

Getting Around

Introduction

This section sets out two revised Draft Policies for consultation, Revised Draft Policy Parking and Revised Draft Policy Safeguarding land for transport investment.

In March 2015 the Mayor amended the London Plan Policy 6.13 Parking, with the parking standards in the Parking Addendum to the plan to be '*the basis for considering*' planning applications rather than *being 'applied'*. The supporting text states 'Boroughs wishing to develop their own standards should take the standards in this Plan as their policy context. The London Plan policy and standards are included in Appendix X for ease of reference.

The Council maintains that it should be able to set its own standards, making representations at the Examination into the Further Alterations to the London Plan in September 2014 and subsequently evidence to the Outer London Commission in its study into parking standards in spring 2015.

To inform and support the Local Plan preparation, and in particular the development of its own parking standards the Council has undertaken research into the requirements of residents of new developments, and the impact of these recent developments on the road network.

The Council has identified that significant junction improvements are required at Keston at the junction of the A232 Croydon Road and the A233 Westerham Road and Oakley Road, and is exploring the options for improvement. This is reflected in the revised Draft Policy.

Parking Standards

Bromley's Residential Parking Standards Evidence Paper (2015) researched and assessed car ownership, dependency, and included a post occupation survey of recent development.

This work has informed the proposed revision to Draft Policy 7.1 Parking (included in the Draft Policies and Designations Document). The Council maintains the minimum parking standards approach to residential development included in the Options and Preferred Strategy consultation in 2013, and in the Draft Policy included in the Draft Policies and Designations Document (2014) on the basis of the research evidence, and the amendments to the London Plan in 2015.

The revised draft policy retains the minimum residential parking standards at the level set out in the Draft Policies and Designations Document for the majority of the Borough. This reflects the largely suburban, and in some areas semi-rural characteristics of the Borough, and also the predominately radial provision of the public transport network, which does not replicate the travel patterns of many residents for work, study, leisure, and other purposes. It identified three areas or 'zones' where public transport accessibility is identified as **good** and a second lower set of minimum standards for residential parking would be appropriate. Together these enable the Borough to provide a draft policy in general conformity with the London Plan (LP Policy 6.13 and Table 6.2).

Revised Draft Policy Parking

i. The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms	2 spaces
3 bedrooms	1.5 spaces
1-2 bedrooms	1 space

Except in the three 'parking zones' identified on Maps a, b, c, where

The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms 1.5 spaces

3 bedrooms 1 space

1-2 bedrooms 0.7 space

ii. The accessibility, type, mix and use of any new development along with availability and opportunity for public transport will be considered when determining appropriate levels of residential vehicle parking.

iii. Parking for all other types of development is to be provided at levels set out in London Plan (LP) Table 6.2

iv. In addition to the above, developments must:

- a. provide designated blue badge parking as per LP Table 6.2.
 - b. meet minimum cycle parking standards as per LP Table 6.3
 - c. ensure 1 in 5 spaces have provision (both active and passive) for electric vehicle charge points.
 - d. make provision for a car club, if above the minimum Transport for London (TfL) threshold.
- v. Where parking pressures are identified at and around key public transport interchanges, new parking proposals will be supported on the basis that they do not undermine policies to encourage walking, cycling and public transport use.
- vi. For development where servicing problems may arise, the Council will normally require off-street/rear servicing facilities.

Supporting Text

The National Planning Policy Framework (NPPF) Paragraph 39 does not set national parking standards but instead encourages Local Authorities (LA) to develop their own standards taking into account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

Local Authorities are also encouraged to improve the quality of parking in town centres to ensure convenience, safety and security, including appropriate provision for motorcycles.

Given Bromley has one of the highest car ownership levels in London (1.2 per household, Census 2011) and only an average public transport accessibility level score of 2.7 (Transport for London, 2010), it is considered necessary for parking standards to be reflective of local circumstances. Minimum levels of parking for residential development are required in order to ensure new developments do not generate additional intrusive or obstructive on-street parking as a result of inadequate on-site provision.

Standards in neighbouring authorities should also be taken into account and be consistent, particularly considering the competition with Kent.

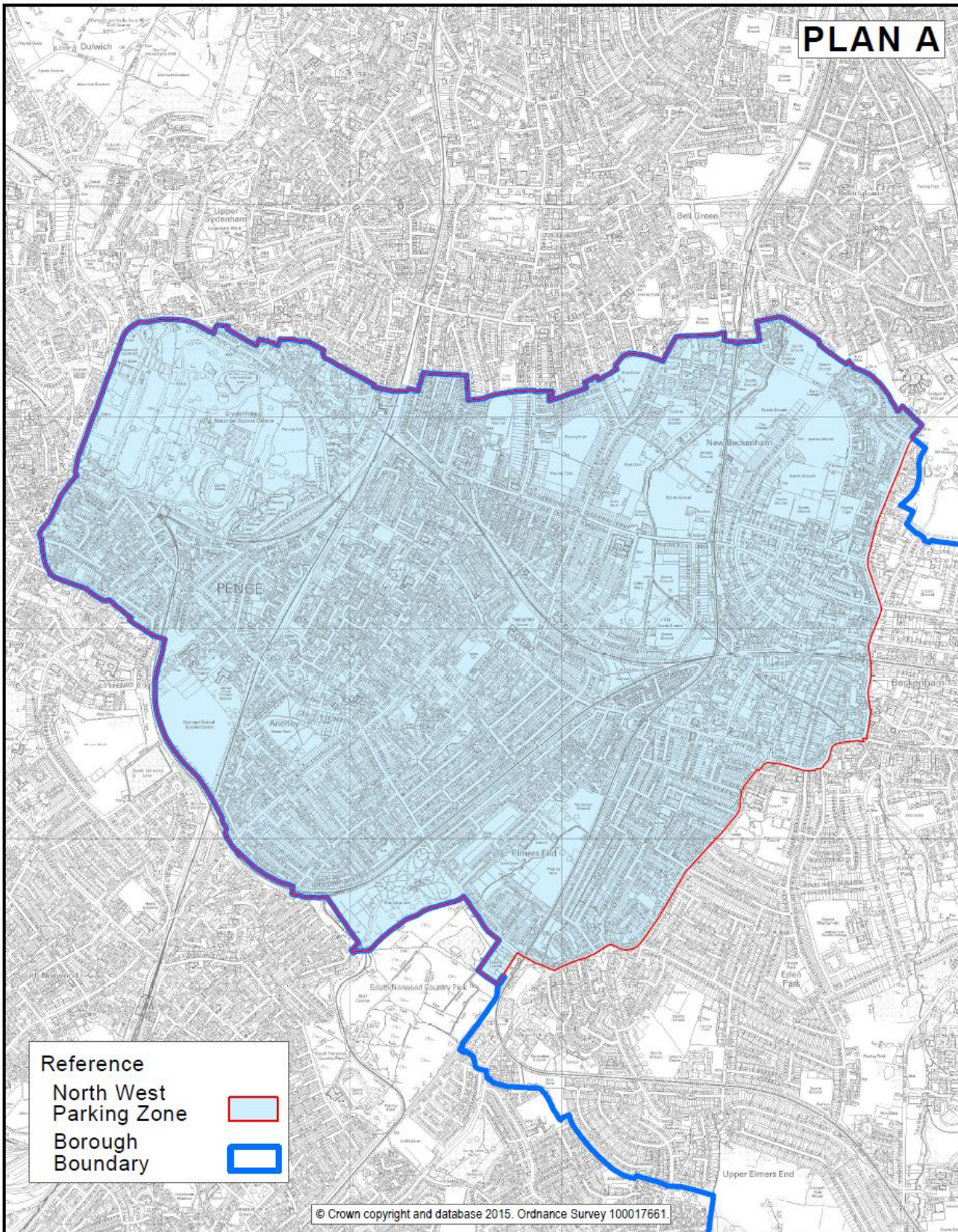
The London Plan includes a parking policy (6.13) along with maximum parking standards. The Plan acknowledges the need for a flexible approach to car parking provision ensuring a level of accessibility by private car consistent with the overall balance of the transport system at a local level.

The Council has undertaken research which identifies three areas of the borough where lower minimum parking standards than the rest of the borough would be appropriate given their higher level public transport accessibility. The use of two sets of minimum standards uses the flexibility provided by the London Plan to ensure that, as far as possible, parking at new developments is sufficient.

Local flexibility can therefore be achieved with the application of the parking standards in tandem with other policies of the London Plan. For example, the Mayor's Housing SPG includes car parking provision guidance and a proposed matrix which illustrates possible flexibility between low Public Transport Accessibility Levels (PTAL) and housing density.

The three areas of the Borough where the lower minimum residential parking standards will apply comprise: North West Parking Standards Area, Bromley Town Centre Parking Standards Area, and Orpington Parking Standards Area. These are shown on maps, A, B and C.

PLAN A



Reference
North West
Parking Zone 
Borough
Boundary 

TOWN PLANNING



JIM KEHOE
CHIEF PLANNER,
CIVIC CENTRE,
STOCKWELL CLOSE,
BROMLEY, KENT, BR1 3UH.
Tel: 020 8464 3333

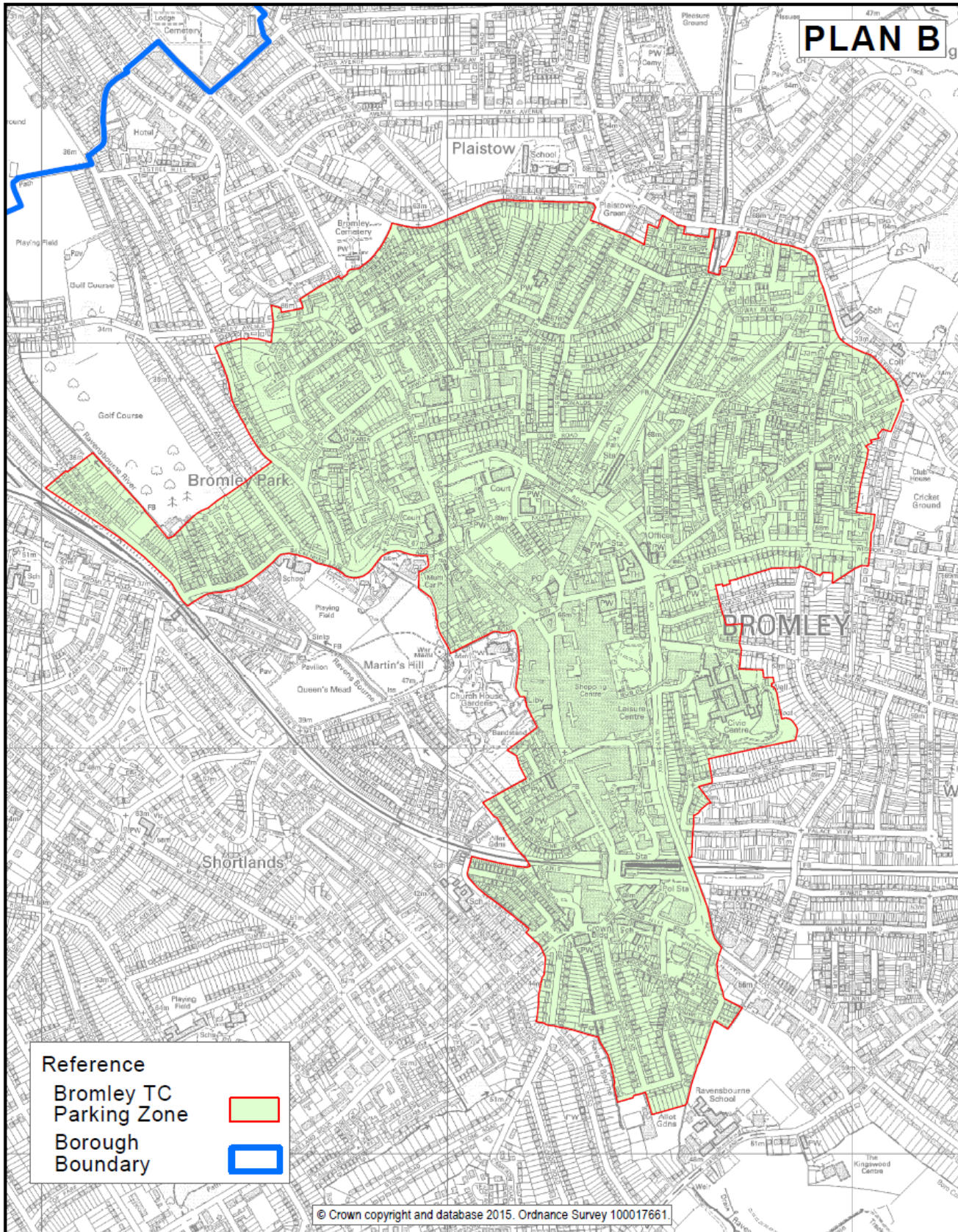
NORTH WEST PARKING ZONE

Scale 1:23,000



03/07/15

Plan No.



