

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

VISION AND OBJECTIVES

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Vision and Objectives

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Vision and Objectives	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	Support the objectives for health and wellbeing, in particular the aim to coordinate action in the borough's Renewal Areas where there are strong links between deprivation and health inequalities	Support noted.
Vision and Objectives	1 individual	Support overarching vision up to 2030 and the 9 objectives identified. Significant weight should be given to development proposals consistent with these objectives	Noted
Vision, para 1	English Heritage	Add reference to "historic environments" in Para 1.	Text added
Vision, para 3	English Heritage	Revise para 3 to read "The protection and enhancement of conservation areas, and <i>other heritage assets is achieved, including highly significant heritage assets of Down House, Crystal Palace and Biggin Hill. Quality in the built environment contributes to civic pride and wellbeing, with new development integrated and responding to local character</i> "	Existing text considered adequate.
Vision, para 3	English Heritage	Replace "historic assets" with "heritage assets"	Text changed.
Vision	1 individual; Bromley Biodiversity Partnership/ Judith John Orpington Field Club	Vision Bromley 2030 Paragraph 3, line 2 correct Downe House to Down House	Correction made.
Vision and Objectives	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	The Plan refers to the JSNA, Joint Health and Wellbeing Strategy and the Pro-Active Bromley Strategy Framework but there is no summary of the health issues and challenges facing the borough and the implications for spatial planning. The vision refers to 'living healthy', but this is not defined. no reference to NHS commissioning strategies. The Clinical Commissioning Group (CCG) is currently drafting its Integrated Commissioning Plan 2014–2019 and a Strategic Planning Group comprising the six CCGs in South East London is preparing a South East London Five Year Commissioning Strategy - suggest that there is reference to the strategies and description of the wider determinants of health on page 69.	Further work undertaken with Bromley's Healthy Weight Forum and endorsed by the Health and Wellbeing Board to ensure appropriate inclusion and referencing of health matters.
Objectives – open space	1 individual; Bromley Biodiversity Partnership	Open Space and Natural Environment - Objective 2: 'Encourage the protection and enhancement of biodiversity' Replace 'encourage' with 'promote'.	Current wording considered adequate. No change recommended.
Objectives – open space	1 individual; Chislehurst Society	There is no statement regarding the safeguarding of the Green Belt, ensuring there is no net loss in terms of area.	Green Belt objective amended to "Protect and enhance the Green Belt so that it continues to fulfil its functions"

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Objectives – open space	1 individual; Hayes Village Association	The Green Belt is under threat, and this s likely to increase in the future. We believe that the objective regarding the green belt needs to be strengthened.	Green Belt objective amended to “Protect and enhance the Green Belt so that it continues to fulfil its functions”
Objectives – open space	1 individual; SE London Green Chain Working Party	Reword intro: The Green Belt and South East London Green Chain fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley’s special character and the health and wellbeing of local residents and visitors alike. Objective 1 Reword to: ‘Ensure that the Green Belt and South East London Green Chain continues to fulfil its functions’ Add "Support green infrastructure proposals and policy objectives of the All London Green Grid (ALGG)	Current text specifically refers to Green Belt as a key priority. No change recommended.
Objectives – open space	1 individual	'Ensure the green belt continues to fulfil its functions' isn't strong enough protection for the green belt. Art in parks - I think more trees planted where they have been removed is money better spent. Art doesn't make people more 'comfortable'. But a few more park benches would be nice.	Green Belt objective amended to “Protect and enhance the Green Belt so that it continues to fulfil its functions”
Objectives – open space	1 individual	<p>The broad objectives of for Open Space and the Natural Environment are supported however we are clients are concerned that these objectives have not been substantiated by a robust and reliable evidence base to satisfy the vision and objectives.</p> <p>The policies and proposals of the Development Plan Document must be based on a thorough understanding of the needs of their area and the opportunities and constraints which the Council needs to take into account. Specifically the Council has failed to demonstrate through a credible evidence base how it will ensure that the Green Belt continues to fulfil its functions noting that in time it will be required to review its Green Belt boundaries in order to accommodate new development including housing to meet identified needs.</p> <p>The Council has not undertaken a review of Green Belt boundaries to identify those sites suitable for release. A strategic Landscape and Visual Impact Assessment of potential locations for release should be conducted, Particular attention should be paid to the implications of the Green Belt designation and of the potential effects upon the overriding objectives of this policy designation. In accordance with the National Planning Policy Framework (NPPF) local evidence of current and future levels of housing need and demand must be set out in a Strategic Housing Market Assessment and other market information such as long-term house prices. In accordance with the NPPF there is a need for a robust and detailed review of existing boundaries to establish which parts of the Borough no longer serve a Green Belt function and could be released to meet the Borough’s future development needs.</p> <p>Iris Estate’s land interest at land north of Warren Road, Chelsfield will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the housing objectives of the Plan sound.</p>	Noted. The Draft Local Plan demonstrates through its draft housing supply policy and site allocations how it intends to meet and exceed the housing supply target in the London Plan. It has not been necessary to undertake a full Green Belt review as the target can be met without needing to build on open space.
Objectives - Health & Wellbeing bullet 1	1 individual	What are ‘sustainable’ lives? Define, omit or use a better word or phrase eg. ‘with least damage to the environment’	No change recommended.
Objectives - Health & Wellbeing	1 individual; Bromley Biodiversity	Health and Well Being: in the first para, sentence 3, insert 'good quality greenspace' so it reads, ‘Communities are served by local shopping parades, education, healthcare, leisure, community, good quality greenspace and cultural facilities, including libraries and places of worship.	Wording amended to include “green spaces” as another aspect of community

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
	Partnership/ Judith John Orpington Field Club		infrastructure.
Objectives - Health & Wellbeing	1 individual; Chislehurst Society	Health - There is no recognition of how to manage the conflict between maintaining road traffic and effective promotion of walking and cycling. There is no explicit mention of the importance of education as part of the vision, either in terms of provision, or the benefits of a effective education.	High educational attainment is recognised in the overall Vision, in the provision of facilities which contribute to Heath & Wellbeing, and is incorporated within a specific “Business, economy and the local economy” objectives. No additional reference is considered necessary.
Objectives - Health & Wellbeing bullet 4	1 individual	Queries the desire for ‘modern’ facilities? Some traditional facilities may be preferred. Modern does not always mean good or better – eg. soul-less concrete tower blocks and walkways were once hailed as ‘modern’.	The objective refers to “modern services” in any new facilities.
Objectives - Health & Wellbeing	1 individual	A place of worship in a town centre is wholly consistent with the objective to “ensure new community facilities are appropriately located to provide accessible, effective and modern services, and resist the net loss of facilities.”	Noted
Objectives - Homes Point 2	English Heritage	We welcome the second bullet referring to development, extensions and conversions complementing and respecting local character.	Noted
Objectives - Homes	1 individual	Add a section referring to building homes in a potential flood risk area requiring developers to build suitable flood prepared homes e.g. houses built on suitable columns.	No change recommended.
Objective - Homes	1 individual	Proposal of 470 units does not meet the Objective “ensure there is an appropriate supply of homes to meet varied needs of the local population, which responds to changes demographics, in particular as the population ages” (support Objective overall).	The Borough is required to plan for and exceed the housing supply target in the London Plan. The Housing Supply policy, and the allocations, demonstrate how this is to be achieved.
Objective - Homes	1 individual	Paragraph 47 of the NPPF requires the council to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. The London Plan Draft Further alterations published in Jan 2014 showed that the requirement for average annual housing supply monitoring targets 2015- 2025 has increased. We therefore object that the objective is not currently being met since this new evidence shows that in accordance with Paragraph 47 , the full objectively assessed need has not been addressed.	The Borough is required to plan for and exceed the housing supply target in the London Plan. The Housing Supply policy, and the allocations, demonstrate how this is to be achieved.
Objectives, Built Heritage	English Heritage	Bullet 1 – change to read “conserve and enhance” rather than protect.	Amendments made.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Objectives, Built Heritage	English Heritage	Bullet 2 – reword to align with NPPF, “ensure development complements <i>and responds to local character, and the significance of heritage assets, including their settings</i> ”	Amendments made.
Objectives, Built Heritage	English Heritage	Bullet 4 – reword to include reference to <i>monitoring</i>	To be taken up in the monitoring and implementation section.
Objectives – business and employment	1 individual	<p>Page 15 makes no reference to the contribution that key employment areas in Bromley make to the Borough. Reference should be made to the 3 major employment areas in the Borough and the contribution that they make. For Biggin Hill, the text could read:</p> <p>“Biggin Hill SOLDC is a key employment area in the Borough providing 2,300 jobs and hosting some of the world’s leading aviation businesses.....”</p> <p>Page 18 – the objective of the Biggin Hill SOLDC should go further than enhancing the area’s employment and business opportunities and must be consistent with the SOLDC policy in the London Plan which is to develop and promote SOLDCs. The objective should be to develop, promote and maximise the economic potential of the SOLDC, through the provision of adequate employment land, with the creation of 2,300 jobs, contributing to London’s World City status and the enhancement of timely access to the Airport, within limits set out within an Environmental Management Plan. The objective should therefore be amended to state:</p> <p>“Develop, promote and maximise the economic potential and benefits of the SOLDC designation at Biggin Hill through the creation of 2,300 jobs by ensuring that there is an appropriate supply of employment land and enhanced timely access to the airport within the parameters set by an Environmental Management Plan.”</p> <p>Built heritage objectives on page 20 – amend final bullet point to read “Encourage a proactive approach to the improvement and re-use of heritage assets and associated new development where it contributes to strategic, local planning and economic objectives.”</p>	Additional reference to business and employment to be added to Business and Employment vision.
Objectives – business and employment	1 individual	Council should ensure that its policies are not overly prescriptive as this is likely to hinder rather than support economic development, particularly in these difficult economic times. Proposals for retail warehousing or other commercial uses should be considered on their own merits and allowed when in appropriate locations. This flexibility should be applied to existing Business Areas such as the land owned by Legal and General Assurance Society Limited at Crayfields, for a variety of uses to provide employment generating floorspace, as well as other service functions such as crèche’s or health facilities.	The intent of the Borough’s Strategic Industrial Land and Locally Significant Industrial Sites is to support the retention and growth of Class B uses. These areas typically have lower market values than Town Centres, reflecting such uses. Proposals which include display and sales floorspace will be permitted, provided that those uses are clearly ancillary to a primary Class B use. Proposals which are primarily retail based should be redirected to Town Centres which have

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			infrastructure to support greater footfall
Objectives – business and employment	English Heritage	English Heritage - Objective 4, point 5, Biggin Hill – In view of the heritage significance of the airfield buildings, it would be appropriate to include the following change: ‘..whilst having regard to the accessibility, heritage significance and environmental constraints and opportunities’.	“heritage significance” added to objective.
Objectives – Town Centres	Beckenham Society	Suggest a third new bullet: “Ensure reasonable and sustainable parking charges as well as good access by alternative modes of transport”.	No amendment recommended. Parking charges cannot be set or controlled by Local Plan policies.
Objectives – Town Centres	1 individual	Support the continued improvement of Orpington ADD ‘and Beckenham’	Orpington is a Major Town Centre, as opposed to Beckenham which is one of five District centres. For clarity, the wording will be amended.
Objectives – Town Centres	1 individual	Support the second objective of the Local Plan in relation to town centres which remarks:- Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes	Support welcomed.
Objectives – Town Centres	Crystal Palace Triangle Planning Group	2 nd bullet point should include Crystal Palace District Centre	The bullet point is intended to refer broadly to all town centres including District centres such as Crystal Palace.
Objectives – design and the public realm	1 individual; Bromley Biodiversity Partnership/ Judith John Orpington Field Club	Design and the Public Realm objective 3.6 ii: insert, ‘with consideration given to biodiversity’ so it reads, Ensure development includes appropriate well planned private or public open space with consideration given to biodiversity.	No amendment recommended.
Objectives - Transport	1 individual	Add an objective: To examine routes already suffering a high volume of peak time traffic for innovative improvements to public transport at these times.	Not recommended for an objective. To be included in Local Implementation Plan.
Objectives - Transport	1 individual	Do not agree with the statements of fact here, e.g. ‘residents are helped to improve their own places and local environments for the benefit of all’. In my experience the Council resists residents’ efforts to make improvements to the environment even where in line with Bromley’s putative ‘Objectives’ as set out here. I’m speaking about traffic calming and the setting of 20mph speed limits on residential streets. Do not agree ‘Support improvements to public transport links’ should include ‘associated parking’ if this means ‘more parking’. Better to use regulations and traffic engineering to control traffic, reduce car use and speed up bus journeys. Reduce and reposition bus stops possibly. Give buses priority at traffic lights to speed up journeys. Introduce traffic calming and more cycle paths.	Noted No change recommended.
Objectives – Environmental Challenges	The Beckenham Society	Add to final bullet after “reduce air pollution” add “including aircraft noise and vapour”.	No change recommended. It is not necessary to list specific types of pollution.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Vision and Objectives

Respondent	Summary of issues	Officer comment
The Beckenham Society	The focus of the plan is housing without associated needs such as green infrastructure, to cater for the additional population.	It is acknowledged that the provision of green infrastructure is important in developing sustainable communities. The Borough is set a target for housing development in the London Plan which it is required to demonstrate can be delivered. Whilst this necessitates the allocation of development sites, all will need to meet standards for adequate amenity space. Larger developments will be expected to include new open space and play space to cater for new and existing residents.
The Beckenham Society	There is no attempt to proactively encourage Neighbourhood Plans. The Society is very keen to be a party to such proposals.	The Council is aware of its responsibilities to proactively encourage and enable Neighbourhood Planning. Whilst the immediate priority is the Local Plan, the Council will support approaches of interest for the development of neighbourhood fora and Neighbourhood Plans.
The Beckenham Society	Open Space and natural environment: No green urban spaces, town parks and greens, street tree planting schemes are included in the documents. The Council has resisted registration of Town Greens.	The existing open spaces in Bromley are valued very highly and it is intended that the Local Plan will continue to give them strong protection from harm through appropriate planning designations. The Local Plan development process has allowed changes to open spaces to be put forward and the new Local Green Space designation offers an additional opportunity for local communities to nominate important areas for additional protection.
The Beckenham Society	Business Opportunities: Conversion of offices to residential is contrary to the aim of employment opportunities. Newer residents would be welcomed if they were matched with local employment.	The Council has limited scope to prevent the changes introduced by central government giving permitted development rights for conversion of offices to residential. The Council has considered the possibility of an Article 4 Direction in the “Working in Bromley” section comments.
The Beckenham Society	Built (cultural) Heritage: Protection should be given to cultural heritage, e.g. the closure of the Orpington Heritage Museum, which should be reopened elsewhere such as the Beckenham public toilets. Assets of Community Value are not mentioned.	The Local Plan will contain a policy (drafted in the 2014 consultation document) similar to that in the UDP which is aimed to resist the loss of community facilities, wherever possible, unless it can be demonstrated that there are no prospective purchasers. It also requires alternative provision unless it can be shown that there is no longer a need for that particular use or other social infrastructure. Although the register of an Asset of Community Value is a system which exists outside the Local Plan process, it is mentioned in the 2014 consultation document and will be included in the Local Plan.
The Beckenham Society	Transport: An objective should be to encourage people to walk by redressing the balance between wheeled traffic - well paved footways, more crossings and junction improvements, pedestrian only areas in shopping streets etc	The current objectives are considered adequate.
CPRE London, London	Objections to the phrase “ensure that the Green Belt continues to fulfil its functions” because this can open the way for the removal of Green Belt sites that are perceived not to fulfil their functions. Change to “ <i>protect and enhance the green</i> ”	Amend to include “protect and enhance”

Wildlife Trust, various individuals	<i>belt so that it can continue to fulfil its function</i> Another suggestion: “ensure that Green Belt boundaries are not compromised” The Green Belt needs to be defended not eroded piece by piece	
Dr Judith John, Orpington Field Club	“Downe House” is misspelt in the Vision section	Error corrected.
Dr Judith John, Orpington Field Club	Open Space and the Natural Environment objectives: Additional text should be added – “land, air and water environments are sustainably managed <i>following guidance from the Bromley Biodiversity Plan...</i> ” The word “encourage” should be replaced with “ <i>promote</i> ” in “Encourage the protection and enhancement of biodiversity”	Generally the vision and objectives do not include reference to relevant guidance. It is suggested that a change is unnecessary as long as natural environment policies are clear about the relevance of the Biodiversity Action Plan.
Dr Judith John, Orpington Field Club	Health and wellbeing objectives: Suggests inserting ‘good quality greenspace’, so it reads, ‘Communities are served by local shopping parades, education, healthcare, leisure, community, biodiverse greenspace and cultural facilities, including libraries and places of worship.	An amendment is recommended to include “green space” with the list of social infrastructure.
Dr Judith John, Orpington Field Club	Design and the public realm objectives: Objective 2 add, <i>‘that promotes and enhances biodiversity.’</i> so it reads, ‘Ensure development includes appropriate well planned private or public open space that promotes and enhances biodiversity.’	Amend to include suggested text.
Dr Judith John, Orpington Field Club	Environmental Challenges objectives: Lines 1 & 2: Suggest amend 1st sentence to: “New development is designed <i>to enhance the character of the area, with greenspace provision that ensures environmental problems are not worsened and biodiversity is not reduced.</i> Suggest new Objective 6: <i>Ensure that new development includes greenspace provision which maintains and/or improves biodiversity.</i>	It is considered that the objectives in the Valued Environments section are adequate in covering the protection and enhancement of green space for the multiple benefits that it can provide.
1 individual	Health and Wellbeing objectives: Objects to the objective for Renewal Areas. This should be more proactive so that the Council recognises is role in enabling Renewal Areas to improve their own environments. Suggested rewording “Co-ordinate the improvement of Bromley’s designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities and encourage <i>and actively support</i> all communities to improve their own environments” Objects to community facilities objective. “resist” is not strong enough and not compliant with NPPF Para 70. Suggest adding “ <i>protect</i> existing facilities to ensure there is no net loss”	. It is considered that the draft Policies for Renewal Areas and Community Facilities set out in the 2014 consultation document provide as much support and protection as the Council is currently able to provide through the planning process.

1 individual	Concern over vision “moving around the borough will be easier due to reduced road congestion”. Residents parking on the street despite having adequate driveways - causing problems.	The Council acknowledges the difficulties caused by on-street parking in some areas. The parking strategy in the Getting Around section aims to ensure that off-street parking is maximised wherever possible.
1 individual	Scadbury Manor is on the English Heritage “at risk” register	Noted.
The Theatres Trust	Supports vision and objectives for Health and Wellbeing. There is no policy to support bullet point 4. The NPPF para 70 relates to safeguarding community and cultural facilities. New policy recommended: <u>The council will resist the loss or change of use of existing community and cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.</u> The Policy should also contain criteria for encouraging the provision of new facilities to serve the growing population in the borough.	It is considered that the draft policy for Community Facilities set out in the 2014 consultation document is in conformity with the NPPF in giving a high level of protection without restricting the redevelopment of genuinely redundant facilities.
1 individual	Business, employment and local economy objectives: The most important bullet point is no.6 (digital economy) this should be moved to the first point. A separate heading is needed which recognises that the digital economy determines where business and people locate.	The importance of the digital economy is acknowledged. However, the bullet points are not in order of priority and it is not considered this needs to be altered.
1 individual	Add to the Biggin Hill SOLDC objective – “...whilst having regard to the accessibility, environmental constraints <u>and amenity of those impacted by the operations and associated traffic</u> ” Transport objectives: Change the word “traffic” in the 5 th bullet point with “any means of transport”	It is considered that the current wording of the objective strikes an adequate balance between supporting the implementation of the SOLDC and recognising constraints. The policies for the SOLDC and the different areas of the airport will set out more detail about protections that can be provided through the planning process. The 5 th bullet point is intended to cover the street scene and road traffic. It is considered the appropriate section for impacts of other transport (noise, air pollution) is in the Environmental Challenges section.
1 individual	Open spaces should continue to be given high priority. Open spaces will become even more important for wellbeing and wildlife.	The Local Plan is intended to continue to protect Bromley’s open spaces wherever possible through the use of a range of protective designations and by locating development in appropriate locations.
1 individual	The draft plan is very general. More detail is needed.	The consultation document did not contain detailed policies – it was largely these were initially consulted on in 2014 and will be updated and incorporated into the Draft Plan.
1 individual	The proposed World Heritage Site in Downe should be recorded specifically	Noted. Clarification of the status of the WHS will be made in the Draft Local Plan.
Adrian Lawrence, Director Lanniston Developments	The consultation process has been undemocratic with decisions made by a few Members with a bias towards protectionism. The Green Belt boundary reviews only correct cartographic errors. A proper objective review of the quality of Green Belt land should have been	All consultation documents, in 2011, 2012, 2014 and 2015 were made available for all local Councillors and were taken through both Development Control committee and Executive which suggested amendments and approved the documents for consultation with local residents and other stakeholders. The Council is following the

	<p>undertaken. Green Belts need to fulfil their purpose not act as an anti-development tool.</p> <p>There is no mention of the current housing crisis or idea to help maximise housing supply in this borough.</p> <p>Building skyscrapers in the town centre is not the solution. Homes with gardens are needed.</p> <p>Small urban green spaces should be given greater protection while Green Belt should be considered for housing.</p>	<p>procedures set out in the Town and Country Planning Regulations 2012 in order to allow as many stakeholders as possible to have a chance to input and review the various stages of Local Plan development.</p> <p>The Council's strategy to meet the housing target set in the London Plan is consistent with both national and regional policy. The Government have been consistent in promoting previously developed land in urban areas ahead of open spaces in search for residential development sites and the London Plan states that the Mayor supports the current extent of the Green Belt. Bromley's Local Plan will ensure that it can deliver housing through a combination of allocated sites and windfalls without needing to develop in the Green Belt.</p> <p>The London Plan sets the target for housing supply in Bromley in response to the current high need for housing. The GLA's Strategic Housing Land Availability (SHLAA) takes account of the Borough's capacity and sets the supply target accordingly.</p> <p>The housing coming forward during the lifetime of the Local Plan will be a mixture and is not all to be provided in the town centre. Small development sites in more suburban locations will include appropriate family housing which responds to local character.</p> <p>It is considered that the planning framework set out in the emerging Local Plan will provide very strong protection for important local green spaces. As above, the Council demonstrates in its housing trajectory that the London Plan target can be met without needing to use or de-designate land in the Green Belt. The new Local Green Space policy provides an avenue for local communities to nominate precious open spaces for extra protection.</p>
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CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

SPATIAL STRATEGY

Responses to Draft Policies and Designations consultation 2014 – Update May 2016

Spatial Strategy

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Spatial Strategy	1 individual	Part of Crystal Palace triangle that belongs to Bromley (Church Road) should also be designated as a Major Centre. To not have it marked as a centre ignores the reality that it is. Merely because Croydon/Lambeth/Bromley each have a part of what makes the triangle does not mean that Bromley's contribution and recognition of Church Road as a Commercial centre is not needed. Much more co-ordination between the three Boroughs in this area is needed. The renewal area of Crystal Palace and Hayes are incorrectly numbered on the above map as 11 instead of 1, and vice versa. It should not be forgotten that for the renewal area of Crystal Palace, Croydon Council is also planning on designating its part of the Triangle as a Conservation Area	Crystal Palace centre was omitted from the map in error – it should be represented by a red dot. There are no plans to reclassify Crystal Palace as a Major centre at this time. The numbering of the renewal area map has been corrected.
Spatial Strategy – Projected housing map	Gregory Gray Associates on behalf of the Garden Centre Group owners of Keston Garden Centre	Refers to housing growth within Bromley Common and Keston (300-400 units).	For clarification the map referring to housing growth within Bromley Common and Keston relates to development with planning permission / allocated / prior approval (i.e. in this case relates largely to Blue Circle development not completed at Bromley Common).
Spatial Strategy – Projected housing map	English Heritage	With regard to the map on page 26, it is not clear how this has been generated, and whether it represents a statistical extrapolation based on population by ward, or a preferred future distribution. The plan process will need to consider reasonable alternatives, through the Sustainability Appraisal. We would expect that the final preferred distribution would reflect the environmental capacity for change within different parts of the Borough, to ensure that local distinctiveness and heritage are safeguarded and enhanced. We note that housing allocations will be included in the next Local Plan consultation at submission stage. The 'Call for Sites' (p29) suggests that the Council has not yet identified key development areas; once potential sites have been identified we would welcome early engagement to discuss how the Borough's site selection process will take account of the conservation of heritage assets, and their settings.	As stated above the map relates to schemes already granted planning permission / allocated/ with prior approval. The Council has taken into account comments from English Heritage on relevant potential site allocations.
Spatial Strategy – Projected housing map	The Beckenham Society	Page 26 (map): Compared to surrounding wards, the number of housing units for Copers Cope Ward (300-400 units) is too high. This Ward is already overflatted and a commitment to a higher than average number of new units will only exacerbate this.	See above – these are not additional units, but those with permission.
Spatial Strategy – Projected housing map	Transport for London	For example, the housing provision map on page 26 of the draft document doesn't seem to reflect the PTAL map on page 81. Keston and Bromley Common and Chislehurst wards seemed to be earmarked for more housing than Crystal Palace and Penge and Cator (both on the London Overground) and Orpington (designated a major town centre) wards.	See above – this does not show additional units, but those with permission.
Spatial Strategy – Projected housing map	Montagu Evans for Taylor Wimpey	Support key focus of Strategy to focus sustainable growth of retail, office, homes and leisure and cultural activities in Bromley Town Centre.	Noted.

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	(Conquest House)	Support identifying Bromley Town to project the most housing units in the Borough.	Reflects existing permissions and allocations.
Spatial Strategy	Mr Robert Taylor Landholdcapital	<p>Object to the methodology thus far used as the Spatial Strategy can only be decided once an objectively assessed figure for the overall housing target numbers has been produced. The revisions to the London Plan January 2014 produce increased housing numbers. Spatial strategy can only be considered once the overall level of homes required has been considered.</p> <p>Site allocations for the draft local plan can only be considered once the Draft Further alterations to the London Jan 2014 have been assessed for the Plan. Requirement for average annual housing supply monitoring targets 2015- 2025 should be 641 pa and min 10 year target 6413.</p> <p>Furthermore the Mayor has recently stated that the outer London Boroughs such as Bromley are falling behind in delivering their housing requirements.</p>	The draft Local Plan now reflects the London Plan 2015 and the updated housing supply target of 641.
Spatial Strategy Projected housing map	Dr Judith John Orpington Field Club; Ishpi Blatchley, Bromley Biodiversity Partnership	Spatial Strategy Map under Housing Growth The high level of housing provision suggested for Bromley Common & Keston (300-400 housing units) needs to take account of the Site of Metropolitan Importance: River Ravensbourne, Ravensbourne Valley Woodlands, Keston & Hayes Commons. This important wildlife area associated with the River Ravensbourne includes a SSSI in the south and forms a wildlife corridor into the town centre. There may also be opportunities to improve flood risk management along this corridor.	This could be relevant where there are associated planning conditions attached to existing permissions or through the delivery of allocated sites. As set out above the map relates to sites with planning permission / allocated sites or sites with S106 agreements to be signed at the time of publishing.
Spatial Strategy	Thames Water	<p>Thames Water seeks to be consulted on the Site Allocations document.</p> <p>To enable Thames Water to make a detailed assessment of the impact of proposed housing provision they would require details of the location, type and scale of development together with the anticipated timing of development. Thames Water's preferred approach for growth would be for a small number of large clearly defined sites to be delivered than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades. As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites. Further detailed considerations for sites set out in response.</p>	Thames Water were consulted and have responded to the 2015 consultation. Comments were received on the potential site allocations and have been taken into account.
Spatial Strategy – Renewal Areas	1 individual	Does Bromley have 21 'Places' or lots of places? This is an odd term. Perhaps 'Areas' would be better as a description of a large area – or group of wards.	No change recommended.
Spatial Strategy – Renewal Areas	The Chislehurst Society	Key to Renewal areas does not match the map. Chislehurst is shown as 8 in the key but the map shows Penge as number 8	Corrected
Spatial Strategy – Renewal Areas	The Beckenham Society	The numbers and place names in the key do not correspond to the true location of the places mentioned	Corrected

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Spatial Strategy

Respondent	Summary of issues	Officer comment
The Beckenham Society	<p>The District and local centres will not be “maintained and enhanced” by removing all their offices.</p> <p>A policy curtailing the expansion of restaurants and estate agents should be adopted in Beckenham.</p>	<p>The Council has limited scope to prevent the changes introduced by central government giving permitted development rights for conversion of offices to residential. The Council has considered the possibility of an Article 4 Direction in the “Working in Bromley” section comments.</p>
The Beckenham Society	<p>There are no Neighbourhood Plans in Bromley, the Crystal Palace one is a Lewisham initiative. The Council should have a policy to proactively encourage the community.</p> <p>Creating town and village greens to prevent development should be proactively supported.</p>	<p>The Council is aware of its responsibilities to proactively encourage and enable Neighbourhood Planning. Whilst the immediate priority is the Local Plan, the Council will support approaches of interest for the development of neighbourhood fora and Neighbourhood Plans.</p>
CPRE London	<p>Objects to the re-designation of Green Belt and/or MOL which do not refer to the need for a Green Belt review or the results of the council’s recent Green Belt review. The Spatial Strategy states that one focus is to “protect and enhance the Borough’s varied open spaces and natural environment” but then goes on to state that the review of the Local Plan is a time when Green Belt and MOL boundaries can be changed. This would normally happen after a Green Belt review which sets out whether spaces continue to fulfil the designated purpose. The borough conducted a review in 2012. No justification is given for generalised de-designation aside for identified needs which is not the same as “very special circumstances”.</p>	<p>The Green Belt (and other open space) boundary review in 2012 was to regularise the boundary and amend historic anomalies. It did not propose any changes for the purpose of development.</p> <p>Whilst the Council continues to give great importance to the protection of the open spaces which contribute to the character of Bromley it is also required to make provision for a number of needs including sites for travellers, housing, educational facilities and economic development. The preferred approach for all allocations is to use previously developed non-designated land, but this is extremely limited and in many cases the existing uses needing to be safeguarded or expanded are already within protected designations and cannot move elsewhere. It is considered that to make the Local Plan “sound” some re-designations are required i.e exceptional circumstances exist because there is an identifiable need and no alternative site.</p> <p>The methodologies for selecting sites, including why alternatives were rejected, are set out in the respective background papers – Travellers, Education, Housing and Mixed Use Site Assessments and the AECOM study on the Biggin Hill SOLDC.</p>
10 individuals	<ul style="list-style-type: none"> The Green Belt is under constant threat and erosion which affects the purposes for 	As above for CPRE London.

	<p>which it was established.</p> <ul style="list-style-type: none"> • Objections to the new and expanded education facilities, Biggin Hill Strategic Outer London Development Centre (SOLDC), and traveller site allocations. • New development should be accommodated within the non-Green Belt, non-MOL and non-UOS land. • The proposals are not exceptional circumstances. • Green Belt boundaries should not be changed in a general planning document but on an individual basis as opportunities arise • A Green Belt review has not taken place • Why weren't the areas proposed in this document not considered in the 2012 review? 	
Historic England	<p>Suggests that the "Focus for the spatial strategy" should include reference to the protection and enhancement of the Borough's historic environment as well as quality, and character of places.</p> <p>Recommends using text from the NPPF – Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and <i>net gains across all three</i>.</p> <p>Note para 14 of the NPPF – includes reference to heritage assets. It should be recognised that (for the purpose of site allocations) the presence of heritage assets influence the capacity of a site. The site assessment process only makes reference to Conservation Areas as a factor.</p>	<p>The draft Local Plan is updated to consider these comments.</p> <p>The site assessments included researching whether there were any locally or statutorily listed buildings, historic parks and gardens, Conservation Areas and ASRCs on or adjacent to sites.</p>
1 individual	<p>Supports Bromley Town Centre as a "focus for sustainable growth of retail, office, homes and leisure and cultural activities" which reflects national and regional policy.</p> <p>Supports achieving conformity with the London Plan with the increase in the annual housing supply target and the need for new housing to be located in sustainable locations, close to existing facilities and re-use brownfield</p>	Support welcomed.
1 individual	Biggin Hill Airport supports the focus of the Spatial Strategy	Noted.
1 individual	Bromley should support local volunteer groups to help protect and enhance open spaces	The Council encourages locally proactive groups such as Friends of Parks.
1 individual	Include the proposed World Heritage Site bid for Darwin's Landscape Laboratory to help guarantee greater protection for that environment.	There is no statutory requirement for World Heritage Site Tentative Listings to be considered in the draft Local Plan. However, the draft policies capture as far as possible the qualities of this area.

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

LIVING IN BROMLEY

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Living in Bromley – General

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Vision and Objectives	1 individual	Does Bromley have 21 'Places' or lots of places? This is an odd term. Perhaps 'Areas' would be better as a description of a large area – or group of wards.	"Places" considered to be applicable in describing the groupings shown.
Vision and Objectives	The Chislehurst Society	Key to Renewal areas does not match the map. Chislehurst is shown as 8 in the key but the map shows Penge as number 8	Where the Renewal Map is included the correct place name will be inserted.
Vision and Objectives	The Beckenham Society	The numbers and place names in the key do not correspond to the true location of the places mentioned	Where the Renewal Map is included the correct place name will be inserted.
Objectives - Health & Wellbeing bullet 1	1 individual	What are 'sustainable' lives? Define, omit or use a better word or phrase eg. 'with least damage to the environment'	Reference to infrastructure and sustainable lives within the objective considered to be appropriate.
Objectives - Health & Wellbeing bullet 2	1 individual	Re renewal area of Crystal Palace, Croydon Council plans to designate its part of the Triangle as a Conservation Area	Noted
Policy 5.2 Backland and Garden Land Development	Robinson Escott Planning LLP	<p>Policy is negatively worded and should be amended to state "New residential development will be permitted on backland or garden land where all of the following criteria are met."</p> <p>Supporting text "where locally justified by a sound local evidence base should be added to the sentence at the end of third paragraph that states "The London Plan supports."</p> <p>The sentence beginning "The Council will also resist" suggests blanket embargo on loss of private residential gardens at odds with the policy that indicates if certain criteria are met development will be permitted. Delete or redraft to accord with the terms of the policy.</p> <p>Same applies to fifth supporting paragraph that begins "Backland or garden development."</p>	Policy has been reworded to take representations into account.
Policy 5.2 Backland and Garden Land Development	English Heritage	<p>The potential impact of backland development on the historic significance of the layout of neighbourhoods, the established grain and spacing of buildings, plot boundaries and walls, should be acknowledged in the text. In addition, we suggest that part i) of the policy is expanded to cover this aspect, as follows:</p> <p>i) '...in relation to scale, design, density, grain and layout of the proposed development, or defining features such as heritage assets'</p>	Supporting text amended to make reference to form and layout.
Policy 5.2 Backland and Garden Land Development	The Beckenham Society	(ii) substitute "amenity space for "play space" i.e. the requirement for adequate space should not be age specific.	Reference made to amenity space and play space within clause 2.
Policy 5.2 Backland and Garden Land Development	1 individual	<p>Pg34 – 5.2 - Can we remove or reword the double negative 'no unacceptable impact etc' Eg 'the impact on ... is acceptable'? Objectors will no doubt say when something is unacceptable.</p> <p>Same comment applies if double negatives are used elsewhere in draft Local Plan.</p>	Criteria (i) considered to have more strength as drafted.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Policy 5.3 Housing Design	English Heritage	We welcome the references in this policy to the need to respect local character, spatial standards and physical context. It would be appropriate to include a specific reference to heritage assets as part of local character.	Reference made to heritage assets in General Design policy (Policy 8.1).
Policy 5.3 Housing Design	The Beckenham Society	Under (v): the further detail regarding parking standards should be a part of this consultation. Under (vi): suggest redraft to make clear that respect for local character should take precedence over London Plan densities e.g. “density that has regard to the London Plan density matrix whilst giving precedence to local density and character”.	Text in brackets removed. Proposals will need to accord with Parking Standards policy in Getting Around.
Policy 5.3 Housing Design	1 individual	I think the policy wording should be tighter by using ‘should’ or ‘shall’. This is a comment for the whole Plan.	Comment noted – strong policy wording is considered important. In this case it is considered that the wording has strength.
Policy 5.3 Housing Design	NHS Healthy Urban Development Unit	Welcome the policy and the use of the housing standards in the Mayor’s Housing Supplementary Planning Guidance which will help create good quality homes and healthy environments.	Noted.
Policy 5.3 Housing Design	Greater London Authority	As mentioned in the GLA’s previous representation, the GLA supports Bromley in seeking to retain its character. However, London Plan Policy 3.4 is clear that this should be done in a way that optimises housing potential. While the London Plan recognises the positive contribution of existing, lower density housing in lower PTAL areas to London’s overall economic and residential ‘offer’, it also encourages high density development in appropriate outer London locations such as larger town centres and places that benefit or will benefit from major new public transport improvements. Investment in high density housing is essential to contribute to the vitality and viability of its centres and support public transport improvements. The Further Alterations to the London Plan promotes Bromley Town Centre as a strategic Metropolitan town centre to realise capacity for new residential development in line with its status as a new Opportunity Area.	Additional text inserted in supporting text.
Policy 5.3 Housing Design	Transport for London	There appears to be no explicit policy link promoting higher density development in area of higher public transport provision (existing or proposed), although the Housing SPG density matrix is cited. The density link is more explicitly and consistently made to protection of amenity.	Additional text inserted in supporting text.
Policy 5.3 Housing Design	GL Hearn for Muse Development Ltd	Policy 5.3 (housing design) sets out at part (vi) that proposals should have regard to the London Plan density matrix. We would again confirm our support for this draft policy and comment that development densities should be maximised in areas with strong transport links.	Additional text inserted in supporting text.
Policy 5.3 Housing Design	West Beckenham Residents Association	It is essential that LB Bromley adopts design standards for Houses of Multiple Occupation. There are more and more applications for HMOs in Beckenham, but LB Bromley has no design standards and does not licence HMOs of two storeys or fewer. This local plan specifically omits HMOs from its design standards. Good design standards are essential for both the intended occupants of HMOs and their neighbours.	Policy 5.9 Residential conversions makes reference to HMOs.
Policy 5.3 Housing Design	Affinity Sutton	Pleased to see London Borough of Bromley’s ambition to achieve high standards in the	Noted.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
		<p>design and layout of all new housing.</p> <p>In the light of the positive decision from the recent DCLG review of housing standards, we support the Borough's intent to apply the London Plan minimum space standards across all tenure types. These and the careful application of Lifetime Homes standards (with LTH principles shaping the design of homes in a sensible pragmatic rather than a mechanical unthinking manner), should ensure that there is adequate space in new homes for residents at all points during their life course.</p> <p>Estimated levels of child density can only be indicative at a design occupancy stage, particularly for homes allocated for social/ affordable housing which are well known to have higher levels of occupancy than owner occupied properties. Provision of play space for 10 or more children appears to be a very low threshold, particularly where the distribution of age groups is unknown, and may have a negative impact on maintenance costs or the requirement of H&S checks for equipment in very small schemes. Assessment of what constitutes appropriate play provision needs to be related to the availability private gardens, and the proximity of nearby play facilities within the close neighbourhood, suggesting a neighbourhood level requirement rather than a scheme-by-scheme decision. A helpful definition of reasonable neighbourhood play provision can be found in the GLA's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) - which promotes the creation of shared public and communal spaces by adults and children at the same time. It provides benchmark standards on play requirements for all ages.</p> <p>http://www.london.gov.uk/priorities/planning/publications/shaping-neighbourhoods-play-and-informal-recreation-spg#sthash.PUifyfpo.dpuf</p>	<p>Support noted</p> <p>Text amended to refer to Mayor's SPG.</p>
Policy 5.3 Housing Design	1 individual	Some of the new housing stock has incredibly small gardens diminishing the character especially compared to older properties. This should be reviewed.	<p>Noted new housing developments can have smaller garden spaces compared to older properties.</p> <p>The importance of local character is set out in the draft Plan. Additionally each case is dealt with on its own merits and the need to take into account local, regional and national policy documents.</p> <p>Policy 5.3 as drafted sets out the need for schemes to result in good quality living environments including having adequate amenity space.</p>
Policy 5.8 Side Space	The Beckenham Society	Under 5.8 (i) "storey" should read "storeys"	Noted – amend (i) to read "storeys"

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
		<p>Under 5.8(ii) add a final sentence “This will be the case on some corner properties” It is important that corner properties provide more generous side space to avoid a cramped appearance by being too close to the boundary and, in some cases, also impacting on sight lines.</p>	<p>It is considered that (ii) as drafted accommodates the space standard that could be required on corner properties.</p>
<p>Policy 5.9 Residential Conversions</p>	<p>The Beckenham Society</p>	<p>(iii) add at the end of this sub-paragraph “.....nor affect the character or appearance of the area by, for instance, devoting front gardens wholly to parking”.</p> <p>There are conversions in the Borough where front gardens have been wholly devoted to parking. Whilst the text mentions the undesirability of parking in front garden areas this should be discouraged by strengthening the policy to be clearer.</p> <p>(v) suggest redraft to read “ there will not be a detrimental impact on the choice of family housing in the area.....”</p>	<p>It is considered clause (iv) covers concerns in relation to character and appearance.</p> <p>Concerns noted.</p> <p>It is considered clause (v) covers concerns as housing choice encompasses a range of unit sizes / types.</p>
<p>Policy 5.10 Conversion of non-residential buildings to residential</p>	<p>The Beckenham Society</p>	<p>Welcome and support the addition to the existing UDP Policy H12 in respect of controlling on street and off street parking.</p>	<p>Noted.</p>
<p>Policy 5.10 Conversion of non-residential buildings to residential</p>	<p>Copers Cope Residents Association</p>	<p>A policy on all Houses of Multiple Occupation (HMOs). There has been an increase of planning applications to convert properties into HMOs in Beckenham, stronger planning policies are required to ensure HMOs are of a descent standard. Other boroughs have such polices.</p>	<p>Policy 5.9 Residential conversions makes reference to HMOs.</p>
<p>Policy 5.10 Conversion of non-residential buildings to residential</p>	<p>Montagu Evans for London Square (Hayes Court)</p>	<p>Support 5.10</p>	<p>Noted</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Living in Bromley – General

Respondent	Summary of issues	Officer comments
Lanniston Devts Ltd	<p>Vision and Objectives</p> <ul style="list-style-type: none"> • Too much attention afforded to meeting housing numbers not housing mix; • Flats/skyscrapers will not leave a legacy to be proud of / lead to possible social problems; • Benefits of looking back on flagship music school and quality housing stock that could become future Areas of Special Residential Character (ASRCs) and Conservation Areas (CAs); • Need to identify land that can provide homes with gardens / close to public open spaces where a good quality of life can be enjoyed; • Importance of protecting public open spaces (i.e. Queens Gardens) and consider land designated for decades as Green Belt for housing; • Limited infilling on road frontages and within existing settlements within Green Belt should be adopted as policy to create windfall sites (other local authorities have these supplementary GB policies); • Decisions to allocate sites for possible devt. considered by a few members perhaps, with bias towards protectionism? • No mention of current housing crisis – argument that there is not enough land to provide homes that we need is not true; • Through the Local Plan (and Duty to Co-op) process Inspectorate expects authorities to review to see if there are suitable sustainable sites that can be released without damaging purposes of the GB; • Involve searching for sites on edges of existing villages/towns that can make use of (or fund improvements) to existing infrastructure (road networks, bus routes, schools and doctors surgeries); 	<p>Sites put forward during the call for sites process and previous consultations that are currently within protected designations, including Green Belt are not recommended for potential allocation for housing purposes. The Council's position is that Green Belt/MOL boundaries are only recommended for amendment where there are exceptional circumstances and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere.</p> <p>It is considered that new housing should be provided in sustainable locations other than Green Belt, as required in the NPPF.</p>
Indigo on behalf of Lands Improvement Holdings Griggs Cross Farm	<ul style="list-style-type: none"> • Housing Objectives not positively prepared to promote housing growth in sustainable locations. Do not acknowledge benefits new housing can have on population and economy • Suggested new Housing objectives: • <i>Support the delivery of new housing development on suitable sites wherever possible to help meet the identified housing needs of the Borough and the wider area, in particular in locations accessible to the identified employment areas;</i> • <i>Support the provision of new housing development in sustainable locations which have access to public transport, the Borough's cycling and walking network, local social/community facilities, and areas with employment opportunities;</i> 	<p>It is considered that the objectives as drafted adequately cover these matters.</p>
Crest Nicholson – The Drift	<ul style="list-style-type: none"> • Vision should also make reference to meeting OAN • Homes: "housing supply being tailored to local needs" should be amended to reflect wording in previous consultation document, included objective <i>"ensure there is an appropriate supply of homes to meet the varied needs of the local population"</i> 	<p>Objectives make reference to need.</p> <p>Objectives for last two consultation documents have the same text.</p>

Respondent	Summary of issues	Officer comments
	, which responds to changing demographics”	
Maddox Assoc on behalf of Iris Estates Home Builders Federation Historic England	Spatial Strategy <ul style="list-style-type: none"> • Release of land within Green Belt necessary to meet housing need in a sustainable manner; • Unclear on Plan period; • Ensure approach between Spatial Strategy and Living in Bromley chapter (including identification of sites and their resultant capacity) is consistent in terms of ensuring heritage quality and assets are considered. 	See comments above on Vision and Objectives. Plan period within the document was specified as 2015/16 – 2029/30. Noted.
1 individual Lanniston Devts Ltd	<ul style="list-style-type: none"> • In terms of looking proactively at GB boundaries need for homes and current housing crisis must be regarded as exceptional circumstances. Bromley capable of providing new villages/town yet these ideas have not been investigated; • Sites in MOL have previously been lost including accessible facilities – sites within the GB would be more suitable not involving the loss of existing facilities; 	See comments above on Vision and Objectives.
Crest Nicholson – The Drift	<ul style="list-style-type: none"> • Objective “New housing to meet the minimum 641 London Plan target should be provided in sustainable locations, close to existing facilities, and re-use brownfield sites” should be amended to “<i>and prioritise the re-use of brownfield sites</i>” • Fully support statement “<i>The preparation of the Local Plan is the time that the Green Belt boundaries can, if there are exceptional circumstances, be amended...the Council is seeking to amend the Green Belt only where there are exceptional circumstances, and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere</i>” 	More detail along the lines suggested is reflected in the draft housing supply policy. Support noted.
1 individual Lanniston Devts Ltd	<ul style="list-style-type: none"> • Plan failed to identify scale/mix of housing and range of tenures needed over plan period; • Need to cater for affordable homes to buy in response to Govt requests; • Local and central govt. politics not always aligned; • Need for LBB to address housing shortage by identifying sites for housing including looking at GB; • Need common methodology across all local authorities to meet housing need; • Plan treats 641 as a maximum figure; • Plan does not address housing need that people want and can afford – fails to identify supply of specific developable sites or broad locations for growth years 6-10 and 11-15 including mix of units; • Fails to identify sites for custom build, elderly, families and affordable homes; • Need for additional capacity for allocations as often not all planning permissions are deliverable. 	See comments above on Vision and Objectives. Recent Government initiatives including starter homes are referenced where appropriate in the draft affordable housing policy. The borough participates within London-wide Strategic Housing Land Availability Assessments periodically which uses a common methodology for all London boroughs. The draft Housing Supply Policy refers to ‘minimum of 641 additional homes’. Additional sites have been included in the housing trajectory for the Plan period, including consideration of broad locations, allocations and windfall sites. Housing units included are compared against cumulative housing targets.

Respondent	Summary of issues	Officer comments
Indigo on behalf of Lands Improvement Holdings Griggs Cross Farm	<ul style="list-style-type: none"> • Focused heavily on Bromley Town Centre. Sites around area struggled to redevelop in 5 years since Area Action Plan release. Must be more flexible in providing balanced growth across the Borough • Logical extension of strategy to promote Cray Business Corridor and Biggin Hill Strategic Outer London Development Centre would be to promote sustainable housing growth in close proximity 	<p>Bromley Town Centre is recognised through the BTCAPP and its designation as an Opportunity Area is important in the future delivery of housing throughout the Plan period. See also below comments in response to the GLA on Housing Need and Draft Housing Supply Policy.</p> <p>See also site representation response.</p>
Montagu Evans on behalf of London Square Bassetts Campus	<ul style="list-style-type: none"> • Broadly support strategic objectives and feel Bassetts Campus can play an important part in meeting these. Consider increased capacity on site is a significant benefit in achieving housing targets in draft Local Plan. 	<p>See site specific representation response.</p>
1 individual Home Builders Federation	<p>Duty to Cooperate</p> <ul style="list-style-type: none"> • Emerging Plan appears weak on the question of duty to cooperate; • Would be helpful if the Plan gave attention to work with other authorities to develop common approaches to issues of cross-border significance; • Council will need to demonstrate how it has discharged the duty to cooperate in relation to planning for housing needs with its neighbours; • Opportunity for Bromley to work closely with Sevenoaks and Tandridge Council; • The Plan does not address the need to close the gap between need and supply in London as a whole (cross boundary issue - 7,000 dwellings per annum); • As part of the South sub region identified in Map 2.1 of the London Plan, would be interesting to learn if any joint studies have/will be commissioned with other south London boroughs to explore opportunities for additional housing supply and how any unmet housing needs are to be addressed in the sub-region; • Planning Inspectorate expects authorities with Green Belt to review the boundaries to see if sites can be released to meet the housing need. 	<p>The Council currently participates in regular Duty to Cooperate meetings with other south London boroughs. These include a range of subject matters including Housing and a memorandum of understanding regarding housing numbers and other comments will be progressed between the boroughs.</p>
Greater London Authority Bromley Labour Group NLP on behalf of Tescos – Edgington Way NLP on behalf of Development Securities PLC World of Golf Chris Francis – West	<p>Bromley's Housing Need</p> <ul style="list-style-type: none"> • Mayor welcomed completion of the Strategic Housing Market Assessment for the South East London sub-region which estimated net additional dwelling requirement for Bromley as 1300 units / annum. More recent household projections set out in Mayor's Draft Interim Housing SPG show Bromley's households set to increase by between 1779-1822 homes/year. • Suggests significant gap between housing need and identified supply in Bromley which Policy 3.3Da requires boroughs to seek to close. • Note LBB have decided not allocate any GB land for housing. Targets based on earlier SHLAA based assessment that limited development needs to those which did not require GB releases rather than the larger target which emerges from objectively assessed need. • NPPF requires LPAs to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing as far as is consistent with the policies in the Framework; • Reference made to paras 47 and 159 of the Framework relating to housing need 	<p>It is noted that the borough needs to be able to demonstrate that all possible sites/sources have been looked at in terms of helping to close the gap between housing need and the minimum London Plan annual housing target figure.</p> <p>Consideration has been given to the inclusion of specific sites/sources to be included in the housing trajectory for the Plan period (and their anticipated phasing timescale) including; broad locations, allocations, large windfall sites, the small site allowance and other sources. The trajectory sets out anticipated timescales for specific sites and locations.</p> <p>The draft housing supply policy has been amended to reflect the role that potential allocations and broad locations will play in meeting the minimum housing target for the</p>

Respondent	Summary of issues	Officer comments
<p data-bbox="91 134 226 158">& Partners</p> <p data-bbox="91 193 338 312">Robinson Escott Planning (see below for sites represented)</p> <p data-bbox="91 347 344 432">Woolf Bond Planning on behalf of Taylor Wimpey</p>	<p data-bbox="427 134 595 158">and evidence;</p> <ul data-bbox="383 165 1402 376" style="list-style-type: none"> <li data-bbox="383 165 1402 248">• Housing delivery matter of national priority (as demonstrated by DCLG statements) and more recently reference has been made to a national housing crisis; <li data-bbox="383 256 1256 280">• Soundness criteria within the NPPF referred to (47, 50, 154, 156-159); <li data-bbox="383 288 1402 376">• Above supplemented by NPPG – “the local plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered”. 	<p data-bbox="1429 134 2136 185">Borough and helping to close the gap between targets and need.</p>
<p data-bbox="91 442 293 466">Croydon Council</p>	<ul data-bbox="383 442 1402 624" style="list-style-type: none"> <li data-bbox="383 442 1402 501">• Is Bromley saying its unmet housing need is being met elsewhere in SE London (South East London Housing Market Area?); <li data-bbox="383 509 1402 624">• Concerned provision of homes elsewhere in SE London may not meet unmet need if homes provided are not of the type and size needed in Bromley. As there is a net inflow of households from Bromley to Croydon we wish to be clear whether you may ask Croydon to meet your unmet need; 	<p data-bbox="1429 442 1951 466">See comments above on Duty to Cooperate.</p> <p data-bbox="1429 501 2136 584">The draft housing supply and affordable housing policies have been amended to make reference to the level of need in the future for different unit sizes.</p>
<p data-bbox="91 751 271 802">Home Builders Federation</p>	<ul data-bbox="383 751 1402 1153" style="list-style-type: none"> <li data-bbox="383 751 1402 834">• Unclear on how the Borough has/or in the process of assessing local needs more thoroughly / identifying capacity for additional supply (i.e. inkeeping with Part DA of Policy 3.3 of the London Plan); <li data-bbox="383 842 1402 925">• If some London boroughs are unable to meet London Plan targets (i.e. Southwark in its emerging Plan unable to meet 3000/annum and instead 2,000/annum is cited) LBB will need to engage with neighbouring boroughs; <li data-bbox="383 933 1402 1042">• A sub-regional SHMA with Bexley, Southwark, Lewisham and Greenwich would seem logical and the next iteration of the Local Plan should appraise any unmet needs of neighbours / those boroughs where there is an historic strong net migration flow; <li data-bbox="383 1050 1402 1153">• 2012 DCLG Household Projections indicate for a Plan period 2015 – 2025 1,700 households/annum and for 2015 – 2030 1,733 households/annum (London Plan target of 641 much lower than DCLG projection); 	<p data-bbox="1429 751 1951 775">See comments above on Duty to Cooperate.</p> <p data-bbox="1429 810 2136 861">A sub-regional SHMA is periodically carried out with Bexley, Lewisham, Southwark and Greenwich.</p>

Respondent	Summary of issues	Officer comments
1 individual	<ul style="list-style-type: none"> • Predict and provide circular argument and self-fulfilling prophecy – housing and/or population has grown in recent years, predict it will grow at a certain rate in the future, so make targets to build that housing – then repeat. • On a finite land mass housing density will unacceptably increase at the expense of quality of life. • Unfettered growth is not necessarily good or desirable – some of the most desirable parts of the borough, London or the UK are where there is low density and town cramming is not taking place. 	Comments noted – The draft Local Plan needs to take into account current and future needs and be in conformity with national and regional planning policy. This includes providing for housing need whilst also respecting and taking into account other policy areas.
3 individual	<ul style="list-style-type: none"> • Housing should be a very important priority for any local plan by Bromley Council. Like elsewhere in London there is a housing shortage in Bromley. There should be building of new, smaller and affordable places – mainly to rent – for local residents – in addition to renovation of existing properties. Investment would have benefit of more local employment and apprenticeships. • Keep green areas and build on brown sites. Plenty of housing being created – just stop overseas buyers hogging it all at expense of green areas (which makes UK and London desirable places to live. • I live in Islington – less open space per head of population than anywhere else in the country. If we can find brownfield sites so can LB Bromley. Please don't do away with our countryside – it's there for all Londoners to enjoy. 	<p>Noted. The policies as drafted aim to reflect national and regional guidance in relation to prioritising previously developed land for housing.</p> <p>The housing policies include information relating to need for different sized units and aim to ensure a mix of unit sizes are provided within larger schemes.</p>
Greater London Authority	<p>Draft Housing Supply Policy</p> <ul style="list-style-type: none"> • Mayor welcomes the inclusion of Bromley's new minimum housing monitoring target of 641 additional homes per annum as set out in Table 3.1 of the London Plan (2015). • Proposed draft does not meet requirements of London Plan Policy 3.3D and 3.3Da. Proposed 'Amended Draft Housing Supply Policy' notes the 641 figure is a minimum figure. • To be in conformity the borough needs to demonstrate how it will meet and exceed this figure to seek to close the gap between need and supply in accordance with LP Policy 3.3 (Increasing Housing Supply). • Minimum targets are designed to provide authoritative and convenient starting point for development of local housing targets with proportionate updating and refinement required at borough level. To address need (LP and NPPF para 14 and 47) targets will have to be supplemented from types of location outlined below. • Policy 3.3E of the London Plan sets out measures that could lead to additional development capacity. Locations include; town centres, opportunity areas, surplus industrial, commercial and public land and other large sites (i.e. near 	<p>Noted.</p> <p>It is noted that the borough needs to be able to demonstrate that all possible sites/sources have been looked at in terms of helping to close the gap between housing need and the minimum London Plan annual housing target figure.</p> <p>Consideration has been given to the inclusion of specific sites/sources to be included in the housing trajectory for the Plan period (and their anticipated phasing timescale) including; broad locations, allocations, large windfall sites, the small site allowance and other sources. The trajectory sets out anticipated timescales for specific sites and locations.</p> <p>The draft housing supply policy has been amended to</p>

Respondent	Summary of issues	Officer comments
	<p>transport nodes). These locations, due to size, character, accessibility means there is scope for higher density development towards top of or in exceptional circumstances above density ranges set out in London Plan.</p> <ul style="list-style-type: none"> • Extent to which additional housing can be accommodated in these locations needs to be explored with consideration given to potential improvements to public transport across the borough (highlighted in Mayor's London Infrastructure Plan 2050). • Reference is made to the Inspector's report for the FALP which the borough is using to justify meeting only the minimum targets in Table 3.1. Mayor did not accept this finding and Policy 3.3 requires boroughs to address the gap between need and supply (accepted by SoS and London Assembly). 	<p>reflect the role that potential allocations and broad locations will play in meeting the minimum housing target for the Borough and helping to close the gap between targets and need.</p>
<p>Maddox Assoc on behalf of Iris Estates</p> <p>GVA Planning for Purelake New Homes</p> <p>Indigo on behalf of Lands Improvement Holdings</p> <p>NLP on behalf of Tescos – Edgington Way</p> <p>NLP on behalf of Relta Ltd – Land to the rear of Former Dylon (Footzie)</p> <p>Chris Francis – West & Partners</p>	<ul style="list-style-type: none"> • Note the inclusion of draft policy for provision of a minimum of 641 additional homes per annum over the 15 year Plan period; • Minimum figure should be augmented with additional housing capacity to reduce gap between local and strategic housing need and supply; • Para 47 of NPPF specifies LPA's should seek to meet housing requirements based on objectively assessed need; • Need within the Borough in the order of 1404 dwellings per annum (SEL SHMA 2014); • Need for delivery of double the target; • NPPF specifies an additional 5% buffer to ensure choice and competition in the market for land; • Full review of potential urban extension sites within the Green Belt should take place as the figure could not be delivered on previously developed sites alone; • For reasons set out in Housing Land Supply Trajectory Critique prepared by NLP for Relta Ltd it is not accepted that the amended policy will meet, let alone exceed, the minimum requirements of the London Plan and that additional sites should be allocated. Critique concludes there are inaccuracies in components of supply as set out in Housing Supply Trajectory. Include factual errors, unrealistic windfall allowance, insufficient lapse rate in respect of sites with planning permission and allocations. Adjustments necessary decrease supply by 1313 dwellings – increases to 2305 if more appropriate headroom is applied. 	<p>See above comments in response to the GLA on Housing Need and Draft Housing Supply Policy.</p> <p>Areas of common ground in relation to NLP Review identified during public inquiry into the Footsie site, Worsley Bridge Road.</p>
<p>Montagu Evans on behalf of Taylor Wimpey</p>	<ul style="list-style-type: none"> • Support revised Policy; 	<p>Noted.</p>
<p>Croydon Council</p>	<ul style="list-style-type: none"> • Interested in evidence behind target of 641 that is in line but does not exceed LP requirements; • Have LBB identified sufficient sites to exceed the target in Town Centres and 	<p>Noted. See above comments in response to Greater London Authority on Housing Need and Draft Housing Supply Policy.</p>

Respondent	Summary of issues	Officer comments
	<p>Renewal Areas?</p> <ul style="list-style-type: none"> • Croydon propose to enable new homes through sustainable growth of most accessible suburbs and evolution in others where conversions, additional homes on plots, infill or redevelopment are encouraged – amount cannot be quantified but to will help to meet some need / reduce pressure on other LPAs to meet unmet need; • Croydon are making it easier to develop mixed use employment and residential devts on locally important employment sites across the borough. Approach proposed in LBB is less encouraging of similar types of devt; • In the circumstances where LBB is not meeting its need for new homes all options should be explored before approaches are made to other LPAs about meeting unmet need; • Note promotion of extension of DLR to Bromley – should resultant growth not be planned for? • Use of word “suitable” in many clauses. Concerned it could be used to constrain residential in locations where in light of need development should be encouraged; 	<p>Noted – concern that future housing units include good quality accommodation that meets the needs of future occupants and existing neighbouring properties.</p>
London Borough of Bexley	<ul style="list-style-type: none"> • Broadly welcome Policy, however the housing trajectory for 2020/21 onwards does not identify a sufficient 5% buffer; • LB Bexley preparing evidence base for new Local Plan and unable to meet shortfall in Bromley’s identified housing need. 	<p>Trajectory compares GLAs minimum target with +5% buffer.</p>
1 individual	<ul style="list-style-type: none"> • Should renewal areas not form an important part of the draft Local Plan as they are mentioned? 	<p>Renewal areas are considered to be suitably referenced in the draft Local Plan.</p>
1 individual	<ul style="list-style-type: none"> • Regarding point (ii) LBB needs to take care not to create imbalance between housing and commercial buildings in town centres such as Beckenham; • New developments need to meet DCLG’s Technical Housing Standards. 	<p>The draft Local Plan reflects the evidence base on housing and economic matters. The need to meet the appropriate housing standards is reflected in draft local plan policies relating to housing design matters.</p>
1 individual	<ul style="list-style-type: none"> • A secure mechanism should be in place to ensure that building work is given priority on brownfield sites not greenfield ones; 	<p>Reference is made within the draft policy supporting text to the need to consider other policies – i.e. development on brownfield land.</p>
<p>Greater London Authority</p> <p>NLP on behalf of Tescos – Edgington Way</p>	<p>Housing Land Supply Position</p> <ul style="list-style-type: none"> • To ensure general conformity Bromley will need to show in its Local Plan, a housing trajectory and/or supporting evidence that seeks to identify and bring forward extra housing capacity (pro-active and targeted reappraisal of boroughs SHLAA findings drawing on scenario tests supplemented by more local sensitivity testing). • Mayor’s previous letter considered there is insufficient evidence to justify proposed trajectory of 10054 units. Concern that small site figure of 4790 units includes 	<p>Consideration has been given to the inclusion of specific sites/sources to be included in the housing trajectory for the Plan period (and their anticipated phasing timescale) including; broad locations, allocations, large windfall sites, the small site allowance and other sources. The trajectory sets out anticipated timescales for specific sites and locations.</p>

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	<p>sites that are 9+ units and possibility of double counting (<u>small sites may also be included in broad locations projection</u>) requiring robust methodology for trajectory. NPPG paragraph 24 states windfall allowance may be justified in five year supply estimates based on compelling evidence. Suggests windfall allowance can be included in broad locations on same evidential basis.</p> <ul style="list-style-type: none"> Unclear where 900 units outlined in trajectory as broad locations within Bromley Town Centre will be delivered. London Plan 2015 identifies BTC as an Opportunity Area (2,000 jobs and 2,500 homes). It could also be a potential Housing Zone. Area represents significant capacity to accommodate new housing, commercial and other development. To address general conformity concerns over borough's draft housing policies, strategic and local ambitions for the TC could be recognised and developed more effectively through Local Plan. Minimum level of new housing of 641 dwellings – this level is above the estimated residential completions for 2013/14 (600 dwellings) and average historical completion rates for 2007/08 – 2012/13 (605 dwellings) indicating additional residential sites required to meet minimum targets. 	<p>Small site figure for years 1-5 takes into account the fact that some listed sites were smaller than 0.25ha.</p> <p>A small site windfall allowance has been incorporated in light of 2013 SHLAA evidence and past rates of delivery on these sites that feeds into the borough's target figure.</p> <p>Broad locations – Trajectory lists these potential sites as large and refers to Bromley Town Centre, Orpington Town Centre and other areas where large scale retail exists. Review of Bromley Town Centre Area Action Plan will be carried out in the near future.</p> <p>See above response to GLA.</p>
<p>Maddox Assoc on behalf of Iris Estates</p> <p>Indigo on behalf of Lands Improvement Holdings Griggs Cross Farm</p> <p>NLP on behalf of Relta Ltd – Land to the rear of Former Dylon (Footzie)</p> <p>Chris Francis – West & Partners</p>	<ul style="list-style-type: none"> Strategic Housing Land Availability Assessment (2013) identified total capacity of 6413 dwellings (2015 – 2025). 2892 dwellings on larger sites and 3521 units on small sites. Reliant on large proportion of windfall sites – Council has provided no compelling evidence that such sites have consistently become available. Housing completions in 2010 – 2015 have only met the target of 641 in two of the five years (June 2015 5 Year Housing Supply Paper). Council failed to take account of observations of the Inspector into the 2006 UDP that Bromley should correct underperformance in respect of housing delivery – including looking at open space designation boundaries and allocating a number of sites within the GB for housing if necessary. OAN is far greater than the target proposed – it is considered a review of boundaries is therefore necessary. Over-emphasis on high density town centre development that cannot always deliver the mix of housing to meet local needs – i.e. families. Considers LBB's supply for 5 and 15 years is inadequate. LBB does not adequately provide for an additional buffer of 5% of the housing target to ensure choice and competition under the NPPF; See reference in Housing Supply Policy to NLP representations (Critique and Five Year Housing Supply Review). 	<p>It is considered that the Council's Five Year Housing Supply Paper (June 2015) sets out the Council's position for the first five years of the Plan period. The Council's position is updated annually and therefore is subject to change (update expected Sep 2016).</p> <p>See also above comments in response to Greater London Authority on Housing Need and Draft Housing Supply Policy.</p>
<p>Historic England</p>	<ul style="list-style-type: none"> Clarify robustness of SHLAA and assessment of heritage matters in determining capacity of sites to deliver housing target for the Borough. 	<p>Heritage matters have been taken into account during the site assessment process and will continue to inform any future assessments.</p>
<p>1 individual</p>	<ul style="list-style-type: none"> The consultation document fails on OAN and soundness in relation to housing provision and economic strategy, affordable housing provision; 	<p>See also above comments in response to Greater London Authority on Housing Need and Draft Housing Supply</p>

