
Decision Maker: **DEVELOPMENT CONTROL COMMITTEE
EXECUTIVE**

Date: **Monday 11 July 2016**
Wednesday 20 July 2016

Decision Type: Non-Urgent Executive Key

Title: **BROMLEY'S PROPOSED DRAFT LOCAL PLAN FOR
CONSULTATION**

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Chief Officer: Jim Kehoe, Chief Planner

Ward: All Wards

1. Reason for report

- 1.1 This report seeks the endorsement of DCC and the approval of the Executive to Appendix A as the Draft Local Plan, subject to alterations agreed by the Chief Planner in consultation with the Leader of the Council, and finalisation of supporting documents for a six weeks consultation in compliance with Regulation 19 of the Town and Country Planning Regulations 2012.
- 1.2 The Draft Local Plan builds on the previous stages of consultation on the emerging Local Plan; Core Strategy Issues Document (2011) Options and Preferred Strategy (2013); the Draft Policies and Designations (2014), the Draft Site Allocations and Further Policies and Designations (2015) and Draft Local Green Space consultation (2016). The Draft Local Plan takes into account consultation responses, the evidence base supporting the plan-making process and is prepared in general conformity with the National Planning Policy Framework (March 2012) and the London Plan 2015 as amended by the 2016 minor alterations.
- 1.3 The Draft Local Plan is the document that the Council considers to be 'sound' in terms of positively prepared, based on robust evidence and consistent with the NPPF and which the Council expects to submit to the Secretary of State for Communities and Local Government.
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2. RECOMMENDATIONS

2.1 That the Development Control Committee:

Endorse Appendix 1 as the 'Draft Bromley Local Plan document for the Executive to agree subject to the Chief Planner, in consultation with the Leader of the Council, being authorised to make alterations to the Draft Local Plan and finalise supporting documents as required prior to its publication.

2.2 That the Executive:

- i) Consider the comments from Development Control Committee with regard to the Draft Bromley Local Plan, and**
- ii) Agree Appendix 1 as the n Draft Local Plan subject to the Chief Planner, in consultation with the Leader of the Council, being authorised to make alterations to the Draft Local Plan and finalise supporting documents as required prior to its publication.**

Corporate Policy

1. Policy Status: New Policy:
 2. BBB Priority: Excellent Council Quality Environment Vibrant, Thriving Town Centres
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Financial

1. Cost of proposal: Estimated Cost £53k to £63k
 2. Ongoing costs: Non-Recurring Cost
 3. Budget head/performance centre: Planning Strategy and Projects
 4. Total current budget for this head: £78.5k
 5. Source of funding: Existing revenue budget 2016/17 including a carry forward sum of £47k.
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Staff

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

1. Legal Requirement: Statutory Requirement Non-Statutory - Government Guidance None: Further Details
 2. Call-in: Applicable Not Applicable: Further Details
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Customer Impact

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

1. Have Ward Councillors been asked for comments Ward Councillors have been invited to participate in various stages of the preparation of the Local Plan.
2. Summary of Ward Councillors comments Ward Councillors' comments have been taken into account in the preparation of the Draft Local Plan.

3. COMMENTARY

- 3.1 The National Planning Policy Framework (NPPF 2012) supported by the Planning Practice Guidance (PPG), sets out a plan-led planning system and emphasises the importance of having an up to date Local Plan for an area based on up to date evidence. Appendix A forms the basis of the Draft Local Plan developed from the earlier stages of public consultation on the emerging Local Plan, and evidence gathering for which Development Control Committee's endorsement and the Executive's agreement to consultation, subject to alterations agreed by the Chief Planner in consultation with the Leader of the Council, are now sought.
- 3.2 Consultation on the Draft Local Plan will be in accordance with the updated Statement of Community Involvement.
- 3.3 The Local Plan together with other local development documents, namely the Bromley Town Centre Area Action Plan, Supplementary Planning Documents, and the London Plan, form the Development Plan for the Borough, setting out land use principles, development sites and the framework for determining planning applications. The Government has stated that local planning authorities without an up to date plan by early 2017 will be penalised.

