

## 6. Supporting Communities

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### Introduction

This chapter sets out the draft planning policies that help support communities particularly through the provision of social infrastructure, such as schools and community, recreation and leisure facilities. Planning policies supporting communities are intrinsic to delivering the vision and objectives for Local Plan Bromley in 2030 and supporting Bromley's Health and Wellbeing Strategy.

### Health and Wellbeing

The development of town planning in 19<sup>th</sup> Century Britain came out of an understanding of the impact of the environment and development upon human health, leading for example to the provision of sewers and building codes. The Health and Social Care Act 2012 involved significant reform of the NHS, putting Local Government and local communities at the heart of improving health and wellbeing for their populations. Highlighting the need for partnerships and a shared health vision and agenda it proposes that public health be better integrated with areas such as social care, transport, leisure, planning and housing. The Bromley Health and Wellbeing Board is led by the London Borough of Bromley and Bromley Clinical Commissioning Group (CCG) and is the main strategic vehicle to achieve this integration by developing a shared understanding of local needs, through the Joint Strategic Needs Assessment (JSNA) and setting priorities through the Joint Health and Wellbeing Strategy. Bromley's first Health & Wellbeing Strategy (2012 – 2015) set the strategic vision for people to

“Live an independent, healthy and happy life for longer.”

### Social Infrastructure

Community facilities make an essential contribution to the health, wellbeing, development and education of individuals living and working in the Borough. There are substantial health benefits associated with access to community and leisure facilities, including not just better physical health, but also better mental health, through increased social interaction. The National Planning Policy Framework (NPPF) highlights the important role of planning in facilitating social interaction and creating healthy, inclusive communities.

The Equalities Act 2010 introduced a new 'single' equality duty to cover age, disability, gender identity, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The equality duty requires all public bodies to have regard to the need to eliminate discrimination, advance equality of opportunity; and foster good relations between different groups.

The Infrastructure Delivery Plan, which will be continually reviewed, will highlight requirements for additional supporting infrastructure, including schools, open

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space, community, health and leisure services which will assist in ensuring thriving and sustainable places in Bromley over the Local Plan period.

### Community Facilities

#### **Draft Policy - Community Facilities**

The Council will promote the quality of life and the health and wellbeing of those living and working in the Borough and engage with providers and agencies to ensure the provision, enhancement and retention of a wide range of appropriate social infrastructure, including facilities for health and education; recreation, sports and play facilities, places of worship and venues for cultural and social activities, as well as the provision of community safety infrastructure such as police facilities, ambulance and fire stations.

Development which meets an identified need for such facilities will be encouraged to locate to maximise accessibility and will normally be permitted provided that it is accessible to the members of the community it is intended to serve by a full range of transport modes.

Planning permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure.

Additionally, in respect of facilities identified by local communities as having significant value, planning permission for alternative uses will only be considered where it can be demonstrated that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the existing use.

#### **Supporting Text**

The ranges of uses that would be described as Community Facilities and / or Social Infrastructure, is very broad. The London Plan Policy 3.16 identifies the following as social infrastructure but advises that the list is not intended to be exhaustive;

*“health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live”.*

It further expands on the a range of arts, cultural, sporting and entertainment provision (Policy 4.6) with reference to bars, restaurants, performing arts venues, cinemas and nightclubs. This wide definition of community facilities is also reflected in the NPPF which advises that planning policies should plan positively for the provision and use of shared space and community facilities, promoting opportunities for meetings between members of the community and specifically includes local shops and public houses (para 70). Additionally there may be other

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local infrastructure, open spaces or facilities which are distinctive to Bromley borough or particular places within Bromley.

The availability of social infrastructure has implications for the whole population but is particularly relevant in ensuring the delivery of “Lifetime Neighbourhoods”, which are defined as those that:

*“offer everyone the best possible chance of health, well-being, and social, economic and civic engagement, regardless of age. They provide the built environment, social spaces that allow us to pursue our own ambitions for a high quality of life. They do not exclude us as we age, nor as we become frail or disabled” (Lifetime Neighbourhoods DCLG 2011)*

Community facilities often face challenges in finding or retaining sites due to the nature of the activities, the impact on residential amenity and to financial pressures.