Respondent	Summary of issues	Officer comments
	<ul style="list-style-type: none"> Further work needed on ongoing five year housing land supply and the provision of a Housing Options Paper. 	<p>Policy.</p> <p>It is considered that the Council's Five Year Housing Supply Paper (June 2015) sets out the Council's position for the first five years of the Plan period. The Council's position is updated annually and therefore is subject to change (update expected Sep 2016).</p>
Network Rail – Bromley North and Land adj. Bickley Station	<ul style="list-style-type: none"> Increasing densities at Bromley North and Land adj. Bickley Station consistent with the densities (600-800 and 50 dwellings) contained within the London Plan and general policy promotion and guidance in highly accessible areas. Relates to Govt. push to maximise delivery of new homes on brownfield land. 	Noted – see also above comments in response to Greater London Authority on Housing Need and Draft Housing Supply Policy and site specific representation tables.
Boyer Planning on behalf of NHS Property Services – Bromley North Station /Clinic	<ul style="list-style-type: none"> Council continues to rely on windfall sites – importance of the site in meeting housing targets. 	Noted – see also above comments in response to Greater London Authority on Housing Need and Draft Housing Supply Policy and site specific representation tables. See also responses under Housing Trajectory Table.
Travis Perkins – Gas Holder Site Homesdale Road	<ul style="list-style-type: none"> Proven need for housing in London – however importance of appropriate designation to accommodate necessary business uses on site to support construction sector. 	See site specific response to Gasholder Site Homesdale Road.
Maddox Assoc on behalf of Iris Estates	<p>Housing Trajectory Table</p> <ul style="list-style-type: none"> Undue reliance on unidentified windfall sites to meet target. Target falls a long way short of OAN (Objectively Assessed Need) set out in the SEL SHMA 2014. Note delivery of 1827 units within Bromley Town up to 2030 – request this provision is a minimum in light of the Framework's need to boost significantly the supply of housing; 	The inclusion of windfall sites within the trajectory is in light of the borough small site target cited in the 2013 GLA SHLAA (352 units per annum out of a total of 641 units), historic delivery rates of small sites and advice set out in paragraph 3.19A of the London Plan. This is also reflected in the latest Five Year Housing Supply Paper (June 2015) for the borough – update expected Sep. 2016.
Montagu Evans on behalf of Taylor Wimpey Bromley Labour Group	<ul style="list-style-type: none"> Number of residential units allocated to BTC are too low in light of its allocation as an Opportunity Area (minimum 2500 new homes) – essential Local Plan reflects this and gives clarity on how this is to be achieved including where appropriate site allocations; Some sites unrealistic (i.e. Land adjacent to Clock House Station) and omits Penge and Cator where there are known sites. No information on types of units proposed and whether they meet local needs. 	<p>See above comments in response to Greater London Authority on Draft Housing Supply Policy.</p> <p>Noted – updated trajectory reflects up to date position on individual sites, for example Clockhouse Station omitted.</p>
GVA Planning for Purelake New Homes	<ul style="list-style-type: none"> Allocated sites only deliver an additional 605 dwellings suggesting unsustainable reliance on existing sites with permission/ commenced/windfalls. Reliant on 2013 SHLAA for windfall figure, question whether previous rates can be achieved as only 356 units small sites are set out in the Paper. 	See above comments in response to Greater London Authority on Draft Housing Supply Policy.
Robinson Escott	<ul style="list-style-type: none"> Some sites nearly complete, resulting in a deficit 	Noted that the trajectory is a live document with units

Respondent	Summary of issues	Officer comments
Planning	<ul style="list-style-type: none"> Individual units for each site should have been listed 	<p>constantly being delivered and other sites being capable of being added if deliverable / developable.</p> <p>Updated trajectory (will appear as part of evidence base) will include individual sites.</p>
Beckenham Society	<ul style="list-style-type: none"> Page 42 covers Copers Cope – all 6 sites have permission or development is completed / underway. Column 15/16 is therefore not accurate in recording 332 dwellings unless completion occurs in 2016. Total column gives a false impression for Beckenham as more offices might be converted to residential. Danger other urban open spaces (i.e. Kent County Cricket Ground) might be earmarked additional housing 2019/2020 – 2029/30. Threat that former Natwest Sports Ground, SEGAS and Maybrey will be utilised to reach 641. 	<p>It is possible that further units could apply to the ward during the different phases of the Plan period.</p> <p>For current open space designations see comments above for Vision and Objectives</p>
1 individual Indigo Planning on behalf of Lands Improvement Holdings Griggs Cross Farm	<ul style="list-style-type: none"> Includes 300 units for vacants returning to use – London Plan explicitly excludes from minimum housing targets. Delete vacant units from trajectory 4,454 dwellings should be discounted from 15 year figure. 53 units to approvals to reflect consent at Town Hall site (and remove site as a Bromley Town Centre Area Action Plan allocation) 127 units from approved/pending projection approvals of less than 9 units to account for identified lapse rate 160 units from proposed allocations due to deliverability question marks Housing supply figures are subjective, the supply of small sites will reduce, need proactive identification of sites; 1,420 units from Area Action Plan allocations due to deliverability question marks 300 units from re-occupation of vacant units 250 units prior approval projections 3,520 from windfall sites for latter years of the plan in line with Planning Policy Guidance paragraph 24 	<p>Vacant units returning to use after 6 months are included in the GLA's monitoring of annual housing supply figures.</p> <p>Trajectory has been updated to reflect recent permissions / assumptions for allocations. Completion data for 15/16 will be incorporated. Updated 5YHLS expected September 2016.</p> <p>See above comments in response to Greater London Authority on Draft Housing Supply Policy.</p>
Fairview New Homes Ltd – Orchard Lodge	<ul style="list-style-type: none"> From 2020 to 2030, housing delivery shortfall of 190 units (shortfall across the plan of 60 units) No guarantee to deliver housing within timescales identified 	<p>See above comments in response to Greater London Authority on Draft Housing Supply Policy.</p>
1 individual	<ul style="list-style-type: none"> Previously objected to County House conversion; Best use of Land adj. Clockhouse Station is as car parking and drop-off space for station – would be poor quality site for residential; Outline permission for Crystal Palace Park should not be implemented. 	<p>Comments noted – Clockhouse station proposal site omitted.</p>

Respondent	Summary of issues	Officer comments
<p>Daniel Watney on behalf of Prime Place</p> <p>Daniel Watney on behalf of Fairworth Gospel Hall Trust</p> <p>GVA Planning for Purelake New Homes</p> <p>Robinson Escott Planning (see below for sites represented)</p> <p>Indigo Planning on behalf of Lands Improvement Holdings Griggs Cross Farm</p> <p>NLP on behalf of Tescos – Edgington Way</p> <p>NLP on behalf of Relta Ltd – Land to the rear of Former Dylon (Footzie)</p> <p>Chris Francis – West & Partners</p>	<p>Five Year Housing Supply Paper (June 2015)</p> <ul style="list-style-type: none"> • Looking at completions since 2004 LBB would have failed to have met 641 units/annum 5 times out of 10 years; • If 5% buffer was added to 641 (673) LBB would have not met the target for the last 5 years and only twice in the last decade; • 2009 – 2014 completions average 608 units (significantly below 641 target); • Therefore unlikely to meet revised target without maximising devt. potential of allocations i.e. Bromley North; • Number of units proposed to be delivered via small windfall sites unrealistic – increase from 195 – 352 since 2009 through the GLA SHLAA. No evidence seen to suggest an 80% increase is achievable; • Reference made to LBB concerns during the FALP Examination and evidence suggesting a lower figure should be used for small windfall sites for the Borough (i.e. using last four years of evidence of small site completions = 300 units per annum); • A reduction in small site allowance target to 300 would result in shortfall of 260 units that will need to be delivered elsewhere i.e. on larger allocated site such as BNS); • Having reviewed housing completion figures since 1996 LBB suffer from a significant historic cumulative housing delivery deficit of 1063 units further inhibiting their ability to demonstrate a five year housing land supply; • Although the deficit has accumulated over the lifetime of 4 Plans / 4 housing targets the need remains; • Using the Sedgefield Method of allowing for any shortfall to be met within 5 years results in a deficit of 213 units per annum over the next 5 years; • Housing target for the Borough should be 897 units is a 5% buffer is used; • Therefore delivery of housing throughout the Borough should be maximised on allocated sites such as Bromley North Station; • Doesn't accurately reflect current situation; • 43% identified supply from sites without planning permission – Indigo estimates 376 homes should be discounted from first five years therefore Plan does not accord with para 47. • LBB purports to have a 5.15 years HLS. Analysis indicates that the supply falls well short of this minimum supply threshold and Council is failing to plan for delivery of sufficient housing through allocations. Instead relying on substantial unidentified windfall sites. • See reference in Housing Supply Policy to NLP representations (Critique and Five Year Housing Supply Review). 	<p>It is considered that the Council's Five Year Housing Supply Paper (June 2015) generally sets out the Council's position for the first five years of the Plan period in addition to any historic housing shortfall.</p> <p>The Council's position is updated annually and therefore is subject to change – the trajectory has been updated to reflect the latest position on sites and an updated five year housing supply paper is scheduled for September 2016. Completions for 15/16 to be incorporated into draft Local Plan trajectory / evidence base.</p> <p>See also above comments in response to Greater London Authority on Housing Need and Draft Housing Supply Policy.</p> <p>See reference to areas of common ground / Footsie public inquiry above.</p>
<p>Woolf Bond Planning on behalf of Taylor Wimpey</p>	<ul style="list-style-type: none"> • Only marginal surplus demonstrated – therefore further consideration needs to be given to consider suitability of Green Belt land; 	<p>See above and comments on Vision and Objectives.</p>
<p>Home Builders Federation</p>	<ul style="list-style-type: none"> • Paper is largely theoretical as it is derived from the GLA SHLAA – sources of supply not reliable (1100 on small windfall sites, 250 from office to residential PD, 	<p>Reference should be made to the Council's Five Year Housing Supply Paper (June 2015).</p>

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	<p>100 vacant units) – only 70 units on allocated sites.</p> <ul style="list-style-type: none"> Blue Circle decision supported release of GB due to lack of 5 year housing supply and lack of implementation strategy. 	<p>Important to consider the exact context within which the decision for Blue Circle was made (i.e. during a period of housing delivery shortfall).</p>
<p>Crest Nicholson – The Drift</p>	<ul style="list-style-type: none"> LBB’s latest 5-year housing supply only projects under 700 dwellings per annum, even these assumptions are fragile. Over-reliance on long standing stalled sites, unidentified windfall sites Does not identify year on year delivery of each listed site 	<p>See above in relation to Council’s position on first five years of the Plan period.</p> <p>The trajectory has been updated to reflect the latest position on sites and will be included in housing evidence base / draft local plan trajectory.</p>
<p>Montagu Evans on behalf of Taylor Wimpey East London (Conquest House)</p> <p>Daniel Watney on behalf of Prime Place</p>	<p>Bromley Town Centre</p> <ul style="list-style-type: none"> Support updates to the draft Local Plan in light of revised London Plan policies (i.e. housing targets, importance of identifying sites to optimise housing, including town centres and poorer quality commercial space, pressures for primary and secondary school places, generous approach to residential parking standards may be appropriate in outer London, and designation of BTC as an Opportunity Area (OA)); Reference made to planning applications for Conquest House (2013 application dismissed at appeal and current application pending consideration) and contribution it could potentially make to BTC; BTC has been designated as an Opportunity Area with potential to deliver 2500 homes and 2000 jobs. Sites within the OA should be maximised to ensure the target is met. Bromley North Station (one of, if not the key site) should be allocated to deliver a significantly greater quantum of residential units in accordance with the LP matrix; LB Bromley has applied for Housing Zone status proposed to be assessed by the GLA in Nov 2015. If granted this will aim to accelerate housing delivery. Zones will need to deliver 750 – 2000 houses on brownfield land with Govt. supporting LA’s with access to long term investment funding to deliver infrastructure, demolition and land remediation work. If successful the Council will be required to deliver a significant number of units over the plan period. Maximising units at Bromley North would support the latter. 	<p>Noted.</p> <p>Noted – see also site specific representations.</p> <p>Housing Zone status agreed March 2016 – see also site specific representations.</p>
<p>1 individual</p> <p>Maddox Assoc on behalf of Iris Estates</p> <p>Home Builders Federation</p> <p>Bromley Labour Group</p>	<p>Review of Green Belt boundaries to accommodate residential development</p> <ul style="list-style-type: none"> Reference to paragraph 84 of the NPPF and the need for LPAs to take account of the need to promote sustainable patterns of development when reviewing boundaries; Section 4 of the Plan does not include housing in the development activities that are affected by Green Belt and open space designation changes; Assume this is because the Council is confident that it has been able to identify sufficient previously developed land; In light of OAN and Duty to Cooperate (Housing) more land could be required to 	<p>See comments above on Vision and Objectives.</p>

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<p>Robinson Escott Planning</p> <p>Woolf Bond Planning on behalf of Taylor Wimpey</p>	<p>address strategic housing needs. Therefore premature to conclude housing is not suitable for Green Belt / Open Space;</p> <ul style="list-style-type: none"> • Green Belt review would be useful for meeting OAN, possibly meeting unmet neighbouring needs and ensuring there is a flexible supply of land over the Plan period – windfall sites not adequate; • Greenfield sites can contribute for greater good of community (local open spaces, healthcare and low cost homes); • LBB’s failure to adequately demonstrate suitable housing supply represents an “exceptional circumstance” required to release land in Green Belt • Reference to paras 83 and 85 of the NPPF and need for GB boundaries to endure Plan period. 	
<p>Indigo on behalf of Lands Improvement Holdings Griggs Cross Farm</p>	<ul style="list-style-type: none"> • Evidence base does not demonstrate how current Green Belt land fulfils its functions under National Planning Policy Framework (NPPF). 	<p>The London Borough of Bromley’s (LBB) evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and throughout the Emerging Local Plan period, through allocated and windfall sites, without any further incursion into the current Green Belt boundary. Further, the Draft Allocations, Further Policies and Designations 2015 (DAFPD) document identifies instances where “exceptional circumstances” warrant changes to the current Green Belt boundary, comprising the Biggin Hill Strategic Outer London Development Centre, expansion of existing schools and creation of new schools. The LBB recognises there is a wish of some landowners to submit their sites for potential housing supply. However, the DAFPD document finds no instances where “exceptional circumstances” support amendments to the current Green Belt boundary for these purposes.</p>
<p>1 individual</p>	<ul style="list-style-type: none"> • Understand pressures to meet need for housing but choosing to take GB land you are ignoring/unaware of how important open communal natural space is essential to health and well-being of residents. New build have no space for exercise fun or sport or creation of strong, vibrant communities. 	<p>Green Belt land is currently not being proposed for residential purposes – see above comments on Vision and Objectives. Decisions on planning applications take into account proposed amenity space for prospective occupiers to ensure there is useable and sufficient space.</p>
<p>Maddox Assoc on behalf of Iris Estates</p> <p>Historic England</p>	<p>Site Assessments 2015 Housing and Mixed Use</p> <ul style="list-style-type: none"> • Focuses on designations and physical constraints. Lacks full consideration and assessment of whether a site is deliverable or developable (suitability, availability and achievability). • Does not include recommendations on how any constraints could be overcome. • Noted that two of the large proposed site allocations are already within the BTCAPP 2010. • A lot of work has gone into the identification of sites and their capacity to 	<p>Information relating to deliverability was requested during the call for sites consultation and the Site Assessments 2015 Housing and Mixed Use does include information where it was available. Further consideration has been given to the inclusion of specific sites/sources to be included in the housing trajectory for the Plan period, including broad locations. This includes the consideration of whether or not sites are deliverable or developable.</p> <p>Noted. The consideration of heritage assets will be taken</p>

Respondent	Summary of issues	Officer comments
	<p>accommodate growth. However there appears to be contradictions in consideration of heritage assets when assessing suitability/capacity which we would seek clarification;</p> <ul style="list-style-type: none"> • Welcome site allocations including relevant designated heritage asset. Encourage you to explore overlaying any relevant headline points/findings from Borough characterisation study to help inform how each site is developed in design/devt. parameters. 	<p>into account (and were a consideration within the Site Assessments 2015 document) when establishing what an appropriate density might be for a site.</p> <p>Noted.</p>
Bromley Labour Group	<ul style="list-style-type: none"> • Within site identification section there is no suggestion that landowners were pushed or even encouraged to release land. • Statement made sites are in private ownership with no indication of deliverability or phasing (is the document wishful thinking?). On what basis are sites listed in the document. Are other sites omitted because devt. has been refused? • Comments in document regarding additional network congestion –many sites are quite small so likelihood that devt would not cause significant congestion. For larger sites this should not be a reason not to develop. Role of S106 can help. • Need commitment to affordable housing on all new developments. 	<p>As part of the 2014 consultation a call for sites was carried out encouraging landowners to put sites forward that could be delivered during the Plan period. Some submissions included details relating to deliverability and/or phasing but some submissions did not include this information. In updating the trajectory consideration has been given to whether or not sites are deliverable or developable.</p> <p>Noted.</p> <p>Noted – where a site triggers the affordable housing policy threshold it would be assessed according to the Council's affordable housing policy criteria.</p>
Orpington Field Club	<ul style="list-style-type: none"> • Agree with sites not recommended for housing allocation 	Noted
Robinson Escott Planning	<ul style="list-style-type: none"> • Methodology - predetermines outcomes on sites with an existing open space designation. Applying 'policy on' approach will not result in change nor will Local Plan recognise any materially different circumstances in respect of individual sites to those that applied when the boundary / designation was originally made. Full and transparent GB and open space boundary review must be undertaken to ensure boundaries endure into the longer term. 	See comments above on Vision and Objectives.
Indigo on behalf of Lands Improvement Holdings Griggs Cross Farm	<ul style="list-style-type: none"> • Possibly as result of failings to provide adequate supply of housing, LBB has not undertaken a Strategic Environmental Assessment of the Draft Allocations, Further Policies and Designations (DAFPD) document • LBB has not undertaken detailed Sustainability Appraisal or Green Belt Review to determine whether all Green Belt land fulfils function. 	Will be published with the draft Local Plan.
1 individual	<ul style="list-style-type: none"> • Boundary review has been conducted behind closed doors without a published methodology or the prioritising of the sites put forward – Local Plan covers a long period and recognition needs to be given as to where we might need to site homes in the future. 	Methodology as part of the consultation document considered at Development Control Committee 13 th July 2015.
Home Builders Federation	<p>Other Affordable housing, sustainable design and construction</p> <ul style="list-style-type: none"> • Draft Plan is silent on the above policies. It would be sensible for the Council to consider how it will respond to these issues. 	Further detail is included on these matters in the draft Local Plan. Policies relating to design/housing design have been amended following the last consultation in 2014 that included these subject matters. The 2015 consultation document only dealt with a small number of revised policies.

Respondent	Summary of issues	Officer comments
Bromley Labour Group	<ul style="list-style-type: none"> Policy for HMOs required to cover decent quality, size and facilities. 	Noted – a draft policy dealing with residential conversions within the 2014 consultation document makes reference to HMO’s and the need for good quality accommodation. This policy has been incorporated into the draft Local Plan.
Metropolitan Police	<ul style="list-style-type: none"> Supports 2014 Draft Policies and Designations Document and specifies that when developments set out in the 2015 document takes place they follow the 2014 document in placing safety and security as an integral part of the development. 	Noted.
1 individual	<ul style="list-style-type: none"> Turpington Lane - Allotment site provides important infrastructure for holders (7% from Trinity Village). Trinity Village has increased housing density. Options and Preferred Strategy outlined need for new housing developments to “take account of infrastructure provision including green space, wildlife and recreation areas in order to promote health and well-being” – allotment site provides such infrastructure. 	Noted – see also summary for Turpington Lane allotments.
Daniel Watney on behalf of Prime Place Robinson Escott Planning	<p>London Plan Review</p> <ul style="list-style-type: none"> During the Examination into the FALP the Inspector concluded the revised annual housing targets would not deliver sufficient homes to meet OAN and therefore an immediate review would be necessary; Emphasises need to maximise development potential of the most sustainable site allocations (in light of possible increase in target through the review process). Local Plan likely to be out of date almost immediately therefore need for planning for a greater number of site allocations than are currently proposed. 	Noted – and see above comments in response to Greater London Authority on Draft Housing Supply Policy.

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Living in Bromley – Housing Supply and Affordable Housing

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
General	BPTW Partnership for Northstar 2000 (Land at Leaves Green Road)	Until call for sites exercise is completed the potential supply of developable land available through the plan period is unclear. The extent of any potential release of land including sites within the Green Belt is also uncertain. The appropriate supply of housing land and thus the extent of the Green Belt review is ultimately based on identified housing targets. Where housing need figures themselves are flawed this places further doubt of sufficient land being identified in the plan period. Proposed housing targets on which the call for sites and the review of the Green Belt are based to be fundamentally unsound. Sets out the current London Plan context for housing requirements (i.e. 34,900 units 2011/12 – 2020/21 with a target of 500 units for LBB).	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Introduction	Montagu Evans for Taylor Wimpey (Conquest House) and London Square (Hayes Court)	Local Plan process provides opportunity for the Council to consider additional sites to deliver the vision and objectives. Important the Council look to ensure existing needs are met but to also have regard to clear direction of travel in respect of future needs. As drafted the Plan does not have due regard to DFALP.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Strategic Context	West & Partners for Relta Ltd – (Dylon)	Noted that the consultation draft was prepared before the DFALP. The DFALP calls inter alia for a sea change in the delivery of housing across London to address the chronic shortage. Established under the London Plan that the relevant market area is the whole of London. This should be reflected in the Local Plan as should the requirement not just to meet but to exceed the level of provision set out in the London Plan. Strategic context should make clear the requirement to exceed the housing targets is without upper limit. Need to have regard to emerging revised requirements of the DFALP which indicate the requirement in Bromley can only realistically rise significantly beyond the present 500 units per annum giving rise to a need for vastly enhanced 5 year land supply figure.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.
Strategic Context	Montagu Evans for Taylor Wimpey (Conquest House) and London Square (Hayes Court)	Essential to have regard to emerging policy direction to avoid the need for immediate review on adoption of Plans and to ensure policies are up to date.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Strategic Context	Crest Nicholson – The Drift and Summit House West Wickham	Key theme of NPPF is to boost significantly the supply of housing to meet the objectively assessed needs of the growing population. Omission of this from the chapter raises unnecessary questions regarding the soundness of the document and whether it is positively prepared in accordance with the NPPF. Concern regarding Council proposing 470 units per annum compared to minimum target	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft housing supply policy has been updated to

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>of 500 units per annum set out in the London Plan. NPPF specifies that Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. Furthermore the NPPF requires that each local planning authority should ensure that the Plan is based on adequate up to date relevant evidence. Decision to omit reference to DFALP (641 units per annum) render the Local Plan unsound.</p> <p>Seek clarification on matters relating to Duty to Cooperate (in relation to proposed housing target) and neighbouring borough's position on proposed 470 units per annum.</p>	take national and regional guidance into account.
Vision and Objectives	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	Support the objectives for health and wellbeing, in particular the aim to coordinate action in the borough's Renewal Areas where there are strong links between deprivation and health inequalities	Support welcomed
Objectives - Health & Wellbeing bullet 2	1 individual	Regarding renewal area of Crystal Palace, Croydon Council plans to designate its part of the Triangle as a Conservation Area	Noted
Objectives - Health & Wellbeing bullet 4	1 individual	Queries the desire for 'modern' facilities? Some traditional facilities may be preferred. Modern does not always mean good or better	The objective refers to "modern services" in any new facilities.
Objective 3 Point 2	English Heritage	We welcome the second bullet referring to development, extensions and conversions complementing and respecting local character.	Noted.
Objective 3	Crest Nicholson – The Drift and Summit House West Wickham	Proposal of 470 units does not meet the Objective "ensure there is an appropriate supply of homes to meet varied needs of the local population, which responds to changes demographics, in particular as the population ages" (support Objective overall).	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.
Objectives	Montagu Evans for Taylor Wimpey (Conquest House) and London Square (Hayes Court)	Support overarching vision up to 2030 and the 9 objectives identified. Significant weight should be given to development proposals consistent with these objectives	Noted
Objective 3	Mr Robert Taylor Landholdcapital	Paragraph 47 of the NPPF requires the council to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. The London Plan Draft Further alterations published in Jan 2014 showed that the requirement for average annual housing supply monitoring targets 2015- 2025 has increased. We therefore object that the objective is not currently being met since this new evidence shows that in accordance with Paragraph 47, the full	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft housing supply policy has been updated to

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		objectively assessed need has not been addressed.	take national and regional guidance into account.
Spatial Strategy – Projected housing growth map	Gregory Gray Associates on behalf of the Garden Centre Group owners of Keston Garden Centre	Refers to housing growth within Bromley Common and Keston (300-400 units).	For clarification the map referring to housing growth within Bromley Common and Keston relates to development with planning permission / allocated / prior approval (i.e. in this case relates largely to Blue Circle development not completed at Bromley Common). Map is not being reproduced for draft Local Plan.
Spatial Strategy – Projected housing growth map	English Heritage	With regard to the map on page 26, it is not clear how this has been generated, and whether it represents a statistical extrapolation based on population by ward, or a preferred future distribution. The plan process will need to consider reasonable alternatives, through the Sustainability Appraisal. We would expect that the final preferred distribution would reflect the environmental capacity for change within different parts of the Borough, to ensure that local distinctiveness and heritage are safeguarded and enhanced. We note that housing allocations will be included in the next Local Plan consultation at submission stage. The 'Call for Sites' (p29) suggests that the Council has not yet identified key development areas; once potential sites have been identified we would welcome early engagement to discuss how the Borough's site selection process will take account of the conservation of heritage assets, and their settings.	The map related to schemes already granted planning permission / allocated/ with prior approval. Map is not being reproduced for draft Local Plan. Engagement welcomed.
Spatial Strategy – Projected housing growth map	The Beckenham Society	Page 26 (map): Compared to surrounding wards, the number of housing units for Copers Cope Ward (300-400 units) is too high. This Ward is already overflatted and a commitment to a higher than average number of new units will only exacerbate this.	The map related to schemes already granted planning permission / allocated/ with prior approval. Map not reproduced for draft Local Plan.
Spatial Strategy – Projected housing growth map	Transport for London	For example, the housing provision map on page 26 of the draft document doesn't seem to reflect the PTAL map on page 81. Keston, Bromley Common and Chislehurst wards seemed to be earmarked for more housing than Crystal Palace and Penge and Cator (both on London Overground) and Orpington (designated a major town centre) wards.	The map related to schemes already granted planning permission / allocated/ with prior approval. Map is not being reproduced for draft Local Plan.
Spatial Strategy – Projected housing growth map	Montagu Evans for Taylor Wimpey (Conquest House)	Support key focus of Strategy to focus sustainable growth of retail, office, homes and leisure and cultural activities in Bromley Town Centre. Support identifying Bromley Town to project the most housing units in the Borough.	Noted
Spatial	Mr Robert	Object to the methodology thus far used as the Spatial Strategy can only be decided	Please see Living in Bromley General

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
Strategy	Taylor Landholdcapital	<p>once an objectively assessed figure for the overall housing target numbers has been produced. The revisions to the London Plan January 2014 produce increased housing numbers and therefore the spatial strategy can only be considered once the overall level of homes required has been considered.</p> <p>Site allocations for the draft local plan can only be considered once the Draft Further alterations to the London Jan 2014 have been assessed for the Plan. These show that the requirement for average annual housing supply monitoring targets 2015- 2025 should be 641 pa and the minimum ten year target 6413.</p> <p>Furthermore the Mayor has recently stated that the outer London Boroughs such as Bromley are falling behind in delivering their housing requirements.</p>	Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Spatial Strategy	Dr Judith John Orpington Field Club	Spatial Strategy Map under Housing Growth The high level of housing provision suggested for Bromley Common & Keston (300-400 housing units) needs to take account of the Site of Metropolitan Importance: River Ravensbourne, Ravensbourne Valley Woodlands, Keston & Hayes Commons. This important wildlife area associated with the River Ravensbourne includes a SSSI in the south and forms a wildlife corridor into the town centre. There may also be opportunities to improve flood risk management along this corridor.	This could be relevant where there are associated planning conditions attached to existing permissions or through the delivery of allocated sites. As set out above the map related to sites with planning permission / allocated sites or sites with S106 agreements to be signed at the time of publishing.
Spatial Strategy	Thames Water	<p>Thames Water seeks to be consulted on the Site Allocations document.</p> <p>To enable Thames Water to make a detailed assessment of the impact of proposed housing provision they would require details of the location, type and scale of development together with the anticipated timing of development. In general terms, Thames Water's preferred approach for growth would be for a small number of large clearly defined sites to be delivered than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades.</p> <p>As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites.</p> <p>Further detailed considerations for sites set out in response.</p>	<p>Consulted on 2015 Site Assessment document and continued consultation will take place on future documents.</p> <p>Past delivery has been on a mixture of sizes of sites.</p> <p>Noted – previously developed land is prioritised within draft policies.</p>
Policy Housing Supply	5.1 Interim Sustainability Appraisal – February 2014	<p>Climate Change Mitigation</p> <p>Retrofitting the existing building stock is an issue as domestic energy use is the greatest contributor to the Borough's high carbon footprint – primarily due to the age of the dwelling stock. It is recommended that policies encourage the retrofitting of dwellings; including those in Conservation Areas and those that have heritage value providing that certain design conditions are met.</p>	Noted.

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>Community and Wellbeing The Spatial Strategy seeks to direct housing development and employment growth to accessible locations and use development to improve access in areas of deficiency. The approach to increasing housing provision should lead to flexibility to allow for extensions and subdivisions and change of use to accommodate new dwellings for market housing and also provide additional housing for older people.</p> <p>While the Plan's approach to Housing Supply (Policy 5.1) and Provision of Affordable Housing (Policy 5.4) seeks to increase housing delivery and housing affordability, it is expected to result in a significant under-delivery of housing and affordable housing in relation to the target identified for Bromley in the 'Further Alterations to the London Plan' consultation document. The Plan is identified as being likely to result in significant negative effects in terms of not meeting the London Plan's identified housing target for the Borough.</p>	<p>Noted</p> <p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.</p>
Policy Housing Supply	5.1 London Borough of Croydon	The London Plan 2011 has recently been updated with the draft Further Alterations to the London Plan, (FALP) with revised housing targets for London Boroughs. We note that the revised figure for Bromley is a minimum ten year target of 6,413 for 2015-2025, which is 641 homes per annum. Your draft plan states that at least 470 additional homes per annum will be delivered over the 15 year plan period. We expect that the GLA will be addressing this shortfall with you. Croydon do not accept that it has any capacity to accept any shortfall in Bromley's housing provision.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Policy Housing Supply	5.1 Robinson Escott Planning LLP	Policy is inconsistent with the London Plan and the NPPF. The annual figure should be increased to 525 (500 + 5%) dwellings per annum to meet London Plan requirements and NPPF guidance.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Policy Housing Supply	5.1 NHS Property Services	The document should include information about the anticipated population growth associated with the planned housing growth. The population growth assumptions will be important for infrastructure providers, including the NHS, and should inform work on a revised IDP.	Draft housing supply policy includes information about household growth and the 2014 sub-regional SHMA. Further details in relation to the IDP are set out in the draft Local Plan.
Policy Housing Supply	5.1 Gregory Gray Associates on behalf of the Garden Centre Group owners of Keston Garden Centre	As part of submission attaches comments made to the Options and Preferred Strategy Consultation in relation to 500 units per annum being a more appropriate housing supply target than 470 units per annum, Representation refers to the GLA updating 2009 SHLAA and objects to a lower figure being proposed prior to the outcomes of the SHLAA being published.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Policy Housing Supply	5.1 Indigo Planning for Co-operative Group Sports Ground - Balmoral	The housing supply number is considered low. The Council are making provision for at least 470 additional homes per annum over the fifteen year Plan period. Supporting text makes reference to the London Plan (2011) which identifies a target of 500 dwellings per annum for LBB. We advise that this policy should consider the Draft Further Alterations to the London Plan (January 2014) which includes a revised housing target for Bromley	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
	Avenue	<p>as follows: 10 year target (2015 – 2025): 6,413 and annual monitoring target (2015 – 2025): 641.</p> <p>The current target of 470 is below the current London Plan target and the Council are at risk of falling significantly short of the 2014 London Plan target if the housing supply figure within the Local Plan is not increased.</p> <p>Supporting text suggests that new sites should be identified and existing sites reviewed to enable targets to be met. Policy and text should be expanded to include mechanism to release additional housing land when 5 year supply is not met by the allocated sites which should include for publication of 5 year land supply position and introduction of sequential approach when 5 year requirement cannot be met so that deliverable and achievable sites are developed before green belt land has to be released.</p> <p>The inclusion of a sequential approach will aid meeting the housing supply target and protect less sustainable sites such as those on the urban fringe including Metropolitan open land and the Green Belt in Bromley.</p>	housing supply policy has been updated to take national and regional guidance into account.
Policy Housing Supply	5.1 Porta Planning LLP for W. Nash - Land off Chalk Pit Ave	<p>States that the Council will make provision for 470 additional homes per annum over the 15-year plan period and this will in part be facilitated by the development of housing within Renewal Areas. We object to this Policy on the basis that this level of provision is inconsistent and considerably lower than the Mayor's revised draft housing target for Bromley. This advocates 641 dwellings per annum (over the period 2015 – 2025) based on the 2013 Strategic Housing Market Assessment for London Boroughs.</p> <p>Request that Policy 5.1 be amended so that it is consistent with the DFALP and for the Borough's housing target to be increased to 641 per annum in line with the Mayors target for Bromley. Whilst the figure of 641 is still the subject of consultation and examination, the evidence on which it is based shows a higher level of need in Bromley than that currently provided for in the draft Local Plan.</p>	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.
Policy Housing Supply	5.1 Boyer Planning for Linden Homes and Network Rail (Property Development) Bromley North Station	<p>Policy sets out the Council's overall housing target of at least 470 additional homes per annum (a total of 7,050 over the 15 year plan period), which is lower than the housing target specified within both the adopted London Plan [2011] (of 500 additional homes per annum) and draft London Plan [2014] (of 641 additional homes per annum).</p> <p>In light of the national imperative to address identified need, the 2013 SHLAA has been more rigorous than previous versions in testing potential housing capacity, the results of which have informed the housing target of 641 additional homes per annum for Bromley. Therefore there is a significant body of evidence to support the proposed increase in Bromley's housing target as set out in the emerging London Plan.</p> <p>To be found sound the policy should be amended as follows: 'The Council will make provision for at least 641 additional homes per annum over the fifteen year Plan period which will be facilitated by....'</p>	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>In 2012, the National Planning Policy Framework (NPPF) was published which sought to boost significantly the supply of housing which required that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF (paragraph 47).</p> <p>The housing target set out within the draft London Plan has been informed by the GLA's 2013 Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) which has sought to meet the requirements of the NPPF. The SHMA indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2025) more homes a year. The figure of 49,000 additional homes a year provides the basis for the housing target figures in the draft London Plan, stating that in light of the projected higher need at the beginning of the Plan period, this figure should be regarded as a minimum.</p>	
Policy Housing Supply	5.1 West & Partners for Relta Ltd - Dylon	See Strategic Context above. The future provision rather than being reduced (to 470 from 500) needs to be increased to 641 units per annum.	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.
Policy Housing Supply	5.1 WYG for Limes Leisure Investments LLP - Virgin Active Health Club	<p>470 dwellings per annum does not respond to LP 2011 target for the Borough of 500 dwellings per annum nor in accordance with the NPPF in terms of providing opportunities to meet the development needs of Bromley based on objectively assessed needs. LBB targets are based on out of date information (2008 SHMA, 2009 SHLAA).</p> <p>June 2013 Five Year Housing Supply Paper identifies 5.2 years supply and much of the supply of deliverable sites have not been tested. Using DFALP figures (641 units/annum) the supply equates 4 years worth of supply – consequently Green Belt sites need to be identified. Ministerial Statement (6/9/2012) states brownfield land within the Green Belt could be put to productive housing use without prejudicing objectives of the Green Belt.</p>	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.
Policy Housing Supply	5.1 Woolf Bond Planning for Taylor Wimpey - Land off Randolph Way	<p>Sets out detailed policy requirements in relation to housing delivery and needs within the NPPF including; a Local Plan should prepare a SHMA to assess full housing needs, provide a delivery strategy that is clear in terms of where, when and how housing needs will be delivered over the full plan period, meet objectively assessed needs for market and affordable housing, boost significantly the supply of housing and ensure a deliverable five year housing land supply (+ buffer) can be maintained.</p> <p>470 additional units per annum level of growth is substantially below requirement set out in the emerging London Plan failing to boost significantly the supply of housing and meet the full objectively assessed needs for market and affordable housing. Should make provision for at least 642 dwellings per annum 2011/12 – 2020/21.</p>	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft housing supply policy has been updated to take national and regional guidance into account.
Policy Housing	5.1 Crest Nicholson – The Drift and	Object to target of 470 units per annum and refers to DFALP that confirms the expected increase from 500 units to 641 units per annum. Even based on lower 500 units per	Please see Living in Bromley General Comments 2016 in response to 2015

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
Supply	Summit House West Wickham	<p>annum LBB's latest five year housing land supply is considered fragile (only 115 dwellings above the proposed 5 year requirement) year on year delivery is not listed and there is an over reliance on some long standing stalled allocated sites.</p> <p>Five year housing land supply position based on 641 units would result in a shortfall of 656 dwellings. Therefore essential that brownfield opportunities to deliver mixed use development in highly sustainable town/district centre locations are optimised (i.e. including Summit House).</p> <p>Further work required to ensure Plan is sound (including assessment of objectively assessed needs in accordance with DFALP and liaison with neighbouring authorities and a comprehensive review of the Green Belt to identify suitable sites (such as the Drift) with the potential to contribute to meeting housing need.</p>	<p>consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft housing supply policy has been updated to take national and regional guidance into account.</p>
Policy Housing Supply 5.1	Montagu Evans for London Square (Hayes Court) and Taylor Wimpey (Conquest House)	<p>Reference is made to the proposed target of 470 units per annum. No regard is given to the DFALP – failure to have due regard to the FALP housing requirements which represent a significant increase in need can only lead to failure of the Plan in terms of meeting Objective 3. LBB Five Year Housing Land Supply Paper for 2011/12 – 2012/13 would have a shortfall of 69 units if DFALP figures were adopted. Over a ten year period this shortfall would increase to 1685 over ten years. Therefore object to current policy in the absence of any alternative SHMA.</p> <p>Support town centre renewal involving the provision of housing.</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy. The draft housing supply policy has been updated to take national and regional guidance into account.</p> <p>The draft Local Plan trajectory and updated housing supply policy makes reference to the role of town centres in providing new housing over the Plan period.</p>
Policy Housing Supply 5.1	BPTW Partnership for Northstar 2000 (Land at Leaves Green Road)	<p>Provision for 470 units per annum is not in accordance with target of 500 units in the London Plan and is unsound. This is a figure that goes against the tide of population projections and places uncertainty on the quantum of housing land that needs to be brought forward.</p> <p>DFALP increases London-wide target from 34,900 to 42,000 new homes per annum including 25,600 affordable homes. Target for LBB increases to 640 units per annum.</p> <p>No current local needs assessment on which local supply can be based. Latest five year housing supply paper would not be sufficient to accommodate suggested levels of 640 homes per annum.</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.</p>
Policy Housing Supply 5.1	Greater London Authority	<p>As stated in the GLA's response to Bromley on their local plan at the Options and Preferred Strategy stage on 15 April 2013 Policy 5.1 of Bromley's Draft Policies document on housing supply raises some concerns to the GLA in terms of general conformity with the London Plan.</p> <p>Policy 3.3D of the 2011 London Plan states that "Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, and if a target beyond 2021 is required, roll forward and seek to exceed that in Table 3.1 until it</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.</p> <p>The draft housing supply policy has been updated to take national and regional guidance into account.</p>

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>is replaced by a revised London Plan target” LBB is proposing in Policy 5.1 to make provision for at least 470 additional homes per annum over the fifteen year Plan period. The DPD target is less than the current London Plan’s annual housing provision monitoring target for Bromley and does not reflect the fact that London’s population has grown significantly faster than projected when the 2011 London Plan was published. In light of the recent population growth and as the borough is currently at the preparation stage in the review of their core strategy, the borough should give due weight to the emerging Further Alterations to the London Plan (FALP) as a growing material consideration and as the London expression of the NPPF. Bromley should also take into account the evidence base underpinning these alterations.</p> <p>The GLA published in January 2014 an updated Strategic Housing Land Availability Assessment (SHLAA) which identifies for Bromley a capacity estimate of 641 additional homes per annum over the 2015-2025 period. The GLA also published at the same time a Strategic Housing Market Assessment which indicates a significant increase in the number of new homes needed in London than was anticipated in the 2011 London Plan. As mentioned in GLA’s report of 15 April 2013, the NPPF requires that Plans meet the “full objectively assessed needs”.</p> <p>In the case of Bromley, it is not clear how the borough’s “full objectively assessed needs” has been assessed. It is noted that the borough undertook a South East London Strategic Housing Market Assessment in 2009 and that the sub-regional SHMA will currently be reviewed. However, without an up-to-date SHMA it is not possible to assess how well the DPD will address the borough’s housing needs and contribute to the identified needs of London. This remains a strategic concern and one which is underscored by the approach to reconciling need and supply which will be put in place when the draft Further Alterations to the London Plan (FALP) are finalised. The FALP put strong emphasis on targets far identified supply being minima and urges boroughs to identify additional housing capacity through high density development in specified types of location with good public transport accessibility: Opportunity Areas, medium sized town centres, surplus industrial land and other large housing sites.</p> <p>It is currently not clear how the Local Plan reflects the proposed designation of Bromley Town Centre as an Opportunity Area in Map 2.4 and Annex 1 of the FALP. Such areas represent significant capacity to accommodate new housing, commercial and other development. The policy on housing supply as it stands would not be in general conformity with the London Plan.</p>	<p>The important role of Bromley Town Centre as an Opportunity Area and Housing Zone is reflected in the draft Local Plan and trajectory.</p>
Policy 5.1 Housing Supply	Leander Holdings for Mahut Ltd (Bickley Manor Hotel)	<p>Bromley’s emerging policy (to make provision for 470 additional homes per annum based on 2009 SHLAA and 2008 SHMA) is out of date in light of publication of DFALP that cites a minimum target for Bromley of 641 units per annum. Policy 5.1 is already out of date as it is not based on an up to date need assessment (i.e. latest GLA SHLAA and SHMA 2013). Bromley’s Local Plan must be in general conformity with the London Plan to be capable of adoption – it is clearly not at present.</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.</p>

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>Bromley therefore will need to find land capable of accommodating an additional minimum annual housing figure of 171 units. Other parts of London will not be able to provide the extra units to as it were “help Bromley out”. Housing targets across London have been increased overall by one third. It is not therefore a case of whether Bromley will have to provide more housing land, it is a case of how much it will have to provide and where it will be (resulting in a significantly increased target from 470 units). In the Emerging Local Plan the site identification process needs to be urgently reviewed to be clear where the Borough’s housing needs will be met.</p>	
Policy 5.1 Housing Supply	Richard Tear (Oakley Farm)	<p>Policy 5.1 is out of date and not in conformity with the DFALP. On LDF preparation the DFALP advises that Boroughs should seek to achieve and exceed the relevant minimum housing target. Local Plan must be in conformity with the London Plan to be capable of adoption – it cannot be so at present. Bromley therefore will need to find land capable of accommodating an additional minimum annual housing figure of 171 units.</p> <p>In the DFALP 31 of the 32 boroughs have seen targets raised. While the Mayor is saying that he is passionate about protecting the Green Belt there is much speculation about whether the growth can be accommodated without releasing GB and other protected land. Questions whether or not the Mayor will be able to keep the lower figure of 42,000 units per annum in light of need for 49,000 – 62,000 per annum following EiP. Target needs to be urgently reviewed as does the site identification process where the Boroughs housing needs will be met.</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council’s approach to Green Belt or designated land.</p>
Policy 5.1 Housing Supply	Bloomfields for Adrian Pollock (Flamingo Park)	<p>A very serious objection is made to the stance adopted by the Council in simply looking to provide 470 additional dwellings per annum (dpa) over the plan period. Instead, the Council should proceed in accordance with the National Planning Policy Framework (The Framework) and objectively assess its housing requirements over the plan period. Several authorities (Tandridge and Maidstone Borough Council for example) have commissioned consultants to provide this assessment. In these circumstances there seems no reason why the London Borough of Bromley should ignore government policy.</p> <p>It is wrong for the Council to proceed on the basis of the provision set out in London Plan Policy 3.3. Setting aside the fact that the Council is not even meeting the London Plan’s housing provision, it is wholly unacceptable to ignore the fact that this Plan is out of date. Furthermore, its provisions were based on a Strategic Housing Land Availability Assessment and Strategic Housing Market Assessment that were undertaken many years ago. Indeed, these studies preceded the publication of The Framework by several years. The Further Alterations to the London Plan (FALP) have now been published for public consultation. It is therefore unacceptable for the Council to base its strategy and provisions upon those contained in an out-of-date document.</p> <p>The FALP itself has been criticised by landowners, developers and, most notably, by the Home Builders Federation, for its failure to identify capacity to meet its assessed need for 49,000 dwellings per annum. Its provision of just 42,000 dpa is well short and, in cumulative terms, will result in massive under-provision.</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council’s approach to Green Belt or designated land. The draft housing supply policy has been updated to take national and regional guidance into account.</p>

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>It is clear from Inspectors' Reports into local plans published since introduction of the Framework that they now expect local authorities to take account of the latest ONS household projections, namely the 2008-based and the 2011-based series. Authorities that have failed to do this have often had their local plans declared unsound by Inspectors and have therefore been forced to make either a fresh start, or increase their housing provisions in accordance with the latest household projections. In the meantime, those authorities have left themselves open to planning by appeal. Therefore, unless the London Borough of Bromley produces a Local Plan in accordance with national policy as set out in The Framework, then it too will suffer the same fate as numerous other local authorities.</p> <p>In these circumstances, the Council needs to set out the forecast housing requirements based on the latest household projections or commission an independent assessment of those needs. It should then consider how and where land allocations need to be made.</p> <p>Please note that the 2011-based projections indicate that the numbers of households in Bromley are forecast to increase by over 17,400 over the period 2011-2021. Proposed provision of 470 dpa is thus little over one quarter of what is likely to be required. Planned under-provision will have devastating effect on all sectors of society.</p> <p>Although the Council has acknowledged that it has a duty to co-operate with neighbouring authorities, it appears that nothing concrete has resulted from such discussions and consultations. It would therefore be interesting to know how adjacent authorities are addressing Bromley's proposed under provision. Its strategy will surely lead to increased pressures in those surrounding areas, along with demands for even more substantial land releases that would have otherwise been needed. This matter should therefore be properly explained in the subsequent version of this Plan.</p>	
Policy Housing Supply	5.1 1 individual	<p>With such a large target to meet, every effort should be made to make use of empty neglected properties and vacant sites before encroaching further on to green belt land. Absent owners should be traced or the Council have powers to compulsory purchase empty properties to provide housing stock. Developers should be given every encouragement to convert other empty suitable properties into homes.</p> <p>I strongly agree that developers should be encouraged to convert unused commercial premises and under used areas above shops. Having lived in a flat above a shop many years ago, I know that these areas often provide large living accommodation sometimes more than an average purpose built flat. There are often areas at the back of the shop which could also provide a garden or outside space.</p>	Noted – the policy seeks to encourage the re-use of vacant properties where appropriate. It is important to note that certain employment policies within the plan seek to retain business or employment uses where appropriate.
Policy Housing Supply	5.1 Landholdcapital Mr Robert Taylor	The Council maintains that 470 units per annum is a sustainable minimum housing figure. This figure is significantly below the annual monitoring target now set out in the London Plan .The Council state that an annual total net requirement figure of 34,900 units is seen as an appropriate monitoring figure for London. Previously the Borough had	Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy. The draft housing supply

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		<p>an annual housing provision figure of 500 units per annum as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. This figure is now significantly increased by DFALP. The NPPF requires that an up to date and objectively derived assessment is used in identifying the housing requirement. We believe that the figures set out in the Draft strategy should be revisited and revised upwards to not only reflect these new requirements but also to be in line with the requirements of the NPPF in terms of the supply of homes of sufficient choice and location to meet demand.</p> <p>We appreciate that the five year land supply is a forward moving target, the new target has now been announced .The Mayor of London has called in to question the current delivery of housing to accommodate demand as set out in his comments earlier this year, therefore we believe the five year land supply situation requires to be revisited as it underpins the housing element of the strategy. If this important element is not robustly tested the Council risks that the plan may be found unsound at Examination.</p>	<p>policy has been updated to take national and regional guidance into account.</p>
<p>Policy 5.1 Housing Supply</p>	<p>Affinity Sutton</p>	<p>We welcome that London Borough of Bromley is considering a wide range of options to facilitate the provision of new build and refurbished homes, which are appropriately located across the Borough. Yet the proposed target of 470 new homes p.a. falls short of the numbers needed to address the growing requirement for homes. This target minimum is lower than the targets set in the Mayor's Housing strategy (of 500 units p.a. in Bromley) and we are conscious that there is already upward pressure on the overall London Housing targets, suggesting that the shortfall will become even more critical. We are aware of high demand for housing in all areas of Bromley. Research undertaken for Affinity Sutton by the Cambridge Centre for Housing Policy (CCHPR) in 2011, showed that there is a particular need for more affordable housing in the Borough as there are 20,900 working households in Bromley who could not afford even to rent our properties if they were let at a sub-market rent of 80%. (Research carried out by Cambridge Centre for Housing and Planning Research (CCHPR) cited in Ellis, K, Bridging the affordability gap (2011) Affinity Sutton http://www.affinitysutton.com/pdf/Bridging%20the%20affordability%20gap.pdf)</p> <p>One way of addressing this would be for the Borough to set 35% of its 470 p.a. units as a specific target for affordable homes This demand for homes is compounded by the limited number of suitable sites for large scale housing development that exist in the Borough. In the light of these limited opportunities it is essential that best use is made of the two key sites at Bromley Common (already under development) and the future plans for Bromley Town Centre to ensure delivery of sufficient affordable homes. Because there are so few large opportunity sites the Borough should ensure that proposed schemes including affordable housing are not watered down by viability assessments and even consider affordable housing negotiations on schemes <10 units sites.</p> <p>We welcome consideration of reviewing, identifying and releasing appropriate low quality Green Belt sites for residential development in order to meet the current London Plan target, but are concerned that these sites are considered carefully, and proposed</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land. The draft housing supply and affordable policies have been updated to take national, regional and local guidance into account.</p>

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		<p>developments do not undermine the existing spacious green character of the Borough.</p> <p>The Borough could also consider their own disposal of land to achieve their affordable housing targets (as other councils do). We are very concerned to break up mono-tenure concentrations housing and delivering truly mixed tenure schemes as evidenced by our highly successful redevelopment of Ramsden Estate which provided a mix of tenure types on a formerly predominantly social housing estate. Similarly the redevelopment of Alkham and Horton Towers in St Mary Cray which are currently on site, and will provide private homes for sale as well as Shared Ownership properties.</p> <p>We welcome the Borough's ambition to encourage the creation of homes from redundant or vacant buildings, yet particular care is needed in the design of converted buildings into homes to ensure that the good practice standards that London Borough of Bromley's draft policies refer to do in fact result in suitable homes.</p>	
Policy Housing Supply	5.1 Limes Leisure Investments (Virgin Active Health Club)	<p>London Plan 2011 was informed by both the London-wide Strategic Housing Market Assessment (SHMA, 2009) and the London-wide Strategic Housing Land Availability Assessment (SHLAA, 2009) and makes reference to the annual requirement for housing in London which is greater than the total minimum housing provision target. Boroughs should seek to achieve and exceed the relevant minimum borough annual average target.</p> <p>The primary role of the SHLAA is to identify sites with potential for housing; consider their housing potential; and assess when they are likely to be developed. The evidence provided by the SHLAA provided boroughs with average annual housing provision monitoring targets 2011-2021. Bromley's housing provision monitoring target in the London Plan 2011 is 500 units per annum.</p> <p>Amendments to the London Plan published in January 2014 recognise the pressing need for more homes in London and to help boost significantly the supply of housing. The Plan sets out the new average annual minimum housing supply targets for each borough until 2026. These new targets are informed by the need for housing as evidenced by the GLA's 2013 Strategic Housing Market Assessment (SHMA) and London's housing land capacity as identified through its 2013 Strategic Housing Land Availability Assessment (SHLAA). The London Plan (Further Amendments 2014) confirms a revised Bromley target of 641 units per annum.</p> <p>Housing targets and supply in Bromley have been more recently set out in the "five year supply of deliverable land for housing" June 2012 and June 2013 reports respectively. These reports confirm that an annual housing target figure of 485 units applied to the Bromley from 2007/08 - 2010/11 as a result of the Borough participating in the 2005 London Housing Capacity Study. The most up to date position on housing supply is set out in the "five year supply of deliverable land for housing" report dated June 2013. This report confirms that in terms of earlier plan targets the Borough consistently exceeded the annual completion target of 485 units each year and are in excess of the cumulative</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.</p> <p>The draft housing supply policy has been updated to take national and regional guidance into account.</p>

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		<p>target by 539 units. In light of the rate of completions it is considered that an additional buffer of 5% is relevant for the Borough.</p> <p>The report contends that during the five year supply period the Borough needs to deliver approximately 2471 units (taking into account previous completions). It states that the excess of completions for 2011/12 has been spread throughout the ten year plan period. The 5% buffer would increase the five year figure from 2471 units to 2594 units. This results in an annual "target" of 519 units per annum over the five year period.</p> <p>It is unclear how previous completions has influenced the figure and whether it relates to the original London Plan requirements of 500 units per year plus buffer as set out in the 2012 version of the document. Reviewing the 2012 version of the report which appeared to use the original targets of the London Plan 2011 (500 units pa) and the requirements of the 5% of the NPPF the 5 year supply of housing is 2500 units plus 5% i.e. 2625 units and an annual target of 525. Applying revised London Plan (Further Amendments 2014) targets (641 units pa) the 5 year supply of housing is 3205 units plus 5% i.e. 3365 units and an annual target of 673. The Council has used 519 units per annum as the annual target as set out in the June 2013 report - the Council contends it has provision for 2700 deliverable units against a target of 2594 units (519 x 5) i.e. marginally above the 5 year requirement at 5.2 years.</p> <p>As we stated at preferred options stage the Housing Target of 470 units per annum is too conservative. Not only does it not respond to the London Plan July 2011 target for the Borough of 500 dwellings per annum, it is significantly off the new target set in the January 2014 Consultation Draft of 641 dwellings per annum. On this basis it is considered the housing target is not in accordance with the NPPF in terms of providing opportunities to meet the development needs of Bromley and it is not based on objectively assessed needs.</p> <p>This is highlighted by the fact that the Bromley housing target currently being promoted is based on out of date information i.e. the London-wide SHLAA (2009) Strategic Housing Market Assessment (2008). Both of these documents have now been updated in 2013 to inform the revised housing targets in the London Plan 2014. Bromley was made aware of this potential situation as part of the earlier round of consultation last year. In response to the preferred options stage the Greater London Authority (GLA) confirmed that the 2011 Census information found that the population of London was 8.17 million indicating the population is growing faster than forecast at the time of the development London Plan 2011. Consequently it is likely that the annual housing target for London of 32,210 units will increase as need increases. The GLA's view at that stage was that reducing Bromley's annual target at this point in time would not reflect the fact that London's and Bromley's overall housing need will be increasing. This has been borne out by the Local Plan (Further Amendments) which sets out a 42,000 annual housing target for London and a 641 annual target for Bromley. Bromley should take</p>	

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		<p>this into account in their emerging plan and reflect housing targets which will ensure it can meet its future needs.</p> <p>On this basis it is considered that the housing targets should be revised upwards to take account of the amended London Plan requirement of 641 units per annum, based on the latest evidence, and build in sufficient flexibility on the likely increasing in housing demand. It is important that the plan does not become outdated very early in its timeframe and so it will be essential to ensure that firstly, the plans housing targets are realistic, and secondly sufficient provision is made in terms of new allocations. This should include a thorough review of designations, including green belt, to identify land that may be suitable to contribute to the Plans housing requirements.</p> <p>It is understood that Bromley originally expressed concerns of not being able to maintain the London Plan target in the later stages of the plan and opting for a lower target of 470 homes in anticipation that the SHLAA review will reflect the availability of sites and retain the local character and context, whilst maintaining the Green Belt. These assumptions appear to be largely based on the large proportion (around 96%) of recent housing that have come forward on brownfield sites and the housing target policy focuses on intensification and renewal.</p> <p>The Council's five year housing supply paper in June 2013 contends that the Borough can identify five years' worth of deliverable housing. They consider they do not need to provide allocations for the first five years and will seek to identify a supply of specific, developable sites or broad locations for the remainder of the Plan period in the next stage of Plan preparation, when sites are allocated. These assumptions do not pay adequate regard to the requirements of the NPPF, in particular the need to 'identify specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements'.</p> <p>Much of the supply identified in the "five year supply of deliverable land for housing" June 2013 includes permissions which have not been implemented and there is no guarantee that these developments are viable and will come forward in the next 5 years. It is also clear that the 5 year supply requirements are grossly underestimated. The assumptions in the calculation rely on outdated figures i.e. 519 units per annum. Using this figure with an identified supply of 2700 units would only suggest a 5.2 years supply in any event i.e. barely above the 5 year requirement in the NPPF and much of the supply included in the list of deliverable sites has not been tested. More crucially using the latest targets in the London Plan 2014, with an annual target of 641 dwellings per annum the supply would equate to only 4 years.</p> <p>On that basis a more sustainable option is to promote the London Plan 2014 targets at the very least, which can be reviewed once the full Bromley SHLAA has been undertaken and a clearer picture can be gained of whether there is a genuine supply of</p>	

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Policy 5.1 Housing Supply	GL Hearn for Iris Estates (Warren Road)	<p>land to meet future needs without releasing Green Belt sites.</p> <p>Providing 470 homes annually for the next 15 years is inconsistent with both the National Planning Policy Framework (NPPF) and the objectives of the London Plan and is not based on a robust credible evidence base. On this basis we do not agree that Policy 5.1 Housing is the most appropriate approach to delivering the vision and objectives for homes. We support a much higher target which seeks to significantly exceed current London Plan target of 500 homes per annum for the period to 2015 and then the much higher target of 641 homes for the period 2015 to 2025 as set out in the draft Further Alterations to the London Plan (January 2014). Observations are based on our assessment of the Council's housing land requirements and prospective housing land availability as set out under the following headings.</p> <p>Current approach seeks to provide too much weight to the protection of local character and context, whilst maintaining the Green Belt. Whilst this is an important objective the NPPF's primary objective is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (para. 14). Representation sets out NPPF advice from paragraphs 47 and 48.</p> <p>London Plan (July 2011) has projected forward strategic housing growth to cover the period 2011 to 2021. For LBB both the adopted and draft London plans set an annual target of 500 dwellings per annum to 2015 and a significantly higher level of growth thereafter, 641 units, until 2025. In moving forward Bromley will need to demonstrate during the course of the next 15 years its ability to deliver through the identification of specific sites: 641 homes plus 5% per annum (673 dwellings) over the 15 years thereafter i.e. 10,095 for the period to 2031. That is a total of 6,730 homes to 2025 (10 years) plus a clear indication as to how it proposes to deliver these homes as well as an indication as to how it will deliver a further 3,365 homes by 2030. In the absence of a credible evidence base, noting that it has not produced a Strategic Housing Land Availability Assessment or Strategic Housing Market Assessment, the Council has failed to demonstrate why it is not seeking to achieve or exceed the minimum borough housing target. This approach is fundamentally flawed and in our opinion unsound.</p> <p>To meet the requirements of the NPPF, the Core Strategy should revise its housing target in line with the adopted London Plan as well as the emerging draft Replacement London Plan. Further the Council, as set out in para. 3.3 of the London Plan, should not consider the housing requirement as a ceiling to development, moreover a target that should not only be met but exceeded where development aligns itself with other planning policy objectives.</p> <p>We have carried out a high level assessment of the Council's current housing land supply position in order to show that the Council does indeed have the capacity to support the higher housing targets set out above. The London Wide SHLAA (2009) was compiled by the GLA and has identified a total capacity of 6,838 (made up of 3,708 and</p>	<p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy and the Council's approach to Green Belt or designated land.</p> <p>The draft housing supply policy has been updated to take national and regional guidance into account.</p>

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		<p>3,130 units on large sites and small sites respectively) dwellings in Bromley from 2011 to 2021.</p> <p>This as noted above is set against a requirement up to 2021 of 6,038 dwellings (2,000 to 2015 (adopted London Plan) and 4,038 to 2021 (draft Replacement London Plan) and therefore represents a surplus of 913 identified dwellings on its 10 year target. The identified sites only comprise sites with approval or which are allocated in local plans and not sites which have necessarily been assessed as "deliverable". Unfortunately the detail of these sites has not been released but LB Bromley will need to, as part of its evidence base, make publically available those sites within the SHLAA that it intends to identify as contributing to its future housing land availability unless it seeks to rely on unidentified "windfall" sites.</p> <p>Summarised below is our current understanding of Bromley's housing requirement to 2025: Target 2015 to 2025 = 6,730 units Less Five Year Supply 2015 to 2020 = 2,160 units Bromley Town Centre AAP (BAAP) = 1,510 units</p> <p>SHLAA residual capacity (unidentified sites) = 2,683 units Residual requirement (excluding unidentified sites) = 3, 060 units Residual requirement (including unidentified sites) = 377 units</p> <p>Based on the above some 40% of LBB residual requirement from 2016/17 is anticipated to come forward from sites within the BAAP. It is therefore assumed in the absence of any evidence to the contrary that the Council will be reliant on the remaining 60% of sites coming forward from as yet unidentified sites i.e. "windfall" sites to meet its 10 year target.</p> <p>The Council has provided no compelling evidence that such sites have consistently become available to demonstrate the provision of windfall sites as a reliable source of supply and therefore such high reliance on "windfall" releases is deemed a potential concern. Beyond that the Council has provided no further information on how it intends to meet its 15 year indicative target and the need to show how it will deliver a further 3,365 new homes by 2030.</p> <p>In seeking to artificially constrain the supply of housing we further submit that the Council has failed to take into account the observations of the Inspector who hosted the Public Inquiry to the now adopted Bromley 2006 Unitary Development Plan. The Inspector agreed that Bromley should correct underperformance on the then adopted London Plan (February 2004) target for Bromley of providing 11,450 new homes for the period 1997 to 2016 (570 annually) by undertaking a sequential assessment of potential housing sites in order to identify additional land to meet needs. The Inspector went onto say that given the paucity of non-Metropolitan Open Land (MOL), this could constitute the</p>	

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		<p>circumstances to justify a review of MOL/Green Belt (GB) boundaries or Urban Open Space (UOS) and allocating a number of sites within the Green Belt for housing if necessary. These recommendations were not supported by the Council at the time yet it clearly demonstrates that there are a significant number of Green Belt sites that could either be released, or considered for release for housing without undermining the stated purposes of keeping this land within the Green Belt. Assuming these sites were all to come forward this would generate within the region of 2,000 to 2,500 new dwellings over the plan period. On this basis alone there is clear evidence to demonstrate that the Council could easily accommodate an annual housing requirement that significantly exceeds the current London Plan target of 500 homes per annum as well as emerging draft Replacement London Plan target of 641 homes by the release of Green Belt sites which have already been identified as appropriate for release by a previous Local Plan Inspector.</p> <p>The Council is proposing to identify sites for development in a number of ways including through the identification of Proposal Sites (criteria i. of Policy 5.1) and we expect to see this at the Formal Pre-submission Stage of this Plan and would anticipate that Iris Estate's land is identified as a Proposal Site given that it will facilitate the delivery of housing at a highly sustainable location within the Plan period, thereby assisting in making the housing objectives of the Plan sound. The broad objectives of directing growth through criterion ii. to ix. of Policy 5.1 are supported however we are concerned that the ability of these options without identifying Green Belt land to deliver all new housing has not been substantiated by a robust and reliable evidence base to demonstrate that this is the most appropriate approach to delivering the vision and objectives of the Plan. In the selection of sites it is acknowledged that priority should be given to the redevelopment of previously developed sites in the most sustainable locations such as in town centres.</p> <p>We submit that the Council does not have sufficient sites to accommodate the level of housing growth to meet its requirement to deliver 673 homes for the period 2015 to 2025. Within this context, LBB should assess the suitability of sites for housing development through the application of a sequential approach, and should not rule out sustainable urban extensions in meeting its future housing land requirements.</p> <p>Essentially, LBB should be assessing potential housing sites against each of the following criteria; the availability of previously-developed sites and empty or under-used buildings and their suitability for housing use; the location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals); to absorb further development and the cost of adding further infrastructure; the ability to build communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate</p>	

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		<p>local services and facilities; and the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account that such risk may increase as a result of climate change.</p> <p>Furthermore it is submitted that town centre locations and smaller previously developed land parcels do not always have the capacity to deliver the appropriate mix of housing to meet local needs. For example town centre developments are typically geared to higher density developments of flats which do not meet the needs of families. The policies and proposals of the Development Plan Document must be based on a thorough understanding of the needs of their area and the opportunities and constraints which the Council needs to take into account. The Council's housing proposals fail to do this and accordingly Policy 5.1 Housing is unsound.</p>	
Policy Housing Supply	5.1 GL Hearn for Muse Development Ltd	Confirm our support for Policy 5.1 (housing supply) which details that the Council's housing targets will be facilitated in part by town centre renewal with the provision of housing. Such an approach will ensure that housing development will come forward within sustainable town centre locations.	Noted.
Policy Housing Supply	5.1 The Beckenham Society	<p>Page 32 Add to item iv. - windfall and especially brownfield sites.</p> <p>Page 33 map: The table shows a plan to over deliver housing units in the first two periods (compared to the London Plan requirement) and under deliver in the final period of the three periods (2018/19 – 2020/21). This may lead to unwelcome planning decisions either at local level or the Planning Inspectorate if the target for the third period is not met. Can the flow of housing delivery be smoothed to meet the target in all three periods to avoid this?</p>	<p>Prioritising the development of brownfield sites is set out in the draft housing supply policy.</p> <p>The updated trajectory illustrates the anticipated delivery timescales for housing sites. Reference is made to monitoring of housing delivery within the supporting text of the housing supply policy.</p>
Policy Housing Supply	5.1 Copers Cope Residents Association	Commitment to using brownfield/derelict sites in the borough for housing before considering development on green sites and/or the knocking down of large houses to build high density housing.	<p>Prioritising the development of brownfield sites is set out in the draft housing supply policy.</p> <p>It would not be appropriate to totally restrict the redevelopment of existing units as each planning application is considered on its own merits. Other policies drafted include detailed criteria (i.e. Housing Design and policies within Bromley's Valued Environments) against which proposals can be assessed and which aim to ensure that good quality designs and living environments are achieved / or restrict development in appropriate areas or sites.</p>
Policy	5.1	1 individual	Pg32 - 'the London Plan Policy 3.3 ...' – In view of the 15-year life of the Bromley Local
			The glossary will make reference to the

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Housing Supply		<p>Plan, and probable revision of the London Plan over this period, it might be wise to identify referenced documents by date or year in the LBB Local Plan.</p> <p>Also delete the superfluous 'the figure of' e.g. 'The figure of 34,900 units is seen as ... etc'. Is 'an annual housing provision of 500 units' really an annual new housing 'target' or 'requirement'?</p> <p>Pg33 - Who or what is a 'South-East London sub region' which commissioned a housing assessment?</p>	<p>applicable London Plan.</p> <p>Please see Living in Bromley General Comments 2016 in response to 2015 consultation which address updated housing supply policy.</p> <p>South-East London sub region is made up of five boroughs (LB Bexley, LB Bromley, LB Greenwich, LB Lewisham and LB Southwark).</p>
Policy 5.4 Provision of affordable housing	The Beckenham Society	<p>Suggest add to final paragraph (before heading of Payments in Lieu): "In the interests of creating mixed and balanced communities, provision higher than 35% of total housing units will not be permitted unless it can be demonstrated that market housing would be unviable."</p>	<p>It is considered that the proposed addition would prevent opportunities for a higher percentage of affordable housing on site that are important in meeting the housing needs of the Borough. In some instances 100% affordable housing on smaller sites is provided for practical reasons (i.e. sub division of one building into separate tenures can be impractical), suggested clause would prevent these sites from being delivered.</p>
Policy 5.4 Provision of affordable housing	JTS Partnership LLP for The Roman Catholic Diocese of Southwark	<p>The policy rightly sets out possible exceptions where a lower level of affordable housing can be sought and makes reference, in the supporting text, to the consideration of the accessibility of sites, particular development costs, the need to achieve successful housing development and where the provision of affordable housing would prejudice the realisation of other planning objectives.</p> <p>However, these stated considerations do not cover all possible situations where a lower provision may be sought and justified. It should be acknowledged that other circumstances may exist where other key planning objectives can be realised and a relaxation of provision is justified.</p> <p>Recommended that the supporting text is amended at the final paragraph on page 40 to read: "In negotiating the level of affordable housing the Council will seek the provision of 35% of habitable rooms on a site unless material considerations indicated otherwise. In negotiations the principle considerations will be, ALTHOUGH NOT LIMITED TO:"</p>	<p>The aim of the supporting is not meant to limit considerations to those listed but to just highlight them as principal considerations.</p>
Policy 5.4 Provision of affordable	Greater London Authority	<p>The NPPF, London Plan Policies 3.11 and 3.12 and the Mayor's Housing SPG emphasise that the priority for affordable housing is maximising supply. It is felt that the wording of Bromley's Policy 5.4 on Provision of affordable housing in paragraph 2 does</p>	<p>An Affordable Housing Viability Assessment (2012) supports the policy as drafted that seeks 35% affordable housing on sites</p>

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
housing		not seek to maximise affordable housing. It is therefore suggested that the policy is redrafted to ensure that affordable housing provision is maximised. The London Plan Policy 3.13 also encourages Boroughs to seek a lower threshold through the LDF process where this can be justified in accordance with guidance. It is not clear whether Bromley have considered the contribution setting a lower threshold than 10 dwellings could have in meeting the need for affordable housing. Please also note that the definition of intermediate housing has changed in FALP.	capable of providing 11 or more units unless it can be demonstrated through a financial viability appraisal that this is not possible. The updated policy takes into account more recent national guidance.
Policy 5.4 Provision of affordable housing	GL Hearn for Muse Developments Ltd	In relation to draft Policy 5.4 (affordable housing) we consider that the supporting policy text should be revised to include wider regeneration benefits as a material policy consideration, in addition to viability, as instances that would justify non-compliance with affordable housing targets. Such an approach would ensure that where justified, the policy would not stifle development proposals bringing forward wider regeneration benefits.	Considered suggestion would negatively impact on overall number of affordable homes delivered over the plan period which is resisted. All schemes are considered in the same way and if delivery of affordable homes is not feasible there is flexibility within the policy, through the submission and consideration of a FVA to investigate this.
Policy 5.4 Provision of affordable housing	Savills for Methodist Homes	(MHA) who are one of the largest charities providing care, accommodation and support services for more than 16,000 older people throughout Britain. MHA owns and operates a wide range of traditional care homes, retirement apartments, assisted living and extra care housing developments across London. Cross reference should be made in paragraph 5.4 that distinct arrangements will apply to specialist accommodation for older persons accommodation. Would then be consistent with supporting text to policy 5.11.	Ensure policy is cross referenced appropriately with Policy 5.11.
Policy 5.4 Provision of affordable housing	1 individual	Can any provision be made in policies to provide percentage of affordable housing in developments only for first time buyers wanting a home for themselves, and to get on the housing ladder, not affordable just for those wishing only to purchase for investment purposes?	The allocation / purchase of affordable units of different tenures is subject to clear guideline national and regional guidelines. The draft affordable housing policy has been updated to take into account national and regional guidance. Intermediate housing could be relevant to the representation made which is detailed within the updated policy and secured through a legal agreement.
Policy 5.4 Provision of affordable housing	Affinity Sutton	Welcome that LBB has set a target of 35% provision of affordable dwellings on sites above 10 units, and support them setting a ratio between intermediate ownership and affordable/social rented properties that follows the 40/60 split in the London Strategy. The further commitment in the Mayors Strategy to divide the 60% portion equally between affordable and a lower social rent, provides positive targets addressing the spectrum of rental levels required. Through experience we believe that some flexibility is required on the tenure make up of individual schemes, to successfully deliver attractive suitable in some locations, for example not mixing tenure type within small blocks to improve our ability to market, set service charges and manage the properties. This balanced and flexible approach will encourage an increase in low cost home ownership and rental to provide homes that Bromley residents can afford, and want to live in. Recent research we've undertaken shows that the affordable rent product at rents set at	Note the need for flexibility on the tenure make up of individual schemes. It is considered that the policy does allow for flexibility. Note also that research undertaken shows affordable rents set at 80% market rents do not support needs of those on low incomes without recourse to Housing Benefit. In relation to affordable rent the supporting text as updated makes reference to 80% market rents where this does not exceed Local Housing Allowance levels unless by

Objective/ Policy / issue	Respondent	Summary of issues	Officer comment
		<p>80% of market levels does not meet the needs of those on low incomes in the borough without recourse to Housing Benefit and we would support the re-introduction of a proportion of lower rents. Ensuring affordability is a complex process, particularly during the current period of welfare reform. We would be interested in commenting further or providing evidence for any future SPD guidance that London Borough of Bromley provided in this area. (Research carried out by Cambridge Centre for Housing and Planning Research (CCHPR) on behalf of Affinity Sutton (Forthcoming 2014))</p> <p>It is helpful to have clarity on London Borough of Bromley's definition of Social Rented, Intermediate housing and Affordable rented products. Affinity Sutton's Affordable Rent Policy for 2011-2015 is currently in line with this definition as rents are set at 80% or LHA (whichever is lower) for 1 and 2 bedroom properties and 65% or LHA (again, whichever is lower) for 3 and 4 bedroom homes (This approach may change for new AHP term.).</p> <p>For sizable new developments, using the Affordable Social Housing element to kickstart and establish new communities is a sensible way to bring forward funding and support community cohesion. However it is essential that reasonable levels of infrastructure are in place before occupation (including but not limited to, public transport or usable open space, educational provisions, local facilities and services). And the phasing of these community assets should be carefully considered as part of the S106 negotiations. In addition to the transfer of ownership of newly constructed housing consideration is needed to the allocation of homes to ensure suitable future occupancy. Through nominations to us from our partner local authorities such as Bromley, we will continue to support households who the local authority has given priority to, under its allocation scheme. A key part of our approach to creating mixed, balanced communities is to develop a tailored Local Lettings Plan (LLP) for each new build scheme ahead of its completion. One element of LLPs for new schemes is to achieve a minimum of 25% of first lettings going to low income working households.</p> <p>We want to work with local authorities to explore how they can use the new provisions in the Localism Act 2012 to support more working households to access affordable housing, whilst still giving priority to those legally entitled to "reasonable preference". We would like to agree at a local level a target percentage for the number of nominees who meet these criteria. We will also work locally to house tenants of other landlords who need to move, including to release much-needed homes, where this fits the stock we have available. Controlling who moves into our homes is crucial to how we create cohesive communities. We are a charitable organisation, committed to meeting housing needs and supporting vulnerable people but we believe we support people best in mixed, vibrant communities where tenants can afford rents and sustain their tenancies we do not want tenants to lose their homes because they cannot afford the rent. Use housing allocations proactively to promote more economically active communities, meet range of needs, in particular to support people in low paid employment.</p>	<p>exception. Welcome future collaboration.</p> <p>Noted – the draft Local Plan sets out the importance of / need for infrastructure requirements.</p> <p>Highlighted as an issue to discuss with Housing colleagues for future collaboration.</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Living in Bromley – Sites assessed and proposed for residential allocation

Site: Civic Centre site, Stockwell Close, Bromley

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Allocate for mixed use development including residential (potential 20 units), office, community facilities, parking and education

26 responses were received –3 letters, 8 emails, 15 online comments.

