

5. Supporting Communities

Supporting Communities

Introduction

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

Health and Wellbeing

The development of town planning in 19th Century Britain came out of an understanding of the impact of the environment and development upon human health, leading for example to the provision of sewers and the development of building codes.

The Health and Social Care Act 2012 highlighted the need for partnerships and a shared health vision and agenda, and it proposes that public health be better integrated with areas such as social care, transport, leisure, planning and housing.

This is supported by National Planning Practice Guidance which highlights the importance of local authority planners engaging and consulting with Health and Wellbeing Boards who are responsible for producing a Health and Well-being Strategy, underpinned by a Joint Strategic Needs Assessment (JSNA). Health and Wellbeing Boards bring together local authorities, the NHS, communities and wider partners. Bromley's current Health and Wellbeing Strategy (2015)

Social Infrastructure

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

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

The Infrastructure Delivery Plan will highlight requirements for additional supporting infrastructure, including schools, open space, community, health and leisure services which will assist in ensuring thriving and sustainable places in Bromley over the Local Plan period.

Community Facilities

Draft Policy x: Community Facilities

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

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

Planning permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure. Where a proposal for alternative social infrastructure involves a change of use not permitted under the GDPO Use Classes Order, the lack of need for the specific use class must first be demonstrated.

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

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The ranges of uses that would be described as Community Facilities and / or Social Infrastructure, is very broad. The London Plan Policy 3.16 identifies the following as social infrastructure but advises that the list is not intended to be exhaustive; *“health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live”*.

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

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

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

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

The policy therefore resists the loss of community facilities unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for them or other forms of social infrastructure. Such a demonstration of need should include consultation with relevant Council departments and third party providers to establish whether any community groups or service providers express a need for the site and are interested in buying or leasing it, as well as a six month period of marketing which is current and robust at a realistic value reflecting its existing use value (supported by a Viability Assessment which will be reviewed at cost to the developers). Proposals that involve a change of use between forms of social infrastructure, not permitted under the use classes order, will also be required to demonstrate a six month period of marketing.

The Council recognises the financial realities faced by voluntary organisations in relation to their buildings and will consider sympathetically proposals designed to support the maintenance and continued community use of such facilities.

Valued Local Community Assets

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

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

London Plan Policy 4.8 relates to “sustainable access to the goods and services that Londoners need”, and, with reference to public houses notes that evidence of community asset value “includes where an asset is listed as an Asset of Community Value under the Localism Act 2011 or where an application has been made”. This is not an exclusive approach and other evidence may indicate that an asset is valued locally.

Draft Policy x: Opportunities for Community Facilities

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

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

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

Supporting Text

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

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

The location of facilities should mirror the scale of the catchment of its users, ensuring appropriate accessibility. Where appropriate to the catchment, facilities will be expected to be suitably located in strategic locations such as town centres with

good access to public transport. The changing nature of retail shopping presents opportunities for community facilities to populate former retail units complementing the existing shopping function and helping to support the vibrancy of local parades and town centres. Additionally, subject to Local Plan retail policies, temporary community uses, which provide services to the public, can support the vibrancy of high streets or local shopping parades where a shop unit would otherwise lie vacant. Where a temporary community facilities use is permitted within an existing non “D” Use Class building, the restriction of the loss of community facilities afforded by Policy 6.1, which might discourage such temporary use, will not apply.

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

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

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

The National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. This can include enhancing community facilities, supporting educational opportunities, encouraging inclusion and engaging young people.

Planning Practice Guidance advises local planning authorities to consult Sport England in cases where development might lead to losses, or the creation or enhancement of major sports facilities, or the creation of pitches. Sport England’s Land Use Policy Statement “Planning for Sport, Aims and Objectives” details three objectives in respect of planning:

1. resisting loss of facilities and land,
2. ensuring best use of existing facilities,
3. ensuring new facilities to meet current and future demand for sporting participation

Pro-Active Bromley is a strategic, independent alliance of partners, including Bromley Council. The [Pro-Active Bromley Strategy Framework \(2011–2016\)](#) seeks to sustain and increase participation in sport and physical activity in Bromley and support the development of accessible sports and leisure facilities in the Borough to improve the quality of provision and widen opportunities to participate in sport and physical activity.

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

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

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

Draft Policy x: Social Infrastructure in New Developments

New developments will be expected to provide social infrastructure appropriate to the nature and scale of the proposal, such as open spaces designed for imaginative play, on site provision of community facilities and / or contributions to off-site facilities. Developments of significant scale will create their own environment and therefore should incorporate within their design, public realm and / or community facilities, which create a sense of place, particularly in Renewal Areas and areas of acknowledged deficiency.

