to the planning implications.

Corporate Policy

1. Policy Status: N/A.
 2. BBB Priority: Quality Environment. Vibrant Thriving Town Centres
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: £N/A
 5. Source of funding: N/A
-

Staff

1. Number of staff (current and additional): N/A
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory requirement.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough-wide.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments: N/A

COMMENTARY

- 3.1 The Government's Department of Communities and Local Government (DCLG) issued 'Neighbourhood Planning Regulations' for consultation on 13th October with responses sought by 5th January 2012.
- 3.2 Neighbourhood Planning is a central element of the Government's localism and decentralisation agenda (and has been discussed at previous Committee meetings). The Localism Bill leaves various procedural and technical requirements of the neighbourhood planning system to regulations. The Localism Bill would also significantly amend the Town and Country Planning Act 1990. Parliament is currently considering amendments to the Bill with Royal Assent expected within the next few months. This consultation seeks views on whether the proposed neighbourhood planning regulations are fit for purpose. This includes arrangements for referendums and the Director of Legal and Democratic Services has been asked to respond to this section of the consultation.
- 3.3 Appendix 1 comprises a copy of the DCLG's introduction to neighbourhood planning for information.
- 3.4 The consultation focuses on the approach to taking up the regulation making powers and asks if the right balance is taken between standardising the approach to neighbourhood planning and providing sufficient local flexibility to reflect local circumstances. The Government is not taking up all the regulation making powers within the Localism Bill but leaves scope to do so at a later date.
- 3.5 The regulations refer to proposed amendments to the Town and Country Planning Act 1990 within the Localism Bill which may still change prior to Royal Assent. On this basis a draft response to the consultation is included in Appendix 2 but will need to be reviewed prior to submission by the 5th January deadline. Adjustment may be required to reflect the final or latest wording in the Localism Bill.
- 3.6 The regulations focus on the processes involved in neighbourhood planning. For instance, the requirements for an application by an organisation to be designated a neighbourhood forum for a neighbourhood area, and the manner in which the authority is required to give notice and publish its decision in relation to this along with proposals for neighbourhood plans, neighbourhood development orders and community right to build orders.
- 3.7 Experience from 'front runner' authorities indicates that many neighbourhood and community forums exploring potential neighbourhood plans for their areas and wishing to be involved in the planning of their areas, are not seeking the levels of growth behind the Government's rationale for neighbourhood plans. Neighbourhood plans aim to involve communities in how growth is managed and delivered, and to ensure they share in some of the benefits. Many local groups and residents are seeking to protect the character of their areas and are finding that being more involved in the borough level planning process can achieve their objectives as these have to be sufficiently robust to meet the often very varied needs and opportunities of different localities within an authority's boundary. The importance of an 'up to date' local plan is emphasised in the draft national planning policy framework (discussed at the Committee's September meeting) and this is reinforced by the introduction of neighbourhood planning.
- 3.8 The Council will need to consider carefully how the Local Development Framework, and in particular, the Core Strategy or any emerging Local Plan reflects the localism and neighbourhood planning agenda.
- 3.9 A key concern is that local authorities are given sufficient flexibility to respond to their local circumstances. London, is different from the rest of the country in that the London Plan provides a broader spatial plan while regional spatial strategies have been abolished

elsewhere. In this context there is already an additional layer of requirements and the importance of securing and maintaining an effective and up to date borough level should be the priority. Neighbourhood planning has the potential to be very resource hungry with substantial requirements placed on authorities to respond to, and support the neighbourhood planning process.

- 3.10 In areas, such as Bromley where there is limited scope for development the number of areas where neighbourhood planning may be appropriate is likely to be small. This needs to be reflected in the local plan-making process and communicated effectively with local residents and the wider community. The Government has made clear that the presumption in favour of development in the draft national planning policy framework applies to neighbourhood planning and neighbourhood plans are only appropriate in areas where communities are seeking growth greater than that identified within the LDF or Local Plan.

POLICY IMPLICATIONS

- 4.1 The Council has to meet the requirements of the Localism Bill when enacted as the local planning authority and to apply all relevant regulations. Its role as local planning authority is central to achieving Building a Better Bromley and in particular, the priorities of a Quality Environment, Vibrant and Thriving Town Centres, and a Safer Bromley. A strong borough plan and policy framework is required for any potential neighbourhoods plans , neighbourhood orders and community right to build orders.

Non-Applicable Sections:	Financial, Legal and Personnel
Background Documents: (Access via Contact Officer)	Department of Communities and Local Government ‘ Local Planning Regulations July 2011 http://www.communities.gov.uk/publications/planningandbuilding/localregulationsconsultation

An introduction to neighbourhood planning

What is it?

Neighbourhood planning is a new way for communities to decide the future of the places where they live and work.

They will be able to:

- choose where they want new homes, shops and offices to be built
- have their say on what those new buildings should look like
- grant planning permission for the new buildings they want to see go ahead.

The Government wants to introduce the right to do neighbourhood planning through the Localism Bill. The Localism Bill is being debated by Parliament at the moment.

Why does it matter?

The planning system helps decide what gets built, where and when. It is essential for supporting economic growth, improving people's quality of life, and protecting the natural environment.

In theory, planning has always supposed to give local communities a say in decisions that affect them. But in practice, communities have often found it hard to have a meaningful say. The Government wants to put power back in the hands of local residents, business, councils and civic leaders.

Neighbourhood planning is optional, not compulsory. No-one has to do it if they don't want to. But we think that lots of people will want to take the opportunity to influence the future of the place where they live or work.

How will it work?

There will be five key stages to neighbourhood planning.

Stage 1: Defining the neighbourhood

First, local people will need to decide how they want to work together.

In areas with a parish or town council, the parish or town council will take the lead on neighbourhood planning. They have long experience of working with and representing local communities.

In areas without a parish or town council, local people will need to decide which organisation should lead on coordinating the local debate. In some places, existing community groups may want to put themselves forward. In other places, local people might want to form a new group. In both cases, the group must meet some basic standards. It must, for example, have at least 21 members, and it must be open to new members.

Town and parish councils and community groups will then need to apply to the local planning authority (usually the borough or district council).

It's the local planning authority's job to keep an overview of all the different requests to do neighbourhood planning in their area.

They will check that the suggested boundaries for different neighbourhoods make sense and fit together. The local planning authority will say "no" if, for example, two proposed neighbourhood areas overlap.

They will also check that community groups who want to take the lead on neighbourhood planning meet the right standards. The planning authority will say "no" if, for example, the organisation is too small or not representative enough of the local community.

If the local planning authority decides that the community group meets the right standards, the group will be able to call itself a 'neighbourhood forum'. (This is simply the technical term for groups which have been granted the legal power to do neighbourhood planning.)

The town or parish council or neighbourhood forum can then get going and start planning for their neighbourhood.

Stage 2: Preparing the plan

Next, local people will begin collecting their ideas together and drawing up their plans.

- With **a neighbourhood plan**, communities will be able to establish general planning policies for the development and use of land in a neighbourhood. They will be able to say, for example, where new homes and offices should be built, and what they should look like. The neighbourhood plan will set a vision for the future. It can be detailed, or general, depending on what local people want

- With a **neighbourhood development order**, the community can grant planning permission for new buildings they want to see go ahead. Neighbourhood development orders will allow new homes and offices to be built without the developers having to apply for separate planning permission.

Local people can choose to draw up **either** a plan, **or** a development order, or **both**. It is entirely up to them. Both must follow some ground rules:

- They must generally be in line with local and national planning policies
- They must be in line with other laws
- If the local planning authority says that an area needs to grow, then communities cannot use neighbourhood planning to block the building of new homes and businesses. They can, however, use neighbourhood planning to influence the type, design, location and mix of new development.

Stage 3: Independent check

Once a neighbourhood plan or order has been prepared, an independent examiner will check that it meets the right basic standards.

If the plan or order doesn't meet the right standards, the examiner will recommend changes. The planning authority will then need to consider the examiner's views and decide whether to make those changes.

If the examiner recommends significant changes, then the parish, town council or neighbourhood forum may decide to consult the local community again before proceeding.

Stage 4: Community referendum

The local council will organise a referendum on any plan or order that meets the basic standards. This ensures that the community has the final say on whether a neighbourhood plan or order comes into force.

People living in the neighbourhood who are registered to vote in local elections will be entitled to vote in the referendum.

In some special cases - where, for example, the proposals put forward in a plan for one neighbourhood have significant implications for other people nearby - people from other neighbourhoods may be allowed to vote too.

If more than 50 per cent of people voting in the referendum support the plan or order, then the local planning authority must bring it into force.

Stage 5: Legal force

Once a neighbourhood plan is in force, it carries real legal weight. Decision-makers will be obliged, by law, to take what it says into account when they consider proposals for development in the neighbourhood.

A neighbourhood order will grant planning permission for development that complies with the order. Where people have made clear that they want development of a particular type, it will be easier for that development to go ahead.

What happens next?

The formal legal right to do neighbourhood planning will only be available after the Localism Bill is approved by Parliament. We hope that the Bill will be approved later in 2011, and the formal right to do neighbourhood planning will follow later in 2012.

In some places, though, community groups, developers and councils are already thinking about how neighbourhood planning might work in their area. Check your council's website, read your local newspaper, or talk to a local community group to find out what's happening in your area.

Funding and support

There will be several sources of advice and support for communities who are interested in doing neighbourhood planning:

- The **local planning authority** will be obliged by law to help people draw up their neighbourhood plans
- **Developers, parish and town councils, landowners and local businesses** may all be interested in sponsoring and taking a leading role in neighbourhood planning. In fact, in some places, local businesses are already starting a debate with local residents and councils
- **The Government** has committed to providing £50m until March 2015 to support local councils in making neighbourhood planning a success
- **The Government** have already provided £3m to four community support organisations, who already support communities in planning for their neighbourhood. Their details are below:

The Prince's Foundation for the Built Environment

Contact name: Sebastian Knox

Tel: 020 7613 8587

Email: sebastian.knox@princes-foundation.org

Website: <http://www.princes-foundation.org/our-work/supporting-communities-and-neighbourhoods-planning>

CPRE in partnership with NALC

Contact name: Nigel Pedlingham

Tel: 020 7981 2832

Email: Nigelp@cpre.org.uk

Website: <http://www.planninghelp.org.uk/>;
www.cpre.org.uk; www.nalc.gov.uk

Locality

The Building Community Consortium

Contact name: David Chapman

Tel: 0845 458 8336

Email: neighbourhoodplanning@locality.org.uk

Website: www.buildingcommunity.org.uk

RTPI

Planning Aid

Contact name: John Rider-Dobson

Tel: 0203 206 1880

Email: info@planningaid.rtpi.org.uk

Website: <http://www.rtpi.org.uk/planningaid/>

This page is left intentionally blank

(b) Consultation questions

Question 1:

Do you agree that the proposed approach is workable and proportionate, and strikes the right balance between standardising the approach for neighbourhood planning and providing for local flexibility on:

a) designating neighbourhood areas

Disagree

Explanation/Comment:

Whilst the regulations rely on Good Practice emerging there is insufficient detail in the regulations to clarify what reasoning LA's need to produce to refuse areas which it considers may prejudice a broader more sustainable neighbourhood plan (eg due to size or the specific nature of a single issue plan or being contrary to intentions of the Local Plan). There is no information regarding any right of appeal against a LA's decision to reject a plan. Working with neighbourhood forum groups to facilitate the development of appropriate areas will have resource implications.

b) designating neighbourhood forums

Neither agree nor disagree

Explanation/Comment:

Whilst not within the current regulations the supporting information provided with the consultation indicates that for "Future proofing" there are powers, within the Localism Bill, which enable the Government to set out other conditions for designating neighbourhood forums". LA's should be involved in any changes to the prescribed conditions as they are best placed to understand the representation of the local community.

The regulations do not indicate the circumstances in which a forum might not be accepted. Assuming they have met the constitutional requirements to make their application in the first instance, it appears the only on the basis for refusing a forum appears to be that the defined "neighbourhood area" is not accepted. The Local Authority should have sufficient flexibility to ensure that a forum is genuinely representative, rather than comprising of an engaged but unrepresentative minority.

c) Community Right to Build organisations

Neither agree nor disagree

Explanation/Comment:

The ability of all who live or work in the particular area to have the opportunity to become members is welcomed to ensure that all local people can be involved in the development of the proposals. This will be important to bear in mind when the extent of the area is defined.

d) preparing the neighbourhood plan

Neither agree nor disagree

Explanation/Comment:

LPA's are obliged to assist in the preparation, which has significant resource implication, however, there is insufficient detail about the extent of LA involvement to determine the likely costs and whether reasonable fees would be sufficient to recover costs.

e) preparing the neighbourhood development order

Disagree

Explanation/Comment

As the supporting information with the consultation indicates Neighbourhood Development Order can grant full planning permission. Whilst the regulations are intended to seek the "minimum information necessary". LA's will want to ensure that where the order is effectively seeking a full planning permission the LA should be able to require the same level of detail it would for a planning application, applying it's local list to ensure full consideration of the environmental, social and economic implications of the proposal. We would not wish to see any less stringent scrutiny of the proposal.

f) preparing the Community Right to Build order

Disagree

Explanation/Comment:

As a Community Right to Build Order is a form of Neighbourhood Development Order the same points for 1 e).

Additionally, should a Community Right to Build order be granted with the benefits to the community an important part of the consideration of the order, but the order is not carried forward, a precedent may be set for a scale of development which could be carried forward through a neighbourhood development order or planning application without the benefits

g) Community Right to Build disapplication of enfranchisement

Disagree

Explanation/Comment:

Should a Community Right to Build order be granted with a disapplication of enfranchisement (removal of right to buy) but not carried forward a precedent may be set for a scale of development which could be carried forward without the disapplication of enfranchisement.

h) independent examination

Neither agree nor disagree

Explanation/Comment:

Whilst not within the current regulations the supporting information provided with the consultation indicates that for "Future proofing" there are powers, within the Localism Bill, which enable the Government to require the examiner to look at additional matters during the independent examination. The examiner should not be required by central government to consider matters that neither the local neighbourhood forum nor the LA consider relevant to the consideration of a particular neighbourhood plan, as LA's are best placed to understand the issues to be addressed in their local communities.

i) referendum

Explanation/Comment:

There are concerns about the cost and practicality of referendum and discussions are underway with our Legal and Democratic Services Department.

Whilst these regulations do not cover the detail of the referenda the DCLG “Introduction to Neighbourhood Planning” indicates that people from other neighbourhoods may be allowed to vote. There will need to be clarity about how, and when, this flexibility is to operate.

j) making the plan or order

Disagree

Explanation/Comment:

There are concerns regarding the potentially significant resources required for consultation and publication of plans or orders. Concern that the Bill and regulations over simplify what will be required to meet local high standards of consultation with the public.

k) revoking or modifying the plan

Neither agree nor disagree

Explanation/Comment:

l) parish councils deciding conditions

n/a

Question 2:

Our proposition is that where possible referendums should be combined with other elections that are within three months (before or after) of the date the referendum could be held. We would welcome your views on whether this should be a longer period, for example six months.

Three months

Six months

A different period

Explanation/Comment:

There are concerns about the cost and practicality of referendum and discussions are underway with our Legal and Democratic Services Department.

Question 3:

The Bill is introducing a range of new community rights alongside neighbourhood planning – for example the Community Right to Buy and the Right to Challenge. To help communities make the most of this opportunity, we are considering what support measures could be made available. We are looking at how we could support people in communities, as well as local authorities, other public bodies, and private businesses to understand what each right can and cannot do, how they can be used together, and what further support could be made available for groups wanting to use them. We would welcome your views on what support could usefully be provided and what form that support should take.

Explanation/Comment:

Concern that the £50m set aside nationally to March 2015 may not be sufficient if there is wide uptake. Is work undertaken by LPA's to support neighbourhood forums chargeable?

Question 4:

Do you have any other comments on the proposals?

Explanation/Comment

Concerns regarding the cost as stated above. There are currently no regulations in respect of charges being applied by the LA to assist with developing the plans / orders or fees to determine plans / orders, however resources will be fundamental to the effective operation of the regulations currently being considered.

The Regulations are to be reviewed within 5 years to assess whether the objectives intended to be achieved by the regulations have been met, and whether less regulation would assist [See responses in relation to 1b) and 1h)]

Plans and orders will need to be recorded through Land Registry.

Agenda Item 9

Report No.
DRR11/115

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: DEVELOPMENT CONTROL COMMITTEE

Date: 17TH November 2011

Decision Type: Non-Urgent Non-Executive Non-Key

Title: CORE STRATEGY ISSUES DOCUMENT - CONSULTATION RESPONSE

Contact Officer: Mary Manuel, Head of Planning Strategy and Projects
Tel: 020 8313 4303 E-mail: mary.manuel@bromley.gov.uk

Chief Officer: Bob McQuillan

Ward: All

1. Reason for report

This report updates the Committee on the response to the consultation on the Core Strategy Issue Document undertaken between July and the beginning of October 2011. It highlights the level of response and the key issues raised by statutory and other consultees.

2. **RECOMMENDATION(S)**

That Development Control Committee:

- 2.1 Consider and comment on the summary of responses to the Core Strategy Issues Document consultation attached as Appendix 1 and the key issues identified in paragraphs 3.5
- 2.2 Note the timescale and changing context for the preparation of the Core Strategy as set out in Appendix 2.

Corporate Policy

1. Policy Status: New policy.
 2. BBB Priority: Quality Environment. Vibrant and Thriving Town Centres, An Excellent Authority, Supporting Independence,
-

Financial

1. Cost of proposal: No cost
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: Planning Division Budget
 4. Total current budget for this head: £3.3m
 5. Source of funding: Existing revenue budget
-

Staff

1. Number of staff (current and additional): 103.89 FTEs
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory requirement.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough-wide
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes.
2. Summary of Ward Councillors comments: All Councillors have been sent emails and a letter advising them of the consultation process and provided with a leaflet on the consultation process. Ward Councillors had been consulted on an early draft prior to consultation and comments received reflected in the consultation document agreed by the Executive in May 2011. Councillor Anne Manning responded and her comments have been included in the analysis.

3. COMMENTARY

- 3.1 In March 2011 Development Control Committee agreed the structure and approach to preparing the Core Strategy Issues Document and in March and April 2011 contributed to, and agreed, the strategic themes and area profiles for inclusion in the document. The Executive at its May 25th meeting approved the Draft Core Strategy Issues Document for consultation over the Summer.
- 3.2 Consultation took place between early July and 3rd October. Initially publicised until the end of September the on-line consultation system was extended by a few days following requests from several local residents. The consultation is not a statutory or formal consultation but forms part of the 'front loading' engagement process required by Government regulations and policy. The aim is to increase participation and reduce the level of objections and resources required at later stages of the plan making process. Members will be advised of any further comments received after the preparation of this report and any key issues raised.

The consultation process

- 3.3 The consultation process as approved by Members focused on encouraging responses on-line via the Council's website as the most cost effective medium. However, to complement this the process included the following:
- The use of advertising sites across the Borough during July to raise public awareness.
 - Publicity through press releases, articles and adverts in the Bromley Times, News Shopper, Bromley Borough News, and Biggin Hill magazine.
 - Staffing a market stall in Bromley High Street 15/8/11 and 9/9/11
 - A4 posters and A5 flyers distributed across the Borough, in Council offices (including Cotmandene and Mottingham Outreach Centres and all reception areas) , libraries, community venues e.g. Bromley Adult Education College, Community House, Mytime leisure centres and police stations. Town Centre Managers also distributed leaflets
 - Letters/emails to over 1000 residents, agents and others registered on the planning department's consultation database.
 - Presentations and discussion at the Bromley Residents Federation meeting 21st July, and with Disability Voice, the Youth Council and the Gypsy and Travellers Project.
 - Promotion on the Council's website with links to the consultation document from early July to 3rd October.
 - Copies of the document were available in all Bromley libraries and at Community Links Bromley.
 - Articles and links to the document included in Bromley's business e-bulletin sent to over 2,500 businesses in July and September.
 - Articles and links to the document in Bromley Community Links e-bulletin
 - On the agenda of partnership groups, including the Local Strategic Partnership, the Economic Partnership and the Partnership Officers Group with representatives of the borough's strategic partnerships. Also discussed at individual partnership meetings, as appropriate.

- Hard copies of the consultation document were made available on request.

Response to Consultation

- 3.4 Over 100 individuals and organisations responded to the consultation document making over 625 comments in total. Unfortunately a smaller proportion than had been expected, and hoped, used the on-line system to respond and therefore the process of analysis has been more complicated and time intensive. A list of the respondents and further detail of comments will be placed in the Members' Library prior to the Committee meeting.

Appendix 1 provides a summary of the consultation responses.

- 3.5 Key Issues raised that will need consideration as part of the next stage of the plan-making process include:
- **Green Belt and other protected open space** - There have been several representations in respect of the designation of sites in the Green Belt. In light of previous experience with the UDP, it is assumed that during the formal stages of consultation on the Core Strategy additional sites will be forthcoming. With this in mind, it is proposed to review the Green Belt boundary, specific attention being paid to the sites arising during this consultation, together with those proffered during the emergence of the UDP in 2001. This approach would not only give a sound basis for defining the boundary in the Core Strategy, but allow solid grounds to be developed for rejecting any suggested releases which cannot be justified.
 - **Areas of Special Residential Character** – Chelsfield Residents Association have requested their area be designated an Area of Special Residential Character. The character of the different parts of the borough is one of its particular strengths and residential character is a key element of this. Reviewing the areas designated as ASRCs is appropriate at this stage. This will involve recognising areas of special character while ensuring the status is not diluted.
 - **Business Areas** – business patterns and activities have changed in recent years locally, within London and globally. The recent recession and continuing poor economic climate have to be considered in the longer term economic context and forecast growth. The GLA and Outer London Commission recognise that Bromley and similar areas have underperformed economically, in part due to lower levels of investment at the strategic level. The Council's aspirations and plans, in particular, for Bromley Town Centre aim to address this. A strong and robust local economy is central to maintaining and improving the quality of life of residents.
 - **Provision of Gypsy and Traveller Pitches** – The borough has a long established Gypsy and Traveller community and identifying and addressing their needs is a requirement for the Council. Demonstrating how the long term needs may be accommodated will include a review of temporary permissions.
 - **Crystal Palace** – The GLA's masterplan for Crystal Palace Park was approved in 2010 and discussions to take forward the park's long term management are taking place. The longer term enhancement of the park is a key priority and reflects its proximity to the borough boundary. Of London wide importance, this involves adjoining boroughs and other partners. The diverse communities in the areas crossing five boroughs make the pattern of services and facilities particularly complex.
 - **Biggin Hill** – Identified as a Strategic Outer London Development Centre in the London Plan the intention is to ensure that proposals for the business areas are integral to the

overall ambitions for the borough and this will be part of the next stage of the plan making process.

- **Housing Targets and Capacity** – The Council was successful in securing a lower housing target than the draft London Plan proposed for the borough demonstrating issues of capacity on existing sites. Priorities of protecting and respecting the character of the different residential areas within the borough will impact on acceptable levels of density and further work will be required to ensure the borough’s aspirations are secured and to contribute to the anticipated GLA’s update of the Strategic Housing Land Availability Assessment.
- **Neighbourhood Plans** – The Government’s agenda and proposals for neighbourhood planning will need to be reflected in the next stage. Elsewhere on the agenda Members are asked to comment on the Government’s latest consultation with respect to neighbourhood planning. The priority should remain a robust borough level plan that sets the context for any more local proposals.

Next Steps

- 3.6 Parallel with Bromley preparing and consulting on its Core Strategy Issues Document the Government has consulted on major reforms to the planning system. Appendix 2 sets out the key changes and considerations at the national and local level and also sets out the anticipated timetable for the next few months. The Local Development Framework Advisory Panel considered this at its meeting earlier this month, noted the timetable noted and the approach to ensuring the plan making process is robust and responsive to the new planning agenda thereby positioning the Borough to deliver its priorities and ambitions.
- 3.7 Following consideration of the response to the Core Strategy Issues Document consultation by the LDF Advisory Panel and Development Control Committee further work will be undertaken to review options and brought back to Members for consideration.

4. POLICY IMPLICATIONS

- 4.1 Bromley 2020 as the agreed Sustainable Community Strategy for the Borough is the starting point for developing the Core Strategy together with other key Bromley documents. The Core Strategy will contribute to all the Council’s priorities, in particular, An Excellent Council, Vibrant and Thriving Town Centres and a Quality Environment and will replace the Unitary Development Plan in due course.

5. LEGAL IMPLICATIONS

- 5.1 Development plan documents have to be developed in accordance with the Planning and Compulsory Purchase Act 2004 regulations.

Non-Applicable Sections:	Financial and Personnel Implications
Background Documents: (Access via Contact Officer)	Report No DRR11/044 Core Strategy Issues Document – Report to Executive May 2011.

This page is left intentionally blank

APPENDIX 1

Core Strategy Issues Document - Summary of Responses Received - November 2011

Total no. of comments: 625

This document outlines the comments and suggestions received in response to the Core Strategy Issues Consultation Document July- Sept 2011.

The responses are made to the main three sections of the document:-

- **Vision and objectives - 46 comments**
- **Pen Portraits- 221 comments**
- **Strategic / Spatial Themes- 358 comments**

:

Vision and Objectives

No. comments = 46

Vision

Whilst some commented that the objectives are clear and focussed others felt that the objectives do not focus on the key issues residents are concerned about, are contradictory and should be SMART (Specific, Measurable, Achievable, Realistic and Timed), reflecting areas of priority, including a realistic timeframe in relation to resources available. It was suggested that the Vision statement should show more clearly how it is hoped Bromley will develop over the course of the Core Strategy period. The Vision eg, 'There are 45 conservation areas and a wide range of historic and listed buildings' reflects today (Environment Agency) rather than considering future changes in the role of town centres in the future, traffic and infrastructure changes and population growth. The Core Strategy should identify what has stopped us achieving the Vision today.

The loose boundary pen portraits are supported and it is suggested that the vision should be expanded to set out how the area and the places within it should develop, building on the pen portraits which set the scene. It was suggested that the Vision should relate closely to the Council's Community Strategy and develop the CS themes further, particularly regarding the quality of the environment and new housing.

The contribution of future development to achieving the Vision that "people enjoy a good quality of life in all Bromley's places" was highlighted.

Some comments noted that it is important to appreciate and acknowledge Bromley's position as London's greenest borough and the extent of Green Belt. However, others considered the Vision environmentally biased, noting that whilst environmental considerations are obviously important, most residents put education, health, prosperity, opportunity, mobility and transport above the environment.

It was noted that there are major disparities between the income and health factors across the Borough and that these disparities should be reflected somewhere within the overall Vision statement.

It should be acknowledged that The London Plan 2011, the National Planning Policy Framework and future guidance documents together with reference to working with adjacent boroughs all affect the outcomes of this document. Attention is drawn, to London Plan references to borough responsibilities, in respect of social infrastructure and suggest that London Plan terminology is used.

Objectives

1. Open and Natural Space

Suggested responses included:-

- Whilst there is a need to protect open spaces, natural environments and trees, there is also increasing pressure on the Green Belt to provide for the growing needs of the community. Appropriate development, which preserves the openness and appearance of the Green Belt should therefore be allowed.