The loss of social infrastructure can undermine communities and be detrimental to health and wellbeing and by contributing to social isolation impacts particularly on older, disabled and other vulnerable groups. It also undermines the location options for organisations and providers of services which help to build healthier communities and address health inequalities. Against the backdrop of increasing demands on community services and facilities and the spatial variation of provision, the Council will need to work with agencies and providers to ensure a wide range of accessible community, recreational and leisure facilities to support wellbeing and enhance quality of life.

The policy therefore resists the loss of community facilities unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure. Such a demonstration of need should include consultation with relevant Council departments and third party providers to establish whether any community groups or service providers express a need for the site and are interested in buying or leasing it, as well as a 6 month period of marketing an appropriate viable community use value (supported by a Viability Assessment which will be reviewed at cost to the developers).

### Assets of Community Value

Under the Localism Act (2011), voluntary and community organisations can seek to protect valued facilities by nominating them to be listed as ‘assets of community value’, subject to certain criteria. This could include for example village shops, public houses, community centres or libraries. Once listed as Assets of Community Value (ACV) the local community has a 6 month window to bid to purchase the Land or buildings site, should it be offered for sale. In some cases nominations as ACV’s may only be received once the community become aware of the potential loss through the submission of a planning application (at which stage the sale of the site may have been agreed, subject to planning).

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In respect of assets listed or nominated for listing, applications for planning permission will be required to demonstrate through a 6 month marketing exercise that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the asset in its existing use.

### **Draft Policy - Opportunities for Community Facilities**

The Council will support the maximisation of opportunities for the enhancement or the creation of social infrastructure, to address the needs of existing and future residents of all ages, particularly in renewal areas and more accessible locations such as retail centres and existing retail frontages by:

- i) allowing the temporary use of vacant buildings as community facilities,
- ii) enabling community uses in Town and District secondary frontages, neighbourhood local centres and local shopping parades,
- iii) encouraging the development of community “hubs” providing a range of social infrastructure on accessible existing community sites or in local centres or within new major developments,
- iv) supporting the provision and enhancement of sports and recreational facilities, especially where there are recognised deficiencies or where they present a tool for renewal and regeneration.
- v) encouraging the cultural and leisure use of the public realm,

Proposals will be expected to provide appropriate parking and should not adversely affect highway safety or the amenities of adjoining occupiers. Facilities should ensure that they are easily accessible to all sections of the community, through the principles of inclusive design.

### **Supporting Text**

As the demographics of Borough evolve, as a result, for example of an ageing population or increasing birth rate, social infrastructure should reflect changing pressures to deliver appropriate provision for all residents of the borough.

Opportunities to improve community facilities provision in the borough may present themselves as a result of, for example, the changing nature of local parades and retail centres, through the creative use of existing buildings and open spaces, due to the reorganisation of services or through proposals for new developments.

The locations of facilities should mirror the scale of the catchment of its users, ensuring appropriate accessibility. Where appropriate to the catchment, facilities will be expected to be suitably located in strategic locations such as town centres with good access to public transport. The changing nature of retail shopping presents opportunities for community facilities to populate former retail units complementing the existing shopping function and helping to support the vibrancy of local parades and town centres. Additionally, subject to Local Plan retail policies, temporary community uses, which provide services to the public, can support the vibrancy of high streets or local shopping parades where a shop unit would otherwise lie vacant.

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Exceptions to this town centre first presumption would include facilities which serve smaller catchments, or locations which currently provide facilities to which there are established patterns of movement, or types of facility which are more numerous and therefore spread more widely across the borough.

Where town centre locations are not available or appropriate, other vacant commercial buildings, which are accessible by a range of transport modes, may offer potential for social infrastructure uses, subject to the Local Plan “Working in Bromley” policies.

Numerous existing facilities already support a range of community activities. Such a “community hub” approach offers potential to assist the long term sustainability of facilities. The expansion of existing facilities into hubs can provide opportunities for enhanced provision, however, whilst this policy seeks to encourage co-location of services, proposals for relocation will be expected to avoid unduly disadvantaging existing users, since poor access impacts disproportionately on older people and people with disabilities and can contribute to social isolation, diminishing health and wellbeing.

