

**Bromley's Local Plan
Potential Site Allocations, Limited Revised & New Draft Policies &
Designations.**

Proposed Consultation – Beginning of September to 16th October 2015

To avoid starting consultation in the main summer holiday period it is suggested that consultation commences at the beginning of September and provides six full weeks for residents, businesses, partner agencies and the wider community to be fully involved in the process.

The format and layout of the document will be unified once incorporated into the specialist consultation software, with space for comments on each section. It will then be available via the Council's website, consultation portal and in local libraries.

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Appendices (to final document)

- Extracts from the London Plan 2015 where needed
- Glossary

Additional Document A - Sites of Importance for Nature Conservation (SINCs)

Additional Document B - Site Assessments

How to Give Your Views

The Draft Allocations, Further Policies and Designations Document is available for comment from

Your views are sought on whether you agree with the draft allocations and limited number of related key draft policies set out in the document and their ability to contribute to achieving the vision, objectives and spatial strategy for the Borough.

The document is designed for you to be able to comment online on each section. You may comment on as little, or as much of the document as you wish.

Respond Online:

If you are able to access the Internet, you will find our consultation portal is the easiest and quickest way to tell us what you think.

Online Consultation Portal:

<http://bromley-consult.limehouse.co.uk/portal/lpdpd/lpdpc>

If you have not already used the Portal, we encourage you to do so. It is a very simple process and once registered you will automatically be informed when we publish other planning consultation documents.

Other Ways to Comment:

While the consultation is designed for on-line responses, the Council wishes to ensure that everyone has the opportunity to respond. Therefore there are printed copies of this document available to be viewed in all Bromley libraries, the Cotmandene and Mottingham Community and Learning Shops, at Bromley Civic Centre and Community House. (see below for addresses). There is a comments response form available when viewing the document which can be completed.

If you, or someone you know needs the document in a particular language or format, please contact us.

If you are not using the Portal, please email or send your comments to us using the following details:

Email: ldf@bromley.gov.uk

Postal address:

Planning Strategy Team
London Borough of Bromley
Civic Centre
Stockwell Close
Bromley
BR1 3UH

Phone: 020 8313 4730

Please ensure your comments reach us by

This isn't the only opportunity to be involved in the development of the Local Plan but it is a key stage and your views are important.

Next Steps

The responses to this document will be reported to the Council's Development Control Committee and Executive and help inform the preparation of the 'Draft Local Plan'.

Civic Centre
Stockwell Close
Bromley
BR1 3UH

Open 8:30am – 5pm Monday – Friday

Cotmandene Community Resource Centre
64 Cotmandene Crescent
St Paul's Cray
Orpington
BR5 2RG

9.30am to 1pm, 2pm to 4pm Monday – Thursday.

Closed all day Friday.



Mottingham Community and Learning Shop

1-2 Cranley Parade
Beaconfield Road
Mottingham
SE9 4DZ

Mondays – closed. Tuesday to Friday 9:30am - 1pm and 2 - 4pm

All responses (online, emails and letters) must be received by 5.00pm

2015.

Please note that all responses will be made available for public inspection.

Introduction

This document forms a key stage in the development of Bromley's Local Plan which together with the London Plan (March 2015) will form the Development Plan for the Borough.

The Local Plan will set out the vision and objectives to 2031 and the planning policies to support their delivery. When finalised it will also include a policies map showing designations and site allocations, and incorporate an Infrastructure Delivery Plan to support the delivery of the vision and objectives.

Purpose of this consultation document

This document provides another opportunity for local residents, businesses, partner agencies and the wider community to be involved in the plan-making process.

It builds on the earlier public consultation work undertaken by the Council in preparing the Local Plan, in particular, the 'Options and Preferred Strategy' document in Spring 2013, and the Draft Policies and Designations Document in 2014 as well as the ongoing engagement with the community, partner agencies and other local authorities in line with Council's adopted Statement of Community Involvement and its Duty to Co-operate under the Localism Act 2011.

The Draft Policies and Designations document in 2014 included a 'Call for Sites' inviting details of sites to be considered for potential inclusion as a 'Site Allocation' within the draft Local Plan and how they could contribute to the vision and objectives for the Borough.

This document invites comments on the sites identified as Draft Site Allocations. It also includes a limited number of new and revised policies, and designations which provide the context for the draft site allocations, and the requirement of the Local Plan to be in 'general conformity' with the London Plan.

Structure of the Document

After this introductory chapter, the ***Vision and Objectives for the borough*** are set out, as included in the 2014 Draft Policies and Designations document for ease of reference.

This is followed by the ***Strategic Context*** which briefly sets out the key economic and social trends, the national and London context and the challenges and opportunities for the Borough. It then presents the ***Planning Strategy*** which incorporates the 2014 Spatial Strategy for the borough, and sets out the approach to delivering the vision and objectives for the borough as a whole, and in particular the role of the Draft Site Allocations, while ensuring conformity with the National Planning Policy Framework (2012) and the London Plan (2015).

The **thematic chapter headings** from earlier Local Plan consultations are used to structure the proposed draft site allocations, as well as a limited number of new and

revised draft policies and draft designations for ease of reference. However, not all themes have Proposed Draft Site Allocations and therefore aren't included in the document. The table below summarises the position.

Summary: Draft Allocations, Policies and Designations by Theme

Theme	Proposed Draft Site Allocations	New/Revised Draft Policies	New/revised Draft Designations
Living in Bromley	<i>Housing and Mixed use Sites</i>	<i>Housing Supply</i>	
Supporting Communities	<i>Education Sites</i>		<i>Education Sites</i>
Getting Around		<i>Parking Standards Safeguarding land for transport investment</i>	<i>Areas for Parking standards</i>
Valued Environments	<i>n/a</i>	<i>Areas of Special Residential Character</i>	<i>Areas of Special Residential Character Sites of Importance for Nature Conservation</i>
Working in Bromley		<i>Key Office Clusters</i>	<i>Key Office Clusters, Locally Significant Industrial Locations,</i>
		<i>Biggin Hill SOLDC, East of South Camp, Terminal Area</i>	<i>Biggin Hill SOLDC</i>
		<i>Crystal Palace SOLDC</i>	<i>Crystal Palace SOLDC</i>
Environmental Challenges	<i>n/a</i>	<i>n/a</i>	<i>n/a</i>

Each thematic chapter sets out the context, methodology and evidence base underpinning the proposals. More detailed information is available in background papers.

Making your views known

The focus of the consultation is the five thematic chapters; however, comments can be made on the vision, objectives and spatial strategy which were part of the 2014 Draft Policies and Designations consultation document.

The responses to this document will be reported together with the responses from the previous consultation to the Council's Development Control Committee and its Executive. In light of the responses, the changing national and London landscape, and any update to the evidence base the intention is to prepare the Draft Local Plan

for consultation. This will in due course include a formal consultation under Regulation 19 of the Town and Country Planning Regulations 2012.

Relationship with the 2014 Draft Policies and Designations Document and the Mayor's Further Alterations to the London Plan.

Last year the Council consulted on its 'Draft Policies and Designations Consultation Document' (DP&D) focusing on development management policies and designations taking forward the response to the 'Draft Options and Preferred Strategy' document (2013). The DP&D included a 'call for sites' inviting the submission via a proforma of sites to be considered as Draft Site Allocations in the Local Plan to support the delivery of the vision and objectives.

At the same time as the Council consulted on its DP&D, the Mayor of London published his Draft Further Alterations to the London Plan for consultation. As the Council's Local Plan is required to be in 'general conformity' with the London Plan, changes have to be considered for their implications for the emerging borough plan.

Following an Examination in Public and Inspector's report (*), the Mayor published the revised London Plan (March 2015) which has several key changes which are reflected in the Council's drafting of this document. In particular:

- The increase in the minimum housing figure for Bromley of 641 houses per annum for 2015/2025
- The importance of identifying // sites to optimise housing, including town centres, poorer quality commercial space,
- The revised population projections, and identification of pressures, for instance, for primary and secondary school places.
- Recognition that in parts of outer London a more generous approach to residential parking standards may be appropriate.
- Designation of Bromley Town Centre as an Opportunity Area
- The identification of Crystal Palace as a potential Strategic Outer London Development Centre

In addition to contributing to the revision of the Local Plan, the Council has continued to take into account the London Plan's evidence base to update its evidence base to support the preparation of the Local Plan, engage with local communities and to work with other local authorities, in particular adjoining boroughs and district councils, and the Greater London Authority and partner agencies to meet its Duty to Co-operate.

