

Decision Maker: DEVELOPMENT CONTROL COMMITTEE

Date: 17TH November 2011

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

Title: CORE STRATEGY ISSUES DOCUMENT - CONSULTATION RESPONSE

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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,
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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
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Staff

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

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

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