- Small release of Green Belt for housing would be preferable to compromising the character and quality of life of residential areas that are already “full”.
- Changes should be made to the Green Belt boundary for land not serving the 5 purposes of Green Belt set out in PPG2. This would also be in line with the draft NPPF which includes references to
 - the presumption in favour of sustainable development, and the need to support economic growth through the planning system.
 - extending the allowance for previously developed land within Green Belt to come forward for development, which is allocated for redevelopment to similar sites not already allocated or designated for development in a local plan.

Also, when reviewing Green Belt boundaries through Local Plans

- have regard to the long term so that the boundaries endure beyond the plan.
- take account of the need to promote sustainable patterns of development.

Suggested additional Objective:

- *“To review the Green Belt Boundary to ensure that any sites, which do not meet the 5 criteria set out in PPG 2, are removed from the designation”.*
- Improving access to the Green Belt by the neighbouring urban populations should be a priority.
- This objective is broadly supported by Natural England with this suggested rewording “Encourage protection, enhancement and *creation* of biodiversity”
- This objective is supported by the Environment Agency who suggest
 - reference to delivering the Water Framework Directive though this objective
 - link with the blue ribbon policy in the London Plan.
 - incorporating actions from the local biodiversity action plan.
 - combining elements with Objective 7 (Climate Change and Environmental Issues)
 - revise objectives to refer to protection of *land, soil, surface and ground waters and air*, and the protection and enhancement of *fish stocks*. *Managing for the benefit of wildlife and people.*
 - Add new objectives:
 - § *Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change.*
 - § *Improve the quality of surface and ground water, rivers and wetlands for the benefit of people, the economy and wildlife.*
 - § *All sections of society to have opportunities to enjoy water and wetlands through sport and other recreations.*

2. Health and Wellbeing

- Objective to provide a healthier environment welcomed as is the support for all communities to improve their own environments. The Healthy Urban Development Unit suggests that the objective concerned with tackling deprivation should reference “health inequalities”.
- The role of biodiversity and the natural environment in respect of health, recreation, climate change adaptation and quality of life should be made more explicit in the Core Strategy and policies included to ensure the Borough’s green infrastructure is designed to deliver these multiple functions. (Natural England)
- The Environment Agency support the objectives and suggest an additional objective:
 - *Healthier local environments should be encouraged and managed to enhance people’s lives and support a sustainable economy.*

- A specific objective regarding planning for the ageing population in respect of housing and other support mechanisms, in particular a pro-active stance towards Owner Occupied Retirement Housing.

3. Housing

- Support for the objectives which facilitate an increased supply of new homes.
- Comment that the continuation of existing policies would not be a sound approach since they would not deliver the necessary quantum of growth.
- Raise the quality of existing flats particularly poorly maintained conversions which adversely affect the character.
- Too many old properties are readily demolished in favour of new build flats and executive homes, with little regard for infrastructure - local schools, surgeries.
- It is suggested that the objective be titled “Homes” rather than “Housing”
- The objective should provide an appropriate supply of housing suitable to a range of differing incomes.
- Bromley should sign up to the London Accessible Housing Register (LAHR)
- In many places there are few, if any opportunities for future housing development, however the pen portraits could at least highlight any that are likely to come up, even where development would be contrary to other objectives.
- The Environment Agency support objectives and suggest revisions to include:
 - *New and existing developments should have a reduced environmental impact and well-planned environmental infrastructure*
 - *The issues of contaminated land must be addressed safely before development begins*
 - *Measures to mitigate and adapt to climate change and flood risk shall be incorporated into new developments.*

4. Community Facilities

- Support for the objectives which support new community facilities that are accessibly located and it is essential that the Core Strategy seeks to protect the net loss of such facilities (Metropolitan Police Authority / Service, Bromley College of Further and Higher Education and others).
- South London Healthcare NHS Trust support the retention of facilities whilst noting that change may be required to modernise the provision of services, involving intensification, relocation or reprovision of traditional community facilities in more suitable locations.
- Supporting text should highlight “places of worship”

5. Business and Employment

- Support for the encouragement of business and employment through investment and development in the local economy.
- The objective to ensure that there is an adequate supply of commercial land in the Borough by ensuring that appropriate sites are available for redevelopment is supported, with particular reference to land adjacent to Crayfields Business Park.
- An increase in local employment opportunities is supported and identified business areas should be encouraged to adapt to the changing needs of modern industry and commerce.
- Acorus (for Scotia Gas Networks) comment that there should be reference to the “qualitative value” of business and employment land & buildings. Only the best employment land should be retained and protected with a review of sites no longer “fit for purpose”. Changes reflecting the flux in the current and potential uses are suggested to the 3rd & 4th bulleted objectives to ensure an

- Appropriate range of *suitable, available and developable land and premises...*
- Adequate supply of *high quality available, developable and suitable commercial land...*
- The most efficient and effective use should be made of land, prioritising previously developed land, noting that job creation can come from a range of Economic Development uses including retail.
- Capital Shopping Centres support the enhancement of Bromley's position as a Metropolitan Town and they, and others welcome the encouragement of a prosperous evening economy, which it is suggested, should build on existing strength.
- Suggestion that banks be allowed in prime town centre locations to meet the objective of encouraging investment and developing the local economy (UDP Shopping frontage policies and parts of the Bromley TCAAP out of date).
- The Environment Agency support objectives and suggest revisions to include:
 - *Businesses and other organisations know what the best environmental options are for using resources wisely.*
 - *Businesses and other organisations reduce the impacts of their activities on water, land and air and are responsible operators.*

6. Town Centres

- The approach of ensuring the continued vitality of Bromley Town Centre, particularly through the implementation of the AAP is supported by an Opportunity Site landowner who suggests that it should be made clear in the Core Strategy that the council will work pro-actively with landowners to enable delivery.
- Retail should be diverse and include a mix of local and chain offerings i.e. not just fashion and clothing shops from the usual brands.
- Include commitment to build and retain markets like the Thursday market in Bromley Town or the Friday and Saturday offerings in the High Street
- The Council needs to look closer at areas for regeneration, e.g. shop closures in Petts Wood
- Town Centres should be safe and welcoming all day or night. The behaviour of youths during the evenings and weekend will deter people from visiting the town centre.
- All existing retail sites should seek to fulfil their potential, including through expansion or redevelopment.
- Sustainable design and construction can add value to the local economy.
- Enable banks in prime town centre locations to "ensure continued vitality of Bromley Town Centre" (require BTCAAP changes).

7. Environmental Issues

- Reference to Green Infrastructure in this section is welcomed but should be incorporated into the objectives since they can significantly contribute to climate change adaptation.
- The Environment Agency support objectives and suggest revisions to the text to include wildlife and biodiversity and suggests the inclusion of water efficiency of new developments in the criteria for energy and resource saving in the final document They also suggest combining elements with Objective section1 (Open and Natural Space) and additional objectives to include:
 - *Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change.*
 - *Flood risk from all sources is effectively managed and people and property are better prepared and protected.*

- *Land is used sustainably to meet the needs of the public, business and the environment.*
- *Ensuring the right waste and resource management infrastructure is in place.*
- *Air quality is protected and improved.*
- *Businesses and other organisations and the public know what the best environmental options are for managing waste and using resources wisely.*
- *Safe, secure water supplies are used efficiently to meet the needs of the public, business and the environment.*
- *People and wildlife are helped to adapt to climate change and reduce its adverse impacts.*
- Surrey County Council welcome the objective to increase self-sufficiency in dealing with waste, and stress that this should relate to all three major waste streams - municipal waste (MSW), commercial and industrial (C&I) waste and construction and demolition (C&D) waste.

8. Design and the Public Realm

- Support for the objectives to improve the provision of open space in new development, ensuring accessible and safe streets.
- Natural England welcomes the reference to appropriate private and public open space, and encourages the council to include the provision of “soft” landscaping.
-
- The Environment Agency support objectives and suggest inclusion of the following objectives:
 - *Ensure a presumption against harm arising from any development*
 - *Ensure that there will be no net loss, and there should be clear benefits, arising from any development.*
 - *Ensure the improvement of rivers and their corridors*
 - *Ensure that land is managed sustainably to protect and improve water, land and air and contributing positively to reducing and adapting to climate change*
 - *New and existing development should have a reduced environmental impact and well planned environmental infrastructure*
 - *Development must achieve the highest design standards and which, at a minimum, is good enough to approve and will be a distinctive and valued addition to the area.*
 - *Use construction and design techniques that encourage sustainable forms of development and favour the retention of existing buildings with their historic associations and the energy already expended and embodied in their construction.*
 - *Ensure that the location is the most sustainable for development, taking the Water Framework Directive and environmental enhancement into account.*
 - *Flood risk is managed effectively and people and property are better protected*
 - *Ensure the consideration of flood risk in design and construction of development demonstrated through a flood risk assessment where required.*

9. Built Heritage

- Bromley does not do enough to promote its heritage and 'spread the word'.
- Text should refer to heritage assets on the at risk register, rather than “historic features” and an additional objective added

- *To address historic character and the wider historic environment through appropriate new development*

10. Transport

- Safe accessible uncluttered streets objective is welcomed. The problem for people with disabilities relating to shared space and street furniture was highlighted.
- The objective to encourage the use of public transport must be supported by improvements to the transport infrastructure.
- If cars are being discouraged and the rail system is at capacity, unless a viable alternative is found building more homes in Bromley should not be allowed.
- Should include improved rail/tram/DLR links, specifically rapid transport connections North and to the West i.e.
 - Bromley North direct trains to Charing Cross and Cannon street.
 - Extension of tram from Beckenham into Bromley Town and beyond, and / or Extend DLR from Lewisham into Bromley.
- Should include development of cycle lanes.
- Sustainable transport should be encouraged throughout the Borough, through redevelopment opportunities which enhance public transport facilities, improve access and facilitate linked trips through to mixed-use developments.
- The Environment Agency support objectives and suggest inclusion of the following objectives:
 - *Major development and or facilities should only be planned where they can maximise the use of existing public transport or secure new public transport facilities to and from major housing, employment, health, education and shopping.*
 - *Ensure improved accessibility to the public transport network by promoting bus and highway development and enhancing the frequency of public transport, wherever appropriate.*
 - *Support improvement to the quality of the network by the enhancement of facilities, infrastructure and user information.*
 - *Seek developer and other contributions to the provision of and improvement to the public transport system.*

Suggested Additional Groups of Objectives

' Lifetime Neighbourhoods'

The GLA suggest an additional objective regarding meeting ' Lifetime Neighbourhoods' principles as this may provide an overarching objective for many of the neighbourhoods' issues set out in each of the area profiles with the Core Strategy setting out how the different neighbourhoods will contribute to achieving the principles of Lifetime Neighbourhoods.

"Working with local people, businesses and partner organisations".

The Environment Agency comment that it is critical to the delivery of the strategy that actions and partners involved in delivering the Core Strategy can and should be identified, including local people, neighbouring councils, GLA, DCLG, authorities with environmental responsibility (the Environment Agency, Natural England and English Heritage) infrastructure and service providers, professional and trade associations and major interest groups. They suggest an additional group of objectives headed "Working with local people, businesses and partner organisations". With the following objectives:

- *Ensure all sections of society have opportunities to influence and know how to engage with Council in order to create better places and communities.*
- *Ensure that staff have the necessary skills to work with all sections of society to develop shared solutions to identified problems and to deliver the Core Strategy.*

“Accessible Bromley for all Disabled People”.

Disability Voice would like a clear commitment within the strategy for an accessible Bromley for all disabled people, constituting a strategic/ spatial theme in its own right, including written commitments to:

- *engage a Council Access Officer to champion the access needs of Deaf, disabled and older people*
- *a strategic approach to ensure continuity of access between future developments, so deaf, disabled and older people will be able to travel door to door safely and make full use of available facilities*
- *not only meet mandatory access requirements, but all developments to be constructed to BS800 (and future incarnations) and beyond as standard practice.*
- *require all developers to have to employ an Access Consultant*

Brief Summary of Pen Portrait comments

Total number of comments 221

A range of Neighbourhood issues (NI's) were put forward in the Core Strategy Issues Document. The consultation responses highlighted following issues :

Beckenham, Copers Cope & Kangley Bridge

No of comments = 7

The most important issue for this area was NI 3.2 'How can car parking pressure around stations and more densely populated areas be addressed?' was an important local issue and it was noted that suggestions included permit schemes, free park and ride schemes, and GLA suggested introducing Controlled Parking Zones (CPZ) in areas of on street parking stress.

The issue of residential development encroaching into business areas NI 3.1 was raised as important and it was agreed that higher density housing in previous commercial/industrial areas than redevelopment of residential streets with two storey buildings, and that where development takes place on sports grounds that conditions be placed that part of the site be given as a public part.

An additional issue we had not identified were environmental improvements of de-culverting the Chaffinch and undertaking associated biodiversity improvements.

Bickley

No of comments = 4

In response to NI 3.5 on 'opportunities to enhance open space for local community' suggestions included; de-culvert the river Ravensbourne in Whitehall Recreation ground. New provision including a pavilion and cafe for bowling club in Whitehall Recreation ground and youth provision in Whitehall Recreation ground.

It was felt that 'isolation amongst the elderly' (NI 3.6) should be addressed by services needing to take a proactive rather than reactive role.

There were 2 additional issues not identified in the Issues Document firstly that despite improvements in Whitehall Recreation Ground there were still concerns about the Ground.

And secondly that Homesdale Rd –Liddon Rd is defined as a business area; but there is significant doubt as to whether the designation of this land as a 'business area' remains pertinent to the current circumstances of the site and importantly Scotia Gas Networks are keen to work with Bromley Council to realise the redevelopment of their land.

Biggin Hill

No of comments = 15

The neighbourhood issues that raised most interest was 3.9 (with 6 responses) asking what 'opportunities arise to maximise employment potential in the light of its Strategic Outer London Development Centre (SOLDC) designation in the London Plan'. Responses ranged from the creation of an extensive business centre at West Camp, extension of the tramlink, and a development centre for avionics. Two companies established at Biggin Hill with over 50 employees between them (many of them local residents) support the LoCATE@BigginHill initiatives to raise the profile of the aviation cluster but felt the Core strategy document should clearly define the Council's commitment to plan for economic growth and investment in Biggin Hill and when it will have a positive local policy framework in place to unlock potential. Both are critical if the SOLDC's objectives are to be secured. Tatsfield Parish Council have concerns that in effort to maximise the employment potential of the area or to develop tourism, that we ensure that any developments proposed for the Biggin Hill part of the borough have due regard for the potential effect on the level of traffic using the narrow roads of Tatsfield. The GLA suggested that the Borough may wish to identify an appropriate spatial planning and investment tools to realise the potential of Biggin Hill.

There were 4 additional comments on issues not raised in the Core Strategy Issues Document (CSID), one requesting a Skate facility and outdoor gym at Biggin Hill Recreation ground and new allotment site required. Another pressing for an area action approach to incorporate the wider area around Biggin Hill to include housing, retail, leisure, social facilities, open space, transport 'it is important that the area is considered as a whole and not focused solely on the employment element'. A request that if housing is needed West Camp is long overdue for development- providing houses without a major impact on the green belt.

And finally from Batchellor Monkhouse – 'The Core Strategy Issues Document does not cover the need for more housing within Biggin Hill, although it does refer to a lack of social housing development. Residential development of suitable land within Biggin Hill area can create opportunities for new social housing as well as improved community facilities and an improved transport network. A review of the Green Belt boundary should form part of this work. This should include land that is well related to the settlement boundary of Biggin Hill and the A233 (London Distributor Rd). Our clients land off Belvedere Rd (4.5 hectare parcel of land to the south-east) would fall to be considered in completing that work'.

Bromley Common

No of comments = 10

The main issue commented upon was that of NI 3.16 in regard to access to nature and open space and how it can be enhanced responses suggested better lighting in Whitehall recreation ground, additional street trees to enhance green infrastructure, hedgerow planting and boundary improvements to Norman Park. The Environment Agency stated that the River Ravensbourne runs through Bromley Common and is classified as poor status under the Water Framework Directive. This area has the potential for improvement to help it reach good ecological potential. The Environment Agency would be happy to discuss the appropriate measures to improve the river, surrounding environment for people and wildlife.

On NI 3.17 'how can pockets of deprivation be addressed?' English Heritage stated that 'seek to ensure that any unidentified heritage assets and wider historic environment is considered for its potential to be a catalyst for regeneration and a stimulus for high quality design'. And Bromley College stated 'the London Plan places an emphasis on planning for high quality social infrastructure to assist regeneration. Bromley College can play its part by improving the quality and relevance of Further Education offer particularly if there are supporting planning policies should educational facilities be required'.

There were 2 additional responders on areas not identified in the CSID; comments included the need for enhanced play provision required in Norman Park; potential woodland burial site, protect woodland at Parkfields and manage under Higher Level Stewardship funding.

And finally for Bromley College a key issue is the designation of the site as part of Metropolitan Green Belt. This designation imposes significant restrictions on proposals for future development/floorspace at the Campus. The council should review the appropriateness of existing green belt boundaries. Alterations to the green belt could be made that support policy objectives of the CSID, including improving the social infrastructure, tackling deprivation and wider regeneration objectives.

Bromley Town

No of comments = 10

The main issue was 3.21 on the 'implications of growth in the town centre for the suburban character of nearby residential roads'. There were 2 responses one referring to Site A in the Bromley Town Centre Area Action Plan, stating that as site A will impact on the local community that therefore the character of residential built environment needs to have influence on design and density of any new development. And Capital Shopping is keen to highlight that the 'area for growth within town centres' is already established within the BTCAAP. As such, the implication for the character of suburban areas should be managed through the development management process and not duplicated within the Core Strategy. CSC suggests that this is explicitly clarified within the Core Strategy. CSC considers that it is essential to ensure that there is continual evolution and growth within BTC.

Additional comments- 6 responses covering various unidentified issues:-

1. Consideration needs to be given to the need for secondary school places in the north of the borough, ..the pressure on primary places continues to increase.
2. The area around Bromley Empire Cinema is shabby and run down. The cinema in particular needs a major overhaul.
3. Potential enhancement of the A21 through additional sponsorship opportunities (ie for green infrastructure);improve character of area by policy of tree lined streets & improved signage ; additional tree coverage at College Green; new play provision at Queens gardens; new youth provision (skate area) at Church House Gardens ; De-culvert the river Ravensbourne at Queensmead; undertake repairs and improvements at Mill Pond, Church House Gardens; Creation of a green walking/cycling route from Keston to Bromley Town Centre and beyond towards Lewisham.
4. Council has out of date policies for primary shopping frontages and lack of evidence to continue with them. BTCAAP does nothing to address this matter- the intention is to use UDP policies S1, S2 and S3 as part of LDF- despite lack of evidence. These policies are out of step with Government policy and should be reviewed. The focus should be on the quality of the occupier, not on maintaining an arbitrary level of use class. Keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy.
5. Parking issues in the town centre- CSC has ongoing concerns about insufficient parking across the town centre. This problem is likely to be further exasperated with the further planned loss of parking within the town centre. CSC considers that alternative parking solutions, as well as sustainable transport initiatives should be considered e.g. provision outside of BTC through park and ride schemes. CSC welcomes the opportunity to look at parking more holistically across the Borough through the Core Strategy. CSC also note that congestion is a problem within BTC - CSC consider that a holistic transport strategy addressing transport modes and parking should be incorporated within the Core Strategy.
6. GLA- As BTC is a major transport hub, TfL would suggest a key challenge should be 'how growth can be accommodated and sustained', such as through the provision of new infrastructure, etc.

Chelsfield, Green Street Green & Pratts Bottom

No of comments = 3

NI 3.24 on 'how can the benefits of excellent transport links to London and the M25 be maximised' the response from GLA was that 'there is very limited opportunity to improve rail services at Chelsfield because of the constrained two-track railway between Orpington and Sevenoaks. However, there may be opportunities to improve links to the rail station to make it more attractive to passengers'.

Neighbour hood issue 3.25 asked about potential to enhance recreational areas and

Additional comment - Chelsfield Park Residents Association- requested they be included as an Area of Special Residential Character (ASRC) designation. A previous application was deferred- they are that further delays may be caused by the LDF consultation process and are further concerned that the designation of ASRC may even be abandoned when the LDF is finalised.

Chislehurst

No of comments = 8

All issues that were identified were agreed with by the Chislehurst Society and further close working with the Council was welcomed. Specifically for issue 3.33 on 'protection, access and management of commons etc be enhanced', the Society noted that the CSID notes do not reflect that many organisations devoted to the maintenance and upkeep of our open spaces (Trustees of the Common, Friends of the Recreational Ground, National Trust and, Friends of Scadbury)– your questions imply there are issues it would have been helpful if you had indicated what they are- the note should be amended to recognise the important work these groups do. There are two key shortages that limit their ability to enhance the protection access and management of the open spaces; funding, and the level of volunteering from the

public. Another responder thought that there could be improved partnership and cooperative working between all land managers.

Additional comment. Leisure and Heritage improvements could include an installation of BMX track at Walden Woods and the Heritage conservation of the moated manor at Scadbury Park.

Clockhouse, Elmers End & Eden Park

No of comments = 11

Neighbourhood issues identified in the CSID were all supported. It was thought NI 3.34 to be important for the character of the area that new residential development should be predominantly traditional housing rather than flats. It was considered that more investment would improve recreational, sports provision and allotments (NI 3.36), with suggestions for amongst others an installation of an outdoor gym at Harvington and at Croydon Rd and an installation of a youth facility at Churchfields.

On the question of 'what opportunities large vacant business sites offer?' (NI 3.38) Signet Planning came forward, on behalf of Altessen who own the remaining part of the former Glaxo Smith Kline site, they are seeking to re-develop this site within the lifetime of the Core Strategy. They consider the site is suitable for redevelopment for a residential led scheme as the site is no longer listed as employment for rating purposes. The site could provide recreational and sporting facilities that could be made available to the local community as well as improving the Beck environment and nature conservation.

A further 3 additional comments were received concerning provision for teenage recreation is limited leading to teenagers hanging out in green areas with little to do. Parks for younger children have been developed, something for teenagers like youth clubs and a skateboard park would be very useful and prevent the build-up of antisocial behaviour. There could be a timber station provided at Harvington.

Finally a point was made that in the re-development of shop fronts, or any change of use, planning permissions should include refurbishment and upkeep of the space between the shops or other uses.

Cray Valley, St Paul's Cray & St Mary Cray

No of responses = 20

All issues raised in the CSID created a positive response, indicating the identified issues were correct. NI 3.40- Asked 'what opportunities arise from the identification in the draft London Plan of parts of the Cray Valley as "Areas for Regeneration", to address the issues of multiple deprivation?' there were 3 responses. One stated that the return to the valley of Cray Wanderers and the creation of a sports village would generate a sense of identity and act as a focal point for the area. English Heritage sought to ensure that any unidentified heritage assets and wider environment is considered for its potential to be a catalyst for regeneration. And finally it was pointed out that efforts to address multiple deprivation must take account of the particular needs of the settled Gypsy & Traveller community.

NI's 3.41 & 42 on the question of improvement of housing stock, and was residential development desirable or needed? Drew a reminder from the GLA that loss of housing, particularly affordable housing should be resisted in line with the London Plan Policy 2.41.

NI 3.43 questioned were there opportunities to address employment needs through changes to the business area? Responses included supporting the flexibility to shift to retail and other commercial activities to better serve employment objectives and economic output, and agreeing that there are opportunities to address congestion and parking related to commercial activity through redevelopment by improving sustainable transport options. The rest of the responses were site specific:-

Crayfields Business Park- St Paul's Cray is currently designated a Business area with a finger of land designated as green belt currently occupied by a bowling club- it has become clear that in order to ensure the employment area is able to respond to the market demand for industrial and business units, the green belt area of land between the two parts of the business area needs to be included within the employment designation- as part of re-

development, it is proposed to re-locate the bowling club facilities on nearby land within Legal and General's ownership

Scotia Gas Network advised that due to changing methods of gas distribution being introduced the gas holder at St Mary Cray may be decommissioned prior to the end of the plan in 2031. Should this site become available for development in line with London Plan expectations to contribute towards the overall Industrial Business Park, the Core Strategy should actively encourage the production of an overall Development Brief to establish the key spatial planning principles for how the continuing shift from industrial to alternative commercial uses, including retail.

Klingers site - RPS on behalf of IKEA reminded that Core Strategy should be consistent with existing and emerging national planning policy which supports a flexible approach to employment creation through the development process. IKEA have a long standing interest in a developing a store in this area and are keen to open in this location at the earliest opportunity. If there is a demand for retail development in the it should be supported and potential sites allocated, particularly in established retail locations. A criterion based policy framework, reflecting the potential for a range of appropriate uses in this area would enable individual proposals to be considered on their own merits. This would allow Bromley to respond and adapt to evolving economic circumstances and pro-actively support sustainable growth through employment creation.

NI 3.45 on 'community engagement through enhanced leisure and social activities, especially young people' brought forward the responses of the creation of the Sports Village in the Cray area, and possible installation of child & youth provision at Riverside Gardens with the conversion of the redundant paddling pool to a sand play area and a BMX track, and the creation of a skate park at St Mary Cray Recreation Ground to name but a few ideas.

NI 3.46 on 'effective use of existing community venues and open space to support regeneration efforts' brought the suggestion of increasing usage at Duke youth centre to include GP information advice and classes such as yoga & fitness etc.

NI 3.47- It was clarified that issues for the wider community were the same for Gypsy and Travellers including accessing health, education and other community facilities.

The 2 additional comments reiterated points raised at NI 3.43 above, briefly: –

1. It is a stated objective of the Cray Wanderers to return to the Cray Valley benefits from this proposal inc training and academies for the club (youth teams, local clubs and groups) – generating a sense of local identity – focal point and driver for change-development of a sports village- mixed leisure/community and commercial, inc fitness club and sports arena.

2. Crayfields Business Park- St Paul's Cray is currently designated a Business area with a finger of land designated as green belt currently occupied by a bowling club- it has become clear that in order to ensure the employment area is able to respond to the market demand for industrial and business units, the green belt area of land between the two parts of the business area needs to be included within the employment designation- as part of re-development, it is proposed to re-locate the bowling club facilities on nearby land within Legal and General's ownership.

Crystal Palace Penge and Anerley

No of comments = 30

NI 3.51. It was generally thought that following the 'Area for Regeneration' being identified in the London Plan this would lead to improvements in the area. The Crystal Palace Triangle Planning Group responded that unemployment in Crystal Palace is by far the highest in Bromley. The map and table of Bromley local centres should show the full geographical extent of the Triangle District Centre, including the Croydon and Lambeth parts. Finally the Church Road side of the Triangle is in need of regeneration, and there is scope for enhancing Church Road as a retail frontage.

NI.3.55 It was considered that whilst there was a need to increase family housing in the area, there was limited opportunity with too many one and two bed flats but that the quality of the existing stock could be improved.

NI 3.56 The pressure on local parks could be alleviated it was suggested, by not developing a football club in Crystal Palace Park. Generally it was thought that the parks were not used in a

positive way and lacked facilities. Some suggestions for improvements were the installation of natural play facility in Royston Field, improved heritage feature in Penge Recreation ground, develop walking routes between Penge parks, re-develop community facilities (nursery/pavilion) and BMX track in and finally the restoration of canal and associated ecological improvements in Betts park.