Bromley Town Centre Area Action Plan

The Council adopted the Bromley Town Centre Area Action at the end of 2010 and this will continue as adopted policy and a Development Plan Document as part of the Bromley 'Local Plan' together with the Borough-wide Local Plan.

The 2015 London Plan designated Bromley Town Centre as an 'Opportunity Area' and the Council will work with the Greater London Authority to optimise the contribution that the Town Centre can contribute to the borough's Local Plan vision and objectives, and the London Plan Policy () for Opportunity Areas. It is proposed that following the adoption of the Bromley Borough-wide Local Plan that the Bromley Town Centre Area Action Plan (BTCAAP) will be reviewed consistent with the Opportunity Area provisions in the London Plan. Unless specifically referred to, the allocations in the BTCAAP will not be altered by the Borough-wide Local Plan.

Strategic Approach

The planning strategy is set out in chapter x demonstrating the Council's approach to delivering its vision and objectives for the borough, while being in conformity with the London Plan and National Planning Policy Framework. The 'golden thread' through the NPPF, London Plan and the emerging Local Plan is balancing the economic environmental and social well-being of the Borough.

Site Allocations will be included in the Draft Local Plan as a key element of its delivery. Therefore the draft site allocations cover housing and mixed use sites, gypsy and traveller sites, education and employment sites.

The London Plan was revised in March 2015, and as outlined earlier includes several changes impacting on the development of Bromley's Local Plan. This has contributed to several new and revised policies in this document. In addition, the liberalisation of permitted development rights, in particular the change of use of offices to residential has led to the creation of draft key office clusters.

Economic growth is focused on the three areas of Bromley Town Centre, Biggin Hill Strategic Outer London Development Centre, and the Cray Business Corridor.

Housing growth is focused in town centres, and areas of good accessibility with smaller infill development likely across different parts of the borough.

Social infrastructure is distributed across the borough to serve local communities.

Infrastructure Requirements

Although in general the recommended sites for inclusion in the Draft Local Plan, for new development are in areas already well served by infrastructure provision, it is important the specific site allocations in the Draft Local Plan are supported by the necessary infrastructure to ensure sustainable development takes place. Some of this will be site specific and will be identified within specific allocations, but, in other cases, growth in general will need to be supported by additional physical, social and green infrastructure to cater for the additional population and provide services and facilities.

The Council prepared an early draft of an Infrastructure Delivery Plan (2013) which is currently being updated. This will be included as part of the Draft Local Plan and an Infrastructure Plan will be regularly reviewed.

The Council is currently preparing a borough Community Infrastructure Levy in accordance with the 2011 Localism Act and the Community Infrastructure Regulations 2010 (as amended). The levels of any proposed CIL charged will be separately consulted on and do not form part of the Local Plan process.

DRAFT

Vision and Objectives

Vision

Bromley 2031

Introduction

This section restates the Vision and Objectives for the Borough set out in the Draft Policies and Designations document 2014 for ease of reference.

“Bromley is known for the high quality of its living, working and natural environments. The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives.

Bromley values its distinctive neighbourhoods, ranging from the rural to suburban and urban. Neighbourhoods provide a choice of good quality homes, jobs and a range of shops and services appropriate to the different town, district and local centres. Bromley Town Centre is recognised for its cultural and leisure facilities and vibrant high quality shopping experience.

The protection and enhancement of conservation areas and historic assets such as Downe House, Crystal Palace and Biggin Hill, along with high quality new development have contributed to civic pride and wellbeing.

The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley’s special character and the health and wellbeing of local residents and visitors alike.

Bromley has high levels of educational attainment, whilst strong and diverse businesses are able to invest to support a thriving economy.”

Open Space and the Natural Environment

The value of natural spaces, whether private gardens, rivers, lakes or Green Belt, is recognised and afforded a high priority. Land, air and water environments are sustainably managed, ensuring that the wide range of different open spaces and habitats, with their distinctive animal and plant life, are well managed and accessible. As well as helping conserve and enhance biodiversity, Bromley’s natural environment supports the wellbeing of its communities, with open spaces and trees providing healthy environments and space for leisure and sport. Opportunities are taken to increase natural habitats, especially in areas with a deficiency, linking them together and improving their quality and accessibility.

1

Objectives:

- Manage, protect and enhance natural environments.
- Encourage the protection and enhancement of biodiversity.
- Ensure that the Green Belt continues to fulfil its functions.
- Improve the quality of open space and encourage provision in areas of deficiency and in any new development.

Health and Wellbeing

The quality of life in Bromley has improved in all its neighbourhoods with all residents enjoying better health and wellbeing. Areas with a concentration of social and/or environmental difficulties are being improved. Communities are served by local shopping parades, education, healthcare, leisure, community and cultural facilities, including libraries and places of worship. New facilities are encouraged in accessible locations to deliver flexible and efficient community hubs. The environment is designed to maximise accessibility for people with disabilities. Residents are helped to improve their own places and local environments for the benefit of all the community. There is less crime and anti-social behaviour.

2

Objectives:

- Produce healthier environments and infrastructure to support people in living fuller, longer, healthier, more sustainable lives.
- Co-ordinate the improvement of Bromley's designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments.
- Neighbourhoods offer good quality homes and an accessible range of shops and services, appropriate to the roles of the different centres - from town centres to local neighbourhood centres and parades.
- Ensure new community facilities are appropriately located to provide accessible, effective and modern services, and resist the net loss of facilities.

Homes

A range of decent homes of different types and sizes are available and housing supply is tailored to local needs. Any new housing complements and respects the character of neighbourhood in which it is located, paying particular attention to the density of development, parking requirements and improving the choice of accommodation available.

3

Objectives:

- Ensure there is an appropriate supply of homes to meet the varied needs of the local population, which responds to changing demographics, in particular as the population ages.
- Ensure new residential development, extensions and conversions complement and respect local character.
- Ensure new homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure.

Business, employment and the local economy

Bromley is a prosperous, thriving and skilled borough where businesses choose to locate. New businesses start up and grow using local skills, supply chains and investment and Business Areas offer high quality flexible accommodation. There is an improved range of employment opportunities for residents and education and skills levels have been raised throughout the Borough.

4

Objectives:

- Business Areas adapt successfully to the changing needs of modern industry and commerce.
- Ensure there is an appropriate supply of commercial land and a range of flexible quality business premises across the borough.
- Ensure businesses contribute to a high quality, sustainable environment, through their premises development and locational decisions.
- Support the appropriate provision of facilities to deliver high quality education and training.
- Support the Strategic Outer London Development Centre (SOLDC) designation at Biggin Hill to enhance the areas employment and business opportunities, whilst having regard to the accessibility and environmental constraints.
- Support the digital economy and the infrastructure required for it and modern business, such as high speed fibre connections.

Town centres provide a range of goods and services and are safe, clean and welcoming for all. Bromley Town Centre is a competitive Metropolitan Town Centre, complementing others in the region and attracting a wide range of visitors to its shopping, cinema, theatre and restaurant

areas. Orpington functions as a strong and vibrant major centre, offering a good range of shopping, leisure and public amenities. These centres, together with the district, local and neighbourhood centres, provide accessible shops, services and facilities for residents and wider communities across the Borough.

5

Objectives:

- Ensure vitality of Bromley Town Centre, delivering the aims of the Area Action Plan.
- Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes.
- Support the continued improvement of Orpington and other district and local centres.
- Encourage safe town centres and a prosperous evening economy.
- Maintain and improve neighbourhood centres and parades across the Borough to ensure locally accessible facilities.

Design and the public realm

New development of all kinds is well designed, safe, energy efficient and complements its surroundings, respecting the existing scale and layout. Private or public open space, and appropriate car parking are key considerations. Public art and street furniture make places more attractive and comfortable for users. Our roads and streets are clean but uncluttered, with street trees and verges improving their appearance.