3.4 Background

- 3.5 Bromley's Unitary Development Plan (UDP) was adopted in 2006, the Bromley Town Centre Area Action Plan 2010, and Supplementary Planning Documents 'Planning Obligations' and Affordable Housing in 2010 and 2012 respectively.
- 3.6 In 2009 the Council sought agreement to 'save' the UDP policies still relevant and required, and the Secretary of State confirmed this in a Direction.
- 3.7 The National Planning Policy Framework in 2012 set a new Local Plan system, which led to the Council preparing a Borough –wide Local Plan which includes planning policies, site allocations and designations.
- 3.8 The Council's Local Development Scheme (LDS) sets out the timescale for the preparation of development plan documents. The LDS was last updated at the end of 2015 and agreed by the Executive at its January 2016 meeting.
- 3.9 The Council has undertaken several stages of public consultation, most recently, and of relevance to the Draft Local Plan are:
- the Draft Policies and Designations Document 2014 which included a Call for Sites inviting the submission of sites, for assessment as potential sites in the Local Plan,
 - the Draft Allocations, Further Policies and Designations Document 2015 which included the sites assessed and proposed for inclusion in the emerging Local Plan, and
 - The February-March 2016 consultation regarding the revised Draft Local Green Space, policy, criteria and inviting nominations.
- 3.10 The responses to these consultations, the evidence base, and the NPPF, PPG and London Plan have all been considered and taken into account in preparing the Draft Local Plan.
- 3.11 Appendix B provides a summary of the responses to the consultation together with officer comments for information.

- 3.12 The Local Development Framework Advisory Group (LDFAP) has met regularly throughout the process to provide advice on the preparation of the emerging Local Plan.
- 3.13 The Council's intention is to review Bromley Town Centre Area Action Plan as soon as the Local Plan is adopted, as shown in the latest LDS and this is reflected in the introduction of the Draft Local Plan and a Bromley Town Centre Policy. Earlier this year the Mayor of London announced the approval of a Housing Zone for Bromley Town Centre supporting its Opportunity Area status
- 3.14 The London Mayor intends to prepare a new London Plan by 2019, with a London wide Strategic Housing Land Availability Assessment being undertaken and other evidence base work started or due to start in the coming months.

4. Structure of the Draft Local Plan

- 4.1 The Draft Local Plan uses nine main chapter headings to group policies thematically as for previous consultations, although many policies contribute to a number of the objectives set out in the Vision and Objectives section. A series of appendices will detail the site allocations, maps showing designations, summary infrastructure delivery schedule and glossary and additional information where appropriate. Supporting documents will accompany the draft Local Plan consultation such as Evidence and Technical explanatory papers.
- 4.2 The format of the document will be refined, and policies numbered and cross referenced for ease of reference in advance of the publication for consultation.

Draft Local Plan Structure:

- Introduction
- Vision and Objectives
- Spatial Strategy
- Living in Bromley
- Supporting Communities
- Valued Environments
- Working in Bromley
- Getting Around
- Environmental Challenges
- Delivery and Implementation

5. Consultation response and amendments included in the Draft Local Plan

- 5.1 The Council's Executive in January 2014 agreed consultation on its Draft Policies and Designations Document setting out the policies and main designations for the emerging Local Plan which included a 'Call for sites' inviting sites to be submitted for consideration as potential site allocations to help deliver the emerging Local Plan's Vision and Objectives. The Council received over 100 responses to the consultation and over 50 completed 'Call for Sites' forms.
- 5.2 In the same month the Mayor published his Draft Further Alterations to the London Plan (FALP) which included new designations and changes relevant to the Local Plan preparation, in particular, the designation of Bromley Town Centre as an Opportunity Area, a revised minimum housing figure and Crystal Palace identified as a Strategic Outer London Development Centre. These changes together with the responses to the 2014 consultation and updated evidence informed the preparation of the 2015 Draft Allocations and Further Policies and Designations.
- 5.3 The Council received over 1000 responses to the 2015 consultation document. Many of these were in response to individual proposed site allocations. In response to the 2016 Local Green Space consultation 46 nominations for sites for assessment as Local Green Space were

received together with comments on the Draft Local Green Space policy and criteria. Summaries of the comments with officers' comments are in the latter part of Appendix B to this report.