TOWN PLANNING



JIM KEHOE
 CHIEF PLANNER,
 CIVIC CENTRE,
 STOCKWELL CLOSE,
 BROMLEY, KENT, BR1 3UH.
 Tel: 020 8464 3333

**BROMLEY TOWN CENTRE
 PARKING ZONE**

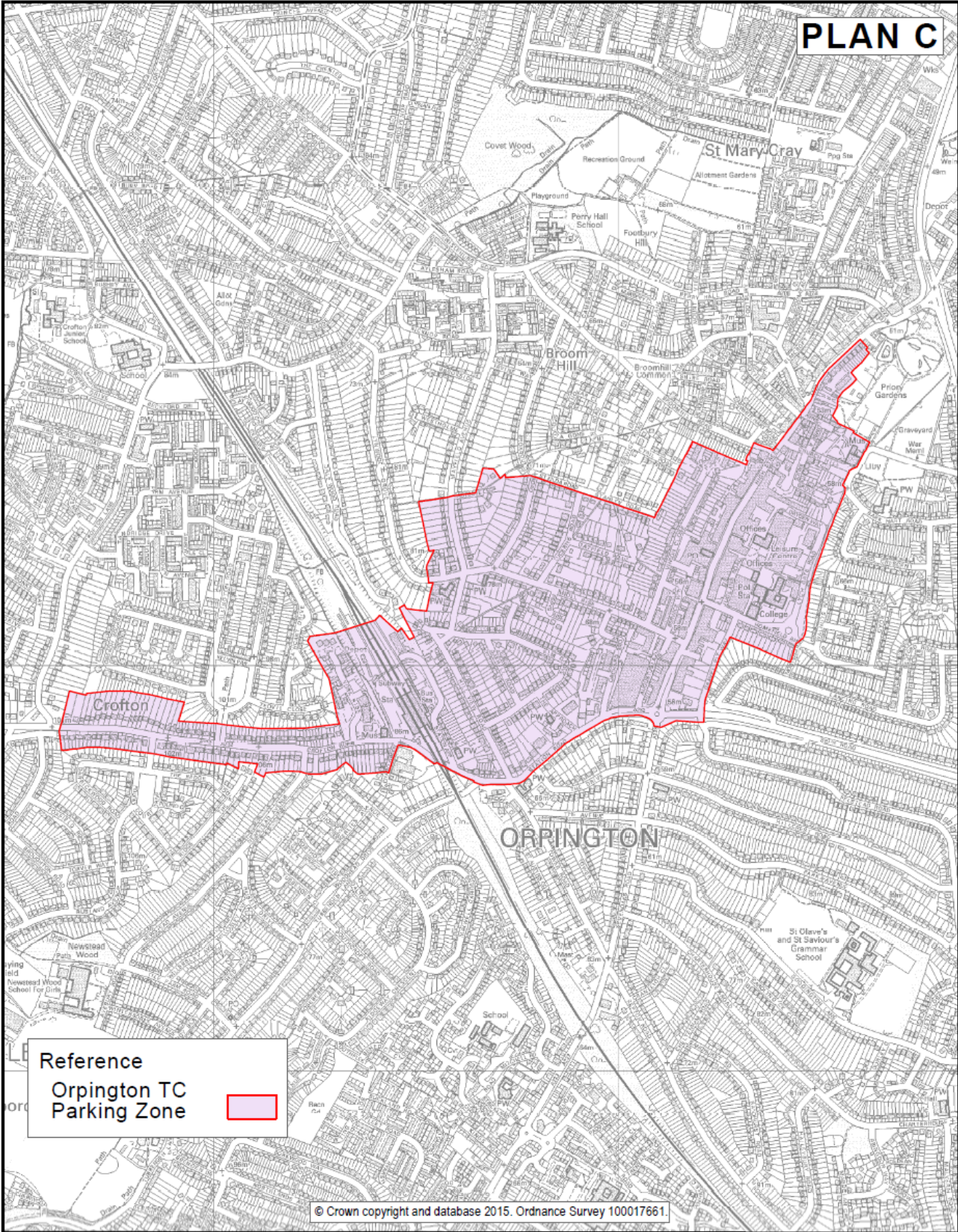
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03/07/15

Plan No.

PLAN C



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TOWN PLANNING



JIM KEHOE
CHIEF PLANNER,
CIVIC CENTRE,
STOCKWELL CLOSE,
BROMLEY, KENT, BR1 3UH.
Tel: 020 8464 3333

ORPINGTON TOWN CENTRE PARKING ZONE

Scale 1:12,000

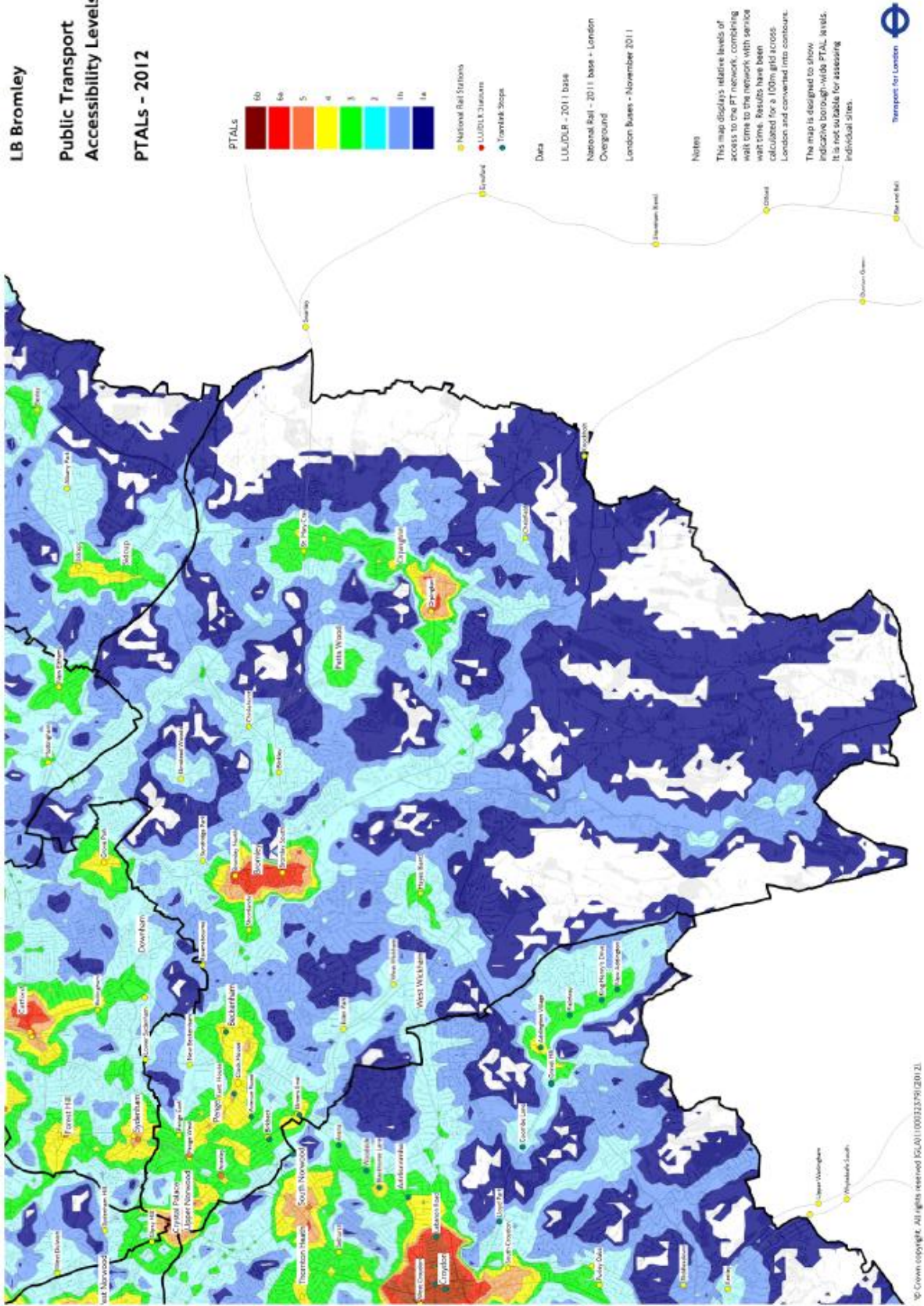


03/07/15

Plan No.

Public Transport Accessibility Levels (PTALS)

LB Bromley Public Transport Accessibility Levels PTALS - 2012



Safeguarding land for transport investment

Revised Draft Policy Safeguarding land for transport investment

The Council will continue to safeguard land for the following transport investment schemes:

- A21 Masons Hill, between Kentish Way and the B265 intersection Hayes Lane and Homesdale Road

The Council will **continue** safeguards currently in force relating to land at:

- A233 Leaves Green Road/Downe Road to Blackness Lane, Keston
- A208 Mottingham Road/ Whitehorse Hill/ William Barefoot Drive/ Elmstead Lane
- B251 Hayes Lane/ Shortlands Road/ Scotts Lane

The Council proposes to safeguard land at the junction of the A232 Croydon Road and the A233 Westerham Road and Oakley Road for major junction improvement

The Council proposes the safeguarding of land and route alignment for the following public transport investment (including land for construction and operation):

- Docklands Light Railway from Catford to Bromley South via Bromley North
- Tramlink from Beckenham Junction to Crystal Palace

Supporting Text

The London Plan places onus on the Council to ensure provision of sufficient land for the provision of an expanded transport system through the safeguarding of existing land used for transport or support functions and identifying and safeguarding sites, land and route alignments to implement transport proposals that have a reasonable prospect of provision. Until demonstration by TfL of a sound business case taking into account the detriment to existing national rail services to Hayes, the Council will not support safeguarding of land for any extension of the London Underground.

As well, the London Plan (policy 6.2) encourages improvements to the public transport system including the enhancement of the Docklands Light Railway and Tramlink along with extensions of the London Underground and Overground.

Transport for London and the Council are exploring the potential of significant junction improvements at the 'Keston Mark' junction – the A232 Croydon Road and the A233 Westerham Road and Oakley Road. Significant delays are experienced by all road users on all four arms of this important junction, including buses which are often forced to terminate when they fall too far behind schedule. This situation would be further exacerbated with an increase in road traffic associated with Biggin Hill Airport and the proposed economic growth at the Biggin Hill SOLDC.

Valued Environments

Introduction

This chapter sets out policies and designations to protect and enhance the natural and built environment of the Borough. These include a wide range of locally, nationally and internationally designated open biodiverse and natural spaces and landscapes as well as designated buildings assets and areas with historic and/or other special and distinctive value. This section sets out proposals for policy and designation changes relating to Areas of Special Residential Character (ASRCs) and Sites of Interest for Nature Conservation (SINCs).

The National Planning Policy Framework (NPPF) identifies the design of new development as a key aspect of good and sustainable planning. Paragraph 58 of the NPPF states that the Local Plan should “develop robust and comprehensive policies that set out the quality of development that will be expected for the area [...] based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics”. London Plan policy 7.4 also identifies that “Boroughs should consider the different characters of their areas to identify [...] places where that character should be sustained, protected and enhanced through managed change”. Areas of Special Residential character are residential areas with special and distinctive qualities which are considered to deserve such protection and enhancement.

The preparation of the local plan provides the first opportunity to put forward new proposed Areas of Special Residential Character for consultation since the Unitary Development Plan was adopted (2006) and to create a strengthened and sound policy framework applying to ASRCs which is compliant with both NPPF and London Plan requirements. This section sets out, and seeks comments on, a revised policy to manage development within Areas of Special Residential Character (ASRCs), as well as on the proposed designation of two new proposed ASRCs and their boundaries. The potential for other areas of the borough to be granted the designation has also been considered drawing on local expertise.

The NPPF requires local authorities to set out a strategic approach within Local Plans planning positively for the creation, protection, enhancement and management of networks of locally, nationally and internationally designated biodiversity and green infrastructure. Local Authorities are also required by the Wildlife and Countryside Act (as amended by the Countryside and Rights of Way Act 2000) to have regard to the desirability of conserving and the natural beauty and amenity of the countryside. The Council’s policies aim to protect sites and features of ecological interests and value, including through the designation of Sites of Importance for nature conservation (SINCs), also recommended for protection by London Plan policy 7.19.

Existing and proposed new SINC's were reviewed in 2011 and this stage of consultation on the Local Plan also provides the opportunity to invite comments on resulting proposals for new, extended and upgraded SINC's for the first time since the UPD was adopted. The changes proposed (new, extensions and upgrades) are presented in a separate consultation paper which details each change. Where no change is proposed the adopted 'UDP Proposals Map (1:10,000 scale maps)' should be consulted to view the existing SINC's. Those can be viewed at the following link: http://www.bromley.gov.uk/UDP/map_index.htm

The document sets out the context, policy background and approach to the review, an overall analysis of the site characteristics, schedules detailing each site by type (Metropolitan, Borough and Local) and maps of each proposed change.

Note: There will be a [link](#) inserted here when the consultation goes live to a document located within the 'supporting documents' folder on the consultation portal. The document is presently included in an appendix to this committee report.

Areas of Special Residential Character (ASRCs)

I. Context and Methodology

The ASRC designation is intended to provide residential areas which are able to demonstrate special character with some protection in addition to that conferred by other policies in Bromley's Unitary Development Plan, adopted on 20 July 2006.

The Council is working on its Draft Local Plan and is now reviewing areas which have been suggested for ASRC status at various stages of the consultation process:

- A boundary for a potential Chelsfield Park ASRC (in Chelsfield and Pratts Bottom), was submitted by Chelsfield Park association in 2003 and recommended for consideration as part of the Local Plan process at Development Control Committee on June 07 2004 .
- Marlings Park Estate (Chislehurst) was put forward for consideration as a potential ASRC Further to the consultation on the Local Plan's Options and Preferred Strategy document which in March/April 2013. The proposed boundary was drawn following an assessment of a wider area.
- The boundary of the potential Central Beckenham (including The Drive, Church Avenue, The Crescent, top of Rectory Road) ASRC was put forward for designation by the Central Beckenham Resident's Association in July 2013.

- The boundary of Bickley's Area of Special Residential Character was requested to be reconsidered by residents living in the vicinity following consultation on the Local Plan Draft Policies and Designation.

In addition to general development control guidelines applying to ASRCs, Appendix II of the UDP sets out the criteria against which applications for ASRC status should be assessed. When assessing the areas proposed against the UDP criteria it was noticed that it does not reflect what should be a central requirement for ASRCs to demonstrate a special and distinctive character having regards to other residential areas of the borough. The areas suggested were assessed against the criteria amended as below (changes are shown in *italics*) to account for this lacking.

The criteria for designation of an area as an ASRC are as follow:

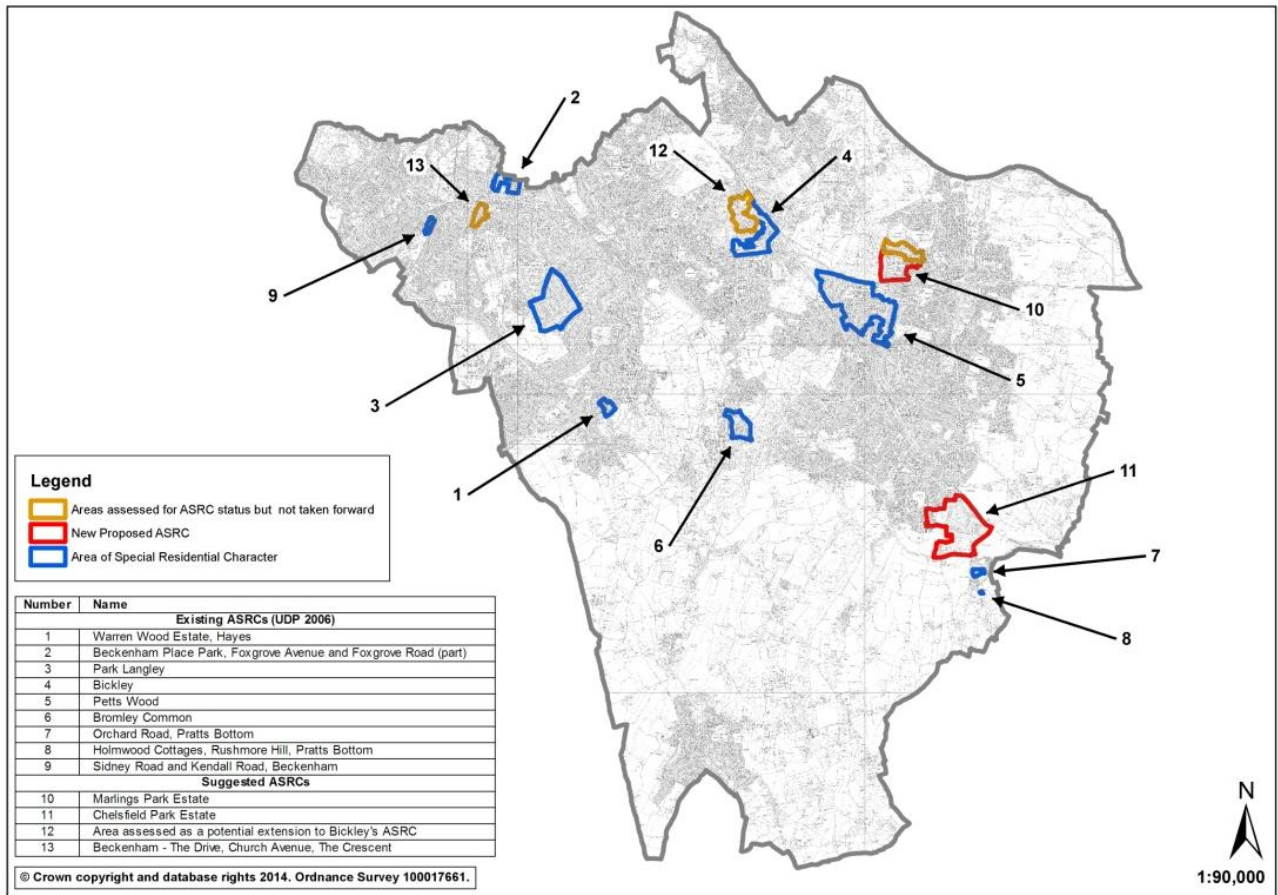
- (i) There should be a sufficient number of properties to form an area of distinctive character. The areas should be well established, readily identifiable and coherent
- (ii) The majority of properties should have the same readily identifiable characteristics (e.g. spatial standards similar materials, well landscaped frontages) *contributing to the area's special and distinctive quality*".
- (iii) The boundary should be easily defined and defensible
- (iv) The areas defined should be primarily residential in character

More details about the rationale of the assessments can be found as part of the Proposed Areas of Special Residential Character Assessment Evidence Base paper which can be found at [\[Add internet Link to the evidence base paper\]](#).