NI 3.57 asked 'what is the future for Crystal Palace Park?' was considered an important local issue and there were 8 respondents.

Regarding the Masterplan it was thought to be a mistake to assume that the Masterplan has legitimacy in terms of public support. 'It is crucial that the vision for the Park, as determined by the Trustees, has enthusiastic public support and that the company appointed to undertake revenue generation has sound commercial credentials. Of course revenue generation will require infrastructure which will include an extensive pavilion and car parking facilities'.

Whilst 3 other respondents were strongly against the Park becoming a sports facility for a major local football club, it would have a seriously detrimental impact on the local community, destroying the experience of visiting the park, with a loss of additional park green space.

A consultation with both sides of the argument should be held. It was strongly felt the park was for use of the whole community and Regeneration of the park in keeping with its current community use would be welcome- keeping and improving the Sports centre and Athletics track.

WBRA want to see a vibrant park meeting the needs of the modern day family and do not want to see it developed for housing or other urban development, even to pay the costs of redevelopment of the park itself.

Crystal Palace Triangle Planning Group – Any use within or adjacent to Crystal Palace Park should only be accepted if it is compatible with public enjoyment of the Park. Additionally possibilities should be pursued with regeneration partners for the implementation of non-controversial improvements to Crystal Palace Park.

Finally Crystal Palace Football Club strongly believes that the proposal of a football club in Crystal Palace Park represents a truly unique opportunity that would bring significant benefits to both the immediate and wider area. A stadium can help breathe new life into both the sports centre and the park providing significant social, environmental and economical enhancements to the benefit of the community. A football stadium at Crystal Palace would be subject to an extensive planning application process.

NI's 3.58 and 59 on 'how can the public realm be enhanced' and 'opportunities to improve the attraction of Penge town centre and pedestrian environment' attracted the same response of 'more trees' and generally more support for local businesses and less larger chain stores. More specific suggestions were to pedestrianise completely the area by the Crooked Billet pub; buses can go down the High Street and stand/turn with the 176s on Croydon Road; have a few market stalls under the clock tower at weekends and expand the alfresco dining offering.

NI 3.61 asked how 'public transport links to Bromley Town Centre could be improved' and a suggestions included, an additional bus service along Elmers End Rd, Annerley Road and Annerley Hill , from Beckenham and Bromley centres, (the replacement of the 361 removed many years ago) would greatly enhance the accessibility of the Crystal Palace area to and from Beckenham and Bromley. And an extension of Tramlink to Crystal Palace.

There were 2 additional comments on issues that had not been identified in the Core Strategy Issues Document:-

The GLA explained that the 'Mayor has recently announced the further development of plans for the extension of the Tramlink network to Crystal Palace, and so TfL would recommend that the statement at para 3.1.10.14 'Plans for the extension of the Tramlink to Crystal Palace are unlikely in the short term' is refined to take account of this'

And the Crystal Palace Triangle Planning Group pointed out that the Crystal Palace District centre and the Upper Norwood residential area are distinctive from Penge and Anerley. And that the Core Strategy should recognise its wider function by designating the Church Rd Shopping frontage as an integral part of the Crystal Palace Triangle District Centre.

Darwin & Green Belt Settlements

No of comments =5

NI 3.62 asked 'what are the trends in the rural economy and what opportunities are presented by redundant buildings in the Green Belt? There were 2 responses, one stating 'presently the future is bleak. Very little 'real farming' is taking place. With regard to redundant farm buildings, conversion to small light industrial, warehouse or office use is perhaps most appropriate where there is reasonable vehicular access. Otherwise conversion to residential', And the other making the suggestion that there may be opportunities to bring buildings at High Elms into usage as a rural craft flagship centre.

NI 3.65 asked 'how can issues relating to Gypsy and Traveller pitches be addressed?' The 'Gypsy & Traveller Project' replied that there are a number of pitches along Layhams Road which only have temporary permission. These travellers are established in the area with their children in schools just across the borough boundary in New Addington. In the absence of any new pitches in the vicinity these temporary pitches should be made permanent to meet the demonstrated need.

NI 3.66 'What challenges are presented by the subdivision and sale of farmland' a suggestion was made to investigate opportunities for land acquisition by LBB to prevent development, increase public open space and enhance maintenance and biodiversity.

There were 2 additional comments on issues that had not been identified in this area:--

1. Investigate options for 'Quiet Lanes' installation of vehicular restrictions. Potential Woodland burial site at High Larches. Biodiversity enhancements and improvement throughout green belt area, and a natural play facility at High Elms Country Park.
2. There are possibilities for sustainable development to south west of the borough close to New Addington associated with an extension of the tram line. However this needs to be considered in the round and included in a thorough review of potential and green belt suitability.

Eastern Green Belt

No of comments = 2

There were no comments on neighbourhood issues regarding employment opportunities, protection of the green belt and sustainable farming, recreation facilities, but there were comments on NI 3.72 'opportunities to support the Green economy and does it present opportunities for the landscape to be improved or enhanced?'. The responses were that in the eastern green belt there was the potential site for timber station; partnership working with private landowner to provide (legal) off road motorcycling facility, and to investigate options for Quiet Lanes; and the installation of vehicular restrictions.

NI 3.73 – 'How can the particular issues relating to the travelling Gypsy and Traveller community in this area be addressed?' One response received stated there are 2 pitches in Hockenden Lane with only temporary permission. In the absence of available pitches these should be made permanent. There are 2 authorised sites in the area Old Maidstone Rd and Star Lane. These are well occupied. Over the period of the Core Strategy (20 yrs) there will be significant pressure for additional pitches from within the existing Gypsy and Traveller community as children grow and have their own families. The Core Strategy must show how the additional; pitches will be provided by the expansion of these existing sites or providing a new site.

There were no additional issues raised for this area.

Farnborough and Crofton

No of comments = 16

NI 3.74 'What opportunities exist to improve the availability of primary healthcare?'- comments received requested that following the merger of the Crofton Road and Starts Hill surgeries bus services to and from the new merged operation should be improved to allow better access. The South London Health Trust stated they are considering all of their options to make better use of the PGMB Education Centre and Day Surgery Unit at Princess Royal University Hospital. Additionally the Healthy Urban Development Unit – encourages dialogue

around the implications for the core strategy of the NHS South East QIPP Plan and the emerging estates strategy.

NI 3.75 on the issue of parking pressure around the Princess Royal University Hospital responders were divided that no further provision for parking should be made at the hospital and a long-term goal should be to reduce parking and instead the bus services to and from the hospital should be substantially improved so there is less incentive to travel to and from the hospital by car. Whereas two respondents suggested that an attractively designed second deck could be provided above part of the existing car park, the design needs to be good (Local residents would not accept a unit similar to that constructed at Tesco, Elmers End) with the aim of trebling the current parking provision.

The South London Health Trust stated they are considering all of their options to make better use of the PGMB Education Centre and Day Surgery Unit at the Princess Royal University Hospital.

NI 3.76 asked 'what is the scope for community groups to assist in improving their environment?' and the suggestions were developing a 'Friends' group for Crofton Heath area and advising to investigate opportunities for land acquisition at Crofton Heath, to prevent development, ensure public access.

NI 3.77 on the issue of 'future challenges are posed by Biggin Hill Airport was considered very important to local people and brought 4 responses all wanting to strongly resist any proposals for development at the airport which would make any increase whatsoever in the present level of noise, this included expansion in anyway, neither in amount of air traffic or opening hours...pollution from it has got steadily worse. There was also a suggestion that Biggin Hill could be converted into an air museum and conference location, which would bring more jobs, visitors and help to the local economy.

Additional comments -Two further issues raised concerned young people in the area with 'Youth disorder is a constant headache in the Crofton area. There is a lack of visible policing, and very little for teenagers to do in the evenings - the end result is disorder and petty vandalism which spoils the feel of the area for all residents. More needs to be done to provide constructive activities for young people in Bromley. A suggestion was made of installing an out door gym at Farnborough Recreation ground.

Hayes

No of comments = 8

NI 3.78 This issue asked if there is a need for improvements to public transport with other parts of the Borough? Suggestions included 'Develop walking routes through privately owned land (Rookery Estates). Improve local public transport connectivity; there is presently no bus link to Beckenham or West Wickham, link to West Wickham would be needed as a minimum.

NI 3.79 on opportunities to improve services and facilities for the elderly Hayes Village Association suggested that the demolition of 47 flats at Hayes Place from being prevented.

NI 3.80 on the 'need to address starter homes and accommodation for the elderly', Hayes Village Asscn commented that there is no suitable accommodation for housing elderly people within the community

NI 3.82 'Can any of the problems of with on street parking in some residential roads be addressed and the Hayes Village Association suggested 'enforce the existing parking restrictions'.

Additional comments- 2

1. Hayes Village Association said the south part of the High Street badly needs improving to make it, shopper, business, and visitor friendly. The pavement on the east side needs to be wider, and trees along both pavements would help to make it a more attractive place. The commercial activity schedule should include the George Inn, the farm, the car showroom on Hayes Street and the Petrol filling station at Station Approach.

2. Cllr Manning suggested that the empty office block, Global House in the car park behind Station Approach could be converted to residential use. If UNITE were to vacate their building, there is also potential for the building to be converted to housing or hotel use?

Keston

No of comments = 9

NI 3.85 This issue asked about whether the local shops and facilities on Heathfield Road can be protected. The responses suggested that steps should be taken to restrict vehicular traffic through Heathfield Road. The frontage of the shops on the NW side of Heathfield Road is wide enough to enable a small carefully designed pull-in for several cars to park whilst purchases are made. Parking time would need to be strictly limited to 10 minutes, helping to strengthen the retailer's opportunities to build their businesses. Shops in Heathfield Rd must be protected in a way that allows them to survive to serve the predominantly older population; the village store and Post Office are invaluable. The way to protect these facilities is through appropriate and sensitive planning regulations.

Additional comments. 7 including the creation of a green walking/cycling route was suggested with a route running from Keston to Bromley Town Centre and beyond towards Lewisham. Potential development of angling facility/management at Keston Ponds.

A request that the Green Belt should be reviewed and consideration of the removal of the garden centre from the Green Belt designation as it does not fulfil the objectives of PPG2. The Council should allow greater flexibility for previously developed land within the green belt to meet housing need. It was argued that the Issues Document pre-empts that Keston is not considered a suitable location to accommodate any future housing provision; it appears to be a pre-emptive decision that gives weight to the protection of MOL and the Green Belt. It was not considered that the current approach to Keston provides for the opportunity for future people to live in the community. Also the 'Drift' site in Keston is considered to be a suitable size to accommodate future residential development.

There is a need to plan for the Burial needs of Keston and the wider area in the Core Strategy. The provision of a burial ground in the green belt adjacent to Keston would be appropriate.

It was pointed out that a recent application at a Gypsy and Traveller site in Keston for 8 extra caravans was refused and will be going to appeal; this indicates the continuing need for additional pitches.

Mottingham

No of comments = 4

NI 3.87 What opportunities arise from the identification in the draft London Plan of parts of Mottingham as "Areas for Regeneration", English Heritage are keen to ensure that any unidentified heritage assets and wider historic environment will be considered for its potential to be a catalyst for regeneration and a stimulus for high quality design.

There were no additional issues raised.

Orpington, Goddington and Knoll

No of responses = 19

The most important issue was NI 3.94 'how can Orpington's role as a town centre employment focus be maintained and enhanced'? Comments included making more use of the village hall for bands and musicians to perform. A new cinema was also seen as a good idea as would be the upgrade of the Walnuts sports centre.

The Orpington masterplan raised the possibility of a new entrance to the leisure centre which was seen as important to enhance the town centre and increase footfall. It was also highlighted that the car park of Orpington College and Orpington hospital could be utilised for future development potential.

Three additional issues included redevelopment of the Pavilion at Goddington Recreation Ground. Redevelopment of Priory Gardens; landscape and depot including toilet/facility block. New youth provision (skate park) and expansion of allotment site at Poverest recreation ground.

Another respondent highlighted that setting targets which would exceed London Plan or National Standards would hinder development which might come forward in the future which would in turn frustrate Bromley Town Centres aspiration to remain competitive with surrounding centres as well as London.

South London Healthcare Trust have given notice to NHS South East Sector that they will be withdrawing their services from Orpington Hospital with effect from the 1st April 2012. Services are dwindling at Orpington Hospital and the number of patients being cared for on site, are not commensurate with the NHS resources being consumed. Following the planned closure of Orpington Hospital, options for relocation are being considered. NHS South East London sector will be relocating some services in Orpington, and other Trust Hospitals. The PRUH will be retained as a major centre for clinical care.

Petts Wood and Surrounds

No of comments = 10

Petts Wood Residents Association (PWRA) have made several responses in respect of NI's 3.99-3.103.

NI 3.99 - 'What opportunities exist to improve the traffic flow around Petts Wood Railway Station and how can car parking be better managed?' the PWRA review highlighted there should be an on-going examination/review to address residents issues with commuter parking.

NI 3.100 - 'How can the vitality of Petts Wood as a retail centre be supported and enhanced?' Residents highlighted that there are too many cafes and restaurants in Petts Wood and the Core Strategy should incorporate policies to restrict an over representation of a certain use class if necessary.

NI 3.101-'How can the development over time be managed to maintain the suburban residential character of the area? A visual statement is highlighted as being beneficial for the areas when designating Areas of Special Residential Character (ASRC). Whilst the one metre side space policy in the UDP is in place for 2 storey extensions could this be expanded.

NI 3.102- 'How important is space to the side of dwellings and back gardens in retaining the character of Petts Wood and Surrounds'? Some residents have sought to over develop their properties. Maintaining a refusal to grant planning permission for backland development is key to the retention of the area.

NI 3.103- 'What are the implications of the growing numbers of cafes and restaurants'? This NI was stated as an area of concern for many residents. It is viewed by residents that there are too many cafes and restaurants in Petts Wood high street. It is perceived by some that this has led to an increase in crime and anti-social behaviour. Policies should be put in place to ensure there aren't an over concentration of cafes and restaurants but a preferred mix of shops. Having greater consistency when granting premises licences may help to address this problem.

There were four additional comments. Some of the main comments included building a replacement pavilion at Willets Recreation ground and creating a new Petts Wood Road to Franks Road to alleviate congestion at Tudor Way. It was also highlighted that Randolph Road, Bromley could be used as a suitable site for residential development.

Ravensbourne, Plaistow & Sundridge

No of comments = 10

The most important issue for this area was NI 3.108 'what contributions does the Bromley [North-Grove Park branch line make to the area and can it be better utilised'?. Of the respondents several said that the branch line is key and even ask that Network Rail think about accommodating 'through trains' during commuter periods to help local residents around

Bromley North. Other suggestions include introducing a farmers market at both Bromley North and Grove Park stations and utilising very picturesque commercial premises.

There were two additional comments. It was highlighted that increased number young families in the area meant there are issues for education there is also a need for more and enhanced play areas and other facilities e.g. toilets near the playground off Burnt Ash Lane.

The second additional issue highlighted development of Brook Lane Community growing project. Enhance play facilities and extend Plaistow cemetery at Kings Meadow to increase burial provision and improve recreational use. Investigate options for east-west link through Sundridge golf course (ALGG).

Shortlands & Park Langley

No of comments = 11

In response to NI 3.109 'how can the distinctive character of the area best be maintained' suggestions included maintaining ASCR's designations and extending or creating new conservation areas to preserve the attractiveness of Edwardian and Victorian properties.

In response to NI 3.110 suggestions included resisting development where Edwardian or Victorian properties are to be demolished & maintaining open spaces which make such a vital contribution to the streetscene.

Regarding NI3.111 'are there any additional issues which we have not identified' suggestions included seeking opportunities to exploit the existence of St Peter's Hall which can accommodate large and small groups. It has also been highlighted that the redevelopment of Langley Court presents the opportunity to provide future community facilities.

There were 4 additional comments covering various unidentified issues:-

The first requested that the north eastern boundary be redrawn to the north eastern boundary so that it ran along the line of A21 London Road. There is of course the total lack of secondary schools in the area but we recognise the difficulty of providing one. Another response called for the installation of sculpture/nature trail at South Hill Woods and Mill Pond. Another respondent identifies that whilst properties generally have large private gardens, the majority of the area has limited access to public open space. The pen portrait acknowledges the vacant Langley Court site as lying within the neighbouring Eden Park pen portrait. However, the site also lies geographically adjacent to the Park Langley/Langley Park areas and therefore any opportunities/facilities provided by the redevelopment of this site (Langley Court) would be relevant to the residents of these neighbouring communities. The site should be viewed in the context of both pen portrait areas.

West Wickham & Coney Hall

No of comments = 9

One of the main issues raised was NI 3.115 on the issue of All Saints/John Rigby School site. One respondent called for the existing building (despite its Green Belt location) to be converted or replaced for housing/employment/business opportunities whilst another respondent highlighted that future development could be restricted due to the sites designation.

There were five additional comments including that there was no mention of the new Hawes Down Centre in the CSID; a suggestion to install youth facilities (ball court) in Coney Hall Recreation ground and Improve sports and play provision at Blake Recreation ground. Cllr Manning suggested that 'As for possible future development – negligible due to large amounts of Green Belt, although the former All Saints School buildings/site are empty, while in the green Belt.

Finally the Environment Agency stated that the River Basin Management Plans have a Programme of Measures setting out objectives for water bodies to achieve good ecological status- the borough has a high reliance on its groundwater resources (e.g. it is the main source of potable water for the borough, and feeds the boroughs watercourses), we will expect more detailed reference to the Water Framework Directive to be made within the actual Core Strategy and supporting documents.

Living in Bromley

No of comments = 168

Retaining distinctive character and quality of life and supporting the improvement of less attractive areas

It was noted that better shops, encouraging small businesses and the protection of open space is key to maintaining the desirability of the Borough. Preserving the Green Belt, Metropolitan Open Land and open space should also be a priority. The following designations were highlighted as needing protection:

- Conservation areas
- Areas of special residential character
- Sites of special scientific interest
- Local nature reserves
- Scheduled ancient monuments
- Sites of interest for nature conservation

It was also noted that farmland should not be broken into pockets of unrecoverable investment land.

English Heritage highlight that the conservation of Bromley's particular character is a key issue for the Borough. They suggest that Section 4.1 of the document could articulate the Borough's historic character as an appropriate introduction to Issue 1.

It was suggested that Bromley as town needs to offer better infrastructure particularly in terms of leisure. This could include improving the shopping centre to what it was 5-6 years ago i.e. before the demise of Allders and House of Fraser and the establishment of a large Primark (attracting less affluent shoppers). This has had a detrimental effect on restaurants, bars and cafes. It would be advantageous if the Council could encourage smaller businesses (cafes and shops with home ware).

New Housing and Supporting Infrastructure

It was noted that the majority of new development will have to come from the north of the Borough and provide mixed tenure schemes where opportunities arise i.e. Blue Circle, Horkam and Alkon towers. Existing brownfield or derelict sites should be used as a priority. It was considered that disused poor quality industrial land should be considered for housing purposes and facilities (including housing) should be spread all over the Borough. It was also suggested that housing should be kept to brownfield sites within existing residential areas.

It was noted that housing should be provided in locations which can accommodate growth without harm to local historic character. In addition this new development should take into account the provision of infrastructure, business premises and churches. One point was raised that it would be preferable to sacrifice an element of the Green Belt (2.5%) rather than compromise character and quality of life in areas already full. In addition to this another point was made stating that Green Belt hamlets should be expanded and identified as villages.

It was suggested that new housing would be best accommodated near transport links but new infrastructure is required to support the growth in the number of homes. It was suggested that there seems to be a reliance on Bromley South Station in terms

of transport infrastructure. This situation could be improved through making improvements to Bromley North and extending the DLR.

Overdevelopment of the area (relating to Aperfield Green Belt Action Group) is considered a danger to the quality of life and infrastructure of the area and has already started to lead to more noise and anti social behaviour changing the quality of life for many.

The Greater London Authority highlighted that the estimated capacity for 470 dwellings per annum is below the 500 dwelling per annum annual monitoring target in the London Plan which the Borough should seek to achieve and exceed. The Borough's intention to promote new, higher density development in Bromley town centre in accordance with the AAP is welcomed. Later drafts of the core strategy should address the issue of residential density and seek to optimise housing potential. The Borough should ensure all new developments optimise housing output, taking into account local context and character, by incorporating the density ranges set out in table 3.2 of the London Plan in line with Policy 3.4 of the London Plan.

It was acknowledged that housing policies need to reflect a mix of housing types, tenure, reflect need and requirements and show how these will be met across the whole Borough. CSID has no clear substance and the Draft National Planning Policy Framework and PPS12 require core strategies to set out how much development is intended and when and how it will be delivered.

It was highlighted that a SHMA has not been produced to address the emerging requirement of the DNPPF and need throughout the Borough. It is important to show the right amount of housing, at the right time, in the right place to support a range of affordable and open market housing. This is necessary to ensure, in accordance with paragraph 9 PSS3 that 'everyone has the opportunity of living in a decent home, which they can afford in a community where they want to live'.

It is considered that the market for flats outside of prime central London locations remains very weak, and have significant upfront funding requirements that are difficult to find sources for and most such sites therefore have very questionable viability. It is therefore imperative that an undue reliance is not placed on flatted schemes. Sites need to be found for standard family housing which funding is available for, a market for the product exists and has a real prospect of actually being built. This coincides with the needs and desires of the population generally and indeed with the profile in Bromley. It is worrying that the consultation refers at paragraph 4.1.9 that there is capacity for 470pa with 40% of that in town centre flats at high densities. This is not stated as a proposed policy but it is evident that there needs to be a radical change from this to deliver the established scale of housing required.

It was stated that a Borough wide SHLAA has not been produced and the Council's five year supply paper does not include a trajectory that extends to 10-15 years as required by PPS12 paragraph 55. Without an available evidence base it cannot be determined if the housing requirement is deliverable or where suitable locations may exist to provide such growth, and therefore the core strategy is considered unsound.

It is considered that the amount of housing needed is regarded as a primary matter and the requirements set out in the London Plan need to be met (figure of 565 / annum quoted in one instance). These are not just targets to be aimed for. The Core Strategy needs to set out a timescale up to 2027 in terms of addressing future housing supply. The NPPF has been confirmed as a material consideration and is a

clear indication of Government Policy that aims to increase housing significantly. It also requires an additional 20% to be added to any five year supply of deliverable housing. It is important that the right type of homes are actually built and not just planned.

In terms of housing provision the CS only refers to provision over the next 10 years, not the next 15 years. The London Plan and PPS12 (para 4.13) specify that LDFs must provide 15 year targets. The requirement in the CS should be 15 x 500 dpa starting from the date of adoption. Paragraph 4.1.11 of the CS refers to new households, migration and 4,000 households experiencing housing difficulties. The identified future requirement far exceeds estimated capacity and there is no indication how meeting this requirement would impact upon existing policies / issues. The CS does not consider any alternatives to the current approach – i.e. increasing the annual target of 500dpa. Although a five year supply paper has been produced the number of dwellings identified is not realistic based on historic levels of performance.

The Highways Agency's interest in Bromley's Core Strategy relates to the potential impact of proposals on the safe and efficient operation of the M25, in particular junctions 3 to 5. These junctions experience high levels of congestion particularly during peak periods. We would be concerned if any material increase in traffic were to occur on these sections of the SRN as result of development in the London Borough of Bromley without careful consideration of mitigation measures. Important that the Core Strategy provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Disability Voice Bromley (DVB) highlighted that new and re-developed housing should be built to Lifetime home standards/design criteria and other developments should also include access requirements as well as design standards. Many disabled people find locating accessible properties a difficult and frustrating process. Given that only 15% of properties in England and Wales are accessible, the strategy should include targets and measures. Bromley should sign up to the London Accessible Housing Register (LAHR), a framework developed to make better use of accessible housing stock giving disabled people informed choices about how and where they live. DVB suggest that this is added as a target for 2012/13.

Various sites listed as 'suitable' for housing / SHLAA including;

- Bromley Town Centre
- Site L Westmoreland Road
- Langley Court subject to discussions (include in any future SHLAA)
- All Saints (former John Rigby Secondary School)
- Land south-west of Randolph Road Bromley
- Land to the south-east of Belvedere Road Biggin Hill
- West Camp
- Global House, Hayes
- Empty office block in LBB car park behind Station Approach
- Unite (housing/hotel?)
- Keston Garden Centre

Biggin Hill was identified as an area for potential growth but transport links would need to be improved. Providing more housing in Biggin Hill would help to support the economy and attract business into the area.

Provision of housing to reflect the varying needs of the Boroughs' population.

It is considered that by actively supporting retirement housing larger properties can be released back into the housing market and make more efficient use of the stock. There is a need to plan for specialist retirement homes (possibly within the Green Belt). Significant emphasis should be placed upon the ageing population, the underlying demand for owner occupied retirement housing is currently substantial and will grow in the future, suggesting the need for substantial growth and more dwellings that reflect the demographic shift in the population are needed.

The Greater London Authority specify that affordable accommodation to meet the needs of older Londoners is supported in the London Plan and the Borough may wish to address this issue in later drafts of the CS. None of the strategic issues raised at the end of this chapter directly address affordable housing which is a significant omission. Later drafts of the Core Strategy should set out the Borough's approach to affordable housing, taking into account the recent changes to PPS3 and indicating how much affordable housing will delivered in the plan period.

It was noted that the Council's affordable housing policy should be flexible to allow provision to be provided on site in the first instance but also off site or as a payment in lieu in exceptional circumstances to reflect varying residential characteristics and the need in some areas for regeneration.

Designations in the Draft London Plan

The Borough should accept the work done for the London Plan.

English Heritage highlight that in relation to Areas for Regeneration any identified heritage assets, and the wider historic environment, is considered for its potential to be a catalyst for regeneration and stimulus for high quality design (PPS5, HE 3.1).

Implications of the ageing population for Bromley's places

The following issues were identified; a need for more burial space, a need for more specialist housing and care facilities and specialist retirement accommodation may need to be provided within the Green Belt (given the limited land available and distribution of the ageing population).

It is considered that an ageing population will place increased demands for the "care" aspects of Local Authority social service obligations. There will be more single occupancy residents requiring supplementary support for their relative self-sufficiency and more demand for social accommodation from the less able.

It was noted that with an ageing population there are no private assisted/extra care housing schemes available in the Borough. This forces vulnerable elderly residents to stay in their homes when they don't necessarily want to, leaving them lonely and afraid. Suitable private assisted living housing schemes need to be encouraged.

Challenges for young people

It was suggested that young people face various challenges including unemployment, lack of opportunity and boredom. One of the main challenges for young people was cited as the ability to buy their own home. The Borough should therefore provide support to developers/housing associations in developing more homes. It is also important that Bromley supports the new initiatives aimed at helping

people buy their first home. With the national average age of first time buyers over 37 years, it will be important to find opportunities to help younger people through low cost home ownership schemes and intermediate rental products.

Sufficient school places were highlighted as a challenge in addition to the need to provide good training opportunities. Greater social integration is seen to be achievable through the provision of better schools, more community centres, maintenance of open space and a change in attitude by the planning department to enable more places of public worship to be built.

A principal challenge was identified as finding "out-of-house" activities (sport, hobbies, music, etc) that are preferred to "in-home" electronic activities to experience and develop inter-personal relationship skills.