6

Objective:

- Ensure development attains high quality design standards.
- Ensure development includes appropriate well planned private or public open space.
- Ensure public areas are well designed, safe and accessible.

Built heritage

Our man-made heritage assets; areas of distinctive character, listed buildings, conservation areas and monuments, are protected and enhanced. No historic features are considered to be “at risk” and underused heritage assets are brought back into productive uses. The Borough’s rich heritage is widely enjoyed.

7

Objective:

- Continue to protect locally and nationally significant heritage assets.
- Ensure development complements and improves the setting of heritage assets.
- Encourage greater accessibility of heritage assets.
- Encourage a proactive approach to the protection and improvement of heritage assets to contribute to strategic, local planning and economic objectives.

Transport

Moving around the borough is easier due to reduced road congestion and improved public transport networks. Commuting traffic has reduced as more people share car journeys and choose alternative ways of working and travelling. Reduced road traffic results in less pollution and greenhouse gases from transportation. Any new development should where appropriate include electric vehicle charging points and there are more car clubs, increasing travel choices for local people. Walking and cycling to work, school and for leisure, has increased and the road

environment is safer for vulnerable users. Public transport is more accessible to those with mobility problems and is safer and more reliable.

8

Objectives:

- Reduce road congestion at peak times through better management of the network and encouraging patterns of development that reduce the need to travel and by improving road junctions and layouts whenever and wherever possible.
- Support improvements to public transport links, including associated parking, and facilitate environments that encourage walking and cycling.
- Locate major developments where they can maximise the use of public transport.
- Ensure new developments include electric charging points, cycling facilities such as dedicated cycle routes, and car clubs where appropriate, increasing choice for local people
- Ensure streets are safe, accessible and uncluttered, improve road safety and reduce air and noise pollution from traffic.
- Ensure the efficient movement of freight, whilst minimising its impacts on the transport network.
- To secure investment in critical public transport infrastructure to improve transport connectivity and orbital movements to East London.

Environmental challenges

New development is designed in such a way as to not only enhance the character of the area but also to ensure it does not worsen any environmental problems. Buildings are resource efficient, using less energy, producing less carbon and conserving water. Opportunities for appropriate low carbon, decentralised energy networks and renewable energy are considered and flood risk is reduced. Less waste is produced and more is managed and disposed of locally through new cleaner technologies. Pollution control prioritises key local problems and new development helps bring contaminated land back into use.

9

Objectives:

- Reduce environmental impacts and the use of precious resources in the design and construction of new development.
- Support the development of local energy networks and low-carbon and renewable energy generation.
- Improve the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised.
- Reduce the amount of waste that ends up in landfill, particularly biodegradable waste, and increase self-sufficiency.
- Reduce air pollution and minimise problems of noise and light pollution. Ensure contaminated land can be remediated where possible.

PLANNING STRATEGY

Introduction

The Draft Policies and Designations document (2014) set out a spatial strategy for the Local Plan identifying locations for strategic development and in broad terms the location for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated.

The Focus for the Spatial Strategy

- Bromley Town Centre – a focus for sustainable growth of retail, office, homes, and leisure and cultural activities.
- Cray Business Corridor - the main industrial and business area within the Borough, providing accommodation for a full range of businesses, and improving the offer for modern business.
- Biggin Hill SOLDC a cluster of businesses focused on aviation and high tech related industries.
- Protect and enhance the quality and character of all Bromley's Places.
- Protect and enhance the Borough's varied open spaces and natural environment.
- Improvement of Renewal Areas.
- Maintain and enhance the network of town centres, local centres and neighbourhood parades.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the three dimensions to sustainable development: economic, social and environmental, and the purpose of planning to contribute to the achievement of sustainable development.

For plan-making this means that:

- “ local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted”.

The NPPF (paragraph 17) sets out 12 core planning principles which the emerging Local Plan has incorporated. . This includes “ proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and

other development needs of an area, and respond positively to wider opportunities for growth”.

The National Planning Practice Guidance (2014) advises that “ the NPPF should be read as a whole, need alone is not the only factor to be considered when drawing up a Local Plan”.

The Planning Policy for Travellers Sites (2012) sets out the Government’s approach to the provision for Gypsies and Travellers which the Council has complied with in the Gypsy and Traveller section of the Living in Bromley chapter.

Conformity with the London Plan 2015

Section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004 requires the Council’s development plan documents to be in general conformity with the London Plan.

This requirement is a key factor in the Council’s strategic approach to the location of development and growth and specific Draft Site Allocations within this consultation document.

The London Plan 2015 sets out the minimum housing target for the Borough of 641 per annum (10 year figure of 6413), provides forecasts for employment growth of 13.6 % increase between 2011 and 2036, and identifies the growing demand for school places and other social infrastructure.

The London Plan influences the spatial strategy for the Borough, identifying Bromley as restricted in terms of the loss of industrial land, with Strategic Industrial Locations, two potential Strategic Outer London Development Centres, at Biggin Hill and Crystal Palace, Bromley Town Centre an Opportunity Area, a network of town centres and regeneration areas.

Locations for Development

The requirement to be in conformity with the London Plan, in addition to the NPPF, guides the options the Council can consider for delivering the forecast growth over the plan period, and contributed to the earlier stages of the Local Plan preparation, the ‘Options and Preferred Strategy’ and ‘Draft Policies and Designations’ documents.

The Council has identified three strategic areas for economic growth at Biggin Hill, the Cray Business Corridor and Bromley Town Centre, while seeking to maintain employment opportunities across the borough, and access to services and facilities across the borough. The re-use of existing employment land and floorspace for business use is prioritised with modern and more efficient buildings.

Social infrastructure is required to meet the needs of local communities and therefore should be provided in accessible locations. Ensuring the provision of sufficient education sites to meet the need over the plan period has required an assessment of sites across the Borough.

New housing to meet the minimum 641 London Plan target should be provided in sustainable locations, close to existing facilities, and re-use brownfield sites. The London SHLAA supporting the 641 figure excluded sites with open space designations. The provision of housing over the plan period will not be distributed evenly across the borough, with Bromley Town Centre already providing significant growth as part of the adopted Bromley Town Centre Area Action Plan, and a broad location within the housing trajectory in Years 11 – 15 in line with its Opportunity Area designation. The Borough has a substantial number of conservation areas and Areas of Special Residential Character which impact on the likely scale of development in these areas.

Green Belt and Open Space Designations

The preparation of the Local Plan, is the time that the Green Belt boundaries can, if there are exceptional circumstances, be amended. However, once amended they should be capable of enduring beyond the plan period.