Supporting Text

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

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

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

Health and Wellbeing

Draft Policy x: Health & Wellbeing

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

- i. requiring applications to maximise opportunities to support and enhance health and wellbeing, encouraging physical activity, providing , accessible and adaptable new dwellings [Building Regulations M4(2)], ensuring appropriate access to open space, particularly in areas of deficiency, and optimising health benefits throughout scheme design.
- ii. considering the implications of proposals for health and wellbeing,
- iii. allowing extensions to existing facilities and permitting new or improved health facilities, provided that they are easily accessible by public transport or are located within existing shopping centres or local parades, unless there are demonstrably negative local impacts which substantially outweigh the need, which cannot be addressed through planning conditions or obligations.
- iv. Securing appropriate health contributions through planning obligations where appropriate alongside other suitable funding mechanisms to support the delivery of infrastructure, facilities and services to meet needs generated by development and mitigate the impact of development;

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

Supporting Text

Health is at least partly linked to the way we live our lives. The nature of the environments in which we live, work and relax affect both our physical and mental health. It is recognised that beyond fixed age, sex and hereditary factors there are “wider determinants of health”, including social, economic and environmental factors which are important for understanding health inequalities. The Marmot Review “Fair Society Healthy Lives” (2010) makes a clear recommendation that planning, transport, housing, environmental and health policies should be integrated to address the social determinants of health.

Healthier people tend to be happier, tend to play an active role and contribute to society and the economy through their families, local communities and workplaces. Conversely, poor physical and / or mental health and wellbeing puts a strain on individuals, the NHS, the economy and society. National Planning Practice Guidance advises that “development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital”

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

The Health and Social Care Act 2012 emphasises the prevention of illness with a specific leadership role for local government in respect of public health responsibilities including, tackling health inequalities, health protection and obesity.

The design of homes can influence mental and physical health. All new dwellings, other than Category 3 Wheelchair user dwellings, should be accessible and adaptable (meeting requirement M4 (2): Category 2 of The Building Regulations).

The benefits of green space and exercise in relation to mental health are well documented (e.g. MIND “Ecotherapy”) whilst certain proposals may present health concerns, for example, relating to air or light pollution (draft policies 10.7 and 10.9) or to the proliferation of hot food takeaways (draft Policy 9.26). Where health and wellbeing impacts are apparent they will be considered in light of national guidance and locally recognised health evidence, to assess the health impact on the community.

The NHS Healthy Urban Development Unit (HUDU) has produced a check list to deliver healthy sustainable communities (Watch Out for Health) which assists in the assessment of development proposals contribution to “Lifetime Neighbourhoods” which provide safe, healthy, supportive and inclusive neighbourhoods for people at all stages of their lives

The Bromley Health and Wellbeing Board’s 2015 strategy, which highlights the important links between health and a range of factors including, housing, green space and employment and access to education, leisure and transport, reflecting the Local Plan vision for high quality environments to ensure healthy, full, independent and rewarding lives. The Strategy focuses on four priorities, obesity, diabetes, dementia and the emotional wellbeing of young people, all of which are influenced by the physical environment and responds to the Joint Strategic Needs Assessment (JSNA), which provides an understanding of the current and future health and wellbeing needs of the population and in 2015 specifically highlighted that two thirds of the borough’s population are termed overweight or obese, a key risk factor for cardiovascular disease and cancer which are top two causes of death in Bromley; that the Borough has, and is predicted to continue to have, the highest number elderly people in London, making the prevalence of dementia a key consideration; and that the variation in life expectancy between wards can be as high as 9 years.

Health Facilities

The Council recognises the benefits of providing a range of health care services close to the communities they serve, including doctors & dental surgeries, chiropractors, osteopaths, mental health and other specific health facilities conventional or complementary to meet the needs of the population generally and those of particular vulnerable groups. National Planning Practice Guidance advises that local authorities should consider the healthcare infrastructure implications of any relevant proposed local developments.

Practices can sometimes be accommodated within residential properties without having a significant impact on the amenity of the surrounding residential area.

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

Hospitals and other health facilities within the Borough may also require modernisation, reorganisation or expansion during the plan period. The Council will liaise with the relevant health organisations to support and enable development and improvement of appropriate health care provision and seek planning obligations or contributions through other mechanisms as set out in the Implementation Policy.

Education

Local authorities have a statutory duty under the Education Act 1944 to secure sufficient school places within their areas. The Academies Act (2012) changed the approach to educational provision and encourages the establishment of new Free Schools. The National Planning Policy Framework (NPPF) advises that local authorities should “give great weight to the need to create, expand or alter schools”.