Opportunities to promote healthier lifestyles and improve health generally

The following opportunities were highlighted:

- More carefully designed cycle routes linking population centres to transport nodes
- Car parking should be reduced
- Cycle parking facilities should be increased to promote cycling
- Open spaces should be maintained to encourage healthy lifestyles
- Safe walking areas should be provided
- Green Infrastructure and open spaces provide opportunities for health and leisure
- PPG2, PPS 1 and 9 can help provide support to maintain, enhance and increase natural environments and habitats
- Linking health to Green Infrastructure can help meet and combine the above two areas
- Schools should be discouraged from disposals of recreational facilities and encouraged to develop and expand existing facilities and out-of-hours activities
- Other users should also be accommodated within existing schools accommodation
- MOL to western edge of Park Langley (Harvington Estate) should be defended from further development as it provides an opportunity for residents of all ages to enjoy a healthier lifestyle whilst appreciating the environmental quality of the area.

It is considered that physical health and wellbeing is very important in addition to mental and moral wellbeing. People with disabilities and carers are keen to be involved in design and development of facilities they want to use. Involvement at an early stage can save money and increase opportunities for disabled people.

It was noted that the following issues should be taken into consideration;

- The role of the voluntary sector in general and faith communities in particular in supporting the quality of life in the Borough and area
- Tackling social exclusion and inequalities including crime and fear of crime
- Need for a clear marker in LDF preparation of need to promote sustainable communities and encourage diversity and equality in planning
- Need to ensure provision for the voluntary sector including faith communities
- Need for space to operate, and to ensure the recognition of places of worship as part of the infrastructure for sustainable communities.

This issues document needs the words "places of worship" inserted in paragraph 2.0.4 following the word healthcare. Prosperity of communities requires proper provision for a spiritual element in care of whole health, illustrated in the RTPI Good Practice Note 5-part C-2008. The Fairworth Trust expects growth over the Plan period due to an increase in numbers of families attending and is currently seeking sites for new and replacement Gospel Halls and private school in the Borough.

Reducing crime and anti social behaviour and fear of crime through development?

It was suggested that care in the detail underpinning every development is required to reduce crime and anti-social behaviour. Poorly designed environments create frustration and result in a gradual deterioration. They tend to be badly maintained, littered and generally uncared for, which just leads to the downward spiral towards crime and anti-social acts of vandalism. Well lit, well maintained, cared for environments encourage local effort to assist each other and the neighbourhood benefits.

It was highlighted that people with learning disabilities are twice as likely to be bullied as non disabled counterparts. Waiting for and travelling on public transport identified locally as main area of concern. Integrating these issues into both design and the operational delivery of services, transport, policing and retail, will go some way to mitigate their concerns.

The following suggestions were made:

- Town centre development that encourages older people to come into the town in the evening
- Less inducement to cheap drinking and clubs
- Need for activities for young people, sport and training for jobs
- With careful thought during the design process it is possible to influence how safe residents feel in their homes, policies should encourage visibility from living room windows
- Provide better community services
- Promote the moral wellbeing of the Borough
- Ensure architectural design provides for open vistas and incorporates security features while maintaining architectural integrity.

The Metropolitan Police recommend that reference is made within the Core Strategy to 'Secured by Design' principles in line with the Metropolitan Police's 'Secured by Design' accreditation. The inclusion of 'Secured by Design ' would ensure consistency with the requirements set out by both national and regional policy. The following sentence is recommended for inclusion within the 'Supporting Communities' chapter of the emerging CS "The Borough will expect development proposals to reflect the principles of Secured by Design".

Affinity Sutton state that in addressing Issue 10 a combination of considered development and proactive neighbourhood management should be used. Reference is made to a two day neighbourhood appraisal of Mountfield estate to understand from as many residents as possible how they viewed their neighbourhood. Results taken from a 60 percent return showed that antisocial behaviour and lack of activities for young people were the key issues of concern for residents (35 and 21 per cent). The most frequently cited antisocial behaviour issues were fly tipping, graffiti and vandalism. Drug use was also a common concern. Additional services people would

like to see were activities for young people, sport and training for jobs. In response to these findings Affinity Sutton organised two clean up days at Mountfield and provided a weight and load service to get rid of some of the bulky waste. The clean up days are part of the partnership working with Bromley's Environmental Health and Anti-Social Behaviour Team. Affinity Sutton recognises the need to continue to address fly tipping on the estate and have organised a weight and load service a couple of times a year. The feedback has been very positive and the van is always full. To date 1.4 tonnes of bulk has been removed and fly tipping in the area has dramatically decreased.

It is considered that these services should be provided and funded in many other locations by the Council. There is a strong case for extending and improving the refuse collection service to improve the removal of bulky items and tackle fly-tipping. Provision of activities for young people is important to all residents whether wishing to avoid noisy games (often perceived as antisocial behaviour) or to relieve boredom so areas for play are incorporated into development plans by Affinity Sutton. Castledene Road (Anerley) includes a multiuse games area and in other areas of the country areas for informal play have been provided in keeping with the local environment.

The Gypsy and Traveller community.

It was noted that adequate space should be allocated for the gypsy and traveller community wishing to live in caravans. The London Plan has not given a clear target for new pitches but the Core Strategy needs to assess the needs of and make provision for gypsies & travellers. There should be provision for the gypsies & travellers currently in temporary sites and for the children of gypsies & travellers already living on sites. The Council should investigate whether it needs to provide for gypsies & travellers who have already been forced into houses who have a psychological aversion to bricks and mortar.

It was highlighted that the Gypsy and Traveller Accommodation Assessment of need within the Borough should be adhered to and the specific Borough target met and delivered in a reasonable timeframe. Bromley should commit to delivering 96 pitches 2007-2012 and a further 23 pitches for 2012-2017 – this includes catering for the needs of Travellers who are inappropriately housed. The Panel into the Draft Replacement London Plan stated the needs of those in bricks and mortar ought to be addressed and an additional allowance added to the 268 pan London minimum figure.

It was suggested that the high cost of land in London means a large majority of pitches will need to be treated as affordable and suitable means of delivery of pitches on the ground developed. Planning policy should lay out the number of pitches to be accommodated and a trajectory for delivery to 2017. It was acknowledged that there is a need for a criteria based policy which will help guide allocations and meet unexpected demand, indicating how site allocations will be met in a reasonable and timely fashion.

A point was raised that good communication between Friends, Families and Travellers, Traveller Law Reform Project and the Borough is necessary in accordance with Circular 1/2006.

Supporting Communities – Facilities and Services

Number of comments = 45

Demographic Challenges and the Changing Nature of Services

The London Plan reference that 'a growing and increasingly diverse population will create demand for more social infrastructure' was highlighted. Comments made particular reference to

- Policing and criminal justice.
- Requirement for more space for all aspects of life to be reflected in policy and site allocations
- The importance of intergenerational contact was highlighted - schemes for young people and older people to meet suggested eg helping at care homes, local history projects etc
- Providing greater choice and options for housing which helps to address some of the identified wider health, safety, and general wellbeing objectives
 - pro-active policy support for retirement housing, close to the key centres within the Borough unburdened by unnecessary infrastructure contributions.
 - Ensuring accessible social housing of various sizes. Some with facilities for live in carers
- Design features should incorporate the needs of people with multiple disabilities as more children and young people with complex needs come through the transition from schools into adult services in the community.
- A widespread network of facilities in parks across the Borough to suit all ages.

Extended or multiple use of educational facilities. Bromley College note that the role of colleges in the future may be enhanced, students may be attracted away from universities to colleges offering courses at a lower price. The Green Belt designation could be an impediment to the College expanding to meet these changing needs.

South London Healthcare Trust's estates rationalisation to improve the efficiency of the provision of healthcare across the Trust's various locations. In particular it was noted that the number of patients being cared for at Orpington Hospital are not commensurate with the NHS resources being consumed.

Geographical Spread of Facilities

It was highlighted that community facilities (and accommodation) for children and the elderly in particular must be met within the immediate community in which they are living. In some parts of the Borough, to the south, comments suggest that these needs may therefore need to be accommodated within the Green Belt. The availability of appropriate transport flagged as a key issue in accessing existing facilities.

The Healthy Urban Development Unit highlight the significant reconfiguration of health services in respect of

- Acute services affecting the PRUH ("A Picture of Health")
- Development of urgent care services
- Primary care provision – GP "hubs" in Orpington, Beckenham and Bromley
- New models of integrated care services
- Estate rationalisation – South London Healthcare Trust flag their proposals to improve the efficiency of the provision of healthcare across various locations.

Following the withdrawal of their services from Orpington Hospital some services will be relocating in Orpington, and on other Trust Hospitals.

Comments received by or on behalf of residents raise the following points

- Ensuring that the PRU hospital has sufficient transport links from all parts of the Borough and on street parking is not problematic
- Ensure that elderly people in particular can reach health services easily given the aging population and rationalisation of services onto fewer sites.
- Concerns about access to A&E with the on-going rationalisation of hospital services across the region
- The importance of retaining specialist facilities e.g. the hydrotherapy pool on the Bassetts site, and suggest that the Borough should seek to retain it or ensure a suitable alternative is in place as part of the redevelopment.

Comments highlighted that Youth Provision across the Borough is challenged with few facilities, especially to the East of the Borough. Much leisure and social activity is clustered in Bromley Town Centre. Pelling for Cray Wanderers FC highlight potential benefits to the Cray Valley of a proposal for a Sports Village.

Places of Worship were referred to in numerous comments, and the role of the voluntary sector in general and faith communities in particular in supporting the quality-of-life in the Borough was highlighted. It is suggested that the authority should focus on the need to tackle social exclusion and inequalities, promote truly sustainable communities and to encourage diversity and equality. Specifically it is suggested:

- There should be a specific recognition of places of worship as part of the infrastructure for sustainable communities, using the London Plan terminology in respect of social infrastructure.
- There needs to be identifiable buildings which are clearly sacred places
- There should be adequate provision for churches and places of worship right across the Borough. As the Borough has developed churches and community centres have been left behind, Orpington specifically highlighted
- Problems associated with finding a vacant church, or getting planning permission to convert, or build a new church building, large or small is next to impossible in Bromley.
- Consider supplementary planning guidance as produced by Croydon and Thurrock.

There should be protection to ensure continued theatre use and performing arts facilities, especially in other venues particularly where buildings don't benefit from protection through listing or conservation area designations

Retained and Improved Facilities

There is support for a Borough policy to promote and protect existing established community facilities, particularly in the face of higher demand for an alternative use. London Plan 2011 Policies 3.1 "Ensuring equal life chances for all" and 3.16 "Protection and enhancement of social infrastructure" highlighted as important. The loss of an existing facility should be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.

The following comments were made in respect of enabling / supporting facilities

- Land should be allocated specifically for elements of community infrastructure to avoid the continued squeezing out of community needs by more commercially attractive housing and employment uses.
- The Council should allow enabling development to release some value from land eg development in Thornet Wood Road could support the maintenance of a protected tree belt.
- New facilities, when required, should refurbish and re-use existing buildings if possible (as this usually requires less energy than new build) Dual use School land could be utilised for park land or even agricultural land leased to farmers. Eg Richmal Crompton Park
- The key to improving community facilities is investment both in terms of finding out what is needed where, and funding the changes required. The Turpington Lane Community Centre, refurbishment highlighted as good practice (Affinity Sutton)

Opportunities to Enhance Recreation and Leisure

New development should enhance recreation and leisure facilities through Community Infrastructure Levy (CIL) planning gains (Section 106 agreements) or other grants to supplement shortfalls.

Existing parks and open spaces could offer additional health benefits through

- the provision of outdoor gyms encouraging those unable to afford or feel comfortable in a conventional gym to be able to exercise. Suggested that funding could come through new developments (s106)
- Enhance access
 - for walkers and cyclists working with landowners to open up public access to the Green Belt for the urban population
 - across parks and green space sites implementation of DDA audit

Upgrade existing or increase provision of sports facilities & pavilions, cafes with toilet facilities in parks & open spaces eg

- Provide facilities to enable programming of events in parks (investigate charging options for new uses within parks eg fitness classes)
- provision of stages, lighting and sound facilities, open air cinemas and IT enablement.
- Toilet provision in open spaces (in partnership with commercial organisations)

Other comments suggest

- Redundant pubs can be transformed as alternative community venues to provide a range of performance spaces, for new plays and dance, and live music and comedy, to make a vibrant contribution to the evening economy and to help ensure their survival.
- Development of multi-use sites incorporating health/community facilities
- Identification of new allotment sites through new partnerships with private or third sector organisations
- Creation of honey-pot sites which can be utilised as tourist destinations through promotion of heritage and natural landscapes
- Acquisition of land, particularly in areas of deprivation
 - to open new areas to the public
 - Investigate the option of working with private landowner to designate area as an off-road motorcycling facility

Pellings LLP highlight Cray Wanderers FC Sports Village proposal for a new stadium with integrated leisure, community and commercial facilities on land off Sandy Lane, which would:

- Encourage participation in health and leisure pursuits in the area which is noted as suffering from poorer health than the Borough and London average.
- Support life opportunities for children and families and divert young people from anti-social behaviour, addressing the need for facilities for young people and children identified in the issues document with a range of events and training facilities.
- Provide a range of accommodation for use by the local community to increase opportunities for recreation and leisure.
- Include recreational and leisure facilities for individuals and local clubs/teams

Numerous comments suggest that the glossary should include community facilities for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. It should also include policing and refer to museums, art galleries, theatres and places of worship or a separate description could be included for the term "Cultural and Social Facilities". This could include the pursuit of leisure, recreation, sport, arts, music activities and a range of uses that add greater diversity to the cultural scene, such as concert and theatre venues; artists' studios; street events; public art; community music and dance venues; galleries, and facilities for film and digital media.

Getting Around – Transport and Accessibility

Number of comments = 28

Comments suggested that the Core Strategy should direct new development in the first instance towards sustainably located sites that fall within an existing defined centre. When new developments are located close to the main transport links, it will help to reduce car reliance and therefore road congestion and parking problems. It was argued that Bromley should therefore support higher density schemes which are located within walking distance to train stations with direct links to London. The setting up of park and ride schemes was suggested to encourage more use of High Streets which are often short of parking.

The Highways Agency was concerned about any potential impact of developments on the operation of the M25, in particular junctions 3 to 5. These junctions experience high levels of congestion particularly during peak periods. There would be concern if any material increase in traffic were to occur on these sections of the Strategic Road Network as result of development in the Borough without careful consideration of mitigation measures. It was noted that it is important that the Core Strategy provides a robust planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Adequate car parking arrangements were seen as important in giving people flexibility and choice in their lives. However, it was acknowledged cars place further strain on local traffic congestion. It was suggested that car clubs in combination with good public transport options should help the higher density town centre flatted developments that will undoubtedly come on stream.

Comments were received about policies to encourage companies such as Streetcar to set up in Bromley. In the residential areas around Bromley North, Sundridge Park, Bromley South and Bickley, the majority of individuals use trains to get to work, but want a car for the weekends. With the high cost of car ownership and difficulties with parking, many would find this a better alternative than owning a car which isn't used on a daily basis.

The GLA noted the maximum car parking standards for new residential developments have recently been abolished. However, they noted that TfL would still expect all new developments to be in compliance with the maximum parking standards as set out in the recently adopted London Plan.

The Met Police recommended that the parking requirement for specialised land uses be assessed on an individual basis, having regard to meeting operational need (as supported by the London Plan, 2011) which seeks to ensure that the provision for parking at ambulance, fire and policing facilities will be assessed on their own merit. It was recommended the 'Getting Around' chapter of the emerging Core Strategy should therefore include the following wording:

'Car parking provision for emergency services including policing facilities will be determined by operational need and on a case by case basis, recognising that flexibility from the prescribed standards is required.'

English Heritage highlighted their support for sustainable transport and measures to reduce the need to travel by car, due to the benefits this can have for the historic environment. Support was given for investment into the public realm to encourage and facilitate access and enjoyment of the historic environment.

It was noted that improving accessibility to key economic areas of the Borough is essential to meet changing demands. Comments argued that opportunities should be taken through redevelopment and regeneration to ensure sustainable accessibility to key employment and retailing areas, enhanced design and sustainable design and construction.

It was noted that Bromley South does not have any disabled or pushchair access. Also neither does the Bromley North/Sundridge park line, (although Bromley North has disabled access, Sundridge Park does not) there is no ramp or lift access at Grove Park to the other platforms to enable you to get trains to London/Orpington.

Comments were received about the need for a direct line train service to London from Bromley North station. The current change at Grove Park adds 10-20mins to the commute each way. It was suggested that people end up driving to Elmstead Woods or simply choose to live in Beckenham or Orpington in order to have a quicker commute.

The issue of the provision of a network of accessible toilets and in particular "Changing Places" facilities in town centres was raised. It was felt such facilities would encourage people with disabilities to come to the Borough. It was also raised that attention be drawn to the employees and shoppers with disabilities who are less mobile, thus relying on accessible key transport hubs to get around the Borough.

There was concern that the transport infrastructure cannot cope with additional infill housing which in turn puts public transport under considerable pressure and increases car use. Issues were raised that public transport in the Borough is relatively poor in comparison to other London Boroughs since we do not have the tube, DLR or frequency of trains of other areas. Also raised was the issue of the geographical closeness of places such as Canary Wharf, Greenwich and the Olympics site; however this contrasts with the difficulty in reaching these places via public transport.

Several comments highlighted a required expansion of the tube network, a DLR extension, tram extension to Bromley South and further to facilitate east-west commuting and to Biggin Hill.

Comments suggested the need for further pedestrianisation in the retail areas of the Borough, combined with improved bus (and tram) services and better provision for cyclists. There were concerns that public transport needs to be seen as a cheaper and more comfortable option than the private car. Encouraging cycling in the Borough was also raised.

Comments suggested the introduction of local congestion charging to encourage and subsidise the take-up of public transport. 'Inappropriate' car use could be reduced by progressive road pricing and increasing restrictive parking to stop short journey commuter parkers. Also proposed was double yellow lining a mile around each school to encourage walking to school and to reduce the twice daily school traffic congestion.

It was suggested that 'express' bus services during peak times to major areas of employment and transport hubs could be introduced. For example the 119 is the main form of public transport from Bromley to Croydon - it takes 1 hr in the morning. However half the route from Shirley onwards is served by many other bus routes, therefore why not make it fast from Shirley to East Croydon to link up with the tram,

and train stations. A similar approach could be used for services from Biggin Hill to Bromley, between Bromley and Beckenham Junction, Bromley Common to Orpington etc. It doesn't have to be all buses on that route during the rush hours - but every other bus.

Ensuring the very long bus routes to big areas of employment/transport hubs have express services during peak periods would make a noticeable improvement for commuters, shoppers and other road users. It was noted that the very local bus routes e.g. R buses in Orpington, and hoppers in other parts of the Borough such as the 162, 226, and 367 that go on the minor roads and smaller towns and villages are vital for connectivity.

It was raised that there are enhancements needed to the bus terminus at Crystal Palace Parade, together with the suburban and overground station at Crystal Palace, including public conveniences and step-free access to the station. It was also raised that the potential for a tram service to link the Crystal Palace bus terminus and train station should be identified as a longer-term objective.

Concerns were raised that Biggin Hill is primarily a residential area surrounded by open country and that any attempt to develop industry and business to the extent that the present character of the village is altered (increased traffic etc) should be resisted at all cost.

Our Valued Environments – Natural and Man-made

No of comments = 44

Man-Made Environments

The existing policies for the built environment and the individual characteristics of the areas of special residential character need to be maintained or carried forward from the UDP.

Development Management should

- Make every effort to develop Brown field sites and to recover the vast numbers of empty properties that are in existence.
- Develop a character / urban design study of the Borough to ensure that proposals reflect the character of those areas we seek to protect and identify areas where tall buildings would / would not be appropriate. (Need to consider what is considered 'tall' in the Bromley Context).
- Produce Supplementary Planning Documents (including conservation area appraisals). The Hayes Triangle is specifically highlighted as are viewpoints (Watts Lane noted).
- Include a Borough-wide heritage strategy and policies to ensure that heritage assets and their settings are conserved and enhanced (in line with PPS5) and a robust, publicly accessible evidence base
- Incorporating Green Infrastructure into development opportunities can provide support to this area, promoting a holistic approach together with energy usage and sustainable construction.
- Incorporate minimum space standards that generally conform with those set out in the London Plan
- Avoid prescriptive private amenity space standards (other than in conformity with the Mayor's Standards), developments to provide specific value instead of generic "open spaces" contributions in their s106 SPD. Eg enhancing private woodland amenity space (tower blocks on the Mountfield estate),
- The GLA reiterate the requirement for all new housing to meet 'Lifetime homes' standards with 10% designed to be wheelchair accessible.
- Ensure that any infringements to planning laws/planning applications are dealt with promptly and fairly.

Public Realm – it is important to ensure that our town centres/local shopping parades are inviting, well maintained and are considered safe. Importantly:

- Good public transport and car parking facilities,
- High Streets not too long for walking / policy solutions for "poorer ends".
- Deliver cycle friendly routes.

Chelsfield Park seek resolution to their long standing request for an Area of Special Residential Character.

Natural Environment

Green Infrastructure - Natural England and others note the contribution that the natural landscape and Green Infrastructure make to the quality-of-life and health of Borough residents by providing mental respite and breathing space within largely urban areas. Comments highlight:

- the contribution of the natural signature (underlying landscape) of the Borough to local distinctiveness and the guidance within the “London Landscape Framework”.
- that 6 regionally important geological and geomorphologic sites are located in the Borough requiring management and the promotion of public access
- plans should treat the open space network as part of an integrated system to which improvements are encouraged. Work with the third and private sectors on the Rights of Way Implementation Plan is highlighted.
- Pressures on resources across Borough boundaries supporting joint work.
- Schools can be developed to provide sporting resources without a major impact on the green spaces (Charles Darwin School sited as an example)

Water – The Environment Agency note that a clear link needs to be made to other plans and strategies e.g. River Basin Management Plans and, particularly given Bromley’s high reliance on its groundwater resources, the Water Framework Directive, as they may impact on future development and vice versa. This includes impacts beyond their Local Authority boundary. The broad objectives of these plans should be incorporated in the Core Strategy to meet Local Authorities general responsibility not to compromise compliance with EC Directives.

Green Belt - comments suggest that the use of Green Belt land should remain protected at all cost to prevent deterioration and change in character. Other comments suggest that in order to protect the areas of natural heritage a formal review of Green Belt boundaries be carried out. Land which does not meet the PPG2 criteria for inclusion should be developed for alternative uses of all types, ensuring that the pressure for development is reduced on other Green Belt land.

Comments suggested

- release for housing
- a presumption in favour of the reuse of Green Belt land for sustainable development which serves the community / enabling development

Housing - the basis of the proposed quantum of growth is questioned and it is suggested that too much weight is attached to the “protection of the environment” rather than the delivery of much needed housing. The need to assess all potential scenarios is highlighted. This current approach has not provided certainty of sufficient delivery. As such, the plan should seek to explore “reasonable alternatives” to ensure suitable “flexibility”, including a contingency for an alternative approach to delivery that assesses housing in the Metropolitan Open Land or Green Belt to meet the need. Specific reference made to the release of Keston Garden Centre from Green Belt to meet housing need.

Other uses (either release or retained within the Green Belt but justified by “very special circumstances”)

- Pellings LLP, for Cray Wanderers FC suggest that proposals for a “Sports Village” including new stadium, leisure, community and commercial facilities in St Paul’s Cray, represents a unique opportunity for the Club to assist with the regeneration of a deprived part of the Borough, with environmental enhancements to minimise the impact on the Green Belt, character and ecological interests of the open space.
- Gypsy & Travellers - Comments highlight the need for additional pitches to protect the environment through the prevention / resistance of unauthorised incursions. Delivered through:
 - the expansion of existing sites
 - allowing existing temporary pitches to become permanent

- allocation of new sites (on Green Belt if no other land is available)
- ensure that any sites already benefitting from permission for caravans are protected for future use by caravans.

Comments also suggested a relaxed view of "very special circumstances" be taken for enabling developments which benefit the community, specifically, the diversification of farm land / market gardeners should be viewed sympathetically having the potential to improve the economic well being of the rural community and minimise hauls to supermarkets. (Watts Farm highlighted)

Working in Bromley – The Local Economy and Town Centres

Number of comments = 32

It was acknowledged that there is a strong need for a carefully structured mix of different sized offices, workshops, studios and industrial units that vary from one person upwards to accommodate the various business sizes and scope for growth. Also noted was the importance of business space for start-up businesses with low-cost, easy-in, easy-out, managed solutions for those out-growing their home based business. Accompanying this is the issue of the provision of a very high speed and managed internet access infrastructure.

It was noted that the Core Strategy must be flexible and responsive to cater for the support and encouragement of sustainable economic growth. Comments pointed to the requirements for an assessment of the existing employment land and premises in the Borough, many of which could be considered unfit for purpose. The issue of flexibility was raised in respect of the terms of land use classes. It was suggested that mixed-use schemes could help ensure varied economic activity and assist in delivering regeneration.

Comments were received that suggested the Council designate an area as a 'Bromley Business Park' and support the provision of infrastructure to facilitate development and secure employment land for the future. Connected to this was the issue that the Council should identify future levels of retail and other commercial floorspace for different areas.

Comments received noted that the Core Strategy should support the widest range of employment uses. The Council should ensure that the development plan identifies a range of sites to facilitate a broad range of economic development. It was pointed out that policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances. Change of use class should be supported within planning policies. It is considered that a definition of uses appropriate on employment land should be included within the Core Strategy, to recognise that sui generis uses may be an appropriate use for employment land.

It was advocated that the Business Areas have changed in the past 10 years and, not only are the UDP permissive uses likely to now be incompatible with neighbouring commercial and residential land uses, but the shift to the office based economy will mean some sites provide limited value to the business community to develop it for its allocated uses.

It was highlighted that the Council needs to designate new and safeguard existing employment land, whilst balancing the supply of land with prospective demand based on robust evidence that also has full regard for markets needs. Designated Business areas will need to be capable of the requirements of high traffic volumes and public transport infrastructures.

The Metropolitan Police were concerned about the provision of patrol bases, custody centres and relevant pan-London policing facilities that are an essential part of effective borough-based policing. The nature of these uses are similar to that carried out on most employment sites and are therefore suited to employment sites and similar locations. Whilst falling outside the 'B' Use Class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they

possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

The Met police also highlighted the need for front counter facilities and contact points where the public can interact easily with police officers. Local centres and other shopping frontages provide ideal locations for these facilities due to the high levels of public accessibility and footfall. Such policing facilities add to the vitality of local centres by ensuring that an active frontage is maintained as well as providing an increased perception of safety and security across the Borough. Planning Policy should enable suitable community uses, such as front counter policing facilities to be developed within town centres and shopping frontages. The Met police recommend that the following sentence is included:

Where employment densities are similar to existing, designated employment sites may also accommodate alternative employment generating uses - including facilities for emergency services.

The point was made that the Council needs to recognise that the scale and quality of the resident workforce is one of the Borough's greatest assets; and that it is essential to the Borough's future economic prosperity that the resident workforce grows in line with the forecast pace of employment change. Housing development should be acknowledged as a key contributor to maintaining an adequate and flexible resident workforce. The fact that the large share of forecast employment growth is in sectors of the economy that are office-based is advantageous to the sustainable development of the Borough.