The assessment justifies that the proposed Chelsfield Park and Marlings Park residential areas are proposed to be taken forward as Areas of Special Residential Character at the next stage of the Local Plan.

The map below shows Bromley's adopted Areas of Special Residential Character as set out in the adopted 2006 UDP in addition to the areas that have been assessed at this stage of the local plan process and are either considered to not meet the criteria or are deemed meet the criteria and are proposed to be taken forward as ASRCs as part the Local Plan.

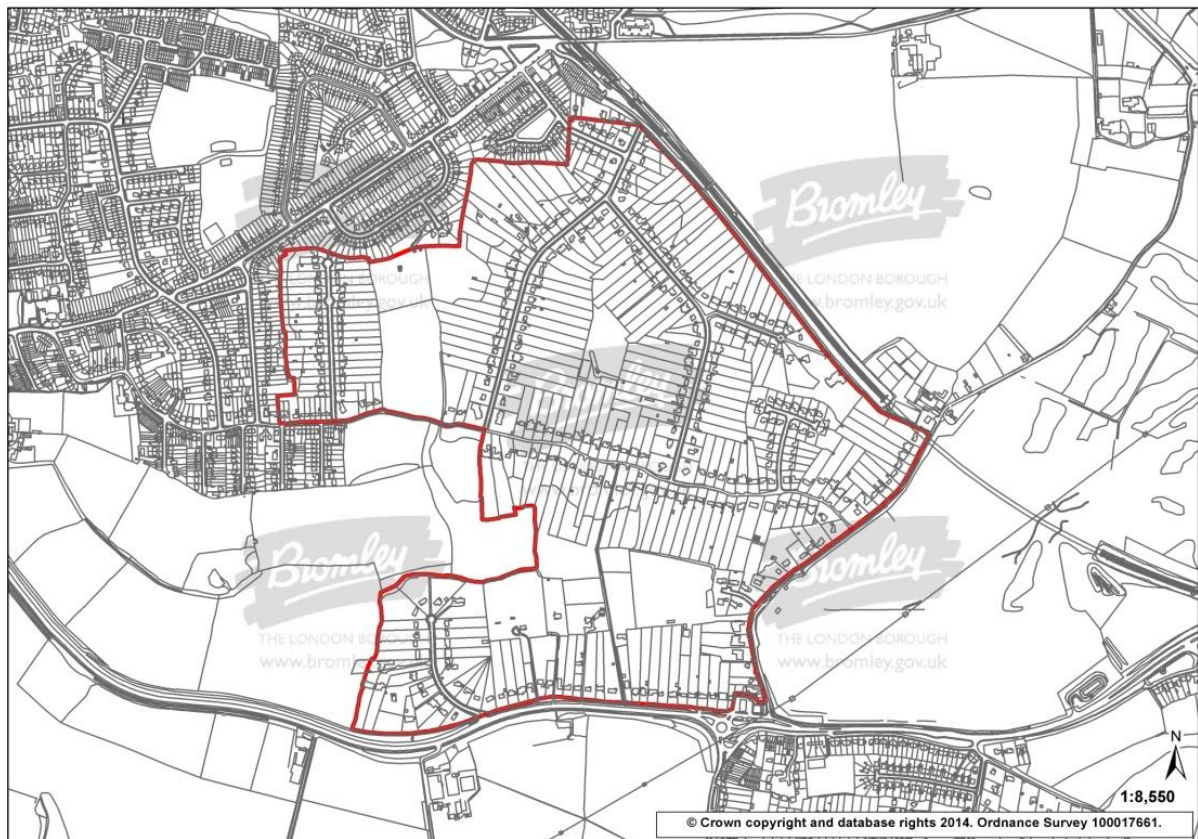
Map 1 . Existing and proposed Areas of Special Residential Character



Proposed new Areas of Special Residential Character

Chelsfield Park

Map 2. Chelsfield Park's Proposed ASRC boundary



B. Marlings Park

Map 3. Marlings Park Proposed Area of Special Residential Character



Revised Draft ASRC policy

Areas of Special Residential Character

Development proposed within Areas designated as Areas of Special Residential Character on the proposals maps will be required to respect, enhance and strengthen their special and distinctive qualities.

Supporting Text

The council has identified well established and coherent Areas of Special Residential Character where redevelopment proposals should preserve, respect, enhance and strengthen the identified characteristics which contribute most to the area's special and distinctive quality. Further guidance relating to the management of development within those areas will be provided as part of the Council's Character and Design SPD.

Area descriptions

Policy background information

Appendix 1 “Areas of Special Residential Character” of the 2006 UDP includes short descriptions of the existing ASRCs which are to be used as a basis to assess whether planning applications are likely to have a negative impact on the “individual character and quality” of those areas.

Descriptions, included below, are needed for the Chelsfield Park and Marlings Park estates. Those descriptions are based on the detailed assessments of those areas included within the evidence base report and are proposed to be taken forward at the next stage of the Local Plan.

Area descriptions

Chelsfield Park

Chelsfield Park estate includes about 370 properties on 81 ha of land. The area is bounded by the railway line and the A21 and mostly inset within greenbelt land which provides it with robust and defensible boundaries in addition to providing it with a form of insularity which informs its character. The area was established from the 1930s onwards by Homestead and includes a mix of detached properties, ranging from original Homestead chalet and cottage houses to a majority of large contemporary five to six bedroom family houses built in a variety of styles. Most houses are set within very large plots laid out along long roads, showcasing mostly landscaped front gardens and substantial rear gardens. Trees predominate within the landscape and tend to obscure the building line by virtue of their presence within front and back gardens, in the large gaps between buildings and within the numerous hedges which define property boundaries. The estate comprises areas of greenbelt which include woods and agricultural grazing land. The distinct character of Chelsfield Park results mostly from its spacious sylvan, landscaped and semi-rural setting combined with the wide variety in the styles, sizes and designs of houses.

Marlings Park Estate

The area comprises a total of 279 residential properties developed from the 1930s to the 1970s. The area is bounded by the A208 and Greenbelt to the West, the railway to the south and by residential areas of a distinct character to the east and the north beyond Leeson Hill which all provide a defensible and robust boundary. It includes a majority of two storey detached properties set within plots regularly laid out onto long roads. Houses include good size back gardens and front gardens most of which remain open and many of which are landscaped with trees, shrubs and flower beds and/or fronted by low boundary walls. Properties on Orpington Road however are an exception as these feature gates, high boundary walls and hedges in keeping with the larger average size and footprint of houses which are set within larger and longer plots than in other parts of the area. Trees to the rear and in gaps between

properties are visible from the street. The public realm is of a high quality with pavements featuring grassed verges and trees. Most houses are of a good quality Neo Tudor architectural or Arts and Craft design which gives pride of place to English vernacular features. Properties typically combine the use of materials such as the use of half timbering and weather boarding, hung tiling, plain or ornamental brickwork or render and are topped with various types of often multilevel roofs adding to their character, including mansard, hip, barn hip and gambrel roofs. Most windows are multi-panelled case and bow windows.

Supplement to the description of the Petts Wood Area of Special Residential Character as set out in Appendix One of the UDP

Context

At the Development Control committee held on the 24th of March 24 2015, the Executive resolved that the description of Petts Wood Area of Special Residential Character as set out in Appendix One of the UDP should be supplemented with an updated statement forming the basis of any description of the area within the Local Plan.

The statement submitted has been summarised and contextual elements have been added to the description to set out more clearly the characteristics which are considered to contribute to the area's special and distinctive character as part of the description proposed and echo the proposed format of the descriptions proposed for Marlings and Chelsfield Park ASRCs. It needs to be noted that the area itself has not been reassessed as an ASRC.

Proposed Petts Wood Area description

The area includes 1539 detached and semi-detached residential properties on circa 111 hectares of land. It is bounded by the railway to the north, Chislehurst Road Conservation Area's boundary to the south east, tree preservation orders and the railway to the north west (excluding urban Open Space, Petts Wood Square Conservation Area and other town centre uses to the west), part of St John's Road to the south, the Chenies Conservation Area to the south as well as residential areas considered to be of a distinct character and/or standard to the south and to the west of Crofton Lane and east of Grosvenor Road.

The original plans for Petts Wood date from the late 1920s and the early 1930s. Whilst there have been some changes post war the prevailing design of the buildings is from the 1930s and remains largely intact. Some of the properties have been built by the architect Noel Rees who designed all of the building within the neighbouring Chenies Conservation area. Whilst Houses were built over a number of years, in a number of similar though varied styles, the road layout and plot sizes were established in an overall pattern which largely remains intact today. The spaciously sized plots were originally designed following the garden suburb principle by developer Basil Scruby. The regularity of front building and rear building lines, the consistency in the front roof lines largely untouched by roof extensions or conversions and the symmetry between pairs and neighbouring pairs of houses are

of importance in defining the character of the area. The Petts Wood ASRC has an open, suburban and semi-rural feel, predicated by low boundaries and visible front gardens set back from the road as well as the width of the separation between the houses which is of a particularly high standard. This allows many of the trees and greenery which prevail throughout the area to be seen from the street. Large rear gardens also provide the area with a high level of amenity.

DRAFT

Working in Bromley

Context

National and Regional

The National Planning Policy Framework 2012 (NPPF) paragraph 20 places emphasis on the building a strong competitive economy. It states that local planning authorities should 'plan proactively to meet the development needs of business and support an economy fit for the 21st century'.

The London Plan 2015 sets out revised projections for employment growth in the Borough at a rate of 13.6% (16,000) between 2011 and 2036 from 118,000 to 134,000 jobs, a significant rate of increase. London Plan Policy 2.7 Outer London: Economy seeks to address constraints and opportunities in the economic growth of Outer London so it can rise above its long term economic trend. To support this, The London Plan identifies Strategic Outer London Development Centres (SOLDCs) which economic functions operate above the sub-regional level. Within the Borough, Biggin Hill and Crystal Palace are identified as SOLDCs.

The London Plan Policy 4.4 adopts a plan, monitor and manage approach to industrial land, with benchmark changes in land, and guidance on vacancy levels which enable choice and flexibility for businesses set out in the SPG 'Land for Industry and Transport'. Whilst manufacturing across London is projected to continue to decline, Bromley is identified in the London Plan as part of a group of boroughs having restricted scope for release of industrial land.

The pressure on offices for other uses is recognised in Policy 4.2, boroughs are encouraged to monitor the impacts of Permitted Development Rights (PDR), and where appropriate protect, renew and modernise existing office stock in viable locations to improve quality and flexibility.

Growth in employment is expected to come primarily from sectors occupying office floorspace and the Local Plan will seek to enable the provision of an adequate supply of a range of good quality commercial floorspace. The London Office Floorspace Projections, July 2014 produced for the GLA identified a forecast additional need for office accommodation of between 84,000 and 114,000 sq metres within the Borough, but also identified a historic loss since 2000 in the Borough, and a scenario of a -4,000 sqm loss over the period 2011-2031.

Emerging Local Plan

The Council identified three strategic areas to focus economic growth in its spatial strategy set out in the Draft Policies and Designations document 2014 (DP&D). These comprise Bromley Town Centre, the Biggin Hill SOLDC, and the Cray Business Corridor. Alongside this the Council aims to maintain the economic prosperity of all parts of the Borough and the aim of the designations and allocations proposed in this chapter is to achieve this balance.

The (DP&D) set out proposed Strategic Industrial Locations (SIL), Locally Significant Industrial Locations (LSISs), the Biggin Hill Strategic Outer London Development Centre, and Business Improvement Areas (BIA).

Following the publication of the Mayor's Further Alterations to the London Plan (2015) and supporting evidence base the Council has undertaken research into the supply and demand for commercial floorspace and the options for meeting needs as required by the NPPF and the London Plan, with the aim of managing supply. This research together with the London Plan and its supporting documents form the evidence base for proposed employment designations in this chapter. The evidence base will be updated as necessary in advance of the publication of the Draft Local Plan. The Further Alterations also identified Crystal Palace as a potential Strategic Outer London Development Centre in the London Plan 2015.

The proposed designations in this chapter are part of the strategy to provide an adequate supply of sites as well as a suitable range of accommodation to meet existing and new business needs.

The GLA's revised employment forecasts, 2015 London Plan and the Council's review of industrial and office supply has led to identifying additional and revised proposed designations in relation to industrial and office use, the Biggin Hill SOLDC and proposed Crystal Palace SOLDC. The designations to be taken forward into the Draft Local Plan can be summarised as:

- Proposed Business Improvement Areas (Bromley Town Centre) continue as in the Draft Policies and Designations document.
- Strategic Industrial Locations (Cray Business Corridor) – Crayfields Business Park which formed part of the Strategic Industrial Location is identified as a Strategic Office Cluster in this document, the remainder of the SIL designation remains as in the DP&D.
- Locally Significant Industrial Locations (Borough-wide) Creation of seven new LSISs and amendments to the boundary of the Lower Sydenham LSIS and the removal of the Homesdale Road LSIS.
- Key Office Clusters (Borough-wide) is a proposed new designation to safeguard the clusters of offices identified as important to the Borough, and supporting the provision of good quality office stock to meet future demands.
- Biggin Hill Strategic Outer London Development Centre. The SOLDC proposed boundary remains as in the DP&D but following an assessment of the capacity and the requirements for the delivery of the SOLDC amendments to part of the Green Belt within the SOLDC boundary are proposed. Two additional policies relating to areas of the SOLDC are also set out.