- 5.4 A summary of the responses to the consultations with officer comments, as indicated earlier, form Appendix B. These together with updated evidence, and changes in the national and London policy context have informed the changes in the Draft Local Plan which forms Appendix A. The sections below highlight some of the main changes to the policies, designations and allocations.

Vision and Objectives

- 5.5 Revisions to the Vision and Objectives have been made in response to consultation responses, seeking word changes to strengthen the emphasis on the protection and enhancement of the special qualities of the Borough, and for clarity. The vision and objectives have been developed from the Borough's Community Strategy, Bromley 2020, and the Council's strategy for Building a Better Bromley.

5.6 Spatial Strategy

- 5.7 The Spatial Strategy sets out the strategic spatial approach to development to deliver the vision and objectives, and reflects the strategic designations and requirements of the London Plan. Minor amendments have been made for clarity.

5.8 Living in Bromley

- 5.9 The 2015 Local Plan consultation document reflected the London Plan requirement for the borough to provide a minimum of 641 homes per annum, a concern raised in response to the 2014 document, as it overlapped with the increased housing target in the Draft FALP. The revised *housing supply policy* in the Local Plan, provides further detail on how this will be delivered through site allocations and broad locations. A draft housing trajectory sets out timeframes for when sites are expected to be delivered. The *affordable housing policy* has been amended to reflect the PPG revision for local planning authorities to only seek affordable housing on schemes capable of providing 11 or more homes and to reflect local intermediate housing income thresholds. Living in Bromley policies relating to new housing development have been updated to make reference to the Mayor's Housing SPG and Technical housing standards – nationally described space standards.
- 5.10 *Site Allocations* for housing and mixed use sites are included with all those proposed in the 2015 consultation document taken forward, and the additional sites of Orchard Lodge, Anerley, the Hill Car Park, and adjoining lands, Bromley Town Centre, and an extension of the BTCAAP Site G towards Bromley South.
- 5.11 *Traveller site* details have been updated to reflect changes in the planning status of individual sites, notably the addition of a single pitch site reflecting a recent High Court judgement.

5.12 Supporting Communities

- 5.13 The section remains substantially unaltered with the exception of education policies and sites. In addition to the Supporting Communities policies in the 2015 consultation document and additional '*Education Site Allocations Policy*' highlighting 16 sites. Alterations from sites highlighted in the 2016 document include, the addition of the Kentwood Site and the removal of the following sites as options to meet need - Balmoral Avenue, Mead Road Infants, former All Saints School and Bromley Civic Centre site. Additionally the proposed allocated areas have been reduced at 12 of the sites to minimise that amount of land taken out of Green Belt or Metropolitan Open Land.

- 5.14 Other notable amendments include the reduction of the marketing period required by policies addressing community facilities and public houses from 18 months to 6 months, reflecting the marketing period required for non- designated business sites.

5.15 Getting Around

- 5.16 *Residential parking standards* have been amended as part of the *Parking Policy* and refined in light of responses and the Minor Alterations to the London Plan 2016 providing Outer London boroughs the ability to provide more generous parking standard in areas of the their boroughs falling within Public Transport Accessibility Levels 0-1 and parts of PTAL 2. Transport for London (TfL) and the Greater London Authority (GLA) had raised the previous approach as an issue of non-conformity. The revised approach is considered to be in conformity with the London Plan as amended in 2016.
- 5.17 Revisions have been made to the *Highway Infrastructure Provision policy* to reflect the role of the Council's Crossover Policy and Guidance, and the approach to unmade roads.
- 5.18 The named areas within the *land safeguarded for transport improvements policy* have been updated to reflect new safeguarding lines where available, and to remove those that have been completed or are no longer required.