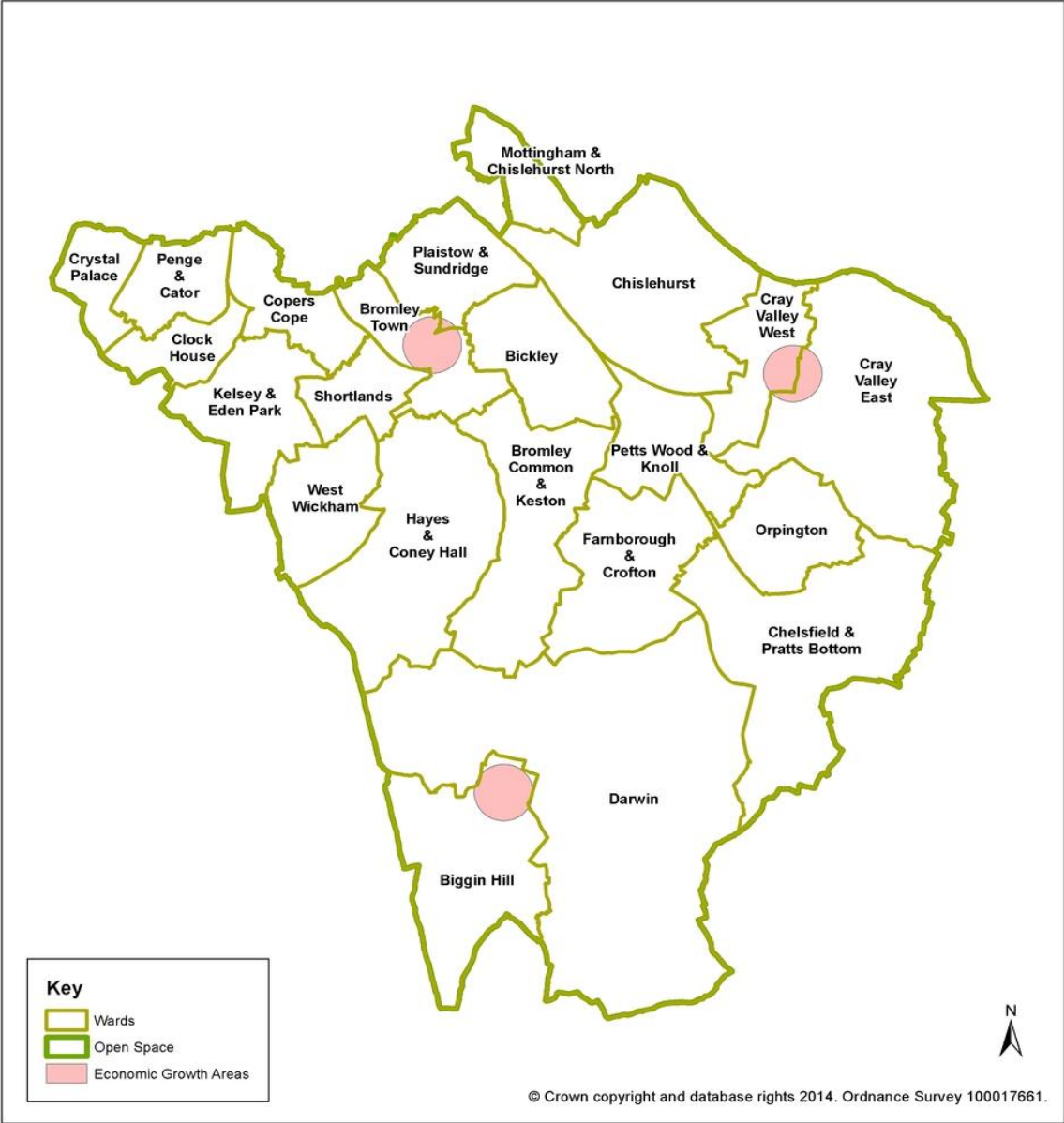
The Council is seeking to amend the Green Belt only where there are exceptional circumstances, and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere.

The areas affected by proposed Green Belt and other open space designation changes are:

Biggin Hill Strategic Outer London Development Centre

New education sites within Green Belt,

Expansion of existing schools



Living in Bromley

Context

National Planning Policy Framework (NPPF, 2012) and National Planning Practice Guidance (NPPG, 2014)

NPPF Paragraph 17 sets out that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

The NPPF section 6 sets out national policy on the delivery of homes. In particular, NPPF paragraph 47 sets out what Local Planning Authorities should do to boost significantly the supply of housing. This includes needs assessments and identifying a supply of housing sites.

In terms of plan making local planning authorities should have a clear understanding of housing needs in their area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability, and the likely economic viability of land to meet the identified need for housing over the plan period. In terms of need the NPPG states that assessing need is the first stage in developing a Local Plan and once assessed a SHLAA should establish the likelihood of land being developable whilst taking into account any constraints such as Green Belt.

To assist in maintaining a five year supply of land for housing the Framework requires local planning authorities to look further into the future and to identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and where possible for years 11-15. Future housing will come from allocated sites and other sources including empty homes brought back into use and unplanned windfall sites and conversions. The allocation of 'large' sites is required though to give more certainty to the continued supply and demonstrate that the Local Plan is sound at Examination.

The NPPG specifies in paragraph 5 that where constraints have been identified the assessment should consider what action would need to be taken to remove them (including when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions may include investment in infrastructure, dealing with fragmented land ownership or reviewing a development plan policy that is constraining development. Paragraph 7 also advises that, where possible, local planning authorities should identify a supply of specific developable sites or broad location for year 11-15. Importantly, local plans can pass the test of soundness where LPAs have not been able to identify the latter.

London Plan (2015)

The London Plan sets many of the parameters for delivering sustainable housing development at London Borough level.

The London Plan para 3.14A and Policy 3.3 specifies that minimum housing supply targets for each borough are set out from 2015 until 2025. For Bromley this target is 641 dwellings per annum. These targets are informed by the GLA's Strategic Housing Market Assessment (SHMA) (2013) and London's housing land capacity as identified through the 2013 GLA Strategic Housing Land Availability Assessment (SHLAA). Consistent with the NPPF this approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development. Paragraph 3.17 sets out that on the supply side, the London SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (para. 47 NPPF) not least its central dictum that resultant development must be sustainable.

The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally (2007 practice guidance).

The London Plan (para 3.19A) observes that national policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their requirements with an additional buffer of 5% moved forward from later in the plan period. In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses and the London SHLAA's evidence, it must be recognised that in addressing this national objective, capacity which elsewhere in the country would be termed "windfall" must here form part of the 5 year supply.

The Inspector's report (Nov 2014) into the Further Alterations to the London Plan paragraph 21 specifies that "Once adopted, statute will require the local plans produced by London Boroughs to be in general conformity with the FALP. That includes conforming with a strategy which seeks to meet London's needs on brownfield land within the existing built up area. The SHLAA identifies most of the existing capacity and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London. Within the confines of the FALP's strategy there is little scope to do more." Paragraph 33 states "However, in order to be in general conformity with Table 3.1, Boroughs need only meet their individual targets".

LB Bromley's housing supply

At present sites that will help contribute to housing supply within the Borough over the next 15 years are included in the Bromley Town Centre Area Action Plan (2010) and the five year supply of deliverable land for housing (June 2015). Some of these sites were also included in the GLA's SHLAA 2013.

A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7200 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum is estimated at approximately 1300 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units.

The Council contributed to the London-wide SHLAA / Housing Capacity Study (SHLAA, 2009). As a result of the Assessment an annual housing monitoring target of 500 units was allocated to the Borough in the 2011 London Plan for the plan period 2011/12 – 2020/21. The Council also contributed to the GLA's SHLAA 2013 which assigned an annual housing monitoring target of 641 units to the Borough and has been adopted through the 2015 London Plan (consolidated with alterations since 2011). The 2013 SHLAA shows that the basis for the increased target from 500 to 641 per annum for Bromley is comprised of small sites. The 2009 SHLAA attributed a small site capacity of 195 units per annum compared to 352 units within the 2013 SHLAA.

The Council updated the five year housing supply paper in June 2015 (previously published in September 2014) in response to the increased annual housing target in March 2015. The Paper sets out which sites and allowances are included within the supply and concludes that Bromley is able to meet its five year housing supply target.

A revised draft housing supply policy sets out an updated target figure for the Borough following the alteration of the London Plan (2015) as follows:

Housing Supply

The Council will make provision for a minimum of 641 additional homes per annum over the fifteen year Plan period which will be facilitated by:

- i The development of Proposal Sites;*
- ii. Town centre renewal involving the provision of housing;*
- iii. The development of housing within Renewal Areas where appropriate;*
- iv. The development or redevelopment of windfall sites;*
- v. The conversion of suitable properties;*
- vi. Mixed use developments including housing in suitable locations;*
- vii. The provision of suitable non self-contained units;*
- viii. Vacant properties being brought back into use;*
- ix. Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities.*

Supporting text

London Plan Policy 3.3 provides a regional context for housing requirements and sets out borough figures for housing provision from 2015/16 – 2024/25 based on the findings of the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment (SHMA) and other analysis.

The Borough has an annual housing provision figure of 641 units per annum as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. The 2013 SHLAA specifies provision of approximately 289 units per annum on large sites (0.25 ha+) and 352 units on small sites. The figure for housing provision will be rolled forward over a 15 year period in line with advice set out in the London Plan and the GLA's Housing Supplementary Planning Guidance (SPG) 2012.

Policy 3.3 of the London Plan specifies that boroughs should enable development capacity to be brought forward to meet targets whilst having regard to other policies in the Plan (i.e. development on brownfield land, intensification, town centre renewal, opportunity areas, mixed use, renewal of existing residential areas). New sites should be identified and existing sites reviewed to enable targets to be met.

A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7200 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum is estimated at approximately 1300 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units.