There was recognition of the significant employment and business opportunities at Biggin Hill. Comments were received on the London Plan designation of Biggin Hill as a Strategic Outer London Development Centre (SOLDC) and that the area is comprised of a cluster of high technology and avionic businesses. Comments highlighted Biggin Hill's economic potential to provide a real drive and boost to the economy of the Borough. The GLA noted the Mayor of London's keenness to encourage economic growth in Outer London, with direct reference to Biggin Hill's designation as a SOLDC to encourage investment in this area.

It was noted that the LoCATE@Biggin Hill initiative provides an opportunity for the potential investment and improvements to Biggin Hill to be realised. Biggin Hill could act as a focal point for further economic growth, but for this to happen it was noted that it was imperative that the SOLDC and LoCATE initiatives be cemented into a positive local planning policy framework, in line with the Governments Plan for Growth agenda.

The mutual benefits of the associated business clusters at Biggin Hill were raised as a key issue, with links to supporting initiatives, such as training, that can help to attract and retain skilled labour. Comments were received about bringing vacant land and buildings back into operational use.

It was suggested that the Council facilitate the creation a business park, however, it was noted that the road network around Biggin Hill severely limits the potential scale of any development. Development of the road/train/tram infrastructure, together with further carefully planned residential housing needs to be coordinated with the 'Strategic Outer London Development Centre' aspirations.

The issue of noise and disturbance coming from the airport was raised, but the context of the Heathrow flight path over parts of the Borough was acknowledged. It was suggested that a carefully planned easing of the Biggin Hill flight restrictions may make little practical difference to actual noise levels, whilst helping to make the area a centre of avionics excellence.

Observations were made that in order to be successful it is necessary to allow for the other associated facilities to establish and develop in the area. This will include housing, retail, leisure, social facilities, open space, transport and so on. It is important that the area is considered as a whole and not focused solely on the employment element. There was a call for an action area approach to incorporate the wider area around Biggin Hill to maximise the potential for growth in a fully coordinated way. Also raised was the need for a planning framework for Biggin Hill which will enable positive planning to encourage investment and growth.

In terms of Bromley town centre, comments were received about securing an anchor department store, improving night time security and developing a restaurant quarter. This could be supported through the use of park and ride schemes. High quality retail developments alongside the provision of new housing in the town centre were suggested as a means not losing market share to neighbour Croydon. There were comments that Bromley town centre should limit the number of less desirable establishments such as betting and sex shops through the use of planning policies.

Concerns were raised that the Core Strategy will need to set out how the Council will work with landowners to deliver development on the sites identified within the AAP, making provision for the delivery of alternative uses in instances where it can be demonstrated that a preferred use is no longer viable, or marketable to potential occupiers. This approach will ensure an appropriate degree of flexibility that will assist in enabling the overall AAP vision to be achieved during the lifetime of the plan period.

Bromley town centre's importance as a location for high value-added office-based sectors of the economy was raised as being essential to the future prosperity of the Borough. Support for the individual small retailers by adopting strong policy to protect and encourage them was also mentioned.

The importance of public transport, car parking, the breadth of retail offer available, were highlighted in order to support the local shops. In the current climate, it was suggested that the Borough take a lead in capping business rent and rates.

The point was raised that banks are significant generators of footfall and that the Council should recognise the positive impact that financial service retailers such as the banks have upon vitality and viability. Limiting certain uses in the primary shopping frontages undermines the Council's intention to attract private sector investment in the town centre.

The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. In the view of the Bank, the Core Strategy must consider the issue of the Council's outmoded approach to A2 uses in town centres. Critical of the lack of a review of the Council's out-of-date policies for primary shopping frontages and the lack of any evidence to continue with them. It was suggested UDP policies such as S1, S2 and S3 are reviewed as they are neither consistent with National Policy nor justified.

It was suggested the Priory in Orpington should be brought into use including the old library for a cultural centre adjacent to the park. Developers should be encouraged to develop schemes in Vincent Close, Homefield Rise and Lancing Road together with redevelopments on the south side of the War Memorial roundabout.

Environmental Considerations

No of comments = 33

Sustainable Design and Construction

Comments on the concept of local standards for sustainable design and construction and renewable energy were mixed, with suggestions that there should be none, some or just those that already exist in the London Plan. Some considered higher standards are needed, whilst others felt that standards are not viable in all cases and that there should be flexibility to ensure that overly stringent regulations do not constrain developments coming forward. Another considered the standards unhelpful, producing very little return and playing on fears.

The GLA comments that the Core Strategy should take advantage of the policies in the London Plan to note any locally specific potential to minimise CO2 reductions and for local energy generation to minimise CO2 emissions across the Borough. Responses to local standards were mixed but generally there was a resistance to local standards.

With regard to sustainable design standards comments were received regarding

- viability linked to the new 'affordable rent' tenure, raised by Registered Providers, who also flagged the HCA requirement for statements on design.
- that it would be more sustainable for fewer flats and more houses to be built (disability group)
- the need for green landscaping, specifically green links between parks and linking with town centres as well as tree lined streets as well as green transport routes and play / community areas.

Renewable Energy Technology

A number of representations raise concerns about the potential visual impact of renewable energy technology (solar panels and wind turbines), with regard to areas with notable character and on historic buildings.

- English Heritage suggests policies consider the potential problems with retrofitting energy equipment on historic buildings.
- A couple more representations relate to areas of special residential character and conservation areas where it was suggested that other forms of air/ground source heat pumps should be mandated.

Other comments in respect or renewable energy technology refer to

- The potential for park lighting to be solar powered
- the required inclusion of electric vehicle charging points at new developments in accordance with the standards set out in the London Plan (GLA)

Waste management

Waste management was raised as an area where the Borough needs to show a firm commitment, with the GLA commenting that the current evidence base (a technical paper) is not in conformity with the London Plan. Southwark highlight that one of their sites in the paper is not currently in operation. To achieve conformity the GLA advises that the Core Strategy should

- include a commitment to safeguard all existing waste sites.
- state that if any waste site is lost, additional compensatory land with equal or greater throughput will be provided.

- confirm the allocated waste apportionment over the lifetime of the strategy and how it will be met during this timespan.
- reference the Mayor's recycling and composting targets for both Municipal and Construction, Demolition and Excavation (CD&E) waste.

Additionally the GLA suggests that Bromley may wish to require all new developments have sufficient waste and recycling storage facilities, support the development of management facilities that have positive carbon outcome and ensure that developments adjacent to waste sites will be designed to minimise conflicts of use.

Surrey County Council point out that Bromley have been exporting waste to their area and that they are keen to see Bromley

- increase its self-sufficiency in dealing with waste.
- will need to devise estimates for all major waste streams including municipal waste (MSW), commercial and industrial (C&I) waste and construction and demolition (C&D) waste.
- allocate sites for the management of that waste, either unilaterally or in partnership with other South East London Boroughs. Also supported by the Environment Agency who highlight the importance of "Resource Management" suggesting that the identification of employment land adjacent to, or close to, existing and proposed waste management facilities could form the basis of a resource recovery park.
- help reducing London's reliance on mineral imports (aggregates from Surrey) by promoting sustainable construction and requiring a proportion of recycled aggregate to be used in new development. (Also supported by the Environment Agency)

The Environment Agency also suggests that the borough:

- includes advice on designing out waste in any guidance on the design and layout of all forms of development
- promote a better understanding of waste management options that protect the environment and human health,
- improve resource efficiency and help reduce greenhouse gas emissions
- develop a "whole life" approach to tackling "high impact" waste streams

A comment was also received suggesting incentivising the use of recycling facilities for residents (eg with vouchers for local shops)

Groundwater protection, flood risk management and water conservation

The Environment Agency highlight groundwater protection, flood risk management and water conservation as key areas for policy development requiring prioritised environmental outcomes jointly agreed and delivered with local authorities and partnerships. They note Bromley's role as the Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 and in respect of integrating this into the development process advise as follows:

- All planning applications and pre-development enquiries should be assessed in terms of local flood risk and this issue should be incorporated into the planning application form.
- Development should incorporate "green infrastructure" that provides for multi-functional uses in new and existing developments
- Recognising the role of wetlands, forestry and ponds in regulating the water cycle and flood management,

- Explore any efforts to enhance biodiversity through water management in accordance with PPS9.
- Address the responsibility for consenting on ordinary watercourses on planning application forms and through the pre-application process.

A local representation suggests that consultants should be appointed to support Bromley as the lead local flood authority, coordinating past catchment studies, accepting river corridors as flood zones and developing policy.

The EA comment that developments should be sustainable both now and in the future, adaptable to society's changing needs and demands they suggest that

- new development and regeneration sites should have plans in place to address their Environmental impacts.
- construction standards be applied which significantly exceed building regulations to embed sustainable design in new buildings (e.g. high insulation levels, passive cooling techniques, to comply with the highest level of the Code for Sustainable Homes
- Commitment is made to building "communities" and providing social and community infrastructure

Ground water protection

The Environment Agency comment that the plan should promote sustainable water management practices, e.g. recognise the role of wetlands, forestry and ponds in regulating the water cycle and flood management. The EA note that SUDS (in particular infiltration SUDS) are not suitable in all circumstances and should only be used where there is no risk of discharges to ground which would pose an unacceptable risk to controlled waters.

The GLA comment that the Borough may wish to

- identify waste water treatment capacity requirements to meet any proposed growth
- identify locally specific/suitable measures to improve the water environment on the basis the Thames River Basin Management Plan (Annex C) with assistance from the local EA office

Flood risk management

The Environment Agency highlight that there are 9,000 properties at risk of flooding in Bromley and any new development should not cause this number to rise. It was felt that the potential problems of flooding had been "played down" in the Issues document. They comment that PPS25's Key Planning Objectives should be reflected in policies and that

- the sequential test, should be correctly applied steering new development to the lowest risk flood zone appropriate to the proposed use, and
- A flood risk assessment should demonstrate that the development and its occupants/users will be safe for the lifetime of the development, that the development does not increase flood risk elsewhere and seeks to reduce risk overall
- Given that some existing development may not be sustainable in the long-term, use regeneration to help relocate existing development to lower risk locations

They comment that no inappropriate developments should be located in areas at risk of flooding and more households and businesses should be better protected from flooding from all sources, particularly in disadvantaged communities.

The GLA point to the policy steer in the Environment Agency “Thames Catchment Flood Management Plan” specifically

- Applying the drainage hierarchy in the London Plan locally, and
- considering the relevant Drain London outputs

Reducing water consumption

Comments note the limited contribution of development control process to reducing water consumption in limited and the GLA suggest a policy approach would be appropriate. The Environment Agency note that all abstractors and users of water must be encouraged to ensure they reduce their water consumption to manage demand and share water in the most efficient way. They comment that development should not be provided

- where it would lead to a deterioration of in the quality, quantity, or natural flow of underground, surface and waters
- where adequate water resources do not already exist, or where their provision is likely to cause risk to existing abstractions, water quality, fisheries, nature conservation, amenity, or inland navigation interests or any facet of the water environment

Other representations suggest

- Rainwater harvesting and grey water harvesting be required in all new developments where practicable

Beyond the Borough Boundary

Number of comments = 8

A key issue raised was that many disabled people in the Borough have to use swimming baths in Greenwich as they have platform lifts suitable for wheelchair users with multiple disabilities. Additionally, people with learning disabilities use arts and adult education facilities in Bexley, primarily because they are accessible. Addressing access issues is important to people with disabilities, rather than just “reasonable adjustment”.

Disability Voice Bromley also noted that if there is sufficient suitable housing, people with disabilities will be able to access services and shops more easily and become increasingly active members of the community.

A South East London wide approach was welcomed, if it avoided duplication, but infrastructure issues like transport, including Dial-a-ride need to be factored in. Many charitable organisations already work across borough boundaries.

There is an opportunity to ensure that the historic environment is used positively and pro-actively in areas of regeneration to be a catalyst for successful regeneration and high quality design. We welcome area-specific policies which support this.

It was suggested that a London wide plan for a network of traveller sites would alleviate the short stay groups and the resulting tensions that frequently arrive. There were concerns that Bromley Council could try and be more positive when dealing with the long term plans for Gypsy Travellers.

Crystal Palace

The Crystal Palace Triangle Planning Group made extensive comments. The Group commented that the Council should work closely with adjoining boroughs to make sure that all sides of the Crystal Palace Triangle are vibrant. Crystal Palace town centre has benefited in the past from council initiatives, including the provision of a Town Centre Manager funded through Croydon Enterprise and dedicated to this one centre. We look to the restoration of a dedicated Town Centre Manager for Crystal Palace funded by the three adjoining boroughs.

The Triangle is heavily congested with traffic at peak times. The one-way system has improved traffic flow overall but traffic speeds through the Triangle, adding to pedestrian danger and contributing to the closure of shops and cafés dependent on passing trade that were already under economic pressure. The one-way system should be reviewed and further traffic calming measures and safe crossing points are needed.

The opportunities and challenges of coordinating plans and the provision of facilities and services shared across borough boundaries are self-evident. Schools and learning places, health facilities and places for the community to meet and use should be grouped together and within easily reachable places. Enhanced provision of community facilities for young people could be created through the co-location/sharing of any facilities provided to meet future demands for educational places. There may also be opportunities to provide healthcare facilities within close proximity.

The bulk of Upper Norwood is in LB Croydon, but five London boroughs have a stake in this broader area, affecting five Mayoral sub regions. The area is made distinctive not only by Crystal Palace Park, but by the Crystal Palace Triangle district centre. Bromley's stake in Crystal Palace is essentially the "Triangle" stretch of Church Road and the Park. Collaboration with other Local Authorities across the area is essential, if Upper Norwood is not to remain at the edge of everyone's peripheral vision. Crystal Palace will require a neighbourhood plan prepared in collaboration with Croydon and Lambeth Councils in association with Southwark and Lewisham, and endorsed by the GLA. The Triangle Planning Group will be happy to provide local input to this process.

Supplementary Planning Guidance should be prepared for the whole district centre in collaboration with Croydon and Lambeth, to advise developers and assist the control of development. Planning decisions in any part of the centre or in the Park have wider implications, and must not be taken in isolation by one borough Council acting alone.

The five boroughs and the GLA acting together should take a comprehensive view of the planning needs of the entire Upper Norwood area. The Crystal Palace Triangle Planning Group are willing to work with the Chief Planners of each borough to achieve a coordinated plan that draws on the local knowledge of the traders and residents and the technical expertise of the borough Councils.

Core Strategy - Context and Update

Summary

The Government is proposing major changes to the planning system which will impact both the form and content of the Council's Local Development Framework and, in particular, how the Council takes forward the preparatory work for the Core Strategy.

The draft National Planning Policy Framework and local planning regulations consultation do not refer to Local Development Frameworks and Core Strategies but to 'Local Plans'. The proposed changes, including the Localism Bill expected to receive Royal Assent within a few months place increased emphasis on local planning authorities having 'up to date' plans based on robust evidence.

On this basis it is recommended that the continuing work to develop Bromley's Core Strategy is used to prepare a broader 'Local Plan' which will meet the requirements of proposed reforms and set clearly at the heart of the plan making process the Council's aspirations and vision for the Borough. This would provide a robust and up to date local plan that positions the Borough's objectives and policies in the context of the national and regional policy and sets a strong framework for any proposals for neighbourhood plans.

All development plan documents need to be supported by robust evidence and found 'sound' at the Examination in Public (EiP). Much of this work has already been undertaken and updating and refinement is ongoing.

The Council is required to demonstrate as part of the Core Strategy or local plan that its vision and objectives are deliverable. This requires the preparation of an Infrastructure Delivery Plan setting out the infrastructure required (e.g. utilities, schools, health, community and leisure facilities and open space required. ((see note). In turn the Infrastructure Delivery Plan (IDP) and Schedule can be used to demonstrate the requirement for additional funding and support the Council in introducing a Community Infrastructure Levy.

National Context

The Government has consulted on major planning reforms that it intends to introduce by April 2012. The Council is in a good position to transfer the work undertaken to take forward its Core Strategy to the preparation of broader plan to meet the new requirements. Authorities with adopted Core Strategies will be required to revisit these in light of the changes.

London Context

The Council's development plans are required to be in 'general conformity' with the latest London Plan, adopted in July 2011. The GLA will be issuing early alterations for consultation in November 2011 that will seek to ensure that the London Plan is itself in general conformity with the national framework.

Issues for Consideration

- The requirement for any plans to be fit for purpose in the new planning environment, in particular meeting the requirements of the new policy framework and planning regulations.
- The impact of the proposed 'slimmer' national planning framework and potential desire to include policies that were previously relied on at a national level within any local plan
- Any changes in process and programme to move from preparing a Core Strategy to a broader 'Local Plan'
- Implications arising from the Localism Bill, for instance, the potential for neighbourhood plans.
- The scope for variation from, and flexibility with, the London Plan while remaining in general conformity as required by legislation.
- Issue/topic requiring further evidence/debate arising from the Core Strategy Issues Document consultation
 - Green Belt
 - Areas of Special Residential Character
 - Business Areas
 - Provision of Gypsy and Traveller Pitches
 - Crystal Palace
 - Biggin Hill
 - Housing Targets and Capacity
 - Neighbourhood Plans

Next Steps/Timescale

Nov 2011 - LDFAP Panel and DCC

Consider response to consultation on Core Strategy Issues Document and potential of moving to Local Plan to meet anticipated legislative requirements

Nov 2011 - Feb 2012

Review of Options for Key Issues and Identification of Preferred Options
Identify UDP Policies for continuation in new plan
Assessment of London Plan policies and general conformity issues
Identification of 'lost' national policies to consider for inclusion

March 2012

Draft Preferred Options for LDFAP and DC to consider March 2012

April 2012

New national planning policy and legislation in place

Spring 2012

Public Consultation on 'Preferred Options and Draft Outline Plan'

This page is left intentionally blank

Report No.
RES11136

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: Development Control Committee

Date: 17th November 2011

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **BIGGIN HILL HERITAGE CENTRE WORKING PARTY -
UPDATED TERMS OF REFERENCE**

Contact Officer: Christine Reeks, Democratic Services Officer
Tel: 020 8461 7638 E-mail: christine.reeks@bromley.gov.uk

Chief Officer: Mark Bowen, Director of Resources

Ward: Biggin Hill

1. Reason for report

This report requests the Committee to endorse updated Terms of Reference for the Biggin Hill Heritage Centre Working Party, as proposed by the Working Party.

2. **RECOMMENDATION(S)**

That the updated Terms of Reference for the Biggin Hill Heritage Centre Working Party be endorsed.

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Vibrant Thriving Town Centres.
-

Financial

1. Cost of proposal: No cost
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: £N/A
 5. Source of funding: N/A
-

Staff

1. Number of staff (current and additional): N/A
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: No statutory requirement or Government guidance.
 2. Call-in: Call-in is not applicable. This report does not involve an executive decision.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes.
2. Summary of Ward Councillors comments: Ward Councillors are represented on the Working Party.

3. COMMENTARY

- 3.1 The Biggin Hill Heritage Centre Working Party was established by this Committee in September 1999 (Minute 453) to ensure that the development of the former RAF site and Heritage Centre could be progressed as effectively as possible. The Working Party has no delegated powers but reports and makes recommendations to this Committee, the Executive or other Committees of the Council as appropriate.
- 3.2 The original Terms of Reference of the Working Party were agreed at their meeting on 25th November 1999 (Appendix 1). At the meeting of the Working Party held on 3rd November 2011 it was considered by Members that the Terms of Reference needed to be updated. The proposed new Terms of Reference are attached (Appendix 2) for endorsement by this committee.

Non-Applicable Sections:	Policy, Financial, Legal and Personnel implications
Background Documents: (Access via Contact Officer)	

This page is left intentionally blank

BIGGIN HILL HERITAGE CENTRE WORKING PARTY

TERMS OF REFERENCE

(Agreed by the Working Party on 25th November 1999)

1. To evaluate the feasibility of securing the provision of a fitting memorial, museum or other visitor experience, on the role of the former RAF Biggin Hill;
2. To determine the character and scale of such a project within the constraints of the available sites;
3. To assess the scope for incorporating a park and ride service linking other heritage attractions if felt to be appropriate;
4. To advise on the possible funding for any options identified; and
5. To report back to Development Control committee or other Committees of the Council as appropriate.

This page is left intentionally blank

BIGGIN HILL HERITAGE CENTRE WORKING PARTY

**TERMS OF REFERENCE
2011**

(Agreed by the Working Party on 3rd November 2011)

1. To advise the Council on how best to facilitate the provision of a heritage centre (ie, a fitting memorial, museum or other visitor experience, concerning the role of the former RAF Biggin Hill) and to advise on the character and scale of such a project within the constraints of the available sites.
2. To advise the Council on the release and drawing down of s106 funds kept aside for the purposes of facilitating the heritage centre and to recommend the acceptance or otherwise of business plans, project plans and other documentation as required.
3. To liaise with and monitor the progress made by the Biggin Hill Trust to secure sufficient resources for facilitating the heritage centre at Biggin Hill.
4. To report to the Executive and other Committees of the Council as appropriate.
5. Membership of the Working Party shall consist of up to four elected Members of the Council as appointed by the Development Control Committee at the start of the municipal year, one of whom shall be elected Chairman. Other persons can be invited to attend by the Chairman of the Working Party: currently it is suggested that this include the Chairman and Director of the Biggin Hill Trust and with the approval of the Chairman of the Working Party, to invite other appropriate representatives of the Trust.

This page is left intentionally blank

Agenda Item 11

Report No.
RES11137

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17 November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **MEMBER APPOINTMENT - PLANS SUB-COMMITTEE NO. 1**

Contact Officer: Lisa Thornley, Democratic Services Officer
Tel: 020 8461 7566 E-mail: lisa.thornley@bromley.gov.uk

Chief Officer: Mark Bowen, Director of Resources

Ward: Boroughwide

1. Reason for report

There is a vacancy on Plans Sub-Committee No.1 which DCC Members are requested to fill.

2. **RECOMMENDATION**

That a Member be appointed to serve on Plans Sub-Committee No. 1 for the remainder of the Municipal Year 2011/12.

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Excellent Council.
-

Financial

1. Cost of proposal: No cost
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: Democratic Services
 4. Total current budget for this head: £344,054
 5. Source of funding: Existing 2011/12 budget
-

Staff

1. Number of staff (current and additional): There are 9 posts (8.22 fte) in the Democratic Services
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: No statutory requirement or Government guidance.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No.
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

- 3.1 As a result of former Councillor George Taylor's resignation in August 2011, it has become necessary to appoint a replacement Member to serve on Plans Sub-Committee No. 1 for the remainder of the Municipal Year 2011/12. The composition of Plans 1 Sub-Committee is nine Members of the Council (seven from the Conservative Group and one from each of the Liberal Democrat and Labour Groups).

Non-Applicable Sections:	Policy, Financial, Legal and Personnel
Background Documents: (Access via Contact Officer)	

This page is left intentionally blank

Report No.
DRR11/125

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **RENEWAL AND RECREATION BUSINESS PLAN 2011/12**

Contact Officer: Hannah Jackson, Project Officer
Tel: 020 8313 4456 E-mail: hannah.jackson@bromley.gov.uk

Chief Officer: Marc Hume, Director: Renewal & Recreation

Ward: All

1. Reason for report

1.1 Following its adoption by the Portfolio Holder on 5th July 2011, the Renewal & Recreation Policy Development and Scrutiny Committee referred the Renewal & Recreation Business Plan 2011/12 (**Appendix 1**) to the Development Control Committee for noting.

2. **RECOMMENDATION(S)**

2.1 The Development Control Committee is asked to note the Renewal & Recreation Business Plan 2011/12 (**Appendix 1**).

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Vibrant Thriving Town Centres.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: Renewal & Recreation/Resources Portfolio Budget 2011/12
 4. Total current budget for this head: £10m (Renewal & Recreation) and £992k (Resources)
 5. Source of funding: Existing controllable revenue budget 2011/12 plus external resources where identified
-

Staff

1. Number of staff (current and additional): 320 FTE (R&R Portfolio) + 47 FTE (Resources Portfolio)
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: <please select>
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): all those resident in the London Borough of Bromley
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No.
2. Summary of Ward Councillors comments:

Decision Maker: Renewal & Recreation Portfolio Holder

Date: 5th July 2011

Decision Type: Non-Urgent Executive Key

Title: **RENEWAL & RECREATION BUSINESS PLAN 2011/12**

Contact Officer: Colin Brand, Assistant Director: Renewal & Recreation
Tel: 020 8313 4107 E-mail: colin.brand@bromley.gov.uk

Chief Officer: Marc Hume, Director: Renewal & Recreation

Ward: All

1. Reason for report

- 1.1 This report outlines the draft Renewal & Recreation Business Plan for 2011/12 and seeks the Portfolio Holder's endorsement. The full document is attached at **Appendix 1**.
-

2. RECOMMENDATION(S)

The Renewal & Recreation PDS Committee is asked to:

- 2.1 Note and comment on the draft Renewal & Recreation Business Plan 2011/12, attached at Appendix 1;
- The Portfolio Holder is asked to:
- 2.2 Consider any comments made by the Renewal & Recreation PDS Committee and subject to any amendments or additions, approve the draft Renewal & Recreation Business Plan 2012 attached at Appendix 1, for adoption.

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Vibrant Thriving Town Centres. Supporting Independence and an Excellent Council
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: Renewal & Recreation/Resources Portfolio Budget 2011/12
 4. Total current budget for this head: £10m (Renewal & Recreation) and £992k (Resources)
 5. Source of funding: Existing controllable revenue budget 2011/12 plus external resources where identified
-

Staff

1. Number of staff (current and additional): 320 FTE (R&R Portfolio) + 47 FTE (Resources Portfolio)
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: <please select>
 2. Call-in: <please select>
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): all those resident in the London Borough of Bromley
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No.
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 The draft Renewal & Recreation Business Plan 2011/12 is being presented to the Renewal & Recreation PDS Committee for comment and to the Portfolio Holder for review and endorsement.
- 3.2 The draft plan outlines how the department will deliver our key priority: vibrant thriving town centres. Six strategic outcomes focus our efforts in supporting our key priority:
- i) Vibrant, thriving town centres
 - ii) Protection, conservation and enhancement of the natural built environment
 - iii) Enhancing opportunities for leisure, recreation and the arts
 - iv) Developing opportunities for residents to improve skills, learning and employment prospects
 - v) Managing property assets to support the delivery of the Council's key objectives
 - vi) An effective and efficient department that provides value for money
- 3.3 The Business Plan demonstrates how these strategic outcomes will be achieved by establishing aims and actions that show how we will deliver our Building a Better Bromley promises. Milestones and targets enable progress to be measured and monitored.
- 3.4 Outcome statements create a narrative through the plan and set the context for the strategic outcomes. Actions are linked with Renewal & Receptions corporate excellence indicators that measure the Council's excellence 'in the eyes of local people.'
- 3.5 In 2010/11 Renewal & Recreation made some significant and innovative steps in the delivery of our key priority, despite the difficult financial climate. Whilst 2011/12 promises to be just as challenging, we are confident that it can be just as successful, responding to the efficiency programme both creatively and imaginatively in order to ensure that residents continue to receive a high quality service from an effective and efficient Council that provides value for money.
- 3.6 The Renewal & Recreation PDS Committee will receive monitoring reports on the implementation of the Business Plan and quarterly performance management information will be included in the Council-wide 'Are We on Track' (AWOT) reports.
- 3.7 The Committee is invited to comment on the plan and make recommendations to the Portfolio Holder with respect to any amendments and/or additions.
- 3.8 The Portfolio Holder is invited to review the recommendations of the Renewal & Recreation PDS Committee and to agree the draft Renewal & Recreation Business Plan 2011/12 (attached at **Appendix 1**) for adoption.