Respondent	Summary of issues	Officer comment
4 individuals; Adrian Lawrence, Lanniston Developments	<u>Principle of development</u> <ul style="list-style-type: none"> • The Civic Centre site should not be sold for housing • The Council should invest in employment opportunities on the site • Easy face-to-face access to Council services should be retained on site • There is no indication of where the Council offices would relocate 	The site allocation includes the provision of a Civic Centre hub consolidating the Council's offices and democratic functions on the site, and housing on part of the site. This reflects the Council's decision in May 2016 to consolidate its functions on part of the site and dispose of part of the site for housing, together with the provision of a park.
5 individuals	<u>Amount of development</u> <ul style="list-style-type: none"> • Will cause fundamental change to character of the area • Covenant does not allow change in character of the area • "Mixed use" is very general, further detail needed • There should be no high rise development • Development could affect local views • For the visitor, spacing out of Council functions is preferable to cramming them into a smaller space • Suspicions that the amount of residential will be more than 20 units • Any buildings should be no nearer to residential properties and should be limited to the height of the current buildings 	<p>Concerns noted. The heritage and environmental value of the site is recognised , in particular listed buildings and structures, the SINC and open space and any development will be required to respect and enhance these where possible.</p> <p>The layout, design, and positioning of residential units will form part of the planning application at which stage a full assessment of impacts on the neighbouring properties will form part of the process.</p>
4 individuals; Greenpeace	<u>Access and traffic concerns</u> <ul style="list-style-type: none"> • Access from Rafford Way would be detrimental to neighbouring properties • Access during construction will cause noise and disturbance • No guarantee that new users of the site will not cause disturbance to neighbouring residents • Concerns over impacts on the local road network • Supports if suitable access, parking and traffic flow impacts could be managed 	<p>Access and highways matters will be considered in detail as part of the planning application process.</p> <p>The use of conditions can restrict the hours of construction and potential disturbance.</p>
9 individuals; Orpington Field Club, London Wildlife Trust, CPRE London, Greenpeace	<u>Natural environment</u> <ul style="list-style-type: none"> • Objections to any development in green space and SINC Boundaries should be drawn to avoid adverse impacts • Trees on the site should be preserved especially along the boundaries • Green areas allow for public enjoyment and health benefits – a residential block would take away public access • There is a badger set on the Civic Centre site 	<p>The proposed site allocation includes part of the site forming a public park, and any scheme will be required to minimise adverse impacts to the SINC and character of the area, and retain trees where possible.</p> <p>There is a foxes lair on the Civic Site but no known badger set.</p>
2 individuals	<u>Alternative uses</u>	The site is no longer required within the Local Plan as a

	It is a suitable site for a primary school, health centre, a better swimming pool, improved library and community centre	potential school site. The library in the town centre is unaffected. The proposed allocation includes the retention of the Civic Centre functions including existing democratic and community uses.
4 individuals	<p><u>Built heritage</u></p> <ul style="list-style-type: none"> • Development could affect the statutorily listed Old Palace • The Old Palace is not shown as protected on the map • What uses will the Old Palace be put to? • An objective assessment of the setting of the listed building and other heritage assets is required before development can be specified 	The Old Palace is a Grade 2 listed building and any development will required to respect and enhance where possible the building and its setting.
2 individuals	<p><u>Benefits of development</u></p> <ul style="list-style-type: none"> • The high price of land would mean benefits from developing for housing • Support for the site allocation 	Support noted.
Daniel Watney for The Fairworth Gospel Hall Trust	<p>Site contains multiple operational employment and public administrative uses.</p> <p>Much of site contains environmental, geological and heritage constraints to development and also contains two areas with potential contamination. Sensitive lower density residential interfaces could present an additional challenge to timely delivery over the plan period.</p> <p>Significantly reduced development, coupled with proposal for primary school and retail uses, places doubt on achievability of 20 dwellings.</p>	<p>Site constraints recognised, and importance of heritage and environmental assets as outlined above.</p> <p>Education use is no longer proposed for this site.</p>
Thames Water	Based on information currently available, does not envisage infrastructure problems with water supply capacity or wastewater infrastructure on this site. Further details are required to understand the extent of demolition and connection points.	Comments noted.
Montagu Evans for London Borough of Bromley	<p><u>Any redevelopment would need to take account of the many site constraints including:</u></p> <ul style="list-style-type: none"> • Character and setting of the Old Palace and other listed structures • The lake • The proximity of residential properties • The current Urban Open Space and SINC designations • Existing trees <p><u>Particular issues being investigated:</u></p> <ul style="list-style-type: none"> • Quantum of development including density • Maximum building heights • Preservation and enhancement of the character and setting of the listed building • Access arrangements • Redesignation of Urban Open Space • Need for a design code to ensure quality development 	The site constraints are reflected in the proposed site allocation.

Site: Bromley North Station, Tweedy Road

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Allocate for mixed uses including residential (potential 250 units), office, retail and transport interchange

20 responses were received – letters, emails, responses online.

Respondent	Summary of issues	Officer comments
Daniel Watney for Prime Place	<p>Request that the wording of the allocation be amended to</p> <p><i>“residential (density of between 215-405 units per hectare), ancillary retail and community uses together with transport interchange”</i></p> <p>A density of 215-405 units per hectare (equating to 581-1094 units in total) in accordance with the adopted London Plan density guidelines, would be more appropriate in this central location.</p> <p>The reasons why this density is considered acceptable are;</p> <ul style="list-style-type: none">• Bromley is within an opportunity area – proposals should optimise densities• Brownfield town centre site with high ptal• Bromley Council have applied for Housing Zone Status• The GLAs comments on a previous scheme for 500 units indicate that a residential led mixed use development along the lines proposed by the applicant would be acceptable from a strategic planning perspective• LBB have consistently failed to meet their revised target of 641 units in 5 of the last 10 years• LBB has a historic cumulative housing delivery deficit of approximately 1,063 units from 1996 to date• During the EiP for the Further Alterations to the London Plan (FALP) the Inspector concluded that the revised housing target would not deliver sufficient homes to meet objectively assessed need• A higher quantum of units would be required to make the scheme viable• Viability evidence and analysis which was accepted by the court demonstrated that 250 units would never be viable whatever the market conditions• There is already a quantum of employment floorspace on the site which has been upgraded and refurbished, 27.2% currently remains vacant despite active marketing. The evidence suggests that there would not be a significant demand for employment floorspace on this site with 78,806sq ft vacant within a 1 mile radius of the site. <p>The Council have not identified any adverse impacts upon key views within the town centre or on the setting of the station building, arising from the provision of a tall building towards the rear of the station building. This indicates that a second or enlarged location suitable for tall buildings could be identified within the site allocation along the boundary with the railway track without having any impact upon the setting of the station, key views within the town centre or the immediate context of the site.</p>	<p>The site has been reviewed with work undertaken by consultants, which identifies that a higher density scheme than in the 2015 consultation can be accommodated together with offices, and is included in a revised site allocation.</p>

<p>Transport for London</p>	<p>Supports the site allocation in principle.</p> <p>TFL notes the site forms part of the Council's Housing Zone which proposes a development of 400 units, and therefore further clarification is required on the overall number of units.</p> <p>Any site allocation must provide a replacement bus standing facility with welfare facilities in accordance with TFL's criteria (see criteria listed in representation)</p> <p>TFL would consider a land swap to locate the bus stand area with the site immediately adjacent to the railway.</p>	<p>Support noted and requirement for replacement of bus standing facilities and welfare facilities.</p>
<p>Boyer Planning (on behalf of NHS Property Services (NHSPS))</p>	<p>The existing clinic on the site was vacated by Bromley Healthcare in November 2014 and the services have been relocated to other local clinics. The site is no longer required for operational use and is declared surplus to NHS requirements. It is intended to be disposed of on the open market. As a result, the original reasons for allocating the clinic are no longer relevant, with the existing facilities no longer fit for purpose. The clinic site should be removed from the allocation site in order to assist with the sale of the property. This would accord with government policies to release surplus public sector brownfield land for new housing development. This would also provide the NHS with a capital receipt and revenue savings which could be spent on improved health provision.</p> <p>There is no evidence that the wider site or the Bromley North Clinic itself is required to provide health or community facilities. The provision of community facilities within the wider Bromley Town Centre Area but due to the constraints of the Bromley North Clinic site, it is not regarded as an appropriate location for this use.</p>	<p>The clinic is considered an integral part of the site, and is therefore included in the site allocation.</p>
<p>Network Rail</p>	<p>The stated number of units is too low and doesn't comply with London Plan density guidelines. The proposed wording should be amended to;</p> <p>"allocate for a residentially led development at a density of 214-405 units per hectare (approx. 600-800 units) with ancillary transport interchange, office and retail"</p> <p>Network rail is an active member of the London Land Commission and is working with the GLA and London Boroughs in order to identify sites that can help deliver housing figures, with focus given to designated housing zones. It is highly likely that the site at Bromley North will form one of these sites, and therefore it is vital that the development potential of the site is properly realised.</p> <p>The DCLG and Department for Transport have specifically tasked Network rail with reviewing all land and assets across the entire network to determine how many residential units can be delivered. Emphasis has been made on maximising residential provision on development sites as well as identifying any new opportunities. Network Rail would welcome discussions with the Council either through Land Commission or separately in order to investigate how all land holdings could be best used to create quality comprehensive development of the station.</p> <p>It should be acknowledged in the wording that areas of the site are suitable for tall buildings.</p>	<p>Comments noted. As above the review of the site has increased the potential capacity of the site.</p>

	<p>It is considered that a second or enlarged location can be provided within the site along the boundary with the railway track that would be suitable for tall buildings.</p> <p>The development potential of all sites should be maximised (Bromley Town Centre is designated as an Opportunity Area)</p> <p>As part of any development of the site it will be necessary to ensure the continued safe operation of Bromley North Station and Network Rails Infrastructure... Station facilities including car parking will also need to form part of the development consideration and therefore a greater quantum of development is required in order to fund the cost of these works.</p>	
1 individual	<p>250 units seems rather large</p> <p>Should be accompanied by a better statement of how transport will be improved in the area for example ;</p> <ul style="list-style-type: none"> • Should seek an increase provision for parking spaces • Better understanding of how TFL will develop the area • We will not be able to accommodate this level of housing unless we improve our transport 	The Council's review of the site has informed the revised site allocation, and protects the transport interchange.
Adrian Lawrence, Lanniston Developments	<p>The site should be reserved for a major transport interchange only</p> <p>The loss of parking spaces for the station would be greatly detrimental if Bromley North provided the type of railway services previously mentioned (DLR/London Underground)</p>	The Council's review of the site has identified that the existing transport interchange and any improvements can accommodate capacity as set out in the site allocation.
1 individual	<p>Using Bromley North as a terminus for an extension to the DLR would make more financial and transportation sense.</p> <p>250 units is too many</p> <p>Homes should be in keeping with the area</p> <p>There is a need for owner occupied homes and the site is not appropriate for such housing</p> <p>A block of flats would negatively impact on the aesthetic look of the village, impact on outlook and the building would cause disruption.</p>	The Council's policies in the Getting Around chapter promote the extension of the DLR and this would not be precluded by the site allocation. Concerns noted.
1 individual	<p>250 units for the site is excessive</p> <p>If high rise residential is envisaged this would dwarf neighbouring areas of conventional housing.</p> <p>250 units would require 250-500 parking spaces – an overload on the area.</p>	<p>The draft Local Plan needs to take into account current and future needs and be in conformity with national and regional planning policy. This includes providing for housing need whilst also respecting and taking into account other policy areas.</p> <p>The layout, design, and positioning of residential units will form part of the planning application at which stage a full assessment of impacts on the neighbouring properties will form part of the process.</p> <p>The Council has undertaken work to review the capacity of the site, and this has informed the revised site allocation.</p>

1 individual	Consideration will need to be given to the increased number of cars, parking, traffic flows.	A transport assessment will be required as part of any planning application.
Ms Roisin Robertson (Area Networker, Greenpeace SE London Greenpeace Bromley)	Should be in keeping with and enhancing the characteristic Victorian and Arts and Crafts style architecture of the surrounding area. Should include affordable housing Must be in line with ecological energy provision and ecological development goals.	The draft Local Plan needs to take into account current and future needs and be in conformity with national and regional planning policy. This includes providing for housing need whilst also respecting and taking into account other policy areas. The layout, design, and positioning of residential units will form part of the planning application at which stage a full assessment of impacts on the neighbouring properties will form part of the process. Any scheme will be required to meet the energy requirements set out in the London Plan and the Local Plan.
1 individual	Has sufficient attention been given to the designated heritage assets?	Bromley North station is a Grade 2 listed building and any scheme will be required to respect, and where possible enhance the setting of the building
1 individual	Does not support if this involves closing the station. There should be more trains to central London.	There is no proposal to close the station. The Council's transport policies seek improvements to the services from Bromley North to central and east London.
2 individuals	Concerns re the listed building at Bromley North being within the boundary. Maybe site boundaries need re-allocating.	As above, the listed station building is valued, and any development will be required to respect, and where possible enhance its setting.
1 individual	Some modelling and testing of what this site can reasonably accommodate in terms of the amount of development is important. To insert a figure of approximately 250 homes in advance of this modelling is inappropriate as it is making assumptions that have not been properly tested as to the density the site can support, particularly when other uses are proposed as well. Such modelling should take into account the modest size of residential properties that closely abut the site particularly to the northern and western sides of the site as well as the need to preserve the setting of the listed building and views of the station from the conservation area. Appropriate access to the site and land required for infrastructure should also inform any capacity figures.	The Council has undertaken work to review the capacity of the site, and this has informed the revised site allocation.

Site: Bromley Valley Gymnastics Centre, St Mary Cray

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Allocate for mixed use development including residential (potential 200 units), upgraded gymnastics centre and library, community uses, parking

21 responses were received – 10 letters/emails, 11 responses online.

Respondent	Summary of issues	Officer comments
Daniel Watney for Prime Place	Site has interface with lower density residential areas. Query achievability of proposed new community facilities in addition to 200 new dwellings, without requiring substantial increase in density and losing open and green character towards the rear of site	Further assessment of potential impacts of new mixed use development on surrounding land uses would be undertaken at planning application stage.
Thames Water	On the information available to date, Thames Water do not envisage infrastructure concerns regarding water supply capability in relation to this site. The wastewater infrastructure is operating very close to capacity, consequently it is likely that the developer will be required to fund an impact study in order to determine the magnitude of space capacity in the system and a suitable connection point. As set out in Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended	Noted
Sports England	Objects to the allocation of land unless Planning Policy Objective 1 within Sport Englands Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' is met – this aims to prevent the loss of sports facilities and land along with access to natural resources used for sport.	Comments noted, the site allocation includes the re-provision of the sports facilities
CRA20ten Residents Association St Pauls Cray	Welcome an upgraded Library and community facility, but would have expected further community facilities to have been identified such as a replacement childrens centre, and opportunity for a new medical centre. A considerable number of parking spaces would be lost - parking spaces are at a premium already The implications on parking, school places, and medical requirements would be enormous. Would expect most of the mature trees/bushes to be retained. The number of units should be determined at Development Control Level. The covenant should be investigated. The heritage section is wrong – the excavation of a medieval site at Walsingham School in 1995 revealed the remains of a Medieval farmsted noted in a report by a Mr John Saunders following a desk bound assessment by Thames Valley Architectural Services.	Welcome noted. Site Allocation will include provision of parking. When a planning application is submitted the appropriate contribution to education and housing provision in line with the current SPD Planning Obligations will be required, and the layout, design, number of units will be subject to detailed assessment as part of the planning process when a planning application is submitted. Due process will take place in respect to the covenant. The site allocation will require re-provide of a linear park/open space. Noted, and heritage section to be amended.
3 individuals	The proposed site allocation contradicts all of the aims of the draft allocations further policies and designations document e.g it states that any growth “will need to be supported by additional, physical, social and green infrastructure”the plans objectives is to “manage, protect and enhance natural environments.....encourage the protection and enhancement of biodiversity” and “improve the quality of open space and encourage it in any new	

	development”	
7 individuals	Traffic implications: This part of the borough already gets gridlocked Increase in volume of traffic	A detailed transport assessment will be required to accompany a planning application.
9 individuals	Parking implications: Loss of heavily used car park is a concern Chipperfield road cannot accommodate extra parking Where will people park for the shops	Concern noted. Provision of public parking will be required as part of any scheme.
7 individuals	Infrastructure impacts: Pressure on transport, schools, health, and other resources	Comments as above, transport assessment will be required as part of the planning application process and contributions to health and education in line with the Council's SDP 'Planning Obligations'
7 individuals	Open space Loss of open space is a concern The green space would face destruction. The proposals would adversely affect the natural environment	The site allocation includes the provision of open space
1 individual	It is not clear what will be happening to the existing library and Gymnasium. What sort of housing is proposed? Trust that detailed plans will be made public.	Re-provision of the library and the Gymnasium would be required as part of any scheme.
1 individual	The redevelopment should provide an alternative site for Bromley Valley Gymnastics throughout the period of redevelopment.	It is anticipated that any development would be phased and would allow for the new gymnastics centre to be completed prior to the closure of the existing one.
Adrian Lawrence, Lanniston Developments	This is not what is required for families. There are much better sites that could accommodate the type of homes we should be building.	
Orpington Field Club	Care should be taken to maintain and enhance the biodiversity along the linear park following guidance in the Bromley Biodiversity Action Plan.	Noted
1 individual	Green spaces are important for a healthy environment. Changing this traditionally green space into a housing area would put pressure on the clean and green environment of Bromley Borough. The site should include a mix of housing and in accordance with ecological energy standards. The development of the site would put pressure on transport, schools, health and other resources	Concern noted and reprovision of open space would be required as part of any scheme. Comments as above.
2 individuals	Agree with the site allocation	Support noted.

Site: Bassett Campus, Broadwater Gardens, Orpington

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Allocate for residential (potential 100 units)

14 responses were received – 5 letters, 2 emails, 7 responses online.

Respondent	Summary of issues	Officer comment
Daniel Watney for Prime Place	Prior approval recently granted for conversion of Bassetts House into 12 residential units. Addition of approx. 90 additional dwellings would result in overdevelopment of a sensitive site. Potential development of 3 storey buildings around locally listed Bassetts House and further units in close proximity to ecologically sensitive pond could have detrimental impact on character of area	Further assessment of potential impacts of new residential development on the local heritage significance of Bassetts House would be undertaken at planning application stage, upon lodgement of any future residential proposal for the site. Requirements for further analysis of environmental and biodiversity matters would also be issued at planning application stage, once details of a potential residential building footprint become available. Does not preclude the proposed site allocation progressing to the next stage of the Emerging Local Plan process.
Montagu Evans (on behalf of London Square)	Welcome the inclusion of Bassets campus as an allocation but do not agree with the density of approximately 100 units as it does not identify the full potential of Bassetts Campus to deliver housing. The allocation should identify the whole sites capacity as approximately 115-120 units.	The site allocation does not preclude an application coming forward for a higher number of units. The number of units on the site will be assessed as part of a detailed planning application having regard to the impact of the development (e.g. on the existing character, residential amenity, traffic implications, infrastructure etc)
6 individuals; London Wildlife Trust Dr Judith John (Orpington Field Club) CPRE London	Concerns regarding the impact on the SINC. Many of the responses state that the SINC should be excluded from the designation.	It is not intended that the area of the SINC and the pond be developed. The SINC falls within the boundary of the whole of the site which is within the same ownership. The detailed site allocation will make it clear which parts of the site are developable. The developable area of the site will not include the SINC and pond area.
1 individual	Traffic implications Concerns regarding parking Possibly need to consider road humps to slow cars down	Detailed traffic and parking implications will be assessed as part of any planning application (applies to all recommended sites).
Adrian Lawrence	The site was already subject to a planning application for 100 units but determination was delayed by the planners for some reason. This could perhaps be seen as an attempt to add another 100 units from the previous plan period to the current plan.	The previous application for 99 residential units was withdrawn when the site was sold to a new owner. A new application has been submitted by the new site owner (London Square) and is currently under consideration.
Thames Water	On the information available to date, Thames Water do not envisage infrastructure concerns regarding water supply capability in relation to this site. On the information available to date, Thames Water do not envisage infrastructure concerns regarding waste water infrastructure capability relation to this site. Further details are required to understand the extent of demolition and connection.	Noted.
1 individual	100 units is too many units for this site.	The planning application will assess density and amount of development and its impact on the SINC, TPO's and residential amenity of neighbouring properties and will minimise/mitigate as appropriate.

Site: Gas Holder, Homesdale Road, Bickley

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Allocate for residential-led mixed use development (potential 60 units)

19 responses were received –6 letters, 2 emails, 13 responses online.

Respondent	Summary of issues	Officer comment
Travis Perkins	<p>The Council’s intention for a mixed use development on the site is welcomed but the policies need to go one step further to ensure that it is a mix of employment generating uses that will occupy the site alongside the much needed residential. Travis Perkins therefore does not agree with the proposed allocation in its current form and request s that a minor amendment to ensure that employment generating commercial uses will be considered acceptable so that Travis Perkins can have certainty that their businesses can occupy the site. There is no policy to definitively allow the site to be occupied by some of the businesses within the ‘Group’ . Travis Perkins builders’ merchants trades under a sui generis consent and Wickes trades under a mixed use Class A1/B8 consent whilst a number of other businesses in the TP Group trade under a Class B8 consent with trade counter.</p>	<p>The site is identified for a residential led mixed use development and therefore does not currently preclude a mix of uses on the site. The Council would expect employment generating uses to form part of the mixed use development. Further work will need to be carried out to identify the type and location of the mixed uses on the site.</p>
Quod (on behalf of Scotia Gas??)	<p>Support the revised allocation as it allows for a greater degree of flexibility for alternative, higher value uses on the site. The allocation should however be widened to include uses such as for bulky trade operators where there is the need.</p> <p>Suggest the following amendment; <i>“Allocate for residential-led mixed use and/or mixed use employment generating uses”</i></p>	<p>Noted. See comment above.</p>
Daniel Watney LLP on behalf of Prime Place Ltd	<ul style="list-style-type: none"> • Access issues and flood risk will impact upon the sites deliverability. • The land would require decontamination and remediation works which are significant and costly barriers to overcome and as a result the scheme may not be financially viable particularly with the low numbers proposed. • Flood mitigation measures may reduce the developable space. • The site has a poor PTAL score. The proposed residential and employment uses could result in additional congestion along Homesdale Road 	<p>The access issues and flood risk impacts upon the sites deliverability are noted. Any issues affecting site viability e.g. decontamination should be set out in a financial viability assessment which should accompany any future planning application The traffic and transport analysis will be assessed at the planning application stage.</p>
Thames Water	<p>On the information available to date Thames Water do not envisage infrastructure concerns regarding Water Supply capability or waste water infrastructure capability in relation to the site.</p>	<p>Noted</p>
Ms Roisin Robertson – Area Networker Greenpeace S.E.London, Greenpeace – Bromley	<p>It is important to remember that all housing developments include units which are relevant to local residents – namely socially rented and affordable housing. It is also important to remember the environmental criteria for energy generation and adherence to eco-friendly design agreements.</p>	<p>Agreed – Any planning application received would be required to meet Building Regulations and Policy requirements relating to affordable housing.</p>
11 individuals concerned with traffic	<p>Traffic implications</p> <ul style="list-style-type: none"> • Congestion is currently heavy on Homesdale Road, Widmore Green and 	<p>Detailed traffic and transport analysis will be assessed in any future planning application</p>

implications of the development	<p>Bromley Common</p> <ul style="list-style-type: none"> Existing infrastructure cannot cope with additional traffic and parking from an additional 60 units Concerns regarding additional traffic in Liddon Road Appropriate consideration will need to be given to the increased number of cars parking and traffic flows 	
4 individuals	<p>Flooding concerns</p> <ul style="list-style-type: none"> Properties have recently suffered power cuts due to surface water flooding on Homesdale Road The existing infrastructure cannot cope with an additional 60 units 	<p>The site is located within Flood Zone 2 and the area has a high risk of surface water flooding. The Strategic Flood Risk assessment will need to demonstrate that there are no reasonably available sites in Zone 1. If this sequential test is met, as a “more vulnerable” land use, residential development in Zone 2 is theoretically acceptable but any development should aim to reduce flood risk in the wider area through the layout and form of the development and the appropriate application of sustainable drainage systems.</p>
3 individuals	<p>Other infrastructure impacts</p> <ul style="list-style-type: none"> Existing primary schools are full There is a need for education provision in Bromley Town Centre 	<p>The infrastructure requirements for the amount of development proposed in the Local plan will be assessed in the Infrastructure Delivery Plan. CIL and S106 may be used to ensure necessary infrastructure can be adequately funded. The Local Plan is also allocating sites for education to meet the projected need for school places for the life of the plan.</p>
2 individuals	<p>Impact on character Structure and appearance of area could shift if high rise blocks are proposed</p>	<p>The impact of the proposed development on the character of the area will be a key consideration of any planning application submitted. Regard will need to be had to the proposed amount and density of development.</p>
4 individuals	<p>Other</p> <ul style="list-style-type: none"> Concerns re loss of light to properties in Liddon Road The area needs 3-4 bed houses or flats with large outside space. If the Waldo Road refuse site were to be relocated and a secondary school moved to that site then 60 residential units would be feasible on the Gas Holder site Would like to see the site extended back to Homesdale Road to tidy up the area near Tescos entrance Can the site be turned into open fields or a nature park for residents to enjoy There are already enough flats and buildings around Liddon Road 	<p>Noted. The planning application will assess the impact of the development on the residential amenity of neighbouring properties and minimise/mitigate as appropriate.</p> <p>Noted – there are currently no plans for the relocation of the Waldo Road refuse site.</p> <p>Further information on land ownership within the site boundary and adjoining the site to be obtained. Discussions to be had with adjoining land owners (Tesco).</p> <p>There are no details currently with regard to the size and or type of residential unit proposed for this site. The detailed planning application will assess the development proposed. Currently, for the Borough as a whole, the greatest need is for 2 bed properties.</p>
Mr Adrian Lawrence – Director Lanniston	<p>The site is contaminated and not suitable for residential units which would be likely to have limited amenity space and be sited above commercial premises and close to a Council Waste Depot. Children being brought up in such an environment would suffer with ensuing health problems that this has been proven to cause. The site should be</p>	<p>Further assessment and analysis of the level of contamination on the site to be carried out. Any future planning application will need to include details of proposed decontamination.</p>

Developments	allocated for business use only.	
Mr Christopher Seal	The development in principle will benefit the area. However, 153-163 Homesdale Road are marked as a business area on the map, but these are residential properties and have been since the 1900's. The residents of the properties in this area would not want to have noisy items or unsanitary areas backing onto gardens.	<p>Noted. The area is designated as a business area in the Adopted Unitary Development Plan 2006. In the Feb 2014 Local Plan Draft Policies and Designations Consultation the area was proposed as an LSIS (Locally Significant Industrial Site). The boundary for the proposed LSIS excluded the residential properties at 153-163 Homesdale Road.</p> <p>However, since part of the proposed LSIS has now been put forward as a site allocation for mixed use development the LSIS is now considered inappropriate for this site.</p> <p>Recommend removing the existing Business designation (which covers the gasholder site, adjoining business premises on Liddon Road, the residential properties on Homesdale Road and the adjoining Tesco retail Store) and also remove proposed LSIS designation.</p>
The Labour Group	<p>Is the Business Designation realistic or necessary.</p> <p>No information on ownership</p>	<p>Recommend removing existing Business Designation and proposed LSIS.</p> <p>Further information on land ownership to be obtained.</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Living in Bromley – New sites

Site: Orchard Lodge, William Booth Road, Anerley

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: New site put forward for Site Assessment

1 email response was received

Respondent	Summary of issues	Officer comment
Fairview New Homes Ltd	<ul style="list-style-type: none">• 1.8 ha site comprises previously developed brownfield land• Existing buildings on site up to five storeys• Site access from William Booth Road via Anerley Road• Formerly used as secure young offenders institute, now vacant• Bounded to north, east and west by residential uses, of two to five storeys, and to the south by James Dixon Primary School and former Orchard Sports Ground which is designated Metropolitan Open Land (MOL)• Not designated Green Belt or MOL, not within Conservation Area, contains no listed buildings or protected vegetation• Pre-application inquiry held in May 2015• Proposing redevelopment of site for 250 dwellings over next three years (subject to Council adoption)• Site is suitable, available and having realistic prospect of build out within upcoming five year period• Requests allocation of site for residential use	<p>The suitability of the site for allocation for residential use is assessed in further detail, against the criteria established in the London Borough of Bromley's Site Assessment 2015: Housing and Mixed Use, in the attached Site Assessment table.</p> <p>Redevelopment of the site would result in an overall loss of land that has previously been used for community facilities (although it is noted these uses were specialist facilities that catered for a broad catchment and did not require siting at this specific locality). Further investigations were undertaken into the possibility of the site contributing towards the Borough's general community facilities and educational needs. These investigations confirmed that deliverability and capacity issues precluded the allocation of land on this site for the purposes of education or community facilities.</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Living in Bromley – Sites assessed and not proposed for residential/mixed use allocation

Site: Land north east of Princes Plan, Bromley Common (Green Belt site)

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Retain Green Belt designation. Not allocated for residential/mixed use

52 responses were received – 50 emails, 2 responses online.

Respondent	Summary of issues	Officer comment
42 individuals; Lanniston Developments Ltd	Local social/physical infrastructure <ul style="list-style-type: none"> • Development would provide much needed housing • Development would secure the long-term future of Bromley Youth Music Trust • Low cost/starter homes are needed for the younger people of Bromley • Housing would not be high rise • Housing alongside the BYMT makes for a cohesive community 	The London Borough of Bromley’s (LBB) evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and throughout the Emerging Local Plan period, through allocated and windfall sites, without any further incursion into the current Green Belt boundary. Further, the Draft Allocations, Further Policies and Designations 2015 (DAFPD) document identifies instances where “exceptional circumstances” warrant changes to the current Green Belt boundary, comprising the Biggin Hill Strategic Outer London Development Centre, expansion of existing schools and creation of new schools. The LBB recognises there is a wish of some landowners to submit their sites for potential housing supply. However, the DAFPD document finds no instances where “exceptional circumstances” support amendments to the current Green Belt boundary for these purposes.
35 individuals; Lanniston Developments Ltd	Legal matters <ul style="list-style-type: none"> • The circumstances surrounding the Green Belt land constitute exceptional circumstances • The purpose of local plan reviews are to re-designate land where it is considered appropriate • The site no longer fulfils the purpose of Green Belt land • The Green Belt boundary should be realigned to a more logical position 	
37 individuals	Utility of the site <ul style="list-style-type: none"> • Site has existing settlement on three sides and an underutilised recreation ground on the fourth • The site is isolated • Princes Plain is not the only green spot in Bromley • Site is ideal for housing as it is located close to a public open space, transport and schools • Development already around the site will stop any urban sprawl • Bromley is not short of Green Belt land • Local residents do not use the land 	Noted, see above also.
33 individuals	Impact on enjoyment of the area <ul style="list-style-type: none"> • This plan will support young people and establish a solid foundation for the future • This scheme will be a major asset to local people and businesses • The development of the BYMT will give young people a purpose • Music can provide benefits to health and mental well-being • We should be encouraging children to take up music 	Noted

3 individuals	Impact on the character of the area <ul style="list-style-type: none"> • Custom/self-build houses will set a precedent on housing design and discounts for first-time buyers 	Noted. Any planning application that is submitted for development will be assessed against the Council's adopted policies.
3 individuals	Local economy <ul style="list-style-type: none"> • Work will provide much needed work for tradespeople in the local area 	Noted
1 individual	Alternative sites <ul style="list-style-type: none"> • Brownfield land leads to cramped, ill-thought out development with high population densities, traffic problems and a lack of green space 	Planning applications are assessed against the Council's adopted policies and detailed traffic implications and parking requirements would also be assessed at planning application stage.

Site: Various Sites within Green Belt

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Not allocated for residential/mixed use

14 email responses were received

Respondent	Summary of issues	Officer comment
Robinson Escott Planning LLP	<p>Submission Overview</p> <ul style="list-style-type: none"> Relates to 2.8 ha site known as 'Land west of Randolph Road, Bromley Common' (including Jackson Road Nursery site) Adjoins residential to north and west, rural land to south and east. Beyond rural land is recent residential on former Lennard Hospital site Existing uses on Jackson Road Nursery site are nursery purpose, including greenhouses, barns and associated uses (0.81 ha site) Within walking distance of numerous bus routes on A21 LBB's site assessment is flawed, adopts "policy on" approach Many designation boundaries have existed without review for considerable period. Suggests full, transparent Green Belt and open space boundary review prior to any subsequent assessment Construction of new buildings not inappropriate where it comprises partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it (NPPF, paragraph 89) <i>Requests removal of site from Green Belt and "sensible rounding off" of boundary, due to neighbouring rural land becoming isolated</i> 	<p>The London Borough of Bromley's (LBB) evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and throughout the Emerging Local Plan period, through and windfall sites, without any further incursion into the current Green Belt boundary. Further, the DAFPD document identifies instances where "exceptional circumstances" warrant changes to the current Green Belt boundary, comprising the Biggin Hill Strategic Outer London Development Centre, expansion of existing schools and creation of new schools. The LBB recognises there is a wish of some landowners to submit their sites for potential housing supply where these sites adjoin existing residential uses. However, the DAFPD document finds no instances where "exceptional circumstances" support amendments to the current Green Belt boundary for these purposes.</p>
Woolf Bond Planning for Messrs Taylor Wimpey UK Ltd	<p>Submission Overview</p> <ul style="list-style-type: none"> Relates to 2.8 ha site known as 'Land west of Randolph Road, Bromley Common' (including Jackson Road Nursery site) Surrounded by built form, including Bromley to north, Locksbottom to the south, and within accessible distance of schools, facilities, jobs Site is within Flood Zone 1 Partly developed Lack of consideration of sites in Green Belt compromising LBB's ability to meet its housing targets for immediate 5 year period and Local Plan period. Site could accommodate 100 dwellings, including a mix of market and affordable housing, and public open space <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	<p>Site specific assessments of each of the twelve sites contained in this table, as produced in the LBB's Site Assessments 2015: Housing and Mixed Use document, are attached. No variations to these site specific assessments are proposed.</p> <p>1</p>
1 individual	<p>Submission Overview</p> <ul style="list-style-type: none"> Relates to site known as 'Land at Oakley Farm, Bromley Common' LBB policy of retaining site as Green Belt is inconsistent with NPPF paragraph 83 Description of site as being at end of continuous tract of Green Belt along Bromley Common towards Hayes Lane is inaccurate. Site is segregated from the remainder of Green Belt by Oakley Road and shares similarities with Oakley Road allotments now developed for residential 	

	<ul style="list-style-type: none"> • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
Robinson Escott Planning LLP	<p>Submission Overview</p> <ul style="list-style-type: none"> • Relates to site known as 'Land at Potters Yard, Turpington Lane / Bromley Common, Bromley' • Comprises previously developed land in Green Belt having regard to definition set out in NPPF, Annex 2 • Bounded to north and east by residential flat buildings and to south by Bromley West Kent Sea Cadets buildings and parade ground • Contains several buildings, parking and hard standing areas • LBB's site assessment is flawed, adopts "policy on" approach • Many designation boundaries have existed without review for considerable period. Suggests full, transparent Green Belt and open space boundary review prior to any subsequent assessment • Construction of new buildings not inappropriate where it comprises partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it (NPPF, paragraph 89) • Blue Circle/Trinity Village residential development received permission by Secretary of State in 2007, resulted in segregation of Potters Yard and Bromley West Kent Sea Cadet sites from remainder of Green Belt • More logical boundary would result from adjusting boundary to run along Turpington Lane and then northwards on A21 • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
Robinson Escott Planning LLP	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to 0.5 ha site known as 'Ruxley Cottage, Maidstone Road, Sidcup' • Adjoins Maidstone Road to north and further Green Belt land to south, on boundary with Bexley Borough • LBB's site assessment is flawed, adopts "policy on" approach • Many designation boundaries have existed without review for considerable period. Suggests full, transparent Green Belt and open space boundary review prior to any subsequent assessment • Site would not constitute inappropriate development, provided that the scheme did not conflict with 'openness test' under NPPF paragraph 89. • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
Robinson Escott Planning LLP	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to site known as 'Land at Thornet Wood Road, Bickley' • Located on eastern side of Thornet Wood Road, bounded to north and east by residential, to west by Bickley Manor Hotel and grounds and to south by open land (playing field for former Aquila research establishment to east, now residential) • LBB's site assessment is flawed, adopts "policy on" approach • Many designation boundaries have existed without review for considerable period. 	

	<p>Green Belt previously included Aquila site to east, but now excludes this land</p> <ul style="list-style-type: none"> • Suggests full and transparent Green Belt and open space boundary review prior to any subsequent assessment • Inspector's report into Bromley Unitary Development Plan 2006 concluded that nearby land on Blackbrook Lane had accessibility comparable to many suburban areas of Bromley and was moderately well served by local services • Would form a finger of Green Belt adjoined on two sides by housing and by Thornet Wood Road on third side. More logical to continue boundary along southern side of housing on former Aquila site until Thornet Wood Road, thus excluding site and former playing field • Site is presently overgrown with self-sown saplings. No physical constraints to development. Site has a road frontage, is generally flat and is suitable and achievable for new housing, would not prejudice wider strategic function of Green Belt • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
<p>Daniel Watney for The Fairworth Gospel Hall Trust</p>	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to 1.174 ha site known as 'Former MOD Playing Field, Thornet Wood Road, Bickley' (described in representation as 'Land to the east of Thornet Wood Road, Bromley') • Confusion over description of two sites located at Thornet Wood Road included in Site Assessments 2015 document • Within walking distance of 2 train stations and strategic bus route to Orpington • Green Belt Review needed to identify and release suitable sites for residential. • Site could supply 41-65 new dwellings • Site is area of low landscape quality on edge of settlement boundary and screened by trees, will have no wider visual impact on character and openness of Green Belt • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
<p>Maddox Associates for Iris Estates Limited</p>	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to 19 ha site known as 'Land bounded by The Highway, Warren Road & Orpington Bypass, Chelsfield' (referred to as 'Land north of Warren Road, Chelsfield' in representation) • Site could supply 480-800 dwellings • Walking distance to Chelsfield Station, R3 and R8 bus routes, local facilities at Windsor Drive and Court Road • Previously promoted by GL Hearn • Supports reviewing of Green Belt boundaries to enable educational expansion, could be coupled with residential led mixed use • Need for delivery of almost double target set out in Emerging Local Plan for consistency with objectively assessed housing need • LBB will rely heavily on large portion of windfall sites to meet London Plan housing target, has not provided compelling evidence that such sites have consistently become available to provide reliable source • Inspector's report into Bromley's Unitary Development Plan 2006 noted subject site 	

	<p>suitable for consideration for Green Belt release</p> <ul style="list-style-type: none"> • Site Assessment 2015 focuses on designations and physical constraints rather than whether a site is deliverable • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
<p>Indigo on behalf of Lands Improvement Holdings</p>	<ul style="list-style-type: none"> • Relates to 16.9 ha site known as 'Land at Griggs Cross, St Mary Cray' (referred to as 'Griggs Cross Farm' in representation) • Bounded to north and south by housing, to west by housing and St Mary Cray Recreation Ground, to east by open fields • Agricultural land, includes two public rights of way which can be retained/enhanced in development, could yield 350-500 dwellings • No TPOs, no listed buildings, not within or adjoining Conservation Area. Land to west of site, including St Mary Cray Recreation Ground, is Area of Archaeological Significance • Access achievable through providing priority junctions on Chelsfield and/or Cockmannings Roads to south (links to A224) and Crockenhill Road to north (providing east-west link between M20/M25 and A224) • Walking distance of bus stops connecting to St Marys Cray, Orpington train stations. Nine primary schools within 2km, three secondary schools within 3km, Orpington within 3km has services such as medical centres, leisure centre. Well related to Cray Business Corridor • Development of site would retain large separation of Green Belt space between built up area and nearest town, Crockenhill, of over two miles • Ecological significance unlikely, but Site of Importance for Nature Conservation to west, Site of Special Scientific Importance 2km to north. Would seek to retain any value. Conversion to residential would boost biodiversity potential through new green space elements. • In Flood Zone 1, would incorporate Sustainable Urban Drainage Scheme • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
<p>Crest Nicholson</p>	<ul style="list-style-type: none"> • Relates to 1.7 ha rectangular site known as 'The Drift, Croydon Road, Keston' • Bounded by Ravens Wood School for Boys to north, 'The Drift' lane to west (primary access, shared with 8 dwellings, school), Croydon Road (A232) to south, Keston Methodist Church site (vacant), Wyevale Garden Centre to east • Surrounding land is mostly residential, with SE containing local services. Methodist Church subject of approvals for restaurant for Garden Centre and three dwellings • Largely level, gentle slope towards Ravens Wood School, grassland with sporadic shrubs. No statutory or non-statutory ecological significance. Site of Special Scientific Importance located 0.5km to south, separated from site by residential. Bushes and hedges proposed to be retained with housing where practicable. No drainage constraints • Informal cultivation in SW corner (private short term lease, charitable activity, not protected). Access restricted by fencing and mature vegetation • Junction of A232 and A233 is 100m east of site. Within walking distance of Red Route 	

	<p>bus services on A232 and A233, to Orpington, Croydon and other centres</p> <ul style="list-style-type: none"> • London Borough of Bromley's (LBB) assessment includes tenuous statements, "development could affect local views, the skyline or landmarks depending on its scale and design" and "proposed use could cause additional network congestion or highway safety concerns" • LBB's site assessment in absence of thorough Green Belt review • Site previously put forward but rejected by LBB. Further planning application refused by LBB and Inspector, who considered the benefits of housing not to outweigh the loss of Green Belt land • Does not fulfil functions of Green Belt outlined under National Planning Policy Framework • Could accommodate 80 dwellings • <i>Requests that the Green Belt designation be removed and the site be allocated for housing</i> 	
1 individual	<ul style="list-style-type: none"> • Relates to 1.8 ha site known as 'Land between 57 and 69 Fox Lane, Keston' • Interest in developing land for limited residential use, having applied unsuccessfully for planning permission in 2003 • Reiterates three Options to alter Green Belt to enable one or two detached dwellings to be constructed, already identified in LBB's Site Assessment 2015 document as Options 1, 2 and 3 • <i>Requests that the Green Belt designation be removed and the site be allocated for housing (as described in Options 1, 2 or 3)</i> 	
1 individual	<ul style="list-style-type: none"> • Relates to 1.8 ha site known as 'Land between 57 and 69 Fox Lane, Keston' • Supports altering Green Belt and redevelopment of site for limited residential use • <i>Requests that the Green Belt designation be removed and the site be allocated for housing (as described in Options 1, 2 or 3)</i> 	
1 individual	<ul style="list-style-type: none"> • Relates to 1.8 ha site known as 'Land between 57 and 69 Fox Lane, Keston' • <i>Requests that the Green Belt designation be removed and the site be allocated for housing (as described in Option 1)</i> 	
NLP for Development Securities PLC	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to site known as 'World of Golf, Chislehurst' • Bounded by A20 to north, existing residential to west and further Green Belt Land to east. Planning application has been lodged for land to east (Flamingo Park site) which, if approved, would result in site being surrounded by built form • LBB housing allocations based on earlier SHLAA based assessment rather than larger target emerging from objectively assessed need • Could accommodate 450-500 new dwellings of mixed density, including affordable housing, plus new internal public open spaces • Does not fulfil purposes of Green Belt under NPPF paragraph 80: permanently open, checks unrestricted sprawl, prevents neighbouring towns merging, assists safeguarding of countryside, preserves setting and special character of historic towns 	<p>Officer comments are as above</p> <p>Additional Note: The LBB has received a planning application (15/03053/FULL1) on 14 July 2015, for the adjacent land to the east (Flamingo Park site). The application is for demolition of existing buildings and erection of a two/three storey football stadium with ancillary uses, sporting fields and parking, plus new housing (28 units). This application is currently being considered separately and will not alter the LBB's consideration of the 'World of Golf, Chislehurst' site.</p>

	<p>and assists in urban regeneration by encouraging recycling of urban land</p> <ul style="list-style-type: none">• <i>Requests that the Green Belt designation be removed and the site be allocated for housing, or that the site be considered for 'safeguarding' to meet longer-term development needs beyond the plan period (under NPPF paragraph 85)</i>	
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Site: Various Sites not within Green Belt

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Not allocated for residential/mixed use

5 email responses were received

Respondent	Summary of issues	Officer comment
NLP for Tesco	<p>Submission Overview:</p> <ul style="list-style-type: none"> • Relates to 2.1 hectare site known as 'Land rear of Tesco, Edgington Way, Cray Valley East' (within Foots Cray Business Area Strategic Industrial Location) • Emerging Local Plan document identifies site within clusters of land that fall inside the Cray Business Corridor Strategic Industrial Locations (SIL) • Site is unused and is surplus to Tesco's requirements • Site is adjoined to the south by the A21 (no direct access) and to the north and east by Tesco superstore and Jaguar dealership. Access to site is shared with Tesco and Jaguar businesses and a bus interchange and lay over • Accessible location within 1km of Tesco superstore, Foots Cray neighbourhood centre, education uses and various bus services • Site has capacity for 100-125 dwellings over 3-4 storeys • Site has failed to attract business investment over many years, never used for "employment" purposes" over this period • Site is segregated from rest of Business Area by lack of road frontage, limited potential for business purposes due to topography, size and proximity to nature reserve. Linkages to nearby Bexley Borough business uses are questionable • Questionable value of surrounding area to continue to serve SIL for Local Plan period. High concentration of non B class land uses, fewer larger format industrial uses associated with a SIL • London Borough of Bromley's (LBB) evidence base identifies falling requirement for industrial space, surplus of business floor space to meet needs over Local Plan period. LBB can afford to release some industrial land whilst still be able to meet objectively assessed need for business floor space • Pressing need for more homes in Bromley. Analysis by NLP suggests LBB proposed supply falls well short of minimum supply threshold. Reliant on substantial portion of windfall sites (46% of supply) • <i>Requests removal of SIL designation from site and allocation for residential use</i> 	<p>The subject land is located in the Foots Cray Business Area, identified as a Strategic Industrial Location (SIL) (category: Industrial Business Park) under the London Plan. The format and location of the site are consistent with the London Plan's description of Industrial Business Park land. Therefore, the site should be retained under its present allocation to enable future Industrial Business Park related development.</p> <p>The LBB's evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and the Emerging Local Plan period, through release of brownfield and windfall sites and without revision to any strategically significant employment lands, such as the Foots Cray Business Area SIL.</p>
Quod for SGN	<p>Submission Overview</p> <ul style="list-style-type: none"> • Relates to 0.6 ha site known as 'Gasholder Station, Lessons Hill/Sevenoaks Way, St Mary Cray' (within St Mary Cray SIL) • SGN decommissioning several sites across UK as a result of storage being replaced by underground pipe network, requests proactive planning approach from Council • Sites should be allocated for uses of sufficient value to ensure redevelopment is viable (taking into account remediation / enabling costs). B Class uses not realistic redevelopment opportunities • Subject site contains 3 gas holders with associated works and hard standing areas • Objects to continued inclusion in Business Area designation, which would stymie 	<p>The subject land is located in St Mary Cray SIL (category: Industrial Business Park) under the London Plan. The format and location of the site are consistent with the London Plan's description of Industrial Business Park land and the draft Local Plan's intent for the Cray Business Corridor. It is considered that the site can reasonably contribute to the Borough's confirmed industrial needs over the Local Plan period, while there is insufficient evidence suggest there are insurmountable barriers to the continued use of the site for uses consistent with the SIL designation.</p>

Respondent	Summary of issues	Officer comment
	<p>future development of gas holder site in perpetuity</p> <ul style="list-style-type: none"> • <i>Requests removal of Business Area allocation and reallocation as ‘white land’, to enable market to determine appropriate future use for site</i> • <i>Requests new policy included in emerging Development Plan specifically to recognise London Plan policy 5.22. Suggested policy: “Hazardous Installations will be identified in the Local Plan. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal”</i> 	<p>Therefore, the site should be retained under its present allocation to enable future Industrial Business Park related development.</p> <p>The LBB’s evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and the Emerging Local Plan period, through release of brownfield and windfall sites and without revision to any strategically significant employment lands, such as the St Mary Cray SIL.</p> <p>The Emerging Local Plan is being prepared in compliance with policies of the London Plan including Policy 5.22 Hazardous Substances and Installations. It is considered that this provides adequate guidance for considering planning applications on sites potentially requiring remediation.</p>
<p>CBRE for Mike Corby Properties Ltd</p>	<ul style="list-style-type: none"> • Relates to 10.6 ha site known as ‘Former Natwest Bank Sports Ground, Copers Cope Road, Beckenham’ • Located in Metropolitan Open Land (MOL), bounded by Copers Cope Road to east, Hayes to Charing Cross railway line to west, Worsley Bridge Road to north and residential to south • Currently predominantly used for recreation, includes Beckenham Gym, children’s activities centre, grass pitches, 5-a-side football pitches, bowling green, pavilion and disused tennis courts. Some existing buildings detract from MOL amenity • National Planning Policy Framework’s encouragement of allowing applications that would improve economic, social and environmental conditions in an area, whilst helping meet development needs, should be reflected • Site does not serve the purposes for Green Belt, set out in London Plan, which could equally apply to MOL land. Privately owned, not publicly accessible • Redevelopment for residential could be coupled with provision of publicly accessible passive or active recreation space, which would minimise adverse impact on openness of MOL • Single ownership, in accessible location close to infrastructure does not contain contaminated land • Contains areas of Flood Zone 2 and 3, but development could exclude these areas • Precedents for housing permitted in MOL: 91-117 Copers Cope Road, for 39 dwellings, granted in 2011 by the London Borough of Bromley (LBB) following appeal; Kent County Cricket Ground, Worsley Bridge Road, for 48 dwellings, stadium, health facilities, granted in 2013; Dylon International Works, Worsley Bridge Road, for mixed use with 74 dwellings, granted in 2015 • <i>Requests removal of Metropolitan Open Land designation and allocation for residential use</i> 	<p>The site in question is designated as Metropolitan Open Land (MOL), consistent with London Plan Policy 7.17, given that it contributes to the key function of the broader locality of providing high quality open air facilities for leisure, recreation and sports activities which serve significant parts of London. The site and its primary functions are also contiguous with surrounding MOL in the Beckenham area, thereby contributing to the physical structure of London by being clearly distinguishable from the built up area. Removal of the MOL designation would result in an unacceptable loss of land providing for high quality open air facilities and unnecessarily fragment this contiguous section of MOL across the broader Beckenham locality.</p> <p>Additionally, the LBB’s evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and throughout the Emerging Local Plan period, through release of brownfield and windfall sites, avoiding any intrusions into current MOL areas.</p>

Respondent	Summary of issues	Officer comment
Robinson Escott Planning LLP	<p>Submission Overview</p> <ul style="list-style-type: none"> • Relates to 1.6 ha site known as ‘Land at North Drive, South Eden Park Road, Kelsey and Eden Park’ (within Urban Open Space) • Bounded on all sides by residential, Chinese garage dealership • Immediate access to several bus routes, within walking distance of local shops, community and educational facilities • Previously part of former Glaxo/Wellcome laboratories. Majority of the laboratories site redeveloped for residential and other purposes, site is last remaining undeveloped part of laboratories land • Land transferred by Glaxo/Wellcome to LBB in late 1990s for use as primary school site, as part of redevelopment of whole site. Site is too small to accommodate a school so land swap occurred with developer of remainder of site to develop what is now Unicorn Primary School • Section 106 agreement with LBB which attributed a monetary value to new school site which would be deducted from the development land value of the northern land • LBB subsequently redesignated site from Metropolitan Open Land to Urban Open Space • Review should be undertaken because of materially changed circumstances regarding development of Glaxo/Wellcome site • Site is private land with no public access, is well screened and provides no visual open space contribution to the area, while there is already several visual breaks in locality • <i>Requests removal of Urban Open Space designation from site and allocation for residential use</i> 	<p>The LBB considers that all areas identified as Urban Open Space fulfil specific functions within their localities and provide important breaks within the built-up area, irrespective of whether they have public access. Draft Policy 8.20 Urban Open Space of the Emerging Local Plan also states that proposals for built development in Urban Open Space will be permitted only if it relates to the existing use or is small scale and supports outdoor recreational uses.</p> <p>The LBB’s evidence base demonstrates it can meet its housing supply obligations under the London Plan for the immediate five year period and throughout the Emerging Local Plan period, through release of brownfield and windfall sites, without any intrusions into current Urban Open Space areas.</p>
Savills on behalf of Methodist Homes	<ul style="list-style-type: none"> • Relates to site identified in representation as ‘St Raphael’s Care Home, Orchard Road, Bromley’ (New Site) • Submission follows prior representations to London Borough of Bromley’s (LBB) Draft Policies and Designations Consultation (DPDC) document in February/March 2014, should be read in conjunction with these representations • Site previously used for ‘care home’ (Class C2), closed in 2015. Extra care housing treated as residential dwellings (Class C3) • Application lodged with LBB in May 2015 to redevelop care home to provide retirement living with care scheme of 77 dwellings, with resident facilities and 49 parking space • LBB has second highest annual requirement for specialist elderly accommodation across London boroughs • Policy 5.11 of Emerging Local Plan supports provision of specialist housing across all tenures. DPDC document highlights shortage of specialist elderly market accommodation. Agrees with intent to provide specific policy support for specialist housing, maximise use of existing specialist housing sites and remove ambiguity around use classes in respect of accommodation for elderly • DAFFPD document does not specifically outline specialist elderly accommodation, does outline need to ‘ensure there is an appropriate supply of homes to meet the varied 	<p>The current policy setting does not prevent the proposed redevelopment coming forward as a planning application. Therefore, the requested allocation for specialist elderly accommodation is considered unnecessary and is not supported.</p>

Respondent	Summary of issues	Officer comment
	<p>needs of the local population, which responds to changing demographics, in particular as the population ages'. Supports approach, recommends that LBB retain existing elderly accommodation sites for such uses.</p> <ul style="list-style-type: none"><li data-bbox="333 225 1133 248">• <i>Requests allocation of site for specialist elderly accommodation</i>	

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Living in Bromley – Specialist Accommodation

Objective / Policy / Issue	Respondent	Summary of issues	Officer Comments
5.11 Specialist & Older Peoples Accommodation	1 individual	Support - There should be more encouragement to build accommodation specifically for elderly based on the model described. They should be made so appealing that older people would be tempted to give up their larger houses to free up accommodation for families.	Support Welcomed
5.11 Specialist & Older Peoples Accommodation	Affinity Sutton	We welcome the aspirations to deliver an increasing level and quality provision of housing for older people. Affinity Sutton has a range of housing that is occupied by older residents including three extra care schemes within the borough. Today's older residents tend to have different needs and aspirations to those in the past. In our extra care scheme we are experiencing high levels of voids - despite refurbishment much of our stock designated for older residents is no longer desirable, as newer more desirable schemes are developed.. Our research indicates that a choice of provision is needed to match the aspiration of this growing population, and there is a growing pre-retirement cohort who are not always looking to live in separate enclaves, but wish to be integrated into mixed communities. We have launched our "Live Smart" initiative which is a new approach to older people's housing focusing on independence and offering a choice of services. Recent research by Demos (Demos (2013) Top of the Ladder http://www.demos.co.uk/projects/topoftheladder) quantifies levels of under occupancy amongst older people in both the public and private sector and the potential for this ageing population to downsize.	Support Welcomed and research noted and now also covered effectively by the Mayoral Housing SPG.
5.11 Specialist & Older Peoples Accommodation	Savills for Methodist Homes (MHA)	Support for the policy, in particular maximising the use of sites currently providing specialist accommodation. The supporting text to 5.11 notes the ambiguity in the Use Class classification which relates to the nature of care. But the Council indicates Care Homes Class D2, Extra Care type housing developments are treated as residential dwellings C3 and therefore subject to other residential policies, including affordable housing policies - Affinity Sutton have some concerns regarding the classification of all extra care housing class C3, The London Housing SPG highlights that whilst consultants have suggested the "front door" test of self containment the consideration requires more refinement to take appropriate account of the components of care and support such as those associated with some Extra Care schemes where units may have their own front door but functionally are effectively C2. To be consistent with the London Housing SPG an assessment of whether a proposal for specialist elderly persons accommodation falls within a C2 or C3 use should be assessed on an individual site by site basis and this should be reflected in the supporting text and Council SPG.	Support welcomed The recently published Mayoral Housing SPG (2016) highlights that consultants suggest the "front door test" as being the most robust way of distinguishing whether a use is C3, but notes that where proposals are justified by identified need they may functionally be effectively C2. Irrespective of use class Bromley's Adopted Housing SPG clarifies that sheltered housing and extra care homes are subject to the affordable housing policies .
5.11 Specialist &	Affinity Sutton	We welcome the clarification of classification of use classes covering	Support welcomed.