Demonstrating an adequate supply for the Local Plan period

The results of the London-wide SHLAA (2013) provided the Borough with a minimum housing supply capacity figure of 641 units per year over a ten year period (2015/16 – 2024/25). A number of large sites included in the Council's housing trajectory also formed part of the GLA SHLAA (2013). To supplement the assessment it has been necessary to establish if there are additional sites that can add certainty to the

number of developable sites across the Plan period. Consequently evidence within the GLA's SHLAA will be supplemented with the Site Assessment 2015 based on the annual minimum target figure (included as a supporting document).

Site assessment methodology

The identification and assessment of land available for housing development has followed the methodology in the Planning Practice Guidance.

The main stages of the assessment are:

- Site identification
- Site assessment
- Identification of other sources of supply (windfall sites etc)
- Assessment review – identification of need and production of a draft trajectory. (If there are not enough sites or locations, then further work will be required)
- Production of a final evidence base.

Site identification

Potential development sites for housing (and housing mixed with other uses) have come forward from a number of different sources and activities undertaken during the process of developing the Core Strategy and Local Plan. The first representations regarding sites were submitted in response to the Issues consultation in 2011 and the Options and Preferred Strategy consultation in 2013. These were “banked” and then added to by a formal Call for Sites in 2014 alongside the Draft Policies and Designations documents. In addition, particular landowners that regularly review their property assets were approached, including the Council, the NHS, Network Rail and the Royal Mail. Work on other aspects of the Local Plan has also prompted further investigation of potential areas or specific sites through, for example, the assessment of employment and business land.

Assessment

All sites put forward for housing development have been subject to an information gathering exercise including site visits and aerial photography where required. This has enabled an understanding of the physical characteristics of the sites, any constraints they may have, and any potential linkages with other sites.

These site surveys, along with any information submitted by landowners or their agents, have drawn together the following information:

- Site location, size and potential boundaries
- Current land uses and character
- Surrounding land uses and character
- Physical and environmental constraints including access, contamination, flood risk, infrastructure etc

- Heritage and landscape quality and assets
- Accessibility of the site and proximity to relevant facilities or infrastructure

As stated in the Planning Practice Guidance, the assessment should be guided by the development plan, emerging planning policy and national policy. The Draft Policies and Designations document (2014) set out possible future policies for the Local Plan and this has informed the policy framework for the sites alongside the London Plan and the NPPF. All current and potential policy designations have been noted for each site, for example:

- Open space and landscape – Green Belt, Metropolitan Open Land, Urban Open Space
- Natural environment – Tree Protection Orders, Sites of Special Scientific Interest, Sites of Importance for Nature Conservation
- Heritage, character and quality – Conservation Areas, Listed Buildings
- Business and employment – Business Areas and future business designations, shopping frontages and town centre locations

Assessment review

In order to establish which sites could provide the most sustainable solution to meeting future housing supply, they have been considered in the context of the current and future policy framework – particularly the draft housing supply policy set out above and the spatial strategy in the Draft Policies and Designations document 2014.

Spatial Strategy summary

- Bromley Town Centre – focus for sustainable growth of retail, office, homes, leisure and cultural facilities
- Cray business corridor – the main industrial and business area within the Borough
- Biggin Hill SOLDC – a cluster of businesses focussed on aviation and high tech related industries
- Protect and enhance the quality and character of all Bromley's places
- Protect and enhance the Borough's varied open spaces and natural environment
- Improve Renewal Areas
- Maintain and enhance the network of town centres, local centres and neighbourhood parades

Using this strategy and policy framework, the following eight sites set out in the Housing Trajectory table have been identified for their potential to contribute to housing supply subject to any further work necessary on the individual sites:

Bromley North Station:

Allocate for mixed uses including residential, office, retail and transport interchange (approx. 250 units)

Bromley Civic Centre:

Allocate for mixed use development. Further work to be carried out to review Council accommodation needs and to determine how best the site can contribute additional residential units depending on its need for education purposes. (approx. 20 units)

Gas Holder station, Homesdale Road/ Liddon Road, Bickley:

Allocate for residential led mixed use development (approx. 60 units)

Bromley Valley Gymnastics Centre, Chipperfield Road:

Allocate both parts of the site for mixed use development including reprovision of library, community uses, gymnastics centre and new residential. (approx. 200 units)

Former milk distribution depot, Bruce Grove:

Allocate for residential and/ or employment (approx. 30 units)

Maybrey Works:

Allocate for residential led mixed use development (approx. 60 units)

Land adjacent to Bickley Station:

Allocate for residential development (approx. 30 units)

Bassetts Campus:

Allocate for residential development (approx. 100 units)

The result of the assessment of these and all other sites put forward for consideration as housing allocations can be viewed in the supporting document "Site Assessment 2015".

Housing Trajectory

The trajectory below sets out housing supply for the plan period. It is divided into 3 time periods covering the full 15 years of the Local Plan. In accordance with the NPPF the first five years represent the Five Year Housing Supply position (at the time of writing), years 6-10 demonstrate deliverable sites, and years 11-15 potentially developable sites and broad locations.

Housing trajectory table

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Bickley							
Gas Holder Site Homesdale Road/Liddon Road	CFS	Large	1	0	30	60	90
Land adjacent to Bickley Station	CFS	Large	0.9				
Biggin Hill							
49 Sunningvale Avenue	S	Large	0.26	18	0	0	18
20-22 Main Road Biggin Hill TN16 3EB	P	Large	0.4				
Bromley Common and Keston							
Blue Circle Sports Ground Crown Lane Bromley BR2 9PQ	S	Large	12	155	0	0	155
Bromley Town							
Title House 33-35 Elmfield Road BR1 1LT	S	Small	0.19				
Archers Court 48 Masons Hill BR2 9LG	S	Small	0.2				
Babbacombe House Babbacombe Road BR1 3LW	S	Small	0.05				
Land at South Side of Ringers Road BR1 1HP	S	Large	0.27				
165 Masons Hill BR29HW	S106	Small	0.13	537	890	400	1827
Site B Tweedy Road/London Road	BAAP	Large	0.37				
Site C Town Hall	BAAP	Large	0.7				
Site F Bromley Civic Centre	BAAP	Large	5.75				
Site G West of High Street	BAAP	Large	3.2				
Site K Westmoreland Road Car Park of BAAP	S	Large	0.96				
Site P Sainsburys West Street	BAAP	Large	1.25				
Bromley North Station	CFS	Large	2.86				
Chislehurst							
Graham Chiesman House St Pauls Cray Road Chislehurst BR7 6QA	S	Large	0.9	42	0	0	42
Clock House							
County House 221-241 Beckenham Road BR3 4UF	G	Small	0.12	85	0	0	85
Land Adjacent Clock House Station	UDP	Small	0.01				

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Copers Cope							
Dylon International Ltd Worsley Btidge Road SE26 5HD	P	Large	0.28	332	60	0	392
Dylon International Ltd Worsley Btidge Road SE26 5HD	S	Large	0.28				
57 Albemarle Road BR3 5HL	S106	Small	0.16				
Land rear of 86-94 High Street BR3	S	Large	0.35				
125 Park Road BR3	S	Small	0.11				
Kent County Cricket Ground	S	Large	2.04				
Maybrey Works	CFS	Large					
Cray Valley East							
76 High Street BR6 0JQ	S	Small	0.23	50	0	0	50
Cray Valley West							
Grays Farm Production Village	P	Large	1.09	45	80	120	245
Bromley Valley Gym Chipperfield Road St Mary Cray		Large	2.8				
Crystal Palace							
Anerley School For Boys Versailles Road SE20 8AX	S	Large	0.7	48	60	120	228
193 Anerley Road Penge	S	Small	0.13				
1 Chilham Way BR2 7PR	S	Large	0.78				
The Haven Springfield Road	P	Large	1.4				
Crystal Palace Park Crystal Palace Park Road SE20	P	Large	80				
Farnborough and Crofton							
Bassetts House Broadwater Gardens BR6 7UZ	CFS	Large	2.5	0	100	0	100
Hayes and Coney Hall							
Fair Acres Estate Fair Acres	S	Small	0.01	54	0	0	54
Isard House Glebe House Drive	P	Large	0.57				
Hayes Court West Common Road	P	Large	2.6				
Kelsey and Eden Park							
Langley Court South Eden Park Road	P	Large	10.6	195	0	0	195
The Rising Sun	P	Large	0.18				
Orpington							
Depot Bruce Grove Orpington	CFS	Large	0.3	162	30	0	192
Orpington Police Station The Walnuts BR6 0TW	P	Small	0.2				
Berwick House 8-10 Knoll Rise BR6 0EL	G	Small	0.1				
Plaistow and Sundridge							
Sundridge Park Management Centre Ltd Plaistow Lane Bromley BR1 3JW	P	Large	2.27	158	0	0	158