The value that sport and physical activity can play in improving people’s health and quality of life is widely recognised along with its role in enhancing communities, supporting educational opportunities, encouraging inclusion and engaging young people. Pro-Active Bromley is a strategic, independent alliance of partners, including Bromley Council. The Pro-Active Bromley Strategy Framework (2011–2016) seeks to sustain and increase participation in sport and physical activity in Bromley and support the development of accessible sports and leisure facilities in the Borough to improve the quality of provision and widen opportunities to participate in sport and physical activity

“Cultural Metropolis: The Mayor’s Cultural Strategy 2012 and Beyond” promotes high-quality urban design and an enhanced public realm, recognising that cultural organisations often have a key role to play in shaping strategies, informing planning processes and engaging on individual projects.

Developments should ensure that the environment does not lead to discrimination under the Equalities Act 2010 and should enable full and effective participation and inclusion.

It will be important that the impact of facilities on local amenity in respect of noise, hours of operation, highway safety or other environmental impacts are appropriately mitigated, for example through planning conditions or obligations, such as a travel plan.

### **Draft Policy - Social Infrastructure in New Developments**

New developments will be expected to provide social infrastructure appropriate to the nature and scale of the proposal, such as open spaces designed for imaginative play, on site provision of community facilities and / or contributions to offsite facilities. Developments of significant scale will create their own environment and therefore should incorporate within their design, public realm and

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/ or community facilities, which create a sense of place, particularly in Renewal Areas and areas of acknowledged deficiency.

### Supporting Text

The NPPF advises that where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

Development proposals will be expected contribute to the reasonable costs of new services and infrastructure made necessary by their development proposals through the use of planning obligations (and/or any replacement of planning obligations, such as the community infrastructure levy) and to identify, plan for and, where necessary, complete necessary social infrastructure prior to occupation. It is important, especially in areas of significant new homes or areas of deficiency, to ensure that the provision of community facilities to match the projected population growth, and reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all.

New development should also make provision where appropriate for wildlife as well as play and recreation areas in line with the Mayoral Supplementary Planning Guidance "Play and Informal Recreation"(2012).

## Health and Wellbeing

### Draft Policy - Health & Wellbeing

The Council will work proactively with relevant health professionals to improve the physical and mental health of the Borough's residents and reduce health inequalities by taking account of, and supporting local strategies for health and wellbeing and by delivering quality, healthy environments and accessible health facilities to meet the needs of the community, by

- i) requiring applications to maximise opportunities to support and enhance health and wellbeing, encouraging physical activity, providing Lifetime Homes, ensuring appropriate access to open space, particularly in areas of deficiency, and optimising health benefits throughout scheme design.
- ii) allowing extensions to existing facilities and permitting new or improved health facilities, provided that they are easily accessible by public transport or are located within existing shopping centres or local parades, unless there are demonstrably negative local impacts which substantially outweigh the need, which cannot be addressed through planning conditions or obligations.

Health facilities should be designed to ensure ease of access by all members of the community.

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The World Health Organisation defines health as *“a state of social, physical and mental wellbeing and not merely the absence of disease.”*

The Health and Social Care Act 2012 focuses on health in this wider, holistic way with emphasis is on the prevention of illness rather than just the treatment of disease, and a specific leadership role for local government with the transfer of a range of public health responsibilities to Councils including, tackling health inequalities, health protection and obesity.

Local Health and Wellbeing Boards have been established throughout the country. The Bromley Health and Wellbeing Board’s first strategy 2012 – 15 acknowledges that the changes present an opportunity for public health to be better integrated with areas such as social care, transport, leisure, planning and housing and outlines the top priorities for improving health and wellbeing of people living in the Borough on the basis of the Joint Strategic Needs Assessment (JSNA), which is the professional analysis of local health issues.