Provision for primary places has been increasing significantly and steadily for the last 6 years, increasing the pupil intake at reception age by the equivalent of over 25 form of entry (FE) - that is the ongoing provision of 25 reception classes of 30 pupils. Expansions to existing school infrastructure and new provision have together provided 16.5 FE with the rest provided in single year ‘bulge’ classes and through new provision in temporary locations. Bulge classes only provide for a single year of entry. These classes are not part of the schools normal roll / published admission number (PAN) and may be sited in non- classroom / communal school space. They do not therefore address a need for permanent FE.

The increased pressure for places is now feeding through to the secondary sector.

National Planning Policy

The National Planning Policy Framework (NPPF) (2012) requires local planning authorities to assess the quality and capacity of infrastructure, including education and its ability to meet forecast demands (para 162); and to plan positively for the infrastructure required in the area (para 157).

The Government specifically “attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities” (NPPF para 72). It states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education by giving great weight to the need to create, expand or alter schools; and by working with schools' promoters to identify and resolve key planning issues before applications are submitted.

London Plan

The London Plan 2015 highlights local authorities' strategic role taking a proactive, positive and collaborative approach to development that will widen choice in education, requiring local plans to "secure sites for future provision recognising local needs and the particular requirements of the education sector." (London Plan Policy 3.18 Education Facilities). It advises that land already in educational use should be safeguarded and new sites secured to meet additional demands or changes in provision and that new schools "should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school which cannot be addressed through the appropriate use of planning conditions or obligations".

The London Plan Policy 3.16 'The Protection and Enhancement of Social Infrastructure', advises that the suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.

The Mayor's approach reflects the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on "Planning for Schools Development" (Aug 2011) which reiterates that there should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.

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

In response to the increasing demand for school places the Local Plan addresses need by safeguarding 'Education Land', enabling necessary expansions and allocating sites, in line with the requirements of the NPPF.

Draft Policy x: Education

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

- i. assessing the need for the range of education infrastructure over the plan period and allocating sites accordingly, (see Education Site allocations policy)
- ii. defining land with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, and land allocated for such use through this plan, as 'Education Land' and safeguarding these sites for education purposes for the period of the plan. Whilst Education Land and buildings may also perform dual functions for wider community use, the

redevelopment of education land for alternative uses, including other uses within the same use class, will not be permitted,

- iii. permitting extensions to existing schools which seek to address local need, subject to Local Plan open space and conservation policies, unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. Proposals for school extensions on land adjacent to Education Land will also be considered favourably.

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

Supporting Text

All sites with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, will be defined as 'Education Land' and protected for education purposes for the period of the plan. This includes any future sites where new educational provision (excluding non-purpose built early years provision) is established on a permanent basis. The policy, which resists non education development, including other uses within Class D1 of the Town and Country Planning (Use Classes) Order 1987 (as amended), covers all buildings and land within the boundaries of the facility, including, educational and sports facilities, open space, ancillary buildings, car parking areas and access routes within the school boundaries and under the schools control. The designation also includes school playing fields, under the control of the school, but excludes non-school open spaces to which schools have access. The only exceptions to this designation would be land and buildings in use as Free Schools for the temporary period of a year, in response to the changes to the General Permitted Development Order (GPDO). Should permanent permission be subsequently permitted they will be considered to be 'Education Land'.

In circumstances where alternative, more appropriate, sites are found for a school temporarily located in converted residential or office buildings, the Local Plan 'Supporting Communities' policy would allow the reversion to offices or residential use and the safeguarding element of the "Education Land" policy would not be applicable.

Local planning authorities are encouraged to seek to approve applications for sustainable development where possible and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area (NPPF para 187). It is therefore important that opportunities to address the pressure for education provision are not refused on grounds where there are potential solutions to mitigate adverse impacts of the development, through planning conditions or obligations, (e.g. travel plans, highways measured, staggered school hours, landscaping). Where sites are constrained, opportunities to enhance existing facilities by expanding onto adjacent sites will be supported, subject to the

policy. Given the ability of schools to be established on sites without their own playing fields it will be important that open spaces indicated to provide this function are protected, since patterns of physical activity established in childhood can be a key determinant of adult activity levels and therefore influence physical health.

Draft Policy x: Educational Facilities

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

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

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

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

Where Free Schools have operated from buildings for a year under “Permitted Development” (Part 4, Class C), and, having been unable to secure a more appropriate location, are required to seek planning permission to remain permanently, applications for planning permission, will be supported subject to compliance with the limited requirements under “The Town and Country Planning (General Permitted Development) (England) Order 2015, Part 3 Class T”, which enables permanent changes of use.

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

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

Supporting Text

Whilst acknowledging the freedoms of Academy and Free Schools, applicants will be expected to:

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

The London Plan notes in Policy 3.16E that where a social infrastructure facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Providers should look to explore opportunities presented by redundant social infrastructure when considering locations and demonstrate that investigations have been made when submitting applications for new educational sites.