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Sundridge Park Manor Willoughby Lane Bromley BR1 3FZ	PCO	Large	3				
Holy Trinity Convent School Plaistow Lane BR1 3LL	S	Large	0.95				
25 Scotts Road BR1 3QD	P	Large	0.4				
Plaistow Lane Service Station Plaistow Lane	S	Small	0.1				
West Wickham							
Summit House Glebe Way BR4 0RJ	P	Large	0.5	54	0	0	54
BROAD LOCATIONS (additional units within BTC, or identified through BTCAAP review, continued town centre/retail changing patterns and renewal areas)				0	150	750	900
Sites of 9+ units and broad locations total				1935	1400	1450	4785
Small sites projection (includes sites <9units commenced for first 5 years and projection)				1270	1760	1760	4790
Vacant units projection				100	100	100	300
Prior approval projection				190	60	0	250
Trajectory total				3,495	3,320	3,310	10125
GLA Target				3,205	3,205	3,205	9615
GLA target + 5% buffer				3,365	3,365	3,365	10095
Difference (between trajectory total and GLA target +5% buffer)				130	-45	-55	30

(P=planning permission granted, S=started, CFS=call for sites, G=prior approval granted, BAAP=Bromley town centre area action plan allocation, UDP=UDP proposal site, S106=awaiting S106 signing, PCO=pending consideration)

Summary of trajectory table

Subdivision of small and large sites set out above over Plan period	
Small sites	4790
Large sites	4785
Prior approval and Vacant units	550
TOTAL	10125

In accordance with paragraph 47 (bullet 4) of the NPPF the draft Local Plan will include information on the delivery of affordable and market housing across the plan period and how the Council intends to monitor and manage this delivery to ensure a five year supply of housing is maintained.

Traveller Sites

Context

The emerging Local Plan has set out, in past consultations, the Council's intention to address the accommodation needs of travellers, in line with the "Planning Policy for Traveller Sites" (PPTS), through the allocation of sites with current or historic permissions as Traveller sites. The assessment for traveller use, of sites which came forward in response to the Council's Call for Sites, confirms the lack of alternative sites for use by travellers and supports the "exceptional circumstances" for the Council's approach to making limited alterations to produce "insets within the Green Belt" for use "as a traveller site only."

A recent planning appeal for a Traveller Site (providing an additional two plots to the southern end of the existing permitted Travelling Showmen's Site), was recovered by the Secretary of State and temporary planning permission granted for a three year period (expiring 3rd December 2013). In light of that appeal decision, a further allocation for Travelling Showmen (increasing the extent of the previously proposed allocation by 2 plots) is now recommended. (Map 8 Appendix 1)

The maps in Appendix 1 illustrate this newly recommended allocation and set out the detailed boundaries of the previously proposed Traveller Sites.

The Government's Planning Policy for Traveller Sites (PPTS), relates to "Gypsies and Travellers" and "Travelling Show-people" under the single umbrella of "Travellers". It requires local planning authorities to produce a robust evidence base to establish traveller accommodation needs, in order to inform the preparation of local plans and planning decisions, and to annually update a supply of specific deliverable sites sufficient to provide five years a worth of sites and broad locations for growth for years 6-10, and where possible years 11-15.

In addition to establishing the appropriate level of pitch provision the guidance also requires Local Plans to address effective enforcement of planning policy. Addressing needs in accordance with the guidance will assist the Council in resisting future inappropriate development in the Green Belt. Previously the Council has lost appeal decisions due to the weight Planning Inspectors have given to the issue of identified need that has not been met.

Bromley is covered to a large extent by planning and landscape constraints, notably Open Space designations, including Green Belt and Metropolitan Open Land, along with a range of other protective designations. These designations and other strategic needs of the plan, notably the housing requirement, represent very significant challenges to identifying suitable locations for Traveller Sites.

All existing traveller sites, with or without permission, lie within the Green Belt and are by definition "inappropriate". Past studies, dating back to the 2003 GL Hearne "Bromley Gypsy Sites Study" have illustrated the difficulty, in practice, of finding sites other than within the Green Belt. The GL Hearne study concluded by suggesting that, subject to extensive consultation, allocations from within the Green Belt or Metropolitan Open Land (MOL) might be considered.

Throughout the development of the London Plan 2011 Bromley worked closely with the GLA in developing its borough targets for Gypsies and Travellers and Travelling Showpeople, although the 2011 plan subsequently determined not to set borough targets.

Section 110 of the Localism Act 2011 places a 'Duty to Cooperate' on Local Planning Authorities when preparing development plan documents. The Duty requires constructive, active engagement on an on-going basis to support all activities relating to a strategic matter. This engagement has been on-going with neighbouring authorities, within and beyond London and is detailed in the evidence base, however, these discussions did not result in any expressions of interest or willingness from neighbouring authorities to support the provision of Bromley's identified need.

In line with the Planning Policy for Traveller Sites (PPTS) 2011 and the statutory duty to assess the accommodation needs of travellers under section 8 of the Housing Act 1985, Bromley first published its "Gypsies and Travellers and Travelling Showpeople Accommodation Evidence Base Paper" in 2011. This evidence base has been updated with each subsequent Local Plan consultation and indicates the numbers of council and private sites and the extent of the current unmet need which substantially comprises long established families who have been living on private sites, by virtue of temporary permissions, granted on appeal. Temporary permissions due in part to the inability of the Council to demonstrate that the needs of travellers had been addressed.

The PPTS highlighted the Government aim to promote more private traveller site provision and crucially advised that, whilst the Green Belt should be protected from inappropriate development, in exceptional circumstances, limited alteration to the defined Green Belt boundary to accommodate a site inset within the Green Belt to meet a specific, identified need as "a traveller site only", could be undertaken through the plan-making process.

Local Plan consultations in March 2013 and February 2014, acknowledging the difficulties in finding appropriate traveller sites and the PPTS encouragement of private sites, consulted on addressing unmet need through allocating existing sites inset within the Green Belt for traveller use only.

The Local Plan draft traveller policy, consulted on in 2014, (set out in Appendix 2) makes clear that once the Local Plan is adopted the Council will seek to meet identified need for provision by first considering the potential within allocated Traveller Sites thus enabling it to resist future sites within the Green Belt. Since development for traveller pitches is "inappropriate" within the Green Belt other than "insets" specifically allocated "as a traveller sites only", the scope to meet the five year supply and future provision over the plan period is dependent upon the capacity within the allocated sites. (listed in Table 1 below),

Table 1 Traveller Site Allocations (Previous Consultations)
Detailed boundaries for consultation in Appendix 1

Traveller Site (Gypsies & Travellers)	Planning Status	Pitches
Star Lane	LA (permission)	22
Old Maidstone Road	LA (permission)	14
Land at 148 Croydon Road, Keston	Private (permission)	5
“Meadow View”, Salt Box Hill, Biggin Hill	Private (permission)	3
Land Adj 1 Vinsons Cottages, Hockenden Lane, Swanley	Private (expired temporary permission – application to be determined)	1
Southview, Trunks Alley, Hockenden Lane, Swanley	Private (expired temporary permission – application to be determined)	2
Mead Green, Layhams Road,	Private (expired temporary permissions - applications anticipated) 3 adjacent sites	2
Millies View, Layhams Road,		2
St Joseph’s Place Layhams Road,		2
Traveller Sites (Travelling Showpeople)		Plots
Travelling Showpersons Yard, Layhams Road	Private Authorised	29

At the previous consultation stage (Draft Policies & Designations Feb 2014) two sites were the subject of outstanding planning appeals and not included - Land at junction of Sheepbarn Lane and Layhams Road for 2 Travelling Showmens Plots and a single Gypsy and Traveller pitch at Cudham Lane North (“Archies Stables”).