### The Wider Determinants of Health

Health is at least partly linked to the way we live our lives. The nature of the environments in which we live, work and relax affect both our physical and mental health. It is recognised that beyond fixed age, sex and hereditary factors there are “wider determinants of health”, including social, economic and environmental factors which are important for understanding health inequalities. The Marmot Review “Fair Society Healthy Lives” (2010) makes a clear recommendation that planning, transport, housing, environmental and health policies should be integrated to address the social determinants of health. The Bromley Health and Wellbeing Strategy (2012 – 2015) identifies a number of priorities, including, diabetes, high blood pressure (hypertension), obesity, and mental health specifically in children and young adults and depression and anxiety across the age spectrum which are influenced by the individuals environment . It also flags a range of factors including, housing, green space and employment and access to education, leisure and transport which it indicates the Council will target in order to protect and improve the population’s health. These aims reflect the Local Plan vision for high quality living, working and natural environments to ensure that everyone enjoys a good quality of life, living healthy, full, independent and rewarding lives.

Healthier people tend to be happier, tend to play an active role and contribute to society and the economy through their families, local communities and workplaces. Conversely, poor physical and / or mental health and wellbeing puts a strain on individuals, the NHS, the economy and society.

The NHS Healthy Urban Development Unit has produced a check list of issues to deliver healthy sustainable communities (Watch Out for Health) which assists in the assessment of development proposals.

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### Health Facilities

The Council recognises the benefits of providing a range of health care services close to the communities they serve, including doctors & dental surgeries, chiropractors, osteopaths, mental health and other specific health facilities conventional or complementary to meet the needs of the population generally and those of particular vulnerable groups. Practices can sometimes be accommodated within residential properties without having a significant impact on the amenity of the surrounding residential area.

Modern General Practices support a wider range of services and many existing premises, often in converted residential properties, are unsuitable for this expanded function. Town centres and local shopping parades are likely to provide the most sustainable opportunities for new facilities, where the impact on residential amenity is minimised and there is good access by public transport.

Hospitals and other health facilities within the Borough may also require modernisation, reorganisation or expansion during the plan period. The Council will liaise with the relevant health organisations to support and enable development and improvement of appropriate health care provision.

### **Education**

#### **Draft Policy – Education**

The Council is committed to choice in education for parents and young people and will work, in partnership with agencies and providers, to ensure the provision of an appropriate range of educational facilities to cater for lifelong learning across the spectrum from early years to further and higher education, and including specialist provision. It will achieve this by

- (i) assessing the need for the range of education infrastructure over the plan period and allocating sites accordingly,
- (ii) defining land with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, as “Education Land” and safeguarding these sites for education purposes for the period of the plan. Whilst Education Land and buildings may also perform dual functions for wider community use, the redevelopment of education land for alternative uses will not normally be permitted,
- (iii) permitting extensions to existing schools which seek to address local need, subject to Local Plan open space and conservation policies, unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. Proposals for school extensions on land adjacent to Education Land will also be considered favourably.

In all cases new development should be sensitively designed to minimise the footprint of buildings and the impact on open space, particularly playing fields, as

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well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure.

### Supporting Text

The Academies Act (2012) changed the landscape for educational provision and encourages the establishment of new Free Schools. The NPPF advises that local authorities should “give great weight to the need to create, expand or alter schools”.

All sites with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, will be defined as “Education Land” and protected for education purposes for the period of the plan. This includes any future sites where new educational provision (excluding non-purpose built early years provision) is established on a permanent basis. The policy will cover all buildings and land within the boundaries of the facility, including, educational and sports facilities, open space, ancillary buildings, car parking areas and access routes within the school boundaries and under the schools control. The designation also includes school playing fields, under the control of the school but not open space in other ownership to which schools have access. The only exceptions to this designation would be land and buildings in use as Free Schools for the temporary period of a year, in response to the changes to the General Development Order Permitted Development. Should permanent permission be subsequently permitted they will be considered to be “Education Land”.

In circumstances where alternative, more appropriate, sites are found for a school in converted residential or office buildings, draft Supporting Communities policy (based on UDP Policy C1) would allow the release of the original site. In such circumstances the “Education Land” policy would no longer be applicable to the original site.