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

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

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

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

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

Assessing Need for Provision

The Council’s Primary and Secondary School Development Plans detail the need and strategic planning for school place provision in the borough. The most recent versions of these plans were approved by the Council in January 2016 and form part of the Local Plan’s evidence base. Need is expressed in ‘Forms of Entry’ (FE), entry age classes of 30 children.

Pupil place projections take into account a range of factors. However, the dependence upon birth data combined with recent migratory changes between London boroughs has made predicting primary need harder and more difficult to manage than secondary provision, for which there are longer lead in periods.

Pupil place projections produced by the GLA can fluctuate from year to year being based on a number of factors including the previous year's population projections and historic birth data. The result is a lag period of a couple of years with 2015 projections based on children born in 2013. In recent years the primary school projections have underestimated the 2015 /16 published admission numbers (PAN) by up to 12.7FE.

Whilst these fluctuations and anomalies can impact rapidly on primary provision, there is a longer time frame to recognise and adapt to changed circumstances to address secondary provision.

Local Plan Approach to Meeting Need

The Local Plan education policies reflect the NPPF and the London Plan and state that the Council will ensure provision of an appropriate range of educational facilities by assessing the need over the plan period and allocating sites accordingly.

The overall strategy in the School Development Plans has been to meet forecast growth through a combination of 'bulge' classes, permanent expansion of existing provision and new schools.

As options to expand the existing infrastructure to meet the local need reach exhaustion, the Local Plan employs a range of approaches to address the education needs over the plan period, specifically through:

- The assessment of the capacity of existing sites (including redundant social infrastructure and other policy compliant sites in addition to the existing Education Land discussed above)
- increased flexibility on Urban Open Space (UOS) in respect of the expansion of existing educational premises
- Appropriate redesignation of existing school sites from Green Belt and Metropolitan Open Land to UOS, and
- Specific site allocations (with re-designations where required).

Expansions of Existing Schools

The Local Plan policies, reflecting national and regional policy, require that the Council will look first at opportunities to maximise the use of existing Education Land or redundant social infrastructure in line with other community facilities / social infrastructure policies. In order to deliver sustainable site options, and acknowledging the changes to education delivery noted above, the approach to the expansion of existing provision and to new site allocations follows a site assessment and sequential approach, set out in the supporting 'Education Background Paper'. Such an approach ensures consistency, accessibility and transparency, as required by the National Planning Policy Framework. It considers the range of planning designations and sets out a robust approach to assess the relative merits of

sites for additional education provision - (information regarding the planning status of proposals identified in the tables within this chapter reflect the situation at time of drafting – June 2016)

Open Space Designations

Larger school sites in Bromley tend to be covered by open space designations, with the 17 undesignated sites generally smaller, making school expansion particularly challenging. Permanent additional places or bulge classes are already being provided at a number of these undesignated sites and the feasibility of expansion explored at others.

All except one of Bromley Secondary schools have some form of open space protection. The 'Secondary School Development Plan 2015 – 18' suggests secondary provision expansions on the four school sites identified in Table 7, to provide an additional 5FE, of which 2FE at Bishop Justus already have planning permission.

Education Organisation Planning

For any expansion of existing educational/school infrastructure sites, consideration needs to be given to the proximity from which schools attract pupils in relation to demand. Many Bromley primary schools have small proximities, often less than ½ mile from the school. For pupil place planning purposes the Borough is organised into nine Education Planning Areas (EPAs).

The deliverability of any expansion proposal is also affected by educational and operational factors, notably the size of the existing intake, the site and existing accommodation, specific admission criteria, (e.g. faith) and the new legislative education landscape post the Academies Act 2010. Academies are state funded schools, independent of local authority control, and therefore expansion proposals to address need require strong partnership working. Sixteen of Bromley's 17 secondary schools, are academies, with the last maintained secondary school currently exploring conversion to academy status. Eighty-eight percent, that is 65 of the 74 Bromley primary schools are academies either converting to, or exploring conversion, to academy status.

The provision of new schools is through the Free School process. Free Schools can be delivered through two routes: Government funded whereby founding groups, including parents, education charities and religious groups, submit applications to the Department for Education on the basis of parental demand to meet local need, or the 'presumption route' whereby the Local Authority funds the new school and runs a competition to choose a provider. As such the desired location of new schools can be difficult to anticipate, however the projections set out in the evidence base indicate that the primary school need is substantially to the north, northwest and centre of the Borough in Education Planning Areas (EPA)1-4, and this demand is generally reflected in the locations of Free School proposals coming forward.

Secondary school need is less localised and in theory is more 'footloose', however, the circumstances surrounding some of the specific Free School applications to the Secretary of State for Education have a particular locational focus.