- Crystal Palace Strategic Outer London Development Centre. This is a new proposed designation with a draft policy reflecting the 2015 London Plan Policy 2.16.
- Map 1 shows the proposed designations in this document together with those in the DP&D for ease of reference.

Industrial Land

As outlined earlier the London Plan 2015 identifies Bromley as a restricted Borough in terms of the loss of industrial land, and sets a benchmark for the loss of 9 hectares between 2011 and 2031, an average loss of around 0.5 hectares per annum, and benchmark vacancy levels for industrial land and floorspace of 5% and 8% respectively (Point 3.7, pg 31).

To support a rigorous plan, monitor and manage approach to the Borough's industrial land and ensure an adequate supply and range of premises the Council has undertaken a review of all industrial land: Strategic Industrial Locations, Locally Significant Industrial Sites and non- designated land.

London Plan Policy 2.17 and associated Table A3.1 identifies the Footh Cray Business Area and St Mary Cray as Strategic Industrial Locations (SILs, sub-category Industrial Business Park) and requires boroughs to promote, manage and where appropriate, protect SILs.

To ensure there is sufficient industrial land to meet the needs of future businesses the Council has reviewed and updated the evidence regarding the existing industrial stock. This work is set out in the 'Local Plan Industrial Land and Premises Update 2015' which builds on the existing studies commissioned by the Council and supporting the London Plan. In particular, London's Industrial Land Baseline (URS 2010), London Borough of Bromley Retail, Office, Industry and Leisure Study (DTZ 2012), Planning for Growth in Bromley, Cray Business Corridor Study (2014) and finally Biggin Hill study (2015) (URS).

Methodology

The 2010 London Industrial land baseline (developed for the London Plan 2011) was the starting point. A desk based review, using the London Development Database (LDD), Valuation Office Agency (VOA), and local knowledge, supplemented by site visits identified and analysed changes since 2010.

The Council identified a loss of 2.5 hectares from industrial use between 2010 and the end of 2014, in line with the Greater London Authority's (GLA) benchmark for the Borough. In addition, through the analysis of industrial land the Council was able to calculate a total estimated industrial floorspace figure, using non-domestic rating information. The 2012 VOA floorspace figure for the Borough was used as a baseline to identify the estimated floorspace change and as well as vacancy levels.

The Council's SIL and LSIS areas were then assessed for their continued strategic and local significance The URS 'Planning for Growth Work' identified sites within the

Cray Business Corridor and the Biggin Hill SOLDC with potential capacity for intensification of floorspace and employment and contribution.

Potential new LSISs were identified through the review of non-designated land. The threshold for selection was a minimum site area of 0.15 (Ha) to provide sufficient Industrial and employment capacity to justify the designation. Criteria were developed from those set out in the Mayor's SPG Land for Industry and Transport 2012. Assessment of new LSISs was based on analysis from the Mayor's criteria for site allocations on industrial land, this included considerations for economic and land use conditions (Page 89).

Sites were selected for their accessibility, condition and level of occupancy.

Findings

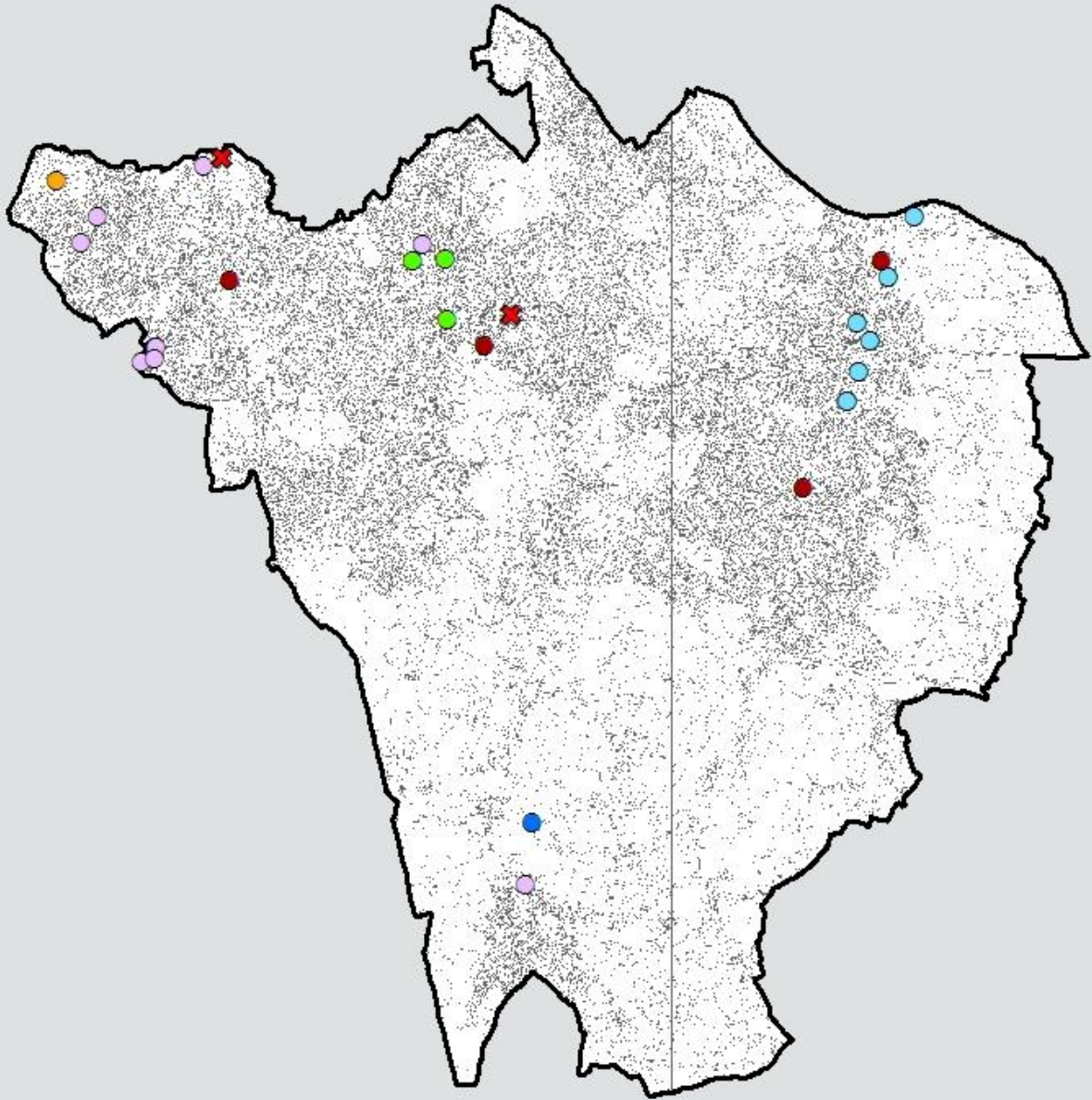
Analysis of the SIL highlighted Crayfields Business Park comprises predominately office uses, and therefore does not meet the SIL criteria, but still important to the functioning of the Cray Business Corridor it was assessed as a potential Key Office Cluster and is included under this new designation., The remainder of the SIL sites remain as in the DP &D.

The Borough is estimated to have 132.5 hectares of industrial land (Dec 2014), a loss of 2.5 hectares since 2010 in line with the Mayor's SPG Land for Industry and Transport (2012). The estimate for vacant industrial land is 4.95% and also within the 8% benchmark for vacant industrial land as set out by the Mayor.

Seven potential additional sites have been identified meeting the criteria developed for LSISs, totalling 3.5 hectares, 2.65% of the industrial land identified in Table 1.

Consultation Draft

Proposed Commercial Designations



Legend

- Strategic Industrial Locations
- Locally Significant Industrial Sites
- ✘ Locally Significant Industrial Sites (DP & D sites deleted)
- Biggin Hill Airport Strategic Outer London Development Centre
- Business Improvement Areas (BTCAAP)
- Key Office Clusters
- Crystal Palace Draft Strategic Outer London Development Centre



Table 1 Borough Industrial Land (ha) by proposed designation (and ward) 2015

Industrial Areas/ Ward	Total Site Area (ha)
Strategic Industrial Location (Cray Business Corridor) Total	52
Ruxley Corner (Footscray)- Cray Valley East	8.4
Crayfields (Footscray)- Cray Valley East	5.58
Sevenoaks (St Mary Cray)- Cray Valley East/West	38.25
LSIS Total	38
Elmers End- Kelsey and Eden Park	5.91
Lower Sydenham- Penge & Cator/ Copers Cope	18.17
Farwig- Plaistow and Sundridge	2.33
Oakfield Road- Penge & Cator	4.81
Biggin Hill- Darwin	7.2
New LSIS	3.5
The Beechwood Centre- Bromley Common & Keston	0.25
Enterprise House- Bromley Common & Keston	0.4
Bencewell Business Park- Bromley Common & Keston	0.4
Bromley Industrial Centre- Bromley Town	0.7
Kimberley Business Park- Darwin	0.5
Higham Hill Farm- Darwin	0.75
Franklin Industrial Park- Penge & Cator	0.38
Non Designated Industrial Land	39
Overall Total	132.5

Table 1 shows a breakdown of industrial land in the Borough.

Proposed New Draft Locally Significant Industrial Locations

The seven proposed new Locally Significant Industrial Locations, identified are set out with a summary of their scoring against the LSIS selection criteria.

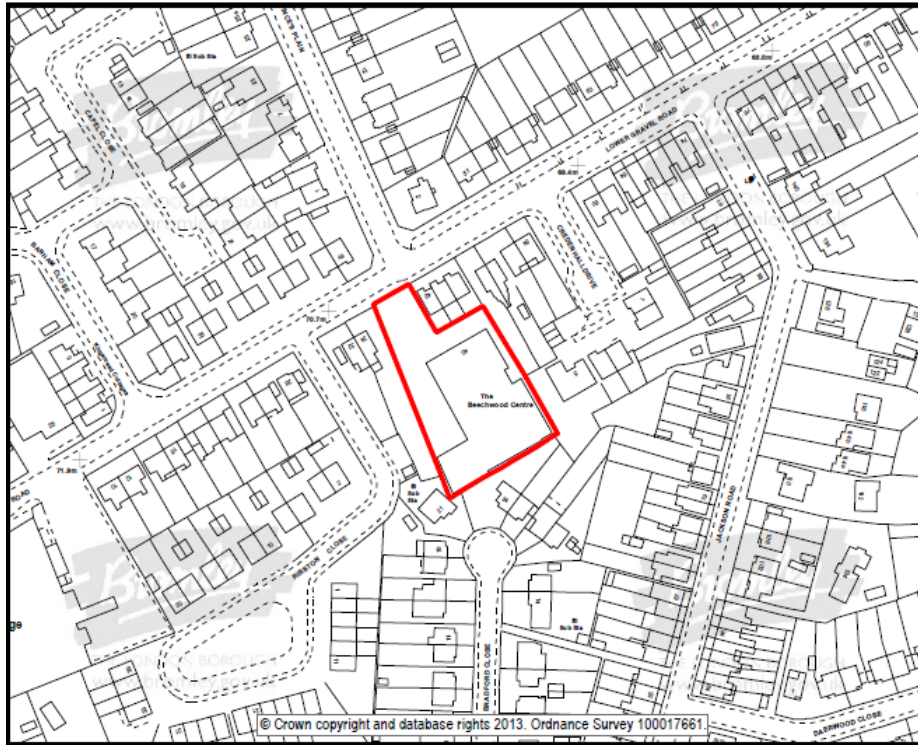
A summary of the selection process is included in the 'Local Plan – Industrial Land and Floorspace Update 2015'.

Proposed New Locally Significant Industrial Sites

Site 1- : The Beechwood Centre, 40 Lower Gravel Road Bromley BR2 8GP

Ward: Bromley & Keston

Size: 0.25 (Ha)

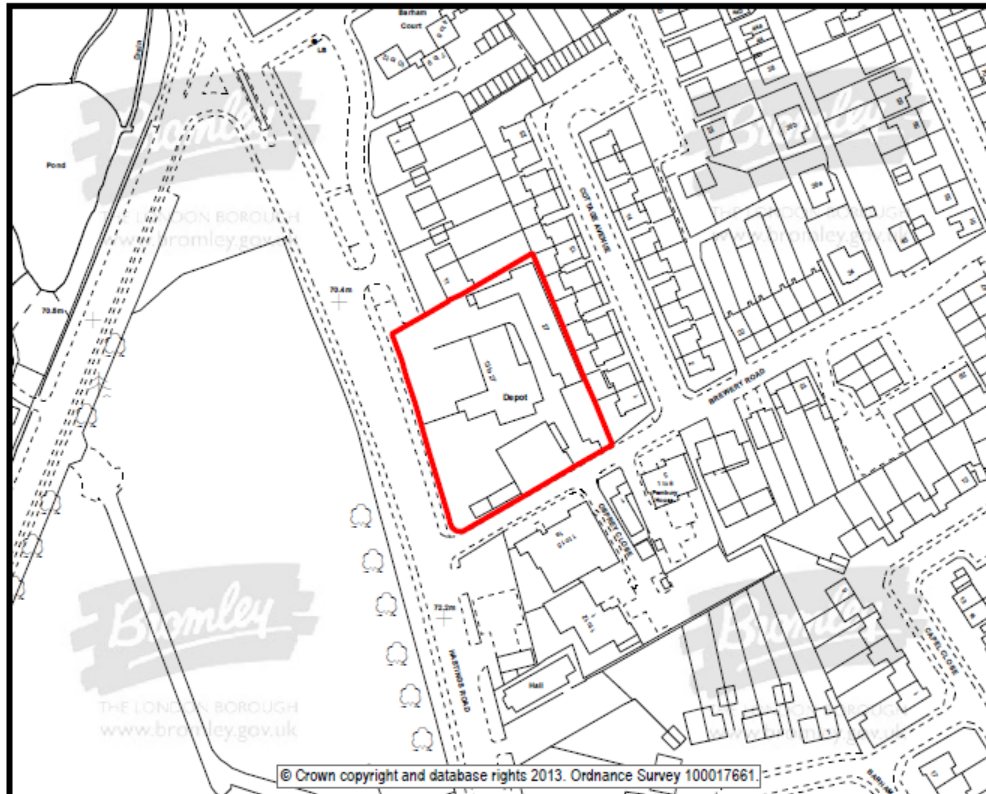


Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
2220	PV (Recently opened)	5	3	Business Units and Premises