Older Peoples Accommodation		homes for older people, and removing the requirement for affordable contributions of elderly specialist accommodation.	The proposal to remove the requirement for affordable housing has been reconsidered in light of the London Plan 2015 and the Mayoral Housing SPG (2016)
5.11 Specialist & Older Peoples Accommodation	Savills for Methodist Homes (MHA)	We support the proposal to amend the housing SPG to remove the requirement for affordable contributions from the full range of elderly specialist accommodation due to the perverse incentive that exists favouring care homes. The Council has advised that the intent is only to the remove the requirement for affordable “rent” contributions. Shared ownership requirements will remain. We support the recognition that there is an over supply of rental units for elderly persons and no requirement for such provision through S106 obligations. However, S106 contributions should be deleted across all elderly accommodation (as drafted). Cross reference should be made in paragraph 5.4 on affordable housing policy that distinct arrangements will apply to specialist accommodation for older persons accommodation.	<p>The London Plan highlights a need for intermediate housing for elderly people which has been reflected in the supporting text.</p> <p>The proposal to remove the requirement for affordable housing has been reconsidered in light of the benchmarks set within the London Plan 2015 for intermediate sale specialist housing and the Mayoral Housing SPG (2016) regarding need and viability.</p> <p>Removing the requirement for affordable provision, would prevent the development of the necessary intermediate provision. However, the viability implications for specialist older persons accommodation are recognised and bespoke viability assessments may be appropriate</p>
5.11 Specialist & Older Peoples Accommodation	GLA	Welcomes Bromley’s Policy 5.11 on Specialist & Older Peoples Accommodation that is in line with London Plan Policy 3.8. Highlights FALP Annex 5 benchmarks for Specialist accommodation for older people	Support welcomed

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Living in Bromley – Travellers Accommodation

Objective / Policy / Issue	Respondent	Summary of issues	Officer Comments
5.12 Traveller's Accommodation	Croydon Council	Welcome the supporting text statement that the Council will work with the London South sub region and neighbouring authorities outside London. Will be in contact following the Call for Sites refresh in the forthcoming months.	Croydon are currently proposing 3 Traveller Sites in their emerging Local Plan Continue to work cross borough with Croydon to ensure co-operation and, where appropriate, consistency.
Policy 5.12 Traveller's accommodation	English Heritage	In part iii) we suggest that local environment should be clarified to refer to 'the natural, built and historic environment' (para 7, NPPF).	Noted – Supporting text expanded to reference the natural, built and historic environment
Policy 5.12 Traveller's accommodation	London Gypsy Traveller Unit	<p>LGTU are concerned that the wording of draft Policy 5.12 does not set a target for pitches and argues that the same approach must be taken with Gypsy and Traveller pitch targets are with conventional housing in order to secure a fair and inclusive strategy.</p> <p>On the issue of equality and fairness, we would also wish to object to criterion iii. in Policy 5.12 for assessing new site proposals. The wording implies that Gypsy and Traveller sites can have a negative impact on surrounding residential amenity and the environment and we consider this inappropriate. We also object to criterion iv. placing so much emphasis on the constraints in the flood zones. We believe this flood risk can be mitigated the same as with conventional housing, and this criterion should commit to seek solutions rather than stop site development in these areas.</p>	<p>The need analysis is set out in the "Gypsies and Travellers and Travelling Showpeople Background Paper.</p> <p>Criterion iii is similar to criterion attached to the backland and garden development policy.</p> <p>The Planning Policy for Traveller Sites Policy B advises against locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Living in Bromley – Traveller Sites

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: To allocate as Traveller Sites.

Respondent	Summary of issues	Officer Comments
<p>11 individuals; Campaign to Protect Rural England</p>	<p>General Issues:</p> <ul style="list-style-type: none"> • The Green Belt should be permanently protected, and should not be removed for this designation; • If the sites are re-designated then it removes the possibility of it being returned to open green land in the future; • There is a knock on effect on surrounded designated space as it would no longer constitute a clear stretch with designated protection; • Difficult to maintain new boundaries; • Although there is proven need for traveller sites, they shouldn't be placed in the Green Belt ; • The allocation for 'travellers' needs to be revisited as it is too generic and is an umbrella for various groups; • There must be a greater certainty over the provision of transit sites; 	<p>The Governments "Planning Policy for Traveller Sites" (PPTS) 2012 seeks to ensure that <i>"local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites"</i>.</p> <p>A Call for Sites did not produce any deliverable sites elsewhere in the Borough, from either within the urban or suburban areas</p> <p>The PPTS allows for the designation of sites within the Green Belt as "traveller sites only". The need for pitches is not projected to diminish.</p> <p>Enforcement action can be taken against unauthorised activity within or without the Traveller Site boundaries. Where clear boundaries are confirmed (NB Star Lane has no clear boundary) enforcement action on land outside can be more efficient.</p> <p>Any appeals against enforcement action will be easier to defend with the Council's ability to demonstrate that it has met the assessed need for sites.</p> <p>The PPTS addressed both Gypsy Travellers and Travelling Showpeople under the umbrella of "Travellers".</p> <p>The Council's approach to transit pitch provision is set out in the emerging Local Plan draft Policy 5.12 ("Local Plan Draft Policies and designations Consultation" 2014) indicates that the Council will "work with the sub region to secure their provision in an appropriate location within the sub-region".</p>
<p>3 individuals; Lanniston Developments Ltd</p>	<p>Traveller Accommodation : draft Policy 5.12</p> <ul style="list-style-type: none"> • Agreement that new traveller sites should lay 'outside any areas of constraint complying with Green Belt and other open space policies' but if they have settled onto a site that is Green Belt , it shouldn't be taken out of Green Belt . Everybody should be subject to the same planning laws; • Sending signals that pitching in a caravan on the Green Belt is acceptable, but hard working people applying to build homes on this land are prevented from doing so; 	<p>Local Plan draft Policy 5.12 sets out the policy to be applied to new sites following the adoption of the Local Plan. The consultation amends the policy to cover impacts on the amenity of adjoining land and to clarify that allocations safeguard sites for the purposes of a Traveller Site only, in line with the PPTS.</p> <p>The current allocations to address the outstanding need and</p>

	<ul style="list-style-type: none"> Taking out Green Belt land sets a precedent on re-definition of land; 	<p>will assist in ensuring that the Council can robustly defend the policy requirement that future sites lie outside any areas of constraint, comply with Green Belt and other open space policies.</p> <p>The methodology for site assessment did not reveal any more appropriate locations. The proposed allocations as “Traveller Sites only” in Green Belt are allowed for under the PPTS.</p>
7 individuals	<p>a) Star Lane:</p> <ul style="list-style-type: none"> The existing site is not being looked after; Utility blocks and existing facilities are run down; Existing pitches should be looked after before adding more; Opposition to the designation Support for the designation; Green Belt should not be given over in any circumstance; Traveller sites cause irreparable damage to land. 	<p>The site is a Council traveller site with existing permission. The day to day management and condition of this permitted site is not a planning function – concerns have been passed to the appropriate section.</p> <p>A consistent approach has been taken to permitted traveller sites to enable the future need for travellers to be met.</p> <p>The area recommended for removal from Green Belt is proposed to be been tightened around the Council traveller pitch boundaries.</p>
9 individuals	<p>b) Old Maidstone Road:</p> <ul style="list-style-type: none"> Traveller site at the end of the road is responsible for excess rubbish and fly tipping in the local area; Properties have been devalued as a result; An unregulated and badly managed traveller site is not needed, especially where council officers are afraid to approach for fear of reprisal; Opposed to the proposed allocation; Concerns over existing mess in the site; Photographs evident of the state of existing site, including fly tipping and abandoned vehicles; Support for the boundary; Green Belt should not be given over in any circumstance. 	<p>The site is a Council traveller site with existing permission required to meet the assessed accommodation needs of Travellers.</p> <p>The day to day management and condition of this permitted site is not a planning function – concerns have been passed to the appropriate section.</p> <p>A consistent approach has been taken to permitted traveller sites to enable the future need for travellers to be met.</p>
17 individuals; Woodland Trust.	<p>c) 148 Croydon Road:</p> <ul style="list-style-type: none"> Objection to the site being used for travellers; Exceptional circumstances do not exist for removing this site from Green Belt and re-designation as a traveller site; The location is inappropriate and is better protected from a planning perspective by being kept in the Green Belt ; The current private site still counts toward the Councils requirement on traveller plot numbers so the change of designation is unnecessary; If this change is made then strict controls need to be in place to ensure that the site does not grow; Objection to the site allocation as the site is adjacent to Colyers Wood (Ancient Semi-Natural Woodland); Special rules should not apply when the same amenities are used by 	<p>Permanent personal permission for this private site in the Green Belt has been granted on appeal, due in part to the lack of alternative provision in the Borough.</p> <p>The allocation as a “Traveller Site only”, as allowed for in the Planning Policy for Traveller Sites, enables the Council to demonstrate that it can meet the requirement for traveller pitches over the Local Plan period.</p> <p>The allocation sets a proposed boundary which reflects that approved by the Secretary of State to minimise the impact on the adjacent woodland.</p>

	<p>travellers and local residents;</p> <ul style="list-style-type: none"> • The development is inappropriate and harmful to the Green Belt ; • Bromley have failed to provide adequate management of the site; • Support for designation; • Planning permission on the site in 2013 for 5 pitches but subject to planning condition 3 restricting site to use of a particular family – once they left the site should be restored to previous condition; • The area adjacent and leading up to Keston Mark junction (A232) is oversubscribed for Bromley’s No. 1 accident spot; • Expanding the site is not in the best interests of the travelling community of the residing local community; • Authorised use for this site should not be granted. 	<p>Bromley Council do not manage this private site, although any breaches of planning conditions, as with residential properties, would be dealt with by the planning enforcement team.</p> <p>The A232 is managed by Transport for London although Bromley are working with TFL on junction improvements to address congestion. There have been some slight incidents at this junction but it is not the Borough’s No1 blackspot.</p> <p>The Council considered the highways implications of the application, recently granted permission on appeal. No highways objections were raised.</p>
8 individuals	<p>d) Meadow View, Saltbox Hill:</p> <ul style="list-style-type: none"> • Supports designation; • Opposes designation; • If the site hadn’t already been occupied by travellers it would be included in Natural England’s SSSI designation. Therefore it should remain Green Belt to keep it protected; • Green Belt land should not be given over in any circumstance. 	<p>The site benefits from a Certificate of Lawfulness for the stationing of caravans on this private site.</p> <p>The allocation as a “Traveller Site only”, as allowed for in the Planning Policy for Traveller Sites, enables the Council to demonstrate that it can meet the requirement for traveller pitches over the Local Plan period.</p> <p>The boundary of the proposed Traveller site allocation has been tightly drawn and is separated from the SSSI.</p> <p>The methodology for site assessment did not reveal any more appropriate locations outside the Green Belt. The proposed allocations as “Traveller Sites only” in Green Belt are allowed for under the PPTS.</p>
7 individuals	<p>e) Hockenden Lane, Western Site (adjacent Vinsons Cottages) and Eastern Site (Trunks Alley)</p> <ul style="list-style-type: none"> • Opposition to designation; • Support for the designation to meet need; • Protection of the Green Belt for the future is paramount; • Permanent changes to the Green Belt should not be made on a temporary requirement; • No special circumstances exist to support their proposal; • Similar developments in this area would be considered detrimental to the environment and refused; • Opposed because the site is in close proximity to residential areas; • Traveller sites cause irreplaceable damage to land. • The single pitch (Trunks Alley) site is too small to be a designated traveller site; 	<p>These two private sites already have permanent permission for a traveller pitches. The western site having been granted permanent planning permission in December 2015, subsequent to the publication of the 2015 consultation document.</p> <p>The lack of alternative appropriate locations and the previous temporary permission, are considered “exceptional circumstances” to warrant the allocation.</p> <p>The methodology for site assessment did not reveal any more appropriate locations outside the Green Belt. The proposed allocations as “Traveller Sites only” in Green Belt are allowed for under the PPTS.</p> <p>The allocation as a “Traveller Site only”, as allowed for in the Planning Policy for Traveller Sites, enables the Council to</p>

		<p>demonstrate that it can meet the requirement for traveller pitches over the Local Plan period.</p> <p>National guidance (PPTS) does not resist traveller sites in close proximity to residential areas.</p>
<p>8 individuals; IBA Planning</p>	<p>f) Layhams Road 6 sites including</p> <ul style="list-style-type: none"> ○ Large Travelling Showmen’s Site with permanent permission ○ A double plot travelling showmens site with temporary permission ○ 4 Gypsy Traveller sites (3 linked together) with expired temporary permissions <p>Comments as follows:</p> <ul style="list-style-type: none"> • Strong support for the removal of these sites from Green Belt ; • Opposed to designation; • Green belt should not be given over for traveller sites under any circumstance and should be protected; • Concern that policy fails to identify current need; • The policy for transit sites is too vague; • Historical, current and future needs must be adequately provided for; • The general approach will need to be appropriately controlled to prevent loss of sites for some groups. • Concerns re further incursion into the Green Belt and increase of traffic in a narrow lane; • The proximity of Layhams Road, Layhams Farm and land at junction of Sheepbarn Lane and Layhams Road to SINC (East) means the boundary needs to be well maintained to prevent any damage; • With the exception of Keston Traveller Site, Layhams Road, all traveller sites are opposed; 	<p>The need for Traveller sites is set out in the Local Plan evidence base document, “Gypsies & Travellers and Travelling Showpeople Accommodation Evidence Base Paper” (2015)</p> <p>There is no option to remove the existing Travelling Showman’s site which has permanent permission or the temporary permission for 2 additional plots until December 2019. Removing the temporary site after that period of the current sites with expired temporary permissions would not overcome the need to make provision and appeals against enforcement would be challenged on the grounds that no alternative provision is proposed. The site search and assessment has not produce alternative sites which would rebut that argument.</p> <p>The need is set out in the Travellers Background Document supporting the emerging Local Plan.</p> <p>The transit site policy reflects panel report into the London Plan, which recognised this as a sub regional matter.</p> <p>The allocation as a “Traveller Site only”, as allowed for in the Planning Policy for Traveller Sites, enables the Council to demonstrate that it can meet the requirement for traveller pitches over the Local Plan period.</p> <p>The Council considered the highways implications of the application at the junction of Sheepbarn Lane and Layhams Road, recently granted temporary permission on appeal - no highways objections were raised.</p>
<p>1 individual (site owner)</p>	<p>g) “Archie’s Stables”, Cudham Lane North In light of full planning permission on this privately owned site an allocation as a Traveller Site is sought.</p>	<p>The Draft Allocations, Future Policies and Designations document (Sept 2015) noted the permanent permission (granted the same day the document was agreed by Executive for consultation 15th July) and indicated that the site would be assessed using the agreed methodology. This assessment has been undertaken and in line with the consistent approach taken in respect of sites with permission in the Green Belt it is recommended that the site be allocated as a traveller site.</p>

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Living in Bromley – Renewal Areas

Objective / Policy / Issue	Respondent	Summary of issues	Officer Comments
Renewal Areas	English Heritage	It is important that the preparation of borough-wide characterisation studies (which are an essential tool for understanding and evaluating heritage assets and their capacity for change) underpin the proposals in regeneration areas or other areas of major change. Encourage the identification of heritage assets within the renewal areas and consider how they may provide the basis for an improved built environment. Any heritage assets 'at risk' within these areas should be the subject of special attention as part of a positive strategy for the historic environment. We provide details of the entries on the register as Annex A to these comments. English Heritage's on-line Heritage at Risk register can be accessed at: http://www.englishheritage.org.uk/caring/heritage-at-risk	Noted – may be included in guidance where appropriate.
Renewal Areas	1 individual	The map of the 20% or 40% 'most deprived areas' includes large areas with no residents. The criteria need to be changed to exclude parks or playing fields.	The shaded areas are based on the "Lower Super Output Area" boundaries – consider amending supporting text to explain the issue particularly in respect of Cray Valley East.
Renewal Areas	1 individual	Preserve Penge & Anerley libraries	Noted
Renewal Areas	The Beckenham Society	Add bullet on pg 53 "to preserve Anerley and Penge Libraries as a key focus for the enhancement of the cultural development and regeneration of those areas"	Noted – already appropriately covered by Policy 5.15 (see below)
5.13 - 5.17 Renewal Areas	Robinson Escott	Renewal Areas boundaries need to be precisely defined on a map	Noted
Policy 5.13 Renewal Areas	Bexley Council	Welcome the opportunity to work strategically across borough boundaries	Continue to work cross borough with Bexley to ensure co-operation and, where appropriate, consistency.
Policy 5.13 Renewal Areas	Croydon Council	Welcome 5.13iv regarding planning strategically across administrative boundaries. There is a clear joint ambition for Crystal Palace. Croydon are keen to be involved in the development of supplementary guidance or development briefs.	Continue to work cross borough with Croydon, other neighbouring boroughs and the GLA to ensure co-operation and, where appropriate, consistency.
Policy 5.13 Renewal Areas	English Heritage	Part i) reference to built heritage welcomed; however, since heritage assets fall within environmental considerations suggest wording is altered to read '...including built heritage and other environmental assets'.	Support Welcomed. Amended as suggested.
Policy 5.13 Renewal Areas	Cray Village Community Forum	Support the priority given to Renewal Areas	Support Welcomed
Policy 5.13 Renewal Areas	Cray Wanderers FC	Support the proposed Renewal Areas	Support Welcomed
Policy 5.13 Renewal Areas	Healthy Urban Development	Policy 5.13 Renewal Areas. We support criterion ii and would suggest a cross-reference to criterion i of Policy 6.4 Health and wellbeing requiring schemes in	Support Welcomed – The Mottingham and the Ravensbourne, Plaistow and Sundridge

	Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	renewal areas to address health impacts. Whilst there are policies for Bromley's 'Areas of Renewal', there this little attention given to the 'Places' in adjacent Boroughs which are areas of regeneration. Suggest that the concept of Lifetime Neighbourhoods is referred to.	Renewal Areas were originally identified partly in response to the areas of regeneration in adjacent boroughs, however in light of the more recent data this renewal area has been deleted. Lifetime Neighbourhood references have been added to the Boroughwide policies relating to health and wellbeing and the general design of development
Policy 5.13 Renewal Areas	Porta Planning LLP for William Nash (Chalk Pit Lane)	We support the identification of St Paul's Cray as part of the Cray Valley Renewal Area as set out in Policy 5.13 and request that this designation area is reflected on the Local Plan Proposals Map.	Support Welcomed
Policy 5.13 Renewal Areas	Orpington Field Club	Cray Valley Renewal area offers the opportunity to provide an improved green corridor for people and wildlife along the River Cray	Noted Additional clause in Cray Valley Renewal Area Policy
Policy 5.14 Sites and Development Briefs	Porta Planning LLP for William Nash (Chalk Pit Lane)	Support would welcome the opportunity to discuss the development potential of this site with Officers and the merits in preparing a Development Brief for Chalk Pit Avenue Site	Support Welcomed – Site Assessed and NOT recommended for release from Green Belt
Policy 5.14 Sites and Development Briefs	1 individual	Takes too narrow a view of its causes and cures. Deprivation can be caused by many factors – and in some cases is worsened by local or government policies which have the effect of directing people / accommodation types to particular areas. It is not necessary /desirable, to attempt to solve a local perceived problem through more development eg. denser housing, more traffic, less greenery etc. With a mobile workforce, there is no guarantee that new employment will actually be taken up locally. Regenerating or 'gentrifying' an area simply makes it too expensive for 'deprived' people. Designation of such areas may simply be a way to generate more developer profit, council tax, business rates or capital via asset sales at the expense of town cramming, or to overcome existing protections eg. major proposed commercial development in Crystal Palace Park.	Noted – added reference to government website on indices of deprivation. http://dclgapps.communities.gov.uk/imd/idmap.html
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	Croydon Council	Welcome the protection of the commercial properties along Church Road which accords with Croydon's wish to see a Crystal Palace Triangle with three active sides.	Support Welcomed – protection afforded by virtue of designation as a District Centre in the Local Plan (already designated in the London Plan)
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	Southwark Council	We support the promotion of Crystal Palace but emphasise the need for the five boroughs that will be directly affected by any future development at Crystal Palace Park to work together and in conjunction with the Mayor and explore the potential for a planning framework to ensure appropriate development, in accordance with the London Plan. Furthermore, due to the prospect of a major leisure/commercial development at Crystal Palace Park, it is our opinion that this matter should be specifically addressed through Bromley's new Local Plan, as noted in the supporting text for draft policy 5.15. This would ensure that the appropriateness of development, the	Support Welcomed – The major leisure/commercial development previously referred to is no longer being pursued. There will be cross borough work in relation to the SOLD centre designation and in the event of cross borough Neighbourhood Plan proposals.

		potential Metropolitan Open Land de-designation and its impact on neighbouring boroughs such as Southwark, including its impact on transport infrastructure, the retail hierarchy and the character of the area and its surroundings, may be assessed through the local plan process and at public examination.	
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	English Heritage	Crystal Palace Park is included on English Heritage’s Heritage at Risk register and encourage the Council to make heritage assets at risk a central concern for the plan. English Heritage will continue to take an active interest in the proposals outlined here for restoration of the park, a grade II* historic park and garden and note the proposals for future consultation on a potential scheme for a building to ‘match the spirit and form’ of the original Crystal Palace which we request that we are closely involved in. In this respect, part ii), as presently, drafted may be too open-ended. We suggest that this is amended as follows: ‘...maximise opportunities ... ii) presented by the enhancement of and development within Crystal Palace Park, consistent with its heritage values and significance, and the benefit of the wider area, and ..’	Noted – Amended as suggested
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	The Beckenham Society	Add another clause “ to preserve Anerley and Penge Libraries as a key focus for the enhancement of the cultural development and regeneration of those areas”	New replacement Library subsequently opened in Penge
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	The Beckenham Society	Seek the supporting text ensure that any major development in Crystal Palace Park contain the caveat that: Precautions will be taken to ensure that a developer’s seductive proposal is not just a ploy “Advancing the threshold of acceptability” to obtain later conversion to a wholly commercial/retail development, by pleading unviability of the original proposal. All development must also be tailored to the capacity of the existing highways system and ensure that open space is not lost to massive car parks.	Noted
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	1 individual	I strongly agree that an asset such as Crystal Palace should be renewed. The site of the old Palace is an eyesore and the redevelopment of the site to reinstate something in its original form should be actively encouraged. This should however be for all the community to use and use of the park by everyone, and not to be at the expense of parts of the park given over to the building of flats or other development.	Noted
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	SE London Green Chain Working Party	Suggest additional policy clause 4: Support the extension of the Green Chain and Green Chain Walk. Expand in supporting text. (wording supplied)	Green Chain / Green Chain Walk alterations to be considered under “Valued Environments”. Addition to the Renewal Areas policy not necessary.
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	Crystal Palace Triangle Planning Group	The Crystal Palace Triangle Planning Group agrees that the designation of Crystal Palace as a District Centre We would also note that the District Centre has a very large number of D1 community uses across the 3 boroughs . There needs to be a mix of uses which contribute to its vitality and viability and support renewal and regeneration. With this in mind, Bromley’s part of the District Centre along Church	Noted Continue cross borough work and work with the GLA. Policy refers to the potential to prepare development site briefs and other guidance.

		Road includes the *only* large D2 "Assembly & Leisure" use premises (the former Rialto cinema and Gala Bingo Hall at 25 Church Road) which has been registered as an Asset of Community value. This would fit with and support Croydon council's plan where it has identified Crystal Palace as an Enterprise Centre where it seeks to promote the growth and expansion of Cultural and Creative Industries. A cultural and leisure venue at this location would contribute to the economic, social, cultural and environmental regeneration of Church Road and the District Centre, improve the quality of life of its residents and support local businesses. It is important that Bromley works closely with Croydon and Lambeth councils to achieve the right mix of uses and takes a holistic view in developing this policy to support Croydon's vision for the area.	
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	Affinity Sutton	The ongoing success of regeneration in this area will be greatly influenced by the outcome of the Crystal Palace Park competition and the associated masterplan. Unlike earlier masterplans the current masterplan appears to be lacking affordable housing which is a missed opportunity. The success generated from the overground station indicative of the positive impact of integrated transport connections, and with this in mind we would be highly supportive of the extension of the Croydon tram-link (outlined in section 7.6 Safeguarding land for transport investment) to establish a much needed cross Borough route. This would help residents in their search for employment and other opportunities.	Noted
Policy 5.15 Renewal Areas – Crystal Palace, Penge and Anerley	1 individual	Objects to the proposed ZhongRong development on protected MOL and to this "skewed way-paving" policy. The reference to 'tram extension' as a benefit is an expensive false aspiration to an area already served by numerous buses. Tram tracks / girders / wires would erode the historic established green Anerley Hill park edge.	The specific development proposals are no longer being taken forward
Policy 5.16 Renewal Areas – Bromley Common	Orpington Field Club	The supporting text indicates that opportunities to cater for the growing population might include aspirations for a BMX track and an enhanced cycling provision in Norman Park - These very specific proposals for Norman Park must take account of the resulting pressure on SMI woodlands to north and south and the de-culverted River Ravensbourne flowing through the park which is important for wildlife. It is suggested that these very specific proposals could be removed from the text.	Noted – removed from text
Policy 5.16 Renewal Areas – Bromley Common	1 individual	This area should be subject to renewal but not at the expense of the greenbelt land. Whilst some of the area needs enhancing I would not want to see much further expansion of houses from Trinity Village. There is always the danger that schools would want to expand or Bromley College gaining university status and requiring further expansion or student village for accommodation. This would result in the semi-rural feel of this area being destroyed and Bromley Town Centre extending into Farnborough.	Educational Allocation on the southern half of the Turpington Lane Allotments site
Policy 5.16 Renewal Areas – Bromley Common	Bromley Biodiversity Partnership	The supporting text indicates that opportunities to cater for the growing population might include aspirations for a BMX track and an enhanced cycling provision in Norman Park - These very specific proposals for Norman Park must take account of the resulting pressure on SMI woodlands to north and south and the de-culverted River Ravensbourne flowing through the park which is important for wildlife. It is suggested that these very specific proposals could be removed from the text.	Noted – removed from text
Policy 5.17	Bexley Council	Will assist in ensuring aspirations align with the Sidcup Geographic region (Policy	Support Welcomed

Renewal Areas - Cray Valley		CS06) and with the Foots Cray Sustainable Growth Area and the Strategic Industrial Location as an Industrial Business Park	
Policy 5.17 Renewal Areas - Cray Valley	1 individual	Supports Orpington town centre being included in the Cray Valley Renewal Area as it is a Major Town Centre, as designated in this In particular I consider that the former police station site should be designated as a proposal site as having potential for a range of uses, but particularly for high density residential. a development brief scoping the nature and extent of development that the site could accommodate to give more certainty to potential developers. Whilst a planning permission exists for the cinema and retail complex, I consider this site should be designated as a proposal site for retail, restaurant, leisure and potentially also residential uses, in the event that the current proposals cannot attract sufficient pre-lets to proceed. I would also recommend that a review of vehicle usage of the two multi-storey car parks in the town centre (above the Walnuts and above Sainsbury's) is undertaken. If these are under used then they should also be designated as proposal sites and mixed use redevelopment encouraged, re-providing some car parking but also providing new residential above.	Support Welcomed Former Orpington Police Station granted permission for 83 flats and health centre Development briefs may come forward under the "Development affecting Renewal Areas policy"
Policy 5.17 Renewal Areas - Cray Valley	Cray Wanderers FC	Support the proposed Renewal Area and note the important if not crucial opportunity to give the area a community focus, afforded by the proposal to bring back the Cray Wanderers to the Cray Valley. They highlight Bexley's support and the need for cross borough working. They seek a commitment from the Council to assisting the club to return to their home catchment area and suggest adding a third clause to the policy "to assist in the homecoming of Cray Wanderers as a focus for a community based educational and recreational hub serving both Bromley and Bexley"	Support for Renewal Area welcomed Cray Wanderers are developing a new site outside the Cray Valley Renewal Area
Policy 5.17 Renewal Areas - Cray Valley	Cray Village Community Forum	Additional clause 5.17 iii) proposal which highlights the old High Streets as areas for the development and growth of smaller, more Artisan, non-chain businesses. The Local Plan should seek ways of: <ul style="list-style-type: none"> Integrating the old High streets with the Nugent and river through creative design, signposting, walkways, access and parking Fostering economic growth and sustainability by encouraging small start-up, pop up and craft businesses to occupy empty retail units rent free or at a community rent (this has been done successfully in the Mary Portas winning area of Forest Hill, Sydenham & Kirkdale) Removing planning obstacles to change of use and access for old character buildings eg: the Red Lion Pub, to encourage regeneration and investment from new businesses of value to the community (i.e.: nurseries not betting shops) Creating a cohesive vision which enhances and improves this whole area and marketing attractions to Bromley residents and visitors 	Noted – the Use Classes Order grants flexibilities Additional clause relating to the integration of the river Other matters potentially relevant to all renewal areas and facilitated through the general "Renewal Areas" policy Development briefs may come forward under the "Development affecting Renewal Areas policy"
Policy 5.17 Renewal Areas - Cray Valley	London Gypsy and Traveller Unit	Policy gives insufficient consideration to the needs of Gypsies and Travellers and other minority groups for housing and social infrastructure. Should include specific wording on how proposals in the Renewal Area will recognise and support the needs of Gypsies and Travellers and other equality groups, but also encourage the development of new sites given the expected investment in the area.	Travellers section of "Living in Bromley" addresses traveller matters and allocates sites to make appropriate provision

Policy 5.17 Renewal Areas - Cray Valley	Jones Lang LaSalle for Legal and General Assurance Society Limited	Supports the inclusion of the policy, identifying areas for renewal is in line with London Plan policies The Council should provide a flexible policy framework which will support Crayfields Business Park, providing additional land and allowing a variety of uses including employment generating floorspace, as well as other service functions such as crèche's or health facilities. Highlights the possibility of a more comprehensive review of Green Belt boundary in the area including a site for Cray Wanderers FC.	Support welcomed Cray Business Park allocated as an "Office Cluster". Sites assessed but no additional land released from Green Belt for employment purposes. Cray Wanderers are developing a new site outside the Cray Valley Renewal Area
Policy 5.17 Renewal Areas - Cray Valley	Porta Planning LLP for William Nash (Chalk Pit Lane)	We request that the Land off Chalk Pitt Avenue is included within the Cray Valley Renewal Area boundary for future development.	Site already lies within the Renewal Area Site Assessed and NOT recommended for release from Green Belt
Policy 5.17 Renewal Areas - Cray Valley	Orpington Field Club	Cray Valley Renewal area offers the opportunity to provide an improved green corridor for people and wildlife along the River Cray as per policy 5.13 i & ii. Care should be taken to avoid light pollution of the waterway because this has a negative impact on bat populations, particularly those species of bats present in the Borough which specialise in feeding over wetland habitat, such as Daubenton's bat.	Noted – added further clause making specific reference to wildlife along the River Cray environment
Policy 5.17 Renewal Areas - Cray Valley	Bromley Biodiversity Partnership	Cray Valley Renewal area offers the opportunity to provide an improved green corridor for people and wildlife along the River Cray as per policy 5.13 i & ii. Care should be taken to avoid light pollution of the waterway because this has a negative impact on bat populations, particularly those species of bats present in the Borough which specialise in feeding over wetland habitat, such as Daubenton's bat.	

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

SUPPORTING COMMUNITIES

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Supporting Communities – General (minus Education)

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
Vision	The Chislehurst Society	There is no explicit mention of the importance of education as part of the vision, either in terms of provision, or the benefits of a effective education.	Noted – high educational; attainment is recognised in the Vision.
Vision and Objectives	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	The Plan refers to the JSNA, Joint Health and Wellbeing Strategy and the Pro-Active Bromley Strategy Framework but there is no summary of the health issues and challenges facing the borough and the implications for spatial planning. The vision refers to 'living healthy', but this is not defined. no reference to NHS commissioning strategies. The Clinical Commissioning Group (CCG) is currently drafting its Integrated Commissioning Plan 2014–2019 and a Strategic Planning Group comprising the six CCGs in South East London is preparing a South East London Five Year Commissioning Strategy - suggest that there is reference to the strategies and description of the wider determinants of health on page 69.	Noted – Further work undertaken with Bromley's Healthy Weight Forum and endorsed by the Health and Wellbeing Board to ensure appropriate inclusion and referencing of health matters.
Objectives - Health & Wellbeing	Simply Planning on behalf of KICC The Open Door (KICC)	A place of worship in a town centre is wholly consistent with the objective to "ensure new community facilities are appropriately located to provide accessible, effective and modern services, and resist the net loss of facilities."	Noted
Objectives - Health & Wellbeing.	Orpington Field Club	suggest insert to supporting text to read, "Communities are served by local shopping parades, education, healthcare, leisure, community, <u>good quality greenspace</u> and cultural facilities, including libraries and places of worship"	Noted –amendment made to reference green space
6 Supporting Communities	West and Ptns for Relta Ltd	Support	Support welcomed
6 Supporting Communities	Sport England	welcomes the reference to sports facilities within this section. Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' should be taken into account. The statement details Sport England's three objectives in its involvement in planning matters; 1) resisting loss of facilities and land 2) ensuring best use of existing facilities 3) ensuring new facilities to meet current and future demands for sporting participation.	Support welcomed and Policy Statement noted, incorporated ref to Sport England's guidance
6 Supporting Communities	1 individual	Beckenham in particular suffers from a shortage of schools. New housing development have been built without plans to increase school places. This was done later on a reactionary basis. Land which could have been used for a new school (eg the sports ground on kings hall road) was instead used for housing. This needs serious consideration whenever housing is approved.	Noted – the pressure for places is acknowledged in the education policies and the appropriateness of sites for schools has been considered through the Site Allocation process
Policy 6.1 Community Facilities	Croydon Council	Suggest extending to 18 months the period of consulting the Council and third party providers and marketing for an appropriate viable community use. In Croydons experience this length of time is required – happy to share experience.	Noted. Considered but not accepted
Policy 6.1 Community	Pellings on behalf of Bromley College of	Support	Support welcomed

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
Facilities	Further and Higher Education		
Policy 6.1 Community Facilities	Theatres Trust	support the document for its cultural content and the policy which recognises that cultural venues and activities are important for people's health and well-being.	Support welcomed
Policy 6.1 Community Facilities	Crystal Palace Triangle Planning Group	We broadly welcome policies which focus on retaining community/leisure facilities with a focus on existing facilities and open non discriminatory access and we would note the Equalities Act 2010. Your introductory text differentiates between community and leisure facilities under para 2 - Social infrastructure. Yet then goes on to lump a variety of uses including leisure uses under the one policy 'Community Facilities'. That is a contradiction. The London Plan recognises that there is a difference hence Policy 4.6 which you refer to in the supporting text. This should be recognised in your plan making process and policies. The change of use of an entertainment /leisure/cultural use falling under the D2 planning use to a D1 use should not be permitted unless there is evidence that there is no longer a need for a D2 use within a town centre. With regard to Assets of Community Value, the Localism Act is clear that where an asset is nominated this should be a material planning consideration when considering a change of use. Accordingly there should be a distinction between D2 and D1 planning uses reflected in the policy.	Support welcomed Amendment to clarify that where the proposal involves a change of use the applicant will first need to demonstrate the lack of need for the specific use class.
Policy 6.1 Community Facilities	NHS Property Services Ltd	The disposal of surplus sites is important in funding new or improved facilities. Restrictive policies, especially those which seek to require substantial periods of marketing, could delay required investment in alternative facilities. There is rigorous testing to identify surplus health facilities by healthcare organisations (NHS England, CCG's) and it should not therefore be necessary to undertake the marketing of a before the local planning authority is able to favourably consider alternative uses or redevelopment.	Noted – however, the policy allows redevelopment where alternative enhanced provision is made in an equally accessible location. The health sector benefits from the policy requirement, negotiating new health provision on the sites of redundant social infrastructure.
Policy 6.1 Community Facilities	Cray Wanderers	Support the policy but suggest that the compliance with the Football Club proposals is compliant with National, Regional and local policy and that this should be recognised with an explicit reference to the Football Club.	Support welcomed. Sports facilities are referred to but an explicit reference to individual facilities is not appropriate within the policy
Policy 6.1 Community Facilities	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	We strongly support the reference to Lifetime Neighbourhoods. Policy should refer more to services whereby premises and other infrastructure supports the delivery of services.	Support welcomed The policy cannot dictate the nature of service delivery but can ensure appropriate infrastructure to facilitate its provision.
Policy 6.1 Community Facilities	Lidl (Walsingham Planning)	Supporting text is clear that policy 6.1 applies to public houses hence Policy 6.7 is duplication policy too restrictive requiring consideration of need for other forms of social infrastructure. Redraft last para "to reflect assets of community value" regulations	Given the significant numbers of public houses being lost and the evolving regional and national guidance a specific policy is appropriate. Redrafted the last para to reflect the suggested

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
			changes to the draft London Plan (published July 2014) clarifying that evidence of “community asset value” include being asset listed as an Asset of Community Value under the Localism Act 2011 (160A). However, this is not an exclusive route.
Policy 6.1 Community Facilities	Campaign for Real Ale (CAMRA) Bromley Branch	<p>We support Policy 6.1, and its provisions to prevent the loss of such facilities (including Public Houses) unless it can be demonstrated that there is no longer a need for them or suitable enhanced provision is made.</p> <p>We also support the final paragraph whereby facilities identified by local communities as having significant value will be protected unless it can be demonstrated that no prospective purchasers exist that would be willing to pay both a suitable price and maintain the existing use. This is an important matter of principle. It recognises the danger that such facilities will be removed for reasons other than lack of public demand or commercial viability. The consultation document recognises that the closure of a public house may come as a surprise to local communities and that, in some cases, there may not be time to nominate a pub as an ACV before its sale and/or the submission of a planning application. It is important that Policy 6.1 should apply to all pubs, not just those listed or nominated as ACVs.</p> <p>It would be helpful if the Council made clear that sale, closure or the owners' claim of non viability would not prevent ACV listing and that it would be sufficient for the nominating group simply to demonstrate an actual or potential social role and community support.</p>	<p>Support Welcomed</p> <p>Noted – Redrafted the last para to reflect the suggested changes to the draft London Plan (published July 2014) clarifying that evidence of “community asset value” include being asset listed as an Asset of Community Value under the Localism Act 2011 (160A). However, this is not an exclusive route.</p>
Policy 6.1 Community Facilities	The JTS Partnership for The Roman Catholic Diocese of Southwark	<p>The exceptions outlined in the policy and supporting text do not go far enough. Where such a need is in a location different to that where the existing (redundant) provision is made, the opportunity exists to secure the proceeds of the disposal of the existing site to meet other identified social infrastructure needs elsewhere.</p> <p>Suggests amendment of the third paragraph: “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, <u>or where it can be shown that the proceeds through disposal can be secured for the provision or enhancement of other social infrastructure.</u>”</p>	The policy allows redevelopment where alternative enhanced provision is made in an equally accessible location. However, where there is a need for educational sites the loss of existing sites would not be justifiable.
Policy 6.1 Community Facilities	West and Ptns for Relta Ltd	Support	Support Welcomed
Policy 6.1 Community	Simply Planning on behalf of KICC The Open Door	Generally agrees with the draft policy Clarification is, however, sought on paragraph 3 of proposed policy 6.1. which	Reintroduced the paragraph from the adopted UDP supporting text indicating that “The

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
Facilities	(KICC)	we suggest too prescriptive in that it fails to recognise the multi-use of premises and the ability of such proposals to ensure the maximum potential for future use of important buildings within the Borough. This is particularly the case where it can be demonstrated that there is no longer a demand for the continued leisure use of a particular building.	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”
Policy 6.1 Community Facilities	Simply Planning on behalf of KICC The Open Door (KICC)	<p>Object in the strongest possible terms to the final paragraph of the policy which, in respect of facilities identified by local communities as having significant value, indicates that 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. The draft supporting text confirms that this will need to be demonstrated through the submission of a six month marketing exercise with any planning application.</p> <p>This policy goes far beyond the limitations placed upon the operation of the Assets of Community Value Scheme as provided through the Localism Act (2011) and Assets of Community Value (England) Regulations 2012. There is no obligation on the owner to sell or to give the community group a right of first refusal. In this first instance we have concerns with regards to how a ‘suitable price’ is defined. This requires clarification. Also it does not distinguish between appropriate planning applications (i.e. mixed use schemes retaining an element of community uses could be acceptable). It also fails to recognise incidents where the previous use of a building is unviable and that new schemes (including co-location of facilities and mixed use schemes) may be of equal if not increased benefit to the local community. As drafted, the policy is far too prohibitive.</p>	Where a change of use is required between use classes an amendment is proposed to require a 6 month marketing period
Policy 6.1 Community Facilities	Bloomfields on behalf of Mr. Adrian Pollock, (Flamingo Park, Sidcup)	Policy is welcomed but can best be achieved through allocating land for development. Failure to assess and provide for its housing requirements, will result in the Council being unable to provide the community facilities that its current and future residents need and deserve.	Noted
Policy 6.2 Opportunities for Community Facilities	Affinity Sutton	<p>Support the aim to establish community facilities and encourage the creation of social infrastructure. Affinity Sutton is committed to the process of transferring our community assets into local ownership along with a dedicated package of support to ensure sustainable community ownership in the long-run. extremely successful examples are being implemented at Turpington Lane (Bromley Common), St Hugh’s (Anerley), and Geffreys (Mottingham). We have also recently completed a research project that devised a toolkit to enable Housing Providers and other social enterprises to measure the social value created by the community focused projects that they provide. http://www.hact.org.uk/measuring-social-impact-community-investment-guide-using-wellbeing-valuation-approach</p>	Noted and support welcomed
Policy 6.2 Opportunities	Pellings on behalf of Bromley College of	Support	Support welcomed

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
for Community Facilities	Further and Higher Education		
Policy 6.2 Opportunities for Community Facilities	Cray Wanderers FC	Support the policy and note the important if not crucial opportunity to give the Cray Valley Renewal Area a community focus. Seek specific reference to this opportunity within the plan	Support welcomed. Cray Wanderers are seeking to locate outside the Renewal Area
Policy 6.2 Opportunities for Community Facilities	Simply Planning on behalf of KICC The Open Door (KICC)	Support the principles of policy 6.2 and in particular enabling community uses in town and district shopping frontages. And the active encouragement of the development of community "hubs" which they feel their clients proposals deliver.	Support welcomed
Policy 6.2 Opportunities for Community Facilities	Campaign for Real Ale (CAMRA) Bromley Branch	Support the policy. Suggest the supporting text note that public houses are appropriate community facilities in the context of this policy and they draw attention to a growing trend for 'micro pubs' in commercial areas. These are small-scale independent businesses that serve a variety of often local beers and ciders. They typically have no music, TV or gaming machines; the emphasis is on conversation and sociability. They add choice and variety for the discerning pub-goer and help to counter the overall trend of pub closures. We urge the Council to support such enterprises.	The supporting text already references bars (London Plan policy 4.6) and public houses (NPPF). Reference to micro pubs made within the supporting text of the draft public houses policy 6.7. enabling them to use existing public houses. Clarifying in the supporting text that where they set up in other commercial buildings or retail units it would be onerous to prevent their return to the former use should the micro pub use cease.
Policy 6.2 Opportunities for Community Facilities	West and Ptns for Relta Ltd	Support	Support Welcomed
Policy 6.2 Opportunities for Community Facilities	Bloomfields on behalf of Mr. Adrian Pollock, (Flamingo Park, Sidcup)	Policy is welcomed and the Council is urged to properly identify and plan for its housing requirements. In doing so, it will be able to obtain community facilities as part of the overall development packages provided by house builders and developers.	Noted
Policy 6.3 Social Infrastructure in New Developments	NHS Property Services Ltd	Supports the requirement for developer contributions to provide both on and off-site contribution to social infrastructure to mitigate the impacts of planned growth on existing facilities in the area.	Noted - draft policy 11.1 "Delivery and implementation of the Local Plan" covers planning obligations
Policy 6.3 Social Infrastructure in New Developments	West and Ptns for Relta Ltd	Support	Support Welcomed
Policy 6.4 Health and Wellbeing	NHS Property Services Ltd	Welcomes the councils approach to proactively work with relevant health bodies in planning for future healthcare request that this policy is linked to policy 6.3 and specific mention is made with regards to ensuring that section 106/CIL funding is sought to mitigate the	Noted – included additional cross reference in the supporting text.

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
		impact of the proposed levels of growth in the area and meet identified shortfalls and requirements for service provision within the local area.	
Policy 6.4 Health and Wellbeing	SE London Green Chain Working Party	Suggest more explicit link in terms of the role of green space and exercise mental health. Suggest citing MIND's report " Ecotherapy- the green agenda for mental health " 2007	Supporting text expanded.
Policy 6.4 Health and Wellbeing	Healthy Urban Development Unit (HUDU) for NHS Bromley Clinical Commissioning Group (CCG)	Policy is strongly supported. The use of HUDU's Watch out for Health should be clarified – is it a requirement or a suggestion? Under criterion ii, it might be the case that public transport access to new health facilities needs to be improved and sustained. There is no description or map of current health services or facilities and no assessment of future requirements in the renewal areas and town and district centres. We suggest that this information is provided as part of the Infrastructure Delivery Plan. Suggest that the concept of Lifetime Neighbourhoods, as a cross-cutting theme, is referred to.	Support welcomed "Watch out for Health" it is not a requirement but assists in the assessment of development proposals Reference added to highlight that it can be used to demonstrate contribution to Lifetime Neighbourhoods in the supporting text and in other related Policies inc Policy 5.3 Housing Design. Existing facilities and need set out in the Infrastructure Delivery Plan.
Policy 6.7 Public Houses	Lidl (Walsingham Planning)	Definition of community facilities should include public houses therefore separate Public House policy unnecessary.	Given the significant numbers of public houses being lost and the evolving regional and national guidance a specific policy is appropriate.
Policy 6.7 Public Houses	Lidl (Walsingham Planning)	Criteria 1 whilst appreciating the objective of the 500m it is an entirely arbitrary distance. They question whether this is the most appropriate benchmark & would like to see the evidence base that underpins it.	500m distance justified in the Public House Evidence Base,
Policy 6.7 Public Houses	Lidl (Walsingham Planning)	"town centres" – Need clarity re other designated centres (such as neighbourhood centres, local centres or district centres) and how to measure whether the 'diverse offer' of a centre has been 'significantly affected by the loss'.	Amended text to clarify all centres
Policy 6.7 Public Houses	Lidl (Walsingham Planning)	Criteria 2 – not clear why 18 months' marketing activity is required to justify the loss of a public house, when a 6 months is required under Policy 6.1 for other community facilities.	Public Houses are business activities – 6 months reflects the requirement for employment uses in draft policy 9.4
Policy 6.7 Public Houses	Campaign for Real Ale (CAMRA) Bromley Branch	Strongly support a robust policy to protect public houses Suggest changes to improve the clarity and effectiveness of this policy, deleting the reference to 500m and replacing it with three tests (1) There is no significant local support for the retention of the public house; (2) There are alternative licensed premises, within easy walking distance of the public house, that offer similar facilities and a similar community environment to the public house which is the subject of the application; (3) If the public house is located within a local parade or town centre, the diverse offer of that parade or town centre is not significantly affected by the loss;	Support welcomed. 500m distance justified in the Public House Evidence Base. The type of environment within any given pub can be subject to change and is outside planning control.
Policy 6.7	Campaign for Real Ale	We support the financial viability test - Eighteen months is a reasonable	Support welcomed.

Objective / Policy/ issue	Respondent	Summary of issues	Officer comment
Public Houses	(CAMRA) Bromley Branch	period of time to assess market demand, subject to the pub having been actively marketed during this period at a price reflecting the existing use value offered for sale free of tie and restrictive covenant. Recommend an independent professional valuation and commend to the Council CAMRA's Public House Viability Test, which sets out a range of matters that should be taken into consideration.	Reference added to the CAMRA viability test as a useful tool (but not a requirement) in the supporting text and expand / clarify further the nature of viability evidence requirements
Policy 6.7 Public Houses	Campaign for Real Ale (CAMRA) Bromley Branch	We reiterate the need for the Council to allow time for the community to lodge a proposal for ACV listing and to treat any such application sympathetically. The Council should issue an appropriate Article 4 Direction to prevent demolition without specific consent if it becomes aware that a pub is threatened in this way.	The Council has to deal with planning applications in a timely manner and cannot delay for possible ACV listing. However, community value can be demonstrated in alternative ways. The Council uses Article 4 directions where appropriate. There are no current plans for wide application of Article 4 directions to protect public houses.
Policy 6.7 Public Houses	Campaign for Real Ale (CAMRA) Bromley Branch	The estimate of at least 15 pubs lost since 2000 is a significant underestimate. Our provisional research has identified at least 39 pubs that have closed since 2000	Public House evidence base has updated the information – amend supporting text to reflect new data.
Policy 6.8 Allotments and Leisure Gardens	1 individual	Any development on allotments should be resisted on these sites that provided health and well being, as there is no likelihood that alternative provision could be made elsewhere.	Noted
Policy 6.8 Allotments and Leisure Gardens	1 individual	This is too woolly and open to interpretation. Will the Council be exploring opportunities to develop allotments or to find new ones? The policy should protect allotments given the waiting lists and London's increasing population. Re word suggested. <u>'The Council values allotments as green open space and as valued community amenities and will oppose development on them'.</u>	The policy safeguards land in use as allotments and will explore opportunities for new allotments. The policy has been amended to clarify.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Supporting Communities – Sites assessed and proposed for education

Site: Bromley Education Trust (BET) site, Bromley Common

Current Proposal: Redesignate this Green Belt fringe site from Green Belt to Urban Open Space and allocate for additional primary or secondary school during the local plan period.

16 responses were received – 1 letter, 1 email, 14 responses online (of which 3 left no comments)

Respondent	Summary of issues	Officer comment
1 individual; Bromley Common Action Group	Impact on biodiversity <ul style="list-style-type: none"> • Badger sets present • Wildlife occupy the area 	The site is not covered by a wildlife designation however, under emerging policy 8.5 protective and active management of a site will be sought if as part of a proposal the nature conservation interest of the site becomes evident. Badgers and the setts (burrows) they live in are protected under separate legislation (the Protection of Badgers Act 1992. Any proposal would be required to comply with this legislation.
2 individuals; Bromley Common Action Group	Impact on enjoyment of the area <ul style="list-style-type: none"> • Development would impact upon the amenity of Hayes Lane and Bromley Common residents • People enjoy open areas • A local children's football group use the area • Childrens' health and physical/scientific education is adversely affected by development 	There are currently single storey classroom blocks on the site. In addition to emerging policy 8.1 General Design of Development (which relates to respecting the amenity of the occupiers of neighbouring buildings) any new build proposal will need to be sensitively sited to minimise the impact on the open nature of the site (emerging Policy.8.20) . The provision of appropriate education infrastructure supports children's health and education The use of the site by the community (e.g. local football club) could form part of the proposals for a new school.
7 individuals; Bromley Common Action Group	Impact on character <ul style="list-style-type: none"> • Development would be visually intrusive on the Green Belt land • Green space should be retained • It is within a short distance from other schools • Local fields (Trinity Village) have recently been lost to development 	As above, the Urban Open Space designation will seek to minimise the impact on the open space. The visual impact of a school development will need to be addressed through the detail of a planning application. There is a requirement for a location in the vicinity of Bromley Town Centre for a school currently in temporary accommodation. The Trinity Village development was allowed on appeal due to a lack of allocated sites to meet the Council's development needs.
1 individual	Traffic implications <ul style="list-style-type: none"> • Hayes Lane is already very congested in both directions during peak hours • The increase of traffic associated with the expansion of educational facilities would be dangerous 	Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "good" for an additional school, subject to the detail of a planning application, which will be required to address access / highways issues and minimise / mitigate impacts as appropriate.
1 individual	Future Development <ul style="list-style-type: none"> • Land is likely to be developed into housing at a later date 	Under emerging policy 6.5 this existing education site will be designated as "Education Land" and safeguarded for the plan period. The land will be redesignated as Urban Open Space, which specifically resists residential development. There is no allocation other than for

		educational development.
4 individuals; Bromley Common Action Group	<p>Alternative sites</p> <ul style="list-style-type: none"> • The Draft Allocations/Designations document demonstrates that there are more appropriate sites available. • The Gas Holder Station would be a more appropriate site • Why can't a new school build on the former sites of recently closed schools? • Development should prioritise brownfield land • No alternative sites explored 	<p>The Education Background Paper sets out the evidence base and assesses potential sites. The enhancement of provision on existing education sites limits the need to seek wholly new sites on open space. However, even with the selective expansion of existing education sites the Council has found it necessary to allocate further designated open spaces. The Background Paper sets out the assessment methodology used to explore all potential sites, including recently closed schools. The 1.5ha Gas Holder Station site was submitted by the landowner for residential development. It has been assessed and recommended for a residential led mixed use development with 60 residential units anticipated (forming part of the Councils 5 year housing supply.) Subject to the delivery of the necessary residential units the mixed use allocation could include education provision.</p>
1 individual; Bromley Common Action Group	<p>Existing infrastructure limitations</p> <ul style="list-style-type: none"> • Access to the site is poor 	<p>Whilst the site does not present problems in respect of the road capacity and public transport the vehicular access onto the site will need to be satisfactorily addressed as part of any planning application.</p>
3 individuals; Bromley Common Action Group	<p>Legal matters</p> <ul style="list-style-type: none"> • The proposal does not demonstrate the very special circumstances that justify the redesignation of Green Belt land. • No justification given for universalised de-designation over a Green Belt review. 	<p>In respect of Green Belt the Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the "exceptional circumstances" which justify specific alterations to the Green Belt boundary through Local Plan review in line with the NPPF section 9.</p> <p>The Council is not proposing a full scale Green Belt Review, however, to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education) it has been necessary, in the absence of alternatives, to assess sites including existing Green Belt / Metropolitan Open Land school sites.</p>

Site: Castlecombe Primary School, Mottingham

Current Proposal: Redesignate this Metropolitan Open land (MOL) fringe site from MOL to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period

8 responses were received – 1 letter, 7 responses online (of which two approved of the proposals without commenting)

Respondent	Summary of issues	Officer comment
The Woodland Trust	Impact on biodiversity <ul style="list-style-type: none"> Ancient woodland, trees and their wildlife should be preserved 	<p>The boundary has been reassessed to minimise the land to be taken out of MOL whilst making appropriate allowance for expansion.</p> <p>The area to be redesignated to Urban Open Space (UOS) does not include any area of ancient woodland. Any adverse impact on woodland to be assessed and resisted at planning application stage.</p>
2 individuals	Impact on enjoyment of the area <ul style="list-style-type: none"> New development takes away green areas for children to play in Noise and light pollution will affect local residents 	<p>The provision of appropriate education infrastructure supports children's health and education.</p> <p>Whilst the emerging Urban Open Space policy 8.20, enables educational development it requires sensitive siting to limit the impact on the open nature of the site.</p> <p>A planning application would need to take account of existing or emerging design policies relating to the amenity of neighbouring properties.</p>
2 individuals	Impact on character <ul style="list-style-type: none"> Previous development not in keeping with the school building and so future development is likely to be an eyesore Green space should be preserved 	<p>The design of any future educational development will be subject to full planning application processes and policies relating to design. The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The Education Background Paper sets out the evidence base and assesses potential sites.</p>
2 individuals	Traffic implications <ul style="list-style-type: none"> School is not near public transport infrastructure and so expansion likely to have traffic implications Local roads (Imperial Way) are already at capacity 	<p>Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "acceptable" for educational expansion. Any proposal would be subject to a planning applications which will be required to address highways and access arrangements and mitigate adverse effects.</p>
1 individual	Alternative sites <ul style="list-style-type: none"> No alternatives sites have been identified 	<p>The Education Background Paper sets out the evidence base and assesses potential sites. The enhancement of provision on existing education sites limits the need to seek wholly new sites on open space. However, even with the selective expansion of existing education sites the Council has found it necessary to allocate further designated open spaces. The Background Paper sets out the assessment methodology used to explore all potential sites,</p>
1 individual	Future development	Changes to MOL can only be made through the Local Plan process

	<ul style="list-style-type: none"> An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	<p>and would therefore only be reviewed at that time. The proposed redesignation to Urban Open Space and importantly the “Education Land” designation ensure that the impact on the open space is limited and that the land is safeguarded for educational purposes.</p>
3 individuals	<p>Legal matters</p> <ul style="list-style-type: none"> NPPF para.118 – Planning permission should be refused for development resulting in the loss of deterioration of irreplaceable habitats Natural England para 6.4 – “Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary” The proposal does not demonstrate the very special circumstances that justify the redesignation of Green Belt land. No justification is given for universal de-designation rather than the normal approach of a Green Belt review 	<p>Under the emerging UOS policy any development is required to limit the impact on the open nature of the site. Similarly its Green Chain designation requires development proposals to respect and not harm the character or function of the Green Chain (emerging policy 8.19). These requirements would not encourage development to the south of the site (close to the SINC and ancient woodland). Furthermore, the adopted and emerging Local Plan policies ensure that any impact on habitats would be assessed and minimised / mitigated as appropriate at planning application stage.</p> <p>In respect of Green Belt the Council’s statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the “exceptional circumstances” which justify specific alterations to the Green Belt boundary through Local Plan review in line with the NPPF section 9.</p> <p>The Council is not proposing a full scale Green Belt Review, rather, to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education) it has considered all the existing Green Belt / Metropolitan Open Land school sites.</p> <p>The boundary has been reassessed to minimise the land to be taken out of MOL whilst making appropriate allowance for expansion.</p>

Site: Former Co-operative Sports Ground, Balmoral Avenue, Beckenham

Current Proposal: Re-allocate privately owned Urban Open Space land for additional secondary school (The Beckenham Academy)

138 responses were received – 2 letters, 97 emails, 39 responses online

Respondent	Summary of issues	Officer comment
92 individuals	General support for proposed reallocation for education use	Support noted, however the site is no longer proposed to be allocated for education and there is a current live application on the site.
37 individuals	<p>Traffic congestion issues:</p> <ul style="list-style-type: none"> • Upper Elmers End Rd and Balmoral Ave already strained under current through traffic volumes, due to residential, local business and rugby club uses. • Intersections with Balmoral Ave, Upper Elmers End Rd and Eden Park Rd already suffer large queuing • Balmoral Ave is a narrow road with off street parking on both sides. Ability to pass opposite traffic is limited without using empty parking spaces • Balmoral Ave is the sole access point for a high number of residences including a block of flats close to the site. • Access to site is limited and Upper Elmers End Rd and Stanhope Grove Rd are unsuitable for access, thereby adding to pressure along main frontage of Balmoral Ave • Balmoral Ave used as a 'rat run' to circumvent Elmers End Rd roundabout • Often used as a detour when works or accidents occur on nearby routes • Close proximity to Marian Vian Primary School will add to congestion at peak times • Langley Park Schools traffic already causes congestion on Upper Elmers End Rd • Entering and exiting Osbourne Cl opposite the site will become hazardous with school traffic • Weekend use of road network is strained by rugby club events. Potential weekend use of school facilities will add to this off peak congestion • Safety issue: variety of vehicle types use surrounding road network and several accidents have already occurred in vicinity of site. • Visitors to new school will mostly arrive by private vehicle rather than using public transport • Construction of new school will create a burden for residents who rely on Balmoral Ave for access 	There is a current live planning application. Detailed traffic and transport analysis will be undertaken as part of the determination of the application.
19 individuals	<p>Vehicle parking issues:</p> <ul style="list-style-type: none"> • Residents rely on on-street parking capacity • This is reduced by use of on street spaces by visitors to Marian Vial Primary School, commuters at Elmers End station and rugby club patrons • Concerned that the site will lack sufficient off-street parking for school visitors 	Expected travel behaviours of visitors to the proposed new education use, and resulting car parking requirements, will be a consideration as part of the traffic and transport analysis of the current planning application.
3 individuals	<p>Public transport issues:</p> <ul style="list-style-type: none"> • Nearby rail connections and 194, 358 and 356 buses are already straining at peak hour. Abbots Way bus stop often cannot allow additional passengers on 	Expected travel behaviours of visitors to the proposed new education use, and resulting car parking requirements, will be a consideration as part of the traffic and transport analysis of the current planning

	already full buses. Commuters also need to cross several busy roads to access public transport	application.
16 individuals	<p>Amenity issues:</p> <ul style="list-style-type: none"> • Additional noise created by students, traffic and construction at new school • Additional fumes created by school related traffic • Removal of urban open space land will cause vermin problems for surrounding residents • Litter issue created by foot traffic from nearby schools such as Bullers Wood Girls School • Light pollution already created by rugby club will be exacerbated by evening events at new school 	Amenity impacts associated with the proposed new education use will be assessed through the current planning application.
20 individuals	<p>Loss of urban open space:</p> <ul style="list-style-type: none"> • Reallocation would be inconsistent with National Planning Policy Framework (NPPF) paragraphs 73 and 74. The open space is of longstanding nature and part of green space which is beneficial to the local area. • Reallocation would be inconsistent with NPPF aims to conserve environment and biodiversity (paragraphs 109, 118). The site is known to contain a number of valuable flora and fauna species. • Past surveys have found mature oak trees, rare birds of prey, badgers and butterflies. • Reallocation would be inconsistent with NPPF aims to allocate land with least environmental value (paragraph 110). • Reallocation would be inconsistent with NPPF aims to use previously developed sites rather than greenfield sites (para 111): There are current brownfield sites being redeveloped at Burroughs Wellcome site adjacent to South Eden Park Rd, which would appear more suitable. • Site should be preserved for recreational purposes to promote healthy living. • Reallocation would result in a loss of publicly accessible open space. 	There is a current application for a secondary school on the site.
5 individuals	<p>Drainage issues:</p> <ul style="list-style-type: none"> • Risk of local drainage problems caused by new school use. Query sensibility of locating new school in low and medium risk flood plain. 	Parts of the subject land are located in Flood Zones 2 and 3. This in itself would not prevent development, subject to compliance with the requirements for development in these zones.
11 individuals	<p>Question the need for a school in locality:</p> <ul style="list-style-type: none"> • Harris Academy and Langley Park schools are in close proximity. Clustering of schools is poor use of public funds • There is a greater need for a new secondary school in other localities such as Penge or Clock House. 	The Education Local Plan Background Paper, based on the Council's strategic documents Primary School Development Plan and "Planning of Secondary School Places", sets out the need for additional school capacity across the north west of the Borough.
17 individuals	<p>Suitability of site for school use:</p> <ul style="list-style-type: none"> • Question suitability of land against benchmarks to accommodate secondary school with 6FE • Residential interfaces mean capacity of land is reduced, as school buildings will need to be set back from plot boundaries • Site appears unlikely to provide adequate recreational space for a secondary school. • Multi-storey buildings will be out of character with neighbourhood built form 	<p>The Education Local Plan Background Paper identifies spatial requirements for school types and ranks candidate sites according to these requirements.</p> <p>There is a current application for a secondary school on the site which will be judged on its merits.</p> <p>The Emerging Local Plan package has not considered sites with open</p>

	<p>and create overshadowing for adjacent residents</p> <ul style="list-style-type: none"> • Alternative sites appropriate for development of tall school buildings should be sought • Predominantly residential character of neighbourhood should be preserved • Vistas that contribute to neighbourhood character would be disrupted • Previous study referred to site as “being remote” • Large number of secondary school students in very close proximity creates intimidating environment for existing primary school students • Site would be better utilised by another land use. Examples given include housing, educational resource for existing schools and a community resource such as a city farm. • Understood that weight may be given to proposals involving a free school that has been operating from a temporary site for a year. However the Beckenham Academy has not begun operating. 	<p>space designations for residential purposes. These documents propose reallocation as the site would be more appropriately utilised by addressing the established urgent need for additional school capacity in the local area.</p>
1 individual	<p>Methodology application:</p> <ul style="list-style-type: none"> • No justification is given for a universalised reallocation, rather than a Green Belt Review. Should instead be a site-by-site Green Belt Review to assess in each case presence of actual and long-term very exceptional circumstances. 	<p>The site is Urban Open Space. The Council is not proposing a full scale Green Belt Review,</p>
1 individual	<p>Does the assessment of need for secondary school space take into account availability of places in schools over the council boundary, such as Edenham High School in Croydon?</p>	<p>The proposed allocations in the DAFPD document are based on the Local Plan Background Paper for Education, which sets out the projected needs in the Bromley Borough. Similarly, Croydon Borough is undertaking a consultation to meet its projected education needs.</p>
1 individual	<p>There should be particular safeguards in place that any currently perceived need for school places does not represent a temporary demographic hump (measured on a timescale of decades not years) and that any duly agreed change of use has safeguards that returns the land to its earlier use, should the school use be no longer required at a future time.</p>	<p>The Local Plan seeks to make provision for a 15 year period. Any land allocated for education use in the Local Plan is safeguarded for that purpose only.</p>
Beckenham Rugby Club	<p>Please include stakeholder groups in further consultations on the future of the site (including Beckenham Rugby Club)</p>	<p>There is a live planning application to which community and other stakeholder groups including the Beckenham Rugby Club, have the opportunities to respond.</p>
3 individuals	<p>Need clarification about upcoming steps in planning process and opportunities for further comment</p>	<p>There is a live planning application. The Council has undertaken consultation in accordance with usual practise and the applicants have undertaken their own local consultation.</p>
Beckenham Rugby Football Club	<p>Will there be opportunities to purchase land for recreational facilities such as new pitches?</p>	<p>The Education Funding Agency has purchased the subject land for education purposes. The Council cannot comment on whether there will be opportunities for to purchase land for recreational facilities.</p>
6 individuals	<p>Description of site:</p> <ul style="list-style-type: none"> • Lack of address or map to describe site in draft consultation document is problematic. Unclear whether the “Former Co-op Sports Ground” land description includes the former bowling club • Use of term “education” is vague and does not adequately describe scale and intensity of proposed land use • Further detail on potential land use, including siting of buildings, is needed for residents to make an informed view in support or objection of reallocation 	<p>The subject land includes the former bowling green.</p> <p>The DAFPD document indicated allocation is for an additional secondary school. There is a live application which includes details of the nature of the proposal.</p> <p>The proposed reallocation of the plot to the north west of the site (“Mountbatten Gardens”) from Urban Open Space to None, in order to</p>

	<ul style="list-style-type: none"> The details provided are unclear as to the future use of surrounding land. E.g. the block of flats are shaded in the plan diagram provided. 	reflect the already established residential nature of this land.
7 individuals	<p>Process / Methodology suggestions (Traffic and Transport):</p> <ul style="list-style-type: none"> Have traffic studies been prepared in relation to the proposed reallocation? Suggest introducing permit parking to allow priority for spaces to local residents Suggest allowing off street parking at front of properties for adjacent residents as garages at rear are often too small for modern cars Suggest reopening the public footpath running along railway line parallel to Lloyd's Way Suggest stringent conditions for vehicular access to the school Will traffic studies be made available to public? Marian Vian Primary School is proposed to increase from 3FE to 4FE. Will this increase be accounted for in traffic studies? 	There is a live planning application providing detail on highways matters which will be considered through the planning application process.
1 individual	<p>Process / Methodology suggestions (Site Design):</p> <ul style="list-style-type: none"> Design should preserve mature lime trees as a buffer between school and residential uses 	Consideration of these matters will take place through the assessment of the current live planning application.
2 individuals	<p>Process / Methodology suggestions (Amenity):</p> <ul style="list-style-type: none"> Have studies been prepared on air, light and noise pollution impacts in relation to the proposed reallocation? 	