4. POLICY IMPLICATIONS

- 4.1 The plan's outcomes, aims and actions contribute towards the 'Building a Better Bromley' priorities and towards meeting relevant legislative requirements. In particular, they contribute towards: vibrant, thriving town centres, supporting independence and an excellent council.

5. FINANCIAL IMPLICATIONS

- 5.1 The draft plan detailed in Appendix 1, will be implemented using the agreed controllable revenue budget for 2011/12 for both the Renewal and Recreation Portfolio and the Resources Portfolio (Property), together with any additional external funding that officers secure throughout the year.

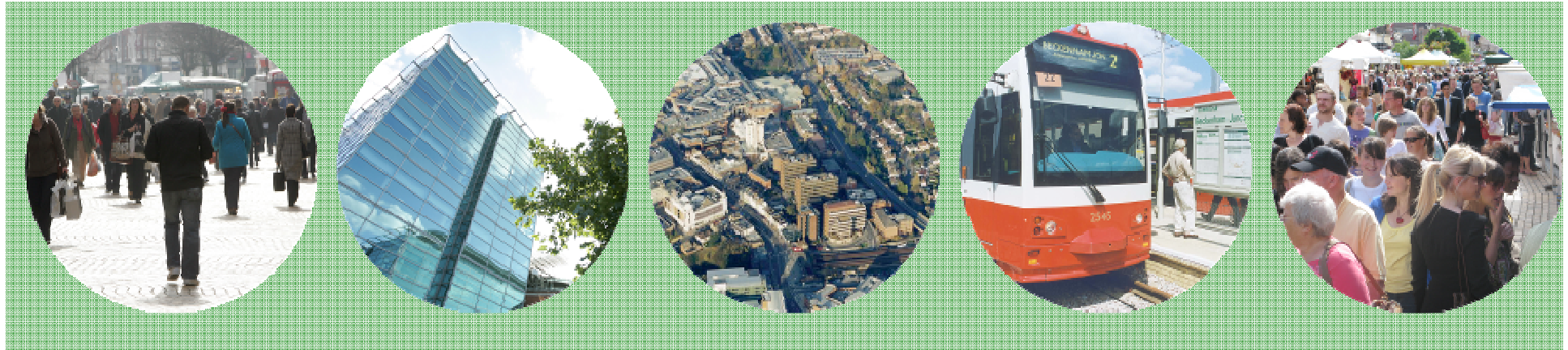
Non-Applicable Sections:	Legal and Personnel Implications
Background Documents: (Access via Contact Officer)	Building a Better Bromley 2011/12



THE LONDON BOROUGH

Renewal & Recreation

BUSINESS PLAN 2011/12



A Vibrant Thriving Borough

FOREWORD

Services delivered as part of the Renewal & Recreation department's portfolio make a vital contribution to the quality of life experienced by residents.

These services support the Council's priorities set out in the 'Bromley 2020 Vision' and 'Building a Better Bromley.'

Our key priority is that the borough remains a thriving and vibrant place. We will ensure that our town centres are successful and competitive, through a combination of sensitive planning and major private sector investment. We aim to make the London Borough of Bromley a place where people choose to live, work and shop.

We also make significant contributions to other council priorities including supporting independence, a quality environment and an excellent council.

We will be working towards six strategic outcomes for 2011/12 which will focus our efforts in supporting our key priority:

1. Vibrant, thriving town centres
2. Protection, conservation and enhancement of the natural and built environment
3. Enhancing opportunities for leisure, recreation and the arts
4. Developing opportunities for residents to improve skills, learning and employment prospects
5. Managing property assets to support the delivery of the Council's key objectives
6. An effective and efficient department that provides value for money

This business plan details how these strategic outcomes will be achieved and how progress will be measured.

Key Themes for 2011/12

Although 2010/11 was a challenging year, Renewal & Recreation made some significant and innovative steps in the delivery of a vibrant and thriving borough, despite the difficult financial climate.

Bromley

Delivery began on the first stage of the Bromley Area Action Plan after it was agreed by the Secretary of State and adopted by the Council. For example, we have finalised the Concept Design for **Bromley North Village** and secured initial investment of £300,000 for detailed design work from Transport for London, who have earmarked a further £3million for its implementation.

In 2011/12, we will continue delivery of the Bromley Area Action Plan. We will finalise and consult on the detailed design work and will consider the relocation of existing markets to the Bromley North Village area. Delivery will also include developments to the Pavilion Leisure Centre which will feature improved gym facilities and a new ten pin bowling alley.

Last year also saw the delivery of a successful events and promotion programme in partnership with local businesses which support the vitality of the borough's town centres, with a particular focus on **Bromley**. The special event commemorating the Battle of Britain brought Bromley High Street to a standstill as the public came to honour the valour of RAF pilots.

We plan to continue this success in the coming year as Bromley will play host to several town centre events including a major civic ceremony to celebrate the Queen's Diamond Jubilee.

In 2010/11 we re-tendered the Churchill Theatre management contract for £1.2 million over 5 years, creating significant savings for the public purse whilst retaining the Ambassador Theatre Group, ensuring the maintenance of a broader night time economy in Bromley Town Centre. In 2011/12 we will re-wire the theatre ready for when it will re-open in September 2011 with an exciting new programme.

Orpington

As the borough second largest town centre, the Council is committed to supporting the development and vitality of **Orpington**. 2010 saw the completion of public realm works on Orpington High Street which improved the area's attractiveness, accessibility and overall user experience. The works were highly commended at the London Transport Awards and 83% of businesses in Orpington agree that the High Street had improved. Furthermore, in May 2011 Orpington Library successfully relocated to a central and more accessible town centre location, receiving 11,000 visits in its first week of opening.

The business plan demonstrates how we intend to build on these improvements in 2011/12. For example, we will finalise proposals for Bromley Museum and the old library site which will include the submission of a £3million bid to the Heritage Lottery Fund, secure funding to re-clad the external elevations of the Walnuts Leisure Centre and to initiate consultation on a Business Improvement District for Orpington to generate a sustainable town centre management model for the town.

The vitality of the borough's smaller town centres is an important aspect of the work we do to support our key priority. We plan to continue to maintain and improve the appearance, tidiness and overall quality of the borough's town centres in 2011/12.

We also plan to draft and consult on a Master Plan for **Penge** town centre, as part of which we will consider options for a new library service in the area.

Last year noted some important developments which enhanced the leisure, recreation and arts offer in the borough. In May 2010, **Biggin Hill** saw the opening of the borough's first combined leisure hub hosting a 25 meter six lane swimming pool and a state of the art library.

We aim to further improve and expand the network of leisure facilities across the borough in 2011/12 including through further developing proposals for a multi-sports hub at Norman Park in **Bromley**, a new gymnastics centre and library at the Bromley Valley Gymnastics/Cotmandene site in **St**

Paul's Cray and developing a new parks, leisure and sports delivery model at **Crystal Palace** Park in line with the Crystal Palace Master Plan. It is also important that we derive the maximum benefit from the 2012 Olympic and Paralympic Games.

Borough-wide initiatives

Support to those who live and work within the borough is a key theme in this business plan and demonstrates our contribution to other council priorities including supporting independence.

In 2011/12, we will continue to work to raise Bromley's profile as a place to invest and do business. Last year we saw a 13% increase in start up businesses from the previous year which was supported through the provision of information and signposting from our Business Support Team.

2010/11 saw the successful delivery of a number of initiatives to help people into employment. The Future Jobs Fund created 66 posts with the London Borough of Bromley and our partner organisations for young unemployed people to help them gain skills and experience to recommend them for further employment. 70% of those employed as part of the programme found work after leaving their Future Jobs Fund role.

Similarly, Thyme Out, a horticultural project for adults with learning disabilities saw all participants achieve a qualification in amenity horticulture and the majority move on into paid or unpaid work. The team also won the prestigious Green Flag award for their work on Palace Gardens, Bromley. In 2011/12 we will be working up a Stage 2 application to continue the project into 2013.

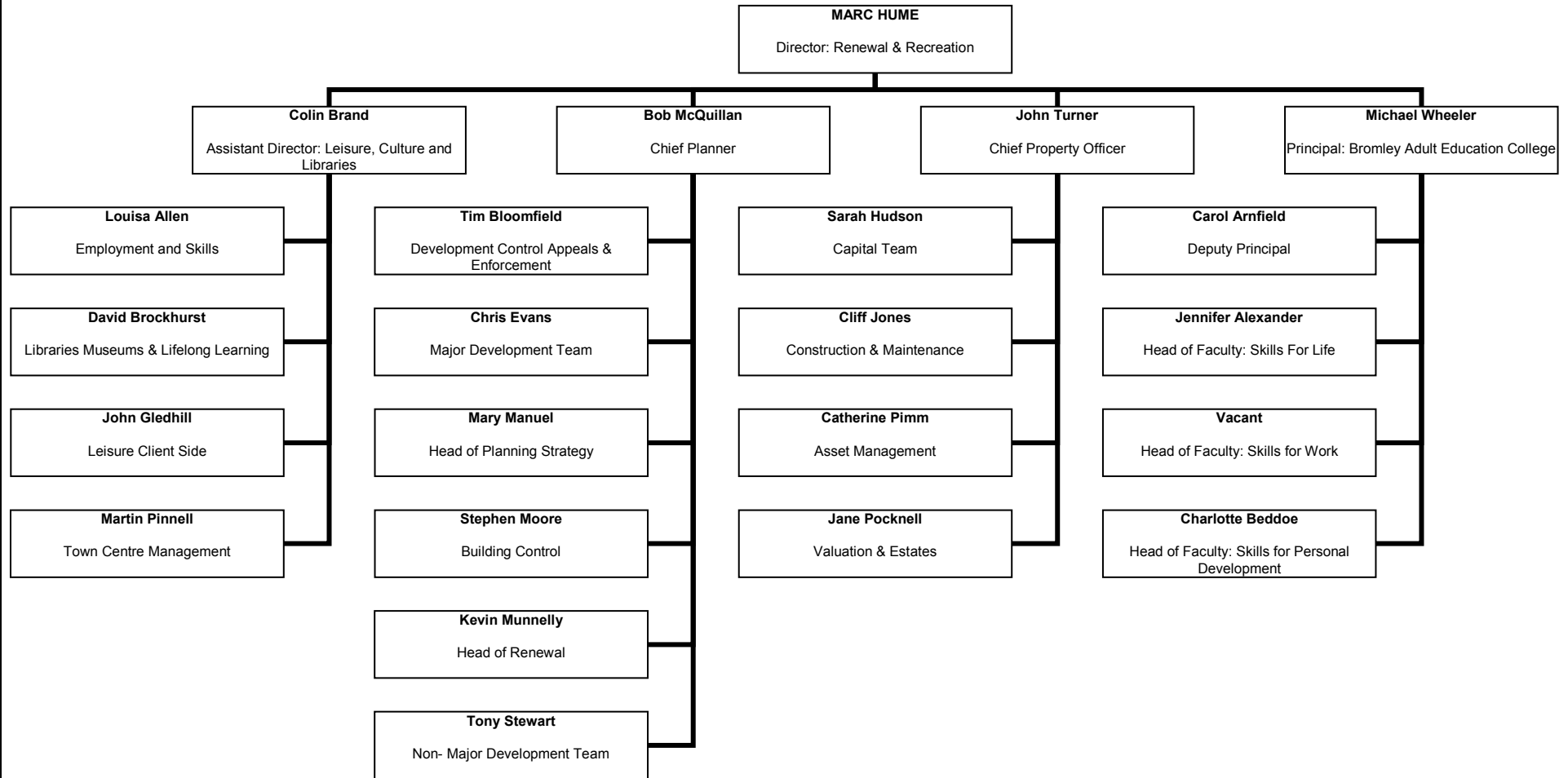
In 2011/12, we aim to maintain a high quality adult education service which offers a range of accessible courses designed to meet the needs of local people. We also plan to maximise the potential of the Cotmandene Resource Centre, St Paul's Cray and the **Mottingham** Learning and Community Shop to provide information, advice and guidance on adult learning and employment support through exploring future management opportunities.

Whilst 2011/12 promises to be just as challenging as the previous year, we are confident that it can be just as successful, responding to the efficiency programme both creatively and imaginatively in order to ensure residents continue to receive a high quality service from an effective and efficient Council that provides value for money.

CONTENTS

Departmental Structure	6
Outcome 1 Vibrant and thriving town centres	7
Outcome 2 Protection, conservation and enhancement of the natural and built environment	14
Outcome 3 Enhancing opportunities for leisure, recreation and the arts	17
Outcome 4 Developing opportunities for residents to improve skills, learning and employment prospects	20
Outcome 5 Managing property assets to support the delivery of the Council's key objectives	25
Outcome 6 An effective and efficient department which provides value for money	29
Appendix 1 Bromley Area Action Plan: Site Map	31
Abbreviations and Glossary	
R&R	Renewal and Recreation
ES	Environmental Services
PDS	Performance, Development & Scrutiny
I, E&E	Improvement, Efficiency & Effectiveness
LBB	London Borough of Bromley

DEPARTMENTAL STRUCTURE



OUTCOME 1: VIBRANT AND THRIVING TOWN CENTRES

Division(s) Responsible: Property; Leisure & Culture; Planning

Outcome Statements

- The Council will work with development partners to create new and innovative schemes and projects that provide a sense of identity and vibrancy and that give local people pride in where they live and work
- The local authority will look to utilise its planning power to promote and create balanced vibrant and thriving town centres
- The Council will work with local retailers and businesses to protect their long term future and encourage people to visit, shop and stay in the borough's town centres

Excellence Indicators

1. Progress made against Opportunity Sites in Bromley Town Centre in accordance with the phasing in the adopted Area Action Plan
2. Increased vitality in the borough's retail areas
3. Support and advice offered to small and medium sized enterprises

Aim 1a: Delivery of the first phase of the Bromley Area Action Plan
(Please see Appendix 1 for site locations.)

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Review and market test development options for Site G west of the High Street and market the site with a view to procuring and selecting a long term Development Partner	Undertake design workshops	June 2011	Existing resources	Kevin Munnelly	1
	Confirm development proposition	September 2011			
	Undertake technical support studies (including flood risks etc)	Ongoing			
	Draft Marketing and Material for Executive approval	Report to Executive in October 2011			

Work with Development Partner (Cathedral Group) to agree detailed scheme design and secure planning permission for Westmoreland Road car park site. Secure vacant possession by September 2012 with work on site by November 2012	Support development partner to submit their planning application by October 2011	Secure planning approval by March 2012	Existing resources	Heather Hosking /Project Team	1
Finalise and consult on detail scheme designs for the Bromley North Village public realm improvements and secure all necessary statutory approvals and drawn down of £3m on capital funding from Transport for London. Implementation to commence late summer 2012	Submit detailed designs to R&R PDS Committee for approval to consult	October 2011	Existing resources	Kevin Munnelly /Project Team	1
Complete the development of the Pavilion Leisure Centre with a ten pin bowling facility by Spring 2012	Deliver construction and contract programme	Completion of works by March 2012	LBB Capital	Colin Brand	1
Grant lease, decant and agree development agreement for Site C (Former Town Hall and South Street car park) to secure planning permission and listed building consent	Within the timeframe of the six month exclusivity agreement signed with the Land Group, agree the scope and content of the Planning Listed Building applications	<ul style="list-style-type: none"> Establish monthly joint project meetings with the Land Group by June 2011 Agree work programme by July 2011 	Existing resources	Heather Hosking/ Kevin Munnelly	1
Work with Network Rail and South Eastern to agree improvement plans and secure implementation at Bromley South station upgrades (Site J)	Agree initial scheme design and programme and implement step free access by March 2012	<ul style="list-style-type: none"> Approve Prior Notification application by August 2011 Agree lease extension by August 2011 Examine parking enforcement options by August 2011 	Network Rail	Kevin Munnelly /Iain Forbes	1

Complete a memorandum of undertaking with development partners on the redevelopment of Bromley North Station (Site A)	Defend the raised legal challenge (expected hearing date – Summer 2011)	Provide written legal responses in accordance with the legally specified timeframe (dates to be confirmed)	£60,000 allocated by the Executive	Bob McQuillan /Kevin Munnelly	1
Work with site owners to agree a scheme proposal for Site L (DHSS building & Bromley Christian Centre) that is in conformity with the adopted planning framework	Secure the memorandum of understanding by March 2012	<ul style="list-style-type: none"> Establish monthly joint project team meetings with Trillium Real and Bromley Christian Centre by August 2011 Agree work programme by August 2011 	Existing resources	Kevin Munnelly	1

Aim 1b: Continue to support and develop the vitality of Orpington					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Promote usage of the relocated library in partnership with local businesses	To maintain high levels of usage of the newly refurbished library	12 events to be successfully arranged by the end of March 2012	Leisure & Culture	Martin Pinnell/ Tim Woolgar	2
Finalise proposals for the Bromley Museum and old library site, including submission of a £3million Heritage Lottery Fund bid	Extend the museum offer into a newly refurbished and modernised building utilising space vacated by the library	<ul style="list-style-type: none"> First round application to the Heritage Lottery Fund submitted in June 2011 Notification on success of first round application from awarding body in September 2011 Develop second round application in October 2011 and onwards 	Heritage Lottery Fund Development Grant / Leisure & Culture	Colin Brand	2
	Seek to work with the Metropolitan Police Service to relocate their service delivery point to the vacant library	<ul style="list-style-type: none"> Agree lease details and impact on the Heritage Lottery Fund scheme Facilitate the Police move in September 2011 			

Working with private sector partners /landowners to draft a planning brief to guide the future development opportunities in the Walnuts area and if possible to include the re-cladding of the leisure centre.	Instruct Development Advisors to undertake bi-lateral discussions with landowners	Draft development brief for consultation purposes and gain approval from the Development Control Committee by March 2012	Planning	Kevin Munnelly	2
	Develop a costed and detailed design solution to clad the Walnuts Leisure Centre and investigate funding opportunities	March 2012	Leisure & Culture	Colin Brand	
Work with businesses in Orpington to encourage and support the proposed establishment of a Business Improvement District aimed at bringing potential improvements to the town centre	Initiate consultation on possible BIDs for Orpington to generate a sustainable town centre management model for the town	<ul style="list-style-type: none"> Undertake initial consultation and feasibility September 2011 (under review) Obtain member approval for formal consultation in October 2011 (under review) Set up Steering Group in October 2011 (under review) Draft BID proposal for consultation by January 2012 (under review) If consultation is positive, formal notification of BID ballot in March 2012 – for ballot in summer 2012 (under review) 	Leisure & Culture	Martin Pinnell	2

Aim 1c:	Promote and support the vitality of all town centres				
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Delivery of an events and promotion campaign in partnership with local businesses	Successful delivery of a programme of at least 25 public events at town centre locations across the borough	Delivered by March 2012	Leisure & Culture	Martin Pinnell	2

Continue to maintain and further improve the appearance, tidiness and overall quality of all the town centres in Bromley	Christmas lights displays facilitated in all the managed town centres subject to private sector funding as agreed by the R&R PDS Committee in April 2011	Delivered by the end of November 2011	Leisure & Culture	Martin Pinnell	2
	Four quarterly environmental quality monitoring visits in four main towns by the end of March 2012 with issues tackled in conjunction with Environmental Services	May/July/October 2011 and January 2012			
Development and enhancement of town centre partnerships, including support for business and traders groups	Facilitation of bi-monthly meetings for Orpington Business Forum, Beckenham Business Association and Penge Traders Association and support the establishment of Bromley Town Centre forum.	200 businesses attending forum meetings during 2011/12. 1000 businesses engaged through communications	Leisure & Culture	Martin Pinnell	2
Review the management of town centre markets and other activities to maximise positive impacts and reduce costs.	Complete review in liaison with Environmental Services to include markets, attractions and rides across all key high streets.	Report to R&R and ESD PDS Committees by October 2011	Leisure & Culture	Martin Pinnell	2
Create a Penge Master Plan and consider options for a new library service in the area.	Draft Project Initiation Plan	Report to R&R PDS Committee in October 2011	Existing resources	Kevin Munnelly	2
	<ul style="list-style-type: none"> • Undertake stakeholder workshop • Draft and implement the initial improvement programme 	October 2011			
	Consider opportunities for a new Penge/Anerley library	Report to Members and identify suitable premises.	Leisure & Culture	Colin Brand	

Aim 1d: Promote business investment and development, particularly in the borough's key commercial and industrial areas.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Work with private sector partners to develop a high profile showcase 'Invest Bromley' event, with accompanying brochure	Establish monthly joint project team meetings with 3 Fox International and agree a work programme by April 2012	Invest Bromley Event to go ahead on 20 th September 2011.	Existing resources	Kevin Munnelly	3
Develop an inward investment and business incentive plan to encourage private sector investment in Bromley North Village	Create draft plan and include key elements in Mayor's Outer London Fund	July 2011	Mayor's Outer London Fund/Leisure & Culture	Martin Pinnell	3
	Implement plan	March 2012			
Distribution and promotion of new Bromley Business Guide and Directory	Distribute two thirds of copies received and run PR campaign to publicise	March 2012	Leisure & Culture	Martin Pinnell	3
Work with commercial property agencies and other partners to encourage take up and re-use of vacant commercial space	Facilitate Commercial Property Agents forum once per quarter; Promote the Commercial Property database via web, press and networking to encourage use by agents and businesses	Number of searches on property database: 7500 during 2011/12	Leisure and Culture	Martin Pinnell	3
Maintain regular communications with businesses through e-bulletin and website to raise awareness of local business support and networking, and to showcase town centre opportunities	Ensure publication and distribution of bi-monthly e-bulletin to over 2600 business mailboxes	May/July/September/November 2011 and January /March 2012	Leisure & Culture	Martin Pinnell	3
	Encourage visits to the Business section of Council website through press releases, networking and the business directory				

Work with business support agencies and private sector partners through the Economic Partnership to encourage and develop business support provision in the borough	Facilitate meetings of the Economic Partnership four times per annum	April/July/October 2011 and January 2012	Leisure & Culture	Martin Pinnell	3
---	--	--	-------------------	----------------	---

OUTCOME 2: PROTECTION, CONSERVATION AND ENHANCEMENT OF THE NATURAL AND BUILT ENVIRONMENT

Division(s) Responsible	Planning
-------------------------	----------

Outcome Statement	The Council will seek to ensure that it provide and effective and efficient planning service for the residents of the borough that supports the London Development Framework.
--------------------------	---

Excellence Indicators	<ol style="list-style-type: none"> 1. Effective and efficient planning application service 2. Value for money building control service 3. Speedy and accurate response to land charge searches 4. Enforcement of actionable breaches of planning control
------------------------------	--

Aim 2a: Ensuring the ongoing effectiveness of planning regulatory functions

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Continue to perform at a level which exceeds the national targets for processing planning applications.	To meet national targets for major, minor and other applications	To be monitored quarterly: <ul style="list-style-type: none"> • Major applications: to determine 60% within 13 weeks of receipt • Minor applications: to determine 65% within 8 weeks of receipt • Other applications: to determine 80% within 8 weeks of receipt 	Planning	Bob McQuillan	1

Aim 2b: Complete Bromley Local Development Framework and core strategy and to deliver against key Local Development Framework milestones.

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Preparation of Core Strategy Issues document which will replace the Unitary Development Plan which sets out the Council's Planning Policy.	Prepare draft document and obtain agreement from the Executive	Report to Executive – May 2011	Planning	Mary Manuel	1, 2, 3, 4
	Consult with residents and the wider community on the Core Strategy Issues document	Awareness of document to comment on via website, letters and information to residents, businesses and stake holders between June – September 2011			
	Prepare the next key stage of Core Strategy (Options/Draft Core Strategy)	Executive to review draft document by December 2011			
Refine evidence base collected to justify the conclusions and strategies in the Core Strategy Issues document to ensure it is robust for detailed examination in public	Robust evidence which demonstrates strategy is sound and meets legislative requirements set out in the Town and Country Planning Act 2004.	Publish background and topic papers by January/February 2012	Planning	Mary Manuel	1
Performance management and publication of monitoring related to all Local Development Framework documents and 'saved' Unitary Development Plan policies including Bromley Area Action Plan and 'saved' Unitary Development Plan policies	Meet legislative requirements of the Town and County Planning Act 2004 and to ensure effectiveness of planning documents	Publication of monitoring reports annually.	Planning	Mary Manuel	1

Aim 2c: Promote, protect and enhance the historical, natural and built environment of the borough					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Promote the London Green Grid which recognises and protects the open space in Bromley, Croydon and Sutton.	Recognise the key roles green infrastructure and space play in nourishing quality of life	<ul style="list-style-type: none"> Consultation on Supplementary Planning Guidance as part of the London Plan by June 2011 Response submitted before the consultation deadline - June 2011. 	Planning	Kevin Munnelly	2
Enhance the built environment in Bromley, Beckenham and Penge	Detailed design for Bromley North Village.	Designs completed by March 2012	Planning and Highways	Kevin Munnelly	1,4
	Implementation of the first stage of the Penge Improvement Plan.	Ongoing			
	Undertake preparatory work in support of an Area Based Bid to Transport for London 2012/13 for a major Public Realm Improvement Scheme for Beckenham Town Centre	Report to R&R PDS Oct 2011 to set out timetable and scope of works			
Protect trees, listed buildings and conservation areas in the borough	Conservation Management Plan for Bromley Town Centre	September 2011	Planning	Kevin Munnelly	3
	Responding to requests for Tree Preservation Orders Listed Buildings Orders and Conservation Areas Designation	Ongoing – monitored annually			

OUTCOME 3: ENHANCING OPPORTUNITIES FOR LEISURE, RECREATION AND ARTS

Division(s) Responsible: Leisure & Culture

Outcome Statement:

- Physical development projects are enhanced when combined with programmes that encourage greater participation and engagement.
- Cultural programmes add value and quality of life through out the development process and bring on-going activity to the area.
- Leisure, culture and recreation are essential in creating a sense of place.