Site 2: Enterprise House, 27 Hastings Road Bromley

Ward: Bromley Common & Keston

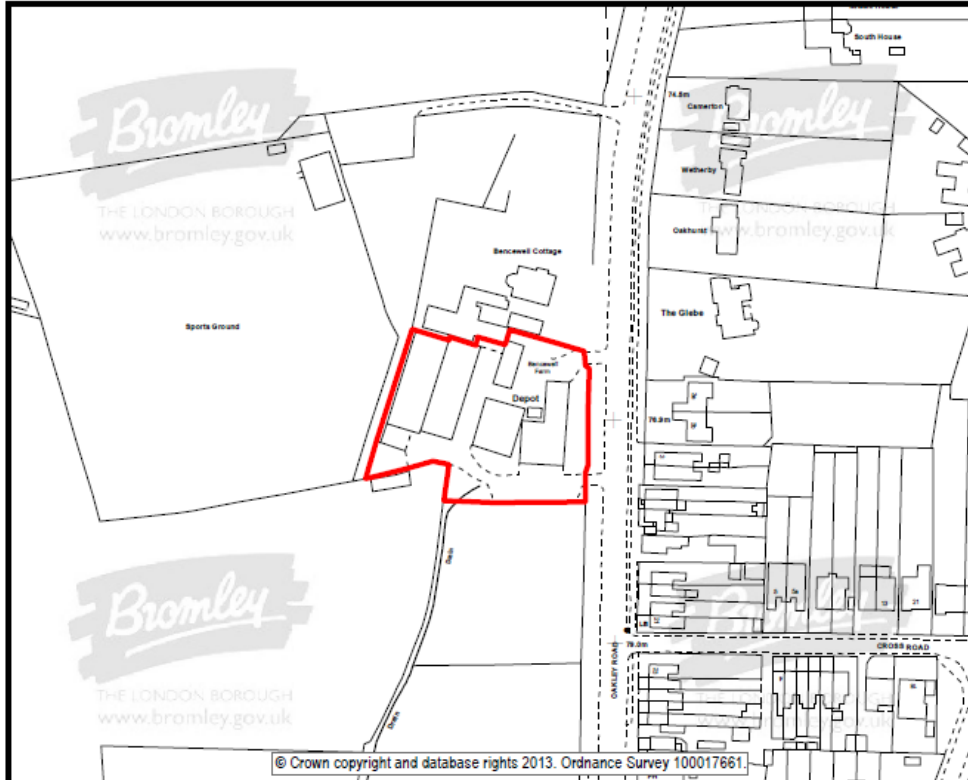
Size: 0.4 (Ha)



Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
2668	PV (6.74%)	3	5	Business Units and Premises

Site 3: Bencewell Business Park, Oakley Road Bromley
 Ward: Bromley Common & Keston

Size: 0.4 (Ha)

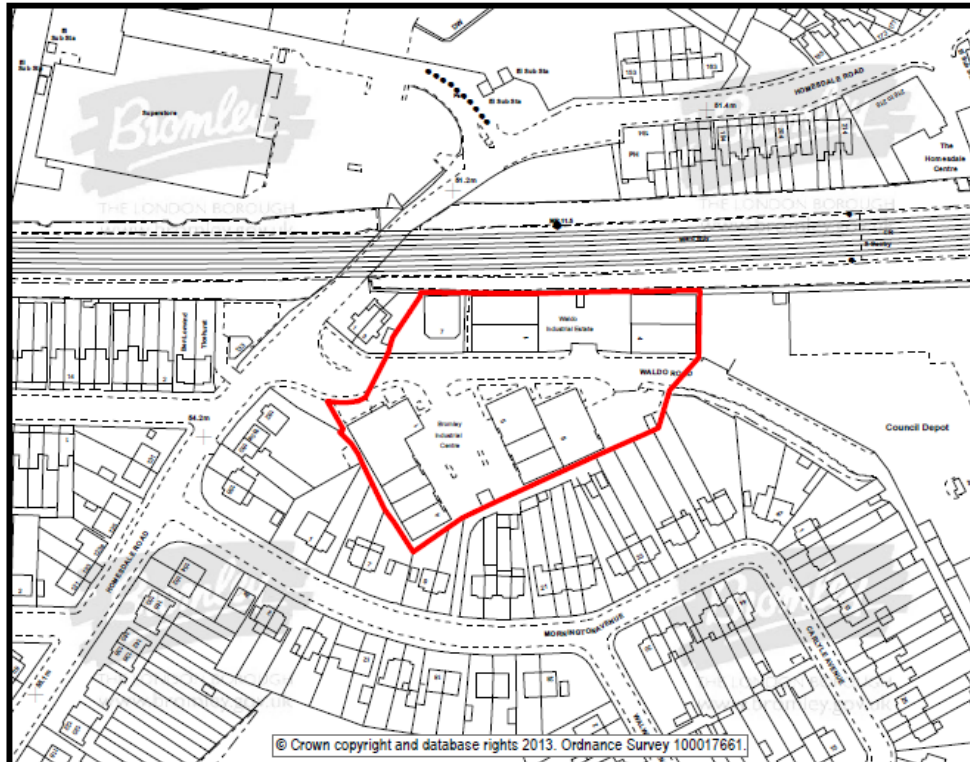


Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
2266	N (0%)	3	4	Industrial Units and Premises

Site 4: Bromley Industrial Centre, Waldo Road Bromley

Ward: Bromley Town

Size: 0.8 (Ha)

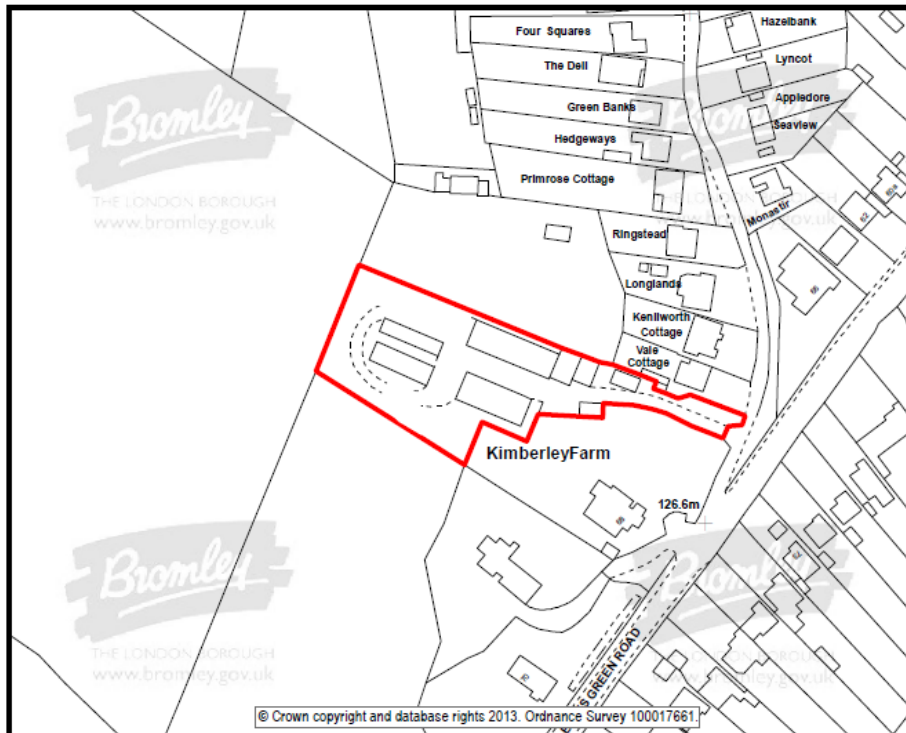


Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
2962	PV (15.46%)	4	4	Industrial Units and Premises

Site 5: Kimberley Business Park, Blackness Lane

Ward: Darwin

Size: 0.5 (Ha)

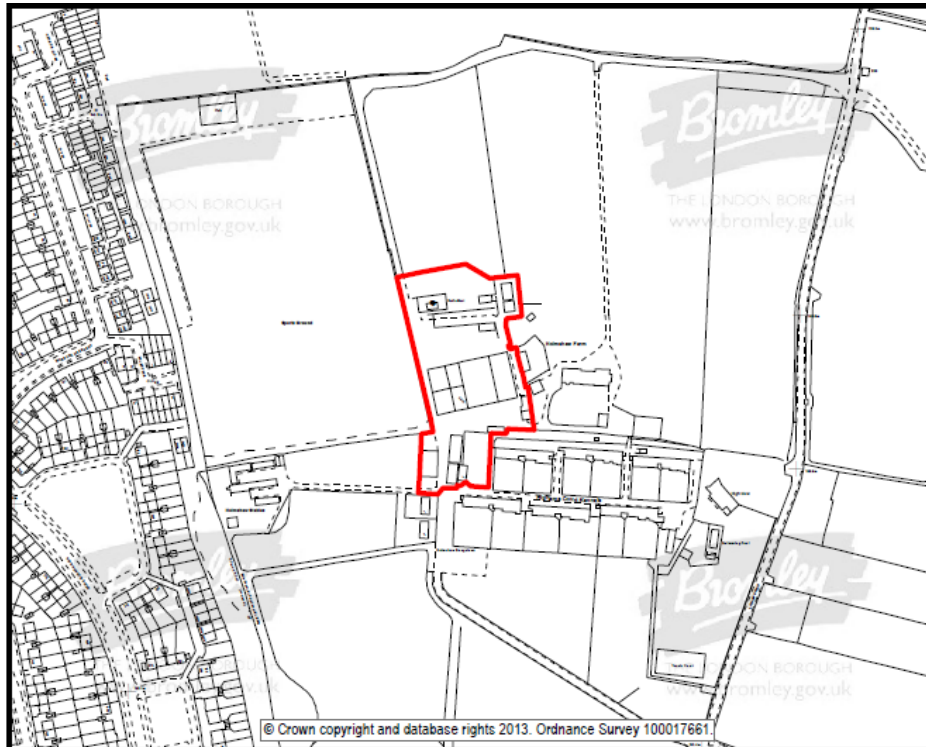


Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
881	PV (18.72%)	4	4	Industrial units and premises

Site 6: Higham Hill Farm, Layhams Road

Ward: Darwin

Size: 0.75 (Ha)

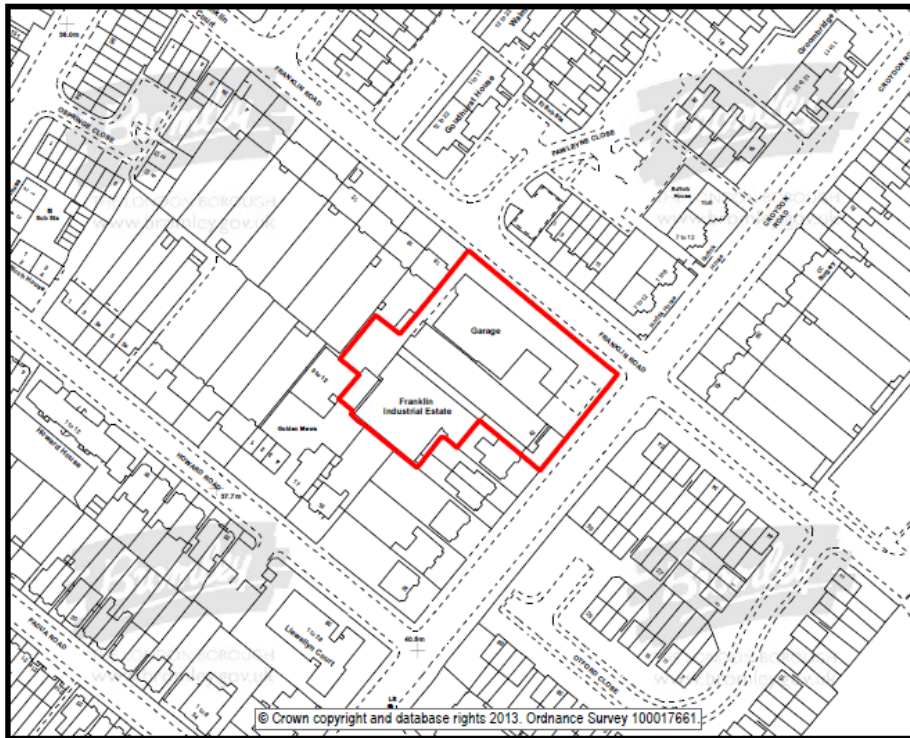


Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
4408	N (0%)	3	3	Industrial units and premises

Site 7: Franklin Industrial Centre, 20 Franklin Road SE20 8HW

Ward: Penge & Cator

Size: 0.38 (Ha)



Estimated Floorspace (sqm)	Vacant (Y/N & PV= Partially Vacant)	Condition (Rating 1-5)	Access (Rating 1-5)	Predominant Industrial Use
2441	PV (9.38%)	3	3	Industrial units and premises

Offices

Provision of modern good quality of offices is essential as office employment forms a key area of growth within the local economy. Pressures on office uses from higher value uses, and in particular from residential use, which in recent years has been facilitated by permitted development rights introduced by the Government in 2013 have contributed to the importance of the Council reviewing and monitoring the changes in office stock.

The forecast for office floorspace requirements in the Borough stated in the London Office Floorspace Projections (2014) range from 84,000 to 112,000sqm in addition to the 2011 VOA figure of 302,000 sqm of offices.

London Plan Policy 4.2 Offices encourages renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility, and seeks increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities.

Methodology

The July 2014 London Office Floorspace Projections (LOFP), produced for the GLA, is the most up to date report setting out office floorspace requirements for London and the individual boroughs. It acknowledges, and makes reference to other economic forecasts indicating growth above the GLA economic projections.

Table 4.2 from the report shows additional and total office floorspace required for the Borough using the London Plan projections and Borough baseline 2011 figure of 302,000sqm. The relevant section is reproduced below:

The London Office Policy Review (LOPR) in 2012 identified 12,000sqm of offices completed in Bromley between 2002-2006, but an overall reduction in office stock between 2000-2012 (12-13%). It uses a baseline of 334,000sqm (2010) of office floorspace in the Borough, which is updated in the 2014 LOFP to a lower figure of 302,000sqm. It also indicates a pipeline of 23,474sqm (2012) of office floorspace.

Table: Forecast of Future Total and Additional Office Floorspace Requirements
Source Table 4.2 (London Office Floorspace Projections 2014) Higher Stock Efficiency

2011		2036	2011-2036	2036	2011-2036
		9 sqm		12sqm	
Bromley	302,000	386,000	84,000	414,000	112,000

84,000-112,000sqm of office floorspace is estimated to be required between 2011-2036, depending on the employment density assumptions.

Table 2: Estimated office floorspace Figures 2012 - 2014

2012	295,000
2014	279,000*

*includes approximately 16,000sqm lost to residential through PDR 2013-2015. A further 21,000sqm has prior approval for change of use from office to residential. This gives the 2014 floorspace figure a revised total of 242,000sqm

The Retail, Office, Industry and Leisure Study Report DTZ 2012 assess the contribution to supply that could be made from sources other than sites that are designated under current planning policy. These, for instance, could include smaller and/or scattered employment sites.