5.19 Working in Bromley

- 5.20 A new *Bromley Town Centre policy* reinforces the relationship between the Local Plan and the Bromley Town Centre Area Action Plan and the role of the Town Centre in delivering the vision and objectives for the Borough.
- 5.21 Changes are made to the *Strategic Industrial Location (SIL) policy* to clarify consideration of non-industrial uses in the Cray Business Corridor, as well as the dual designation of Cray Business Park as a SIL and an Office Cluster.
- 5.22 Revisions have been made to the *Locally Significant Industrial Sites (LSIS) policy* to remove the 1,000sqm floorspace threshold for Use Class B8, as a large number of existing warehouse and storage premises already exceed this size in current LSISs.
- 5.23 Clarification is added on the marketing requirements for proposals in an LSIS that would result in a loss of Class B uses, stating that a reasonable timescale is considered to be at least two years (consistent with the Mayor's SPG Land for Industry and Transport). Marketing requirements for non-designated sites is reduced from 18 months to a minimum 6 month period prior to the submission of an application.
- 5.24 Revisions have been made to the *Office Clusters* to remove the proposed Beckenham High Street Office Cluster as Prior Approval for the majority of offices to residential use means the area no longer meets the cluster definition.
- 5.25 The *Large Office Development and Large Campus Style Development* policies have been removed as incorporated within the Town Centre policies.
- 5.26 *Biggin Hill SOLDC* policies remain largely unchanged in intent. Proposed Green Belt amendments are predominantly unchanged from those included in the 2015 Draft Allocations, Further Policies and Designations document, with a minor change made to the parcel known as Land East of South Camp, to retain a section of land identified as a Site of Importance for Nature Conservation in the Green Belt. Elaborations are made to draft policies for each land parcel to clarify where land is safeguarded for aviation-related uses, where a degree of flexibility is allowed and the circumstances it may be appropriate and consideration of sensitive

environments in the vicinity of the SOLDC. A new policy for *Noise Sensitive Development* in Biggin Hill is proposed, which responds to current national airport noise policy and guidance.

5.27 *Crystal Palace SOLDC* was included in the 2015 document following its identification in the London Plan 2015. The GLA and adjoining boroughs made comments, with the boroughs supporting the proposed boundary, and the GLA suggesting its extension. However, as it lies within the Crystal Palace, Anerley and Penge Renewal Area, the links between the two are explicit in policies enabling the benefits of the SOLDC to be shared by the adjoining town centres and communities.

5.28 Town centre policies have been strengthened with a *Bromley Town Centre Opportunity Area policy* which sets out the intended review of the BTCAAP in the context of the Opportunity Area Status, and amendments to policies in relation to the changes to the General Permitted Development Order, responses to consultation and the NPPF and PPG.

5.28 Valued Environments

5.29 A revised *Draft Local Green Space Policy*, (LGS) an invitation to nominate sites for consideration as LGS and draft criteria for assessing these sites all formed part of a six week consultation in February/March 2016. Comments were received in response to the Draft Policy and in relation to the draft criteria and 46 sites nominated.

5.30 The Draft Local Green Space policy in the Draft Plan has been revised in response to comments, and revised criterion proposed against which nominated sites were assessed. 25 sites are being proposed as LGS in the Draft Local Plan and are listed within the Proposed Local Green Space Policy. The proposed LGS sites are identified in an appendix to the Draft Plan. The Local Green Space assessments will be published alongside the consultation process in September.

5.31 Environmental Challenges

5.32 Responses were made in relation to the 2014 consultation, in particular from Thames Water, the GLA, and several adjoining boroughs. Although not included specifically in the 2015 Draft Allocations, Further Policies and Designations, five email responses referred to matters within this chapter.