Site: Langley Park School for Boys and Langley Park School for Girls

Current Proposal: Redesignation of the two schools complex from Metropolitan Open Land to Urban Open Space and allocate for additional primary school (Langley Park Free School)

14 responses were received –1 email, 13 responses online (of which five approved of the proposals without commenting)

Respondent	Summary of issues	Officer comment
1 individual	<p>Impact on the local environment</p> <ul style="list-style-type: none"> • Langley Nature Reserve lies to the north and should be protected from development • Why is Langley Nature Reserve not a SINC? 	<p>The proposed boundary reflects the edge of the SINC wildlife. UDP Policy NE2 (emerging policy 8.3) refers to development affecting SINC's.</p> <p>The Borough has 5 Local Nature Reserves. There is no Local Nature Reserve designation to the north of the site, it is however designated as a SINC.</p>
4 individuals	<p>Impact on local education needs</p> <ul style="list-style-type: none"> • Expansion is necessary as new housing villages in Langley mean that many people previously in the catchment for Langley secondary school will need to look elsewhere • Development should not go ahead if it adversely impacts on current secondary schools' performance • Loss of open space will damage childrens' health and affect their physical and scientific education • An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	<p>The provision of appropriate education development supports children's health and education.</p> <p>The decision to approve the opening of new Free Schools rests with the Secretary of State for Education rather than the Local Authority Emerging policy 6.6 under the Local Plan Draft Policies and Designations Consultation document, released in February 2014, encourages proposals involving the sharing of facilities, including open spaces, between educational facilities and/or the dual use of educational facilities by the wider community.</p>
1 individual	<p>Impact on character</p> <ul style="list-style-type: none"> • Such a significant change would be highly detrimental to the open character of the land and therefore an alternative site with easier access/parking would be more appropriate 	<p>The proposed designation is designed to ensure that any new school is closely related to the existing schools complex. The impact any particular development will be considered at planning application stage</p>
2 individuals	<p>Traffic implications</p> <ul style="list-style-type: none"> • Adding a primary school will add to the congestion through the golf course and around the swimming pool lights • Site is not suitable without significant road network modification 	<p>Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "acceptable" for an additional primary school, subject to the detail of a planning application, which will be required to address access / highways issues and minimise / mitigate impacts as appropriate.</p>
2 individuals; Head Teacher LPS for Boys	<p>Questions surrounding the site</p> <ul style="list-style-type: none"> • Why does the draft document only include the immediate area of the school buildings and not the additional playing fields that the school owns? • It is not clear as to where the primary school is to be located • Will Langley Park Girls' School be re-built alongside the construction of a primary school? • Why can't the school be built on the private sports ground? • Have any alternative sites been located? 	<p>Initial discussions with the Multi Academy Trust suggested the development of primary school infrastructure interspersed within the existing Langley Boys and Girls schools. However, this would have presented challenges on well utilised school sites and the site has been reassessed to amend the boundary, reducing the amount of land to be released from MOL, and providing a discreet area to the south side of Hawkswood Lane</p> <p>Education Background paper has assessed all potential sites.</p>
2 individuals	<p>Legal matters</p> <ul style="list-style-type: none"> • Proposals do not adhere to national and regional policy as no very special 	<p>The Local Plan Draft Policies and Designations Consultation document, (February 2014) and the Education Background paper set</p>

	<p>circumstances can be said to exist – a general pressure of need for school places does not constitute very special circumstances</p> <ul style="list-style-type: none"> • No justification is given for a universalised de-designation rather than the normal approach of a Green Belt review 	<p>out the exceptional circumstances which justify the release of MOL (consistent with the NPPF guidance on the release of Green Belt)</p>
<p>Education Funding Agency</p>	<p>An alternative MOL boundary proposed to facilitate the new primary school. The EFA proposal involves the redesignation of the land used as playing fields at Langley Park School for Girls.</p>	<p>It remains logical to de designate the Langley Park Boys School from the MOL, however it is recommended that the boys school field area of approximately 1.2ha previously indicated for re designation as UOS is maintained as MOL and an area approximately 0.75ha to the south side of Hawksbrook Lane is proposed for re designation to UOS to support the allocation of a new primary school. This new area of proposed designation is located on land between the existing school hockey pitch and Langley Park Golf Course which is a SINC and has a significant tree screen. Any application will be required to address these site constraints, however, it is considered that the proposed area of 0.75ha should enable a suitably designed scheme to be devised. (Note a 0.5ha reduction in the area of redesignation from MOL to Urban Open Space) .</p>

Site: Mead Road, Chislehurst

Current Proposal: Redesignate this Green Belt fringe site from Green Belt to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period.

22 responses were received – 2 letters, 4 emails, 16 responses online (of which two stated objections without comments)

Respondent	Summary of issues	Officer comment
2 individuals	Impact on biodiversity <ul style="list-style-type: none"> • Development would threaten local trees • Local housebuilding has already cumulated in the loss of local wildlife habitats 	Noted
1 individual	Impact on enjoyment of the area <ul style="list-style-type: none"> • Development on open space will compromise children’s health and education • Green open spaces benefit residents beyond those in the school’s immediate vicinity 	It is no longer proposed to remove the Green Belt designation from this site.
8 individuals; Mead Road Residents’ Association	Traffic implications <ul style="list-style-type: none"> • Mead road is severely congested at present 	
5 individuals; Mead Road Residents’ Association	Local infrastructure limitations <ul style="list-style-type: none"> • The Green Lane/Mead Road junction is already too dangerous without the further pressures expansion would bring • Expansion of Mead Road school into a junior school would alleviate pressures on other local schools to take in their pupils 	
1 individual; Lanniston Developments Limited	Alternative sites <ul style="list-style-type: none"> • Edgebury School is a more appropriate site to expand • No alternative sites have been identified 	
3 individuals; Chislehurst Society	Future development <ul style="list-style-type: none"> • Redesignation is a preliminary to enabling some other form of development • Why are there no proposals to expand Mead Road considering it is a high performing school? 	
10 individuals; Chislehurst Society Mead Road Residents’ Association	Legal matters <ul style="list-style-type: none"> • No proposal to increase the current capacity of mead Road School in the “local plan” • Redesignation of land from Green Belt to Urban Open Spaces leaves site vulnerable to development • The proposal does not demonstrate the very special circumstances that justify the redesignation of Green Belt land. • Residents of The Meadow were not notified of the proposals in the LAFPD 	

Site: Midfield Primary, Grovelands and the Link Youth Centre Midfield Way

Current Proposal: Redesignation of this Green Belt fringe site from Green Belt to Urban Open Space and allocate for additional education development within the site during the local plan period.

13 responses were received – 1 letter, 2 emails, 10 responses online (of which 4 offered no comments)

Respondent	Summary of issues	Officer comment
The Woodland Trust	Impact on biodiversity <ul style="list-style-type: none"> Ancient woodland is irreplaceable and should not be lost 	No intention to propose development on ancient woodland. The boundary has been revised to minimise the area to be removed from Green Belt. Impact on woodland to be assessed at planning application stage.
1 individual; CRA20ten Residents' Association	Impact on enjoyment of the area <ul style="list-style-type: none"> Takes away environmental amenities from Midfield Primary School and the Link Youth Centre 	The provision of appropriate education development supports children's health and education.
1 individual	Impact on character <ul style="list-style-type: none"> Open spaces are at a premium in the borough 	The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The Education Background Paper sets out the evidence base and assesses potential sites. The enhancement of provision on existing education sites limits the need to seek wholly new sites on open space. However, even with the selective expansion of existing education sites, the Council will retain Urban Open Space designations.
1 individual; Crofton Residents' Association	Impact on existing infrastructure <ul style="list-style-type: none"> Local roads are already at capacity 	Noted Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "acceptable" for educational expansion. Any proposal would be subject to a planning applications which will be required to address highways and access arrangements and mitigate adverse effects.
2 individuals	Alternative sites <ul style="list-style-type: none"> No alternative sites have been explored 	Education Background paper has assessed all potential sites.
2 individuals	Future development <ul style="list-style-type: none"> Land is likely to be developed for housing 	No other forms of development proposed. Additionally existing schools are to be designated as "Education Land" under draft Policy 6.5 and safeguarded for education purposes.
4 individuals; The Woodland Trust CRA20ten	Legal matters <ul style="list-style-type: none"> NPPF para 18 "Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats" The proposal does not demonstrate the very special circumstances that justify the redesignation of Green Belt land 	The boundary has been revised to be drawn more closely around the existing school development and minimise the area to be removed from Green Belt. In respect of Green Belt the Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area,

Residents'
Association

coupled with the lack of appropriate sites constitute the “exceptional circumstances” which justify specific alterations to the Green Belt boundary through Local Plan review in line with the NPPF section 9.

The Council is not proposing a full scale Green Belt Review, rather, to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education) it has considered all the existing Green Belt / Metropolitan Open Land school sites. The proposed new boundaries will be defined clearly, using readily recognisable physical features and are likely to be permanent, not requiring alteration at the end of the development plan period.

Site: Turpington Lane Allotments

Current Proposal: Redesignation of this isolated Green Belt site from Green Belt to Urban Open Space and allocate for additional secondary school within part of the site during the local plan period.

38 responses were received – 14 letters, 5 emails, 19 responses online (of which one stated an objection without a comment)

Respondent	Summary of issues	Officer comment
<p>4 individuals; Bromley Common Allotment Garden Association; London Wildlife Trust; Orpington Field Club</p>	<p>Impact on biodiversity</p> <ul style="list-style-type: none"> • The allotment provides a corridor for a variety of wildlife • Soil has been nurtured for a long period of time and would be difficult to replicate • Trees on site subject to TPO 	<p>Noted</p> <p>The proposed allocation focusses on the unused land south of the allotments. The supporting text to the draft allocations policy states that 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.</p> <p>The whole area is to be redesignated as Urban Open Space. Additionally the allotments site to the north of the proposed education allocation is to be designated as 'Local Green Space'.</p>
<p>18 individuals; Bromley Common Allotment Garden Association</p>	<p>Impact on enjoyment of the area</p> <ul style="list-style-type: none"> • Residents enjoy growing and picking of food • The majority of plot owners are local • Long waiting list for allotment plots • The allotment supplements the small or lack of gardens in Trinity Village • Provision of after-school activities may disturb residents • A large number of children already use Turpington Lane and a new school would exacerbate this issue • The site contributes to residents' good health 	<p>Allotments to be retained / reprovided as appropriate on site.</p> <p>Operation of educational facility to be assessed and adverse amenity issues mitigated through the determination of a planning application and appropriate design and conditions.</p>
<p>15 individuals; Lanniston Developments Limited</p>	<p>Impact on character</p> <ul style="list-style-type: none"> • The allotment is considered to be an important means of community cohesiveness • Site is one of a few green spaces in the local area • There are many schools in the area already 	<p>Allotments to be retained / reorganised as appropriate. Land to be redesignated Urban Open Space.</p> <p>Evidence base suggests greater needs for schools. The Education Background paper has assessed all sites and demonstrates the lack of alternative suitable sites.</p>
<p>13 individuals; Bromley Common Allotment</p>	<p>Traffic implications</p> <ul style="list-style-type: none"> • Existing schools have put pressure on roads • Turpington Lane has insufficient capacity to handle the additional traffic that a school would create • Turpington Lane is already subject to traffic calming measures 	<p>Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "acceptable" for educational development. Any proposal would be subject to a planning application which will be required to address highways and access arrangements</p>

Garden Association		and mitigate adverse effects.
6 individuals; Bromley Common Allotment Garden Association	Alternative sites <ul style="list-style-type: none"> No proposals for a new allotment site and limited/no scope for a new, nearby allotment site/there are more appropriate sites 	Allotments to be retained / reorganised as appropriate.
7 individuals; Bromley Common Allotment Garden Association	Impact on local infrastructure <ul style="list-style-type: none"> One, infrequent bus route on Turpington Lane The road is narrow and not safe for children to be walking down Access to the site is limited 	Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "acceptable" for educational expansion. Any proposal would be subject to a planning application which will be required to address highways and access arrangements and mitigate adverse effects. .
18 individuals; Bromley Common Allotment Garden Association; London Wildlife Trust; Lanniston Developments Limited; Orpington Field Club	Legal matters <ul style="list-style-type: none"> Contradicts London Plan Policy 7.22 (protection of allotments) LBB 6.8 DPDC 2014 states that the council will safeguard existing allotment sites Development will only be considered where appropriate re-provision is made in accessible locations Proposed development on Green Belt land does not warrant "very special circumstances" Further intrusion on Green Belt land after the loss of Green Belt land to Trinity Village Obligations to enhance existing allotments as part of the development of Trinity Village were not fulfilled Bromley Common Allotment Garden Association were not consulted despite being principal stakeholders 	Allotments to be retained / reorganised as appropriate. The site has become isolated from the Green Belt and following the Trinity Village development and whilst it fulfils an open space purpose it no longer fulfil the purposes of including land within that designation. It presents an opportunity to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education). Concern re consultation noted and addressed.

Site: 1, Westmoreland Road, Bromley**Current Proposal:** Allocate, in whole or in part, for education use (University Technical College)

9 responses were received – 1 email, 8 responses online (of which 6 approved of the proposals without commenting)

Respondent	Summary of issues	Officer comment
1 individual	<ul style="list-style-type: none">Local transport infrastructure will need to be improved as it is at capacity	Initial highway assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is recommended for secondary education. Any proposal would be subject to a planning application which will be required to address highways and access arrangements and mitigate adverse effects.
1 individual	<ul style="list-style-type: none">The building has been empty for too long and needs to be put to good use	Noted. The building is partly in use as a temporary site for the Harris Shortlands Primary School
1 individual	<ul style="list-style-type: none">Acceptable only if green space on site is protected	There is limited green space on site. The design of development will be subject to assessment through a planning application

Site: Land at Bushell Way, Chislehurst (also referred to as Walden Woods)

Current Proposal: Develop part of the site for a primary school, retain in Urban Open Space

295 responses were received – 7 letters (including 39 Proforma letters and a petition signed by 122 residents), 119 emails, 108 responses online.

Respondent	Summary of issues	Officer comment
<p>14 individuals;</p> <p>The Friends of Chislehurst and Walden Recreation Grounds;</p> <p>Director Lanniston Developments Limited</p>	<p>Site specific issues</p> <ul style="list-style-type: none"> • Whole site allocation – larger than needed • Undulating - suitability? • Ground not suitable for building • Area has been used extensively for dumping – possible asbestos and hazardous waste? • The site is so close to the borough boundary that LBB will be providing more spaces for non LBB residents than LBB residents • Land cannot be built on because of underground electric cables that give off EMFs • There are electrical cables that are regularly dug up when there are local problems • Poor access 	<p>The Draft Allocations, Further Policies and Designations document indicates an allocation “within” the area of Urban Open Space (and SINC) at Bushell Way. With the intention of allocating the most appropriate area within that site.</p> <p>See draft Local Plan for proposed area for allocation.</p> <p>Any planning applications will be required to undertake robust assessments including for contamination and appropriate mitigation ensured if planning permission is to be achieved</p> <p>Discussions with UKpowernetworks confirm that development in the area selected is acceptable.</p> <p>The area allocated allows for the need for an planning application to address the requirements for appropriate buffer around and access to energy infrastructure (underground cables)</p>
<p>9 individuals;</p>	<p>Opposed to plans</p> <ul style="list-style-type: none"> • Generally opposed without being specific 	<p>Noted</p>
<p>108 individuals;</p> <p>Friends of Chislehurst and Walden Recreation Grounds;</p> <p>The Woodland Trust;</p> <p>Director Lanniston Developments Limited</p>	<p>Impact on environment / biodiversity</p> <ul style="list-style-type: none"> • An assessment should be carried out • Site of Importance for Nature Conservation • Variety of animal and birdlife – general biodiversity • Presence of Protected species • Ancient woodland • House sparrows present – Red List species (RSPB) • There is Japanese knotweed on the site • Seasonal pond • Was once used as watercress beds • Woodland is the lungs of “Clean and Green” Bromley and should not be destroyed • Wide range of flora and fauna • Development would destroy young oak trees which are a legacy for future generations • This important conservation area needs to be preserved • Green Belt land is playing an ever increasing part in supporting clean air and water drainage • Removal of soak away land will increase the likelihood of localised 	<p>An initial biodiversity study was undertaken earlier in the year which indicated the area of least ecological value and this is being supplemented by further seasonal research is being finalised. Any planning application will be required to undertake appropriate mitigation and remediation work.</p> <p>The area proposed minimises the impact on biodiversity (based on initial survey work) and the community use of the open space</p> <p>Any application will be required to ensure appropriately landscaped public access, enhancing the access from Bushell Way through to the open space “Walden Woods” and recreation ground.</p>

	<p>flooding</p> <ul style="list-style-type: none"> • There are very few local woods left • Reduction in woodland and an increase in traffic will decrease the quality of the air • Noise pollution • Area has been subject to extensive ongoing woodland management over the course of the last two years. • Woodlands close to a bird sanctuary • Tawny owls present • Trees keep the air fresher and hold many other health benefits • The development on the former college site has caused the path alongside the woods to flood, and further development will exacerbate this issue • Presence of stag beetles • Construction would create extra noise pollution • Global warming will be accelerated by the loss of Green Belt land 	
<p>92 individuals; Friends of Chislehurst and Walden Recreation grounds; Director Lanniston Developments Limited</p>	<p>Impact on Community</p> <ul style="list-style-type: none"> • Enjoyment of the area • (Dog/family) Walking • Green Chain walk (also an important means of walking across Bromley) • Health and wellbeing • Loss of shared recreation space which creates “community” • “Friends of Chislehurst”/ “Friends of the Rec” efforts • Likely to upset volunteer groups dedicated to the protection and maintenance of parks and green spaces • Many residents of Chislehurst have joined various bodies for the sole purpose of protecting woods/open space/wildlife sanctuaries • Residents experiencing a steadily decreasing level of quality of life. • St Nicholas School has been part of the community since Victorian times • Changes to the parish and community life would be considerable. • Previous development has brought about anti-social behaviour • Site is unique in that it doesn’t generally have sports/playgrounds or other noisy activities going on • Many residents of Oakdene Avenue rent the land out the back as allotments • Development would have a detrimental impact upon nearby properties • Privacy concerns re: backing onto houses on Oakdene Avenue • There have long been plans (as shared with LBB Parks about 3 or so years ago) to look for suitable grant funding to open up the area up once again for community use once knotweed eradication has been completed • Will affect the peace and quiet for nearby residents 	<p>The selected area does not impinge on the Green Chain walk, however the importance of access through the site is recognised and any application will be required to ensure appropriately landscaped public access, enhancing the access from Bushell Way through to the open space “Walden Woods” and recreation ground.</p> <p>The allocation has been made to address the pressure for primary school places either through a relocated Chislehurst St Nicholas or alternative primary provision. Chislehurst St Nicholas is indicated as a potential user of the site with their stated desire to expand and in the absence of acceptable alternatives, however, as an academy, that would be a decision for the school.</p> <p>Any proposals will be required to mitigate impacts on biodiversity, minimise the impact on trees ensuring a buffer to adjacent properties including houses on Oakdene Avenue.</p>
<p>60 individuals; The Friends of</p>	<p>Impact on character</p> <ul style="list-style-type: none"> • Chislehurst is a village • The area is becoming increasingly urbanised 	<p>Some concerns appear related to residential development. There is no allocation for residential development. The site will remain UOS and residential development would therefore be contrary to UOS policy The</p>

Chislehurst and Walden Recreation Grounds	<ul style="list-style-type: none"> • Development will block the view of canary wharf • Other loss of landscape • Already too much new development in the area (200+ housing development, Ravensbourne College) • Extra footfall along previously quiet streets • Chislehurst's greenery is unique and not like other soulless areas of urban sprawl • The ancient cow path is of historical interest • Cow path has been a public right of way for hundreds of years • Residents moved into Chislehurst because of its greenery • Woodlands add to the special character of the area 	<p>allocation is for education use only and the allocated land will be defined as "Education Land", safeguarded for education use for the Plan period.</p> <p>The selected are does not impinge on Cow Path.</p> <p>Any application will need to take account of the topography of the site and protect important views. The site has significant height differences with the area selected approximately 30m lower than the open recreation ground and subject to appropriate design development can be achieved without impacting on views of Canary Wharf.</p>
19 individuals;	<p>Impact upon existing infrastructure</p> <ul style="list-style-type: none"> • Roads, schools and doctor surgeries are at full capacity • Access onto the recreational ground will be reduced • Only two supermarkets to serve existing and all new housing developments • No study appears to have been published concerning the impact that more urbanisation will have on the surrounding area's infrastructure • If housing and schools are to be built, it would be more sensible to spread the development across smaller sites in the borough • Development would cut into existing footpath • Insufficient drainage for further development 	<p>Some concerns appear related to residential development. There is no allocation for residential development. The site will remain UOS and residential development would therefore be contrary to UOS policy The allocation is for education use only and the allocated land will be defined as "Education Land", safeguarded for education use for the Plan period.</p> <p>The Education Background Paper sets out the evidence base and assesses potential sites.</p> <p>The selected site avoids cow path / Green chain walk, however, the importance of access through the site is recognised and any application will be required to ensure appropriately landscaped public access, enhancing the access from Bushell Way through to the open space "Walden Woods" and recreation ground.</p> <p>Any planning applications will be required to undertake robust assessments including flood risk assessments and appropriate mitigation ensured if planning permission is to be achieved.</p>
77 individuals; The Friends of Chislehurst and Walden Recreation Grounds	<p>Accessibility & Traffic implications</p> <ul style="list-style-type: none"> • Already too much traffic in the local area, particularly along White Horse Hill • Increased parking will make pulling out of side roads dangerous • Bushell way is a small cul-de-sac with inadequate vehicular access for a school • Victoria Road is only one-way and is already at capacity during peak hours • Proximity to other primary schools will exacerbate congestion at the time of the school run • Road safety decreased for children • There is already a shortage of parking and illegal parking which would be made worse • Limit pedestrian route to the station – increase car use • A proper detailed study should be made of the road access and traffic 	<p>Initial highways assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "good" for an additional school. Any planning application which will be required to undertake robust assessments of the impacts of development including the highways implications and to address the access / highways issues and minimise / mitigate as appropriate.</p>

	<p>congestion</p> <ul style="list-style-type: none"> Limited public transportation in the area will increase car use Parents may have to drive to new St Nick's site whereas previously they were able to walk Unsustainable nature of car use to travel to school Sale of Banbury House will add to traffic complications Public library car park often exploited for school parking Proposals for the Marks and Spencers development at Chislehurst library and potentially a Co-Op at the site of the former "Lounge" Pub 	
<p>51 individuals; Aquinas Church of England Education Trust</p>	<p>Schools in the area</p> <ul style="list-style-type: none"> Is Bromley working with Greenwich regarding school provision? (the area is already served by Montbelle, Red Hill and Castlecombe) Chislehurst is already well-endowed with schools Many schools in the immediate vicinity of the proposed site If St Nicks is moved, there will be no schools left in the immediate area Schools should be far apart to improve overall accessibility to them Especially close proximity to Red Hill school 	<p>The Education Background Paper sets out the evidence base including the Primary Schools Development Plan which details the need for places. The Council has a duty to co-operate with other authorities over strategic matters such as education. The pressure for places being experienced in Bromley is similarly being felt in neighbouring boroughs. The location in relation to existing schools is impacted by the scarcity of available sites.</p>
<p>47 individuals; The Friends of Chislehurst and Walden Recreation Grounds; Director Lanniston Developments Limited</p>	<p>Other Options</p> <ul style="list-style-type: none"> Should be considered Cross borough (Greenwich) options Other sites must exist that are more accessible Existing schools should be expanded instead Previous plans to extend Mead Road more logical Why can't the development go on the present site of St Nicks? St Nicholas may have rights to other land that could be developed Why can't the church use its own land? Brownfield sites should be developed first Sevenoaks way has more suitable plots Sports ground on Elmstead Lane would be a more accessible site Bull Lane is a suitable site for the expansion of St Nick's Schools have been closed down – why can we not re-use those sites? Buller's Wood School for Boys has been ongoing with little progress Manor Park Road – Queen Mary House – is being pulled down for more retirement homes when it would be a more appropriate for the school Walden Woods should be saved and community centres built to contribute to the area's culture Site would be better suited for small businesses, industrial or storage purposes If the need for schools is so high, why wasn't this taken into consideration when the former Ravensbourne College site was turned into a residential site? There is a drought of schools in the Elmstead Woods/Old Chislehurst area 	<p>The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The Education Background Paper sets out the evidence base and assesses potential sites, taking account of a range of factors including the protection afforded to sites within Green Belt and Metropolitan Open Land and other designations.</p> <p>The permission for residential development on Ravensbourne College pre dates the currently recognised trend in demand for school places.</p>

<p>53 individuals;</p> <p>Director Lanniston Developments Limited;</p> <p>Aquinas Church of England Education trust</p>	<p>Relationship with St Nicholas church</p> <ul style="list-style-type: none"> • Bushell Way site is too far from the church • Education time will be lost with children having to go to and from the church • Difficulty for working parents having to take their children to a far-away school • Moving the school discriminates against those who do not drive • Will the land be paid for by the Church Diocese? • Improbable that the governors of St Nicholas would support a relocation so far from their current site and their church • A move would impact upon the school's current excellent academic record • A move would threaten the ethos of the school • St Nicholas Church makes a distinctive and positive link with the school • It would be destroying communal land for the gain of a non-inclusive Church of England school which would not benefit the whole community • A faith-based admissions policy in this day and age is unacceptable 	<p>The allocation has been made to address the pressure for primary school places either through a relocated Chislehurst St Nicholas or alternative primary provision. Chislehurst St Nicholas is indicated as a potential user of the site with their stated desire to expand and in the absence of acceptable alternatives, however, as an academy that would be a decision for the school.</p>
<p>36 individuals;</p> <p>Parochial Church Council of St Nicholas School;</p> <p>The Friends of Chislehurst and Walden Recreation Grounds;</p> <p>Aquinas Church of England Education Trust</p>	<p>Legal matters</p> <ul style="list-style-type: none"> • There is a covenant • The land was bequeathed to the residents of Chislehurst with the instruction that it should not be built on • No "very special circumstances" • Site has been rejected in the past on the basis that the "landfill necessity" was deemed unacceptable • Reasons given for not allocating the land for residential use apply equally in relation to an "educational" development • Educational facilities being allowed yet housing not under similar conditions • The council are inconsistent in their planning decisions • Bromley's planning policy G8, clause 8.33 – open spaces require protection as they make a significant contribution to the residential environment • Contravenes Natural Environment and Rural Communities (NERC) Act 2006; Countryside Act 1981; Conservation of Habitats and Species Regulations 2010 • Clause 8.37 – The acceptability of any proposal will be dependent on its scale in relation to the size of the open space • GLA recommends that all SINC's be protected from harm • Including ancient woodland within the footprint of a proposed new school development would run contrary to both local and national policy as well as Natural England's Standing Advice • Plans are in conflict with the Local Plan • Not in conformity with the London Plan • The Forestry Commissions Woodland Improvement Grant included funding conditions that placed a requirement on Bromley Council to ensure the 	<p>The area is not within Green Belt or Metropolitan Open Land which would require the demonstration of "very special circumstances".</p> <p>The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places.</p> <p>Any proposal will need to address legal constraints and planning applications will be required to undertake robust assessments including for contamination and appropriate mitigation ensured if planning permission is to be achieved.</p> <p>The allocation is not exclusive to Chislehurst St Nicholas Primary School.</p>

	<p>longevity of the wood</p> <ul style="list-style-type: none"> • No justification given for a universalised de-designation rather than the normal approach of a Green Belt Review • UOS designation would delay delivery of school • School's Governing Body, nor the Diocese have been consulted • There should be a delay in decisions until plans have been circulated to a wider audience by letter 	
9 individuals; The Woodland Trust	<p>Issues with portal/documentation</p> <ul style="list-style-type: none"> • Submitting objections via the portal is overly confusing • Documentation is full of technical jargon, making it confusing to the average person • Letters sent out refer to the site as the 'Former Whitehorse Hill Allotments' which is confusing • SINC review document on our website lists new sites, upgrade of sites and minor boundary changes – no indication is made within this document to removing land at Bushell Way from the SINC • 	Noted
29 individuals	<p>Open Space</p> <ul style="list-style-type: none"> • Should be protected for future generations • Contradicts Council policy protecting open space • Blanket sanctioning of development on open space 	<p>Noted.</p> <p>An allocation was proposed "within" the wider defined area is solely for education development. Following consultation and further study the precise area within the site has now been proposed.</p>
19 individuals	<p>Future Development</p> <ul style="list-style-type: none"> • Proposal would be a back door to other development • Worries that the land used as the current St Nicholas' site will be used for housing • Any housing built would be unaffordable to younger people • Sets a precedent on the ease of redesignating land • Even though the document appears to confirm that this land will continue to be UOS, the map appears to redesignate the whole area (including the woodland) to "none", providing no protection from any future development • Concern about houses on Walden Wood 	<p>An allocation was proposed "within" the wider defined area is solely for education development. No other development planned.</p> <p>Non education development would be contrary to the Urban Open Space and Education Policies applying to the site</p> <p>Should Chislehurst St Nicholas relocate any proposals for their existing buildings will be determined in accordance with planning legislation.</p>
39 individuals	<p>Proforma letter (39 responses)</p> <ul style="list-style-type: none"> • History of road traffic accidents on White Horse Hill • Very limited parking in the local area • Victoria Road and Bushell Way are narrow roads that parents will use to park in, then walk their children to school • Recent developments on Bushell Way have led to a significant increase in cars parked • Existing problems could be worsened by existing development proposals – Chislehurst library and the site of The Lounge • The proposed site was contaminated land in 1986 • Clearing the space for buildings would threaten the abundance of flora 	<p>Initial highways assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "good" for an additional school.</p> <p>Any planning application which will be required to undertake robust assessments of the impacts of development including the highways implications and to address the access / highways issues and minimise / mitigate as appropriate.</p> <p>An initial biodiversity study was undertaken earlier in the year which indicated the area of least ecological value and this is being supplemented by further seasonal research is being finalised. Any</p>

	<p>and fauna</p> <ul style="list-style-type: none"> • This site is a recognised Site of Importance for Nature Conservation • The loss of open green space threatens the town's character 	<p>planning application will be required to undertake appropriate mitigation and remediation work.</p> <p>The area proposed minimises the impact on biodiversity (based on initial survey work) and the community use of the open space</p>
122 individuals	<p>Petition to oppose allocation for development at Bushell Way, former Whitehorse Hill allotments</p> <ul style="list-style-type: none"> • Unsustainable levels of traffic and parking issues • Disruption to local residents • Loss of valuable land of importance for nature conservation • Loss of open space that contributes to the character of Chislehurst 	<p>Noted – responses as above</p>

Site: Edgebury Primary School, Slades Drive, Chislehurst

Current Proposal: Redesignate Green Belt land from Green Belt to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the Local Plan period

21 responses were received – 1 email, 20 responses online

Respondent	Summary of issues	Officer comment
6 individuals	General support for educational expansion of Edgebury Primary School site	Support welcomed.
1 individual	General opposition to educational expansion of Edgebury Primary School site	The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for expansion. Responses to specific concerns are detailed subsequently.
5 individual	Concerns over loss of Green Belt designated land as a result of educational expansion	The Local Plan evidence base establishes that there is an urgent need for additional primary school capacity which can, in part, be accommodated through the expansion of existing schools. Redesignation facilitates the ability of the Council to keep the school organisation and size in planning area 6 under review to efficiently consider and respond to any future proposal for further educational expansion of the Edgebury Primary School.
1 individual Chislehurst Society	Clarification needed as to why redesignation is required to enable educational expansion	
1 individual	Suggest other alternatives to expand current educational use rather than physical development	
1 individual	Potential to expand recreational uses and promote healthy lifestyles would be diminished	The open space intent of the site is proposed to be retained, whilst enabling a primary school use to function. Under Draft Policy 6.6 “Educational Facilities” of the Emerging Local Plan, all new school buildings should be sensitively designed to minimise the loss of open space and the impact of development..
4 individual	Traffic and transport: <ul style="list-style-type: none"> Existing road network already strained by current traffic Cumulative effect of both expansion of Edgebury Primary School and new secondary school on adjacent site will exceed road network’s capacity 	Initial highways assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated “acceptable”. Further expansion would be subject to planning and any application would be required to include robust assessments of the impacts, including highways implications, and involve appropriate mitigation.
1 individual	Amenity impacts of proposed educational expansion, such as noise and pollution	Noted. Matters relating to noise, light and air impacts would be carefully considered as part of any planning application.
1 individual	Suggest searching for alternative sites in brownfield locations to develop new primary schools rather than educational expansion of Edgebury Primary School site	The Education Local Plan Background Paper, based on the Council’s strategic documents Primary School Development Plan establishes that there is an urgent need for additional school capacity and highlights the scarcity of appropriate sites. There are 3 new Free Schools open within the Borough and a 4 th proposed, only two of the new Free Schools have planning permission for permanent locations. The 2016 Primary Development Plan indicates that school organisation in this planning area needs to be kept under review and the site assessment methodology ranked the site above a number of other

		sites in suitability for educational expansion.
1 individual	Question whether a need for school places constitutes a “very special circumstance” to redesignate Green Belt land	The Council’s statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the “exceptional circumstances” which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF.
1 individual	Methodology application: <ul style="list-style-type: none"> No justification is given for a universalised reallocation, rather than a Green Belt Review. Should instead be a site-by-site Green Belt Review to assess in each case presence of actual and long-term very exceptional circumstances. 	<p>The evidence base involves a robust assessment of potential sites without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that “exceptional circumstances” exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning Policy Guidance.</p> <p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education).</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for expansion.</p>
1 individual	There should be particular safeguards in place that any currently perceived need for school places does not represent a temporary demographic hump (measured on a timescale of decades not years) and that any duly agreed change of use has safeguards that returns the land to its earlier use, should the school use be no longer required at a future time.	<p>The proposed redesignation provides an Urban Open Space designation for the subject land.</p> <p>There is no proposal to change the use of the site. The Draft Local Plan Education Allocations Policy clarifies that should proposals not come forward to meet educational need other non-policy compliant uses will be resisted</p>

Site: Land adjacent to Edgebury Primary School, Slades Drive, Chislehurst

Current Proposal: Redesignate Green Belt land to Urban Open Space and allocate the site, which has a covenant for education use, for an additional secondary school during the Local Plan period.

40 responses were received – 2 letters, 12 emails, 26 responses online

Respondent	Summary of issues	Officer comment
4 individuals	General support for use of site for educational purposes	Support welcomed, although the boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development
1 individual	Conditional support for use of site for educational purposes: <ul style="list-style-type: none"> • School should encompass infants to 6th form (potential to absorb Mead Road Infants School) • Ample playing fields should be provided with public access allowance • Investigate opportunities to co-locate other community services / facilities on site 	<p>The Emerging Local Plan has considered the physical attributes of the subject land against established urgent need for additional secondary school capacity. The presumption is that new schools will be provided via the Free School route. Any new Free School would be an Academy and, subject to planning permission, it will be for the schools to determine the nature of school proposed. Whilst the site has been allocated in response to the need for secondary education the allocation for secondary would not prohibit an all through school, addressing secondary and other needs, should such a proposal be forthcoming.</p> <p>The Emerging Local Plan also proposes changes to facilitate educational expansion opportunities at Edgebury Primary School (a Community School, controlled by the Local Authority) and Mead Road Infants School (an Academy, outside Local Authority control).</p> <p>The proposed redesignation is justified by exceptional circumstances, notably the pressing need for additional educational capacity. Whilst any new school might seek to open its facilities to the wider community, the exceptional circumstance regarding this proposed redesignation specifically relates to the educational use and any potential co-location of services or facilities would be considered separately.</p>
1 individual	General objection to use of site for educational purposes	Responses to specific concerns are detailed subsequently.
20 individuals	Traffic and transport: <ul style="list-style-type: none"> • Site access is limited to Edgebury and Belmont Lane • Belmont Lane is already at capacity with through traffic and bus routes 160 and 162 • Secondary schools have larger capacity and larger catchment causing farther reaching congestion • Narrow road configuration and on-street parking restricts two-way traffic movement 	Initial highways assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated “acceptable” for an additional school, subject to the detail of a planning application which will be required to undertake robust assessments of the impacts, including highways implications, and appropriate mitigation and conditions attached if planning permission is to be achieved.

	<ul style="list-style-type: none"> • High foot traffic volume in close proximity to busy roads will create a safety issue • Visitors from the opposite side of the A20 will only be able to do so via Five Ways or the A222, which are already heavily congested at peak times. • Expansion of existing Edgebury Primary School will already cause strain on local road network • Existing Edgebury Primary School is situated in this locality as it is a primary school that draws from a catchment area that is within easy walking distance. A new secondary school would not fit this description. 	
3 individuals	<p>Public transport:</p> <ul style="list-style-type: none"> • Bus route 162 identified in a TfL report as being in the top 10 most crowded bus routes in London • Site is a considerable distance from nearest train station (New Eltham) which is 25-30 minutes walk away • Lower serviceability will force more visitors to travel by private car 	The site has low ranking Public Transport Accessibility (PTALs 1a – 2,). Any planning application will need to address the highways issues and produce a travel plan seeking to mitigate the impact of the current low PTAL level.
5 individuals	<p>Parking:</p> <ul style="list-style-type: none"> • Edgebury, Belmont and Slades Drive already suffer from a lack of parking spaces which will be exacerbated by new school • Planning Application 14/02730/FULL1: Council's highways officer comments highlighted a parking issue in the area. • Many students and visitors at the new secondary school will travel by private car and therefore add to strain on on-street parking capacity 	As above. Expected travel behaviours of visitors to a new secondary school use, including resultant parking requirements, will be need to be robustly assessed as part of any planning application.
5 individuals	Unacceptable amenity impacts caused by school children walking down Belmont Lane and Green Lane	Noted. Matters relating to noise, light and air impacts will need to be considered an addressed as appropriate as part of any future planning application.
2 individuals	Unacceptable noise impacts as a result of the operation of the new school	
3 individuals	Unacceptable pollution impacts caused by visitors to the new school	
22 individuals	<p>Character of site and surrounds:</p> <ul style="list-style-type: none"> • New school is inconsistent with rural character of local area • Area adjacent to the school is predominantly open land, used for both agricultural and recreational purposes. Proposed new school will damage character of locality. • Further development is inconsistent with intended character of Green Belt. • Query explanation in Draft Allocations, Further Policies and Designations (DAFPD) document which states that the section of Green Belt within which the school is located is becoming increasingly isolated as the school site transitions to Urban Open Space. • While not necessarily open to the public, the existing Green Belt designation provides relief against spread of urban development. • Potential to expand recreational uses and promote healthy lifestyles would be diminished 	<p>Taking into account legal and policy constraints, options for a future designation and allocation of this land, and the adjacent Edgebury Primary School site, have been carefully evaluated in Education Evidence Base. Considering the established urgent need for additional capacity for new secondary schools in the Borough, the scarcity of alternative non Green Belt sites and the nature of this particular Green Belt site, lying at the fringe of the Green Belt, bounded on three sides by suburban (residential) development and the fourth by an expanding primary school, it is considered that "exceptional circumstances" are demonstrated for its release from Green Belt. Additionally a historical covenant exists on this site for a secondary school use</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p>
2 individuals	Site would be better utilised for community open space purposes, such as a nature reserve or educational resource for existing schools (e.g. environmental or	The open space nature of the site around any school proposal will be

	agricultural)	controlled by the proposed designation as Urban Open Space and the proposed allocation as "Education Land" . Under Draft Policy 6.6 "Educational Facilities" of the Emerging Local Plan, all new school buildings should be sensitively designed to minimise the loss of open space and the impact of development. 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.
4 individuals	Environmental value of site and surrounds: <ul style="list-style-type: none"> Land contains flora species of biodiversity value that justifies retention for open space purposes Open space nature of land provides habitat for fauna such as badgers, owls and hedgehogs 	The site is not affected by specific biodiversity designations however, any planning application will be required to include Assessments of the impacts of development and undertake appropriate mitigation. Furthermore, landowners are subject to separate legislation in respect of their duties with regard to protected species.
3 individuals	Question the need for secondary school in this locality, given other schools are within close proximity of the site	The Education Local Plan Background Paper, based on the Council's strategic documents Primary School Development Plan and "Planning of Secondary School Places", establishes that there is an urgent need for additional school capacity in the planning area and surrounds. The Councils approach to education provision includes the extensions to existing schools where appropriate in order to limit the need to seek wholly new sites on open space. However, even with the selective expansion of existing education sites the Council has found it necessary to allocate further designated open spaces. The Evidence Base includes a comprehensive assessment of other potential sites.
5 individuals	School would be more appropriately located on an infill (previously developed) site or by extensions to existing schools	
4 individuals	Concern that school use may be replaced with urban uses such as housing if it becomes surplus to requirements at a future stage.	The Emerging Local Plan package has not considered sites with open space designations for residential purposes.. The proposed allocation as Education Land safeguards the land for education purposes only. Additionally, under the proposed redesignation as Urban Open Space, residential land uses would be contrary to policy.
1 individual	Suggest portion of subject land be provided for housing types	
5 individuals; Chislehurst Society	Concerns over consultation process: <ul style="list-style-type: none"> Concerned about perceived lack of notification of local residents, residents have not received any mail notifications from the council. Suggest that major policy decisions be publicised separately by the Borough in the form of circulars or the like. Concerns that nearby Greenwich Borough residents are not aware of proposed changes. Has the Royal Borough of Greenwich been consulted? Request more meaningful consultation with local residents on the scale and design of the proposed new school use and opportunities for public access 	Noted. Residents in the vicinity of the subject land, including residents of both the LBB and Greenwich Borough, were consulted on the draft redesignations and reallocations on both the Edgebury Primary School site and the land adjoining this site. There will be further consultation on the draft Local Plan. Under Duty To Cooperate requirements, the LBB has consulted with neighbouring boroughs on various stages to date and will continue to collaborate with these boroughs on cross-boundary matters.

2 individuals; Chislehurst Society	Proximity to Greenwich borough boundary: <ul style="list-style-type: none"> The site is located very close to boundary with Greenwich. A new school will provide significant benefit to residents of Greenwich at the expense of LBB residents. How will the LBB Council measure the additional capacity provided solely to LBB residents when the site is in such close proximity to the boundary. 	The proposed allocations in the are justified on the Local Plan Background Paper for Education, which sets out the projected needs in the Bromley Borough. Similarly, Greenwich Borough is undertaking a consultation to meet its projected education needs. Whilst councils address their own projected need, they have a duty to co-operate in respect of cross-boundary matters, and under parental choice applications for school places can be made to schools in different local authorities.
2 individuals; Chislehurst Society	Description of proposed change: <ul style="list-style-type: none"> Unclear what the possible intensity of land use might be (numbers of students, visitors etc). Confusion over why redesignation from Green Belt to Urban Open Space is required 	Following robust assessment of potential sites this site is proposed for allocation to meet the projected need for places, however, since education is not an ‘appropriate’ Green Belt use it is necessary to remove the site from Green Belt. The redesignation from Green Belt to Urban Open Space enables an education land use to occur whilst resisting other non education developments and ensuring that the open nature of the site is properly considered in the design of any school development . The provision of new schools is in the form of Free School Academies (outside local authority control). Any proposal will be subject to planning permission, and required to respond to the new Urban Open Space designation and policy which ensures sensitive siting to limit as far as possible the impact of the development on the open nature of the site. The allocation relates to the need over the lifetime of the Local Plan and there is no current free school provider.
1 individual	DAFPD document, Summary Information and Key Policy Restraints states that the subject land is adjacent to the Lewisham Borough boundary. This appears to be incorrect.	Noted. This is an error that should instead read as “Adjacent to Greenwich Borough boundary”.
1 individual	Depiction of borough boundary appears to be incorrect. The boundary with Lewisham Borough should run approximately two thirds of the way up Edgebury and across the middle of the subject land.	Noted. The boundary depicted in the DAFPD document is correct, however the description of the site contained in the Education Local Plan Background Paper contains an error and should read “Adjacent to Greenwich Borough boundary”, rather than Lewisham Borough.
2 individuals	Question whether a need for school places constitutes a “very special circumstance” to redesignate Green Belt land	The Emerging Local Plan documents consider known potential sites without Green Belt and Metropolitan Open Space designations for education use. The evidence base demonstrates that further capacity is still required. Therefore, whilst the Council is not proposing a full scale Green Belt Review, it has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocation, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education). Additionally, two further Green Belt sites are proposed specifically for education, where land, by virtue of redevelopment or proposed de-designation of adjacent sites, has become isolated from the Green Belt and no longer fulfil the purposes
1 individual	Methodology application: <ul style="list-style-type: none"> No justification is given for a universalised reallocation, rather than a Green Belt Review. Should instead be a site-by-site Green Belt Review to assess in each case presence of actual and long-term very exceptional circumstances. 	

		<p>of including land within that designation.</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p> <p>The Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the "exceptional circumstances" which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF.</p>
1 individual	<p>There should be particular safeguards in place that any currently perceived need for school places does not represent a temporary demographic hump (measured on a timescale of decades not years) and that any duly agreed change of use has safeguards that returns the land to its earlier use, should the school use be no longer required at a future time.</p>	<p>The current projected need is for 36 forms of entry to secondary school up to 2022/23 – this relates to the current cohort of 5 year old children and is therefore a robust projection.</p> <p>The draft Local Plan education policy safeguards land in or proposed for education uses for that purpose for the period of the Plan.</p>

Site: James Dixon Primary School, Anerley

Current Proposal: Redesignate this Metropolitan Open Land (MOL) fringe site from MOL to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period

5 responses were received – 1 letter, 4 responses online (of which one agreed with the proposals without commenting)

Respondent	Summary of issues	Officer comment
1 individual; London Wildlife Trust	Impact on enjoyment of the area <ul style="list-style-type: none"> Removal of MOL designation increases risk that the planned future development will reduce the amount of open space and people's access to nature Development on open space will compromise children's health and education 	Existing schools are to be designated as "Education Land" under draft Policy 6.5 and safeguarded for education purposes. The provision of appropriate education supports children's health and education The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.
1 individual	Alternative sites <ul style="list-style-type: none"> No alternative sites have been identified 	The Education Local Plan Background Paper, based on the Council's strategic documents Primary School Development Plan establishes that there is an urgent need for additional school capacity and highlights the scarcity of appropriate sites. There are 3 new Free Schools open within the Borough and a 4 th proposed, only two of the new Free Schools have planning permission for permanent locations. The 2016 Primary Development Plan indicates that James Dixon presents an opportunity for an additional form of entry
1 individual	Future Development <ul style="list-style-type: none"> An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	There is currently a Boroughwide shortfall of 9 FE being met through 7 bulge classes and a 2FE Free School operating from a temporary location. The projections indicate that the increased intake will continue at the current projected high level. However the redesignation to Urban Open Space and the allocation as Education Land ensure against development for non educational uses
2 individuals; London Wildlife Trust	Legal matters <ul style="list-style-type: none"> It has not been demonstrated that the proposed redesignation for Metropolitan Open Land merits very special circumstances No justification is given for universal de-designation rather than the normal approach of a Green Belt review 	The Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the "exceptional circumstances" which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF. The evidence base involves a robust assessment of potential sites without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that "exceptional circumstances" exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning

		<p>Policy Guidance.</p> <p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education).</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p>
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Site: Oaklands Primary School, Biggin Hill

Current Proposal: Redesignate this Green Belt fringe site from Green Belt to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period

6 responses were received – 6 responses online (of which two left no comments)

Respondent	Summary of issues	Officer comment
1 individual	Impact on enjoyment of the area <ul style="list-style-type: none"> Development on open space will compromise children's health and education 	The provision of appropriate education supports children's health and education
1 individual	Impact on character <ul style="list-style-type: none"> Expansion should not endanger green spaces 	The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The proposed redesignation as Urban Open Space will ensure that any necessary school development seeks to minimise the impact on the open nature of the site
1 individual	Alternative sites <ul style="list-style-type: none"> No alternative sites have been identified 	The expansion of existing schools helps limit the pressure to develop on wholly open space sites. The Education Background paper has assessed all potential sites.
1 individual	Future Development <ul style="list-style-type: none"> An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	There is currently a Boroughwide shortfall of 9 FE being met through 7 bulge classes and a 2FE Free School operating from a temporary location. The projections indicate that the increased intake will continue at the current projected high level. Oaklands Primary School currently has insufficient classrooms to cater for the published admission numbers and is indicated as requiring further places later in the plan period. There is an application currently under consideration. The redesignation to Urban Open Space and the allocation as Education Land ensure against development for non educational uses
2 individuals	Legal matters <ul style="list-style-type: none"> It has not been demonstrated that the proposed redesignation for Green Belt land merits very special circumstances No justification is given for universal de-designation rather than the normal approach of a Green Belt review 	<p>The Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the "exceptional circumstances" which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF.</p> <p>The evidence base involves a robust assessment of potential sites without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that "exceptional circumstances" exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning Policy Guidance.</p>

		<p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education).</p> <p>The proposed new boundaries are defined clearly, using readily recognisable physical features (roads) and are likely to be permanent, not requiring alteration at the end of the development plan period.</p>
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Site: Scotts Park Primary School, Orchard Road

Current Proposal: Redesignate this metropolitan Open Land (MOL) fringe site from MOL to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period

7 responses were received – 1 email, 6 responses online (including two individuals who agreed with the proposal without commenting)

Respondent	Summary of issues	Officer comment
1 individual	Impact on biodiversity <ul style="list-style-type: none"> • Woodland on the site is adjacent to a SINC and is part of the Green Chain 	<p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p> <p>The site lies within the Green Chain (a designation which will be retained) and adjacent to a SINC. The adjacent woodland is covered by a blanket TPO but the woodland within the school site (previously under Council control) has no preservation order. Given the transfer of the lease to the school academy (outside Local Authority Control) consideration of a Tree Preservation Order would be appropriate. In any event the impact upon any trees, biodiversity and the local environment would be assessed and minimised / mitigated as appropriate at planning application stage. Any proposal would need to conform with other Local Plan policies, relating to the conservation and management of trees and the impact of development on the SINC Green Chain and the proposed new Urban Open Space designation</p>
3 individuals	Impact on local educational needs <ul style="list-style-type: none"> • The council needs to provide stability and security to families in the area • Development should not be at the expense of school playing fields – children need somewhere to conduct PE; an issue that should be taken into consideration given a rise in childhood obesity • Children’s health and physical/scientific education will be damaged 	<p>The Council has a statutory duty under the Education Act 1944 to secure sufficient school places within its area.</p> <p>There is currently a Boroughwide shortfall of 9 FE being met through 7 bulge classes and a 2FE Free School operating from a temporary location. Scotts Park has provided bulge classes over several years and an application is currently lodged to incorporate these as part of a permanent expansion.</p> <p>The comments of Sport England regarding any impacts on playing fields are sought as part of the planning application process.</p> <p>The provision of appropriate education development supports children’s health and education.</p>
1 individual	Alternative sites <ul style="list-style-type: none"> • No alternative sites have been identified 	Education Background paper has assessed all potential sites
1 individual	Legal matters <ul style="list-style-type: none"> • Proposals do not adhere to national or regional policy as no very special circumstances can be said to exist 	<p>The Council’s statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the “exceptional circumstances” which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF.</p> <p>The evidence base involves a robust assessment of potential sites</p>

		<p>without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that “exceptional circumstances” exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning Policy Guidance.</p> <p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education).</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p>
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Site: St Hugh's playing field, Bickley**Current Proposal:** Allocate this Urban Open Space site, owned by Bullers Wood School for Girls for an additional secondary school (Bullers Wood School for Boys)

42 responses were received – 4 emails, 38 responses online (of which 23 agreed with the proposals without commenting)

Respondent	Summary of issues	Officer comment
2 individuals	<p>Comments on the site:</p> <ul style="list-style-type: none"> Heightened demand for educational facilities may only be a temporary demographic hump and may not be needed in the future The site does not seem large enough for a school and playing fields 	<p>The projections indicate increasing pressure with demand for 34 additional forms of secondary education by 2022 (Secondary School Development Plan 2016)</p> <p>The site is approximately 4.6ha and therefore whilst the playing field would be somewhat limited there is potential for enhanced use of the open space.</p>
1 individual	<p>Impact on biodiversity</p> <ul style="list-style-type: none"> Development would be detrimental to the local environment 	<p>The site is covered by a blanket TPO. The impact upon any trees and the local environment to be assessed and minimised / mitigated as appropriate at planning application stage.</p>
6 individuals	<p>Impact on the community</p> <ul style="list-style-type: none"> Provides a much needed all-boys school to the local community Bullers' Wood is already an outstanding state school and a boys' school presents a good opportunity Relieve some local pressure off Coopers Important that Bromley improves school choice No Boys' school in Chislehurst – others are in Bromley, Orpington and Hayes Cause a reduction in local house prices Local residents currently unable to exit their homes at peak hours Concerns that a secondary school would rent out its facilities to third parties and this would lead to commercial activity into the night 	<p>The desire for a local boys school is noted.</p> <p>Any planning applications will be required to undertake robust assessments of the impacts of development including for example highways implications, and appropriate mitigation and conditions attached if planning permission is to be achieved.</p> <p>Whilst the dual use of education facilities is supported by policy planning conditions can be applied to resist unacceptable impacts.</p> <p>The impact on house prices will vary and is not a material consideration</p>
1 individual	<p>Impact on character</p> <ul style="list-style-type: none"> Leafy fence down Chislehurst Road boundary has been there for 60-65 years and its removal would be a massive environmental change to the Bickley area 	<p>The site is covered by a blanket TPO. The retention of trees will be an important element in any planning application</p>
2 individuals	<p>Impact on the provision of education</p> <ul style="list-style-type: none"> Takes away areas which could be used for PE lessons Childrens' health and physical/scientific education will be damaged 	<p>The views of Sport England will be sought as part of any planning application. The provision of appropriate education facilities supports children's health and education.</p>
7 individuals	<p>Traffic/parking/Road safety implications</p> <ul style="list-style-type: none"> Evidence needed on how the school would be marshalled in respect to traffic/parking, drop off/pick ups Site is well serviced by local transport An entrance along the A222 would be dangerous The increase in traffic and the corresponding parking issues will cause chaos in the bottleneck at A222/Blackbrook Lane Long/short term parking problems in Hill Brow and Woodlands Road 	<p>Initial highways assessment of the site, looking at the operation of local junctions, the 3 year safety record and bus, rail and cycle information indicates that the site is rated "good" for an additional school, subject to the detail of a planning application which will be required to address the access / highways issues and minimise / mitigate as appropriate.</p>

	<ul style="list-style-type: none"> • 2/3 roads surrounding the site are very narrow • Already a parking issue outside the Stephen James BMW garage • Access to this school would cause so much additional traffic in an area which is already very busy at peak times • There will be inadequate parking on site for the increasing number of pupils/teachers. • Congested at the junction of the mini roundabout at Bickley Rd/Chislehurst Rd 	
1 individual	<p>Alternative sites</p> <ul style="list-style-type: none"> • Should be explored 	Education Background paper sets out the evidence base and assesses potential sites.
1 individual	<p>Relationship with Buller's Wood School for Girls'</p> <ul style="list-style-type: none"> • Close situation to the girls' school will allow for greater collaboration between the two schools and will enhance the performance and social development of students 	Noted
1 individual; Director Lanniston Developments Limited	<p>Legal matters</p> <ul style="list-style-type: none"> • The Green belt designation has been inappropriate for far too many years • The proposals do not adhere to national or regional policy as no very special circumstances can be said to exist: a general pressure of need for school places does not constitute very special circumstances • No justification is given for a universalised de-designation rather than the normal approach of a Green Belt Review 	<p>The site is not a Green Belt Site.</p> <p>The Education Evidence Base considers known potential sites without Green Belt and Metropolitan Open Space designations for education use. The evidence base demonstrates that further capacity is still required.</p>
4 individual	<p>Open Space</p> <ul style="list-style-type: none"> • Should be retained • The majority of St Hugh's playing field should be maintained as a green area • Once playing fields are built on, they are gone forever 	<p>The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The Education Background Paper sets out the evidence base and assesses potential sites. The enhancement of provision on existing education sites limits the need to seek wholly new sites on open space. However, even with the selective expansion of existing education sites the Council has found it necessary to allocate further designated open spaces.</p> <p>The provision of appropriate education development supports children's health and education.</p>

Site: St Mary Cray Primary School, Park Road

Current Proposal: Redesignate the area of Green Belt within this site from Green Belt to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period.

6 responses were received – 6 responses online (of which one approved of the proposal without commenting)

Respondent	Summary of issues	Officer comment
3 individuals	<p>Impact on enjoyment of the area</p> <ul style="list-style-type: none"> • This space is not currently utilised by any group, organisation or community • It would be possible to incorporate the Sea Cadet's space adjacent to the school within this proposal in return for access to the school for meetings in the evening • Expansion should not endanger green spaces 	<p>The area for redesignation is current school land. The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places. The removal of Green Belt designation requires the demonstration of "exceptional circumstances" – none have been demonstrated for the land other than the school site.</p>
1 individual	<p>Impact on local educational needs</p> <ul style="list-style-type: none"> • Good use of under-utilised space for the school to have access to expand into • Development will compromise childrens' health and physical/scientific education 	<p>The provision of appropriate education supports children's health and education</p>
1 individual	<p>Alternative sites</p> <ul style="list-style-type: none"> • No alternative sites have been identified 	<p>Education Background paper has assessed all potential sites</p>
1 individual	<p>Future Development</p> <ul style="list-style-type: none"> • An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	<p>There is currently a Boroughwide shortfall of 9 FE being met through 7 bulge classes and a 2FE Free School operating from a temporary location. The projections indicate that the increased intake will continue at the current projected high level. The redesignation to Urban Open Space and the allocation as Education Land will facilitate future expansion and ensure against development for non educational uses</p>
2 individuals	<p>Legal matters</p> <ul style="list-style-type: none"> • The proposals do not adhere to national or regional policy as no very special circumstances can be said to exist • No justification is given for a universalised de-designation rather than the normal approach of a Green Belt Review 	<p>The Council's statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the "exceptional circumstances" which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the NPPF.</p> <p>The evidence base involves a robust assessment of potential sites without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that "exceptional circumstances" exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning Policy Guidance.</p> <p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan</p>

		<p>strategy for meeting identified requirements for sustainable development (education).</p> <p>The proposed new boundaries are defined clearly, using readily recognisable physical features (roads) and are likely to be permanent, not requiring alteration at the end of the development plan period</p>
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Site: Wickham Common Primary School, Gates Green Road

Current Proposal: Redesignate this Green Belt fringe site from Green Belt to Urban Open Space to facilitate educational expansion opportunities to meet identified need during the plan period

10 responses were received - 10 responses online (of which two left no comments)

Respondent	Summary of issues	Officer comment
3 individuals	<p>Impact on enjoyment of the area</p> <ul style="list-style-type: none"> Wickham Common School has already been expanded in the last couple of years and this Green Belt land should be protected Proposal would ruin the enjoyment of all the properties around the site and diminish their value Expansion should not endanger green spaces 	<p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p> <p>The Council values all its designated open spaces, however, it is also required to meet the social infrastructure needs of the population (including educational needs) and has a statutory duty under the Education Act 1944 to secure sufficient school places.</p> <p>Any proposal would require planning permission and be subject to the policies of the plan regarding amenity, highways and open space, in addition to the requirements of the Education and Urban Open Space policies requiring sensitively designed and sited buildings to secure the privacy and amenities of adjoining properties</p>
2 individuals	<p>Impact on local educational needs</p> <ul style="list-style-type: none"> Development should not be at the expense of school playing fields – children need somewhere to conduct PE; an issue that should be taken into consideration given a rise in childhood obesity Children’s health and physical/scientific education will be damaged 	<p>The comments of Sport England regarding any impacts on playing fields are sought as part of the planning application process.</p> <p>The provision of appropriate education development supports children’s health and education.</p> <p>The provision of appropriate education supports children’s health and education</p>
1 individual	<p>Alternative sites</p> <ul style="list-style-type: none"> No alternative sites have been identified 	Education Background paper has assessed all potential sites
Director Lanniston Developments Limited	<p>Other opportunities</p> <ul style="list-style-type: none"> School is flanked by land that could be allocated for housing provision – all within walking distance of a well-respected primary school 	<p>Unrelated to the allocation</p> <p>The adjacent land is Metropolitan Green Belt. The proposed de designation is for education purposes only</p>
1 individual	<p>Future Development</p> <ul style="list-style-type: none"> An increase in demand for schools may be temporary and land should be returned to its protected status should this be the case 	There is currently a Boroughwide shortfall of 9 FE being met through 7 bulge classes and a 2FE Free School operating from a temporary location. The projections indicate that the increased intake will continue at the current projected high level. The redesignation to Urban Open Space and the allocation as Education Land ensure against development for non educational uses
2 individuals	<p>Legal matters</p> <ul style="list-style-type: none"> The proposals do not adhere to national or regional policy as no very special circumstances can be said to exist No justification is given for a universalised de-designation rather than the 	The Council’s statutory duty under the Education Act 1944 to secure sufficient school places within its area, coupled with the lack of appropriate sites constitute the “exceptional circumstances” which justify specific alterations to the Green Belt boundary through Local Plan review in line with the Section 9 Protecting Green Belt Land of the

	<p>normal approach of a Green Belt Review</p>	<p>NPPF.</p> <p>The evidence base involves a robust assessment of potential sites without Green Belt and Metropolitan Open Space (MOL) designations for education use. The evidence base demonstrates that further capacity is still required. Whilst the Council is not proposing a full scale Green Belt / MOL Review, the education need is such that “exceptional circumstances” exist to support the redesignation of specific school sites through the local Plan process, in line with National Planning Policy Guidance.</p> <p>The Council has considered all the existing school sites in Green Belt / Metropolitan Open Land, to determine whether their reallocations, in line with the NPPF, would ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (education).</p> <p>The boundary has been reassessed to minimise the land to be taken out of Green Belt whilst making appropriate allowance for educational development.</p>
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**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

GETTING AROUND

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Getting Around – General

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.1 Parking	1 Individual	Support minimum parking standards- but finds the minimum too low given that couples or small families have 2 cars already.	Noted. Amendments have been made in line with the London Plan.
7.1 Parking	GLA - Transport for London	<p>These are not considered in conformity with the London Plan. The use of the words 'require' and 'minimum' in tandem in particular are considered to be contrary to the broad thrust of the London Plan, which seeks to minimise traffic growth, promotes mode shift towards non-car modes and making best use of land. This is particular pertinent in Bromley and Orpington town centres and other higher PTAL areas that exhibit inner London characteristics (for example lower car ownership), such as Crystal Palace and Penge.</p> <p>The explicit wording in part i) also seems inconsistent with part ii) of the policy. It is acknowledged that the FALP allows flexibility for residential parking standards in lower PTAL areas, however it still clearly promotes lower levels of car parking provision in higher PTAL areas. Therefore the following changes are suggested to better reflect the FALP 'parking for residential development' table (page 230 of the consultation FALP) whilst still allowing for local discretion in determining planning applications:</p>	Noted. 7.1ii) and 7.1v) provide flexibility for the Council to reduce parking provision in areas of high PT accessibility.
7.1 Parking	GLA - Transport for London	<p>i. The Council will normally require expect off-street parking spaces to be provided in new residential development at minimum levels <u>in accordance with the standards</u> set out as follows: 4 or more bedrooms <u>up to</u> 2 spaces 3 bedrooms <u>up to</u> 1.5 spaces 1-2 bedrooms <u>up to</u> 1 space</p>	Noted, Amendments have been made in line with London Plan.
7.1 Parking	GLA - Transport for London	<p>ii. The accessibility, type, mix and use of any new development along with availability and opportunity for public transport will be considered when determining appropriate levels of residential vehicle parking. <u>In particular, lower levels of car parking may be acceptable in areas of good public transport accessibility and higher levels of parking may be acceptable in areas of lower public transport accessibility.</u></p>	Noted and wording has been amended.
7.1 Parking	GLA - Transport for London	The supporting text should acknowledge that the London Plan should be taken into account when setting local parking standards , rather than only the NPPF as the current text implies.	Supporting text para 5 acknowledges the LP's flexibility.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.1 Parking	GLA - Transport for London	The use of London Plan car parking standards for non-residential land uses, electric vehicle charging infrastructure, disabled parking and cycle parking is strongly welcomed .	Noted.
7.1 Parking	GLA - Transport for London	Amend table showing the development type / PTAL matrix (page 82). A tick should be added to the first line in the 'high PTAL' box — i.e. large regional retail should be allowed in high PTAL area.	Typo has been amended.
7.1 Parking	Hayes Village Association	Support policy. All development should have realistic provision for all on-site parking including visitors, and space for, other members of families acquiring cars in the future. Developers should be prevented from making use of existing on street parking around a site to provide parking that they should provide on their site. There needs to be control of commercial vehicles, and caravans parked in front gardens.	Noted. Currently managed under policy Housing policy H13 Parking of Commercial Vehicles.
7.1 Parking	Intu Properties Plc (nlp)	No objection to parking for non-residential in line with London Plan but table <i>PTAL matrix should be amended to indicate that large regional class A1 development is acceptable in locations with a PTAL level 5 or 6 (high) as well as level 3 or 4 (moderate)</i> .	Typo has been amended.
7.1 Parking	London Square (Montagu Evans) Site – Hayes Court , Hayes	Supports minimum levels of off-street parking to be provided in new residential development. Sufficient off-street parking ensures new residential developments do not impact upon the transport network in which they are located.	Noted.
7.1 Parking	Taylor Wimpey East – (Montagu Evans) Site - Conquest House	Direction of policy is currently contradictory. It is important that policy is consistent with the core planning principles within the NPPF that seek to make the fullest use of public transport, walking and cycling.	Parking policies are consistent with the NPPF which offers LAs flexibility to determine their own standards, in line with the London Plan including the MALP. More generous parking in lower PTAL areas has been included.
7.1 Parking	Taylor Wimpey East – (Montagu Evans) Site - Conquest House	Parking sets out minimum levels of off-street parking spaces to be provided in new residential development. It is important to consider the accessibility, type, mix and use any new development in terms of transport impact. In sustainable locations where excellent transport links exist, private car ownership is not essential.	Additional line added to policy 7.1 as per GLA's comments to note locations where public transport accessibility is high and therefore parking provision can be lower.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.1 Parking	Taylor Wimpey East – (Montagu Evans) Site - Conquest House	Parking appears to be making a case for the provision of car parking when Parking Standards in the London Plan are clearly maximum standards. There should in our view be no policy requirement to provide car parking other than disabled provision. LBB retain ability to control over parking of site and consequently it is for developers and indeed future owners/occupants of residential units to determine lifestyle choices.	In recognition of the MALP recommendations, LBB will seek to exercise the flexibility which has now been granted for new developments within PTAL 2.
7.1 Parking	1 Individual	Parking around or near train stations is difficult, a lot of people drive to train stations so this should be considered. For example reviewing wider access to permits for commuters or removing yellow lines.	Policy 7.1v. makes provision for this.
7.2 Relieving congestion	Highways Agency	Include following text at ii 'will require the submission of a Transport Assessment, setting out the impacts of their development on the local transport network (<i>and strategic road network where applicable</i>)' and the mitigation measures proposed to deal with the impacts.	Text added.
7.2 Relieving congestion	1 Individual	1. Part of the transport plan should explicitly give due consideration to rat running and heavy goods vehicles using residential roads. The basis for changing road layouts and traffic calming should not only be road safety and deaths but also the impact excessive volumes of traffic causes to residential roads, where people sleep, children play and the stress it causes to residents,	Dismissed.
7.3 Access to services for all	Chislehurst Society	High car dependency implies addiction rather than informed choice and could lead to the wrong policies. In the absence of poor public transport facilities for residents outside fixed routes makes car use essential and not an addiction. There needs to be a clear policy to balance transport flow maintenance and walking and cycling. At key junctions in Chislehurst there is a clear bias in favour of the motor vehicle, with little if any monitoring of high speed and ignoring traffic signs. These have a negative impact on pedestrians.	Policy 7.3 ensures access to services for all, specifically provision for pedestrians, cyclists and Public Transport users.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.3 Access to services for all	GLA – Transport for London	4 A new part iv) should be added: <i>'Where appropriate, developments may be expected to contribute towards the cost of implementation of the strategic transport schemes supported in policies 7.5 and 7.6'.</i>	Noted and added.
7.3 Access to Services for All	Intu Properties plc (nlp)	Supports policy.	Noted
7.3 Access to Services for All	NHS- Healthy Urban Development Unit	We note that Bromley has a large and growing older population and that this has implications for housing and other services. The provision of extra care housing and other forms of supported accommodation supports NHS objectives to provide integrated care outside of hospitals. We strongly support the reference to Lifetime Neighbourhoods (under Policy 6.1 Community Facilities) which can both help prevent chronic illness and provide services and support networks to create inclusive communities. 1. We suggest that the concept of Lifetime Neighbourhoods, as a cross-cutting theme, is referred to other policies including Policy 7.3. 2. We suggest that the policy 7.3 is split into policies on walking; cycling; and public transport infrastructure improvements that the health benefits of active travel should be noted.	Noted. Dismiss notion of separating policy 7.3 into separate policies to reference 'walking,' 'cycling,' and 'public transport infrastructure' as are all adequately covered under existing policy.
7.4 Highway Infrastructure Provision	Beckenham Society	1. Sub-paragraph (ii): delete "suitable" and insert "offered". The abbreviation of the wording of this UDP policy in the draft LDP has changed the meaning of the policy without authority to do so. The legal position is that developers (of housing estates) have a choice of either offering new estate roads for adoption or retaining them as private unadopted roads. There are examples throughout the Borough of developers opting to keep an estate road private eg. Queenborough Gardens.	Dismissed.
7.4 Highway Infrastructure Provision	Beckenham Society	<u>Sub-paragraph (iii):</u> delete" normally"	Dismiss - Allows exception to development 20 metres from a road with continuous hard surface.
7.4 Highway Infrastructure Provision	Beckenham Society	<u>Sub-paragraph (iv):</u> delete" normally"	Noted.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.4 Highway Infrastructure Provision	Beckenham Society	<p>The Supporting Text to Policy 7.4 appears to be intended also to support Policy 7.3 Access to Services to All. However the Supporting Text does not support Policy 7.4 (iv) and (v). We suggest an additional paragraph at the end of the Supporting Text (on Page 87) as follows:</p> <p><i>“The Council wishes to ensure that all new residential development is provided with a safe and convenient means of access. The reason for resisting development beyond a specified distance of 20 metres from a hard paved road is that it corresponds to the maximum distance beyond which attendance times for emergency vehicles could be seriously affected. Extra traffic on roads that are not hard paved, particularly construction lorries, will cause deterioration of the road surface. The absence of a footway is unsafe for pedestrians.</i></p> <p><i>Many roads in the Borough are unadopted. They are likely to remain so as they are valued as contributing to the rural ambience of the locality and the rich pattern of settings in the Borough. Proposals for making them up to adoptive standard will only be considered following a referendum of frontagers in favour of adoption to ensure that it is the wish of the owners of a majority length of frontages. The Council will proceed under the provisions of the Private Street Works Code contained in the Highways Act 1980. The costs incurred will be recovered from frontagers in proportion to their length of frontage with the Council paying for lengths unattributable to individual frontagers.”</i></p>	Noted. Some matters raised are not planning matters.
7.4 Highway Infrastructure Provision	GLA – Transport for London	<p>The following text should be added to part ii): ‘Any crossover on the Transport for London Road Network (TLRN) will require approval from TfL, as highway authority for those roads’</p>	Text added.
7.5 Transport investment Priorities	Biggin Hill Airport (nlp)	<p>With increased development at Biggin Hill, there is an urgent need to improve and maintain timely road access not only in the Borough but also across south London, thereby improving access from neighbouring Boroughs by, undertaking highways improvements at key junctions and bottlenecks. There could be an opportunity for LBB to bid for funding to undertake these works, especially where it can be demonstrated that the works are important to the success of development in the key employment areas of the Borough which includes Biggin Hill.</p>	Noted. The borough acknowledges the need to undertake highway improvements at key junctions and bottlenecks.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.5 Transport investment Priorities	Biggin Hill Airport (nlp)	Include an addition to P7.5 which states that the Council will look for opportunities to bid for funding for key highway improvements where they will assist in the success of key employment areas in the Borough and beyond.	Noted.
7.5 Transport investment Priorities	1 Individual	Supports policy in part. The first sentence "The Council supports investment in public transport infrastructure that is critical to the development of the Borough." needs to be enhanced to include other reasons for the investment in public transport in addition to the "development" of the Borough. I suggest that an additional consideration is the safety, health and wellbeing of the residents living in areas which have been impacted by the growth of the use of the car and traffic generally over many years. It is clear that over time a fresh and innovative examination is called for when what were relatively quiet B Roads become overwhelmed by significant traffic flows at peak periods. If this is accepted, then the investment in public transport at peak periods which is reliable and good value will assist to divert people from their cars.	Noted.
7.5 Transport investment Priorities	Copers Cope RA	Include in the plan – <i>Securing additional commuter rail services in London (more services from Beckenham to Blackfriars and beyond plus Beckenham to Clapham Junction)</i>	Outside jurisdiction of the Council.
7.5 Transport investment Priorities	1 Individual	Does not support policy. Bromley Town Centre is already exceptionally well connected. Bromley should support in particular the extension of the Bakerloo Line through Lambeth/Southwark to Crystal Palace.	Bakerloo line extension into borough is currently not supported.
7.5 Transport investment Priorities, and 7.6 Safeguarding land for transport investment	English Heritage	Transport infrastructure proposals will need to take account of any potential implications for heritage assets and their settings. English Heritage will wish to comment on specific schemes when there is information available. This applies to proposals referred to in policies 7.5 and 7.6. We would expect the Policies Map to show those schemes promoted by the plan at the next consultation stage.	Noted.
7.6 Safeguarding land for transport investment	Beckenham Society	<u>Amend last line of Paragraph 7.6 to read:</u> "Restore through overground rail service from Beckenham Junction to Clapham Junction transport and employment hub via Crystal Palace"	Dismiss – not a feasible option.
7.6 Safeguarding land for transport investment	Beckenham Society	Also remove "and Tramlink" from penultimate line of Supporting Text.	Dismiss- Tramlink extensions form part of London Plan 6.2 and requirement to safeguard land.