DTZ also highlighted existing office properties, such as those on Knoll Rise, that are of sufficiently good quality to meet current and future market requirements and are fit for purpose, should be retained. These recommendations are reflected in the proposed safeguarding Key Office Cluster sites.

Research was undertaken using the latest individual Business Rates from the VOA, and selected information from Non Principle Private Residence (NPPR) Business Rates Data. The Council's mapping and planning databases were also used. The impact of the permitted development rights to change from office (Use Class B1a) to residential use introduced by the Government has been assessed.

Table 3 shows the floorspace given approval given, and implemented, under the Town and Country Planning (General Permitted Development Order 1995), now replaced by the 2015 GPDO for change of use to residential use.

Table 3: Prior Approval for Change of use to Residential 2013-2015

	Approved (Residential)		Commenced (Residential)	
	Floorspace (SqM)	Units	Floorspace (SqM)	Units
2013/2014	17,000	250	9,730	156
2014/2015	20,000	389	6,430	139

Since May 2013, approximately 37,000sqm of office floorspace across the Borough has been approved for change of use from office to residential.

The London Office Floorspace Projections (LOFP) paper from the Greater London Authority (GLA) states that the Borough, on average, will incur an average loss of 4,000sqm between 2011-36. Only taking PD into account, Bromley is already exceeding this figure by over 200%. Protection needs to be put in place to ensure that there is growth of adequate stock in the Borough.

The distribution of offices across the Borough was analysed to identify clusters of sufficient quality. In order to ensure adequate provision is made, criteria based on accessibility, total floorspace, vacancy level, and age have been used to assess prospective sites.

Findings

Desk-based site assessments highlighted office clusters with floorspace exceeding 1,500sqm for detailed investigation.

This figure has been used as a threshold for sites due to their contributions to overall stock, employment capacity and opportunities. Stand-alone office developments matching the floorspace threshold have been selected over individual small office accommodation above retail units. Although some of these clusters of small, more ad hoc office space did amount to over 1000sqm, they are not considered significant.

From the initial study, there has been significant loss of office space, with the trend expected to continue through PDR and natural loss. In line with the DTZ report, and the need to retain good office stock, four draft potential Key Office Clusters have been identified.

Knoll Rise and Masons Hill have PTAL ratings of 4/5, meaning they have easy access to London Distributor Roads, Strategic Routes, and public transport. Their proximity to key transport links provides expansive reach to these locations from across the Borough, and Orpington's designation as a Major Town Centre provides additional attraction to the existing office space.

Beckenham High Street and Crayfield Business Centre have been identified as strong Key Locations. This reflects their significant size and access to transport facilities as well as taking into consideration their existing designations. Crayfield Business Centre cluster also lies within the designated SIL. Consideration needs to be given as to whether a Key Office Cluster would be preferable designation rather than SIL.

In reviewing the changes and the remaining office stock clusters, good quality offices were identified as key to the Borough in terms of their size, quality and location. Clusters considered able to offer a range of good quality office and employment and services to different parts of the Borough. A draft policy to safeguard these clusters to ensure continued good quality office space is available for the Local Plan period is also proposed.

Three of the office clusters are in local town centres and the fourth forms part of the strategically important Cray Business Corridor. Planning policy at national, regional, and local levels seek to protect and enhance the vitality and viability of Town Centres and High Streets and to ensure the LPA plan positively to meet the needs of business.

Table 4: Proposed Key Office Cluster Breakdown (SqM)

Potential Cluster	Total Floorspace	Vacant Floorspace	Percentage Vacant
Beckenham High Street	2651	0	0.00%
Crayfield Business Park	7753	258	3.33%
Knoll Rise	6173	509	8.25%
Masons Hill	7034	148	2.10%

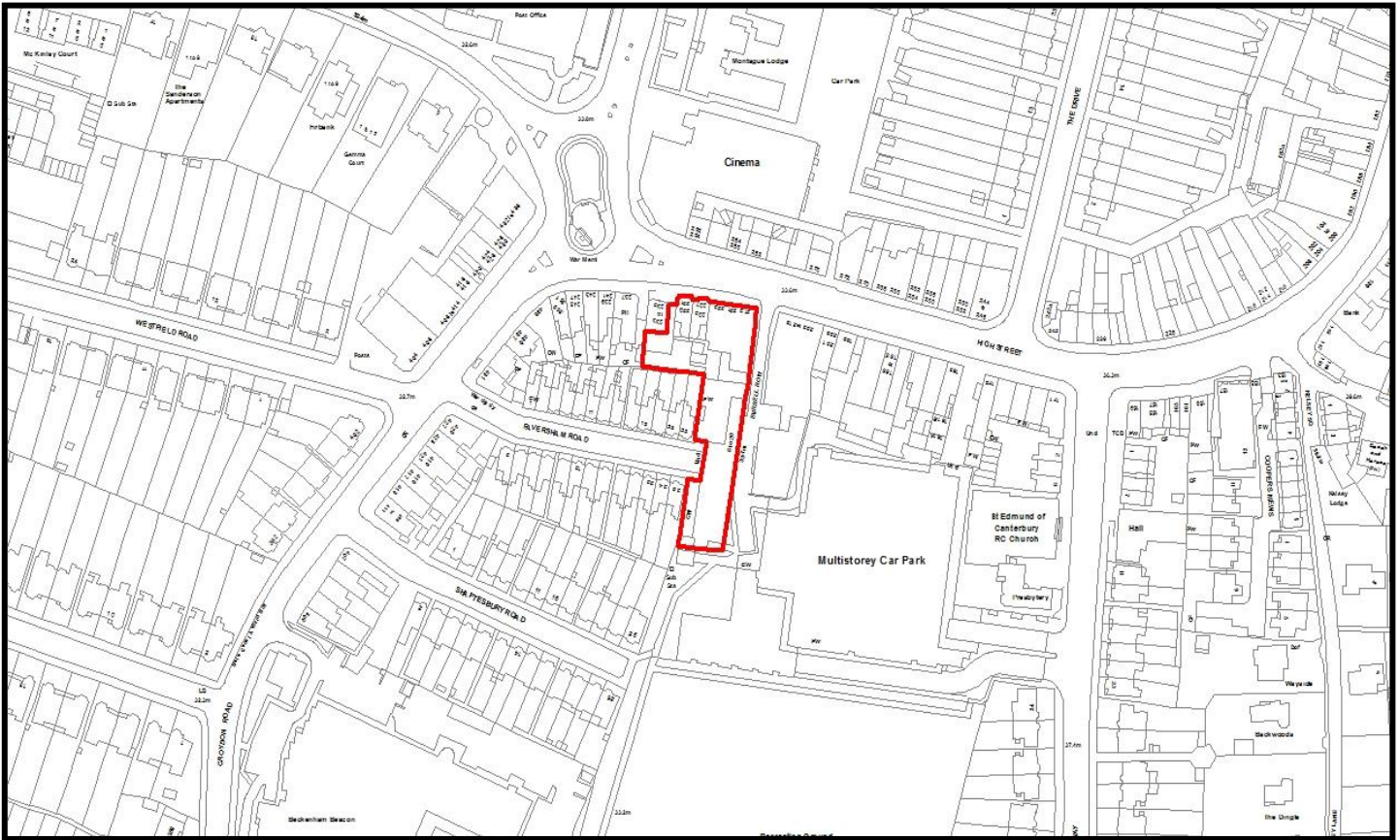
30396	1150
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The proposed Key Office Clusters comprise an estimated 11.8% of the Borough's current office stock and are considered important in maintaining an adequate provision of good quality, purpose built office space.

DRAFT

Proposed Draft Key Cluster Beckenham High Street, Beckenham

Ward: Copers Cope



This cluster is made up of five commercial units. The combined office floorspace totals approximately 2,651sqm.

The breakdown of office units within the cluster (from left) is as follows:

Address 1	Address 2	Floorspace (SqM)	Vacant
Hicklin House	R/O 233-235 High Street	267	N
	225-231 High Street	227	N
Marqueen House	215-223 High Street	669	N
Ironstone House	6/20 Burrell Row	675	N
Provident House	6/20 Burrell Row	813	N

Proposed Draft Key Cluster Crayfield Business Park, Crayfields

Ward: Cray Valley West



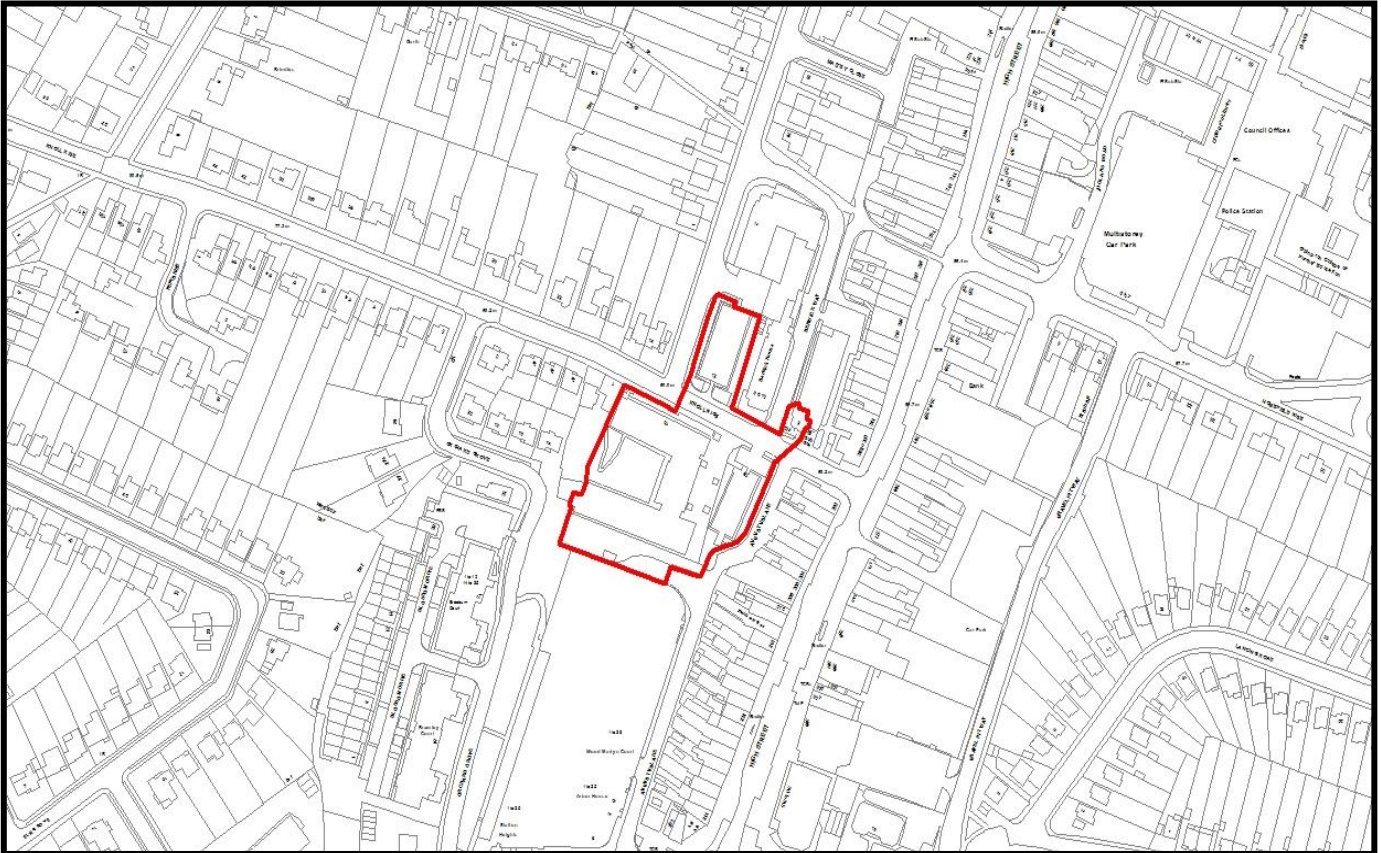
This cluster is made up of five commercial units. The combined office floorspace totals approximately 7,753sqm.

The breakdown of office units within the cluster (from left) is as follows:

Address 1	Address 2	Floorspace (SqM)	Vacant
Swan House	New Mill Road	1020	N
Osprey House	New Mill Road	1081	N
Kingfisher House	New Mill Road	1304	Part
Enso House	3 New Mill Road	3058	N
Riverside House	1 New Mill Road	1290	N

Proposed Draft Key Cluster Knoll Rise, Orpington

Ward: Orpington



This cluster is made up of four commercial units. The combined office floorspace totals approximately 6,173sqm.

The breakdown of office units within the cluster (from left) is as follows:

Address 1	Address 2	Floorspace (SqM)	Vacant
St John's House	1a Knoll Rise	798	N
Valiant House	12 Knoll Rise	777	N
	1b Knoll Rise	4346	Part
Vinson Close	2 Knoll Rise	252	N

Proposed Draft Key Cluster Masons Hill, Bromley

Ward: Bromley Town Centre



This cluster is made up of ten commercial units. The combined office floorspace totals approximately 7,034sqm.

The breakdown of office units within the cluster (from left) is as follows:

Address 1	Address 2	Floorspace (SqM)	Vacant
Linden House	153-155 Masons Hill	1712	N
Maple House	157-159 Masons Hill	2440	N
1 Cobden Court	Wimpole Close	148	Part
2 Cobden Court	Wimpole Close	150	N
3 Cobden Court	Wimpole Close	171	N
4 Cobden Court	Wimpole Close	146	Part
5 Cobden Court	Wimpole Close	84	N
6 Cobden Court	Wimpole Close	93	N
	17 Homesdale Road	1010	N
Prospect House	19-21 Homesdale Road	1080	N

PROPOSED NEW POLICY DESIGNATION CONSULTATION

New Policy Designation: Key Office Clusters (KOCs)

The Council seeks to retain an adequate stock of good quality office floorspace to meet the forecast employment growth for the Borough.

The offices and sites in the following locations, defined as Key Office Clusters (KOCs) on the policies map, will be safeguarded for office use:

- i. Beckenham High Street
- ii. Crayfield Business Park, The Crays
- iii.. Knoll Rise, Orpington Town Centre
- iv. Masons Hill, Bromley Town Centre

Supporting Text

The pressure on offices for other uses is recognised in Policy 4.2 of the London Plan, where boroughs are encouraged to monitor the impacts of Permitted Development Rights (PDR), and where appropriate protect, renew and modernise existing office stock in viable locations to improve quality and flexibility.

There has been significant loss of office space within the Borough, with the trend expected to continue. It is important to ensure an adequate supply of good quality office accommodation is retained to accommodate new and existing business and plan for the forecast employment growth over the Plan period.

Office clusters comprising of good quality office were identified as Key to the Borough in terms of their size, quality and location. The clusters proposed are considered able to offer a range of good quality office and employment services to different parts of the Borough.