Sites for New Schools

In addition to considering existing education and social infrastructure sites the Local Plan Draft Policies and Designations consultation document (Feb 2014) also included a "Call for Sites" for a range of uses. Assessments were made of these sites and sites identified by proposed Free School providers, some specifically referenced in their submissions to the Secretary of State for Education. The full site assessment methodology and results are set out in the 'Education Background Paper' which accompanies the Local Plan.

Recommendations and Sites for Allocation

The site assessment undertaken (set out in the Education Evidence Base) demonstrates that proposals for new sites are the most sustainable locations for school development, having regard to the limited availability of appropriate sites and the national and regional guidance in respect of the "great importance attached to ensuring sufficient choice of school places".

The constraints of the sites have been assessed and they are considered to provide realistic opportunities for school development to address the current and projected need for education facilities. There will, as part of subsequent planning applications, need to be robust assessments of the impacts, including, for example, highways implications, and appropriate mitigation and conditions attached if planning permission is to be achieved.

The site assessment process highlights the necessity to fully explore all potential policy compliant sites before other sites are considered, particularly where these involve release of Green Belt or Metropolitan Open Land, which require the demonstration of "exceptional circumstances".

Education Need: Primary Schools

The need for Primary School places based on projections is summarised below and indicates a requirement for a further 14.6FE, proposals for which are identified within this plan, to meet the projected need over the next 5 years. Projections beyond this timeframe for the remaining 10 years of the Local Plan will change over time and will be subject to future assessment but the Primary School Development Plan indicates where medium and longer term pressures might be addressed.

Primary Education Summary Table 1

Data	FE	Comment
Current permanent FE	133.5	Includes 16.5 additional FE provided over the past 6 years
Need (5 year supply to 2020/21)	14.6	<ul style="list-style-type: none"> • 8FE backlog (currently provided through bulge classes and a Free School without a permanent location) • 5.6FE additional to 2002/21
Need for the remaining 10 yrs of the plan (2021/22 – 2030/31)	4.1	Beyond 5 year timeframe the projections become less robust and further assessment will be required but 4.1FE provides approx 3% allowance for the 10yr period to 2030/31
Total Need over the Local Plan period	18.7	See Table 2 (reflecting the Primary Schools Development Plan 2016)
Proposals in the Local Plan to address need	16.5 – 19.5	See Tables 3, 4 & 5

Current Outstanding need for permanent FE	Further 5 year need up to 2020/21	Need for the remainder of the plan 21/22 – 30/31	Total Need over the Local Plan period
9FE	5.6FE *	For future Assessment** (4.1FE)	18.7FE
Need to address 5 year supply 14.6FE			

* based on the projected increase in pupil numbers (2014 Projections)

**2014 projections indicate a further 4.1FE

Since 2009 16.5 additions FE have been granted planning permission; however there remains an outstanding need for 9FE as set out in Table 2 which also indicates the projected need to meet the 5 year supply and the need for the period beyond 2021 to the end of the plan. Whilst the projections indicate a need for a further 4.1 FE to 2030, the projections are less robust for this later period and will be subject to further future assessment.

Table 3 summarises the proposals to meet the 5 year supply and the need for the identified above. Details of the individual schools and Local Plan proposals are set out in Tables 4 and 5.

Primary School Proposals	5 year supply to 2020/21 Sites proposed or being explored	5 years – 15 years (to 2030) – potential to bring forward	Proposals in the Local Plan to address need
Extensions to Existing (see attached extract from Table 4)	5.5FE	6FE	11.5FE
New Schools (see attached extract from Table 5)	4FE (2 schools)	1 – 4FE **	5 – 8FE
Total	9.5FE	7 – 10FE	16.5 – 19.5FE

** includes 2FE at BET (also highlighted as potential extension to existing Alternate Provision or new secondary school) and Bushell Way (which if used by relocating existing 1 FE school would only add a single FE)

Table 4 Proposals to meet primary need (Expansions to Existing Schools)						
Expansions to Existing Schools (subject to Academy agreement)	Forms of Entry (FE)		Designation	Local Proposal (Education Land designation)	Plan Land	Ward (Education Planning Area in brackets)
	Proposed	Medium / Long term				
St Johns	0.5		none			(1) Penge and Cator
James Dixon		1	MOL	redesignation		(1) Crystal Palace
Marian Vian	1		none			(2) Kelsey and Eden Park
Wickham Common		1	Green Belt	redesignation		(3) Hayes and Coney Hall
Scotts Park	1		MOL	redesignation		(4) Bickley
Farnborough	1		Green Belt			(5) Farnborough and Crofton
Edgebury		1	Green Belt	redesignation		(6) Chislehurst
Leesons	1			UOS		
Midfield Site		1	Green Belt	redesignation		(7) Cray Valley West
Poverest	1		UOS			(7) Cray Valley West
St Mary Cray		1	None and Green Belt	redesignation		(7) Cray Valley West
Blenheim		1	UOS			(7) Cray Valley East
Oaklands	Proposed expansion to meet existing need	Green Belt	redesignation	(9) Biggin Hill		(8) Orpington
Sub totals	5.5		6			
TOTAL	11.5					