5.33 The *Waste Policy* has been amended for new waste facilities to look first to industrial area, which is London Plan complaint, and the SIL policy in Working in Bromley has been amended to the same effect. Wording also amended for clarity that strategic waste sites will be safeguarded for waste uses only.

5.34 A new '*Waste Management in New Development*' policy has been included in response to consultation comments and to meet the London Plan target for recycling.

5.35 The '*Reducing Flood Risk*' policy has been amended in response to comments from the Environment Agency and suggestions from other consultees.

5.36 A new '*Water and Wastewater Infrastructure Capacity*' policy is included following comments from Thames Water.

5.37 The '*Carbon dioxide reduction, decentralised energy networks and renewable energy*' policy has been amended to include reference to setting up a carbon off-setting fund to take advantage of any payment in lieu contributions, previously in the supporting text.

5.38 Other policies have been revised to reflect comments from the Council's environmental health officers and other technical advisors.

5.39 **Delivery and Implementation**

Amendments have been made to this section to clarify in particular the roles and responsibilities of developers.

6. **Conformity with the Nation and London Policy Context**

6.1 **National Planning Policy Framework**

6.2 The Government published the National Planning Policy Framework (NPPF) in March 2012, with the Council's subsequent consultation documents reflecting its new approach and policy requirements. The Planning Policy Guidance (PPG) was published in 2014 and the 2015 consultation and Draft Local Plan have been prepared with regard to this, and recent changes to both the NPPF and the PPG.

6.3 The NPPF says that Local Plan should be aspirational but realistic and should address the spatial implications of economic, social and environmental change.

6.4 It explains in Paragraph 157 that:

"Crucially, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified."

6.5 And in paragraph 182 that:

"The Local plan will be examined by an independent inspector whose role it is to assess whether the plan has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements and whether it is sound. A local planning authority should submit a plan which it considers is "sound" – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

6.6 The London Plan

- 6.7 Bromley’s Local Plan is required to be in general conformity with the London Plan. The London Plan has been revised several times during the preparation of the Draft Local Plan, with revised early minor alterations published in 2013, the Further Alterations to the London Plan, published March 2015, and most recently, the Minor Alterations to the 2015 London Plan published March 2016. The latter document, provides greater flexibility for Bromley as an Outer London borough to provide more generous residential parking standards in areas with lower levels of public transport accessibility.
- 6.8 The responses to the consultation from the Mayor to each stage of the consultation have been considered and reflected in the revisions to the Council’s 2014 and 2015 consultation documents, and now, in the Draft Local Plan to be in general conformity.
- 6.9 The key London Plan designations and strategic policy requirements for the Borough include:
- The provision of a minimum of 641 homes per annum, with policies encouraging/enabling this to be exceeded.
 - The hierarchy of town centres, Bromley (Metropolitan), Orpington (Major), Beckenham, Crystal Palace, Penge, Petts Wood, West Wickham (District Centres)
 - Bromley Town Centre, an Opportunity Area
 - Biggin Hill and Crystal Palace identified as potential Strategic Outer London Development Centres
 - Part of the Cray Valley a Strategic Industrial Location (Industrial Business Park)
 - Bromley as a ‘restricted borough ’ in terms of the loss of industrial land.

7 **The Draft Local Plan and Consultation**

- 7.1 Appendix A forms the basis of the Draft Local Plan for consultation which will be undertaken in compliance with the Town and Country Planning Regulations (2012). This stage of consultation is often referred to as ‘Regulation 19’ consultation. Regulation 19 states:

“Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must –

- (a) make a copy of each of the proposed submission documents and a statement of the representation procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representation under regulation 18 (1).”

- 7.2 The proposed consultation will meet the requirements of the regulations and the revised Statement of Community Involvement.