London Plan Policy 3.18 D) advises, in respect of new schools, that they “*should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school which cannot be addressed through the appropriate use of planning conditions or obligations*”. Given Bromley’s preference to encourage the extension of existing schools in the first instance, it is appropriate to apply this standard to extensions to schools.

The NPPF advises that “Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.” It is therefore important that opportunities to address the pressure for education provision are not refused on grounds where there are potential solutions to mitigate adverse impacts of the development, through planning conditions or obligations, (e.g. travel plans, highways measured, staggered school hours, landscaping). Where sites are constrained, opportunities to enhance existing facilities by expanding onto adjacent sites will be supported, subject to the policy. Given the ability of schools to be established on sites without their own playing fields it will be

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important that open spaces indicated to provide this function are protected, since patterns of physical activity established in childhood can be a key determinant of adult activity levels and therefore influence physical health.

### **Draft Policy - Educational Facilities**

The Council will support proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure.

Where new sites are required proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations, and subject to

- i) open space and conservation policies
- ii) the need for the provision locally,
- iii) highway safety and
- iv) the accessibility of the site by means of transport other than the car.

Particular weight will be attached for proposals involving the relocation of a Free School, which has operated from a site temporarily for a year, to a more suitable location.

Where Free Schools have operated from buildings for a year under Permitted Development (Class K), and, having been unable to secure a more appropriate location, are required to seek planning permission to remain permanently, applications for planning permission, will be supported subject to compliance with the limited requirements under “The Town and Country Planning (General Development) (Amendment) (England) Order 2013 Class C”, which enables permanent changes of use.

In all cases new buildings should be sensitively designed to minimise the loss of open space and the impact of development, seeking to secure as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure.

Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.

### **Supporting Text**

Whilst acknowledging the freedoms of Academy and Free schools, applicants will be encouraged to

- first consider potential to co locate on existing education sites.
- work with the Council to address the differing patterns of need across the Borough.

The London Plan notes in Policy 3.16E that where a social infrastructure facility is no longer needed, boroughs should take reasonable steps to identify alternative

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community uses where the needs have been identified. Providers should look to explore opportunities presented by redundant social infrastructure when considering locations and demonstrate that investigations have been made when submitting applications for new educational sites.

There will be circumstances where sites unrelated to existing educational facilities or community facilities are proposed by Free School providers. As highlighted above it is important that opportunities to address the pressure for education provision are not refused on grounds where there are potential solutions to mitigate adverse impacts of the development, through planning conditions or obligations, (e.g. travel plans, highways measured, staggered school hours, landscaping)

Free schools may operate for their first academic year from buildings with a range of previous uses under permitted development rights [The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013 "Class K]. Should the Free School be unable or unwilling to relocate planning permission will be required to remain on that site. Where there is no potential to relocate to a more appropriate site it will be important to ensure the on-going education of children at the Free School. In such instances it would be appropriate to consider the continued use of the temporary site on a permanent basis against the limited requirements of Class C prior notification. The Class C prior notification procedure enables the permanent change of use to a school from a range of previous uses (but not including the temporary use as a Free School). The prior notification criteria are;

- (i) transport and highways impacts of the development;
- (ii) noise impacts of the development; and
- (iii) contamination risks on the site.

Where a proposed new education facility lies sufficiently close to an existing educational facility, or other community facility to enable the dual use of facilities, co-operation between providers to produce co-location of services and multi-use facilities will be encouraged in order to maximise land use, reduce costs and develop the educational offer, in line with the London Plan (Policy 3.18 F).

Educational buildings have considerable potential to contribute to the provision of community facilities. Many schools already allow outside organisations to make use of their sports facilities and grounds. The Council wishes to encourage schools and other educational establishments to maximise the contribution their buildings and grounds can make to the local community.

### Public Houses

#### **Draft Policy - Public House**

The loss of public houses will be resisted by the Council except where :

- i) there is an alternative public house within a 500 metre walking distance of the site and, if the public house is located within a local parade or town

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centre, the diverse offer of that parade or town centre is not significantly affected by the loss, and,

ii) where it can be demonstrated that the business is no longer financially viable as a public house, including the submission of evidence of active marketing as a pub for a substantial period of time,

Where the above criteria are met any change of use must be sympathetic to the design, character and heritage value original building if it is considered to be a positive contribution to local character.