Excellence Indicators

- Develop and enhance opportunities for sports, leisure and culture
- Improved and enhanced physical network of libraries coupled with a broader customer offer
- Co-ordinate the borough's heritage offer in a strategic manner for the benefit of local communities

Aim 3a: Identify further opportunities to modernise/improve the library offer

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Promote use of the newly refurbished library	Official opening and promotion of the new library in Orpington	Official opening on 2 nd July 2011	Leisure & Culture	Martin Pinnell	2
Complete and implement Library site officers review	Undertake a formal review of the library site officer function	September 2011 for implementation on 1 st April 2011	Leisure & Culture	Colin Brand	2
Following the R&R PDS Members Working Party, explore and develop options for future management of the Library service in light of agreed budget reductions	<i>Phase 1:</i> to develop a 'shared services' agreement with the London Borough of Bexley to deliver the back office and strategic management of both authorities' library service.	<ul style="list-style-type: none"> R&R PDS Committee -July 2011 Report to Executive 20th July 2011 Shared service agreement to go live from April 2012 	Leisure & Culture	Colin Brand	2
	<i>Phase 2:</i> To investigate and consult on further options linked to efficiency savings within the library service	Report to R&R PDS/PH October 2011			

Aim 3b: Continue to explore funding opportunities and new business models to develop new capital projects to improve the Council's leisure and sports facilities.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Further develop proposals for a multi sports hub at Norman Park and seek a private sector development partner to fund and deliver a suitable scheme.	Develop and sign off development brief	Report to R&R PDS Committee in July 2011 Report to Executive July 2011	Leisure & Culture	John Gledhill	1
	Complete tender to decide on suitable partner company to deliver scheme.	<ul style="list-style-type: none"> Place an advert for expressions of interest – January 2012 Determine successful expression of interest and report to Committee on detailed proposals and scheme - December 2012 			
Further develop proposals for the development of new gymnastics centre and library at the Bromley Valley Gymnastics/Cotmandene sites.	Investigate options for and develop proposals for a major sports and community legacy hub in St Paul's Cray that includes a library provision.	Report to R&R PDS in October 2011 Executive in November 2011	Leisure & Culture	Colin Brand	1
Ensure the Borough maximises the benefits and legacies provided by the London 2012 Games, including opportunities for residents and businesses to participate.	Report to R&R Committee	July 2011	Leisure and Culture	John Gledhill	1
	Subject to Members approval, lead the work of the Borough's Olympic Group and seek to: <ul style="list-style-type: none"> Facilitate the visit of the Torch Relay to the Borough Dress the Borough through the London 2012 'Look and Feel' funding Develop suitable events and activities 	Subject to Members approval, delivery of targets within Working Action Plan: <ul style="list-style-type: none"> Co-ordinate the Boroughs response to the Games - ongoing Agree plan for dressing the Borough with the London Organising Committee of the Olympic Games (LOCOG) – September 2011 Agree route for Torch Relay with LOCOG - November 2011 			

Provide the Borough lead on Pro Active Bromley and co-ordinate the work on the group.	Develop a new frame work strategy	July 2011	Leisure and Culture	John Gledhill	1
	Develop annual work programmes for Pro Active Bromley sub groups Deliver key actions within the framework for 2011/12	<ul style="list-style-type: none"> • Increase participation, and widen access in sport and physical activity. • Engage more young people in sport and physical activity • Create better sport and physical activity pathways and infrastructure, and identify and seek external grants and commissions 			
To develop the parks, leisure and sports offer at Crystal Palace park in line with the Crystal Palace Masterplan.	To plan and set up a structure to engage with the community, stakeholders, neighbouring boroughs and those involved in site management to establish the vision for Crystal Palace Park, exploring options for governance and future management of the site.	<ul style="list-style-type: none"> • Produce a Project Plan and report to R&R PDS in October 2011 • Establish a project board by October 2011 • Establish working parties by October 2011 • Organise small infrastructure improvements by March 2012 • To investigate options for an alternative management company to undertake the maintenance and future development of Crystal Palace Park. 	Leisure and Culture	Louisa Allen	1

OUTCOME 4: DEVELOPING OPPORTUNITIES FOR RESIDENTS TO IMPROVE SKILLS, LEARNING AND EMPLOYMENT PROSPECTS.

Division(s) Responsible: Adult Education; Leisure & Culture

Outcome Statements

- The Council wants to develop individuals and communities by providing accessible, high quality learning opportunities and skills training
- To provide a free, friendly, welcoming employment and skills service providing clear Information, Advice and Guidance on learning and well-being for residents and their families

Excellence Indicators

1. Offer flexible learning opportunities to meet local needs and widen participation
2. Increase participation of adults in lifelong learning
3. Provide high standards of teaching and learning
4. Provide focused training programmes to prepare local people for employment, meeting the needs of employers and the nation
5. Provide value for money and ensure financial health within adult education
6. Tell us how we are doing – feedback from student satisfaction surveys

Aim 4a: Maintain a high quality adult education service which offers a wide range of accessible courses designed to meet local people's needs.

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
To undertake a comprehensive review of Bromley's Adult Education service	Agreed option in place for the start of 2012/13 academic year	The Review Board to identify possible options for delivery – July 2011 The Review Board to recommend preferred delivery option – October 2011 Undertake extensive consultation with all stakeholders – November 2011	Existing resources	BAEC Principal/ Chris Spellman	1,3,5
Increase participation of adults in lifelong learning	15,500 adults enrolled in learning opportunities at Bromley Adult Education College during the 2010/11 academic year	Cumulatively: <ul style="list-style-type: none"> • 7000 enrolments by Term 1 • 12000 enrolments by Term 2 • 15500 enrolments by Term 3 	Skills Funding Agency and learner fee income	BAEC SMT	1,2

	LBB staff members engaging in corporate training delivered by Bromley Adult Education College	600 members of staff across the 2010/11 academic year			
	Engage with new learners	47% of 9,500 learners are new learners at Bromley Adult Education College			
Identify individual learning needs which are supported by flexible learning opportunities	Enable learner to achieve their primary goals and complete their course	89% of learners achieve their individual primary learning goals during the 2010/11 academic year 92% of learners complete their course during the 2010/11 academic year	Skills Funding Agency and learner fee income	BAEC SMT	1,2
Engage with hard to reach learners within local communities and marginalised groups	Engage marginalised adults in learning opportunities in local community settings	Engage with 450 community project learners across the 2010/11 academic year	Skills Funding Agency	BAEC SMT	1,2
Work with partner agencies to support family learning in communities	Deliver the Bromley Children Project providing parents with learning opportunities Work in partnership with borough schools, libraries and community resource centres to support or deliver projects funded by external funding opportunities	<ul style="list-style-type: none"> 80% of the total number of learners enrolled in Family Learning to be resident in target wards (Cray Valley East, Cray Valley West, Penge, Anerley, Mottingham and Biggin Hill) 80% of learners enrolled in Family Literacy Language and Numeracy based courses to be resident in target wards (Cray Valley East, Cray Valley West, Penge, Anerley, Mottingham and Biggin Hill) 	Skills Funding Agency	BAEC SMT /Gail Eliston /Neil Hay	1,2
Work with partner agencies to actively promote learning opportunities available at Bromley Adult Education College	Partner community based agencies who can engage and signpost local people to appropriate learning	Work with 8 new partners within the community during the 2010/11 academic year	Skills Funding Agency and learner fee income	BAEC SMT	2

	opportunities delivered by the College				
Ensure that staff are appropriately qualified and supported to deliver a high standard of teaching and learning	Tutors and teachers hold recognised qualifications in accordance with Central Government Guidance	<ul style="list-style-type: none"> 42% of teachers to hold a Level 4 teaching qualification 30% to hold an intermediate teaching qualification 	Skills Funding Agency and learner fee income	BAEC SMT	3
	All tutors are observed at least once in the 2010/11 academic year	<ul style="list-style-type: none"> 20% of tutors to achieve a Grade 1 'Outstanding' 60% of tutors to achieve a Grade 2 'Good' 			
Provide a safe, secure and healthy environment for learners and staff	Review of teaching and learning environments at the Health and Safety Committee and at the Governing Body	Report to bodies six times annually	Skills Funding Agency and learner fee income	BAEC SMT/ Safety Committee /Premises Manager	3
Improve the environmental impact of College activities	Reduce paper consumption through the increased use of electronic technology (including electronic resources, communications and learning activities)	20% reduction to be achieved in the 2010/11 academic year	Skills Funding Agency and learner fee income	BAEC SMT	5
Monitor learner satisfaction with courses' value for money	Collect annual learner survey responses in the third term for the 2010/11 academic year	86% of respondents to rate value for money of their course as 'Very Good' or 'Good'	Skills Funding Agency and learner fee income	BAEC SMT	5,6

Work with partners to ensure that adults with learning disabilities are able to access progression routes into education, training and employment.	Continue to work with existing partners (including Shaw Trust, Adult & Community Services and community organisations) to develop additional training opportunities to encourage independent living and supported employment for adults with learning disabilities resident within the borough.	Engage with 92 adults with learning disabilities during the 2010/11 academic year Identify and work with three new partners during the 2010/11 academic year	Skills Funding Agency and learner income fee	BAEC SMT	1, 4
--	---	---	--	-------------	------

Aim 4b:	Provide high quality employment support services
----------------	---

Action	Milestones(s)	Target(s)	Resources	Lead Officer	EI
Proactively engage with Prime Contractors for DWP Work Programme to ensure delivery works for the benefit of Bromley residents	Host stakeholders event for local organisations to learn more about Work Programme delivery in Bromley	October 2011	Leisure and Culture	Louisa Allen	4
	Prime contractors invited to deliver programme in outreach centres	Before March 2012			
Maximise the potential of the Cotmandene Resources Centre and Mottingham Community Learning Shop to provide information, advice and guidance on adult learning and employment support.	Establish job clubs delivered by the local community in both Centres	Autumn 2011	Leisure and Culture	Louisa Allen	1,4
	Achieve Matrix accreditation (nationally recognised Quality Standard for providing Information, Advice and Guidance)	Application submitted by October 2011 with award granted by January 2012			
Work with the third sector to explore community training opportunities for the local and wider community	To continue to explore options for developing a sustainable community focused training, development and support network	<ul style="list-style-type: none"> Report to R&R PDS Committee in July 2011 Implementation by October 2011 		Colin Brand/ Louisa Allen	1,4

Aim 4c: Pursue funding opportunities with partners to increase the range of adult learning opportunities delivered in areas of need in the borough					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Attract funding from the Adult and Community Learning Fund	To create a stimulating and engaging adult learning programme in community settings in Bromley for 600 adult learners with a particular focus on the environment, employment and courses relevant to older learners	<ul style="list-style-type: none"> • Write and submit bid in June 2011 • Hear outcome of bid submission by July 2011 • If successful, deliver project between September 2011 – March 2012 	Leisure and Culture/ Adult and Community Learning Fund	Louisa Allen	1,4,5
Work up second stage proposal to Big Lottery: Reaching Communities to seek continuation funding of Thyme Out: an amenity horticulture project for adults with learning disabilities at the Civic Centre.	To provide adults with learning disabilities better life chances through training social inclusion increasing their employment and life skills and contributing towards their independence. All participants to have an opportunity to obtain a City & Guilds qualification in amenity horticulture	<ul style="list-style-type: none"> • Hear initial proposal outcome from awarding body by June 2011 • Submit bid to the awarding body in Autumn 2012 • Hear outcome of bid submission by January 2012 • If successful, deliver project between March 2012 – March 2015 	Leisure and Culture/ Big Lottery: Reaching Communities	Louisa Allen	1,4,5

OUTCOME 5: Managing property assets to support the delivery of the Council's key objectives.

Division(s) Responsible: Property

Outcome Statement: The council wants to ensure that its properties provide value for money for the residents of Bromley, are accessible, safe and enhance service delivery.

Excellence Indicators

1. Efficient utilisation of office space
2. Number of properties which have statutory servicing and inspection completed
3. Reduction in carbon output
4. Total rental income
5. Accommodation leased/shared with partners

Aim 5a: Complete alterations to the Civic Centre accommodation to make more efficient use of space, improve accessibility, lower energy consumption, and reduce future maintenance liability

Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Decant North Block	Liase with Client departments on space requirements. Carry out minor alterations to decant accommodation with appropriate IT and data provision	<ul style="list-style-type: none"> • Attend DMT and other forums to map details • Liase with Information Systems on alterations to IT infrastructure • Completion by June 2011 	Property /Information Systems /Organisational Improvement	Chris Johnson	1
Alteration works to North Block	Prepare drawings and specifications to enable procurement of suitable contractors	<ul style="list-style-type: none"> • Liase with Client departments on detailed requirements for new accommodation. • Tender works and place orders to enable start on site in June/July 2011 • Carry out contract administration whilst contractor on site • Completion by January 2012 	Property /Information Systems /Organisational Improvement	John Hemsley	1

Remodelling of Stockwell Building	Agree with Public Health requirements to move into Civic Centre	<ul style="list-style-type: none"> • Liaise with Public Health on layouts etc. • Prepare specification to enable works to commence on site July 2011 • Completion by October 2011 	Property	Chris Johnson	1
Completion of new reception facility	Ensure that appropriate facilities are in place to enable better access to services via a 'one stop shop option'	<ul style="list-style-type: none"> • Liaise with all stakeholders on particular requirements for the new facility • Prepare specification, tender works, appoint contractor and carry out works on site commencing July 2011 • Completion by January 2012 	Property	John Hemsley	1
Market the Old Town with vacant procession to aid the Council's aspirations around Town Centre re-generation	<ul style="list-style-type: none"> • Decant of Bromley Town Hall • Tender the sale of the Town Hall and carry out appropriate evaluation in order to recommend to Members a suitable development partner 	Prepare decant accommodation in the Civic Centre for the current occupants in the Town Hall and decant by January 2012	Property	Chris Johnson	1,4
Decant of Joseph Lancaster and Ann Springman Buildings to enable these buildings to be leased for other purposes, or demolished to reduce revenue outgoings or increase revenue income	Prepare accommodation in North Block for current occupants of these buildings	January/February 2012	Property	Chris Johnson	1,4

Aim 5b: Ensure that all the Council's properties meet legislative requirements and are fit for purpose.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Carry out suitable cyclical maintenance, inspections and surveys to ensure that buildings comply with current Property and Health & safety legislation, are accessible, and meet the requirements of residents and staff	Carry out asbestos re-surveys and risk assessments	March 2012	Property	David Streeter	2
	Update all access surveys	March 2012	Property	Andrew Brook	2
	Completion of 20% stock condition assessments	March 2012	Property	John Davies	2
	Carry out cyclical maintenance to meet water quality, electrical and gas regulations etc	March 2012	Property	Andrew Brook	2
	Completion of the Planned Maintenance programme for operational buildings	March 2012	Property	Andrew Brook	2

Aim 5c: Carry out energy saving projects to reduce the Council's carbon output.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Reduce the Council's energy consumption to reduce spend in a market with energy costs increasing. Reduce the carbon output to reduce the amount of carbon tax paid	Replacement of windows to North Block, Civic Centre	March 2012	Property	John Hemsley	3
	Planned programme of replacement windows and high efficiency boilers in schools	March 2012	Property	Cliff Jones	3
	Installation of PV panels to North Block, Civic Centre	March 2012	Property	Gerry Kelly	3
	Completion of CHP feasibility study at the Walnuts	March 2012	Property	Gerry Kelly	3
	Undertake feasibility study and business case for installation of PV panels at Central Depot	December 2011	Property	Gerry Kelly	3

Aim 5d: Maximise the income from the Council's property investment portfolio.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Reduce the number of vacant shops	Proactively market vacant shops using advertising, business forums and partner contacts	March 2012	Property	Neil Thomps on	4
Maximise income from vacant office space at Civic Centre and Yeoman House	Liaise with partner agencies to seek opportunities to lease Council space	March 2012	Property	John Turner/ Neil Thomps on	4
	Market Yeoman House vacant space with local estate agent	March 2012			

Aim 5e: Seek opportunities with partners to make efficient use of Council property to reduce costs and improve service delivery.					
Action	Milestone(s)	Target(s)	Resources	Lead Officer	EI
Put in place the Strategic Asset Management Strategy adopted by Members in May 2011	Prepare acquisition strategy to aid income and regeneration of Town Centres	July 2011	Property	Heather Hoskins	5
	Set up 'Total Place' group involving other Local Authorities, strategic partners and the 'third sector'	March 2012	Property	Cathy Pimm	5
	Prepare a disposal plan and market properties starting with four sites	October 2011	Property	Heather Hosking	5
	Prepare a 'property challenge' strategy for service departments	March 2012	Property	Cathy Pimm	5
	Set up a Member Strategic Asset Management group	July 2011	Property	John Turner	5

OUTCOME 6:	AN EFFECTIVE AND EFFICIENT DEPARTMENT WHICH PROVIDES VALUE FOR MONEY
-------------------	---

Division(s) Responsible:	All
--------------------------	-----

Outcome Statement	The Council will seek to ensure that it provides a well motivated and trained work force that provides value for money services in an efficient and effective manner.
--------------------------	---

Aim 6a:	A proactive and robust approach to improvement and efficiency in Renewal & Recreation
----------------	--

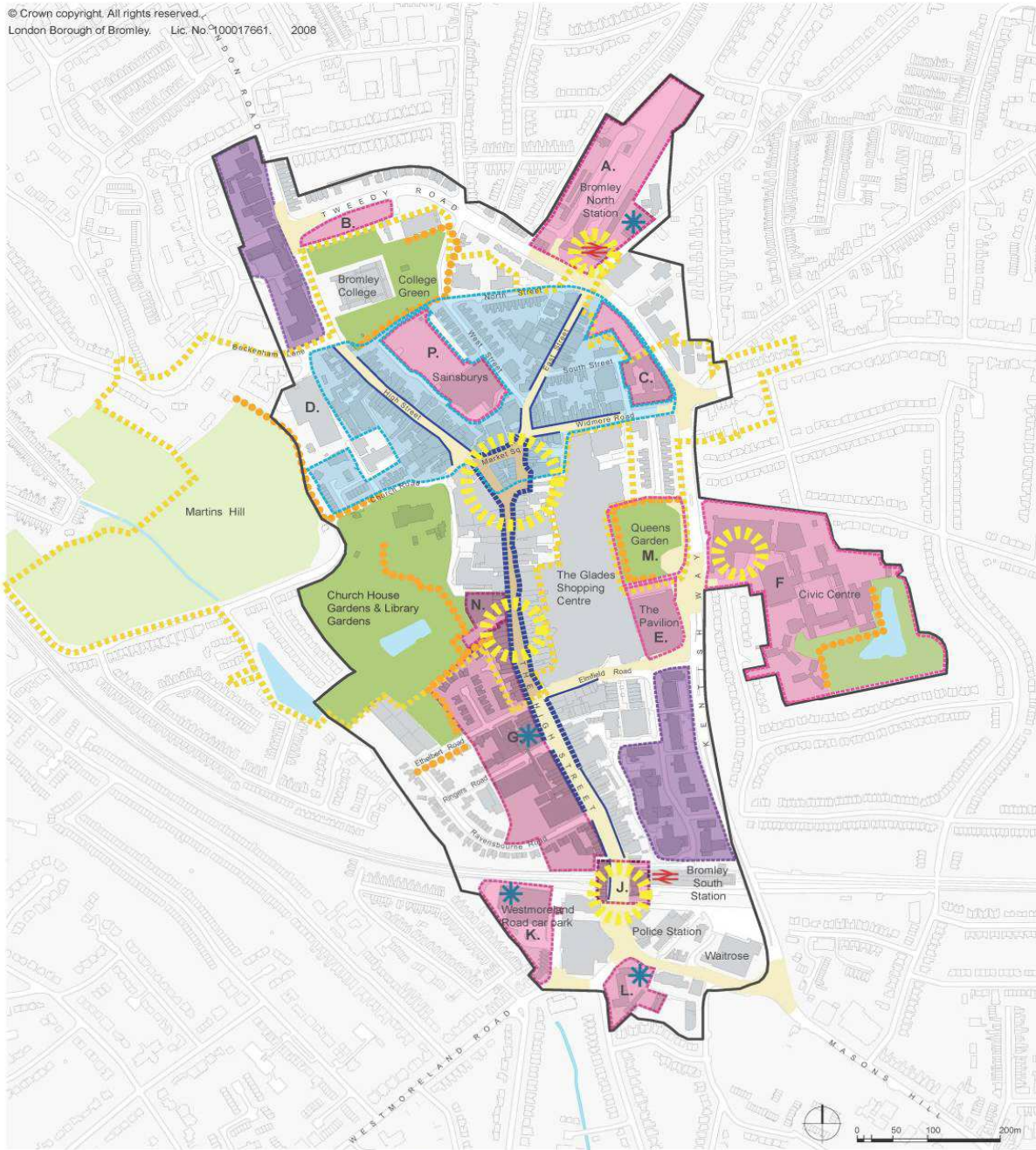
Action	Milestone(s)	Target(s)	Resources	Lead Officer
Deliver agreed efficiency savings in line with the Council's financial forecast		Quarterly monitoring of agreed efficiency savings with key reports as required	Existing resources	Marc Hume
Evaluate services' value for money and identify efficiency savings for 2013/14/15	All Assistant Directors to review individual service areas	June 2011	Existing resources	Marc Hume and Assistant Directors
Undertake a department wide 'zero' based budgeting exercise in conjunction with the member's 'Star Chamber'.	Agree with Finance a zero based budgeting pro-forma	May 2011	Existing resources	Marc Hume
	Complete pro-forma for each division	June 2011		
	Present findings to Member Star Chamber	August 2011		
Consider new methods of delivery to reduce dependence on the public purse.	As part of the I, E&E process, all Assistant Director's to investigate new methods of delivery in shared service/outsourcing		Existing resources	Marc Hume

Aim 6b:		Effective external and internal communications			
Action	Milestone(s)	Target(s)	Resources	Lead Officer	
Press releases that share information and good news with residents that will support departmental objectives	Appoint a dedicated Communications Officer for Renewal and Recreation	To undertake internal interviews in June 2011	Revenue	Colin Brand	
		If necessary, seek external candidate in July 2011			
		Officer in post in September 2011			
Quarterly departmental staff meetings	As part of the Departmental Communication Strategy, hold four director-lead staff meetings	Four meetings a year	Revenue	Marc Hume	
Provide excellent customer service first time in line with LBB's 'getting it right' procedure	Regularly monitor complaints, compliments and suggestions received across the department	Quarterly reports to the DMT	Existing resources	Colin Brand	

Aim 6c:		A motivated staff which is highly skilled to deliver departmental outcomes			
Action	Milestone(s)	Target(s)	Resources	Lead Officer	
Performance Appraisal Development Scheme documents to be set up for individual officers	All staff to complete PADS scheme incorporating REAL core values	June 2011 Review September 2011	Revenue	Colin Brand/John Turner/Bob McQuillan and Michael Wheeler	
Departmental Learning and Development Plan to be developed	The departmental learning and development plan to be completed following the completion of PADS	July 2011 with ongoing review	Resources	Learning and Development Team.	
Leadership Programme to be delivered	To integrate the department, all second and third tier officers participate in a cross departmental leadership programme	December 2011	Revenue	Michael Wheeler	

APPENDIX 1: BROMLEY AREA ACTION PLAN SITE MAP

© Crown copyright. All rights reserved.
London Borough of Bromley. Lic. No. 100017661. 2008



Key Diagram

- Town centre boundary
- Primary retail frontage
- Secondary retail frontage
- Business improvement areas
- North Village area improvement
- Bromley town conservation area boundary

- New / improved public spaces
- Improved public realm and / or building frontages
- Pedestrian area improvement
- Protected parks and open spaces
- Key frontages onto public spaces
- Possible locations for taller buildings

- Opportunity sites
- A. Bromley North Station
- B. Corner of Tweedy Road/London Road
- C. Former Town Hall and South Street car park
- E. Pavilion
- F. Bromley Civic Centre
- G. West of the High Street
- J. Bromley South
- K. Westmoreland Road Car Park
- L. DHSS building and Bromley Christian Centre, Bromley South
- M. Queens Garden
- N. Central Library / Churchill Theatre
- P. Sainsburys, West Street
- D. Hill Street Car Park (former opportunity site)

This page is left intentionally blank

Report No.
DRR11/123

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: Development Control Committee

Date: 17 November 2011

Decision Type: Non-Urgent Executive Non-Key

Title: PLANNING BUDGET MONITORING 2011/12

Contact Officer: Claire Martin, Head of Finance
Tel: 020 8313 4286 E-mail: claire.martin@bromley.gov.uk

Chief Officer: Marc Hume, Director of Renewal and Recreation

Ward: Boroughwide

1. Reason for report

This report provides an update of the latest budget monitoring position for 2011/12 for the Planning Division based on expenditure and activity levels up to 31 August 2011.

2. **RECOMMENDATION**

2.1 The Committee is requested to consider the latest projections that indicate that the Planning Division will be underspent by £127k.

Corporate Policy

1. Policy Status: Existing policy. Sound financial management
 2. BBB Priority: Excellent Council.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: Recurring cost.
 3. Budget head/performance centre: Planning Division
 4. Total current budget for this head: £3.359m
 5. Source of funding: Existing revenue budgets 2011/12
-

Staff

1. Number of staff (current and additional): 102ftes
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory requirement. The statutory duties relating to financial reporting are covered within the Local Government Act 1972; the Local Government Finance Act 1998; the Accounts and Audit Regulations 1996; the Local Government Act 2000 and the Local Government Act 2002
 2. Call-in: Call-in is applicable
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The services covered in this report affect all Council Taxpayers, Business Ratepayers, those who owe general income to the Council, all staff, Members and Pensioners.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments:

3. COMMENTARY

3.1 The 2011/12 projected outturn is detailed in Appendix 1, with a forecast of projected spend for each division compared to the latest approved budget and identifies in full the reason for any variances.

4. POLICY IMPLICATIONS

4.1 The Resources Portfolio Plan includes the aim of effective monitoring and control of expenditure within budget and includes the target that each service department will spend within its own budget.

4.2 The four year financial forecast report highlights the financial pressures facing the Council. It remains imperative that strict budgetary control continues to be exercised in 2011/12 to minimise the risk of compounding financial pressures in future years.

4.3 Chief Officers and Departmental Heads of Finance are continuing to place emphasis on the need for strict compliance with the Council's budgetary control and monitoring arrangements.

5. FINANCIAL IMPLICATIONS

5.1 Appendix 1 contains figures relating to the latest budget monitoring position for the Planning Division.

5.2 Shortfalls of income in Building Control, Land Charges and Planning are being partly offset by savings from management action. A summary of the variations is shown in the table: -

Summary of Variations	£'000
Effect of holding 9.5FTEs vacant within planning & building control, including part year effect of an early retirement	(391)
Underspend within other running expenses resulting from management action in the Division	(182)
Shortfall of building control income	197
Shortfall of income from planning applications	451
Shortfall of income from land charges	9
Total variation	84

Non-Applicable Sections:	Legal, Personnel
Background Documents: (Access via Contact Officer)	2011/12 budget monitoring files within ES/R & R finance section

This page is left intentionally blank

PLANNING BUDGET MONITORING 2011/12

2010/11 Actuals £	PCM	2011/12 Original Budget £	2011/12 Revised Budget £	2011/12 Projected Outturn £	Variation £	Variation Last Reported £	Full Year Effect £
	Planning - Bob McQuillan						
(141,811)	Building Control	(30,630)	(30,630)	(30,630)	0	(4,820)	0
1,208,316	Planning	978,720	953,400	1,146,331	192,931	40,000	0
(237,670)	Land Charges	(274,970)	(274,970)	(274,970)	0	0	0
1,401,259	Renewal	1,370,870	1,470,870	1,362,110	(108,760)	(40,000)	0
2,230,094	Total Controllable	2,043,990	2,118,670	2,202,841	84,171	(4,820)	0
402,436	Total non-controllable	0	0	0	0	0	0
1,354,483	Total excluded recharges	1,240,270	1,240,270	1,240,270	0	0	0
3,987,013	Grand Total	3,284,260	3,358,940	3,443,111	84,171	(4,820)	0

BUILDING CONTROL - 2011/12 FINANCIAL MONITORING

2010/11 Actuals £	BUILDING CONTROL	2011/12 Original Budget £	2011/12 Revised Budget £	2011/12 Projected Outturn £	Variation £	Variation Last Reported £	Full Year Effect £
773,182	Employees	970,430	970,430	812,330	(158,100)	(158,600)	0
0	Premises	0	0	0	0	0	0
18,734	Transport	28,910	28,910	19,910	(9,000)	(11,000)	0
172,430	Supplies and Services	88,880	88,880	59,075	(29,805)	(84,220)	0
0	Third Party Payments	0	0	0	0	0	0
0	Transfer payments	0	0	0	0	0	0
0	Contribution to Reserve	0	0	0	0	0	0
0	Capital financed by revenue	0	0	0	0	0	0
(1,106,157)	Income	(1,118,850)	(1,118,850)	(921,945)	196,905	249,000	0
0	Grant related recharges	0	0	0	0	0	0
(141,811)	Sub total controllable budget	(30,630)	(30,630)	(30,630)	0	(4,820)	0
84,151	FRS17	0	0	0	0	0	0
0	Landlord maintenance	0	0	0	0	0	0
0	Insurance	0	0	0	0	0	0
0	Capital Charges	0	0	0	0	0	0
0	Property Rental Income	0	0	0	0	0	0
84,151	Sub total non controllable budget	0	0	0	0	0	0
168,696	Excluded Recharges	133,910	154,210	154,210	0	0	0
168,696	Sub total excluded recharges	133,910	154,210	154,210	0	0	0
111,036	Grand Total	103,280	123,580	123,580	0	(4,820)	0

Building Control £0k

A shortfall of income of £197k is projected due to the recession and is being offset by savings of £197k from management action to reduce costs, including holding 3.5fte vacant.