Consultation Process

- 7.3 The intention is to consult on a Draft Local Plan which the Council considers has been prepared in line with the relevant planning legislation and regulations and is in conformity with national and London policy.
- 7.4 The consultation as for previous stages of the Local Plan preparation will be web based to minimise the costs to the Council and facilitate the analysis of responses. The cost of the consultation process for this stage of the Local Plan is estimated to be £3k which will be funded from the local plan budget within Planning.
- 7.5 Responses will be made public, and will accompany the submission of the Draft Local Plan to the Secretary of State.
- 7.6 Consultation will be for six weeks as required by the Town and Country Planning Regulations 2012 and consistent with the Council's updated Statement of Community Involvement.

The consultation will invite comments on whether the Draft Local Plan has been prepared in line with the legal processes required, and whether it is 'sound' as defined in the NPPF (para 182.)

- 7.7 To maximise the awareness of the opportunity to comment on the Draft Local Plan the consultation programme will include:
- Emails /letters to over 1500 contacts on the planning database advising of the consultation details. This includes statutory consultees, adjoining boroughs and partner agencies, residents associations and individuals, businesses and developers who have registered their interest in being consulted. Respondents to earlier consultations have been encouraged to register to automatically receive notification of the consultation when it starts.
 - A dedicated webpage and links from the Council's home page www.bromley.gov.uk
 - Press releases and articles in the local papers and community newsletters.
 - Article and link to the webpage in Community Links Bromley e-bulletin to over 500 voluntary and community organisations,
 - Article and link to the webpage in the Council's business bulletin sent to over 2500 businesses
 - A display promoting the consultation within the Civic Centre, and libraries where possible.
 - Inclusion in 'Update' circulated to all Residents' Associations.
 - Copies of the Draft Local Plan will be available for inspection at the Civic Centre, Mottingham and Cotmandene Outreach Centres, Community House, all Bromley Libraries and Upper Norwood library.
 - Posters and flyers displayed in Council offices, and libraries, and circulated to partner agencies for distribution where appropriate.
- 7.8 The Draft Local Plan when published for consultation in September will be accompanied by a Sustainability Appraisal including an Equality Impact Assessment and supporting documents including an updated evidence base. The illustrative appendices to the Draft Local Plan, included at the end of Appendix B to this report will be complete prior to the consultation.

Next Steps

- 7.9 Subject to approval, the draft Local Plan will be finalised, formatted, with detailed mapping, and placed on the Council's consultation portal.
- 7.10 The response to consultation will be reported to Members, and Members will decide whether to modify and submit the Draft Local Plan, to the Secretary of State for Communities and Local Government for examination together with the responses and supporting documentation including evidence and technical explanatory details.

7.11 The publication of the Draft Local Plan will be accompanied by a Sustainability Appraisal and supporting documents.

8. POLICY IMPLICATIONS

8.1 The Local Plan when adopted, together with other local development documents, including the Bromley Town Centre Area Action Plan, and the London Plan will form the Development Plan for the Borough.

8.2 Bromley 2020 as the Sustainable Community Strategy for the Borough was the starting point for developing the Vision and Objectives and earlier draft documents in the preparation of the emerging Local Plan. The Local Plan is required to be in general conformity with the National Planning Policy Framework (2012) and the London Plan (2015 as amended in 2016).

9. FINANCIAL IMPLICATIONS

9.1 The cost of the six week consultation process is estimated to be £3k.

9.2 In addition, the costs of the Inspection in Public are expected to be between £50k and £60k. These costs can be met from the £31.2k budget for the Local Plan and the carry forward sum of £47.3k.

10. LEGAL IMPLICATIONS

10.1 The proposals are consistent with planning legislation and regulations

Non-Applicable Sections:	Personnel implications
Background Documents: (Access via Contact Officer)	DRR 14/002 DCC and Executive 'Draft Policies and Designations for Consultation'. DRR15/070 DCC and Executive 'Bromley's Local Plan – Potential Site Allocations, Draft Policy and Designations Alterations for Consultation'. The London Plan 2015 and Minor Alterations March 2016 National Planning Policy Framework (2012) Local Plan Evidence Base www.bromley.gov.uk/localplan