Three of the office clusters are in local town centres and the fourth forms part of the strategically important Cray Business Corridor. Planning policy at national, regional, and local levels seek to protect and enhance the vitality and viability of Town Centres and High Streets and to ensure the Council plans positively to meet the needs of business.

Biggin Hill Strategic Outer London Development Centre

Introduction

Biggin Hill is one of the three strategic areas the Council has identified for economic growth in the Borough.

The London Plan Policy 2.16 Strategic Outer London Development Centres (SOLDC) and the Mayor's SPG Town Centres and Strategic Outer London Development Centres identifies Biggin Hill as an area of more than sub-regional importance for the cluster of, aviation related and high technology businesses.

The Strategic Outer London Development Centre status of Biggin Hill offers the potential for increased support of economic growth activities at Biggin Hill Airport and the adjoining industrial area.

The SPG includes the following implementation guidelines:

- “Strategic function in ‘other Transport Related Functions’ as an important sub-regional hub for aviation and related high-tech industry Develop a positive planning framework to support economic growth activities at Biggin Hill Airport and the adjoining industrial area
- Enhance environmental performance of the airport in line with London Plan Policy 6.6
- Review appropriate constraints through the local plan process including accessibility, Green Belt (London Plan Policy 7.16) and heritage designations whilst maintaining environmental quality
- Support partnership working with education and training providers related to aviation and high-tech industry”.

National Context

In line with the NPPF the Council is seeking to plan positively to meet the development needs and requirements of business to support an economy fit for the 21st century. The Local Plan is addressing barriers to investment by setting out the policy framework for the Biggin Hill SOLDC.

The ‘Planning for Growth in Bromley – Biggin Hill Study’ (AECOM Feb 2015) made a series of policy recommendations to the Council. Several of these had already been taken forward by the Council in the Draft Policies and Designations Document (DP&D) (2014).

The DP&D included a proposed boundary for the Biggin Hill SOLDC, which is unchanged in this document -together with Draft Policies 9.9 - 9.12 (inclusive). These relate to the SOLDC, and the individual parts of the SOLDC: West Camp, East Camp and South Camp with the Biggin Hill Industrial Area, a proposed Locally Strategic Industrial Location.

The DP&D identified the need to review the constraints on economic growth, and assess these, whilst maintaining environmental quality and minimising detrimental impacts on adjoining areas.

The concept plan prepared by Nathaniel Litchfield Partnership (NLP), on behalf of the Biggin Hill/ Locate Initiative, focuses on the growth of existing businesses; 'inside out' growth, attracting other aviation and high tech businesses to the area creating around 3,000 jobs over 15-20 years. The majority of the growth is forecast to be hangar type accommodation for servicing and maintenance of aircraft, and also business park office and light industrial units. The approach is based on the airport playing three specific roles: (1) as a location for business aviation aircraft owners to be based at; (2) business aviation users to fly in and out; and (3) for business aircraft manufacturers to base their service centres at Biggin Hill.

NPL have confirmed that in implementing the proposals outlined in the concept plan the Airport would continue to operate within the existing UDP noise contours and noise envelope referred to in the UDP policy BH8 'Noise Sensitive Development.'

The Council commissioned URS (now AECOM) to undertake the Planning for Growth Work study, which followed GL Hearn's recommendation to the Council for a three pronged economic growth strategy focusing on Biggin Hill, the Cray Business Corridor and Bromley Town Centre. URS reviewed the growth forecasts from NLP comparing these with historic trends at Biggin Hill and a range of employment forecasts for the Borough and surveys of existing Biggin Hill businesses indicating growth of over 40/50%. URS advised that 'A reasonable argument for growth potential is presented. [] and an argument that constrained capacity in competing locations will drive demand at the airport. The policy constraints which limit growth are seen as one of the challenges for realising the potential growth at Biggin Hill'.

To provide a more detailed understanding of the potential for addressing the constraints and enabling the ambitions for the SOLDC to be achieved and the economic role and contribution of the SOLDC as envisaged in the Local Plan (vision and objectives) while protecting environmental quality the Council commissioned AECOM to undertake a more detailed assessment on the Green Belt/openness, landscape quality and the aviation and non-aviation ambitions of the Locate Partnership's concept plan and the SOLDC potential.

This work included 'Theoretical Zones of Visibility' assessing the impact of the scale and size of development identified by NLP. This work highlighted that East Camp is very sensitive to development, but that other parts of the SOLDC could

accommodate further development with employment growth in line with the SOLDC designation whilst minimising detrimental impacts on the environment.

Options for amending the Green Belt boundary to increase investor confidence and help achieve the employment ambitions, and support the SOLDC designation were identified.

The Council is mindful of the ambitious nature of the NLP concept plan, and the balance between economic, social and environmental roles. The proposal is to consult on the SOLDC boundary as in the DP&D with amendment to the Green Belt boundary, with West Camp, the Terminal Area and the area East of South Camp being removed from Green Belt.

At this stage two additional area based designations are proposed for the 'Terminal Area' and the area 'East of South Camp' which identify the areas for aviation employment generating uses and the potential floorspace capacity.

Appendix X sets out the floorspace analysis undertaken by AECOM using NLP's working draft concept plan for the Biggin Hill SOLDC. It then shows the potential capacity identified by AECOM which may be appropriate for each land parcel on the basis of the landscape and visual impact work. This used likely building heights and sizes provided by NLP.

While the amendments to the Green Belt are unlikely to accommodate all the floorspace within NLP's concept plan the Council considers that it provides a positive framework of the SOLDC designation and economic growth, and a Green Belt boundary which is capable of enduring beyond the Plan period.

New Draft Policy East of South Camp

Expansion of the Biggin Hill SOLDC will be permitted in the area East of South Camp. Development proposals for the area east of South Camp will be restricted to aviation related employment generating development. This location is not considered appropriate for non-airport related development but could be used for replacement or relocated flying club buildings, aircraft parking and maintenance and similar aviation facilities.

Potential floorspace capacity could be up to 26,200 sqm depending on the detailed siting, massing and design of buildings.

Supporting Text

This area has been identified as important to the relocation of airport and aviation uses on the airside part of South Camp to enable their redevelopment to provide modern space for aviation related uses, in particular hangars and facilities for Original Equipment Manufacturers (OEMs), Aircraft Operating Companies (AOCs)/Fixed Base Operators (FBOs). This will necessitate the release of Green

Belt at the SOLDC and provide confidence to inward investors and existing businesses.

There is potential capacity of up to 26,200 sqm depending on the siting, scale and design of the buildings, while minimising the impact on the landscape and visual amenity.

New Draft Policy C Terminal Area

Expansion of the Biggin Hill SOLDC will be permitted in the area north of the existing terminal building. Development proposals for the Terminal Areas will be restricted to aviation related employment generating development. This location is not considered appropriate for non-airport related development. Potential floorspace capacity could be up to 8,100 sq metre dependent on the detailed siting, massing, and design of buildings.

Supporting Text

The control tower and terminal building are the focus for passenger and goods handling and other ancillary facilities including distribution services, administrative offices, short and long-stay parking for cars, coaches and aircraft.

There is potential capacity of up to 8,100 sqm of floorspace depending on the siting, scale and design of the buildings, while minimising the impact on the landscape and visual amenity.

Green Belt amendments

The majority of the SOLDC lies within the Green Belt and under the existing UDP is identified as two major developed sites within the Green Belt (area 1 covering West Camp and the Terminal Area and area 2 covering East Camp). The current policy approach only allows for infilling and redevelopment in accordance with the NPPF, the London Plan and the Council's Green Belt policies. It is recognised that the 'infill' approach set out in the NPPF would not generate the level of economic growth required to contribute to the Borough's prosperity over the plan period. Similarly the current approach would be misaligned with regional policy and guidance contained in the London Plan and the Mayor's Town Centre SPG and national policy and guidance.

The Government's General Aviation Strategy highlights the specific difficulties that aerodromes face where Green Belt washes over sites. The vision, aims and commitments from Government are geared toward ensuring the UK is the best place in the world for GA as a flourishing, wealth generating and job producing sector of the economy. Revisions to the National Planning Practice Guidance state that Councils should work with airport stakeholders (in plan making) to allow aviation to continue making a significant contribution to economic growth, as per the guidance in the Aviation Policy Framework. To this end the new guidance states that airports

can be put forward for mixed use development that includes continuing, adapting or restoring aviation services in addition to other uses. The Government's Aviation Policy Framework (AVF) requires Local Plans to have regard to policies in the AVF. The AVF recognises the importance of developing local strategies for airports to maximise the catalytic effects of airports to attract business and support growth. The AVF calls on local authorities, to utilise the range of tools at their disposal to help support businesses in the vicinity of airports. It also emphasises the need to maintain a viable network of business aviation. These national and regional aims align with Bromley's vision and objectives for the coming plan period.

The Council is encouraging the economic growth of the Biggin Hill SOLDC and accepts that without any amendment to the Green Belt the potential for investment is unlikely to be achieved. The uncertainty for potential investors and businesses, in a sector where there are options for location in other countries with more positive planning frameworks, creates uncertainty and deters businesses from locating in the UK. The AECOM work considered the options for releasing Green Belt land within the SOLDC, assessing the impact on the landscape character and visual impact, identifying possible areas most suitable for future expansion

The preparation of the Local Plan provides the opportunity to have a positive and plan led approach to the growth within the SOLDC. Work commissioned by the Locate initiative, identified the economic growth as being generated primarily from existing businesses and inward investment from aviation related businesses in the short-medium term, and longer term from non-aviation related businesses.

The AECOM work reviewed the potential capacity of the different parcels of land. The assessment recognised that maintaining the quality of environment is an equally important influencing factor, and as such minimising any detrimental impacts (e.g. to the openness of adjoining Green Belt and the quality and character of the landscape) would also need to factor into recommendations made to the Borough. The study considered a number of options for removing the different parcels of land from the Green Belt (including all the main parcels, excluding the airfield).

AECOM assessed the growth plan prepared by Nathaniel Lichfield and Partners (July 2014) on behalf of the Locate Partnership which identified growth potential over the next 15-21 years for the SOLDC could be as much as 3,000 new jobs. AECOM concluded that while this is ambitious the methodology used was reasonable and there is evidence of airside development demand from aircraft servicing businesses with non-airside sites more likely to play a longer term role once a critical mass has been achieved at the airport. The NLP have confirmed that the growth proposals can be accommodated within the existing noise contours and policy in the UDP BH8.

East Camp, is identified as a highly sensitive part of the SOLDC, with the adjacent Sites of Importance for Nature Conservation (SINC) lying partly within it, and also

being the area where built development is assessed as having the greatest visual impact on the characteristics of openness and landscape quality and adjoining areas. The previous 'Planning for Growth' study also questioned the demand for facilities in this area during the plan period. However, the AECOM study does recommend the removal of East of South Camp, West Camp and Terminal area (incorporating an expansion in the Terminal Area)

.Proposed Amendment to Green Belt within the Biggin Hill SOLDC

The Council proposes to amend the Green Belt boundary at Biggin Hill SOLDC as shown on Map x to provide a positive planning framework for the economic growth to support the SOLDC designation while protecting the environmental and landscape quality of the wider area.

(Map with areas marked)

Justification

Biggin Hill Strategic Outer London Development Centre is one of three strategic areas for economic growth in the Borough. The proposed amendment to the Green Belt is justified on the basis of exceptional circumstances, to support the provision of up to 3,000 jobs, including a range of high skilled employment. The amendment will provide the positive planning framework as required by the NPPF, the London Plan, and Bromley's vision and objectives for the SOLDC. The proposed removal of Green Belt is based upon a robust defensible boundary as required by the NPPF, with the road to the west of the terminal area and West Camp representing the western edge, the area where the Airport's fire station marks out the Terminals' northern extent. For the area East of South Camp the airfield property boundary to the south east provides a clear demarcation in character between the Airfield and the Biggin Hill Town / Berry's Green Fringe. The northern extent of the East of South Camp area is marked by the existing woodland / southern boundary of the Cudham Wood SINC.

The Green Belt boundary amendments (shown above) have been subject to detailed analysis of the five Green Belt purposes. The parcels put forward for removal were found to make a limited contribution to the Green Belt. The AECOM study (and Airport's own representations) outlined a number of arguments for exceptional circumstances¹ based upon informed independent professional judgements. The recommendations made by our consultants have subsequently been considered by planning officers in order to assess the case for exceptional circumstances in the context of the Local Plan's vision and objectives and evidence for need. We concur with AECOM's recommendations and have put forward amendments that would provide sufficient land for the plan period having regard to the intended permanence, of Green Belt, in the long term, so that they Green Belt boundaries around the

¹ The legal requirements and professional judgements made to justify for Green Belt boundary amendments are strictly set out in the law and national policy/guidance.

SOLDC are capable of enduring beyond the plan period. The revisions put forward take account of the need to promote sustainable patterns of development..

The proposed Biggin Hill SOLDC boundary encompasses 209 hectares of land of which 190.78 hectares are designated Green Belt in the 2006 UDP.

It is proposed to amend the Green Belt boundary to remove West Camp, the Terminal Area and the area East of South Camp from Green Belt designation. This comprises an area of 29.9 hectares.

The proposed SOLDC Area totals 209 hectares (of which 79.1ha will remain as Green Belt). 29.9ha represents an approximate 14% loss of the Green Belt within the SOLDC. Based upon the Locate Partnership concept plan this may be capable of accommodating 47,500m² of net new/refurbished commercial floorspace (excluding elements of the concept plan that envisaged a higher density of development in East Camp).