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
7.6 Safeguarding land for transport investment	Crystal Palace Triangle Group	Support policy	Noted.
7.6 Safeguarding land for transport investment	Croydon LB	It is noted that in P7.6 the route from Beckenham Junction to Crystal Palace is listed and is in alignment with Croydon's Strategic Policies' policy SP8.	Noted.
7.6 Safeguarding land for transport investment	1 Individual	Supports policy in part. The extension of the Docklands Light Railway to Bromley would give excellent links to Lewisham and East London but the Tramlink should also be extended to Bromley to give links to Croydon and thus giving links to southwest London (Wimbledon etc) and all major rail connections and Gatwick Airport.	Dismissed.
7.6 Safeguarding land for transport investment	1 Individual	Extension of the Overground would also link Bromley better with London.	London Overground options to Bromley are being investigated. The Rail Prospectus published in January 2016 seeks to examine the opportunities to improve services in outer London by the transfer of suburban services from the DfT to TfL to effectively expand the London Overground network.
7.6 Safeguarding land for transport investment	1 Individual	Elsewhere in the document reference is made to making Bromley North a major transport interchange. This would be enhanced if a proper main line through train service was provided to Charing Cross, rather than rely on a shuttle service to Grove Park to change.	Unviable due to lack of rail paths into London termini.
7.6 Safeguarding land for transport investment	GLA – Transport for London	<p>7. Policy should also be widened to include other land for transport, in line with the Land for Industry and Transport SPG.</p> <p>Amend title -7.6 Safeguarding land for transport investment.</p> <p>The Council proposes the safeguarding of land and route alignment for the following public transport investment (including land for construction and operation) <u>identified in policy 7.5 when the route alignment/s are confirmed.</u> Docklands Light Railway from Catford to Bromley South via Bromley North Tramlink from Beckenham Junction to Crystal Palace. <u>The Council will continue to safeguard other land for transport, such as bus stands and bus garages, in line with the Land for Industry and Transport SPG.</u></p>	Noted

Objective/ Policy/Issue	Respondent	Summary of issues	Officer Comment
		The supporting text for both policies should be updated to reflect this position.	
7.6 Safeguarding land for transport investment	Robinson Escott Planning LLP7	The land proposed to be safeguarded needs to be shown on a map. The Council should consider, however, the 'blight' implications.	Noted
7.6 Safeguarding land for transport investment	1 Individual	1. Remove 'Tramlink from Beckenham Junction to Crystal Palace'	Dismissed.
7.6 Safeguarding land for transport investment	1 Individual	insert ' <i>Restore through overground rail service from Beckenham Junction to Clapham Junction, key transport and employment hub, via Crystal Palace.</i>	Not a feasible option.
7.6 Safeguarding land for transport investment	1 Individual	Remove 'enhancement of Tramlink' and supportive text but ADD 'enhancement of commuter overground rail services'.	Not a feasible option.
7.6 Safeguarding land for transport investment (A21 Masons Hill, between Kentish Way and the B265 intersection Hayes Lane and Homesdale Road.)	1 Individual	Supports policy in part. Urgent and permanent removal of that part of a safeguarding line in the last UDP which is having a serious and long term detrimental effect on the owners of residential properties on the south-west side of Bromley Common, namely numbers 2-16 Bromley Common.	Welcome support. To be considered - Council currently investigating other options to deal with congestion on this road including tidal flow system. Until the outcome of further study work is available, the area of safeguarded land must remain.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Getting Around – General

22 responses were received – 1 letter, 9 emails and 12 responses online.

Respondent	Summary of issues	Officer comments 2016
Transport for London and the	<p>Revised draft policy safeguarding land for transport investment – Tramlink extension from Beckenham Junction to Crystal Palace</p> <ul style="list-style-type: none"> • TfL notes the inclusion of the policy but is not actively working up options, nor is accommodating any funding in their business plan. <p>Tram platform and stabling facilities – Elmers End:</p> <ul style="list-style-type: none"> • TfL would welcome further discussions and feels upgrades at Elmers End could form an essential part of TfL's future plans for upgrading the tram network <p>DLR extension to Bromley/Bakerloo Line extension</p> <ul style="list-style-type: none"> • TfL will continue to have discussions with Bromley Council on establishing efficient solutions • Previous investigations have demonstrated that the costs are too high for a proposal that would not increase capacity or improve connections into central London • TfL is developing plans for a Bakerloo Line extension as it would offer the best solution in terms of supporting population/employment growth and improving transport accessibility. • TfL is not actively working up options and has not allocated any funding in their business plans <p>Cycling</p> <ul style="list-style-type: none"> • TfL is concerned that the document refers very little to the encouragement of cycling or the provision of routes and facilities for cyclists • London Plan policy 6.9C states development plan documents should “identify, promote and facilitate the completion of relevant sections of cycle routes” • TfL recommends undertaking analysis of the cycle network in Bromley. <p>Parking</p> <ul style="list-style-type: none"> • TfL strongly objects to the parking standards put forward and would welcome further discussions with the council to resolve this issue – minimum standards are not compliant with London Plan policy. <p>Walking</p> <ul style="list-style-type: none"> • Similarly, TfL recommends undertaking an area-wide Pedestrian Environment Review Survey • London Plan policy 6.10 (walking) states DPDs should “provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed 	<p>The Council supports TFL's comments with regard to their response to the Revised Draft Policy Safeguarding Land for Transport Investment.</p> <p>The Council's position on the safeguarding of land for the Tramlink extension from Beckenham Junction to Crystal Palace is unchanged, and should be included within the London Plan. Confirmation of the scale and extent of the tram facilities at Elmers End and the DLR extension to Canary Wharf from Bromley by TfL are awaited by the Council.</p> <p>Although the Council does not support the extension of the Bakerloo Line, it is encouraged that the DLR and Tramlink extensions are still under consideration by TfL and would welcome further dialogue on these aspirations.</p> <p>The draft cycling policies set out in the 2014 consultation will be reviewed and amended to achieve compliance with the aspirations of the London Plan.</p> <p>Support for improvements to A21 cycle route are welcomed and updates from TfL as to when and how this scheme is likely to be implemented are appreciated.</p> <p>It is noted that TfL does not accept the proposed parking standards as set out in the Local Plan as they do not comply with those set by the GLA. Whilst the Council accepts that where PTAL values are moderate or high (3-6), the GLA standard would be acceptable it is recognised that there is an issue with regard to 'minimum' standards as preferred by Bromley Council and 'maximum' as stipulated by the GLA.</p> <p>Following the assessment of the proposed parking revisions in the MALP, the recommendations of the Planning Inspector, to allow outer London Boroughs to apply a more flexible parking standard in PTAL zones 0 – parts of 2, have</p>

Respondent	Summary of issues	Officer comments 2016
	<p>use and that new development improves pedestrian amenity and encourages a higher quality pedestrian and street environment, including the use of shared space principles, such as simplified streetscape, decluttering and access for all.”</p>	<p>been ratified by the Mayor.</p> <p>This ‘flexibility’ is welcomed and fits well with Bromley being an outer London Borough and has quite different demographic, spatial and density characteristics when compared with inner London Boroughs. The other significant change is the move from ‘maximum’ to ‘minimum’ standards in low PTAL zones.</p>
Greater London Authority	Mayor supports TfL’s representation. Mayor suggests that when setting parking standards, Bromley should consider the potential for improvements to public transport provision	GLA’s comments are noted.
6 individual respondents, the Beckenham Society and the Labour Group.	<p>Summary of Issues – Extension of services into Bromley:</p> <ul style="list-style-type: none"> • Should be references to the proposed extension of the Bakerloo Line; • Increased accessibility via the BLE will open up new opportunities for development; • Supports DLR extension; • Opposes a tube service that uses the Hayes Kent line; • Supports Tramlink extension to Crystal Palace • DLR from Lewisham to Bromley unnecessary as there is an existing National Rail line • Although not mentioned, the Beckenham Society opposes the BLE; • BLE should be discussed; • DLR extension mentioned although not an option TfL are working on; • A further arm would result in the pointless loss of the existing superior national rail link between Beckenham Junction, Birkbeck, Crystal Palace and onwards towards Clapham Junction; • Unsightly incursion into Crystal Palace Park resulting in loss of parkland and screening; • Tramlink service open to abuse as stops have no ticket barriers and trams carry no conductors or inspectors; • Expensive for a relatively short extension; • Crystal palace already has a high PTAL rating; • Tramlink should also be extended to Bromley South. 	<p>The comments made about the different rail extension proposals; DLR, Tramlink and the Bakerloo Line have been noted. Although the Council does not support the extension of the Bakerloo Line into the Borough, because it believes it to be a retrograde step in terms of connectivity with residents no longer able to commute directly to the City, it is fighting hard for either the DLR or Tramlink extensions (or both) to go forward for further appraisal work and would be reluctant to be seen to lessen support for either of these potential projects at this stage.</p> <p>The extension of trams to Crystal Palace would open up direct links from other parts of the Borough and other Boroughs to Crystal Palace.</p>
2 individual respondents, the Copers Cope Residents’ Association, Bromley Common Action Group, and the London Borough of Croydon.	<p>Summary of Issues – Safeguarding land for Transport Investment:</p> <ul style="list-style-type: none"> • Strongly supports safeguarding land for tramline between Beckenham Junction and Crystal Palace; • Opposes safeguarding of A21 Masons Hill as it prohibits development – especially when TfL has no plans to widen carriageway; • Supports proposed safeguarding of land for Tramlink extension; • Would like to see safeguarding for the extension of Tramlink to Bromley Town Centre; • Supports safeguarding of land for transport investment schemes (A21 Masons Hill & B265 intersection); • Objects to safeguarding of land for Tramlink. 	<p>The support given to the safeguarding of the Tramlink alignment between Beckenham Junction and Crystal Palace is welcomed.</p> <p>Concerns of safeguarding A21 noted. However, there is a study underway to examine potential improvements to the A21 and it would be somewhat premature to change the current status of the land in question although, at this stage, we cannot give a firm timescale.</p> <p>Objections have been noted.</p>
5 individual respondents,	<p>Summary of Issues – Parking Policy and Parking Zones:</p> <ul style="list-style-type: none"> • Minimum/maximum standards should allow flexibility for a variety of circumstances; 	Comments noted. It is recognised that there will be situations where a CPZ does not exist, yet the availability of

Respondent	Summary of issues	Officer comments 2016
<p>Lanniston Developments, West & Partners, Knoll Residents' Association, Knoll House Residents' Association and the Beckenham Society.</p>	<ul style="list-style-type: none"> • Bromley's previous housing stock struggles to accommodate the demand for parking; • Current inadequate parking provision often inhibits new housing developments; Provisions for visitor parking spaces should be considered for larger developments; • Supports the proposal for revised parking standards; • Developers should provide sufficient parking for all new residents and visitors; • Maps are unclear (North West Parking Zone); • The proposed Beckenham Academy needs residents' parking or off street parking – public access to parking causing parking and traffic issues near Marian Vian school; • The proposed parking ratios are unrealistic for the price of new developments in the area (Orpington); • Public transport links in East and West of Orpington are poor; • Insufficient onsite parking means that normal parking requirements should apply to all new builds in Orpington; • Conflict between DCLG and London Plan parking policy (DCLG requires LAs to set out standards where there is a need for more parking whereas LP imposes maximum parking standards); • Strict parking standards intended for inner boroughs; • Stricter parking standards will contribute towards greater pollution due to higher levels of congestion; • Higher PTALs in NW of LBB do not necessarily correlate to a lesser need for parking; • Lack of parking does not only affect new developments; • Minimum parking standards will lead to more vehicles parking on the street, increasing congestion • Supports the reduction in the requirement for parking spaces for new development; • Access to public transport does not correlate with a lower demand for car use; • Stations typically require more parking spots due to commuters parking; • Support minimum standards but even 1-2 bed flats might need more than 1 car. 	<p>on-street spaces can be very limited and new developments in low PTAL areas will create challenges if insufficient parking is provided within any new development.</p> <p>The acknowledgement of the relationship between parking restrictions in Zone A and accessibility to public transport is welcomed.</p> <p>Comments welcomed. Restricting car parking in areas of high public transport accessibility is still an effective tool in influencing travel patterns and choices, managing demand and the competition for limited road space.</p> <p>The Council does have some sympathy with the view that there is always a risk of parking leaking beyond the curtilage of any new development into already congested streets. The relationship between the three parking zones and low parking standards accords with high PTAL values and is intended to help reduce the levels of car ownership.</p> <p>Whilst the Council does not have a policy about the surfacing of front gardens for parking there is national legislation in respect of permitted development.</p> <p>(See, http://www.planningportal.gov.uk/permission/common_projects/pavingfrontgarden/).</p> <p>Also see response to TfL and GLA.</p>
<p>5 individual respondents, the Knoll House Residents' Association, and the Labour Group.</p>	<p>Summary of Issues – Other Comments:</p> <ul style="list-style-type: none"> • Bromley Council should prioritise improving the services provided by Southeastern; • Objects to public money being used to aid access for airport expansion proposals; • Junction A232/233 requires improvements; • Direct bus route from West Wickham to the PRU required; • Train services to London/South need to be more regular; • Should be more staff at train stations; • Public transport at current is insufficient as a substitute to private car use; • Stricter standards required for the conversion of garages. 	<p>It is very unlikely that TfL would agree to provide a direct service to the Princess Royal Hospital, Orpington, when there are already a number of services that enable the Hospital to be reached.</p> <p>The Council has identified A233 Leaves Green Road/Downe Road to Blackness Lane, Keston, as in need of improvement, and this will be assessed.</p> <p>Improvements to stations are covered in the Infrastructure Delivery Plan and the Council will continue to lobby for improvements to services in the Borough. Staffing of stations and services is not an issue for the Local Plan.</p>

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

VALUED ENVIRONMENTS

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Valued Environments – Nature Conservation and Development

Objective/ Policy/ issue	Respondent	Summary of main substance raised in representation	Officer Comment
Policy 8.2 – development and SSSI's	Bromley Biodiversity Partnership	Areas of Hayes and Keston Commons are Sites of Special Scientific Importance. The high level of housing proposed for this area should take these important wildlife areas into consideration and make sure that there is no adverse effect on the wildlife and associated habitats.	Noted. Individual sites require submission of information about the relevant protected area and any potential impacts before applications can be determined.
Policy 8.2 – development and SSSI's	Orpington Field Club	River Ravensbourne, Ravensbourne Valley Woodlands, Keston & Hayes Commons. This important wildlife area associated with the River Ravensbourne includes a SSSI in the south and forms a wildlife corridor into the town centre.	Noted.
Policy 8.2 – development and SSSI's	Natural England	In Section 15 Biodiversity under paragraph 15.1.8 the addition of a "no net loss" line into Policy 8.2 Development and SSSI would be welcomed as mentioned in the SA, in order to help strengthen this policy in accordance with the legislation.	It is considered that the proposed draft policy provides sufficient protection to land identified SSSI.
Policy 8.3 – Development and Nature Conservation Sites	Nathaniel Lichfield & Partners for Biggin Hill Airport	BHAL welcomes this proposed policy approach which provides sensible flexibility for development proposals which could make a contribution to wider strategic planning policy and economic objectives.	Noted.
Policy 8.4 – Wildlife features	West and Partners for Relta Ltd - Dylon	Support	Noted.
Policy 8.5 – Additional nature conservation sites	Orpington Field Club	Support	Noted.
Policy 8.6 – Protected species	Bromley Biodiversity Partnership	Supporting text: although the various Schedules which cover protected species are mentioned in the supporting text, the inclusion of only Schedule 8 species may be a bit misleading. Slow worm, viviparous lizard and grass snakes are protected from killing or injuring under Schedule 5 and should be included in the list of species. There is some concern that planners may not be sufficiently aware of the life histories of protected species and their particular requirements which should be taken into account when considering planning applications. Would a series of 'trigger lists' be helpful? Such lists are available for bats in buildings from the Bat Conservation Trust and no doubt lists for other species are available too.	Comment taken into account in latest draft Local Plan Reference in supporting text to include Bromley Biodiversity Plan which identifies priority species and further details in relation to Bromley.
Policy 8.6 – Protected species	Orpington Field Club	Suggest a list of criteria to prompt planning staff to ask for more detail re protected species. For example: Is there a pond in the area: check for great crested newts. Do bats forage here? Hedgerows: used by bats to navigate to foraging areas and as foraging areas, habitat for dormice (south of the borough) and nesting birds. If a hedgerow is to be removed this must be done October -February Woodland: check for dormice, especially in the south of the borough Old trees/trees with holes and crevices: may be bat roosts. Rivers: wildlife corridors used by bats Ivy-clad trees and walls: roosting sites for bats, nesting sites for birds	Comment taken into account in latest draft Local Plan Noted – Supporting text to Bromleys Biodiversity Plan which provides further detail and advice.

Objective/ Policy/ issue	Respondent	Summary of main substance raised in representation	Officer Comment
		<p>Scrub: check for reptiles, especially slow worms, lizards. Also nesting birds Badgers: woodland, sloping ground Where lighting is to be introduced check if the area used by bats. Some species will not tolerate lighting Check areas adjacent to SINCS, allotments or other open land for protected species</p>	
Policy 8.7 – Development and trees	Bromley Biodiversity Partnership	<p>'Forest' trees on development sites e.g. oaks must be given enough space from the buildings so that in future years they do not cause a nuisance to householders (either through root damage or indeed fallen leaves leading to slippery conditions) such that subsequently their removal is asked for Trees and replanting of native spp. 'Native species' are often sourced from abroad and this has led to problems of ash dieback, oak processionary moth etc. which have been brought in from abroad on imported plants. Subsequent remedial action is extremely costly. Therefore suggest insert 'of local provenance' in the sentence starting 'When trees have to be felled, the Council will seek suitable replanting of native'.. so it reads 'When trees have to be felled, the Council will seek suitable replanting of native species of local provenance.' Local provenance should mean that the trees have been grown from seed or cuttings taken from trees grown nearby if possible or at least within Kent or the south-east of England. .</p>	Comment taken into account in latest draft Local Plan
Policy 8.7 – Development and trees	Orpington Field Club	<p>8.7 Trees and replanting of native spp. These need to be sourced locally and not from abroad to avoid problems of ash dieback, oak processionary moth etc. which have been brought in from abroad on imported plants. Therefore suggest insert 'locally provenanced' in the sentence starting 'When trees have to be felled, the Council will seek suitable replanting of native'.. so it reads 'When trees have to be felled, the Council will seek suitable replanting of locally provenanced native species'. Locally provenance should mean that the trees have been grown from seed or cuttings taken from trees grown nearby if possible or at least within Kent or the south-east of England. 8.7 Add, ii On new development sites ensure that 'forest trees' e.g. oaks are given sufficient room so that future householders don't ask for their removal.</p>	As above.
Policy 8.8 – Conservation and management of trees and woodlands	Bromley Biodiversity Partnership	<p>Under 8.8.ii add 'locally provenanced' (see comments under 8.7) so it reads 'encourage appropriate planting of locally provenanced trees in suitable locations' 8.8 add 'iv Promote understanding of the damage done by the dumping of garden rubbish in woodlands and seek to enforce fly tipping regulations on Council owned land.'</p>	Comment taken into account in latest draft Local Plan
Policy 8.8 – Conservation and management of trees and woodlands	Orpington Field Club	<p>8.8 ii tree planting. See comment on locally provenanced native trees in 8.7. Suggest, 'encourage appropriate planting of locally provenanced trees in suitable locations' 8.8 add iv Promote understanding of the damage done by the dumping of garden rubbish in woodlands.</p>	As above.
Policy 8.9 – Hedgerows and development	Bromley Biodiversity Partnership Orpington Field	<p>Hedgerows and Development. Native hedgerow species should be locally provenanced and any removal, like tree felling, should be done during the winter to cause minimum disturbance to nesting birds and other wildlife. In the sentence 'where a hedgerow is to be removed, the Council will, where appropriate, require its</p>	Comment taken into account in latest draft Local Plan

Objective/ Policy/ issue	Respondent	Summary of main substance raised in representation	Officer Comment
	Club	replacement with native hedgerow species'. Insert, 'this should be done during the winter' and 'locally provenanced' so it reads, 'where a hedgerow is to be removed, this should be done during the winter and the Council will, where appropriate, require its replacement with locally provenanced native hedgerow species'	
Policy 8.9 – Hedgerows and development	Orpington Field Club	8.9 Hedgerows and Development. Native hedgerow species should be locally provenanced (see comment 8.7) and any removal, like tree felling, should be done during the winter to cause minimum disturbance to nesting birds and other wildlife. In the sentence 'where a hedgerow is to be removed, the Council will, where appropriate, require its replacement with native hedgerow species'. Insert, 'this should be done during the winter' and 'locally provenanced' so it reads, 'where a hedgerow is to be removed, this should be done during the winter and the Council will, where appropriate, require its replacement with locally provenanced native hedgerow species'	As above.
Policy 8.10 – Kent Downs AONB	The Kent Downs AONB Unit	We have some factual amendments and revised text to better reflect:- the NPPF paragraphs 113,115 and 116, 14 footnote 9 and 10. - The CROW Act 2000 Section 85 Duty of regard - the national guidance and CROW Act wording 'conserve and enhance' (rather than 'protect') - the inclusion of 'the setting' which was covered in the SE Regional Strategy policy on AONBs but has been lost. The quality of the setting of the AONB - the views out from and towards the AONB- was one of the main purposes of designation. - the importance of the adopted Kent Downs AONB Management Plan and its supporting guidance in helping Bromley BC carry out its 'duty of regard' to conserve and enhance the AONB. - Factual changes to the title of the Kent Downs AONB i.e it is not the Kent North Downs AONB. (delete North) The title of the statutory and adopted Management Plan is the Kent Downs AONB Management Plan, (not Strategy) Suggested rewording of the text: The Kent Downs AONB was designated by the Countryside Commission (now Natural England) in 1968. This designation formally recognises the importance of the unique landscape quality in order to conserve and enhance its characteristic natural features, including flora and fauna, and to maintain its natural beauty. Where development proposals are in the Kent Downs AONB or its setting the Council will consult Natural England on proposals considered likely to have a material effect on the landscape, and use the Kent Downs AONB Management Plan and its supporting guidance in all development management decisions. Suggested rewording of the policy: The Kent Downs AONB has the highest status of protection in relation to landscape and scenic beauty. Any development proposals within the AONB and its setting will be required to demonstrate that there is no detrimental impact on the AONB and that conservation and enhancement is achieved through the highest quality of design	Comment taken into account in latest draft Local Plan Noted Amendments include the setting of the AONB.
Policy 8.10 – Kent Downs AONB	Orpington Field Club	Support	Noted.
Policy 8.10 – Kent Downs AONB	SE London Green Chain Working Party	There needs to be a clearer link between design and the landscape within which the development sits. This is touched on in: ii. Positively contribute to the existing street scene and/or landscape and respect important views, skylines, landmarks or landscape features; In supporting text, suggest before the para: There is a need to	Additional text included in supporting paragraphs to reflect the importance of context and the links between design and the natural environment.

Objective/ Policy/ issue	Respondent	Summary of main substance raised in representation	Officer Comment
		encourage local distinctiveness and a sense of place, particularly through the use of vernacular materials. Good modern design can be imaginative and innovative, and will be welcomed in appropriate circumstances where it contributes positively to the surrounding environment. add The borough has two distinct landscape types- the North Downs Dip Slope and South London Pebbly Sands. Development design should be informed and expressed through the natural signature of these predominant landscape types.	
Policy 8.11 – Landscape quality and character	The Kent Downs AONB Unit	Factual amendment- Kent Downs AONB not Kent north downs AONB Support for the policy	Noted. Error to be corrected.
Policy 8.11 – Landscape quality and character	Orpington Field Club	Support	Welcomed.
Policy 8.12 – Green corridors	Robinson Escott Planning	Green Corridors need to be defined on a map so that applicants know whether this policy applies to a particular area of land or not.	Comment taken into account in latest draft Local Plan
Policy 8.12 – Green corridors	Bromley Biodiversity Partnership	Cray Valley Renewal area offers the opportunity to provide an improved green corridor. Care should be taken to avoid light pollution of the waterway because this has a negative impact on bat populations.	Noted.
Policy 8.12 – Green corridors	Orpington Field Club	Support	Welcomed.
Policy 8.12 – Green corridors	SE London Green Chain Working Party	Support	Welcomed.
Policy 8.13 – Biodiversity and Access to nature	Bromley Biodiversity Partnership	Add a third objective iii supporting and promoting the Bromley Biodiversity Action Plan (update currently in draft).	Noted. Latest draft Local Plan includes most up to date information.
Policy 8.13 – Biodiversity and Access to nature	Orpington Field Club	Add iii) Supporting and promoting the Bromley Biodiversity Action Plan (update currently in draft).	Consider additional clause.
Other	Copers Cope Resident's Area Association	A policy on protecting natural heritage (the plan refers only to built heritage) such as Beckenham's heritage tree stock	Policies on the natural environment including trees and hedgerows are included in the Local Plan.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Valued Environments – Sites of Importance for Nature Conservation (SINCs)

10 responses were received – 5 emails/letters and 5 responses online.

Respondent	Summary of issues	Officer comments 2016
London Wildlife Trust	<p>Chapter 5: Living in Bromley:</p> <p>Bromley Civic Centre, Stockwell Close, Bromley</p> <ul style="list-style-type: none"> The inclusion of the area of Urban Open Space and SINC within the development boundary endangers a site of importance for nature conservation. The boundaries should be altered to exclude the SINC to ensure that there is no adverse impact upon it. <p>Bassett's Campus, Broadwater Gardens, Locksbottom</p> <ul style="list-style-type: none"> The inclusion of the area of SINC within the development boundary would endanger species which the site currently. The boundaries should be altered to exclude the SINC. 	<p>(also addressed in site-specific response tables)</p> <p>In both cases, is not the intention that the entire site be developed, both the UOS and SINC designations will be taken into consideration when detailed proposals come forward.</p>
London Wildlife Trust	<p>SINCs review</p> <p>Pleased with the proposed changes to the Sites of Importance for Nature Conservation (SINCs). Welcome and support these proposals, with a few suggested amendments.</p> <ul style="list-style-type: none"> Saltbox Hill & Jewels Wood (M111). The text should match the maps. Crystal Palace Park (ByBI10). Recommend extending the SINC boundaries at include all of the wooded ridge, and the covered reservoir (boundary to run alongside Crystal Palace Parade). Furze Bottom & Higham Hill (ByBI15), recommend that other meadows to south & east are included. Farnborough Recreation Ground (ByL08). Should include the south-eastern strip adjacent to Lovibonds Avenue, which is already managed as a wildlife area <p>There is no M020 (Downe Bank & Cudham Valley North) shown on map 32.</p> <p>They also support the new designations</p> <p>They recommend that reference is made to the fact that the SINC survey of the LB Bromley was undertaken by London Wildlife Trust in 2008, with a smaller survey carried out the following year of remaining sites. They are concerned that the SINC survey data is nearly 8 years old and thus becoming out of date, making it open to challenge and therefore needs to be refreshed.</p> <p>They draw attention to the 2013 advice note of the London Wildlife Sites Board which recommends that ideally a survey of relevant land within the borough should be undertaken</p>	<p>Support for changes welcomed</p> <p>Noted This will be considered when any future plans for the park are proposed.</p> <p>Noted</p> <p>Noted</p> <p>This was a mistake none of the alterations to M020 appear on this page.</p> <p>Noted</p>

Respondent	Summary of issues	Officer comments 2016
	every 5-10 years boundary resulting in recommendations on which sites should be accorded SINC status (and at which grade).	Noted, but, no guarantee can be given regarding the timing of such survey work.
1 individual	<p>Supports new SINCS in Darwin.</p> <p>Considers that woodland to the rear of the properties on the western side of Beechwood Road (part of Ramus Wood) should be included in the designation as it has recently been the subject of planning applications and the designation would give added protection.</p>	<p>Support for changes welcomed</p> <p>The land is in the Green Belt and subject to a Tree Preservation Order. Designating the land as suggested would require an ecological survey which showed that there was something of particular importance from nature conservation viewpoint as justification. It is not sufficient reason to say that a site is of importance for nature conservation without proof in order to protect it from development.</p>
Mrs. Andrea Stevens (Petts Wood & District Residents' Association)	<p>Welcomes the addition of Chislehurst Junction to the list of sites (page 7 Ref: ByBI142) and its designation as a 'New Borough Grade II SINC'.</p> <p>British/Network Rail have stripped out lineside trees and vegetation to the detriment of local wildlife. They hope that this designation will prevent this type of operation and encourage them to consult Bromley Council prior to undertaking this type of work.</p>	<p>Support for changes welcomed.</p> <p>Unless trees are protected by Tree Preservation Orders, there is no requirement for planning permission to be sought, consequently this designation not will not come into play.</p>
1 individual	Cannot find any reference to the SINCS under threat by site allocations at the Bassett's campus, the Civic Centre and Whyte's Woodland in Chislehurst. Given the proposed changes to the land on which these SINCS are, why aren't they included? The damage to the biodiversity value of these sites is not in conformity with the London Plan.	<p>The maps and schedules included in this consultation are to show where changes (new sites or upgrading of sites) are proposed. All other SINC designations will remain as shown on the UDP Proposals map, and will be carried forward to the Local Plan allocations map in due course.</p> <p>The designation of land as a SINC does not prevent development, but the nature interests on the site have to be taken into consideration when proposals are submitted.</p>
1 individual	<p>The new SINCS and the extensions are welcome.</p> <p>Concerned that the scales and presentation of the maps used in this consultation are inadequate for people to comment.</p> <p>ByBI10 Crystal Palace Park: the SINC boundary should be extended to the grass/wood/scrub at the NW of the site adjacent to Crystal Palace parade.</p> <p>ByL08 Farnborough Recreation Ground: the SINC should be extended to include the area adjacent to Lovibonds Avenue.</p> <p>M018 West Kent Golf Course and Down House (part). In the text description for Maps 25 and 26, in the 2nd para, change 'Further west...' to 'Further east...'</p> <p>M021 Norsted Valley Woods: The description text for map 28 should be included for map 32 which shows M021 and not M020 as stated. The site name should also be changed on the</p>	<p>Support for changes welcomed.</p> <p>Noted</p> <p>In the case of all the suggested boundary amendments, without a further ecological survey to show that they are of particular importance from nature conservation, such a recommendation cannot be made. As SINCS can be designated outside the Local Plan process in a similar way to SSSI's, the suggestions will be noted and taken into consideration when such a survey is undertaken.</p> <p>Noted</p>

Respondent	Summary of issues	Officer comments 2016
	<p>text for map 32 to Norsted Valley Woods.</p> <p>M111 Salt Box and Jewels Wood: the extensions shown are shaws but there is no map of the 'two meadows to the west of Salt Box Hill SSSI'. There is an extension to the south of Salt Box - are these the two meadows?</p> <p>Mxxx Mollards Wood and Jerry Reddings Shaw: is this a new Metropolitan Site or is it an extension to M111 Salt Box and Jewels Wood?</p> <p>Langley Nature Reserve: is this a SINC (not stated as such in Section 6 of the Local Plan Consultation document re Langley Park Schools.)? If it is not a SINC, I think it should be given Local SINC designation.</p>	<p>Noted</p> <p>The text is incorrect, it should read "The site is extended to include the two shaws adjoining the Jewels Wood complex that have a similar character to the existing woodland"</p> <p>The table in the document should have stated that this is an 'Upgrade from Borough Grade I to a Metropolitan SINC'. It was part of a Borough Grade I SINC (ByBi13 - Norheads Lane Woodlands), the remainder of which retains its grading</p> <p>This area is already designated as a SINC (Borough Importance Grade 2) on the UDP Proposals map and this will be carried forward.</p>
Mrs Judy Palmer (Bromley Friends of the Earth)	Bassetts Pond, the Civic Centre and Whyte's Woodland in Chislehurst are absent from the schedule. Presumably they are still SINC's and they need to be listed as such. No degradation should occur to any of our protected sites and it is pleasing to note much enhancement to the sites listed.	See comment on issues raised by above.
Mrs Zoe Knight (Downe Residents' Association)	Support the upgrade from Borough Grade II to Borough Grade I in respect of the sites at Bogey Lane, Farthing Street and Orange Court Lane, Downe (ByBI24)	Support for changes welcomed.
1 individual	<p>The SINC extension should be far more expansive and take in the whole of Crystal Palace Park except those parts which are obviously buildings, concrete or tarmac.</p> <p>The UDP 2006 (and before) 'Proposals Map', which also defines specially designated areas, has irrationally excluded large parts of the park.</p> <p>The whole of Betts Park, Anerley Road, is a proposed new local SINC, including large areas of grass and playing field, but much more diverse and interesting habitat in CPP is excluded. I consider it has been excluded on the hilltop ridge because Bromley Council has had lucrative development aspirations there since the 1990 Crystal Palace Act. The whole area within the Land Registry defined registered park boundaries should be designated a SINC, with the exception of the barren man-made surfaces mentioned.</p> <p>Nine specific areas are listed which should be included in this designation</p>	In the case of all the suggested boundary amendments, without a further ecological survey to show that they are of particular importance from nature conservation, such a recommendation cannot be made. As SINC's can be designated outside the Local Plan process in a similar way to SSSI's, the suggestions will be noted and taken into consideration when such a survey is undertaken.

Respondent	Summary of issues	Officer comments 2016
<p>Dr Judith John, Orpington Field Club</p>	<p>The new SINCs and the extensions are welcome.</p> <p>Concerned that the scales and presentation of the maps used in this consultation are inadequate for people to comment.</p> <p>ByL08 Farnborough Recreation Ground: it should also include the south-eastern strip adjacent to Lovibonds Avenue, north of allotments, and managed as a wildlife area by the Friends of Tugmutton Common.</p> <p>ByBI15, Furze Bottom & Higham Hill, Map P.19, they point out that other meadows to south & east (on the west facing side of the valley) also support semi-improved chalk grassland and suggest their inclusion in the SINC.</p> <p>M018: OFC members welcome & fully support all additions & extensions to this Site of Metropolitan Importance, not only because of its flora and fauna but also because many of the plant species and some of the animals here were studied and described by Charles Darwin in this location.</p> <p>M111: Maps Pages 29 & 30: Extension to Metropolitan SINC: Saltbox Hill & Jewels Wood (in part) text says 'extended to include 2 meadows west of Saltbox Hill' but maps only show hedgerow extensions to the west. These hedgerows should be mentioned in the text & the meadows should be added to the maps. A meadow has been added to the south.</p> <p>Mxxx Map P.33 Mollards Wood & Jerry Riddings Shaw. Is this an extension to Metropolitan SINC M111 (Saltbox Hill & Jewels Wood)?</p> <p>Surprised to See Langley Nature Reserve (east of South Eden Park Road) missing from list of SINCs, or was it designated before? It is south of Unicorn Primary School & north of Langley Park School for boys and is managed under a Higher Level Stewardship Agreement, funded by Natural England (DEFRA).</p> <p>ByBI10 Crystal Palace Park: the SINC boundary should be extended to the grass/wood/scrub at the NW of the site adjacent to Crystal Palace parade. This area is good for birds including those on migration using the ridge of the Great North Wood as a migration route.</p>	<p>Support for changes welcomed</p> <p>Noted</p> <p>In the case of all the suggested boundary amendments, without a further ecological survey to show that they are of particular importance from nature conservation, such a recommendation cannot be made. As SINCs can be designated outside the Local Plan process in a similar way to SSSI's, the suggestions will be noted and taken into consideration when such a survey is undertaken.</p> <p>See comments above.</p> <p>See comments above.</p> <p>See comments above.</p> <p>See comments above.</p>
<p>Cllr Vanessa Allen, Bromley Labour Group</p>	<p>Proposals are supported and generally welcomed.</p> <p>An address or at least post code for each site would be very useful, it's difficult to find the location of some of the sites.</p> <p>Sites with no public access – have there been or are there planned any efforts to provide public access to some of the sites without it, where possible?</p>	<p>Support for changes welcomed.</p> <p>Noted</p> <p>The designation essential identifies sites which have importance for nature conservation to ensure that when a planning application is submitted the nature interests can be taken into consideration. Like any other open space</p>

Respondent	Summary of issues	Officer comments 2016
	<p data-bbox="315 284 663 316">How are the sites monitored?</p> <p data-bbox="315 533 842 564">What action can be taken if breaches occur?</p> <p data-bbox="315 719 1379 778">Sites ByB101, ByB1120, M143, ByB124 – field edges – how practical is it to protect these. Impact of farming on adjacent land e.g. livestock, use of chemicals?</p> <p data-bbox="315 810 1395 869">Site ByLO4 – states grass is intensively mown, is this adversely affecting the site? Can it be stopped if so?</p> <p data-bbox="315 901 992 933">Sites ByB1138 – text is missing at the ends of sentences.</p>	<p data-bbox="1429 134 2136 220">designation there is no intention to make land designated as such accessible to the public, the land defined is to show where the associated Local Plan policy should be applied.</p> <p data-bbox="1429 288 2119 375">There is no set timetable for monitoring as this is a sizable Borough and a full survey would be a substantial lengthy project.</p> <p data-bbox="1429 411 2128 497">In their Advice Note (2013) the London Wildlife Sites Board say a survey should ideally be undertaken every 5-10 years.</p> <p data-bbox="1429 534 2119 684">If a development which required planning permission were to take place on a site so designated, the Council could take enforcement action, but as with any other case where development not requiring permission takes place, no cation could be taken.</p> <p data-bbox="1429 721 1805 753">See response to previous issue.</p> <p data-bbox="1429 842 1805 874">See response to previous issue.</p> <p data-bbox="1429 906 2085 992">The final sentence should have read “There is no public access to the site but it can be viewed from the nearby Chelsfield Station.”</p>

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Valued environments – Trees and hedgerows

Policy	Respondent	Summary of issues	Officer comment
Policy 8.7 – Development and trees	Bromley Biodiversity Partnership	'Forest' trees on development sites e.g. oaks must be given enough space from the buildings so that in future years they do not cause a nuisance to householders (e.g. root damage, fallen leaves leading to slippery conditions) such that subsequently their removal is asked for Trees and replanting of native spp. 'Native species' are often sourced from abroad and this has led to problems of ash dieback, oak processionary moth etc. which have been brought in from abroad on imported plants. Subsequent remedial action is extremely costly. Therefore suggest insert 'of local provenance' in sentence starting 'When trees have to be felled, the Council will seek suitable replanting of native'.. so it reads 'When trees have to be felled, the Council will seek suitable replanting of native species of local provenance.' Local provenance should mean trees grown from seed or cuttings taken from trees grown nearby or within Kent or south-east of England. .	Change not recommended due to the difficulty in enforcing such a requirement
Policy 8.7 – Development and trees	Orpington Field Club	8.7 Trees and replanting of native spp. Need to be sourced locally and not from abroad to avoid problems of ash dieback, oak processionary moth etc. which have been brought in from abroad on imported plants. Suggest insert 'locally provenanced' in sentence starting 'When trees have to be felled, the Council will seek suitable replanting of native'.. so it reads 'When trees have to be felled, the Council will seek suitable replanting of locally provenanced native species'. Locally provenance should mean grown from seed or cuttings taken from trees grown nearby or within Kent or south-east of England. 8.7 Add, ii On new development sites ensure that 'forest trees' e.g. oaks are given sufficient room so that future householders don't ask for their removal.	As above.
Policy 8.8 – Conservation and management of trees and woodlands	Bromley Biodiversity Partnership	Under 8.8.ii add 'locally provenanced' (see comments under 8.7) so it reads 'encourage appropriate planting of locally provenanced trees in suitable locations' 8.8 add 'iv Promote understanding of the damage done by the dumping of garden rubbish in woodlands and seek to enforce fly tipping regulations on Council owned land.'	As above
Policy 8.8 – Conservation and management of trees and woodlands	Orpington Field Club	8.8 ii tree planting. See comment on locally provenanced native trees in 8.7. Suggest, 'encourage appropriate planting of locally provenanced trees in suitable locations' 8.8 add iv Promote understanding of the damage done by the dumping of garden rubbish in woodlands.	As above
Policy 8.9 – Hedgerows and development	Bromley Biodiversity Partnership Orpington Field Club	Hedgerows and Development. Native hedgerow species should be locally provenanced and any removal, like tree felling, should be done during winter to cause minimum disturbance to nesting birds and other wildlife. In sentence 'where a hedgerow is to be removed, the Council will, where appropriate, require its replacement with native hedgerow species'. Insert, 'this should be done during the winter' and 'locally provenanced' so it reads, 'where a hedgerow is to be removed, this should be done during the winter and the Council will, where appropriate, require its replacement with locally provenanced native hedgerow species'	Change not recommended. The standard condition attached to this policy (which will continue for the Local Plan) covers the planting period for replacement trees, i.e. "the next planting season".
Policy 8.9 – Hedgerows and	Orpington Field Club	8.9 Hedgerows and Development. Native hedgerow species should be locally provenanced (see comment 8.7) and any removal, like tree felling, should be done during the winter to cause minimum disturbance to nesting birds and other wildlife. In the sentence 'where a hedgerow is to be removed,	As above

development		the Council will, where appropriate, require its replacement with native hedgerow species'. Insert, 'this should be done during the winter' and 'locally provenanced' so it reads, 'where a hedgerow is to be removed, this should be done during the winter and the Council will, where appropriate, require its replacement with locally provenanced native hedgerow species'	
Policy 8.38 Trees in Conservation Areas	Bromley Biodiversity Partnership and Orpington Field Club	For the reasons given in the comment on Policy 8.7, clause iii should be amended to read 'one or more appropriate replacement trees of a native, locally provenanced species will be sought...'	As above

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Valued Environments – Open Space

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Policy 8.15 Metropolitan Open Land	Crystal Palace Triangle Planning Group	Support	Welcomed
Policy 8.16 Dwellings in the Green Belt or on Metropolitan Open Land	Robinson Escott Planning	No restriction is set to limit extensions to existing dwellings to 10% increase in floor area in the NPPF. Depending on the circumstances of each individual proposal, a larger extension may not be disproportionate to the original dwelling house. Criterion (i) should be amended to reflect the NPPF.	Noted, however as the NPPF does not define 'disproportionate', it is reasonable for a local authority to set some parameters, this does not prevent an applicant putting forward a case for 'very special circumstances' to demonstrate why exceptions should be made.
Policy 8.16 Dwellings in the Green Belt or on Metropolitan Open Land	Orpington Field Club	Support	Welcomed
Policy 8.17 Replacement Residential Dwellings in the Green Belt	Robinson Escott Planning	Garaging should only be incorporated into a floor space calculation if the dwelling to be demolished also involves demolition of garaging so that there is, therefore, a like for like comparison. An owner's rights under permitted development to erect outbuildings including garages should not be held against them. Similarly, accommodation below ground would not necessarily harm the openness of the Green Belt or the purposes of including land within it. Criterion (i) should be amended, therefore, to be consistent with the fourth bullet point of paragraph 89 of the NPPF. Also the reference to 10% should be deleted. Whether a proposal is 'materially larger' will involve a matter of judgement dependent on the facts, circumstances and impact in each case.	Noted, but it is not considered that the policy as currently worded is at variance with the NPPF.
Policy 8.17 Replacement Residential Dwellings in the Green Belt	Orpington Field Club	Support	Welcomed
Policy 8.18 Land Adjoining Green Belt Or Metropolitan Open Land	Robinson Escott Planning	There is no such test in the NPPF.	There is nothing in the NPPF which says a local authority cannot have such a policy to prevent built development taking place right against the urban rural boundary where it might have a detrimental effect on the openness of such important open spaces.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Policy 8.18 Land Adjoining Green Belt Or Metropolitan Open Land	Montagu Evans LLP	We appreciate land adjoining Green Belt or Metropolitan Open Land needs to ensure development proposals have no detrimental effect on the visual amenity, character or nature conservation value of the adjacent designated area. It is important to take into account developing appropriate and vacant sites adjoining the Green Belt or Metropolitan Open Land is a sustainable approach to growth in the Borough. Generally we agree with the aims of 8.18: Land Adjoining Green Belt or Metropolitan Open Land.	Welcomed
Policy 8.18 Land Adjoining Green Belt Or Metropolitan Open Land	1 individual	I prefer the UDP(2006) policy G6 wording 'will not be permitted if' to the weaker proposed 'should ensure that' [... no detrimental effect ...]	Noted
Policy 8.18 Land Adjoining Green Belt Or Metropolitan Open Land	Green Chain Working Party	Should be reworded to include Green Chain designation for clarity (as not all MOL in Bromley is designated as Green Chain) i.e. to "..... either the Green Belt, Green Chain or Metropolitan Open Land (MOL).	True, not all MOL land in Bromley is Green Chain, however all Green Chain land is, consequently all Green Chain Land is subject to this policy.
Policy 8.18 Land Adjoining Green Belt Or Metropolitan Open Land	Orpington Field Club	Support	Welcomed
Policy 8.19 South East London Green Chain	Bromley Biodiversity Partnership and Orpington Field Club	As per comment on 8.7 re local provenance of trees/bushes: 8.19 South-east London Green Chain Line 4 'in appropriate areas the planting of native vegetation' insert 'locally provenanced' so it reads 'in appropriate areas the planting of locally provenanced native vegetation....'	Noted
Policy 8.19 South East London Green Chain	Green Chain Working Party	Support	Welcomed
Policy 8.20 Urban Open Space	Orpington Field Club	Support	Welcomed
Policy 8.20 Urban Open Space	Robinson Escott Planning	The policy should also include reference to the benefits that would accrue from the provision of new housing as well as new recreational or employment opportunities which may result from a scheme.	Noted
Policy 8.20 Urban Open Space	Montagu Evans LLP	Given the circumstances in which proposals would be permitted were set out before the introduction of the NPPF and the London Plan we consider these to not align with the principles of national and regional policy. The policy remains restrictive with regards to the permitted circumstances for built development proposals. Other considerations should apply particularly in respect of surrounding uses to the UOS allocation. We consider there should be more scope to allow a wider range of complementary uses having regard to current identified needs over	Noted

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
		<p>the Plan period rather than focus on those historical uses identified for which there might be limited demand. It is also important that policy clearly identifies the tests against which impact on UOS should be assessed.</p>	
Policy 8.20 Urban Open Space	Nathaniel Lichfield & Partners	<p>Intu recognises the important contribution that protected Urban Open Space (UOS) can make to the community. It is important that this policy is consistent with the BTCAAP and in particular Policy 'OSM Queens Gardens', which anticipates new cafes and restaurants around the edge of Queens Garden, provided that the development does not result in the loss of any green space accepting that landscaping may be required to minimise the impact of the development. Intu object to this policy in its current form because it currently conflicts with BTCAAP Policy 'OSM Queens Gardens'.</p>	<p>The UOS designation does not encroach on any part of the former 'Glades' complex and it is the Council's intention that the designation (which covers the area of the original Gardens) should be protected from development.</p>
Policy 8.20 Urban Open Space	The JTS Partnership LLP	<p>Incorporating the word “additional” within the final paragraph of the policy (first line) is too restrictive, and should be deleted. There should be greater flexibility, given the National Planning Policy Framework’s encouragement to support the creation of new schools and new school development.</p> <p>Furthermore, there should be fourth criteria within the Policy text and the following is suggested:</p> <p>“IV. The development makes the provision of other social infrastructure, such as school buildings or other community facilities”</p>	Noted
Policy 8.20 Urban Open Space	1 individual	<p>Please keep the generality of the UDP (2006) policy G8 final clause wording to that proposed here i.e. No special exception for educational development – the protection should apply equally to all proposed development.</p>	Noted

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Valued Environments –Heritage Assets

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Introduction	English Heritage	Recommend that a fuller account of the NPPF is provided rather than just the four bullet points.	The introduction will be rewritten for the Draft Plan and the adopted plan, amendment may not be relevant.
Strategic Context	English Heritage	Expand text on P11 to provide a broader summary of distinctive character, encompassing the contribution of the Borough's heritage assets.	No amendment recommended. Wording considered adequate.
Vision p15, para 1	English Heritage	Add reference to "historic environments" in Para 1.	Reference added.
Vision p15, para 3	English Heritage	Revise para 3 to read "The protection and enhancement of conservation areas, and other heritage assets is achieved, including highly significant heritage assets of Down House, Crystal Palace and Biggin Hill. Quality in the built environment contributes to civic pride and wellbeing, with new development integrated and responding to local character"	No amendment recommended. Wording considered adequate.
Vision p15, para 3	English Heritage	Replace "historic assets" with "heritage assets"	Text amended.
Objectives, Built Heritage	English Heritage	Bullet 1 – change to read "conserve and enhance" rather than protect.	Text amended.
Objectives, Built Heritage	English Heritage	Bullet 2 – reword to align with NPPF, "ensure development complements and responds to local character, and the significance of heritage assets, including their settings"	Text amended.
Objectives, Built Heritage	English Heritage	Bullet 4 – reword to include reference to <i>monitoring</i>	Comment taken into account in latest draft Local Plan, Monitoring and Implementation
Chapter 8	English Heritage	Consider re-ordering the policies. Policy 8.1 General Design would be better placed before built environment/ heritage policies.	Order of policies updated in latest draft Local Plan
Policy 8.1 general design	English Heritage	Consider using NPPF wording – developments "respond to local character and history" and reflect "local identity" based on an understanding and evaluation of an area's characteristics. Suggest explicit reference to how development should relate positively to the historic environment. Amend part (ii) to read "...landmarks, landscape features or <i>heritage assets</i> "	Amended clause ii to include "heritage assets"
Heritage Assets, P118	English Heritage	Effective expression of a positive strategy for the historic environment is needed in the Plan. A strategy should encompass the steps that the Council will be taking to conserve and enhance heritage assets taking forward the vision and objectives.	No amendment recommended, broad approach considered adequate.
Heritage Assets, P118	English Heritage	Welcome preparation of a Characterisation Report. This could be further developed to provide analysis of particular issues facing the Borough's heritage.	Noted.
Heritage Assets, P118		Crystal Palace, Biggin Hill and the significance of Down House and the Tentative World Heritage Site should be highlighted and referred to in the Plan.	Crystal Palace and Biggin Hill SOLDC policies refer to heritage significance. Text added about the tentative World Heritage Site.
Heritage Assets,	English Heritage	Would like to see tall buildings addressed with the identification of areas in the	Noted.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
P118		Borough as inappropriate, sensitive to or appropriate for such development.	
Policy 8.33 to 8.41	English Heritage	Suggest wording is adjusted to reflect terms used in NPPF. Avoid direct reference to NPPF in the policy itself.	No amendment recommended. Referring to the NPPF avoids unnecessary repetition.
Policy 8.33 – Statutorily Listed Buildings	The Beckenham Society	Data on Listed Buildings should be available on the Council's website	A map showing listed buildings is now available on the Bromley Council website. Details about the assets are found on Historic England's website.
Policy 8.33 – Statutorily Listed Buildings	Montagu Evans for London Square	Hayes Court, Hayes – we support the aims set out on 8.33: Statutory Listed Buildings. In particular the change of use of listed buildings to be used for the purpose for which they were built for. As well as judging harm the development may cause against the relevant test in the NPPF, we also consider it imperative to evaluate development involving a statutory listed building on the benefits it will create. This would be carried out on a site specific basis and by including other material considerations to ensure a balanced judgement of any proposals involving a listed building.	Noted.
Policy 8.33 Statutory Listed Buildings	1 individual	If the NPPF does not offer equal or greater protection to the current UDP policies, especially regarding threats to demolish – then I suggest retaining UDP(2006) policies BE8 and BE9	No amendment recommended. Draft policies in line with NPPF and considered appropriate.
Policy 8.34 – Locally listed Buildings	The Beckenham Society	Add reference to inclusion of an appendix of listed buildings	Not advised because the list changes during the life of the plan. A map is now available on Bromley Council's website.
Policy 8.34 & 8.35 – Locally Listed Buildings, non-designated assets	Robinson Escott	The wording at the end of both of these policies does not make sense.	Wording of policies has been amended.
Policy 8.36 – Conservation Areas	Robinson Escott	The last part of the policy does not reflect the guidance at Paragraph 134 of the NPPF. The policy should be reworded, therefore.	The condition is necessary to ensure a satisfactory outcome and the policy is considered to reflect the NPPF.
Policy 8.36 – Conservation Areas	Montagu Evans for London Square	We agree with the expectations set out in 8.36: Conservation Areas for proposals involving new development in Conservation Areas.	Noted.
Policy 8.36 Conservation Areas	1 individual	The 'conserve and enhance' phrase should not merely be an explanation of the creation of a conservation area but central to proposed development in its lifetime. The requirement for proposals to 'conserve and enhance' the CA should be policy text – in the main body or as a first clause. The policy should also address and prevent partial and multi-stage demolition.	Amended sentence before three clauses to include "preserve and enhance" as the outcome. This is covered by the GPDO and policy cannot counteract those provisions.
Policy 8.40 –	English Heritage	Significance of Down House would merit particular reference in the supporting	Text referring to the tentative World

Objective/ Policy/ issue	Respondent	Summary of issues	Officer comment
Historic Parks and Gardens		text.	Heritage Site including Down House will be included.
Policy 8.41 – Ancient Monuments and Archaeology	English Heritage	The Greater London Archaeology Advisory Service can provide further advice with regard to this policy and any specific site allocations.	Noted. GLAA to be consulted.
Policy 8.41 – Ancient Monuments and Archaeology	The Beckenham Society	The Roman Road running through Beckenham and other sites demonstrated on the 1994 UDP proposals map should be included in the list.	No amendment recommended.
Policy 8.42 – Tall and Large Buildings	English Heritage	Support reference to Joint English Heritage/ CABE Guidance. The evidence base should be augmented by further analysis to provide mapping or locational criteria that will be applied to such proposals.	Reference to guidance to be amended to ensure latest guidance taken into account.
Policy 8.42 – Tall and Large Buildings	West Beckenham Residents Association	The sections 8.42 (tall buildings) and 8.43 (skyline) need substantial strengthening. There should be additional points about not adding to height of existing buildings where they are already, or would become, out of keeping with their surroundings. In Elmers End the one tall building (previously Maunsell offices) that was already out of character with the surrounding traditional family housing was allowed, on appeal, to increase the height by a further two storeys. A strong planning policy on adding to already tall buildings would have assisted the council to win this appeal.	Noted. No amendment recommended. General Design policy includes provision for building height in general.
Policy 8.42 – Tall and Large Buildings	GLA	Welcome introduction of the tall buildings policy.	Support welcomed.
Policy 8.43 – views and skyline	Mr Tony Allen, The Chislehurst Society	The most common issue affecting local views is the unchecked tree growth. This is particularly important in areas of the Walden Recreation Ground, where the view northwards towards London and Canary Wharf is compromised by unmanaged tree growth. Similarly, in parts of Chislehurst Common (particularly around important monuments) effective tree management should be allowed and indeed supported, to restrict unhampered tree growth that harms important local views.	The policy allows for a level of flexibility in assessing applications made to protected trees. Inappropriate works will be opposed by the Council, unless sufficient justification can be supplied in support of proposals. The policy does not prevent good arboricultural management from taking place, however, ensures only necessary management is permitted.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Valued Environments – Areas of Special Residential Character (ASRC)

Proposal at the time of the 2015 Draft Allocations, Further Policies and Designation:

- Take the Draft Revised ASRC Policy forward as part of the Local Plan
- Retain the boundary of the existing Bickley ASRC
- Designate Marlings Park and Chelsfield Park Estates as defined in the 2015 Local Plan consultation document as ASRCs together with their supporting descriptions.
- Do not take forward “The Drive/The Crescent/Church Avenue/Rectory Road “as an ASRC
- Include a revised description of the Petts Wood ASRC based on the **“Supplement to the Description of the Petts Wood ASRC” provided by Petts Wood and District Residents Association as the description of the Petts Wood ASRC**
- **Take parts of the area proposed as ASRCs by the Knoll and Copers Cope Residents Association in Copers Cope and Petts Wood and Knoll Wars forward as part of the Local Plan.**

23 responses were received –1 letter, 9 emails, 13 online comments, 1 petition

Respondent	Summary of issues	Officer comment
Historic England (HE)	<p>Principle of the ASRC designation</p> <p>HE: Supports the development of ASRCs</p> <p>Requires clarification on whether any of the areas identified and assessed were considered against Historic England’s Guidance On Conservation Area Designation And Management and are of sufficient merit to be designated as Conservation Areas.</p>	<p>Noted.</p> <p>Noted. Areas of Special Residential Character are distinct from Conservation Areas in that their value resides in in the area’s “special and distinctive qualities” –, combined with their “readily identifiable characteristics”, rather than in their historic significance. One of the areas assessed as a potential ASRC, The Drive/The Crescent/Church Avenue/Rectory Road” (Beckenham) was assessed for conservation area status in 2013 and the “Beckenham Town Centre Character and Appearance Assessment” agreed by committee concluded that it was not worthy of the status.</p>
London Borough of Croydon	<p>LBC: Concern that the Areas of Special Residential Character designation will unduly constrain development (particularly housing) with a potential impact on Croydon as it appears to be based on areas with a uniform character rather than any specific reason for protection such as intrinsic heritage or townscape value.</p>	<p>Concern Noted. The purpose of the ASRC designation is to enable new development to respect, enhance and strenghten their special and distinctive qualities rather than constrain development.</p>
4 individuals	<p>Other general comments</p> <p>Retention of Appendix 1 of the 2006 UDP ASRC statement is needed in order to maintain the quality & environment of all of the Borough's ASRCs.</p> <p>All of Bromley should be designated as an ASRC so that poorer areas are also protected.</p>	<p>Consideration will be given to updating the UDP’s guidelines which supplement the adopted UDP ASRC policy as part of the Local Plan’s Character and Design SPD.</p> <p>Noted. A borough wide designation of all residential areas as an ASRC would undermine the designation. Areas proposed for designation as ASRCs are required to meet the UDP criteria <u>as amended</u>, set out in the 2015 summer Local Plan</p>

	Orpington High Street's Conservation Area should be protected.	consultation document. Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance. ASRC designation cannot address concerns regarding Conservation Areas which is own planning designation. Conservation Areas are protected from inappropriate development through corresponding UDP and emerging Local Plan policies.
2 individuals	Bickley ASRC Possible Extension Support to designation of the existing area as an ASRC	Noted- Existing Area to be retained.
3 individuals	Marlings Park Estate Proposed ASRC Support to the designation of the area as an ASRC	Noted
6 individuals	Chelsfield Park Proposed ASRC Support to the designation Extend the area westward to include Green Street Green Mention that the SINC contains species rich grassland in the ASRC description	Noted The "Potential Areas of Special Residential Character, Spatial Character Assessments" supporting Background Paper to the proposed designation explains in paragraph 3.1.15 that the eastern boundary of the proposed Chelsfield Park ASRC is defensible by virtue of the change in the spatial standards of the properties to the west of Julian Road and of the buffer area/boundary created by large areas of greenbelt. As such, it is not considered appropriate to extend the area of the proposed ASRC to Green Street Green which is located some 500 metres west of the existing boundary. Sufficient description of SINC included in "SINC Review Document" which supports Draft Allocations, Further Policies and Designations 2015 consultation document to refer to wildlife present on SINC in order for the Local Plan SINC policies to provide a protection to its wildlife features commensurate to the purpose of the designation.
Petts Wood and District Residents Association	Supplement to the Description of the Petts Wood ASRC in Appendix One of the UDP Minor changes suggested to the wording of the ASRC description for factual accuracy Remove permitted development rights to the roof elevations and frontages of properties Add a statement about the cumulative impact of small extensions/changes to the character of the ASRC Add reference to resisting inadequate proposals in the ASRC within the Petts Wood ASRC description	Noted. The wording of the Petts Wood ASRC description has been amended to improve factual accuracy. The ASRC policy provides additional protection to the special and distinctive qualities of ASRCs. Permitted development rights can only be removed through a process separate from the Local Plan. Consideration will be given to addressing the cumulative impact of small scale development on the character of the ASRC and other areas as part of the Character and Design SPD. The aim of the description of the ASRC is to set out the "special and distinctive qualities" of the areas which qualify as ASRCs rather than the mechanism through which these qualities will be provided additional protection. These qualities are protected through the ASRC policy.
	The Drive/The Crescent/Church Avenue/Rectory Road	