Note: a further 12.5 FE already have planning permission at other existing primary schools

Table 5 Proposals to meet primary need (New Schools / Sites)				
New Free Schools / Sites	Potential Forms of Entry (FE)	Designation	Local Plan Proposal (Education Land designation)	Ward (Education Planning Area in brackets)
Langley Park Schools (Langley Schools site)	2	MOL	redesignation and allocation	(2) Kelsey and Eden Park
La Fontaine (Widmore Centre)	2	UOS	allocation	(4) Bickley
Bromley Education Trust (BET)*, Hayes Lane	2	Green Belt	redesignation	(5) Bromley Common & Keston
Bushell Way	2**	UOS / SINC	redesignation and allocation	(6) Chislehurst
TOTAL	5 - 8			

Note: a further 4 FE already have planning permission at permanent sites for 2 new Free Schools

* Bromley Education Trust also identified as potential secondary Free School Site

** only 1 if Chis St Nicholas relocation

Education Need: Secondary Schools

The growth trend experienced in the primary sector is now being felt in the secondary sector which exceeded the capacity of the existing infrastructure in 2015, resulting in the provision of 3 bulge classes at existing secondary schools.

The Council's "Secondary School Development Plan 2015 – 18" (LBB Jan 2016) indicates that in 2015 there were insufficient places in secondary schools within a reasonable travelling distance resulting in the provision of bulge classes. The plan highlights that by 2018 / 19 there will be a need for 17 additional FE and a further 17 FE by 2022. Currently an additional 2FE have planning permission, there is therefore a pressing need to make allocations for secondary school provision.

To date, two secondary Free Schools, Eden Park High School (formerly referred to as The Beckenham Academy) and Bullers Wood School for Boys, are identified as providing 14FE, although no sites currently have planning permission. Additionally a University Technology College 14yrs + (UTC) has received approval to open from the Secretary of State for Education .

From 2022 to the end of the plan period the projections become less reliable. Proposals to meet the short term need, five year supply and provision for the remainder of the plan period are set out in Table 8. Details regarding the individual schools and Local Plan proposals are set out in Tables 9 and 10.

Secondary Education Summary Table 6

Data	FE	Comment
Baseline (2014/15)	118.8	
7 year supply (need to 2022/23)	32	Based on the Secondary School Development Plan (2016)
Need for 2021/22 – 2030/31	2	
Total Need over the Local Plan period	34	See Table 7.
Site proposals in the Local Plan to address need	Up to 37 (dependent on school size)	See Tables 8, 9 & 10. Up to 21FE without Green Belt releases for which exceptional circumstances must be shown (including 4FE on the Kentwood site [1]).

[1] Kentwood site recommended for addition by Member Advisory Panel

Table 7 Education Need – Secondary Schools			
Need by 2018/19	Need 2019/20 – 22/23	Need for the remainder of the plan 2023/24 – 30/31	Total Need over the Local Plan period
15FE	17FE	2FE	34FE (includes 2 permitted)
Need to address 7 year supply 32FE			

Table 7 summarises the proposals to meet the 7year supply and the need for the Local Plan period. The Secondary Schools Development Plan (2016) indicates a need for an additional 34 FE by 2022, half required within the next 2 years (2FE have been permitted). The projections indicate a further requirement for 2 FE for the remaining 8 years of the Plan. Table 8 indicates proposals to meet the need with details of individual schools set out in Tables 9 and 10.

Table 8 Secondary school proposals to address the short term need, provide a 7 year supply and provision over the Local Plan period.			
Secondary School Proposals	7 year supply to 2022/23	8 years – 15 years (to 2030) Potential to bring forward	Total proposals in the Local Plan to address need
Extensions to Existing (see attached extract from Table 9)	3FE		3FE
New schools / allocated sites(see attached extract from Table 10)	12-14FE (Free school proposals)	Up to 20FE	Up to 34FE
Total	15 - 17 FE	Up to 20FE	Up to 37FE

Note: Bromley Education Trust, Hayes Lane (BET) also indicated as potential extension to existing Alternate Provision or new primary school
Catholic Secondary school aspiration (currently no site proposed)

Table 9 Proposals to meet secondary need (Expansions to Existing Schools)				
Existing School Sites (subject to Academy agreement)	Potential additional FE	Designation	Local Plan Proposal	Ward
Chislehurst School for Girls	1	Green Belt	Education Land designation (existing open space designation retained)	Chislehurst
Ravenswood	1	Green Belt		Bromley Common & Keston
Darrick Wood	1	UOS		Farnborough & Crofton
Total Expansions to Existing Schools	3FE			

Note: No alterations to Green Belt are proposed at the three identified sites, which are embedded within the Green Belt. It is considered likely that a single FE addition to a secondary school could, subject to design, be consistent with the exceptions to “inappropriate development” as set out in para 89 of the National Planning Policy Framework.