The appeal which extends the existing Travelling Showpeoples Site by 2 plots, has since been granted temporary planning permission and was therefore subject to the full site assessment for Traveller sites. The second of the two appeal sites for a single Gypsy and Traveller pitch remains outstanding.

The detailed boundaries in Appendix 1 reflect those set out through previous and current planning permissions, with exception of the Council’s site in Star Lane and private sites in Layhams Road. These boundaries have been recommended on the basis of the physical terrain and the desire to produce robust, defensible boundaries as indicated below.

- The Star Lane Traveller site has operated since the 1960s. For rental purposes there is a plan illustrating the individual pitches, however the boundary of the site itself had not been clearly defined. Several years ago works were undertaken to construct steep earth bunds, in the order of 20ft high, separating the traveller pitches from St Pauls Cray Hill Park. It is recommended that the traveller site boundary be defined to reflect the land

currently to the south of the earth bund, to support effective management / maintenance (See Map 1 Appendix 1)

- Layhams Road Sites (“Millies View”, “St Joseph’s Place”, “Mead Green” and “Keston Mobile Park”) As per the various appeal decisions it is recommended that the sites continue to be limited to the rear of the parcels of land, but that a unified, more defensible boundary be created (see Map 7 Appendix 1) to enable more effective monitoring and control of the sites.

Two previously assessed sites, King Henry’s Drive, and “Chalk Pit”, Old Maidstone Road, which were highlighted in the Options and Preferred Strategy consultation (2013) are no longer in traveller use or ownership and as such they were rejected at Tier 3 on grounds of deliverability and therefore no traveller Site inset boundaries are proposed.

Whilst the Local Plan will establish the boundaries of the Traveller Sites, any development within the sites, the siting of caravans, landscaping etc. remains subject to the full planning application process. The evidence base indicates that the boundaries allocated Travellers sites as illustrated can provide the five year supply and address the need for pitches over the plan, subject to the additional allocation for 2 showmen’s plots detailed below, and the outcome of the outstanding appeal for a single gypsy traveller pitch.

Site Assessment methodology

Existing sites and those which came forward through the “Draft Policies & Designations” Call for Sites were subject to a site assessment reflecting the Planning Policy for Traveller Sites (PPTS) which requires local authorities to ensure that traveller sites are sustainable economically, socially and environmentally, specifically identifying the following as being important

- promoting co-existence between the site and the local community
- access to appropriate health services, regular education, welfare and employment infrastructure whilst avoiding undue pressure on local infrastructure and services
- due regard for the protection of local amenity and local environment
- consideration of the effect of local environmental quality (noise and air quality) on the health and wellbeing of travellers and the avoidance of locations in areas at high risk of flooding, including functional floodplains
- effectively using previously developed (brownfield), untidy or derelict land
- protecting the Green Belt from inappropriate development

The Site Assessment set out in detail in the Evidence Base involves a 3 Tier approach

Tier 1 Location and Key Constraints provides a high level sieving process. It identifies key aspects of a site’s location, protective designations, the accessibility of key social infrastructure and its current or proposed use.

- Green Belt and Open Space Protection (excepting existing or historic traveller sites which benefit from current or historic permissions. These sites will progress through the assessment criteria - the lack of alternatives may constitute exceptional circumstances to warrant their allocation).
- Relationship to other Areas of Constraint includes areas of protection (including historic, visual amenity and ecological designations) and hazard areas (including flooding, contaminated land and public safety zones)
- Proximity to Key Social Infrastructure defined as access to a doctors surgery or medical centre, a primary school, and a food shop.
- Land Utilisation Sites which are required to meet other objectives of the plan. Eg featuring in the 5 year housing supply paper

Tier 2 Infrastructure - Following completion of the Tier 1, sites that warrant further assessment were subject to Tier 2, which examines transport and site infrastructure.

- Transport Infrastructure - minimising any impact on local amenity resulting from vehicle traffic, with an independent vehicular access point with access to nearby public transport node.
- Site Infrastructure - Basic infrastructure (water, electricity). Assumed if a potential site / area is located within 500m of existing development

Tier 3 Impact, Access & Deliverability Having met the minimum requirements of Tiers 1 and 2, sites were assessed in terms of the impacts of the site on local character and appearance, impact on and from surrounding land uses, the contribution it could make, land ownership and necessary preparatory work / mitigation.

Site Assessment Results and Recommendations

In order to ensure that all alternatives sites have been thoroughly explored, the Traveller Site Assessment methodology, previously applied to existing traveller sites, in earlier stages of the Local Plan, has been applied to sites coming forward through the call for sites.

The full assessment tables for sites which came forward through the call for sites were used to undertake the Tier 1 sift. The vast majority of sites submitted, were subject to open space protection, in the main Green Belt. Of the remaining sites, whilst they were well located in respect of proximity to key social infrastructure all were dismissed for a range of reasons, notably hazard areas (flood risk, and contaminated land), and areas of constraint (historic, visual amenity and ecological designations). Several sites were sifted at tier 1 on grounds of efficient land utilisation, given their high PTAL ratings they are required to deliver other objectives of the Local Plan. Additionally, had such sites not been sifted at tier 1 there would be significant viability issues (tier 3) for acquisition, as low density Traveller sites in the context of other competing high value and strategically important high density uses.

In his determination of the recent planning appeal for Showpeoples plots at Sheepbarn Lane the Secretary of State agreed with the Inspector's assessment that there does not appear to be any reasonable alternative accommodation for the appellants. The site identified (Map x in Appendix 1) has been subject to the Traveller Site Assessment methodology, and given the need, accepted by the

Secretary of State and in the absence of alternative sites is additionally recommended for allocation as a Traveller Site the site

A further site, in Cudham Lane North, remains the subject of an outstanding appeal. Having initially been recovered by the Secretary of State, it's recovery was subsequently the subject of a Judicial Review and the case has been returned to the Planning Inspectorate for determination. As a Green Belt site currently without any current or historic planning permission, is sifted out at Tier 1. Any future assessment on this site will be considered in light of the outcome of that appeal decision.

5. Conclusions

The Bromley Gypsies and Travellers and Travelling Show-people evidence base addresses the requirement in planning guidance and the statutory duty under section 8 of the Housing Act 1985 to assess the accommodation needs of travellers.

The site assessment process confirms the lack of sites other than in the Green Belt, to meet the needs, supporting the Council approach previously consulted on to allocate existing traveller sites with current or historic permissions.

Following a recent appeal decision a further Traveller Site is recommended for allocation to provide an additional 2 Showmen's plots.

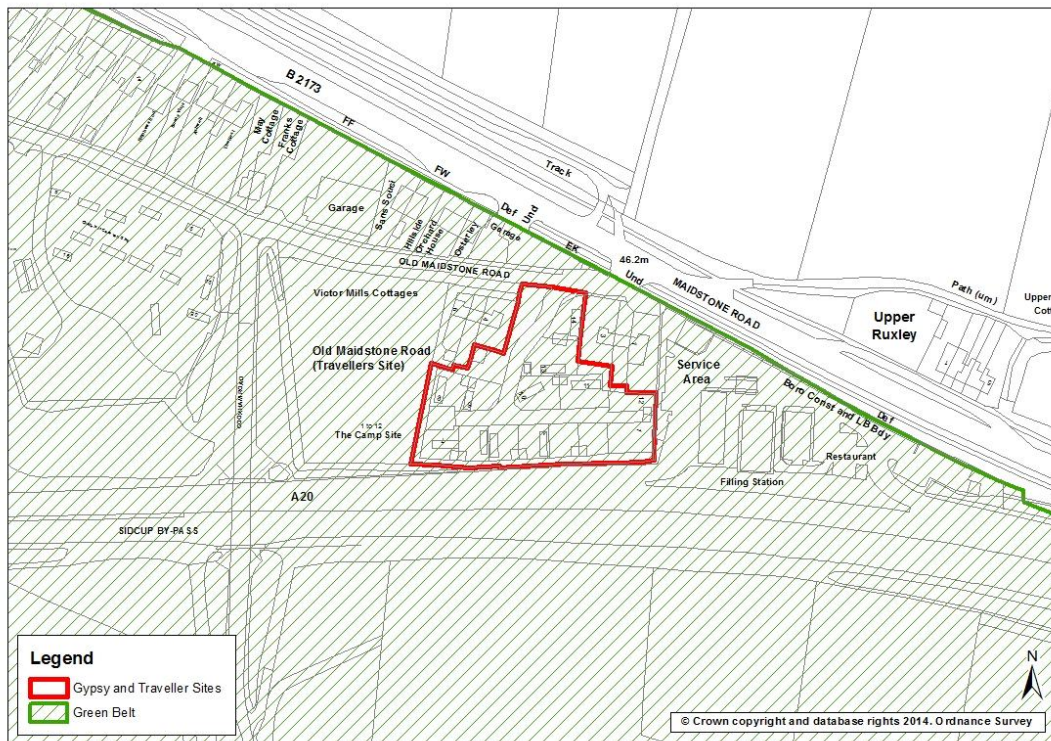
The proposed boundaries, indicated in the appendices, will enable the Council to meet the requirements of national guidance to demonstrate specific deliverable sites sufficient to provide five years a worth of sites and broad locations for the longer term.