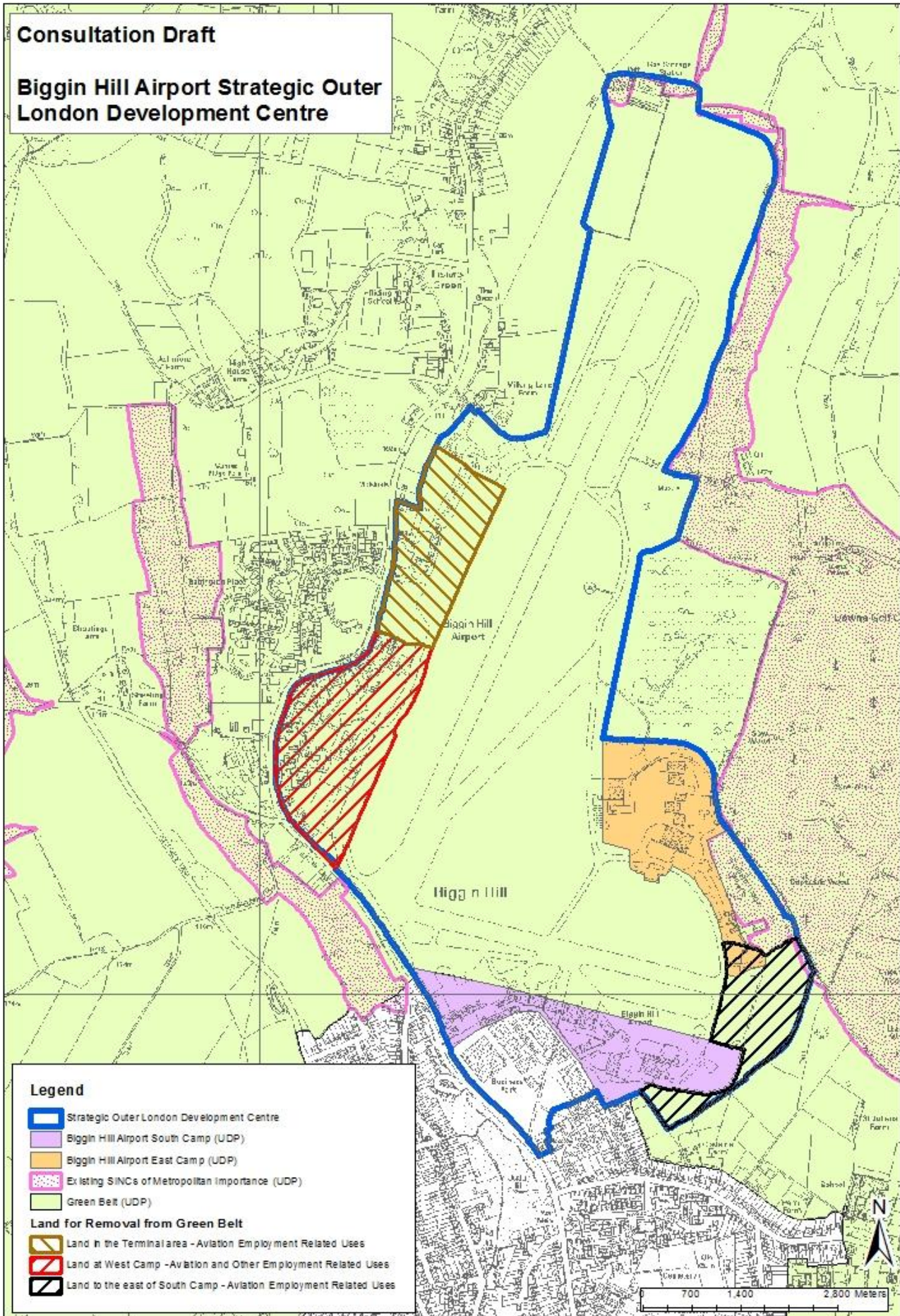
Exceptional circumstances justifying the amendments to the Green Belt exist on the basis that the existing Green Belt boundaries would not allow the full and proper functioning of the Biggin Hill SOLDC and would be in variance with the Mayor's London Plan and implementation guidelines for the SOLDC contained in the Town Centres SPG. In addition, national policy and guidance calls on Local Authorities to provide a positive planning framework for airports and business aviation as highlighted in the NPPF, NPPG, General Aviation Strategy and Aviation Policy Framework. The SOLDC offers the potential for an estimated 3,000 jobs, and for economic growth which could not be accommodated elsewhere within the Borough or an adjoining borough. The Biggin Hill SOLDC is identified as a strategic growth area within the spatial strategy for the Local Plan.

The case for changes to Green Belt exists where the development requirement exceeds what can be satisfactorily and confidently delivered within the urban area, and green field land will be needed, some of which is Green Belt. This need constitutes 'exceptional circumstances'. Exceptional circumstances exist to review and amend the Green Belt at Biggin Hill because:

- A pressing need for development and realising the potential of the SOLDC exists;
- The inability to meet this need under existing Green Belt policy;
- The absence of alternative non-Green Belt locations in Bromley or London's other airports;
- The significant economic benefits to Bromley and the wider economy of development.

Consultation Draft

Biggin Hill Airport Strategic Outer London Development Centre



Legend

Strategic Outer London Development Centre

Biggin Hill Airport South Camp (UDP)

Biggin Hill Airport East Camp (UDP)

Existing SINC of Metropolitan Importance (UDP)

Green Belt (UDP)

Land for Removal from Green Belt

Land in the Terminal area - Aviation Employment Related Uses

Land at West Camp - Aviation and Other Employment Related Uses

Land to the east of South Camp - Aviation Employment Related Uses

Crystal Palace Strategic Outer London Development Centre (SOLDC)

Planning Context

The London Plan (2015) Policy 2.16 identifies Crystal Palace as a potential Strategic Outer London Development Centre (SOLDC) with specialist strengths already or with the potential to function above the subregional level and to generate growth above the above Outer London trend without competing against existing town or other centres.

The specialist strengths identified for the Crystal Palace SOLDC in Table 2.1 of the London Plan lie in its existing and potential Leisure, tourism, arts, culture and sports functions.

The potential of SOLDCs to develop and build on its specialist strengths is meant to be explored and taken forward through partnership working between the Mayor, Local authorities and other stakeholders.

Draft Crystal Palace SOLDC boundary definition rationale

The Council has had discussions with neighbouring boroughs and with the Greater London Authority in late 2014 and early 2015 in relation to defining a sensible boundary for the Crystal Palace Strategic Outer London Development Centre.

The boundary was drawn tightly around the Crystal Palace Park to reflect the location of the strategic assets of more than subregional importance which already generate or could potentially generate growth above the outer London trend within the Crystal Palace area.

The GLA's Town Centres Supplementary Planning Guidance (July 2014) identifies potential criteria for identifying SOLDCs in table 7.2 and provides guidance regarding their implementation. The criteria helped identify the locations listed as potential SOLDCs in the 2011 version of London Plan, which did not include Crystal Palace.

As Crystal Palace is proposed as a SOLDC within the 2015 version of the London Plan, Bromley assessed it as defined by the extent of its proposed boundary against the proposed criteria to identify the potential of the area to function as such.

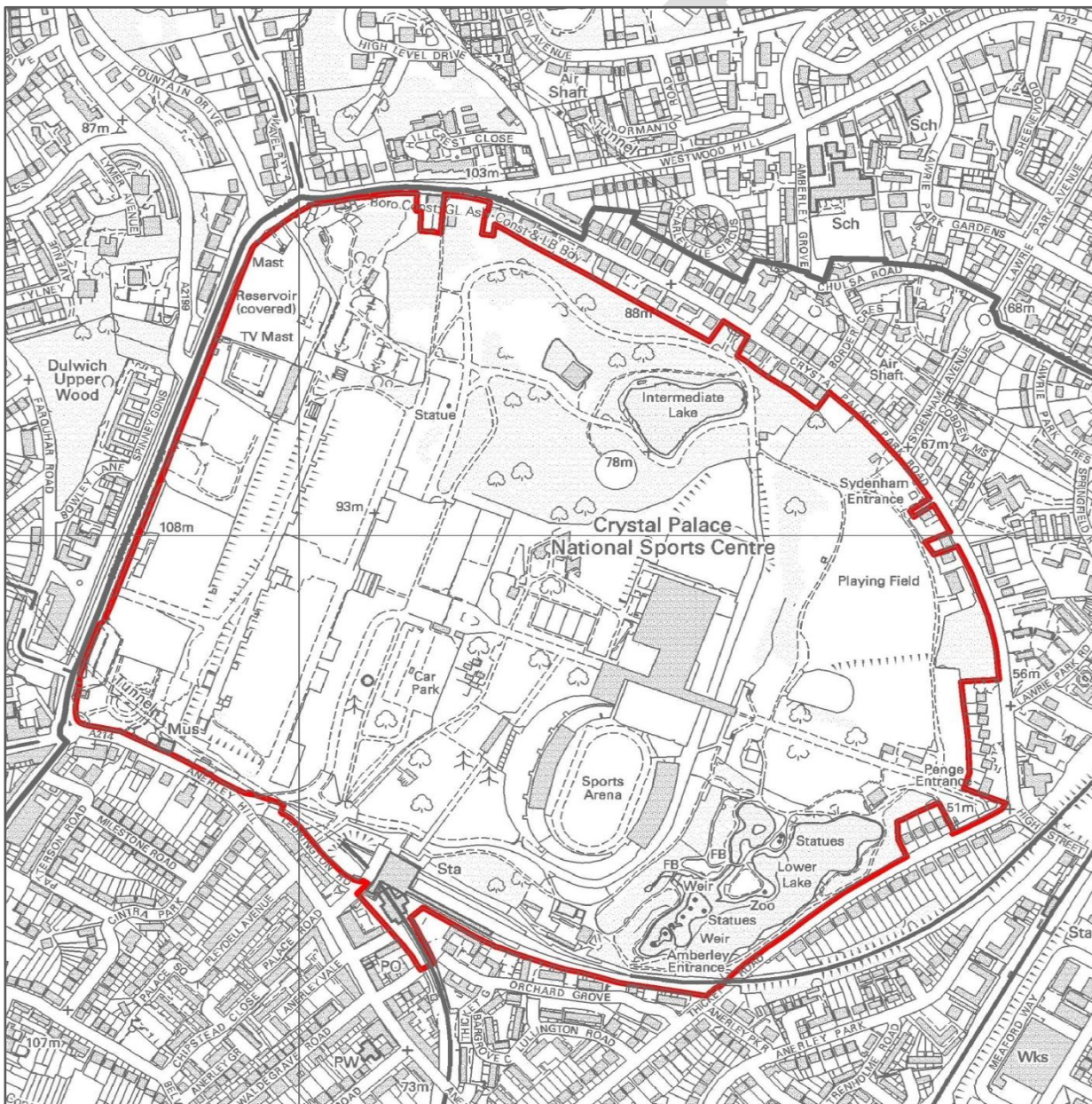
Note: *A link will be included here within this paper to the evidence base report which shows the SOLDC's assessment of the boundary against the criteria.*

The assessment shows that the proposed area boundary mostly meets the proposed criteria for designation although the Council acknowledges that the development potential of sites within the proposed SOLDC is constrained by its designation as Metropolitan Open Land and by its conservation area status. The Park is highly accessible with five train and overground station within walking distance. The grade II listed historic metropolitan park has particular historic and cultural significance as the former host of Joseph Paxton's Crystal Palace and includes nationally and regionally importance assets including the Grade II National Sports Centre,

remaining terraces and sphinxes from the palace and the Grade I listed prehistoric Victorian monsters.

The park's assets and cultural and historic significance means that it is an important draw for leisure and tourism at the national and subregional levels: In 2008, it was estimated that that the park welcomed 1.7 millions of visitors annually. The National Sports Centre hosts many regional, subregional and national events and competitions. The location of the park at the apex of Lewisham, Croydon, Southwark, Lambeth and Bromley provides it with further subregional significance.

Crystal Palace Strategic Outer London Development Centre proposed boundary



New Draft Policy - Crystal Palace Strategic Outer London Development Centre

The Council will expect any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC) as defined on the policies map to maintain enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of the Crystal Palace Park.

Any development proposals will be subject to other policies within the Local Plan, notably Metropolitan Open Land policies and guidance related to the Crystal Palace Park Conservation Area and will be required to be consistent with the objectives identified as part of the approved masterplan for the park. They will be expected to contribute to and/or strengthen as appropriate the subregional importance of the SOLDC having regards to its specialist identified strengths whilst maintaining and improving the park's open setting and the visual and landscaping amenities which inform its character and that of the key heritage assets within its boundaries.

The Council will work with the Mayor, the community and other stakeholders to ensure that development proposals and other initiatives within the SOLDC contribute to the long term planning and regeneration strategies for the park and support where appropriate the wider Crystal Palace, Penge and Anerley renewal area objectives.

Supporting Text

The London Plan identifies Crystal Palace as a potential Strategic Outer London Development Centre with specialist economic functions of more than subregional importance related to leisure, tourism, arts, culture and sports. The SOLDC's key strengths are underpinned by the presence of the National Sports Centre within the park, as well as and the historic and cultural significance of the park itself which draws visitors from London and beyond. The park shares its boundary with Lambeth, Croydon, Lewisham and Southwark and is of strategically significance for all of these boroughs as well.

The Crystal Palace Park was created in 1852-55 by Sir Joseph Paxton's Crystal Palace Company to provide a new home for the enlarged Crystal Palace, a large glass and iron structure which housed the Universal Exhibition of 1851 in Hyde Park. The park also included elaborate landscape as well as water and fountain works designed by Sir Joseph Paxton.

The Park and the palace became an international paying attraction until the park was destroyed by a fire in 1936 although some of the now Grade II Listed terraces and ornamental sphinxes remain until today. The Park still includes Dinosaur Island, a collection of over 30 statues created by Benjamin Waterhouse Hawkins in the 1850s set within a model geological landscape. The sculptures' Grade I listing reflects the international significance of the sculptures whose design reflected contemporary scientific advances whilst the model geological landscape's proposed RIG designation reflects its regional significance as a geological site.

The Crystal Palace Park knew a great deal of change from the 1930s culminating in the 1960s with the completion of the National Sports Centre and Athletics Stadium conceived as a Unique "sports park" partially obscuring the park's original walkway axis. The Grade II Listed Centre is a historically significant yet declining sports and leisure facility which, following a long history of hosting a range of national and

international sporting events has become unsuited to Olympic and national use but retains more than subregional importance.

A masterplan submitted by the London Development Agency (now the GLA) was granted outline permission in 2011, establishing key development principles for the Park. Those included a number of environmental improvements to restore the former character of the park, improvements to the National Sports Centre and the building, improvements and redevelopment of a number of key facilities. The vision behind the masterplan was to reinstate the local, regional and significance of the town park including by promoting it as a primary visitor attraction. The Council is currently investigating options to deliver some of the masterplan's proposals through a sustainable Development Strategy. The Council will work to ensure that proposals support the subregional role of the SOLDC having regards to its identified specific strengths.

The Greater London Authority has been investigating options for the possible refurbishment, enhancement and part redevelopment of the National Sports Centre site which it leases from the London Borough of Bromley. The Council will work with the Mayor and with other stakeholders to identify adequate development capacity and ensure it supports the SOLDC designation should any development opportunities come forward.

Whilst significant at a subregional level, the development capacity of the park faces major constraints. The park is designated as MOL almost in its entirety and there are areas designated as sites of Importance for Nature Conservation to the North and the East. Most of the park is furthermore designated as a Conservation Area managed by an adopted SPG, reflecting the historic significance of the park and the setting it provides to the Parkside residences built from the mid to the end of the 19th century on Crystal Palace Road, Thicket Road and Anerley Hill. It is important that any development proposals taking place within the park's setting respect the objectives set by the Crystal Palace Park Conservation SPG, the MOL designation objectives, the nature conservation value of the site and be in accordance with the objectives identified as part of the approved masterplan for the park.

The Crystal Palace Park is included within Bromley's proposed Crystal Palace, Penge and Anerley renewal area where place shaping initiatives and policy guidance will seek to build on and integrate with proposals for Crystal Palace Park and the success of Crystal Palace's District Centre cultural and leisure economy. The Council will work with stakeholders to seek and ensure complementarity between major development proposals and initiatives within the SOLDC and within the renewal area and the wider area of influence of the park where justified in strategic planning terms.