Table 10 Proposals to meet secondary need (New Schools / Sites)					
Sites	Potential School	Potential FE	Designation	Local Plan Proposal (Education Land designation)	Ward
St Hugh's Playing Field	Bullers Wood School for Boys	6	UOS	Allocation	Bickley
1 Westmorland Rd	Bromley Technical College	6 - 8	none	Allocations (previously proposed as University Technical College 14+provision)	Bromley Town
Widmore Centre	Potential primary school site	-	UOS	Policy compliant restricted site	Bickley
Kentwood Site [3]	Expand age range or new school (subject to academy support)	4	UOS		Penge and Cator
Turpington Lane Allotments		6 - 8	Green Belt	Redesignation and allocation (Non Green Belt / MOL sites above having been prioritised for allocation)	Bromley Common & Keston
BET Hayes Lane		-	Green Belt		
Land adj Edgebury Primary		8	Green Belt		Chislehurst
Total New Allocations / New Free School		Up to 34FE (up to 14FE without Green Belt re-designation) - none have currently permitted sites			

Note BET – potential expansion of existing alternative provision or primary Free School Site
 Bromley College have ministerial approval for a University Technical College (UTC 14yrs+) which may come forward on 1 Westmoreland Rd

Specialist Educational Facilities

There will additionally be requirements over the plan period for specialist educational facilities, including alternative provision for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education. Proposals to address these additional requirements are set out in Table 9.

<u>Table 11 Proposals to meet other educational (New Schools / Sites)</u>					
Site	Potential	Designation	Local Proposal (Education designation)	Plan Land	Ward
1 Westmorland Road	UTC (with ministerial approval)		allocation (note may come forward as secondary age 11yrs+ provision)		Bromley Town
BET Hayes Lane	Expansion of Alternative Provision		Redesignation and allocation		Bromley Common and Keston
Midfield Site	Expansion of Alternative Provision or Special School	Green Belt	Redesignation and allocation		Cray Valley West
Burwood	Social, Emotional and Mental Health Specialism	Urban Open Space			Orpington

Note BET - also potential new primary or secondary school

Draft Policy x: Education Site Allocations

Subject to Local Plan Policy X 'Education', the Council will seek to meet the need for education provision over the Local Plan period as identified in the Council's Primary and Secondary School Development Plans, by allocating sites for educational purposes and re-designating school sites in Green Belt and Metropolitan Open Land as Urban Open Space (as indicated in tables 3,4,7,8 and 9 and on maps in appendix 1

- i. allocating the following sites for new / enhanced education provision:
 - o 1 Westmorland Road
 - o St Hugh's Playing Field, Bickley Road
 - o Land at Bushell Way, Chislehurst, and
 - o Kentwood

- ii. allocating the following sites for new education provision, removing them from Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as 'Education Land' for education development only:
 - o Land adjacent to Edgebury Primary School
 - o Turpington Lane Allotments (selected area)
 - o Langley Park School for Boys and Langley Park School for Girls
 - o Bromley Education Trust Hayes Lane
 - o Midfield site (including primary school, alternative provision and youth centre), and

- iii. Removing areas within the following existing school sites from Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space to facilitate expansion of education facilities only:
 - o Edgebury Primary School
 - o Scotts Park Primary School
 - o St Mary Cray Primary School
 - o Wickham Common Primary School
 - o James Dixon Primary School
 - o Oaklands Primary School
 - o Castlecombe Primary School

Planning applications will be required to provide robust assessments of the impacts of development, including for example, highways implications, and provide appropriate mitigation to address adverse impacts.

Supporting Text

Bromley's Primary and Secondary School Development Plan 2015 identifies proposals to address the current and projected need for primary and secondary education. Many of these proposals will be dependent upon the co-operation of the

individual schools, the majority of which are academies (outside Local Authority control).

The National Planning Policy Framework (para 72) advises that Local Planning Authorities should take a proactive, positive and collaborative approach to meeting sufficient choice of school places advising that they should give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted.