<p>Central Beckenham Residents Association (CBRA)</p>	<p>proposed ASRC</p> <p>CBRA: Disagree with the decision not to create the ASRC.</p> <p>This area should be designated as a Conservation Area.</p>	<p>Noted</p> <p>The process followed to assess whether areas qualify as Conservation Areas is distinct from that which is used to assess whether the Areas of Special Residential Character meet the UDP criteria for designation, <u>as amended</u>, included as part of the 2015 autumn consultation. The area proposed as an ASRC was assessed for Conservation Area status in 2013 and the “Beckenham Town Centre Character and Appearance Assessment” agreed by committee concluded that The Drive area was not worthy of the status. Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance.</p>
<p>Knoll House Residents Association (KHRA)</p>	<p>KHRA: Considers proposed area does meet the UDP criteria for designation and urges the Council to reconsider its recommendations.</p>	<p>Areas are required to meet all of the UDP criteria including the UDP criteria ii. <u>as amended</u> included as part of the 2015 autumn consultation: “<i>The majority of properties should have the same readily identifiable characteristics (e.g. spatial standards, similar materials, well landscaped frontages) contributing to the area’s special and distinctive qualities</i>”. As stated in the description, it is considered that in spite of the 1930s style of the properties, these have been too altered to be of a “special quality” and that they do not display the environmental amenities which would be expected of an area to qualify as an Area of Special Residential Character.</p>
<p>1 individual</p>	<p>Criticisms made to the area may apply to Chancery Lane and Limes Road Conservation Areas which have known development in the past year and are also small scale</p> <p>CBRA & KHRA: Concern regarding the accuracy of some of the pictures included as part of the “Potential Areas of Special Residential Character – Spatial Character Assessment” Background Document included as a supporting document to the September 2015 consultation.</p> <p>Concern regarding the preservation of the special qualities of the properties in the area</p> <p>CBRA: Houses included in the ASRC are of a unique style in Bromley, which can be restored.</p> <p>KHRA: The properties have a unique “Derby” architectural style which deserves protection, as well as lengthy rear gardens.</p>	<p>The process for assessing whether areas qualify as Conservation Areas is distinct from that which is used to assess whether proposed Areas of Special Residential Character meet the UDP criteria, <u>as amended</u>, for designation.</p> <p>Noted. Factual errors to be corrected.</p> <p>Noted. Areas are required to meet UDP criteria ii as amended: “<i>The majority of properties should have the same readily identifiable characteristics (e.g. spatial standards, similar materials, well landscaped frontages) contributing to the area’s special and distinctive qualities</i>” to be designated as ASRCs. As stated in the description, it is considered that in spite of the 1930s style of the properties, these have been too altered and do not display the environmental amenities which would be expected for the area to qualify as an Area of Special Residential Character. The historic significance of an area would not necessarily form part of the case for the designation of an ASRC (i.e. ASRCs are not sub Conservation Areas). Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will</p>

	<p>Individual: The area should have been included in the main body of the 2015 consultation document with a specific question and an opportunity for support.</p> <p>The area should have been designated as an ASRC and should be protected from unsympathetic and out of scale development, framing and protecting an approach to Beckenham Conservation Area.</p>	<p>provide supplementary guidance.</p> <p>Whilst the level of support secured in favour of designating an area as an ASRC is an important trigger in assessing whether it meets the criteria for designation, the overriding consideration in designating an area as an ASRC is that it demonstrably meets all of the UDP criteria, <u>as amended</u> set out in the 2015 Local Plan consultation document. The assessment produced with the 2015 local plan consultation shows that it is not considered that the area meets the criteria for designation. As such, it was not considered appropriate to require further support to the designation.</p> <p>Noted. Whilst it is not considered that the areas meets the criteria for the designation of ASRCs, Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance.</p>
<p>Petition from the Knoll Rise Residents Association</p>	<p>New proposed ASRC: The Knolls, Orpington</p> <p>Concern about overdevelopment in the Knoll area affecting the character of the area</p> <p>The area proposed for designation is as deserving as that of the adjacent Petts Wood ASRC</p> <p>A petition was issued in the Knoll Residents' Area newsletter late April/early May 2015: based on petition results, the boundary of the proposed Knoll ASRC was drawn where the most support from residents was obtained (60% total), an area which is also stated to best meet the UDP designation criteria.</p>	<p>Noted. Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance.</p> <p>Each area proposed for designation as an ASRC has been assessed on its own merit against the UDP criteria <u>as amended</u>, set out in the 2015 Local Plan consultation document.</p> <p>Whilst it is stated that the area meets the designation criteria for ASRCs as set out the UDP, areas proposed for designation as ASRCs are required to meet the UDP criteria <u>as amended</u> set out in the 2015 Local Plan consultation document.</p> <p>Whilst the level of support secured in favour of designating an area as an ASRC is an important trigger in assessing whether it meets the criteria for designation, the overriding consideration in designating an area as an ASRC is that it demonstrably meets all of the UDP criteria, <u>as amended</u> set out in the 2015 Local Plan consultation document.</p> <p>Part of the proposed area is recommended for designation as an ASRC.</p>
<p>North Copers Cope Action Group</p>	<p>New Proposed ASRC: Copers Cope North</p> <p>It is requested to designate the area comprising all houses facing the street between the Copers Cope Conservation Area and Worsley Bridge Road.</p> <p>Concern about repeated applications to demolish family dwelling and replace them with large blocks of apartments which if approved could lead to a loss of the area's character.</p>	<p>Noted. Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance.</p> <p>Noted. The overriding consideration in providing an area with the ASRC designation is whether it meets the UDP criteria for designation, <u>as amended</u>, set out in the 2015 Local Plan consultation document.</p>

	<p>Applications have been refused by the Council's Committee and appeals dismissed by the secretary of state demonstrating the positive qualities of the proposed area.</p> <p>The North Copers Cope Action Group sets out the case that the area proposed for designation meets the UDP criteria for the designation of ASRCs by providing quotes from the appeal decisions of inspectors relating to development which was refused in the area.</p> <p>The Copers Cope North Action Group is happy to discuss minor alterations to the proposal.</p>	<p>Part of the proposed area is recommended for designation as an ASRC.</p>
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**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

WORKING IN BROMLEY

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Working in Bromley – General

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Spatial Strategy - Strategic Economic Growth Areas	Jones Lang Lasalle for Legal and General Assurance Society Ltd (Crayfields Business Park)	This strategic policy aspiration is supported but in line with the latter half of the policy in order to improve offer for local businesses, and to ensure the viability of employment sites moving forward, flexibility must be allowed in respect to the type of uses which can be accommodated on them.	Comment noted.
Vision and objectives	Jones Lang Lasalle for Legal and General Assurance Society Ltd (Crayfields Business Park)	Council should ensure that its policies are not overly prescriptive as this is likely to hinder rather than support economic development, particularly in these difficult economic times. Proposals for retail warehousing or other commercial uses should be considered on their own merits and allowed when in appropriate locations. This flexibility should be applied to existing Business Areas such as the land owned by Legal and General Assurance Society Limited at Crayfields, for a variety of uses to provide employment generating floorspace, as well as other service functions such as crèche's or health facilities.	Further work has been carried out and this has been reflected in proposals brought forward in the 2015 Draft Allocations, Further Policies and Designations (DAFPD) document and retained in the latest draft Local Plan.
Spatial Strategy	Montagu Evans for London Square	We support directing the Borough's office-based businesses within Bromley Town Centre as the main location to accommodate such development. We object to the recommendation of protecting existing employment sites or premises that are suitable existing office locations outside town centres. There is no criteria set out to determine the suitability of employment sites outside town centres; therefore this restricts the redevelopment potential of employment sites outside town centres where alternative uses could be deemed more appropriate.	A significant amount of office space in Bromley has been lost to change of use from office (Class B1(a)) to residential (Class C3) permitted development since 2013. This has greatly reduced office stock and has contributed to housing need. Given the loss of office, areas of good quality stock in accessible locations should be retained to help support economic growth and this has been reflected in the draft policy for Office Clusters.
Policy 9.1 – Strategic Economic Growth	1 individual	Crystal Palace is also an area of strategic economic growth. Bromley repeatedly fails to give enough attention to this extremity of it's boundary, and the lack of co-ordination with the three/four adjoining Boroughs is a hindrance to the economic development that is occurring INSPITE of the lack of support and coordinated planning from Bromley.	Crystal Palace was included as a new proposed designation in the DAFPd document and retained in the latest draft Local Plan to reflect its inclusion as a SOLDC in London Plan policy 2.16.
Policy 9.1 – Strategic Economic Growth	1 individual	There are transport implications for this policy - traffic must be directed away from the B265 and onto the A233.	The LBB have undertaken traffic studies on both the Keston Mark Junction (in conjunction with TfL) and the A233 to identify improvement schemes in preparation for the potential impacts of the SOLDC. The LBB has taking findings into account to the produce a draft Infrastructure Delivery Plan (IDP) in conjunction with the draft

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
			Local Plan. The IDP identifies and prioritises specific upgrades in line with growth anticipated out of the draft Local Plan policies and designations.
Policy 9.1 – Strategic Economic Growth	Greater London Authority (GLA)	Should include Crystal Palace as a SOLDC (as per the FALP).	Crystal Palace was included as a new proposed designation in the DAFFD document and retained in the latest draft Local Plan to reflect its inclusion as a SOLDC in London Plan policy 2.16.
Policy 9.1 – Strategic Economic Growth	Highways Agency	We do however have one potential issue at the present time concerning the increase in employment over the plan period, in particular further development outlined in Section 9.1 of the consultation relating to the Cray Commercial Corridor. Given the increase in employment in the Borough and the required expansion of employment in this general location we feel that there is a potential for employment expansion to have an impact upon the SRN which is easily accessible from this location	Concerns over the expansion of employment and the impact of the Strategic Road Networks have been noted. All development of significance will be expected to be accompanied by transport impact assessments which would detail and quantify the impact on the network, as part of planning process.
Policy 9.1 – Strategic Economic Growth	Montagu Evans for London Square	We support the three strategic priority areas for economic growth outlined in 9.1: Strategic Growth. Although given these three areas are identified to accommodate the development capacity for the anticipated growth in business and employment it is unclear as to why focus is being applied to existing sites outside of these locations.	Support welcomed. The draft Working in Bromley policies identify strategic growth for the three key areas of Bromley Town Centre, Cray Business Corridor and Biggin Hill SOLDC, but also acknowledge sites outside of these areas contribute to the Borough’s employment projections for the Local Plan period. Draft policies are tailored to account for existing employment functions outside the three key areas but allow a degree of flexibility to consider potential future uses of those sites for other employment generating purposes.
Policy 9.2 – Strategic Industrial Locations	London Borough of Bexley	Bexley supports Policy 9.2, which includes Ruxley Corner at Footh Cray and would welcome any discussion regarding development within this area that may affect Bexley including sites within the Footh Cray Sustainable Growth Area. It is also noted that the policy states that to ensure a balance of employment uses the Council will not permit any further expansion of retail floor space uses in SIL areas	Support welcomed.
Policy 9.2 – Strategic Industrial Locations	NLP for Nugent Shopping Park Ltd	The area between the northern boundary of the Nugent shopping park and the railway line is designated as part of the SIL. Given the constrained nature of this site we assume that this is a cartographic error. As such we request that the boundary is amended to exclude this area of land to the south of the railway line	Amendment to remove railway line from SIL designation has been made.
Policy 9.2 – Strategic Industrial Locations	1 individual; Bromley Biodiversity Partnership	Allow a buffer zone around the Ruxley Gravel Pits SSSI in NE (near Edginton Way/A20) and in southern section of the SSSI. Along the River Cray, take account of its value for wildlife, buffer against chemical pollution, and avoid light pollution that would have an adverse effect on bats using the river corridor for foraging and commuting	There is not considered to be sufficient need to allow for a buffer around the SSSI. In regards to a submitted planning application, impact on the SSSI will be considered on the basis of the nature of the development proposal.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Policy 9.2 – Strategic Industrial Locations	Orpington Field Club, Dr Judith John	The boundary needs to take account of the proximity of Ruxley Gravel Pits SSSI and allow for a buffer zone around it. It appears too close to the SSSI boundary in the north-eastern section (between Edgington Way and A20). It also appears to be too close at the southern boundary of the SSSI. The boundary also needs to take account of the River Cray so that this does not become subject to pollution. This includes light pollution from approximately mid-April until the end of October when bats may be foraging along the watercourse.	There is not considered to be sufficient need to allow for a buffer around the SSSI. In regards to a submitted planning application, impact on the SSSI will be considered on the basis of the nature of the development proposal.
Policy 9.2 – Strategic Industrial Locations	Tesco Stores Ltd	The land shown be within the SIL to the south and west of the Tesco store on Edgington Way, but north of the A20 should be omitted from the SIL. Instead, this land should be shown as land with no notation, or a flexible commercial land use. This land unlike much of the SIL has never been used for industrial purposes. Its use for a wider variety of commercial uses will encourage a wider form of economic development uses to come forward on the site including business, public, community, retail and other main town centres uses. This could include wider economic development uses that serve to service the employment needs of the SIL by providing complementary services and land use such as hotels, gyms, crèches and retailing. It could also include uses that complement the neighbouring site, such as a car workshop or car sales or dealership, retailing or similar commercial uses unsuited to town centres. These are in themselves a good source of employment and are recognised within the NPPF as "economic development" which should be encouraged. The long term zoning of the site for employment use fails to acknowledge the site circumstances in relation to this part of the proposed SIL. The site is accessed through a retail store, petrol filling station and car dealership, passing through a bus facility. It has very limited road frontage and no presence from Edgington Way, from where access will be obtained. It is an unusual shape and modest sized site, which does not lend itself easily to an efficient layout for an industrial use, especially when access has to come into the site via the Tesco store to the north. It does not readily link with adjoining sites in the SIL. It immediately adjoins a SSSI with implications for any development proposals. The site's topography and in particular where the site will be accessed from Tesco further limits development potential. It is a constrained site and allocating it for an inflexible tightly defined "employment use" where there is no reasonable prospect of any such use coming forward renders it to a continued future that contributes nothing of economic value to the SIL as it remains undeveloped. Hence, the designation of the site within the SIL fails to achieve SIL policy objectives and hence why the site should fall outside the SIL.	The Foots Cray Business Area is identified as a SIL in the London Plan. The site adjoins an existing industrial estate as well as Tescos and a vacant industrial site. There is a requirement to ensure that the Borough has sufficient industrial and business floorspace to meet future needs. It is considered that this part of the SIL places an important role in the overall contribution to employment floorspace and the objectives for economic growth in the Cray Business Corridor.
Policy 9.2 – Strategic Industrial Locations	Blue Sky Planning for Travis Perkins	Klingers Site: Given the requirement to encourage economic growth, and the strategic evidence of a diminishing need for industrial and warehousing uses, policy 9.2 should be amended so that it more effectively takes into account local circumstances: "Proposals for non-B uses must provide employment generating uses complementary to the role of the SIL. For non-B uses to be acceptable, they must	The draft Working in Bromley policies present a hierarchy of acceptable uses across the different industrial / employment areas of the Borough. In line with current evidence and London Plan policies, the draft Local Plan identifies sites for designation as SIL which can reasonably support the Borough's industrial needs and are

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>replace existing non-B use on the site or address existing constraints which limit the ability to bring forward the site for B-uses:</p> <ul style="list-style-type: none"> • Ground conditions (e.g. contamination, geo-technical, drainage etc) • The need to address local issues arising from the built or natural environment (e.g. listed building, archaeology, SINCs etc) • Amenity issues; or • The need to provide infrastructure requirements such as new roads or accesses” 	<p>free of insurmountable barriers to investment for Class B uses across the Local Plan period Draft policies. The draft Working in Bromley can operate in tandem with other draft Local Plan policies to address specific environmental, heritage and amenity matters.</p>
<p>Policy 9.2 – Strategic Industrial Locations</p>	<p>Quod Planning for Scotia Gas Networks</p>	<p>Sevenoaks Way, Leeson's Hill Gas Holder Site – Objection to the SIL designation and policy 9.2. It is a restrictive and prohibitive policy. Its blanket allocation across the Leeson's Hill/Sevenoaks Way Gasholder site fails the tests set out in adopted London Plan Policy 5.22 and Paragraphs 22 and 173 of the adopted NPPF.</p> <p>We propose that the Leeson's Hill/Sevenoaks Way Gasholder site in Orpington is de-allocated from this designation boundary on the following grounds:-</p> <ul style="list-style-type: none"> • The continued allocation of the site for Class B uses does not consider the implications for this form of development in this location. • The proposed land use allocation does not take account of the need to incentivise and fund decommissioning. The allocation fails to give regard to the costs associated with remediation alongside dismantling of associated infrastructure and the need to bring forward future land uses to fund this process. • The proposed land use allocation fails to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. • As there is no reasonable prospect of this site being used for B class uses post the cessation of operations by SGN, alternative uses of the land should be considered and treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Policy 9.2 fails to achieve this. • Redevelopment of the site for alternative uses will support wider regeneration benefits in this central and accessible location within the Borough as it will remove the limitations introduced by the HSE PADHI land use zoning. <p>On this basis, we consider that the site should be de-allocated and identified as “white land”.</p>	<p>The subject land is located in St Mary Cray SIL (category: Industrial Business Park) under the London Plan. The format and location of the site are consistent with the London Plan's description of Industrial Business Park land and the draft Local Plan's intent for the Cray Business Corridor. It is considered that the site can reasonably contribute to the Borough's confirmed industrial needs over the Local Plan period, while there is insufficient evidence suggest there are insurmountable barriers to the continued use of the site for uses consistent with the SIL designation. Therefore, the site should be retained under its present allocation to enable future Industrial Business Park related development.</p>
<p>Policy 9.2 – Strategic Industrial Locations</p>	<p>Jones Lang Lasalle for Legal and General Assurance Society Ltd</p>	<p>Suggest removal of pub and Mill House from the Business Park as the area is better suited to residential uses as it lies within the St Paul's Cray Conservation Area and the buildings</p> <p>The reason why this flexibility should be applied the land owned by Legal and</p>	<p>Further work has been carried out and this has been reflected in proposals brought forward in the DAFPD document and retained in the latest draft Local Plan.</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
	(Crayfields Business Park)	<p>General Assurance Society Limited at Crayfields, is that it already supports a large amount of office floorspace. Indeed, outside L&G's ownership but within the designation of the Business Area is also a public house. Therefore in our opinion the area cannot be considered as a SIL or LSIS and flexibility in relation to the type of uses accommodated on the site, will allow a variety of uses to continue to be provided for employment generating floorspace, as well as other service functions such as crèche's or health facilities.</p> <p>In terms of Area 1 it should be noted that only the smallest unit is in industrial use with all of the remaining units in predominately office use. In Area 2b all of the units are in office use. It should also be noted that one of the buildings in which office provision is provided in Mill House. The building is residential in nature and as such it would be unable to support any change of use to industrial use. Furthermore, part of the employment area (outside L&G's ownership but within the SIL designation) also supports a Public House.</p> <p>Only in Area 2a are most of the buildings in industrial or warehousing use.</p> <p>Therefore, as the Employment Area supports a range of other uses (such as, offices and a public house) it should not be designated as a SIL or as a LSIS under policy 9.3. This will allow the business areas to continue to promote employment uses across the 'B' classes (not just Classes B1(c) and B2 for industrial use).</p> <p>As well as complementing the existing uses on the site this approach will ensure that a wide range of employment uses can also be considered on their own merits and allowed when in appropriate locations to compliment or support existing employment sites at Crayfields Business Park. Flexibility and/or criteria should be incorporated into the wording of the policy to allow other employment development to come forward.</p> <p>In conclusion, Crayfields Business Park should be considered under emerging policy 9.4, which reflects the current missed use of the sites and provides the correct policy framework to assess development in the business parks.</p> <p>JLL (Crayfields) – The area between the Industrial Park and the Business Park, whilst currently designated as being within the Green Belt, is surrounded by developed land. In order to support the function of the existing business area and indeed help to provide a greater amount of employment/quasi employment floorspace in the Borough, this area of land should be removed from the Green Belt and incorporated within the existing business areas.</p> <p>Area 3, whilst currently designated as being within the Green Belt, is surrounded by developed land. Its inclusion within the business area would meet with the thrust of the policy framework within the NPPF, which seeks to build a strong, responsive</p>	

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. This point has particular relevance to Area 3 as it is odd finger of land sandwiched between the two designated Business Areas at St Paul's Cray. If it was removed from the Green Belt it would allow the Business Areas to be linked together, which would increase the amount of land available for employment development, and help to support the existing business and industrial areas.</p> <p>In terms of its designation as Green Belt, the site does not benefit from any strong defensible boundaries between it and the developed land surrounding it. However, the River Cray naturally provides a strong defensible boundary between the site and the countryside/designated Green Belt land beyond its eastern boundary (if this site was to be removed from the Green Belt with Areas 4 and 5 remaining within it).</p> <p>On this basis, it can be seen that it does not check the unrestricted sprawl of large built-up areas (as it sits within a built up area), nor will its development prevent neighbouring towns merging into one another, as it is simply a finger of land within an existing business park. Lastly, the land does not preserve the setting and special character of an historic town and if it was allowed to come forward for redevelopment it would assist in urban regeneration (it is previously developed land which sits within a business park, which could come forward for development for new employment floorspace. The land does not, therefore, perform any of the functions that by definition, Green Belt land should provide set out in the NPPF.</p> <p>Areas 4 & 5 (see JLL map) total approximately 3 hectares in size and benefit from being, located adjacent to previously developed land to the south (the existing business park) the Bowling Green to the west and from previously developed land and buildings to the east. A mixed use development of the site could help to finance the renewal / provision of new employment or quasi employment uses whilst providing valuable new homes. As such, it is respectfully requested that Area 4 is considered for removal from the Green Belt and redevelopment mixed use and/or residential redevelopment.</p> <p>In relation to Area 5 this has been identified as being a suitable location for Photovoltaic Panels (PVs). The provision of PV's in this location will enable the businesses located on Crayfields Business Park to obtain their energy from a renewable source as well as the possibility that any additional energy generated can be sold back to the national grid.</p> <p>Clearly, this type of development will not only allow the Business Park to be powered by Renewable energy but it also should allow a cost-effective contribution to the UK carbon emission objectives for carbon reduction set by the Government of 15% renewable energy from final consumption by 2020.</p>	

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>Areas 4 and 5 fall outside the defined business area and is again surrounding by previously developed land (albeit less intensively than Area 3). The site benefits from a clear defensible boundary to the west (Sandy Lane) as well as previously developed land to the north-west; this will assist in safeguarding the countryside beyond from encroachment. Furthermore, if the proposed development of the Cray Wanderers Football Stadium does come forward, this again will increase the defensible boundary to the north east of the site. Lastly, the land does not preserve the setting and special character of an historic town.</p> <p>The value to the Borough of removing these areas from the Green Belt has been identified within the Council's own Studies. The most recent of these studies, Stimulating the Economy Study January dated 2013 was commissioned by the Council to understand how the economy in Bromley could be stimulated, particularly in these difficult economic times.</p> <p>In terms of Crayfields Business Park, the 2013 Report states at Paragraph 1.11 that there are opportunities for upgrading and intensification of use of the land and for the extension of the designated business areas onto adjoining land. The report acknowledges that Green Belt is afforded protection through national policies but that given the identified demand and limited potential within existing employment areas, that the Council could make a case for the selective review of Green Belt boundaries in this area to meet identified local development need for employment floorspace.</p> <p>The report highlights the there is an identified need in the Borough for additional employment floorspace, namely: 120,500 sqm until 2031. However, that in terms of meeting this need in a suitable locations such as Crayfields Business Park that the Green Belt allocation in this area is an identified barrier, and as such, presents a clear risk to the deliverability of additional employment development (Paragraphs 5.29 and 5.30).</p>	
Policy 9.3 – Locally Significant Industrial Sites (LSIS)	The Beckenham Society	Lower Sydenham - Proposed LSIS Lower Sydenham map: this does not show the full extent of the proposed development along Worsley Bridge Road, which is actually in Lewisham Borough.	It would be inappropriate to show designations that have been proposed by other Local Authorities.
Policy 9.3 – Locally Significant Industrial Sites (LSIS)	Robinson Escott	Lower Sydenham - Dylon site has permission for residential led mixed use scheme, therefore it should be removed from the LSIS, and also the adjacent site.	Following further research, the former Dylon site has been removed from the proposed Lower Sydenham LSIS in the latest draft Local Plan.
Policy 9.3 – Locally	West & Partners for Relta Ltd	Lower Sydenham – the sites to the east of the railway line are qualitatively the least desirable given that they are relatively isolated from the rest of the Estate (by the	Following further research, Dylon has been removed from the proposed LSIS.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Significant Industrial Sites (LSIS)	(former Dylon Site)	<p>railway line) and occupation type is constrained by a very restricted bridge height on the main access.</p> <p>The Dylon site has an implemented permission for a residential led mixed use scheme. To retain this LSIS designation would be contrary to the NPPF</p>	Lower Sydenham is a key established industrial area with low vacancy. The proposed designation is important in enabling pursuing a range of floorspace for industrial and business.
Policy 9.3 – Locally Significant Industrial Sites (LSIS)	BPTW partnerships	<p>Lower Sydenham - object to the proposed Maybrey Works site allocation as part of a Local Significant Industrial Site (LSIS) in Lower Sydenham. The site, located to the south of Worsley Bridge Road, is an isolated existing industrial site that is physically separated from the rest of the proposed LSIS. Moreover, the site, as existing, does not relate to the surrounding context which is characterised by residential uses and open space.</p> <p>The proposed LSIS designation is physically separated into two sections which are delineated east and west of the railway line which runs north to south through the proposed LSIS designation. The majority of the proposed LSIS is located to the west of the railway, this area is characterised by large warehouses which are used for heavy industrial uses. To the east of the railway, Maybrey, along with the adjoining former Dylon factory site, form only a small part of the LSIS designation. The Dylon site which adjoins the Maybrey site to the north, was, in 2010 granted planning permission for a residential led mixed use scheme. The Maybrey site remains the only existing industrial land to the east of the railway line within the proposed LSIS designation.</p> <p>Retaining the Maybrey site within an area designated within the proposed LSIS is not justified in planning policy terms. Given the isolated relationship of the Maybrey site from the rest of the proposed LSIS designation the removal of this allocation would not prejudice wider planning policy in terms of the employment designation</p>	Lower Sydenham is a key established industrial area with low vacancy. The proposed designation is important in enabling pursuing a range of floorspace for industrial and business.
Policy 9.3 – Locally Significant Industrial Sites (LSIS)	1 individual	Lower Sydenham – revise red-line boundary for the industrial site (South-Eastern part) to exclude the River Pool.	Land along Pool River is identified as a Site of Importance for Nature Conservation (SINC) in the draft Local Plan. The draft policy for SINC is intended to operate alongside the draft policy for LSIS for any relevant planning applications on this site. It is not considered necessary to amend the LSIS boundary to exclude this land.
Policy 9.3 – Locally Significant Industrial Sites (LSIS)	Robinson Escott	Homesdale Road – a sizeable part of this site is used for A1 retail so should be removed	The DAFPD and supporting Industrial Land and Premises Update of 2015 concluded that the Homesdale Road site no longer matched the description of an LSIS. The site is no longer proposed as an LSIS in the latest draft Local Plan.
Policy 9.3 – Locally	Quod Planning for Scotia Gas	The existing Scotia Gas Networks site at Homesdale Road/Liddon Road, Bromley falls within the designation boundary of draft Policy 9.3 (LSIS). We recognise that	As above.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Significant Industrial Sites (LSIS)	Networks	<p>the Council have tried to take into account paragraph 22 of the NPPF in respect to viability and the costs of development albeit we are of the opinion that any redevelopment proposal which had to “provide a significant element of business/ industrial uses or other employment generating uses” would immediately be rendered unviable and unsuitable for this location.</p> <p>There is no point, in our view, allocating a site solely for Class B1, B2 and B8 uses when it is very clear that these uses (in isolation) would not be developed at this site in the future once the gas holder use ceases. Indeed it would be perverse to do so. The site is located in a primarily residential area adjoining a retail site. It would seem reasonable to assume the subject site should be allocated for mixed use development with residential and retail to generate the land values necessary (in accordance with the London Plan) to decontaminate the site.</p> <p>In light of the above, we consider that draft policy 9.3 does not provide enough consideration of the key aspects considered pertinent to the redevelopment of a hazardous installation.</p>	
Policy 9.5 – Business Improvement Areas (BIAs)	Montagu Evans for Taylor Wimpey East London	<p>Conquest House – support directing the Borough’s office-based businesses within Bromley Town Centre as the main location to accommodate such development. Support the three strategic growth areas. Encouraging additional office space in the Borough without considering population growth is not sustainable. Proposals for mixed use developments which retain office space within the strategic economic growth areas whilst providing housing address numerous Council objectives over the Local Plan period.</p> <p>Agree with the need to manage and improve the supply of high quality office floorspace as per Policy 9.5. Concerned by the term ‘or which compromise the primary function of the BIA’ as this is ambiguous. The correct test should be that in addition to their being not net loss of floorspace, schemes will only be supported where they demonstrate improvements to the quality of the business environment. This could be through a combination of various means including enhancement of the quality of floorspace, public realm improvements and introduction of complimentary uses through a mix of uses.</p>	<p>Support for strategic growth areas is welcomed.</p> <p>The economic and population projections published by the GLA which are used as a basis for the London Plan (2015) have outlined that Bromley has a projected employment growth of 16,000 jobs (13.6%) over the plan period. Infrastructure needs to be in place to support this level of growth and the encouragement and retention of office space in the borough is necessary to address the Council’s objectives. This has been reflected in the draft policy for Office Clusters.</p> <p>Concern has been noted. The draft Local Plan is updated to include clearer and more consistent wording between Working in Bromley policies, including the draft policy for BIAs.</p>
Policy 9.8 - Office Change of Use/Redevelopment Outside Business Improvement Areas (BIA)	Mr Dunn	<p>There are already too many empty office blocks and business premises in Bromley. If they have remained empty for any length of time they are obviously not attracting business to the area. Instead of remaining empty and contributing nothing to the Town they should be encouraged to be converted into homes to meet the Housing targets. There have already been successful conversions in the past, and these should be allowed to continue, as they then bring life to the Town 'after hours' and bring much needed accommodation. Any applications for new office blocks should be resisted. This should also apply to other redundant commercial premises i.e.</p>	<p>Comments have been noted.</p> <p>A significant amount of office space in Bromley has been lost to change of use from office (Class B1(a)) to residential (Class C3) permitted development since 2013. This has greatly reduced office stock and has contributed to housing need.</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		factories and warehouses. If they are on existing industrial sites they should be encouraged to be put to other community use.	Given the loss of office, areas of good quality stock in accessible locations should be retained to help support economic growth and this has been reflected in the draft policy for Office Clusters.
Policy 9.8 - Office Change of Use/Redevelopment Outside Business Improvement Areas (BIA)	Copers Cope Residents' Area Association	A stronger policy is required on converting offices to flats to ensure Beckenham retains office workers which boost the High Street economy.	<p>A cluster of employment space on Beckenham High Street had been proposed as an Office Cluster (formerly Key Office Cluster) designation in the DAFPD document 2015 to help prevent its loss.</p> <p>However, evidence has shown that the number of properties in this cluster has changed since the background paper was drafted. Further work on the draft policy for Office Clusters confirmed that the Beckenham High Street land no longer matched the description of an Office Cluster. Therefore, the land is no longer identified as an Office Cluster in the latest draft Local Plan.</p>
Policy 9.8 - Office Change of Use/Redevelopment Outside Business Improvement Areas (BIA)	GLA	Notes that the London Office Policy Review (2012) suggests that prospects for office development in Bromley were not as strong as anticipated in previous reviews. The GLA would be interested in Bromley's evidence on commercial requirements and also discuss results of the study with the Borough.	Noted. The LBB will continue to consult closely with the GLA as the draft Local Plan progresses.
Policy 9.8 - Office Change of Use/Redevelopment Outside Business Improvement Areas (BIA)	Montagu Evans for London Square	We note the provisions of 9.8, which relates to Office Change of Use/Redevelopment outside Business Improvement Areas (BIA) and specifically refers to purpose-built large offices. As such, we would not consider the criteria set out in this policy to apply to Hayes Court, which was originally a residential building that has been extended incrementally and occupied by a variety of different uses over the years.	Comment has been noted. The site in question has planning permission for change of use to residential and is no longer applicable to the criteria set out in proposed policy 9.8.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Working in Bromley –Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)

Site: Bromley Business Centre, 27 Hastings Road, Bromley

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Designate land as LSIS

2 responses were received – 1 letter, 1 response online.

Respondents	Summary of issues	Officer comment
DHA Planning on behalf of Bromley Business Centre Holdings Ltd and Taylor Wimpey	<p>The site should be promoted as a future residential led mixed use site for allocation as part of the London Borough of Bromley’s emerging Local Plan for the reasons below:</p> <ul style="list-style-type: none"> • Unprotected employment facility • Established areas of housing • In respect of a location for growth, Table A2.1 of the London Plan identifies the City’s Town Centre Classifications and broad future directions. It identifies Bromley as a Metropolitan centre of regional importance and predicts high levels of growth. The site is located on the outskirts of a Metropolitan centre and benefits from excellent retail, employment and leisure opportunities and direct mainline rail links to central London • The site is well situated for access to the wider strategic road network • The site benefits from excellent bus links • The site could deliver 45 one and two bed apartments with approximately 600sqm of replacement commercial floorspace • The site presents an excellent opportunity to make more efficient use of brownfield land by providing a number of new homes and upgrading the existing employment provision • No known technical constraints <p>It is suitable for development, deliverable within single ownership and achievable because of its accessibility and infrastructure already in place.</p>	<p>Whilst the site could be considered for housing in the future, given the site currently forms an important industrial site which is currently occupied for employment uses, it is not considered appropriate to allocate for housing. Any planning application submitted in the future will need to comply with the relevant planning policies in place at that time.</p>
1 individual	<p>The site is in the middle of a residential area. At the Blue Circle Inquiry the Inspector decided that the pressure on housing was that it constituted the very special circumstances required for building on the Green Belt in Bromley Common.</p>	<p>The site has been assessed for housing and its location within the residential area is noted. However as stated above, it is not considered appropriate to allocation for housing at this stage.</p>

Site: Maybrey Works, Worsley Bridge Road, Lower Sydenham

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Designate land as LSIS

1 email response was received

Respondent	Summary of issues	Officer comment
<p>GVA Planning on behalf of Purelake New Homes Ltd</p>	<p><u>Requested change</u></p> <ul style="list-style-type: none"> As the planning history of the adjacent former Dylon site has proven office space to be unviable, residential only scheme would be most suitable redevelopment solution Local character is 'urban', suggests 75-280 dwellings could be achieved (equating to 45-170 units per ha) Note that former Dylon site achieved density of approx. 135 units per ha, which could also be achieved on the Maybrey Works site <p><i>Requests reallocation of site for residential use</i></p> <p><u>Planning History</u></p> <ul style="list-style-type: none"> In May 2013, site owners lodged a planning application for mixed use redevelopment, for 147 residential units, ground floor business uses and 183 parking spaces. Application was later withdrawn but owners intend to pursue a revised scheme. Adjacent former Dylon site was subject of planning approval by appeal in 2010 for mixed use redevelopment for 223 residential units, plus ground floor B1, retail and other commercial uses. Subsequent appeal for a revised scheme replacing the B1 component with 74 additional residential units received approval in February 2015. Inspector agreed that marketing had adequately demonstrated no reasonable prospect of site ever being occupied for office <p><u>Discussion</u></p> <ul style="list-style-type: none"> Parcels to the east of Lower Sydenham train station are physically segregated from remainder of LSIS by railway cutting, with no direct vehicular access to this section of LSIS. Granting of permission for housing on adjacent former Dylon site resulted in draft removal of that site from LSIS in DAFPD, further segregating the Maybrey Works site from the remainder of the area's industrial function. Within Flood Zones 2 and 3 and subject to groundwater/surface water flood risk. Does not preclude redevelopment potential Not within or adjacent to Conservation Area, no listed buildings on or near site (adjacent redevelopment of Dylon International Works site would result in loss of locally listed building) Site of Importance for Nature Conservation (SINC) could be sensitively incorporated into any redevelopment proposal Air Quality Management Area designation on site, as well as potential contamination associated with industrial uses would not restrict residential use. 	<p>The landowners assert that the current development is in a poor state and presents significant hurdle to long term tenancies. Evidence provided in 2013 at the time of the previous planning application, by Grant Mills Wood on behalf of the applicant, suggests the cost of refurbishment outweighs potential revenue from tenancies in refurbished industrial units for the foreseeable future. It is asserted that a significant turnaround in demand for general industrial stock is necessary to improve viability of a "like for like" refurbishment or redevelopment of the site.</p> <p>Recent evidence provided for the Emerging Local Plan preparation points to an oversupply of large format industrial sites across the London Borough of Bromley's (LBB) employment areas, compiled with a reduced overall demand for traditionally large format type uses such as warehousing and manufacturing. However, the GVA Grimley Employment Land Study, produced for the LBB in 2010, noted a critical deficiency in supply of small and medium sized premises at the time of publication.</p> <p>Later studies produced for the LBB, including the DTZ Retail, Office, Industry and Leisure Study (2012) and GL Hearn Stimulating the Economy Report (2013), identify a growing requirement for office uses across the Borough, but recommend concentration of these uses in existing town centres.</p> <p>The owners of the Maybrey Works site now request reallocation of the land for residential uses only. The landowners allege the latest permission by appeal for the adjacent Dylon site (to replace the previously approved office space in the mixed use scheme with further residential space) provides a precedent for the requested allocation for land within the Lower Sydenham LSIS to the east of Lower Sydenham train station. However, whilst the Dylon site has lay vacant since 2006, the majority of the Maybrey Works site, which is now in an internally subdivided format of nine predominantly small to medium format units (with an average unit size of less than 500 m²), continues to be occupied. As of last year, the site was predominantly used for light industrial or employment-generating sui generis land uses. This suggests an ongoing demand exists for these categories of employment use in this</p>

Respondent	Summary of issues	Officer comment
	<ul style="list-style-type: none"> • Any redevelopment would be accompanied by townscape analysis to ensure no harm to local character or openness of MOL • PTAL Level 2, approx. 150m from Lower Sydenham Train Station, within walking distance of numerous bus stops to Lewisham, Bromley, Grove Park, Bell Green. 1.4km from Sydenham District Centre, 800m from Sainsburys • Surrounding area predominantly residential, sites on street parking is limited. Local characteristics therefore inhibitive to good access, parking restrictions will limit number of vehicles and operator can have on site • No loss of community facilities, close to range of community services • LBB published Industrial Land and Premises Update for consultation alongside DAFPD. Report showed Lower Sydenham LSIS had vacancy rate of 14%, highest rate across all LSIS sites in LBB. Borough-wide industrial vacancy of 5% and business vacancy of 7% at report's publication. These figures demonstrate the designation is not meeting light industrial need. • Approved residential use on adjacent former Dylon could impede continued industrial function on site. Likewise, existing hours of operation on site could harm amenity of neighbouring residential uses. • Grant Mills Woods report (March 2013) provided as part of previous planning application for site indicated all units in Maybrey Works in poor condition. Vacant units have remained vacant for several years. • Evidence suggests no need to retain outmoded B class buildings. Demand for large format manufacturing floorspace nearly non-existent. Substantial availability across all B sectors, occupiers demanding high quality for reduced rents • Demand for office floorspace should be directed towards more appropriate locations such as town centres or business parks • Moving forward, income generated from leaseholders insufficient to support necessary renovation required to bring units to appropriate standard meeting modern day light industrial needs. Unlikely any future investment will be forthcoming 	<p>section of the Lower Sydenham LSIS. The landowners have not satisfactorily demonstrated why the site cannot continue to support B Class uses into the future.</p> <p>With a site area of 16.8 ha (excluding the former Dylon site), containing 69,544 sqm of existing floorspace, the Lower Sydenham LSIS is considerably larger than any other current or proposed LSIS in the Borough. The LBB's Local Plan Background Paper: Industrial Land and Premises Update 2015 identified that the Lower Sydenham LSIS was dominated by industrial and warehousing functions (approx. 98% of floorspace), while only 1% of floorspace in the LSIS was being used for office purposes. At the time of the paper's publication, the Lower Sydenham LSIS had a vacancy rate of 14% (excluding the former Dylon site). However, the scope of this paper did not allow for a closer inspection of specific land use types in the LSIS and the unit sizes that typify these.</p> <p>The London Plan, Map 4.1 depicts Borough level groupings for transfer of industrial land to other uses. In this figure, the Borough is categorised as "restricted". Further, the Borough's overall loss of industrial land since 2010 equates to 2.5 ha, which is exceeding the Greater London Authority's (GLA) benchmark for annual loss of industrial land between 2011 and 2031. The Borough has an industrial vacancy level of 5%, which is below the GLA's benchmark vacancy rate for this same timescale (Supplementary Planning Guidance: Land for Industry and Transport 2012).</p>

Site: Various sites proposed as Locally Significant Industrial Sites (LSIS) and safeguard Strategic Industrial Locations (SIL)

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Designate land as LSIS or SIL

16 responses were received – 5 emails and 11 responses online.

Respondent	Summary of issues	Officer comment
DHA Planning on behalf of Taylor Wimpey (UK)	Bromley Business Centre, Hastings Road LSIS Disagree with Bromley Business Centre being highlighted as a site of ‘significance’ in relation to industrial and office and would like to see it continue as an unprotected industrial/office designated site;	The LBB considers Bromley Business Centre to be a cluster of industrial/employment functions that continue to service the local catchment and therefore suitable for designation as LSIS.
DHA Planning on behalf of Bromley Business Centre, Holdings Ltd	The Beechwood Centre, Bromley Common LSIS Additional layers of unfair restrictions by changing the site to “protected” office designation. The imposition of “protected designated” would weaken any consequent planning applications.	The LBB considers the Beechwood Centre to be a cluster of industrial/employment functions that service the local catchment and therefore suitable for designation as LSIS. Further, this site provides modern facilities which enhance its contribution to the Borough’s industrial/employment stock.
Deloitte on behalf of Aberdeen Assets Management	Croydon Road Industrial Park, Elmers End LSIS: <ul style="list-style-type: none"> • Site incorporates other uses in addition to industrial need and owner wishes to ensure that these wider uses are supported in future Local Plan policies; • The draft policy wording, combined with proposed site allocation would be too restrictive and would not acknowledge the current position across the Elmers End site; • Greater flexibility should be introduced in the policy and LSIS in general, to acknowledge existing mix of industrial and non-industrial uses. 	The draft policy allows a degree of flexibility for certain uses within an LSIS, provided that the intent of the LSIS is maintained and where a loss of industrial uses is proposed, it is thoroughly demonstrated that the site is no longer required for industrial purposes in the long term. It is considered that the proposed wording provides a suitable balance between promoting positive economic outcomes and protecting land for the Borough’s industrial needs.
Nathaniel Lichfield and Partners on behalf of Tesco Ltd	Foots Cray, Ruxley Corner SIL: <ul style="list-style-type: none"> • Should be excluded from SIL allocation as it has been employment use for a number of years and has failed to attract B class development over this period and never been used for “employment” purposes; • It is not an attractive site for business use; • It has no frontage to a main road and is not physically linked to the rest of the Business Area/SIL; • It is constrained by access, topography, size, and proximity to a nature reserve; • It might be better suited to accommodate other employment needs such as office use; • Site was previously marketed and failed to generate sufficient business; • The area already supports a high concentration of Non-B class uses; this undermines the sites SIL status; • The poor SIL site cannot be justified. 	The Land to the rear of Tescos is identified as a SIL in the London Plan. The site adjoins an existing industrial estate as well as Tescos and a vacant industrial site. There is a requirement to ensure that the Borough has sufficient industrial and business floorspace to meet future needs. It is considered that this part of the SIL places an important role in the overall contribution to employment floorspace and the objectives for economic growth in the Cray Corridor.
London Borough of Bexley	Crayfields Business Park: <ul style="list-style-type: none"> • Unclear whether Crayfields will be re-designated as London Plan SIL and replaced with Key Office Cluster designation or dual; 	Crayfields Business Park contains a dual designation of Office Cluster and SIL. The proposed Working in Bromley policies acknowledge and respond to this dual designation.
Nathaniel Lichfield and Partners on	SIL boundary: <ul style="list-style-type: none"> • SIL boundaries in Bromley should be reviewed so that suitability of sites and Business Areas for employment can be assessed. 	The boundaries of existing UDP Business Areas and other clusters of industrial/employment uses were reviewed in 2014 to identify the proposed SIL and LSISs. Following the 2015 DAFPD consultation,

behalf of Tesco Ltd		these boundaries have undergone further review and it is considered that the proposed boundaries adequately provide for the Borough's industrial/employment need for the Local Plan period.
1 individual; London Borough of Bexley	<p>Cray Business Corridor:</p> <ul style="list-style-type: none"> • Strong support of approach to ensure balance of employment uses in the Cray Corridor without planning for additional retail use; • Development and protection of Cray Business Corridor is welcomed, but should be for office and light industrial. 	Support for SIL approach is welcomed.
2 individuals	<p>Summary of General LSIS Issues:</p> <ul style="list-style-type: none"> • Broad support of LSIS concept, although unsure how it would work with sites located in Green Belt; • See previously submitted comments in respect of the need to review the Lower Sydenham LSIS to exclude sites on Worsley Bridge Road to the east of the Hayes/London railway line: <i>Lower Sydenham – the sites to the east of the railway line are qualitatively the least desirable given that they are relatively isolated from the rest of the Estate (by the railway line) and occupation type is constrained by a very restricted bridge height on the main access.</i> • Some sites are in residential areas. The pressure on housing constituted the “very special circumstances” required for building on the Green Belt; • Higham Hill is located in the Countryside, making it a worse location for an LSIS than residential; • The sites should be near built-up areas, due to transport considerations. However, with housing being priority now is not the time for industrial sites. 	<p>Lower Sydenham is a key established industrial area with low vacancy. The proposed designation is important in enabling pursuing a range of floorspace for industrial and business. Please refer to comments above on the Maybrey Works site.</p> <p>Noted Higham Hill is in the Green Belt, but the site matched methodology criteria to warrant its inclusion in allocation.</p>
Mr David Scott, Highways England	<p>Summary of General Industrial Issues:</p> <ul style="list-style-type: none"> • The need to retain industrial land is accepted, although it is having a notable impact on housing; • “Pen-pushing” establishments should be discouraged; • Concern over employment increase particularly in Cray Valley Corridor; • Employment expansion can have an impact on the Strategic Road Networks; • Large scale development should not go ahead without proper and proportionate consideration for the Strategic Road Networks. 	<p>General concerns have been noted. The draft Local Plan identifies land that can reasonably provide capacity to service the Borough's industrial needs over the Local Plan period. The LBB is satisfied that it can achieve its housing target without releasing further industrial/employment land.</p> <p>Concerns over the expansion of employment and the impact of the Strategic Road Networks have been noted. All development of significance will be expected to be accompanied by transport impact assessments which would detail and quantify the impact on the network, as part of planning process.</p>

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Working in Bromley – Office Clusters

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: To safeguard designated Office Clusters (previously referred to as Key Office Clusters) for office uses.

16 responses were received – 5 emails and 11 responses online.

Respondent	Summary of issues	Officer comment
1 individual; London Borough of Bexley	<p>Summary of General issues:</p> <ul style="list-style-type: none"> • Bexley welcomes the approach to planning for office floorspace and broadly supports the concept of Office Clusters. However, mindful of current Government's approach to Permitted Development and presumption of planning for the long term – considered appropriate measures; • Disagreement over the growth of employment coming from sectors occupying office floorspace due to the increase of home working. 	<p>Comments noted. Recent changes to Permitted Development (PD) affecting office supply will need to be taken into account in finalising these designations. Three key office supply areas have already been protected from conversion under PD and further protections may be considered. Further work on demand for offices is being undertaken in order to ensure a robust policy position.</p>
1 individual; Bromley Friends of the Earth	<p>Summary of issues:</p> <ul style="list-style-type: none"> • Office Clusters are located near residential areas; • There is demand for housing, as proven by PD; • Housing will be forced into Green Belt if safeguarding of office is approved. • Careful consideration should be given to allocating office space to land which could be re-designated for housing. 	<p>The Borough's Five Year Housing Land Supply and Local Plan trajectory already includes a small contribution from office to residential conversions, but strategically it is considered important to protect good quality office stock around the borough. Further work on demand for offices is being undertaken in order to ensure a robust policy position. The Council is confident that it can meet the London Plan target for housing without using Green Belt land.</p>
2 individuals; Robinson Escott Planning on behalf of South East Living Group	<p>Summary of Issues (proposed Office Cluster at Masons Hill):</p> <ul style="list-style-type: none"> • The methodology is flawed; • Demand for office floorspace does not accurately forecast economic conditions; • Lack of clarification over percentage of available office; • Masons Hill cluster can still be deemed acceptable without Cobden Court included in boundary; • Cobden Court does not meet minimum threshold as stated in the methodology; • Cobden Court has only been allocated because of its proximity to the rest of the draft office cluster; • The formation of an Office Cluster would restrict the building from being converted to other commercial or residential uses; • If Cobden Court were to become vacant, it would likely be a long term vacancy that would require a period of marketing; • The Government's view on change of use from office to residential is an important material consideration; • PD from office to residential is intended to be made permanent in line with greater flexibility; • Cobden Court does not fall within an Article 4 Direction; • Cobden Court should be removed because of its location in respect to neighbouring residential 	<p>Not a feasible option to remove Cobden Court. The minimum threshold applies to the cluster as a whole, not individual sites.</p>

	properties.	
1 individual; Highways England	<p>Summary of issues (proposed Officer Cluster at Crayfields Business Park):</p> <ul style="list-style-type: none"> • Supports the removal of Crayfields Business Park from the Strategic Industrial Location and Locally Significant Industrial Site designations; • The Office Cluster policy should ensure that other employment and complimentary uses can be accommodated; • The office floorspace does not include D1 floorspace; • One building on the site is not made reference to; • The policy will restrict the expansion of local businesses and is likely to prevent vacant units for being reused for employment; • To support this designation the land south of Crayfields should be removed from green belt and included for employment use; • Concern over the increase of employment particularly within Cray Valley Corridor; • Employment expansion can have an impact on the Strategic Road Networks; • Large scale development should not go ahead without proper and proportionate consideration for the Strategic Road Networks. 	<p>The Crayfields Business Park is not intended to be removed from the Cray Business Corridor SIL. Rather it will carry a dual designation by also being identified as an Office Cluster. The draft policy for SIL is updated to acknowledge this dual designation.</p> <p>Class D1 floorspace does not form part of the methodology.</p> <p>Concerns over the expansion of employment and the impact of the Strategic Road Networks have been noted. The policy is designed to safeguard existing employment land within the designation, and any planning applications on the site will be determined by highways on a case by case basis.</p> <p>The LBB does not consider exceptional circumstances exist to amend the Green Belt boundary for employment purposes.</p>
Copers Cope Area Residents' Association and West Beckenham Residents' Association	<p>Summary of Issues (proposed Officer Cluster in Beckenham High Street):</p> <ul style="list-style-type: none"> • An Article 4 on Beckenham High Street is desperately needed; • Concern of local businesses over loss of large amounts of office floorspace to PD; • Most office space in High Street has been subject to PD applications; • Loss of office space could consequently cause a loss of daytime High Street activity; • The rush to change office to residential is allowing the wrong premises to be changed; • Pressing MPs to oppose making PD rights permanent; • Office Cluster in Beckenham should be expanded to include Burnhill Road and Kelsey House. <p>CCARA supports the Beckenham High Street designation, although Marqueen House is not included in the boundary line on the plan.</p>	<p>Comments are noted.</p> <p>Evidence has shown that the number of properties in this cluster has changed since the background paper was drafted. Further work on the draft policy for Office Clusters confirmed that the Beckenham High Street land no longer matched the description of an Office Cluster. Therefore, the land is no longer identified as an Office Cluster in the latest draft Local Plan.</p>

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Working in Bromley – Town Centres Policies

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Objective 5 (Town Centres)	Beckenham Society	Suggest a third new bullet: “Ensure reasonable and sustainable parking charges as well as good access by alternative modes of transport”.	No amendment recommended. Parking charges cannot be set or controlled by Local Plan policies.
Objective 5 (Town Centres)	1 individual	Support the continued improvement of Orpington ADD ‘and Beckenham’	Orpington is a Major Town Centre, as opposed to Beckenham which is one of five District centres. For clarity, the wording will be amended
Objective 5 (Town Centres)	Simply Planning on behalf of KICC	Support the second objective of the Local Plan in relation to town centres which remarks:- <ul style="list-style-type: none"> Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes 	Support welcomed.
Bromley Town Centre designation	GL Hearn	Q22 – Bromley Town Centre Designations We consider that the emerging document should acknowledge the proposed retail floorspace that will come forward as part of ‘Site G’, as detailed within the Bromley Town Centre Area Action Plan (AAP), with new retail frontages being formed onto both Ethelbert Square (anchor store element) and Churchill Street. It is therefore requested that these two frontages are illustrated as future retail frontage designations.	The AAP will be reviewed following the adoption of the Local Plan. The map can be updated following the AAP review to have regard to developments and proposal sites within the AAP
Bromley Town Centre designation	NLP on behalf of Intu Properties	Intu support the designations of the primary and secondary frontages as shown on the Bromley Metropolitan Centre Map (page 167).	Support noted
Draft Policy: Renewal Areas	London Borough of Croydon	We welcome the draft Policy 5.13 (vi) the statement that you “acknowledge relevant initiatives and plans in adjacent boroughs and cooperate with them to plan strategically across administrative boundaries and to maximise the benefits of proposals with cross boroughs impacts”. The draft Local Plan states that Supplementary Planning Guidance can be developed to expand on the range of issues, challenges, key sites and opportunities within the various Renewal Areas. We have a clear joint ambition for Crystal Palace and would like to be engaged at the draft stage in any collaboration or proposals for Crystal Palace, on any SPG or Development Briefs where they lie close to our borough’s boundaries or have implications for the District Centre.	Comments noted. Welcome support from London Borough of Croydon. Continue to work cross borough with Croydon, other neighbouring boroughs and the GLA to ensure co-operation and, where appropriate, consistency.
Draft Policy: Renewal Areas	Southwark Council	We recognise that Crystal Palace is proposed as an “Area of renewal” in draft policy 5.13 and 5.15 of the draft Local Plan and also that Policy 2.16 and table 2.1 of the draft Further Alterations to the London Plan (FALP) identifies Crystal Palace as potential strategic outer London development centre for leisure, tourism, arts, culture and sports. Whilst Crystal Palace is outside Southwark it borders the southern parts of our borough. We support the promotion of Crystal Palace but emphasise the need for the five boroughs that will be directly affected by any future development at Crystal Palace Park to work together and in conjunction with the Mayor and explore the potential for a	Welcome support from Southwark. Discussions will continue with other neighbouring Boroughs in relation to proposals for Crystal Palace.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		planning framework to ensure appropriate development, in accordance with the London Plan policy 2.16.	
Draft Policy: Crystal Palace Penge & Anerley Renewal Area	London Borough of Croydon	With regards the draft Policy 5.15 Crystal Palace & Anerley Renewal Area, we welcome the protection of the commercial properties along Church Road, this accords with Croydon's wish to see a Crystal Palace Triangle with three active sides.	Support welcomed.
Draft Policy: Crystal Palace Penge & Anerley Renewal Area	Southwark Council	Due to the prospect of a major leisure/commercial development at Crystal Palace Park, it is our opinion that this matter should be specifically addressed through Bromley's new Local Plan, as noted in the supporting text for draft policy 5.15. This would ensure that the appropriateness of development	Comments noted. The major leisure/commercial development previously referred to is no longer being pursued. Cross-borough work is ongoing in relation to the SOLDC designation and in the event of cross borough Neighbourhood Plan proposals.
Chapter 9 Working in Bromley	NLP on behalf of Marks & Spencer	To ensure consistency with the NPPF we recommend that a definition of town centre (to include local centres) is added either in the introduction of the Town Centres section of Chapter 9 or in the glossary of the document. This is to ensure that the retail policies are interpreted correctly and it is clear what sites are in the centre and which sites are "edge of centre" for planning policy purposes. The NPPF glossary definition of local centres includes "city centres, town centres, district centres and local centres".	Glossary to include definition of a town centre and key shopping areas
Chapter 9 Working in Bromley	NLP on behalf of Intu Properties	NLP on behalf of Intu Properties Intu suggest that a new paragraph titled 'shopping trends' is inserted to provide an update on recent shopping trends since the previous Local Plan was published in 2006. This paragraph should reference: the past and projected growth of multi-channel shopping (Beyond Retail, 2013); the changing space requirements of both convenience and comparison retailers (Javelin Group White Paper 2011); the growth of the leisure sector including both food and drink uses (A3-A5) and commercial entertainment facilities (D2); and, the divergence in types of town centres/high streets emerging since the recession (Beyond Retail, 2013).	Noted. It is considered that the supporting paragraphs to the shopping policies address the current situation relating to shopping areas sufficiently for the purposes of the Local Plan Policies. Further information relating to the shopping areas and trends is contained in the Council's Retail, Office, Industry and Leisure Study carried out by DTZ 2012.
Chapter 9 Working in Bromley	Quod on behalf of Croydon Ltd Partnership	Section 9 of the draft Plan outlines the proposed retail policies for town centres (with Bromley town centre identified as the main retail centre for the Borough). A Retail Capacity Study conducted in 2012 concluded that Bromley could accommodate capacity for a further 10,700sqm net of comparison floorspace at 2016; rising to 23,100sqm by 2021 and 37,700sqm by 2026 if forecast trends occur. In this context we would like to draw the Council's attention to the draft FALP (2014). We would request that the Council considers any proposed retail policy in light of the form that this emerging policy takes once adopted.	Noted. The retail capacity for Bromley will be reviewed when the AAP is reviewed following the adoption of the London Plan. The Local Plan policies have regard to the now adopted London Plan.
Draft Policy: Location of New Development	London Borough of Bexley	Bexley generally supports and agrees with Policy 9.16 regarding town centre development, including around focussing development within town centres and only allowing out of centre development where it meets the criteria set out in the NPPF and London Plan. We would wish to be kept up-to-date on any future retail proposals close to the borough boundary, particularly in and around the Sevenoaks Way retail parks. Bexley agree with the statement under policy 9.2 that to ensure a balance of employment uses the Council will not permit any further expansion of retail floorspace	Noted

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		uses in SIL areas, which include in large parts of the Sevenoaks way area.	
Draft Policy: Location of New Development	nlp on behalf of Nugent Shopping Park	Part i. of this Policy is not consistent with the NPPF. Paragraph 24 of the NPPF states “They [Local Planning Authorities] should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre.” The Policy should be reworded to ensure it complies with the NPPF in terms of edge of centre and out of centre sites. Furthermore, the Policy wording (as drafted) at line 3 is unclear.	Policy reworded to comply with the NPPF
Draft Policy: Metropolitan & Major Town Centres	Mr Tony Allen on behalf of The Chislehurst Society	We note that the Nugent Centre is not referred to here. Its impact on local centres and the advantages it has for shoppers, particularly free parking, is significant. What is the policy regarding new developments such as this within the Borough?	The town centre policies seek a town centre first approach to new retail development in accordance with the NPPF and the sequential approach.
Draft Policy: Metropolitan & Major Town Centres	English Heritage	<p>It is unclear whether the present draft Local Plan invites comments on the proposals contained within the adopted Bromley Area Action Plan, or whether the AAP will be subsumed within the Local Plan. We note that this policy continues to refer to the AAP as a separate local plan document, while Policy 9.18 suggests that they will be combined.</p> <p>When drawing all the Town Centre boundaries careful consideration should be given to the purpose for which these are being defined. Is it to ensure the appropriate location of retail? Is it an appropriate boundary when considered against potential densification policies within the London Plan (and proposed alterations)? Conflict between conservation area objectives and densification proposals requiring demolition should be avoided.</p>	<p>The AAP will continue to be a separate document with a review planned shortly after the adoption of the Local Plan. The Local Plan Site Allocations document contains some sites which were previously in the AAP e.g. Former Site A, and the Civic Centre Site.</p> <p>Town Centre Boundaries have been consulted on and new wording has been added to the policy text to refer to developments within town centre boundaries.</p>
Draft Policy: Metropolitan & Major Town Centres	Montagu Evans	<p>We support in principle Policy 9.17 and its requirement that development within Bromley Town Centre must adhere to policies contained within the AAP 2010 in 9.17 Metropolitan & Major Town Centres. However, it is also essential that the AAP objectives are also updated to be consistent with emerging town centre objectives proposed by the FALP.</p> <p>There could be greater coherence between the sections working in Bromley and living in Bromley. The aims of policy within these sections overlap to achieve the overarching vision of the draft Local Plan. There is scope to link policies to ensue sustainable growth through mixed use developments. For example a sustainable site could deliver both housing units and additional office accommodation.</p>	<p>The Local Plan Policies have had regard to the AAP. The AAP will be reviewed following the adoption of the Local Plan.</p> <p>Cross references added to ensure the policies relating to growth are linked.</p>
Draft Policy: Metropolitan & Major Town Centres	1 individual	I support Orpington town centre being included in the Cray Valley Renewal Area as it is a Major Town Centre, as designated in this emerging plan, and yet, as acknowledged above, it is coming under pressure from neighbouring retail centres as well as pressure from on line retailing. To help to counter these pressures it is essential in my view that existing sites within the town centre should be optimised in order to create a more vibrant town centre. In particular I consider that the former police station site should be	Comments noted. The cinema development is now complete and the development of the police station site is underway.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>designated as a proposal site as having potential for a range of uses, but particularly for high density residential. Currently the site is under used and is presumably on the Met Police disposal list following the construction of the large borough police station at Bromley South. Designation of the site as a proposal site should be followed by a development brief scoping the nature and extent of development that the site could accommodate to give more certainty to potential developers. Creating high density housing at the site, with potentially retail, restaurant or community uses at ground floor, would help to bring people back into the heart of the town centre creating more custom for struggling retailers and creating more vibrancy in the evenings when the market square is quiet and rather forbidding. Such proposals would also contribute much needed new housing to contribute towards the borough's housing targets. With the exception of the southern end of the site, where development would need to be lower to take account of the houses opposite, the site can otherwise accommodate development of several storeys without causing harm to neighbouring amenity. Whilst a planning permission exists for the cinema and retail complex, which I very much hope proceeds, I consider this site should be designated as a proposal site for retail, restaurant, leisure and potentially also residential uses, in the event that the current proposals cannot attract sufficient pre-lets to proceed. This at least would signal a continued commitment on behalf of the Council to see this important site come forward for development. I would also recommend that a review of vehicle usage of the two multi-storey car parks in the town centre (above the Walnuts and above Sainsbury's) is undertaken. If these are under used then they should also be designated as proposal sites and mixed use redevelopment encouraged, re-providing some car parking but also providing new residential above, as has been successfully undertaken at the Tesco site. I trust that you will take my comments into account in your considerations and I would be grateful if you would keep me updated with the development of the Local Plan and future consultations.</p>	
<p>Draft Policy: Bromley North Station Site (former site in Bromley Town Centre AAP)</p>	<p>TfL</p>	<p>Former Opportunity Site A in the Bromley Town Centre AAP. This will form a Site Allocation in the Draft Local plan for comprehensive development for a mix of uses reflecting the site's location as a major transport interchange, a bus stand, an important gateway to the Town Centre and within a proposed Business Improvement Area. Support the following text addition:</p> <p>Part of the site is a regionally important stand owned and operated by TfL. Any development proposal will have to, at the very least, maintain the current function of the bus stand and, if possible, improve it.</p>	<p>Noted.</p>
<p>Draft Policy: Bromley Civic Centre (Site F in Bromley Town Centre AAP)</p>	<p>Quod on behalf of the Croydon Ltd Partnership</p>	<p>Policy 9.19 of the draft Local Plan draws upon the adopted Bromley Town Centre Area Action Plan and proposes that "retail uses" are added to the list of acceptable uses to be included in any mixed-use development which comes forward on the Bromley Civic Centre site. The civic centre site is not within the adopted Primary Shopping Area and instead occupies an edge of centre location. To ensure the civic centre does not adversely compete with the primary shopping centre, we suggest that draft policy 9.19 is revised to clarify that it is "ancillary retail uses" which will come forward on the Civic</p>	<p>Reference to retail has been removed from the wording of the Civic Centre Site allocation.</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Draft Policy: District Centres	1 individual	<p>Centre Site.</p> <p>1) Local_Plan_Draft_Policies_and_Designations_Consultation</p> <p>1.1) I disagree with the designation map on Pg27 that indicates the area of Crystal Palace Town is represented as a “Neighbourhood Centres And Parade”. I consider the District Centre of Crystal Palace has the catchment area that covers the “dot” shown on this map at Crystal Palace. Please see (1.3) for further details.</p> <p>1,2) I disagree with the Boundary shown for “Crystal Palace Town Centre Boundary” on Page 179. Please see (1.3) for details.</p> <p>1.3) In response to the “Question 29” (Do you agree with this designation boundary”), I do not. I consider that Crystal Palace Town Centre boundary encompasses its major transport node that adjoins the Crystal Palace Triangle shopping areas (on the Bromley side), and the row of cafes, restaurants and other shops opposite side (on the Lambeth side) for the following reasons:</p> <p>a) The Crystal Palace District Town centre “catchment area” needs to take into account its joint inner/outer London district centre nature, serving a wide community covering 4 immediate Boroughs of Lambeth, Bromley, Croydon and Southwark residents (again over outer and inner London).</p> <p>b) Crystal Palace Town is served by one major bus transport node, with its major bus routes, that is part of the District location’s high Public Transport Accessibility Level. This transport node is literally “across the road” and adorning from the Crystal Palace Triangle.</p> <p>c) The bus interchange and shops on Crystal Palace Parade together with Crystal Palace Town Centre have a combined role and accessibility, serving the same community. The shops on the Crystal Palace Parade and its bus interchange do not serve another and “very local area” and community separate from the Crystal Palace District Centre.</p> <p>d) The Crystal Palace District Town centre has a vibrant day-time and night-time economy, noting the many overnight bus routes. The shops opposite the bus interchange, and bus interchange are an integral part of Crystal Palace District Town. The taxi and cafes and restaurants on the Crystal Palace Parade equally serve this area and Crystal Palace District Town area in the Triangle and vice versa.</p> <p>e) This “whole” area needs to be considered as one “district” to ensure appropriate planning considerations are made to serve the one area and community around the district centre appropriately.</p> <p>f) District Town centres are given this designation because they are centres that serve local communities and they are accessible for pedestrians and are within walking distance to a transport node and major bus routes. I see no further reason why these shops and the bus station are excluded from Crystal Palace district boundary, that is presently “just across the road” from the current Town Centre boundary line.</p>	<p>Map has been amended to show Crystal Palace as a District Centre.</p> <p>The transport interchange is included within the SOLDC for the Crystal Palace area and therefore not considered appropriate to include within the town centre boundary.</p> <p>Discussions regarding Crystal Palace will take place with neighbouring Boroughs and GLA</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Draft Policy: District Centres	1 individual	<p>Crystal Palace Triangle Group. Note item 5 in relation to Crystal Palace District Centre to “encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes. The part of Crystal Palace triangle that belongs to Bromley (Church Road) should also be designated as a Major Centre. To not have it marked as a centre at all ignores the reality that it is. Merely because Croydon/Lambeth/Bromley each have a part of what makes the triangle does not mean that Bromley's contribution and recognition of Church Road it as a Commercial centre is not needed. Much more co-ordination between the three Boroughs in this area is needed. The renewal area of Crystal Palace and Hayes are incorrectly numbered on the above map as 11 instead of 1, and vice versa.</p> <p>Crystal Palace is also a of strategic economic growth. Bromley repeatedly fails to give enough attention to this extremity of it's boundary, and the lack of co-ordination with the three/four adjoining Boroughs is a hinderance to the economic development that is occurring INSPITE of the lack of support and coordinated planning from Bromley.</p>	The map has been amended to show Crystal Palace as a District Centre
Draft Policy: District Centres	Simply Planning on behalf of KICC	<p>Our client objects to the new secondary retail frontage proposed for Crystal Palace District Centre (Page 179). The proposed secondary frontage extends from 2a Anerley Hill to 31 to 41 Church Road and includes our client's property (No. 25 Church Rd).</p> <p>The extent of the defined secondary frontage is, in our opinion, excessive and includes a significant proportion of non-retail uses including our client's property and its neighbours to the south west) which present a 'dead frontage' to Church Road. They are inappropriate for inclusion in a defined secondary frontage. The extent of the secondary frontage should be limited to between 2a Anerley Hill to 23 Church Road.</p>	Frontages have been re looked at and it is considered that the boundary should extend along Church Road to include the residential section in the middle of Church Road so that it is not fragmented and is consistent with the boundary that Croydon have on the opposite side of the road.
Draft Policy: Neighbourhood Local Centres, Local Parades and Individual Shops	Beckenham Society	Add a 3 rd tenet to the Policy: “(iii) the Council will seek to use saturation policies for the creation of a moratorium of any particular class of use where this would be beneficial to maintain a balance of classes of use.” This reflects a need from time to time to create a moratorium on certain classes of use eg A3 where the retail offer in high streets etc has become dominated by a single class of use which threatens to discourage the retention or opening of niche retailers.	Comments noted. The policy wording as amended is considered to be satisfactory to encourage a vibrant town centre to not allow an inappropriate overconcentration of uses. It is important to note that the functions of the town centres differ and therefore each case will need to be looked at on an individual basis having regard to the centre within which it is located.
Draft Policy: Neighbourhood Local Centres, Local Parades and Individual Shops	1 individual	<p>We agree to the policies but consider that the shopping policy area in the Chislehurst local centre should include 115-117 High Street as it abuts onto the adjoining retail parade at 89-113 High Street. Whilst 115-117 has existing residential use any potential redevelopment should also consider retail use in order to enhance the retail offer to this part of the High Street. 13.3 Appendix 3 - Local Centres - Chislehurst - To be amended to include 89-117 High Street and in accordance with the previous Proposals Map which included this within the shopping frontage policy area</p> <p>We agree to the objective of Policy 9.21 to support the provision of essential goods and services within the designated local centres and to contribute to its vitality and viability</p>	The terrace of shops finishes at 113 high street Chislehurst. The two residential units at 115-117 are not part of the parade and currently residential in use, it therefore does not seem appropriate to designate them as a retail frontage. The Council will resist the loss of housing except where the accommodation is unsuitable or incapable of being adapted for continued residential use or where the proposal meets an identified need for

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		for shoppers. However in the context of the Chislehurst Local Centre we consider that the designated local centre area should include 115-117 High Street. This property should continue to have the benefit of existing residential use but also should be considered for retail use as it abuts onto the adjoining retail parade. In fact the subject site was designated as being located within the shopping frontage policy area in the previous Local Plan Proposals Map. We therefore propose the alteration of 13.3 Appendix 3 - Shopping Frontage - Local Centres - Chislehurst instead of 89-113(o) we propose 89-117.	community facilities.
Draft Policy: Neighbourhood Local Centres, Local Parades and Individual Shops	Mr Tony Allen on behalf of The Chislehurst Society	<p>While we support the broad approach, it may be that that more flexibility is required as shopping habits change and use of local centres changes. In particular we support the proposal in ii below, but on the basis that a and b are alternatives; in other words, either a or b, and not both a and b. We would welcome a statement that the Council will seek and respect the views of local groups as to whether change of use is appropriate. This is particularly relevant in Chislehurst, where we have a very active Town Team. I note that Appendix 13 (shop frontages) omits no 3 High Street Chislehurst for no apparent reason.</p> <p>We are surprised that Chislehurst Town Centre is not recognised here as an important local centre. Given the efforts of the local Town Team to maintain and improve the Chislehurst Town Centre, we would welcome its explicit mention, and a designation map indicating LBB's understanding of the extent of the centre.</p>	Noted. Criterion (b) has been removed. However, this policy does not relate to Chislehurst. A additional policy for Local Centres such as Chislehurst has been inserted as this was previously omitted in error.
Draft Policy: Neighbourhood Local Centres, Local Parades and Individual Shops	Mr Peter Cahill on behalf of Hayes Village Association	A point that is not made, is that small local centres, Hayes being one. are an essential part of the neighbourhood. They are part of the glue that help to bind community together in a way that larger centres cannot. They help to create a sense of community which is important element in a healthy and low crime residential area..	Noted. Policy for local centres added. Map has been inserted at the beginning of town centres section to show the shopping areas
Draft Policy: Change in Use of Upper Floors	English Heritage	We welcome the recognition in paragraph 3 of the supporting text that occupation of upper floors in commercial areas can promote vitality (and surveillance) in historic areas. In view of extreme pressure for housing in the capital, it would be helpful to make stronger, more proactive statement regarding the full use of existing under-used buildings and particularly upper floors for residential use.	Support noted
Draft Policy: Change in Use of Upper Floors	Crest Nicholson	The Council recognises the many benefits associated with encouraging residential uses at upper floor levels within the town centre.	Support noted
Draft Policy: Change in Use of Upper Floors	1 individual	Agree with Policy	Support noted
Draft Policy: Development outside of Defined Town Centres	Grey Gray Associates	Para 9.25 - Development outside of Defined Town Centres indicates that proposals for new retail development outside of existing centres will be expected to demonstrate a need for the proposal. There is no justification as to the inclusion of this criteria in any accompanying text and our client considers that such a requirement is contrary to national policy.	Amendment made. Reference to needs test has been removed and Policy 9.25 has been deleted.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>Keston Garden Centre, typical of many garden centres, is located in an out of centre location due to the space requirements associated with such a use which, in addition to the low value to size ratio of the goods sold, render a town centre location impractical and unviable. By requiring a demonstration of need for <u>any</u> new retail development outside existing centres, the Local Plan will be failing to provide support for existing retail businesses located within the rural area or to address the needs of such a specialist retailer.</p> <p>Whilst national policy guidance does indeed adopt a 'town centre first' approach to retail development, para. 28 of the NPPF also requires local plans to support '<i>the sustainable growth and expansion of <u>all types</u> of business and enterprise in rural areas</i>'.</p> <p>Furthermore, para 23 of the NPPF requires local planning authorities to "<i>set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres</i>". As stated, garden centres comprise one such 'specialist' use and it is not appropriate to introduce unwarranted restrictions, such as the demonstration of need, in respect of such uses.</p>	
Draft Policy: Development outside of Defined Town Centres	NLP on behalf of Nugent Shopping Centre Park Ltd	<p>Criterion i. of this Policy is not consistent with the NPPF and should be removed. The 'needs test' is not required by the NPPF (for planning applications), nor is it referred to in the recently published National Planning Practice Guidance. It is therefore does not form part of national planning policy and no justification has been provided for this departure. For consistency, and for the Local Plan to be considered 'sound', criterion i. should be deleted.</p> <p>Furthermore, criterion ii. Of this Policy states that a sequential test for development outside town centres should be met. In essence, this requirement replicates the provisions of Policy 9.16 (discussed above) and is considered repetitive and unnecessary. Given our comments on criterion i. (above), we request that Policy 9.25 is deleted and the requirement for a sequential test id covered by Policy 9.16 (worded suitably to ensure consistency with national policy).</p>	Amendment made. Reference to needs test has been removed and Draft Policy: Development outside of Defined Town Centres has been deleted.
Draft Policy: Development outside of Defined Town Centres	NLP on behalf of Marks & Spencer	<p>As currently worded our clients objects to Policy 9.25 'Development outside Defined Town Centres'. The particular part of the policy which our client has concerns about is sub paragraph (i). This element of the policy requires the applicant to demonstrate there is 'need' for new retail development outside town centres.</p> <p>The 'needs test' is not part of national planning policy and therefore this draft policy both goes beyond the requirements of the NPPF and is inconsistent with national policy. No local justification has been provided for such a major departure from national policy. At a time when national policy is seeking to encourage and not act as an impediment to economic growth (see e.g NPPF paras 18 & 19), creating an additional hurdle to development inconsistent with national policy is not justified. In accordance</p>	Amendment made. Reference to needs test has been removed and Draft Policy: Development outside of Defined Town Centres has been deleted.