### Supporting Text

The National Planning Policy Framework (NPPF) indicates that planning policies and decisions should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each. Many public houses attract adults across the age spectrum.

The NPPF specifically identifies pubs as community facilities and recognises their contribution to enhancing the sustainability of communities and residential environments; it requires local authorities to plan positively for such facilities.

Public Houses can provide communities with a range of benefits, performing not only social but also cultural and economic functions and contributing to the identity of local places. The loss of public houses in the borough is a cause for concern, since 2000 at least 15 pubs have been lost across the borough to alternative uses, most commonly restaurant and residential uses.

In line with this national guidance the Council seeks to prevent the unnecessary loss of public houses unless alternative facilities are locally available and there is no adverse effect on local commercial centres or parades and it can be demonstrated that the use as a Public House is no longer financially viable. This would involve demonstrating evidence of 18 months' suitable marketing activity and proof that the public house is no longer financially viable through the submission of trading accounts, or other similar financial evidence, whilst the pub was operating as a full time business. A formal validation of the evidence will be undertaken by the Council, at the applicant's cost.

Redundant pubs will also be required to comply with Policy C1 and hence for the last 6 months of marketing there should be consultation with relevant Council departments and third party providers to establish whether any community groups or service providers have expressed both a need for the site and are interested in buying or leasing it.

For communities wishing to protect a public house (or other community facilities) powers under Localism Act allow communities to nominate pubs and list them as Assets of Community Value.

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Public house buildings may be important due to their heritage value and have particular architectural characteristics and / or be important as local landmarks; hence the loss of historic pub buildings may be harmful to the character of an area. Many public houses sit within Conservation Areas and a number are locally or Statutory Listed buildings. In such circumstances appropriate attention should be paid to policies that address heritage, conservation and character. In any event potential developers are reminded the need for planning approvals prior to demolition taking place.

### Allotments and Leisure Gardens

#### **Draft Policy - Allotments and Leisure Gardens**

The Council will explore opportunities for allotments and safeguard existing land used as allotments. Development of allotment sites will only be considered where appropriate re-provision is made in accessible locations.

In areas deficient in open space, any development enabled by replacement allotment provision elsewhere, will also be expected to retain an element of open space for public use within the redevelopment.

#### **Supporting Text**

Allotment gardens present opportunities for outdoor activity and healthy eating. In much of the Borough there are long waiting lists for a plot.

The approval of the Secretary of State is required for the disposal or re-use of redundant statutory allotments and whilst vacant allotment sites have in the past been rationalised to provide enhanced allotment plots and benefits to the local community in terms of open space and housing the London Plan (Policy 7.22) which encourages Land for Food, advises that existing allotments should be protected and suggests that Boroughs should identify other potential spaces that could be used for commercial food production or for community gardening, including for allotments and orchards.

### Burial Space

#### **Draft Policy - Burial Space**

The Council will safeguard existing burial space and explore opportunities for further sites should pressure for places increase over the plan period.

There are eight cemeteries in Bromley, six of which are owned by the Council. There is capacity in the Council's cemeteries at Biggin Hill and Cray Valley for up to 20 years or so and there is substantial capacity at the private Kemnal Park Cemetery and Memorial Gardens. It is difficult to predict how demand for internments and cremations may change over time but within the Borough there is provision available for people of all faiths and none.

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The London Plan advises that Boroughs should ensure provision is made for London's burial needs, including the needs of those groups for whom burial is the only option. Provision should be based on the principle of proximity to local communities and reflect the different requirements for types of provision.

Existing cemeteries are spread across the Borough, however, given the pressure for land for development, any significant new proposals for burial sites would be likely to be confined to land with Metropolitan Open Land or Green Belt designations. Cemeteries are an appropriate use in the Green Belt and the NPPF advises that new buildings in the Green Belt are not inappropriate where they provide appropriate facilities for cemeteries, as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.