Appendix 1

Traveller Site Boundaries



Map 1 Star Lane (Council Site)



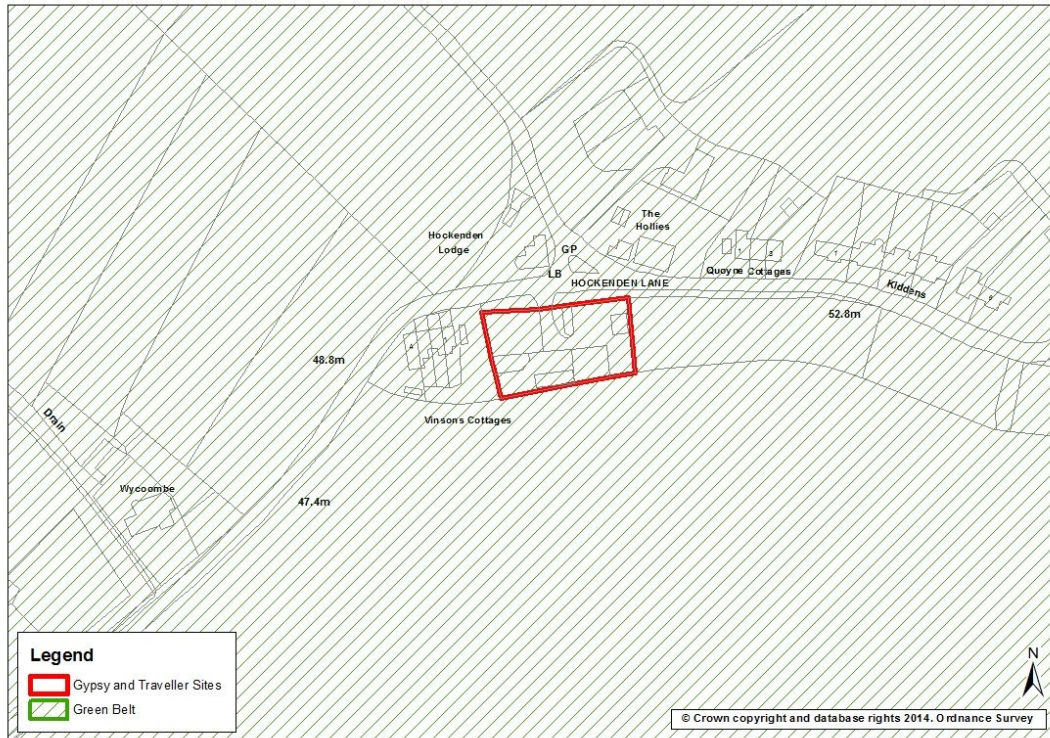
Map 2 Old Maidstone Road (Council Site)



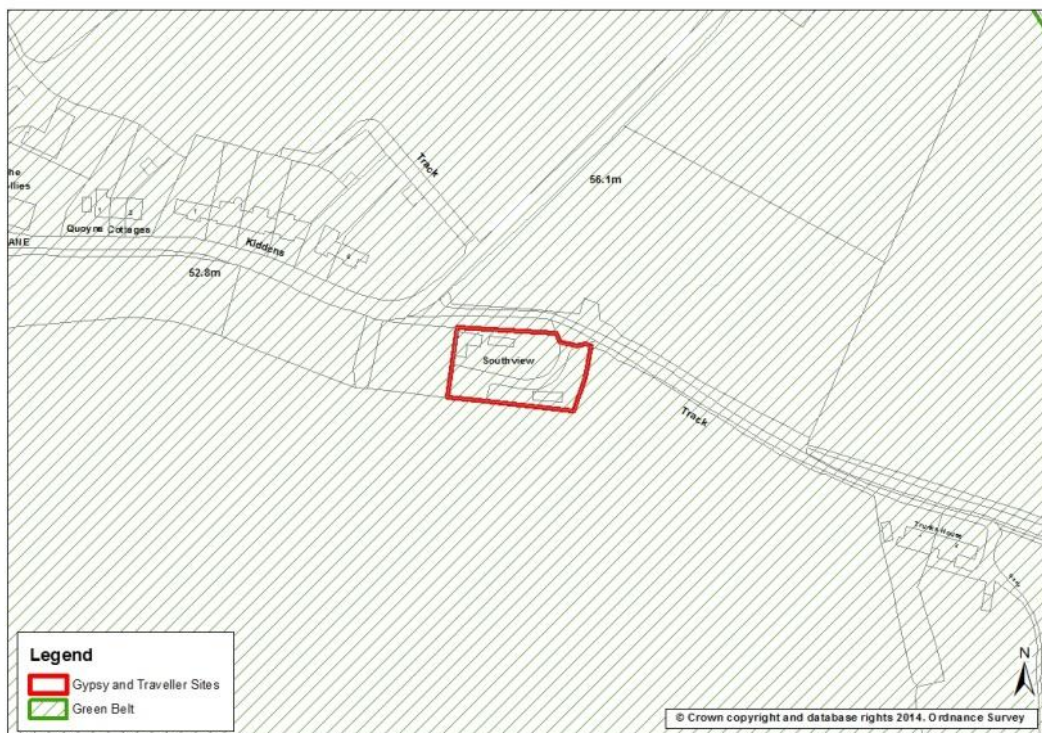
Map 3 148 Croydon Road, (Private site with permission)



Map 4 Meadow View Saltbox Hill, (Private site with permission)



Map 5 Adjacent to Vinsons Cottages, Hockenden Lane - (Private site with expired temporary permission, application being considered)



Map 6 Trunks Alley, Hockenden Lane - (Private site with expired temporary permission, application being considered)



Map 7 Mead Green, St Joseph's Place, Millies View (adjacent sites) and Keston Mobile Park, Layhams Road (Private sites with expired permissions, new applications anticipated)



Map 8 Travelling Showmen's Site Layhams Road, (Private site with permission) indicating recommended extension to the south, at junction with Sheepbarn Lane (Private site with temporary permission)

Appendix 2

Draft Policies and Designations Document (February 2014)

Policy 5.12 Traveller's Accommodation

The Council will monitor and seek to address the accommodation needs of Travellers, including pitches for Gypsies and Travellers, and plots for Travelling Show-people, in partnership with representative groups and the wider sub region.

The Council will seek to meet the identified need for provision by first considering the potential within allocated Traveller sites. Proposals for new development within allocated traveller sites will need to be sensitively located and landscaped to minimise adverse impacts on the visual amenity of the site.

Proposals for new traveller sites to address an identified need for provision will be acceptable provided that:

- i. the site lies outside any areas of constraint, complying with Green Belt and other open space policies, and
- ii. the site is well- related to schools, medical facilities, shops and public transport, and
- iii. there are no adverse effects on the residential amenity of neighbouring properties and the local environment, and
- iv. there are no adverse impacts on the health and wellbeing of travellers related to local environmental quality (such as noise and air quality). Sites in areas at high risk of flooding, including functional floodplains, will generally be resisted given the particular vulnerability of caravans.

With regard to the need for transit pitches the Council will work with the sub-region to secure their provision in an appropriate location within the sub-region.