Proposals will be subject to detailed planning applications, and will be subject to other requirements of Local Plan, notably the “General Design of Development” Policy. Robust assessments of the impacts of development on the locality will be required and proposals will need to satisfactorily address the full range of site specific constraints presented by each site, for example,

- i. Turpington Lane Allotments.
Should proposals impinge on currently utilised allotments along the indicated boundary (up to a maximum of 4 plots along the southern boundary), it will be necessary to relocate the plots on-site to the satisfaction of the Council, over an acceptable time period, including any necessary drainage works. It will also be necessary to provide appropriate access and turning head arrangements for use by the allotment holders.
- ii. Bushell Way.
Proposals will be required to mitigate impacts on biodiversity, minimise the impact on trees ensuring a buffer to adjacent properties, maintain and enhance public access from Bushell Way through to the public open space known as “Walden Woods” and address the requirements for appropriate buffer around and access to energy infrastructure.
- iii Kentwood
Proposals, which would be subject to the agreement of the leaseholders (Harris Primary Academy Kent House), will be required to re-provide the existing education provision , (primary and adult education), either on site or on appropriate, accessible, alternative site or sites.

Land allocated for education purposes is protected from all other forms of development under the Local Plan Education Policy for the lifetime of the plan.

Public Houses

Draft Policy x: Public Houses

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

- i. there is an alternative public house within a 500 metre walking distance of the site and, if the public house is located within a local parade or shopping centre, the diverse offer of that parade or centre is not significantly affected by the loss, and,
- ii. where it can be demonstrated that the business is no longer financially viable as a public house, including the submission of evidence of active marketing as a pub for a substantial period of time.

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

Supporting Text

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

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

Public Houses include a varied range of drinking establishments, as set out in the "Public Houses in Bromley Evidence Base 2014". They can provide communities with a range of benefits, performing not only social but also cultural and economic functions and contributing to the identity of local places. Clause (i) relates to all shopping centres from local parades to the metropolitan centre of Bromley.

Where a temporary community facilities use is permitted within an existing non "D" Use Class building, for example where a micro pub sets up on a short term basis, the restriction of the loss of community facilities afforded by Policy 6.1, which might discourage such temporary use, will not apply.

The loss of public houses in the borough is a cause for concern, since 2000 at least 50 pubs have been lost across the Borough to alternative uses, most commonly restaurant and residential uses.

In line with this national guidance the Council seeks to prevent the unnecessary loss of public houses unless alternative facilities are locally available and there is no adverse effect on local commercial centres or parades and it can be demonstrated that the use as a Public House is no longer financially viable. This would involve demonstrating evidence of 6 months' suitable marketing activity which is current and

robust, and proof that the public house is no longer financially viable through an independent professional valuation, the submission of trading accounts, or other similar financial evidence, whilst the pub was operating as a full time business, and including details of the range of measures employed to attempt increase trade and diversify the offer. Information regarding the business must have been offered freehold and leasehold, locally, and in the region, in appropriate publications and through relevant specialised agents. The CAMRA (Campaign for Real Ale) Public House Viability Test provides a guide to maximising the success of a pub business. A formal validation of the evidence will be undertaken by the Council, at the applicant's cost.

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

For communities wishing to protect a public house (or other community facilities) powers under the 2011 Localism Act allow communities to nominate pubs and potentially see them listed as Assets of Community Value.

Public house buildings may be important due to their heritage value and location. In such circumstances appropriate attention should be paid to policies that address heritage, conservation and character. In any event potential developers are reminded of the need for planning approvals prior to demolition taking place.

Allotments and Leisure Gardens

Draft Policy x: Allotments and Leisure Gardens

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

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

Supporting Text

Allotment gardens present opportunities for outdoor activity social interaction, and healthy eating. In much of the Borough there are long waiting lists for a plot. Physical activity and good access to healthy food can improve quality of diet and help prevent obesity, overweight, diabetes and cardiovascular disease. Planning Practice Guidance outlines the importance of promoting access to healthy food through planning and infrastructure decision making.

The approval of the Secretary of State is required for the disposal or re-use of redundant statutory allotments and whilst vacant allotment sites have in the past been rationalised to provide enhanced allotment plots and benefits to the local

community in terms of open space and housing the London Plan (Policy 7.22) which encourages Land for Food, advises that existing allotments should be protected and suggests that boroughs should identify other potential spaces that could be used for commercial food production or for community gardening, including for allotments and orchards.

Burial Space

Draft Policy x: Burial Space

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

Supporting Text

There are eight cemeteries across the Borough, six of which are owned by the Council and managed by contractors.

There is capacity in the Council's cemeteries at Biggin Hill and St Mary Cray for the period of the Local Plan and there is substantial capacity at the private Kemnal Park Cemetery and Memorial Gardens. It is difficult to predict how demand for internments and cremations may change over time but within the Borough there is provision available for people of all faiths and none.

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

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