PLANNING - 2011/12 FINANCIAL MONITORING

2010/11 Actuals £	PLANNING	2011/12 Original Budget £	2011/12 Revised Budget £	2011/12 Projected Outturn £	Variation £	Variation Last Reported £	Full Year Effect £
1,881,083	Employees	2,026,600	2,001,280	1,811,645	(189,635)	(214,000)	0
4,600	Premises	9,200	9,200	6,050	(3,150)	(4,000)	0
14,884	Transport	20,560	20,560	18,081	(2,479)	(6,000)	0
322,418	Supplies and Services	218,190	218,190	154,695	(63,495)	(29,500)	0
0	Third Party Payments	0	0	0	0	0	0
0	Transfer payments	0	0	0	0	0	0
0	Special Schemes	0	0	0	0	0	0
0	Capital financed by revenue	0	0	0	0	0	0
(1,014,669)	Income	(1,295,830)	(1,295,830)	(844,140)	451,690	293,500	0
0	Grant related recharges	0	0	0	0	0	0
1,208,316	Sub total controllable budget	978,720	953,400	1,146,331	192,931	40,000	0
180,844	FRS17		0	0	0	0	0
0	Landlord maintenance		0	0	0	0	0
0	Insurance		0	0	0	0	0
0	Capital Charges		0	0	0	0	0
0	Property Rental Income		0	0	0	0	0
180,844	Sub total non controllable budget	0	0	0	0	0	0
935,228	Excluded Recharges	917,190	943,190	943,190	0	0	0
935,228	Sub total excluded recharges	917,190	943,190	943,190	0	0	0
2,324,388	Grand Total	1,895,910	1,896,590	2,089,521	192,931	40,000	0

Planning £193k

Income from non-major planning applications seem to be decreasing compared to 2010/11, £243k has been received in the five months to 31st August compared to £305k received for the same period in 2010/11. The income is therefore expected to be at least £355k lower than the budget.

Income received from major applications in the five months to 31 August is £97k compared to £56k received in the same period in 2010/11. Officers have given details of potential income totalling £101k for the remainder of the financial year, which would give total income of £198k against a budget of £300k.

For information, £393k was received for major applications during 2009/10 and £236k for 2010/11.

The budget option relating to the introduction of new fees for pre-application meetings for non-majors is generating the level of income expected and the target of £30k should be achieved.

Management action taken includes holding 6 fte posts vacant and reducing spend on running expenses totalling Cr £256k.

Summary of Planning variations	Variation £'000
Effect of holding 6 FTEs vacant within planning	(179)
Shortfall of income from planning fees	457
Miscellaneous income	(8)
Underspends on transport & supplies & services from Management action within Planning	(77)
Total variation	193

LAND CHARGES - 2011/12 FINANCIAL MONITORING

2010/11 Actuals	LAND CHARGES	2011/12 Original Budget	2011/12 Revised Budget	2011/12 Projected Outturn	Variation	Variation Last Reported	Full Year Effect
£		£	£	£	£	£	£
151,382	Employees	162,630	170,860	161,300	(9,560)	0	0
0	Premises	0	0	0	0	0	0
19	Transport	10	10	40	30	0	0
7,308	Supplies and Services	16,630	8,400	8,400	0	0	0
0	Third Party Payments	0	0	0	0	0	0
0	Transfer payments	0	0	0	0	0	0
0	Special Schemes	0	0	0	0	0	0
0	Capital financed by revenue	0	0	0	0	0	0
(396,379)	Income	(454,240)	(454,240)	(444,710)	9,530	0	0
0	Grant related recharges	0	0	0	0	0	0
(237,670)	Sub total controllable budget	(274,970)	(274,970)	(274,970)	0	0	0
12,815	FRS17		0	0	0	0	0
	Landlord maintenance		0	0	0	0	0
	Insurance		0	0	0	0	0
	Capital Charges		0	0	0	0	0
	Property Rental Income		0	0	0	0	0
12,815	Sub total non controllable budget	0	0	0	0	0	0
280,137	Excluded Recharges	274,970	228,670	228,670	0	0	0
280,137	Sub total excluded recharges	274,970	228,670	228,670	0	0	0
55,282	Grand Total	0	(46,300)	(46,300)	0	0	0

Land Charges £0k

As a result of the Government withdrawing the statutory fee for personal searches in August 2010, the full year effect of the loss of income will be £100k. A request will be submitted to the Executive to draw down part of a contingency which was set aside for the likely event of the withdrawal of this statutory fee which currently has a balance of £162k.

RENEWAL - 2011/12 FINANCIAL MONITORING

2010/11 Actuals £	RENEWAL	2011/12 Original Budget £	2011/12 Revised Budget £	2011/12 Projected Outturn £	Variation £	Variation Last Reported £	Full Year Effect £
1,142,988	Employees	1,144,410	1,144,410	1,100,520	(43,890)	(40,000)	0
0	Premises	0	0	0	0	0	0
3,732	Transport	6,850	6,850	4,330	(2,520)	0	0
306,000	Supplies and Services	220,220	448,700	387,550	(61,150)	0	0
0	Third Party Payments	0	0	0	0	0	0
0	Transfer payments	0	0	0	0	0	0
0	Special Schemes	0	0	0	0	0	0
0	Capital financed by revenue	0	0	0	0	0	0
(51,461)	Income	(610)	(129,090)	(130,290)	(1,200)	0	0
0	Grant related recharges	0	0	0	0	0	0
1,401,259	Sub total controllable budget	1,370,870	1,470,870	1,362,110	(108,760)	(40,000)	0
124,626	FRS17	0	0	0	0	0	0
	Landlord maintenance	0	0	0	0	0	0
	Insurance	0	0	0	0	0	0
	Capital Charges	0	0	0	0	0	0
	Property Rental Income	0	0	0	0	0	0
124,626	Sub total non controllable budget	0	0	0	0	0	0
(29,578)	Excluded Recharges	(85,800)	(85,800)	(85,800)	0	0	0
(29,578)	Sub total excluded recharges	(85,800)	(85,800)	(85,800)	0	0	0
1,496,307	Grand Total	1,285,070	1,385,070	1,276,310	(108,760)	(40,000)	0

Renewal Cr £109k

The £109k underspend on Renewal relates to staffing due to part year effect of early retirement of £44k, and management action to hold spending on the portfolio holder initiatives of £51k and other expenditure budgets of £14k.

This page is left intentionally blank

Report No.
DRR/11/124

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17 November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **PLANNING APPEALS MONITORING REPORT
(APRIL - SEPTEMBER 2011)**

Contact Officer: Tim Bloomfield, Development Control Manager (Planning Appeals and Enforcement)
Tel: 020 8313 4687 Tel No E-mail: tim.bloomfield@bromley.gov.uk

Chief Officer: Chief Planner

Ward: All

1. Reason for report

Following the previous monitoring report to Development Control Committee on 19 April 2011 for the period January – March 2011 this report provides an update for the second and third quarters of 2011.

2. **RECOMMENDATION(S)**

Members note the report

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Quality Environment.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: Recurring cost.
 3. Budget head/performance centre:
 4. Total current budget for this head: £
 5. Source of funding:
-

Staff

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory requirement.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected):
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes.
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 The attached table (Appendix 1) provides a summary of appeals activity in the period 1 April to 30 September 2011. 137 new planning appeals were lodged, compared with 111 in the same quarter in 2010. Over the same period 123 appeal decisions were received of which 70 (57%) were dismissed and 53 (33%) allowed. This generally reflects the national average where approximately one-third of appeals are allowed.
- 3.2 In the period January – September 2011 a total of 210 appeals were received. This represents a projected figure of 280 appeals in 2011, compared with 240 in 2010 and 300 in 2009. This is a reflection of the national downturn in economic activity and a reduction in the number of planning applications.
- 3.3 Bromley has consistently receives more appeals than any other LPA in the country, ranging from 311 in 2004 to 228 in 2010. However, this figure relates only to S78 and Householder appeals and excludes enforcement, advertisements, listed buildings and lawful development certificate appeals. Despite the recession the projected number of appeals in 2011 is only marginally lower than the peak in 2004.
- 3.4 With regard to appeal procedure, the written representation method has remained the most popular method accounting for 54% of all appeal decisions received. The number of ‘fast track’ appeals has increased from approx. 30% in the first quarter of 2011 to 40% although the percentage of appeals dismissed by this method has fallen to 45%.
- 3.5 However, the number of informal hearings has significantly reduced to 5% compared to 10% in 2010. Only one appeal decision received during the quarter was determined by local inquiry (??). This follows an overall trend for a reduction in the number of appeals determined by informal hearing or local inquiry since the Planning Inspectorate adopted a more rigorous approach in applying the relevant criteria as to the most appropriate procedure.
- 3.6 The breakdown by appeal procedure for the second and third quarters of 2011 compared with the same period in 2010 is summarised below:

Procedure	April - September 2011	April - September 2010
‘Fast track’	62 (45%)	41 (37%)
Written Representations	65 (47%)	54 (49%)
Informal Hearing	9 (7%)	15 (14%)
Local Inquiry	1 (1%)	1 (1%)
Total	137	111

- 3.6 A separate report on planning appeal costs in 2011 will be submitted to the next DCC on 12 January 2012.

Non-Applicable Sections	Policy, Legal, Financial and Personnel Implications
Background Documents: (Access via Contact Officer)	

This page is left intentionally blank

This page is left intentionally blank

Report No.
DRR/11/126

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17 November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **ENFORCEMENT MONITORING REPORT
(JULY - SEPTEMBER 2011)**

Contact Officer: Tim Bloomfield, Development Control Manager (Planning Appeals and Enforcement)
Tel: 020 8313 4687 Tel No E-mail: tim.bloomfield@bromley.gov.uk

Chief Officer: Chief Planner

Ward: All

1. Reason for report

Following the previous quarterly monitoring report to Development Control Committee on 19 April 2011 this report provides an update for the second and third quarters of 2011.

2. **RECOMMENDATION(S)**

Members note the report

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Quality Environment.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: Recurring cost.
 3. Budget head/performance centre:
 4. Total current budget for this head: £
 5. Source of funding:
-

Staff

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory requirement.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected):
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes.
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 In the second and third quarters of 2011 the Council received 369 new complaints about alleged breaches of planning control, representing an average of 61 new cases per month. This equates to a projected figure of 738 new cases in 2011. These are summarised in the attached table (Appendix 1). This compares with approximately 800 complaints received in 2010 representing an average of 65 new cases per month.
- 3.2 In terms of enforcement activity enforcement notices were issued in respect of 56 breaches of planning control in the period April to September 2011. The main types of breach were as follows:

Type of Notice	Number of Notices
Building operations	30
Material Change of Use	7
Untidy Site	6
Breach of Condition	7
Planning Contravention Notice	6
Total	56

- 3.3 During the same period enforcement action has been authorised in a further 20 cases and the Council's solicitors have been instructed to issue notices.
- 3.4 The majority of enforcement action is authorised under Delegated Authority and a list of cases where delegated enforcement action has been taken is regularly reported to Plans Sub Committee. In addition a monthly report of notices issued is circulated to all Members .
- 3.5 A wide range of complaints is received but the most frequent relate to building operations (35%), untidy sites (11%), changes of use (10%), commercial activities (9%) and boundary treatment (9%). A substantial number of complaints are received which do not involve breaches of planning control which are not recorded on the planning enforcement monitoring system. These include non-planning issues such as boundary disputes, anti-social behaviour and other civil matters which fall outside the remit of planning control.
- 3.6 In cases where an enforcement notice has become effective and not been complied with the Council may exercise its powers of prosecution. During the second and third quarters of 2011 the Council's solicitors have been instructed to prosecute in 12 cases, as follows:
1. **10 Woodbastwick Road** - unauthorised building works
 2. **43 High Street, Green Street Green** - unauthorised metal roofing
 3. **61 Chislehurst Road, Chislehurst** - unauthorised shop front and air conditioning units
 4. **20 High Street, Bromley** – unauthorised internally illuminated signs above shop and fascia
 5. **82 Manor Way, Beckenham** – unauthorised balcony at rear of second floor dormer and first floor window
 6. **The Annexe, 1 Walnut Road, Orpington** - Untidy site
 7. **Old Hurst Cottage, Pickhurst Green, Bromley** – Breach of Condition – vehicle access
 8. **Rose Cottage, 13 Vincent Square, Biggin Hill** – unauthorised works to listed building

- 9. **53 Queens Mead Road, Bromley** – unauthorised conversion into flats
- 11. **Sydenham Scrap Metal, formerly Burnham Signs, Burnham Way, SE26** - Breach of Conditions
- 12. **The Lodge, King William IV Gardens, SE20** – unauthorised boundary screening

3.7 Direct action has been authorised in the following cases:

- 1. **12 Hillcrest Road, Biggin Hill** – to remove unauthorised swimming pool
- 2. **1A Holbrook Lane, Chislehurst** – to remove unauthorised rooflights
- 3. **3 Filey Close, Biggin Hill** – untidy site

Non-Applicable Sections	Policy, Legal, Financial and Personnel Implications
Background Documents: (Access via Contact Officer)	

ENFORCEMENT STATISTICS 1 JANUARY 2011 TO 31 DECEMBER 2011

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL
No. of Complaints	40	56	66	66	49	63	57	63	66	71			
1st quarter	162												
2nd quarter	169												
3rd quarter	200												
4th quarter	0												
Total complaints	531												
Number of Notices													
Operational Development	5	11	5	5	1	5	8	10	4	2			
Change of Use	1	2	1	0	0	1	2	2	1	1			
S215	0	3	1	0	0	0	0	1	4	1			
Breach of Condition Notice	0	1	3	0	0	2	3	2	0	0			
Planning Contravention Notice	0	3	2	0	0	2	0	3	0	1			
Stop Notice	0	0	0	0	0	0	0	0	0	0			
TOTAL	6	20	12	12	1	10	13	18	9	5	0	0	0
Range of complaints													Percentage
Operational Development	5	24	24	24	22	21	22	20	23	24			185
Untidy Sites (S215)	7	3	15	2	5	7	6	6	6	6			57
Commercial Activity	5	7	5	3	3	6	5	4	7	8			50
Breach of condition	0	5	5	2	2	0	4	6	1	2			25
Adverts	2	1	4	2	2	6	5	1	4	4			29
Boundary treatment	2	3	6	4	4	5	6	2	9	10			47
Plans - not built according to	5	0	11	5	4	4	4	11	7	6			46
Commercial vehicle - parking of	1	0	0	0	1	0	0	0	0	1			3
Change of Use	9	5	6	7	7	9	3	2	5	9			55
Access	0	0	0	0	0	1	0	0	0	0			1
Shop shutters	0	0	1	0	0	0	0	0	0	0			1
Satellite Dishes	0	1	2	0	0	1	0	0	0	0			4
Number of:													
Advert proceedings						1	1	2	3	0			
Prosecutions	4	2	3	7	2	2	3	0	2	0			
Injunctions								0	0	0			
Warrants		1						0		0			

This page is left intentionally blank

Report No.
DRR/11/128

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Key

Title: **DEVELOPING A SUSTAINABLE FRAMEWORK FOR UK AVIATION: SCOPING DOCUMENT**

Contact Officer: Matthew Nunn, Deputy Manager
Tel: 020 8313 4893 E-mail: matthew.nunn@bromley.gov.uk

Chief Officer: Bob McQuillan, Chief Planner

Ward: All wards

1. Reason for report

This report is to inform the Development Control Committee of the recent Government publication '*Developing a sustainable framework for UK Aviation: Scoping Document*'. The aim of the scoping document is to define the debate as the Government develops its long term policy for UK aviation. An initial response has been made to the Government.

2. **RECOMMENDATION**

Members note the report.

Corporate Policy

1. Policy Status: N/A. Government Policy
 2. BBB Priority: Quality Environment.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A.
 3. Budget head/performance centre: Planning Division Budget
 4. Total current budget for this head: £3.3million
 5. Source of funding: N/A
-

Staff

1. Number of staff (current and additional): 1
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Non-statutory - Government guidance.
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

- 3.1 The Government has committed to producing a sustainable framework for UK aviation to replace the existing “*The Future of Air Transport*” White Paper, published in 2003. The Government is doing this in various stages. The first stage is the scoping document; the second stage is the publication of a draft policy for public consultation; the final stage is the adoption of a framework, expected to be in 2013.
- 3.2 The purpose of the scoping document to ‘define the debate’ as the Government develops its long term strategy for UK aviation. The scoping document covers a broad range of issues including the following: an overview of aviation’s key contributions to the economy and its importance to the connectivity of the UK; an overview of the Government’s policies and current work on tackling climate change, including encouraging sustainably growing the aviation sector whilst significantly reducing its overall climate change impacts; an overview of aviation and the local environment, including noise and air quality.
- 3.3 This Council, via the Chairman of this Committee, has responded by letter to the first ‘scoping stage’ of the Government’s formulation of a new framework for UK aviation. The response noted that the development of the Government’s aviation policy is still at a very early stage, and the Scoping Document seeks to define the debate in order to develop a long term policy for UK aviation rather than formulate firm policy proposals at this stage. However, the Council’s response stressed that it is crucial that a balance is struck between recognising the social and economic benefits of aviation, whilst minimising any harmful environmental impacts, including the adverse effects on amenities of local residents affected by airport operations.
- 3.4 The Council’s response acknowledged that London Biggin Hill Airport clearly has a role to play in the local and regional economy. However, it stressed its operation must be subject to environmental considerations, including protecting the Green Belt within which it is located. It was noted that in 1994, this Council entered into a 125 year lease of the airport to Biggin Hill Airport Ltd (BHAL). It further noted that the lease requires BHAL to manage the airport in accordance with certain obligations and controls on the operation and development of the airport. This includes various operational clauses as well as restricting the number of aircraft movements to 125,000 per annum. The Council response emphasised that any future aviation policy cannot override or alter the terms of the lease between this Council and BHAL. A copy of the letter is attached at Appendix A.

4. POLICY IMPLICATIONS

This report is in accordance with the Council’s ‘Building a better Bromley’ Plan.

Non-Applicable Sections:	Financial, Legal and Personnel Implications
Background Documents: (Access via Contact Officer)	Listed above

This page is left intentionally blank



LONDON BOROUGH OF BROMLEY
MEMBERS' ROOM, BROMLEY CIVIC CENTRE,
STOCKWELL CLOSE, BROMLEY BR1 3UH

Aviation Policy Framework
Great Minster House (1/24)
76 Marsham Street
London
SW1P 4DR

20 October 2011

Dear Sirs,

RE: DEVELOPING A SUSTAINABLE FRAMEWORK FOR UK AVIATION: SCOPING DOCUMENT

Thank you for the opportunity to comment on the recently published Aviation Scoping Document which covers a wide variety of issues. The Council of the London Borough of Bromley has an interest in aviation matters as London Biggin Hill Airport falls within its boundaries.

In my capacity as the Chairman of the London Borough of Bromley's Development Control Committee responsible for planning matters, I make the following brief observations.

It is appreciated that the development of this Government's aviation policy is still at a very early stage, and the Scoping Document seeks to define the debate in order to formulate a long term policy for UK aviation. However, it is crucial that a balance is struck between recognising the social and economic benefits of aviation, whilst minimising any harmful environmental impacts, including the adverse effects on amenities of local residents affected by airport operations.

It is acknowledged that London Biggin Hill Airport clearly has a role to play in the local and regional economy. However, its operation must be subject to environmental considerations, including protecting the Green Belt within which it is located. You may be aware that in 1994, this Council entered into a 125 year lease of the airport to Biggin Hill Airport Ltd (BHAL). The lease requires BHAL to manage the airport in accordance with certain obligations and controls on the operation and development of the airport. This includes various operational clauses as well as restricting the number of aircraft movements to 125,000 per annum. This Council would emphasise that any future aviation policy cannot override or alter the terms of the lease between this Council and BHAL.

Yours sincerely,

Councillor Peter Dean
Chairman of the Development Control Committee

This page is left intentionally blank

Report No.
DRR/11/127

London Borough of Bromley

PART 1 - PUBLIC

Decision Maker: **Development Control Committee**

Date: **17th November 2011**

Decision Type: Non-Urgent Non-Executive Non-Key

TITLE: UPDATE: PLANNING LEAFLETS AND INFORMATION FOR THE PUBLIC

Contact Officer: Tim Horsman, Assistant Development Control Manager
Tel: 020 8461 7716 E-mail: tim.horsman@bromley.gov.uk

Chief Officer: Bob McQuillan

Ward: N/A

1. Reason for report

Update on Planning Leaflets following report from DCC September 2011

2. **RECOMMENDATION(S)**

Members are asked to note progress

Corporate Policy

Existing policy:

Financial

1. Estimated cost Included within existing staff workload
 2. Non-recurring cost
 3. Budget head Planning
 4. Total budget for this head £3.3m
-

Staff

1. Number of staff (current and additional) - 2
 2. If from existing staff resources, number of staff hours - 100
-

Legal

1. Non-statutory - Government guidance:
 2. Call-in is not applicable:
-

Customer Impact

Estimated number of users/beneficiaries (current and projected) - All users of planning process

3. COMMENTARY

- 3.1 Following the most recent report to committee in September this report updates the situation with regard to progress on the planning information project.
- 3.2 In accordance with Council objectives, the planning pages of our website is considered to be the primary point of access for customers for all information regarding all local aspects of planning. The planning pages of bromley.gov are understood to account for around 6% of all traffic to the Council's site. National information regarding planning is provided on the government's Planning Portal site (www.planningportal.gov.uk). In light of this the Council's planning webpages are an essential part of the delivery of local information to customers and integral to the delivery of information proposed for the updated planning leaflets, and to improve the Council's aim of avoiding unnecessary contact.
- 3.3 Meetings have taken place between representatives of the Planning Division and the website team and a new draft structure for the planning webpages has been put forward. A mock up of these pages created by the web team is due to be presented to the Planning representatives in the week commencing 7th November. This redesign will take a more customer focused approach centred around topics of enquiry rather than reflecting the internal structure of the department – the new website is designed to provide an improved customer experience in this way cross referencing teams and departments to provide the information needed rather than presenting it in rigid sections.
- 3.5 The information by topic in the leaflets as set out in the attached table will be integrated within the new planning pages in a central information section as well as being accessed via topic areas and through question based links such as “How do we publicise planning applications?”
- 3.6 The table below shows the leaflets which have been updated and copies of these are available in the Members Room, or electronically by request from tim.horsman@bromley.gov.uk. Other leaflets will be made available once prepared and agreed. Some are currently awaiting final approval and may be available before the committee meeting.

Ref	Topic	Brief Description	Status
1-1	Do I Need Planning Permission and Permitted Development (Householder)	Details of information on whether permission may be required	Forthcoming
1-2	Planning Applications for Businesses	Details of whether permission may be required, how to get further advice and support for businesses through planning	Forthcoming
1-3	Pre application enquiries and meetings	Information on arrangements, charges, expected information etc	Forthcoming
1-4	Planning Committee Meetings	Explanation of process and arrangements including layout of meeting and public speaking	Updated

1-5	Your Planning Application	Summary of application process for applicants	Forthcoming
1-6	Planning Reception: Duty Planner Service	LEAFLET DELETED DUE TO OPERATIONAL CHANGES	LEAFLET DELETED DUE TO OPERATIONAL CHANGES
1-7	Planning Service Charges	Charges for maps, copying, etc (not planning application fees)	Forthcoming
1-8	Viewing and Commenting on Planning Applications	Ways to view applications and comment and what are valid topics for objections	Forthcoming
1-9	Site Notices and Publicity	Statutory and non-statutory publicity given to applications by the Council	Forthcoming
1-10	Design and Access Statements	When required and expected content	Forthcoming
1-11	Appealing the Councils Decision	Guide to when you are entitled to appeal and outline of process	Forthcoming
2-1	Advertisements	Guide to advert consent including what is likely to require consent	Forthcoming
2-2	Food and Drink Proposals	Information required for applications, potential issues etc	Forthcoming
2-3	Trees	Taking account of trees in development, contacts and information expected for applications	Updated
2-4	Statutorily Listed Buildings	Taking account of LBs in development, difference with LLBs, contacts and information expected for applications	Updated
2-5	Locally Listed Buildings	Taking account of LBs in development, difference with LLBs, contacts and information expected for applications	Updated

2-6	Conservation Areas	Designation, requirements for applications and contacts	Updated
2-7	Design of Residential Extensions	Guidance for generally acceptable designs reflecting Council policy	Forthcoming
2-8	Shopfronts and Security Shutters	Guidance for acceptable design and styles	Updated
2-9	Crime Prevention	What to take into account for an application, contacts	Updated
2-10	Childcare / Preschool Proposals	Requirements and preferred locations including planning considerations	Updated
2-11	Areas of Special Residential Character	Information about the designation and advice for planning proposals within these areas	Updated
3-1	Telecommunications	Council's powers, further information links including health concerns	Updated
3-2	Countryside Management	Information on what it does and projects	CM Team to provide input
3-3	Boundaries	Relationship to planning application process and disputes	Updated
3-4	Parking of Commercial Vehicles	When this may require permission	Updated
3-5	Personal Searches / Land Charges	How to arrange and what to expect	Land charges to provide input
3-6	Ordnance Survey Extracts	Purchasing, copying and using	Forthcoming
3-7	Accessibility and the Disability Discrimination Act	Information on how this needs to be taken into account for proposals	Forthcoming
3-8	Street Naming and Numbering	When to contact and when required	Updated

3-9	Working From Home	When planning permission may or may not be required	Updated
3-10	Building or Renewing Hardstanding	When pp is required or not	Forthcoming

Non-Applicable Sections:	POLICY, FINANCIAL, LEGAL, and PERSONNEL
Background Documents: (Access via Contact Officer)	None