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>with para. 182 of the NPPF it is considered that the policy is not sound.</p> <p>To make Policy 9.25 consistent with the NPPF, and therefore sound, we recommend sub para (i) is removed from the policy.</p> <p>With the needs test removed from Policy 9.25 the only element of this policy which remains is the sequential test, which is covered in Policy 9.16, part i. Therefore, we recommend that Policy 9.25 is deleted in its entirety so that the policies in Plan are not repetitive.</p> <p>If the Council is not minded to delete Policy 9.25 we recommend that it is reworded as follows: "Proposals for new Retail & Leisure Development outside of existing centres will be expected to meet the following criteria:</p> <p>i. there is a demonstrated/evidenced need for the proposal and ii. demonstrate the sequential test has been met as set out in the NPPF".</p> <p>Sub Para (i) of 9.16 also does not accurately reflect the sequential approach in the NPPF. Given that the wording is already contained in the NPPF we suggest that the sub para is reworded to require "compliance with the sequential approach as set out in the NPPF". This will also ensure consistency with Policy 9.25 if this is retained.</p>	
Draft Policy: Residential Accommodation	1 individual	I think ground floors should be allowed to be converted where the premises are on the very end of a parade of shops or in a location that is on the corner of residential rows of houses or on the fringes where residential meets shop premises. In most cases these were probably houses in the first place and rather than remain boarded up and empty could be put into residential use.	Noted – permitted development rights allow for conversions of A1 to C3 subject to prior approval. If the premises is located within a Key shopping area, the Council will take into consideration the impact on the sustainability of the shopping area
Draft Policy: Shopfronts and Security Shutters	1 individual	Commercial premises should be made to use open shutters. This gives a better impression when they are closed at night. There is nothing more unappealing than a row of local shops closed at night with solid shutters. It gives the impression of the shops being empty and closed and the area in decline.	Noted – the policy states that the Council will resist solid shutters
Draft Policy: Shopfronts and Security Shutters	English Heritage	We welcome the reference in this policy to the retention of shop fronts of architectural or historic merit.	Support noted
Draft Policy: Advertisements	English Heritage	We recommend that part iv) should include a reference to avoiding harm to the significance of listed buildings.	Text added
Draft Policy: Advertisements	1 individual	Agree with Policy	Support noted

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Working in Bromley – Biggin Hill Strategic Outer London Development Centre

Proposal at time of 2014 Draft Policies and Designations: Establish SOLDC boundary and remove defined areas of the airport from the Green Belt to facilitate specified development

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
Policy 9.1 – Strategic Economic Growth	NLP for Biggin Hill Airport	BHA – fully supportive of this policy where the Biggin Hill SOLDC is identified as one of three strategic priority areas for economic growth.	Policy unchanged since 2015 Draft Allocations, Further Policies and Designations (DAFPD) consultation
Policy 9.9 - Biggin Hill SOLDC	JETS & Biggin Hill Business Association	<p>Imperative that businesses are able to expand and/or regenerate their premises in response to market demand, in a timely manner. Our industry is dynamic and our customers have options to develop at other places in the UK, or abroad. Speed and flexibility to build new premises at the airport is vital to achieving the LOCATE initiative to deliver 2,300 additional jobs by 2031.</p> <p>Planning policy for the airport must be clear and strong so that there is no ambiguity for business investors. Investor confidence is vital to attract companies from around the world and to create the platform for growth and employment envisaged for Biggin Hill in its role as a SOLDC in the London Plan.</p> <p>The Local Plan references for the SOLDC refer to it as “an important sub regional hub for aviation and related high tech industry achieving sustainable growth whilst protecting the environment”. There is ambiguity and doubt for investors in this statement. Biggin Hill is a London SOLDC and has the unique opportunity identified in the Airports Commission Interim report of playing a significant role for the Capital as a Business and General Aviation Reliever Airport. If the economic potential and 2,300 jobs are to be realised, the policies for the LOCATE@BigginHill initiative must follow the aspirations and objectives of both the London Plan and the national aviation policies including national environmental policies.</p>	<p>Minor changes made to policy since 2015 DAFPDP consultation but intent retained.</p> <p>Sustainability will be critical consideration in determining proposals in SOLDC. Considered that strong economic outcomes can be achieved in SOLDC whilst taking into account acceptable impacts on surrounding environment, landscapes and communities.</p>
Policy 9.9 - Biggin Hill SOLDC	NLP for Biggin Hill Airport	<p>The Local Plan must meet all the statutory tests of ‘soundness’ – that is that the Plan is positively prepared, justified, effective and consistent with national policy. There are sections within the chapter which are not fully consistent with these tests. Page 131, 5th paragraph should read:</p> <p>“The Business Area at Biggin Hill is identified as a SOLDC in the adopted London Plan, which is a centre with an economic function of greater than sub-regional importance. It currently provides areas of employment land and 1,000 jobs, mostly in businesses associated with the aviation industry and air transports facilities.”</p> <p>Page 132 fails to include aviation associated businesses within the SOLDC which have the potential to create 2,300 jobs and make a significant contribution towards the Borough’s employment targets.</p>	<p>As above.</p> <p>Council is satisfied that proposed wording achieves intent of promoting sustainable development with strong economic outcomes consistent with national policy, London Plan and Local Plan vision and objectives.</p> <p>Council considers current definition of SOLDC boundary defensible and consistent with intent of SOLDC as described in London Plan and Mayor’s Town Centres SPG. Land along</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>Page 132 – replace the paragraph on Biggin Hill SOLDC with:</p> <p>“The SOLDC designation at Biggin Hill promotes economic growth at Biggin Hill Airport and the adjoining industrial areas, with the potential to create 2,300 jobs and other economic benefits to the Borough, as well as wider benefits to London as a World City. Development would focus on aviation-associated development and high tech related industries, with associated business infrastructure and amenities seek to enhance timely access to the Airport and would have regard to measures set out within an Environmental Management Plan.”</p> <p>The London Plan SOLDC designation and the growth prospects of the SOLDC area provide the basis for an exceptional circumstances case to remove certain sections of land from the Green Belt through a selective/partial review focused solely on the SOLDC boundary. Without removing land from the Green Belt, the SOLDC cannot be developed and promoted as intended by its policy designation. These unique circumstances are specific to Biggin Hill and would not be applicable to any other sites within the Borough; hence a full Borough-wide Green Belt review is not necessary nor required by the NPPF. This has been the case at other UK airports, where parcels of land have been removed from the Green Belt without a full Borough-wide Green Belt review.</p> <p>BHA – welcomes the overarching policy, however the policy must be consistent with the SOLDC policy in the London Plan. The policy must be positively prepared and reflect the LoCATE strategy. The Airport has serious reservations regarding any requirement to prepare a detailed Masterplan in that this process will further delay the Airports ability to attract new businesses/expansion of existing businesses and offer sites to potential investors, continuing to hold up inward investment. The Airport is also concerned that preparation of a Masterplan would be too prescriptive and limit the flexibility for future development. With the right policies in place in the Local Plan, a Masterplan would not be required. The Airport, as part of its on-going work, is currently refining an earlier version of an illustrative spatial plan for phased future development at the Airport. This spatial plan will indicate those areas where future development is anticipated to be brought forward and inform the specific boundaries of land that should be released from the Green Belt. Reference to a Masterplan in Policy 9.9 should be omitted and amended as follows:</p> <p>“The Council in partnership with LoCATE@Biggin Hill will develop and promote the Biggin Hill SOLDC as an important strategic economic location of greater London-wide importance for aviation associated development, by ensuring that there is an appropriate and ready to occupy supply of employment land, enhanced timely access to the airport, with the creation of 2,300 jobs and other economic benefits, contributing to London’s World City status.”</p> <p>BHA – there is no policy proposed for land surrounding the main airport terminal. This land is currently occupied by the main airport terminal building and one hanger. This land is also within the Green Belt. The Airport requests that proposed policy for this area allows for the</p>	<p>eastern side of Airport considered to have greater exposure to surrounding sensitive environments and intensification in certain areas could have an unacceptable adverse impact on these environments.</p> <p>Option of preparing masterplan for SOLDC as a whole or for specific land parcels in SOLDC not expressly identified in proposed policy.</p> <p>Parcels proposed for Green Belt release, including Terminal Area, West Camp and Land East of South Camp provide positive platform for investment, development consistent with intent of SOLDC, for Local Plan period and beyond. Proposed amendments are based on strong evidence, accord with criteria outlined in NPPF and provide balance between promoting economic growth and minimising adverse impacts on environment and communities.</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>redevelopment of the terminal building and aviation development to the north of the terminal building and that this land is also removed from the Green Belt.</p> <p>the proposed boundary does not precisely follow the Airports operational boundary and the SOLDC boundary should be amended accordingly.</p> <p>Map also shows boundaries for West Camp, South Camp and East Camp. Airport requests boundaries are amended following completion of on-going work between Airport and Council.</p>	
Policy 9.9 - Biggin Hill SOLDC	London Borough of Croydon	Welcome Bromley's support of the SOLDC with increased support of economic growth activities at the Airport. Look forward to working with the Council on proposals to improve the road links between New Addington and Biggin Hill and the subsequent Masterplan for the SOLDC	Supported welcomed. Council will continue to work closely with statutory consultees, incl adjacent Boroughs.
Policy 9.9 - Biggin Hill SOLDC	English Heritage	<p>The preparation of a Conservation Area Management Plan is welcome and we understand this is progressing. This will be a fundamental building block for determining how the heritage assets may be conserved and enhanced while providing for beneficial economic re-use. We note, and welcome, the sensitive approach to ensuring that the Management Plan is in place prior to consideration of any removal of land from the Green Belt. Any such removal would need to be clearly justified in terms of the conservation objectives for the site.</p> <p>English Heritage - Policy 9.9 Biggin Hill SOLDC, p158 - We recommend that the policy is amended at the end of the first para to read: '...whilst protecting the environment, including the historic significance'.</p>	<p>Council is conducting more detailed design studies for land in West Camp in a separate exercise to the draft Local Plan and has been involved in ongoing dialogue with Historic England and a number of key stakeholders.</p> <p>Option of preparing Conservation Area Management Plan for land in West Camp not expressly identified in proposed policies. However it is envisaged that outcomes of these studies will be directly informed by input from Historic England.</p> <p>Intent of suggested wording captured in proposed West Camp policy</p>
Policy 9.9 - Biggin Hill SOLDC	Bromley Biodiversity Partnership, Ishpi Blatchley	The northern boundary of the SOLDC seems to include 2 areas designated as SINCS. The boundary should be moved south to avoid this.	Instances where SOLDC boundary overlaps with SINC identified parcels. These parcels are omitted from proposed Green Belt amendments and proposed policies clarify that Council will not support development that results in unacceptable adverse impact on these parcels.
Policy 9.9 - Biggin Hill SOLDC	Orpington Field Club, Dr Judith John	Northern boundary includes SINC areas within it, adjacent to Public Right of Way. Should therefore be moved slightly further south	As above.
Policy 9.9 - Biggin Hill SOLDC	Mr Clapham	Traffic and transport implications of Biggin Hill - Strategic Outer London Development Centre (SOLDC) must consider local road infrastructure, which is inadequate to accommodate any increase in volume. Recent survey by LBB showed 4,000 vehicles per day travel North along	Proposed policies and supporting text acknowledge need for infrastructure that optimises development potential in

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
		<p>B265 and a further 4,000 per day travel South. B265 is a narrow road passing directly through Keston village. Volume of traffic already excessive in volume and speed. Traffic needs to be routed away from B265 and onto adjacent A233.</p>	<p>the SOLDC. Council is engaged in ongoing dialogue with GLA and Transport for London with regard to transport infrastructure planning for Local Plan period across the Borough, including Biggin Hill and surrounds.</p>
<p>Policy 9.10 – West Camp</p>	<p>NLP for Biggin Hill Airport</p>	<p>Generally supportive of the proposed West Camp policy. There is potential for a variety of uses on the landside part of West Camp where these will assist the regeneration of West Camp, the re-use of listed buildings and contribute to the overall objectives of the SOLDC and Local Plan. Such uses could include: Headquarter/office building where a company has a requirement to be located adjacent to an Airport, small/medium size enterprises, hotel and other associated uses such as conferencing, meeting facilities, B1 space and ancillary retail which would support the SOLDC.</p> <p>West Camp is in the Green Belt and this adds a further layer of constraint to what is already a challenging site to redevelop. Removing West Camp from the Green Belt will remove one layer of constraint and potentially make the site more attractive for inward investment. The Airport supports the policy position regarding the demolition of some buildings where their re-use is not feasible and/or redevelopment is needed to deliver a viable development solution for the site. If Council pursues a Masterplan exercise at Biggin Hill, it might be appropriate to focus this on West Camp given the need to re-plan the site and ensure the right balance of viability and heritage. Land with airside access must be retained for future aviation use.</p>	<p>Proposed policy for West Camp allows for flexibility in considering non aviation-related uses, provided that any proposed uses can demonstrated that they reinforce the intent of the SOLDC and do not impede aviation related operations or capacity in the SOLDC. Use Classes B1(a) and (b), C1 and D1 are specified in the proposed policy.</p>
<p>Policy 9.10 – West Camp</p>	<p>English Heritage</p>	<p>The West Camp at the airport contains 14 listed buildings and is a designated conservation area. All are recorded as ‘at risk’ on English Heritage’s national Heritage at Risk Register. We welcome the reference to current and continuing dialogue with English Heritage. We look forward to further discussions.</p> <p>We would like to register our concern, however, that policy 9.10 is framed in such a way as to give in principle approval for the potential demolition of some heritage assets. The NPPF requires that local plans ‘set out a positive strategy for conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats’ (para 126). When drawing up local plans and determining planning applications local authorities should take account of ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’ (paras 126 and 131). Para 137 also states that local authorities ‘should look for opportunities for new development within conservation areas....and within the setting of heritage assets to enhance or better reveal their significance.’</p> <p>Taking forward the approach from the NPPF, recommend that policy 9.10 is re-worded to read: ‘Development proposals must include the sensitive re-use and repair of the heritage assets on the site, consistent with the conservation of their significance and the character and appearance of the conservation area.’</p>	<p>Proposed policy takes into account the suggested wording provided by Historic England.</p>
<p>Policy 9.11 -</p>	<p>Orpington Field</p>	<p>Development here needs to be minimal to take account of the proximity of the proposed World</p>	<p>Proposed policies take into account</p>

Objective/ Policy/ issue	Respondent	Summary of issues	Officer Comment
East Camp	Club, Dr Judith John	Heritage Site Darwin at Downe and the SINC adjacent to the east camp	sensitivity of environments surrounding SOLDC, including land identified as SINC. Council will not support any development which would result in unacceptable adverse impact on these surrounding environments.
Policy 9.11 - East Camp	NLP for Biggin Hill Airport	<p>The Airport questions the purpose of the restricted use approach and considers that this policy is over-specific in terms of the types of uses that could be accommodated in East Camp. There may be sites in East Camp which are suitable for other supporting businesses on the Airport which do not fall into the specific categories prescribed in the policy. Indeed, if the Airport is successful in attracting new operators/manufacturers on the scale that now seems possible, it may be that land at East Camp becomes suitable for accommodating this investment. The policy as currently drafted could preclude other airport-associated uses and result in the loss of investment. In addition, East Camp's location within the Green Belt provides uncertainty for potential investors that their development can be realised and is likely to prohibit future development in East Camp.</p> <p>BHA requests that any policy for development and uses in East Camp is sufficiently flexible to allow wide range of airport-associated uses and that the area is removed from the Green Belt.</p>	Independent studies identified East Camp as having greater exposure to surrounding sensitive environments and any expansion of development in the parcel must be carefully contained. Insufficient evidence from economic development perspective to warrant release of this land parcel
Policy 9.12 – South Camp	NLP for Biggin Hill Airport	<p>Support the first part of the proposed policy which seeks to safeguard airside locations for airport/aviation-related development. However, the scope for future airside development currently within the UDP boundary for South Camp is limited due to a shortage of airside land. To enable future hanger development which has a requirement for airside access there is a necessity to extend the boundary of South Camp northwards and remove this section of land from the Green Belt.</p> <p>For non-airside parts of South Camp, the Council proposes to adopt a flexible approach that allows for non-airport/business related uses, such as general manufacturing (use class B2). Whilst BHA supports the Council adopting a flexible approach for non-airside land, it considers that the policy is not sufficiently flexible in that it does not clearly allow other uses considered to be appropriate at an Airport in this location such as a hotel, other supporting businesses, office accommodation to support businesses on the Airport and other uses as set out above.</p>	<p>Under proposed policies, Land East of South Camp is earmarked for release from Green Belt. Considered that further development of this parcel could occur in Local Plan period, whilst ensuring minimal impact on surrounding sensitive areas (incl SINC)</p> <p>Council proposes flexible approach to considering non-aviation uses, in particular certain industrial uses, where demonstrated that such uses would reinforce role of SOLDC and not impede operation of aviation-related uses or capacity in the SOLDC.</p>
Policy 9.8 - Office Change of Use/Redevelopment Outside Business Improvement Areas (BIA)	English Heritage	We would request that a careful approach is taken in terms of identifying the Biggin Hill SOLDC as potentially suitable for 'large B-use class buildings'. The plan policies should seek to optimise the potential of Biggin Hill so that the area's unique characteristics, including its heritage assets are appropriately used and enhanced. The heritage significance of the Biggin Hill site will need to be assessed to ensure that development in this area does not cause harm to its heritage values.	As above.

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Working in Bromley – Biggin Hill Strategic Outer London Development Centre

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Establish SOLDC boundary and remove defined areas of the airport from the Green Belt to facilitate specified development

50 responses were received – 12 letters, 6 emails, 31 online comments

Respondent	Summary of issues	Officer comment
Petts Wood and District Residents Association	<p>Clerical issues:</p> <ul style="list-style-type: none"> There are inaccuracies in dates in the AECOM report of October 2015 	The errors are acknowledged but it is considered that they do not affect the rationale behind the study nor the conclusions of the report.
1 individual	<p>Stakeholder consultation to date:</p> <ul style="list-style-type: none"> Consultation on SOLDC designation has been inadequate 	The London Borough of Bromley (LBB) endeavours to consult with all potentially affected community members, via a range of media and within existing budgetary constraints. Improvements will continue to be made on the variety of ways in which community members can be consulted and give feedback on planning policy matters.
1 individual; Petts Wood and District Residents Association; London Wildlife Trust	<p>Future stakeholder consultation:</p> <ul style="list-style-type: none"> Views of residents should be given significant weight Emerging Local Plan package states that a Masterplan will be prepared by LBB. Must be full opportunity for local residents to comment on Masterplan from early draft stage Views of Department for Culture, Media and Sport, International Union for Conservation and Nature, International Council on Monuments and Sites and Historic England should be sought. 	The views of local residents are important and those taking part in Local Plan consultation events should be reassured that the issues they raise are carefully considered. There will be further opportunities for community members and stakeholder groups to provide feedback as the Emerging Local Plan process continues.
Greater London Authority	<p>Views of Greater London Authority (GLA):</p> <ul style="list-style-type: none"> Support ambition for Biggin Hill London Borough of Bromley (LBB) should be satisfied release of land causes least harm to Green Belt Designation should be restricted to aviation associated industry/uses only 	<p>The views of GLA are acknowledged. In light of advice received to date, the LBB requested further review by AECOM of the evidence base and proposed policy changes under the draft Local Plan. The LBB has now considered updated advice from AECOM and the latest draft policies take this advice into account.</p> <p>No further amendments to the Green Belt are proposed following the 2015 Draft Allocations, Further Policies and Designations (DAFPD) consultation. Draft policies are proposed with minor wording changes to those included in the DAFPD consultation. A degree of flexibility is supported in land parcels such as West Camp and South Camp, where it is acknowledged certain land uses not directly aviation related already exist or have planning permission and could continue to be accommodated during the Local Plan period. The draft policies stipulate that any non-aviation related uses in these parcels must reinforce the role of the SOLDC and</p>

		<p>not impede the operation or capacity of the SOLDC's airside functions.</p> <p>The LBB will consult further with statutory authorities as required on the proposed policy changes for the Biggin Hill SOLDC and relevant environmental, heritage and infrastructure considerations.</p>
Transport for London	<p>Views of Transport for London (TfL):</p> <ul style="list-style-type: none"> • Supports expansion of Biggin Hill Airport • Expansion should as far as possible be supported with new public transport infrastructure and investment. • Expansion proposals should analyse trip generation and involve Transport for London as key consultee to ensure strategies prevent large numbers of new car trips 	<p>The views of TfL are acknowledged. The LBB has taken into account advice from URS and AECOM in 2014 and 2015 and has prepared an Infrastructure Delivery Plan to accompany the draft Local Plan, including a number of upgrades identified for the surrounding road network across the Local Plan period. The LBB will continue to work closely with TfL and other relevant statutory authorities to ensure road and public transport infrastructure upgrades are delivered concurrently with growth in the SOLDC.</p>
London Borough of Croydon	<p>Views of London Borough of Croydon:</p> <ul style="list-style-type: none"> • Supports proposed SOLDC boundary, requesting further consultation 	<p>The LBB acknowledges the London Borough of Croydon's support. The LBB will continue to consult with neighbouring Boroughs on the draft Local Plan in accordance with Duty to Cooperate policies.</p>
Historic Environment Planning	<p>Views of Historic England:</p> <ul style="list-style-type: none"> • Site designation maps do not appear to include information on any relevant policy constraints (e.g. heritage assets) • Supports LBB bringing forward a Conservation Area Management Plan to accompany any Green Belt amendments and new policies for West Camp, to help guide decision making and provide guidance to interested parties, as recommended by supporting study by AECOM (Oct 2015) 	<p>The views of Historic England are acknowledged. The accompanying maps to the draft policies are simplified to more clearly identify individual land parcels in the SOLDC.</p> <p>The LBB is carrying out focused design studies for West Camp, in collaboration with a number of key stakeholders including Historic England. The exact outputs of the process are not confirmed at this stage. Therefore, the reference to a Conservation Area Management Plan is omitted.</p>
Interflight; Shipping & Airlines Ltd; JETS (Biggin Hill) Ltd; Cirrus Aircraft, H S Walsh and Sons; London First (independent business organisation of which BHA is a member); Nathaniel Lichfield &	<p>General support for proposed policy changes but question adequacy for economic growth:</p> <ul style="list-style-type: none"> • Supports SOLDC allocation and amendments to Green Belt • Proposed policies and level of Green Belt release are insufficient to enable creation of 3,000 jobs • Other airports have been removed from Green Belt • "Airport related" employment as mentioned in policies are too restrictive. More supportive and flexible definition should be used • Cap on quantum of development within released sites unnecessary, will undermine ability of Airport to meet its growth aspirations • Unnecessary to divide Airport estate into separate areas with different policy direction for each. More strategic approach needed with more flexibility • East Camp is of limited environmental or public benefit, should be released from Green Belt to allow decanting of South Camp for regeneration • Proposed policies for West Camp lack certainty of delivery 	<p>Support is acknowledged. The strategic nature of the Airport as a business aviation centre, and its local economic benefits, are recognised in the London Plan, through the SOLDC designation and is supported by the borough. The aspirations of the airport need to be balanced carefully with environmental and social impacts to achieve the most sustainable outcome.</p> <p>Clarification on acceptable uses is necessary to support the exceptional circumstances required for Green Belt amendment and to protect existing aviation uses which can practically only be located in the SOLDC. Limits to development are needed to minimise adverse impacts on the landscape, residents' amenity and the transport network.</p> <p>Visual Impact Assessments indicate that development (for</p>

Partners (on behalf of BHA)	<ul style="list-style-type: none"> • Policies should emphasise important contribution Airport makes to London and South East economy, as the only purely business aviation airport in London attracting high net worth individuals. Sector has been phased out at London's larger airports 	<p>example of additional larger hangars) has different impacts when located in different sections of the SOLDC. The AECOM studies to date have demonstrated that in order to minimise harm to the remaining Green Belt, it is essential to control and in some cases restrict uses to particular locations. This is best achieved by identifying land parcels with clear policy frameworks.</p> <p>The draft policies, in tandem with proposals to release certain parcels from the Green Belt, help steer growth towards parcels most beneficial to economic growth while limiting expansion of parcels most exposed to surrounding environments and communities.</p>
2 individuals; Petts Wood & District Residents' Association	<p>Partial support for proposed policy changes (triangle of land south of South Camp):</p> <ul style="list-style-type: none"> • Supports release of triangle of land south of South Camp from Green Belt 	Support for Green Belt release of this land is noted.
3 individuals; Petts Wood & District Residents' Association	<p>Partial support for proposed policy changes (West Camp):</p> <ul style="list-style-type: none"> • Support removal of West Camp from Green Belt, provided it assists area's regeneration • Potential development should not impact on St Georges Chapel and the Gate Guardians 	<p>Support for Green Belt release of this land is noted.</p> <p>The LBB is undertaking focused design studies for West Camp, in collaboration with key stakeholders such as Historic England. This exercise is expected to provide outputs relating to the future use of land in West Camp including heritage assets.</p>
Interflight; Shipping & Airlines Ltd); JETS (Biggin Hill) Ltd; Cirrus Aircraft, H S Walsh and Sons; London First (independent business organisation of which BHA is a member)	<ul style="list-style-type: none"> • Land north of East Camp should be included in SOLDC boundary 	The LBB has taken into account updated advice from AECOM, which considers development potential and impact of this land in the context of the Green Belt and the economic prospects for Biggin Hill. It is considered that the current SOLDC boundary is sufficient to carry out the functions of the Biggin Hill SOLDC over the Local Plan period. No further amendments are recommended.
Ms Judith Niechcial	<ul style="list-style-type: none"> • Support expansion of Airport north of Terminal Area 	The LBB has taken into account updated advice from AECOM, which considers development potential and impact of this land in the context of the Green Belt and the economic prospects for Biggin Hill. The land parcel to the north of the Terminal Area is identified as providing a buffer between the

		more intensive Airport functions to the south and sensitive landscapes and communities of Leaves Green to the north. It is considered that there is no sufficient economic justification to release further land in this section of the Airport. Further intensification of development on this land is not recommended.
Hayes Village Association	<ul style="list-style-type: none"> Suggest SOLDC boundary should embrace Biggin Hill Locally Significant Industrial Site (LSIS), not just Airport 	The SOLDC boundary continues to incorporate the Biggin Hill LSIS to the south.
3 individuals; Hayes Village Association; Bromley Friends of the Earth	<p>Question impetus for SOLDC boundary and Green Belt amendments:</p> <ul style="list-style-type: none"> Emerging Local Plan process cannot adequately assess importance of Airport as SOLDC designation already earmarks expansion LBB should retain “small airport” nature of land use. Airport does not have level of significance to justify expansion Question how significant economic benefits to Bromley and the wider economy can be estimated when nature and scale of potential development remains unspecified Proposed amendments need more detailed analysis to justify exceptional circumstances No hard evidence to show pressing need to realise potential of SOLDC or inability to meet need under existing Green Belt policy Any development should make use of existing developed land. Proposed policy changes allow commercial reasons to trump all other considerations, in contrast with current Unitary Development Plan (UDP) which presents balanced consideration of issues More detailed analysis for each key area required. Three areas for Green Belt release extend significantly beyond UDP Major Developed Site Areas 1 and 3 No assurance that jobs created would benefit local residents Query where new employees would live, how they would travel to and from work 	<p>The London Plan and its supporting evidence base and supplementary planning guidance provide impetus for the LBB to consider the most sustainable approach to further developing the Biggin Hill Airport.</p> <p>Independent studies produced by URS and AECOM acknowledge that policy restrictions such as the Green Belt create a degree of uncertainty for businesses seeking to locate in the SOLDC. These studies provide recommendations for policies and Green Belt amendments that would promote a level of economic growth consistent with the SOLDC designation, while minimising adverse impacts on sensitive receptors surrounding the Airport.</p> <p>Upgrades to the surrounding transport network are also identified and prioritised in the accompanying draft Infrastructure Delivery Plan (IDP). These upgrades will help to promote growth in the SOLDC and make Biggin Hill are more attractive business and employment destination for communities in the Borough.</p>
3 individuals; Bromley Friends of the Earth); Hayes Village Association	<p>Question accuracy of job projections:</p> <ul style="list-style-type: none"> Projections for 3,000 new jobs are optimistic Emerging Local Plan package misquotes URS supporting study, which questions increases in Airport employment by 40-50%, states they are not aligned with Oxford Economics and GLA projections Question whether consequences of not achieving job projections have been considered 	An employment forecast of 2,300 new jobs for the SOLDC was proposed by Nathaniel Lichfield & Partners (NLP) on behalf of Biggin Hill Airport Limited in its Concept Plan submitted to the LBB for consideration prior to the 2015 DAFPD consultation. Independent advice provided by AECOM for the LBB considered that the forecast put to the LBB, which includes employment growth in the Biggin Hill Locally Significant Industrial Site, was ambitious but not unachievable. Following review of representations to the 2015 DAFPD consultation, and of further advice from AECOM, it is considered that the LBB’s proposed draft policies and Green Belt amendments continue to provide an adequate basis for economic growth for the Local Plan period and beyond.
3 individuals; Hayes Village Association	<p>Question analysis of infrastructure to support proposed policy changes:</p> <ul style="list-style-type: none"> No reference made to consequential costs to LBB, local residents PTAL rating demonstrates transport infrastructure is currently poor. Specific staging 	Upgrades to the surrounding transport network are identified and prioritised in the accompanying draft IDP. These upgrades are contingent on development proposals coming

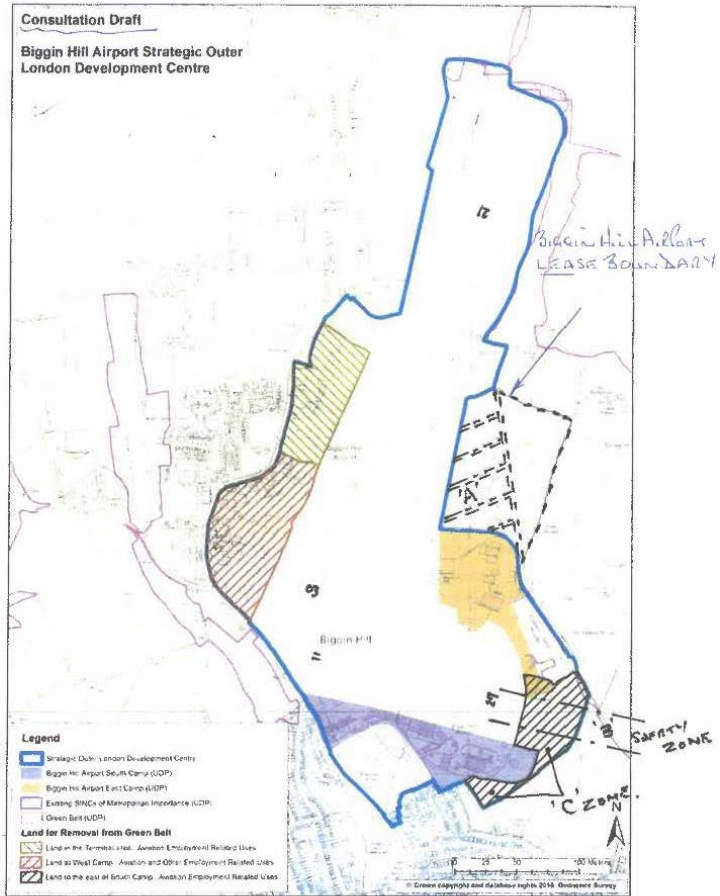
	<p>needed in parallel with gradual improvements to infrastructure, whilst also protecting residential amenity</p> <ul style="list-style-type: none"> • SOLDC designation and URS, AECOM supporting studies do not appear to take into account current poor infrastructure • Emerging Local Plan package job projections increased from 2,300-3,000 jobs. Question if infrastructure servicing has considered this 	<p>forward and therefore funding mechanisms would be identified at the time of determining those planning applications.</p>
1 individual	<p>Consistency with GLA policies:</p> <ul style="list-style-type: none"> • Emerging Local Plan package does not properly address the SOLDC implementation guidelines in the Mayor's <i>Town Centres Supplementary Planning Guidance</i>, in particular regarding accessibility, green belt, heritage, environmental quality nor safeguarding residents' amenity. No evidence on educational and training objectives 	<p>The draft Local Plan policies have regard to the SOLDC Implementation Guidelines as outlined in the Mayor's Town Centres SPG. The proposed policies recognise the specific land uses outlined for Biggin Hill in these guidelines, while allowing a degree of flexibility for certain uses that reinforce the role of the SOLDC and do not impede the operation or capacity of aviation-related functions. They require that development proposals respond to constraints and sensitivities within and in the vicinity of the SOLDC. Upgrades to the surrounding transport are also identified and prioritised in the accompanying draft IDP.</p>
1 individual	<p>Consistency with current Airport lease:</p> <ul style="list-style-type: none"> • Emerging Local Plan package states employment growth would not increase number of flights as per existing lease, which is for maximum of 125,000 flights per year. Airport management state that future flight movements would not exceed 50,000 per year. Local Plan requires correction to bring this up to date. 	<p>The draft Local Plan policies take into account the terms of the current lease.</p>
4 individuals; Downe Residents' Association; Petts Wood & District Residents' Association	<p>Question removal of UDP statements:</p> <ul style="list-style-type: none"> • Objects to removal of existing UDP objectives • Suggest retaining Section 12 objective 1. <i>To strike a balance between recognising the social and economic benefits of the Airport and the adjoining Business Area and minimising the environmental impacts, particularly those related to the Green Belt, noise, surface access and the amenities of those affected by airport operations</i> • Objects to removal of site description under Section 12, Para 12.1 • Objects to removal of UDP Policy BH1, which states that LBB will seek to protect amenities of those affected by airport operations should be carried forward into the Local Plan. 	<p>The Emerging Local Plan updates the policy content for Biggin Hill to ensure it is in line with the area's SOLDC designation. Notwithstanding this, the draft policies also acknowledge environment and community related sensitivities within and in the vicinity of the SOLDC and require that any development proposals appropriately respond to these.</p>
1 individual; London Wildlife Trust; Woodland Trust	<p>Consideration of Darwin's Landscape Laboratory Tentative World Heritage Site listing and Sites of Importance for Nature Conservation (SINC):</p> <ul style="list-style-type: none"> • Concerned about implications of proposed Green Belt amendments in respect of proposed World Heritage Site (WHS), including Down House and surrounding landscape • Mayor's <i>London's world heritage sites: guidance on settings supplementary planning guidance</i> must be taken into account • Must give consideration to NPPF para 132 and London Plan 2015 (FALP) pp. 14 and 18 • No assessment of impact upon the WHS has been undertaken • Development should not be visible from Down House and Downe Valley • Concerned about implications for current SINC to east of East Camp as well as 	<p>Under the 2012 SPG, the Tentative Listing contains a buffer zone which adjoins parts of the SOLDC boundary to the east. Whilst there is no statutory requirement for the Local Plan to consider Tentative Listings, the draft policies acknowledge and respond to the sensitivities of this area. No further amendments to the Green Belt are proposed on the eastern boundary of the SOLDC and development outcomes are sought that do not have an unacceptable adverse impact on adjoining land to the east.</p>

	<p>proposed new SINC on south-eastern boundary</p> <ul style="list-style-type: none"> SOLDC contains area of ancient woodland to east of site, with small section of this woodland located within SOLDC boundary. Essential that woodland is fully protected from development and that an appropriate buffer maintained to ensure no future damage or loss 	
2 individuals; Aperfield Green Belt Action Group; Petts Wood & District Residents' Association	<p>Concerns over further expansions:</p> <ul style="list-style-type: none"> Objects to development of Green Belt land between Milking Land and Downe Roundabout. Concerned about potential development in north west of Airport land Question need for SOLDC boundary to extend beyond northern end of runway Request resisting any expansion of SOLDC boundary, which is relatively new designation dating from 2010. Should be no moves to expand it just 4-5 years after initial designation 	Refer to above comments
1 individual	<ul style="list-style-type: none"> Objects to expansion of Airport in East Camp 	Refer to above comments
4 individuals; London Wildlife Trust; Orpington Field Club; Petts Wood & District Residents' Association; Downe Residents' Association;	<p>Question suitability of proposed Green Belt release (land east of South Camp):</p> <ul style="list-style-type: none"> Object to removal of land east of South Camp from Green Belt, as it is part of WHS setting and adjoins SINC Any development here would be clearly visible from area to the east and wider area including Berry's Green and Cherry Lodge Golf Club Business demand would be least in the land east of South Camp and would not justify expansion 	The LBB has received updated advice from AECOM, which reiterates previous advice that the Land East of South Camp can accommodate further growth while accounting for sensitivities in the vicinity of the SOLDC. It is considered that the previous recommendation to release this parcel from the Green Belt still stands. The draft policy requires that all development in this parcel be for aviation-related employment generating uses and does not support any development that would have an unacceptable adverse impact on sensitive environments in the vicinity of the parcel, including the adjoining SINC.
2 individuals; Petts Wood & District Residents' Association	<p>Question suitability for proposed Green Belt release (Terminal Area):</p> <ul style="list-style-type: none"> Objects to removal of Terminal Area from Green Belt, as this would result in overdevelopment and degradation of area Green Belt release would create pressure to develop land further north 	Following receipt of further advice from AECOM, it is considered that the previous recommendation to release this parcel from the Green Belt still stands. Land further to the north of the Terminal Area should remain in the Green Belt to provide a land buffer between growth areas of the Airport to the south and sensitive receptors in Leaves Green to the north.
2 individual	<p>Question suitability for Green Belt release (West Camp):</p> <ul style="list-style-type: none"> Suggests better utilising West Camp but does not agree the whole area needs to be removed from Green Belt to enable suitable redevelopment 	The LBB has taken into account further advice from AECOM recommending that West Camp be released from the Green Belt to promote a positive economic outcome. It is considered that the previous recommendation to release this parcel from the Green Belt still stands.
1 individual	<p>Question suitability for further development (South Camp):</p> <ul style="list-style-type: none"> Objects to expansion of Airport in South Camp 	South Camp is considered to be a key land parcel for promoting economic growth in line with the area's SOLDC designation. The draft policy for South Camp promotes further expansion of the parcel, but does not support any development that would have an unacceptable adverse impact on sensitive environments in the vicinity of the

		SOLDC.
3 individuals; Orpington Field Club; Petts Wood & District Residents' Association; Downe Residents' Association	Concerns about impacts on amenity of proposed policy changes: <ul style="list-style-type: none"> Objectives of Noise Policy Statement for England not addressed, nor Government's overall policy to limit and reduce number of people significantly affected by airport noise, set out in Aviation Policy Framework. Noise pollution in eastern area would increase for Darwin's Landscape Laboratory, Cudham, Berry's Green Air pollution of car and air traffic would increase Proposed amendments would impact directly on communities on and around Downe Road Further clarification needed on definition of 'environment' in relation to Airport uses. Airport affects broader catchment than just surrounding area 	A draft policy for Noise Sensitive Development in Biggin Hill is proposed. This policy takes into account current planning practice guidance that sets out the noise exposure hierarchy, which reflects Noise Policy Statement for England. The draft Local Plan supports growth in the SOLDC that minimises adverse impacts on the environment and the amenity of surrounding communities. Development in certain land parcels in the SOLDC will not be supported if it would have an unacceptable adverse impact on surrounding environments.
2 individuals	Concerns about safety implications of proposed policy changes: <ul style="list-style-type: none"> Expansion of airport could present safety implications due to aircraft volumes Concerned about inclusion of Gas Storage Station land as operational Airport land, presenting potential safety and gas supply issues 	Development in the SOLDC must be consistent with the draft policy for Airport Public Safety as outlined in the draft Local Plan. The location of the Gas Storage Station land does not preclude the currently proposed policy changes. This land is not proposed to be released from the Green Belt and further growth in the SOLDC will be supported in areas a substantial distance away from this site.
1 individual	Consideration of other potential land uses in SOLDC boundary: <ul style="list-style-type: none"> LBB ought to consider other uses, including industrial, commercial and agricultural. Aviation related uses will not provide employment commensurate to extent of land to be released 	In order for positive economic outcomes to be realised in the SOLDC across the Local Plan period, it is appropriate that the draft policies promote a balance of both aviation and non aviation-related employment generating uses. The draft policies allow a degree of flexibility in certain land parcels in the SOLDC, provided that these uses reinforce the role of the SOLDC, as described in the Local Plan, London Plan and the Mayor's Town Centres SPG.
1 individual	Mapping comments: <ul style="list-style-type: none"> Suggested map comments (See attached map) Zone A – land north of East Camp does not form part of Airport's operational area, should be released to Airport for development Zone B – part of proposed "land east of South Camp" requires large safety area at threshold of runway 29, will limit development of area 	It is considered that the current SOLDC boundary is sufficient to carry out the functions of the Biggin Hill SOLDC over the Local Plan period. No further amendments are recommended. The proposed draft policies and Green Belt amendments provide a positive basis for economic growth in the SOLDC whilst taking the operational elements of the Airport into account. Further, the draft policy for South Camp supports redevelopment and/or realignment of infrastructure to allow for expansion of aviation-related employment generating uses. This provides a degree of flexibility for for the format of airside land in this parcel of the SOLDC.

- Zone C – part of proposed “land east of South Camp” is used for overspill parking when business events take place at Rizon jet and other companies within Airport, therefore area is already utilised

**Extract from London Borough of Bromley Local Plan Draft:
Proposed Amendment to Green Belt within the Biggin Hill SOLDC**



INCLUDE ZONE 'A' EEEEE

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Working in Bromley – Crystal Palace Strategic Outer London Development Centre

Proposal at time of 2015 Draft Allocations, Further Policies and Designations: Establish Outer London Development Centre (SOLDC) Boundary and policy

14 responses were received – 1 letter, 7 emails, 6 online responses.

Respondent	Summary of issues	Officer comment
English Heritage	Minor changes suggested to the proposed SOLDC policy wording to better reflect the importance of heritage assets in site regeneration.	Agree. Consideration will be given to amending the proposed SOLDC policy with the suggested wording.
London Borough of Croydon	Lends support to the proposed Strategic Outer London Development Centre Boundary.	Support noted.
Greater London Authority Transport for London	Common concern re: SOLDC boundary GLA: Request that the proposed SOLDC boundary be widened to areas of Penge, Crystal Palace and Anerley to capture the wider benefits of the designation. TFL lends support to the GLA with regards to this point.	The scoping exercise associated with the proposed definition of the SOLDC boundary did not identify development capacity or assets which could generate growth of more than subregional importance in areas of Penge, Crystal Palace and Anerley which could justify their inclusion within the boundary of the Crystal Palace SOLDC beyond that which is proposed. The Draft policy and its associated supporting text however recognise the integration of the proposed Crystal Palace SOLDC with the wider Crystal Palace, Penge and Anerley renewal area.
Transport for London	States that additional development capacity should be identified to align with the London Plan in surrounding areas. States its intention to cooperate with the London Borough of Bromley in relation to the potential role of transport in the implementation of the SOLDC.	Noted. As above, the scoping exercise associated with the proposed definition of the SOLDC boundary did not identify development capacity or assets which could generate growth of more than subregional importance in areas of Penge, Crystal Palace and Anerley which could justify their inclusion within the boundary of the Crystal Palace SOLDC beyond that which is proposed. As required by London Plan policy, the SOLDC's boundary has been drawn around the parts of Crystal Palace which comprise strategic functions of more than subregional importance and with the potential to generate growth at this level as set out in the supporting SOLDC's evidence base paper. Noted. The Council will welcome TFL's cooperation in relation to the implementation of the SOLDC
The Caravan Club	Supports its proposed inclusion as part of the SOLDC boundary to ensure the continued provision of its specific tourist and visitor accommodation Suggests the provision of more detailed policies regarding how the SOLDC's existing uses would be protected and enhanced.	Support noted. Noted
Crystal Palace	Welcomed the SOLDC designation on the basis of its sports and leisure function	Support noted.

Sports Association	<p>Suggests investing in the provision of services supporting health and wellbeing as well as the park's economic sustainability to support the SOLDC's specialist strengths</p> <p>Requests that any proposals for the SOLDC should avoid disjointed planning leaving out the National Sports Centre which could particularly undermine its specialist sports/leisure strength and community offering.</p> <p>Refutes the qualification of the National Sports Centre as a "declining sports centre" as described in the supporting text of the proposed policy</p>	<p>Noted</p> <p>Noted</p> <p>Agree. The adjective "declining" will not be used to describe the sport centre within the policy and where appropriate, the evidence supplied to identify its strengths will be referenced within the supporting Background Paper.</p>
1 individual; Orpington Field Club (OFC) & the London Wildlife Trust (LWF)	<p>Common concern re: biodiversity Wording suggested to be added in the context section LWT) –in the supporting text (OFC), and in the main body of the text (1 individual) recognising the importance of the wildlife and biodiversity value of the site</p> <p>OFC: Suggests wording describing the type of wildlife which can be found on the site to justify the rationale of defining the boundary of the SOLDC</p>	<p>Recommend to agree. Due consideration will be given to adding the suggested wording to draw attention to elements of biodiversity value in CPP in the main body of the policy and in the supporting text rather than in the "planning context" section which sets out a more generic and specific policy framework to the SOLDC.</p> <p>The biodiversity value of the site did not inform the rationale for defining the SOLDC's boundary however consideration will be given to describing the biodiversity features of the site in more detail within the supporting SOLDC Background Paper.</p>
The Woodlands Trust (WF)	<p>Concern over the adequate protection of veteran trees. Reference NPPF and BS 5837:2012 protective guidelines</p>	<p>Noted. It is anticipated that other emerging policies of the Draft Local Plan will provide veteran trees with the adequate level of protection and reference the appropriate policies, guidance and guidelines.</p>
South London Green Chain Group (SLGCG)	<p>Requests that the Green Chain designation apply to Crystal Palace Park in the Local Plan.</p>	<p>Agree. Once the Local Plan is adopted the Planning Policy maps will be amended in order to show that the Green Chain designation applies to Crystal Palace Park, in compliance with the route suggested by the SLGCG.</p>
Seven individual comments	<p>Concerns that the proposed SOLDC designation on Crystal Palace Park conflicts with existing designations and could be used to override other existing planning designations to enable development on inappropriate sites which should be ruled out of the boundary</p> <p>Perceived lack of evidence in identifying the SOLDC boundary. Area which cannot accommodate development should not be included.</p> <p>It is important to recognise the historic importance of the park and its recreational value in view of rising health issues</p>	<p>Noted. The proposed policy as currently worded fully recognises all other planning designations applying to the proposed Crystal Palace area.</p> <p>Noted. The proposed boundary of the SOLDC, rather than coinciding with a proposed development site, reflects the area which includes the assets considered as having the potential to generate growth within the wider Crystal Palace area of influence, as explained in more detail in the supporting Background Paper which justifies how the boundary was drawn.</p> <p>Noted. Proposed policy as currently worded fully recognises historic and recreational importance</p>

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

ENVIRONMENTAL CHALLENGES

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Environmental challenges

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
Spatial Strategy	Savills for Thames Water	<p>Thames Water seeks to be consulted on the Site Allocations document. To enable Thames Water to make a detailed assessment of the impact of proposed housing provision they would require details of the location, type and scale of development together with the anticipated timing of development.</p> <p>In general terms, Thames Water’s preferred approach for growth would be for a small number of large clearly defined sites to be delivered than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades.</p> <p>As a general comment, the impact of brownfield sites on the local sewerage treatment works is less than the impact of greenfield sites. This is due to the existence of historical flows from brownfield sites, as opposed to greenfield sites that have not previously been drained. The necessary infrastructure may already be in place for brownfield development. We would therefore support a policy that considers brownfield sites before greenfield sites.</p> <p>On brownfield sites there may be:</p> <ul style="list-style-type: none"> - Existing water mains crossing the site. In such cases the developer may be required to pay for any mains diversions and new off-site infrastructure. - Existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by an Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989. <p>Where development is being proposed within 800m of a sewerage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.</p>	Thames Water were consulted on the Draft Allocations document which included proposed site allocations. Comments were received on the preferred allocated sites for housing and mixed use development.
New policy recommended	Thames Water	<p><u>Water and Wastewater Infrastructure Capacity</u></p> <p>Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. Therefore, Thames Water relies heavily on the</p>	Draft policy included for consultation.

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
		<p>planning system to ensure infrastructure upgrades are provided ahead of development either through phasing and Local Plan policies, or the use of Grampian style conditions attached to planning permissions.</p> <p>In line with paragraph 156 of the NPPF and Policy 5.14 of the London Plan, Thames Water seeks the following policy and supporting paragraph to be included in the local plan:</p> <p>Proposed new policy:</p> <p><i>“Planning permission will only be granted for developments which increase the demand for off-site water and wastewater infrastructure where:·</i></p> <ol style="list-style-type: none"> <i>1) Sufficient capacity already exists; or</i> <i>2) Extra capacity can be provided in time to serve the development that will ensure that the environment and the amenities of other users are not adversely affected.</i> <p><i>In accordance with the National Planning Policy Guidance, when there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements that will be completed prior to occupation of the development.”</i></p> <p>Proposed new policy supporting text:</p> <p><i>“The local planning authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements are programmed by Thames Water (or any successor), the Local Planning Authority will require the developer to provide for appropriate improvements that must be completed prior to occupation of the development.”</i></p> <p>Where there is a capacity constraint and upgrades to water and wastewater infrastructure are necessary such improvements should be secured by a Grampian style condition.</p> <p>Developers should consult with Thames Water as early as possible regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time should be allowed so that an informed response can be formulated. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time required for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Should more comprehensive responses be required, it is likely that more detailed modelling work</p>	

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
		<p>will need to be undertaken. The necessary funding for this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.</p> <p>Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months while sewage treatment and water treatment works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. Thames Water would welcome the opportunity to discuss funding arrangements for upgrades not planned within the current 5-year planning period.</p>	
Objectives – Environmental Challenges	The Beckenham Society	Add to final bullet after “reduce air pollution” add “including aircraft noise and vapour”.	No change recommended. Not necessary to list specific types of pollution.
Chapter 10	Savills for Thames Water	<p>Thames Water supports the approach in the London Plan Section 5.13 (Sustainable Drainage) and the Mayor’s sequential approach to surface water run-off and its management as close to source as possible. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage thus reducing the risk of sewer flooding.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of our customers.</p> <p>Accordingly, in the disposal of surface water, Thames Water will:</p> <ul style="list-style-type: none"> a) Seek to ensure that new connections to the public wastewater network does not pose an unacceptable threat of surcharge, flooding or pollution; b) Check the proposals are in line with advice from the DEFRA, which encourages, wherever practicable, disposal ‘on site’ without recourse to the public wastewater network; for example in the form of soakaways or infiltration areas on free draining soils; and c) Require the separation of foul water and surface water on all new developments. <p>Climate change is a vitally important issue to the water industry. Not only is climate change expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water recommends the inclusion within the document of policies in respect of water conservation and the efficient use of water.</p> <p>Regardless of the option chosen for the location of housing within Borough, any new development should reflect the need for water conservation. The reason for this is that demand for water has been steadily increasing and with factors such as increasing population, wider use of water consuming appliances and climate change, demand is expected to increase further. The promotion and adoption of water efficient practice in new developments will help to manage</p>	The policies covering water conservation in the London Plan – giving a maximum mains water consumption for residential development - can be directly applied in the borough. It is not considered necessary to add a local policy.

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
		water resources and work towards sustainable development.	
Chapter 10	English Heritage	Environmental challenges, p21 It will be helpful for the clarity of the plan to provide a definition of environmental matters within the glossary. The NPPF defines the historic environment clearly as a matter to be considered as an aspect of the environment within the three dimensions of sustainable development (para 7, NPPF). This section on pages 21/22 addresses the environment principally in the sense of natural resources when referring to environmental impacts. Perhaps a cross-reference to the broader NPPF definition of the environment would ensure that where the subject is addressed more generally in plan policies that this is readily understood to include the historic environment.	Consider glossary amendment
Chapter 10	English Heritage	Supports the incorporation of energy efficiency measures in existing buildings to combat climate change. We would, however, seek to ensure that plan policies promote sensitivity in relation to historic buildings and that adaptation is based on a careful assessment of the heritage significance of the building.	Noted.
Policy 10.1 – Sustainable Waste Management	London Borough of Bexley	Bexley supports and agrees with policy 10.1 regarding Sustainable Waste Management. In regards to the table provided in the supporting text for this policy, please find attached an updated table of the South East London Borough's waste apportionment figures, updated in December 2013.	Support welcomed. Collaborative work with neighbouring boroughs is ongoing.
Policy 10.1 – Sustainable Waste Management	GLA	The GLA support Bromley Council's focus on the waste hierarchy and managing waste locally through the South East Group arrangements. However, as Bromley Council is part of the South East Joint Waste Planning Group, the Core Strategy should confirm that Bromley Council has formally agreed to pool its apportionment with the South East boroughs. The GLA would also like to see a clear reference to/relationship with the South East Waste Technical Paper (a live document) that identifies sites in Bromley for meeting its apportionment. Bromley's core strategy as it stands does not clearly do this; the technical paper should therefore provide further information on the activities at the sites identified that count towards apportionment and the tonnages. Bromley's proposed future strategy to waste management (page 199) that is to use the excess existing capacity in boroughs such as Bexley rather than allocate further waste management facilities within the Borough is not an acceptable approach and is not in line with London Plan Policy 5.17. The agreements that are in place for Bexley and 'other boroughs' to help meet Bromley's apportionment in future years should be set out in the technical paper and made clear in the core strategy. The figures in the apportionment table on page 199 will need to be updated to reflect the latest figures in FALP. A flexible approach to waste apportionment should be taken should the revised figures in FALP not be adopted.	Technical paper is being updated in collaboration with neighbouring boroughs.
Policy 10.1 – Sustainable Waste Management	London Borough of Greenwich	In Section 10 it is stated that once the Cookham Road anaerobic digester facility is operational, the intention is to offer any excess capacity to other boroughs. The South East London Joint Waste Group has not yet determined what should happen to any excess in the group's capacity, Any increase in Bromley's waste capacity should be pooled with the other SE facilities and the decision on how this should be treated needs to be taken by the group as a whole. The document should be reworded to reflect this.	Noted.
Policy 10.2 – New waste management facilities	GLA	On Policy 10.2 New Waste Management Facilities, the Core Strategy should, when considering planning applications for new waste facilities, reference the criteria in London Plan Policy S.17, notably the carbon Intensity floor CO2 performance for waste-to energy facilities.	Amended text for consistency.

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
Policy 10.3 – Reducing flood risk	Mark Budd, Green Chain Working Party	Supporting text: After The London Plan reiterates the national importance given to flood risk assessment, advising Boroughs that they should use Strategic Flood Risk Assessments when developing their Local Plans, identify areas with surface water management problems and encourage development to use Sustainable Urban Drainage Systems (SUDS). add “Supplementary Planning Guidance in the All London Green Grid implementation framework details the key role green infrastructure provides in reducing flood risk, and includes projects in the borough which seek to mitigate flood risk.”	Amendment not considered necessary.
Policy 10.3 - Reducing Flood Risk	Thames Water	The flood risk policy should make reference to all forms of flooding including sewer flooding. Surface water flows reduce the capacity in the sewers for foul sewage and this is the main cause of sewer flooding. It is therefore important to reduce surface water flows entering the wastewater network therefore reducing the risk of sewer flooding.	Revised to include all forms of flooding
Policy 10.3 – Reducing flood risk	Natural England	Under section 10 Environmental Challenges it is good to see the policies under Flood Risk – 10.3 and 10.4 (Reducing Flood Risk and Sustainable Urban Drainage Systems (SUDS) respectively) as these in combination make for a strong policy position regarding the use of SUDs in new development. This will help with future proofing as well as creating better local environments for better health and wellbeing of residents and visitors to the area. This policy area is backed up by conclusions drawn in section 20.1.20 of the SA as the results are predicted to be significantly positive, provided they are implemented.	Support welcomed.
Policy 10.4 - Sustainable Urban Drainage Systems, Pages 203-204	Thames Water	As part of any Flood Risk Assessment, Thames Water seeks that information is provided to show that development will not result in any adverse impact on the risk of flooding off site as a result of discharges from the development.	Noted.
Policy 10.7 – Air Quality	Natural England	Policies around Renewable energy and Air Quality (10.11 and 10.7 respectively) are welcomed as these will help to ensure that the borough makes moves toward a greener future that is more in accordance with targets set out in the NPPF and other legislation.	Support welcomed.
Policy 10.9 – Light Pollution	Ishpi Blatchley Bromley Biodiversity Partnership	Welcome light pollution controls as per 10.9 iv, but concerned that there is insufficient understanding of the importance of dark skies for foraging bats, particularly along watercourses, but also along woodland edge habitat, hedgerows and other areas of natural habitat. Where lighting is necessary it should be very carefully directed so as not to spill over into areas of natural habitat. Along paths adjacent to water courses and ponds it should not spread over the water.	Support welcomed. Concerns noted.
Policy 10.9 – Light pollution	Judith John Orpington Field Club	The Orpington Field Club welcomes light pollution controls as per (10.9 iv), but is concerned that there is insufficient understanding of the importance of dark skies for foraging bats, particularly along watercourses, but also along woodland edge habitat, hedgerows and other areas of natural habitat. Where lighting is necessary it should be very carefully directed so as not to spill over into areas of natural habitat. Along paths adjacent to water courses and ponds it should not spread over the water.	As above.
Policy 10.11 – Carbon reduction	GLA	The GLA welcomes the inclusion of the energy hierarchy. It is acknowledged that in Bromley there may be limited opportunities to fully implement the second element of the energy hierarchy (supply energy efficiently). Therefore, Policy 10.11 should place more emphasis on reducing emissions through design and fabric measures in line with the <i>first</i> element of the energy	Amendments made to ensure greater emphasis on first element of energy hierarchy. Aim of London Plan policy noted.

Objective / Policy / issue	Respondent	Summary of issues	Officer Comment
		<p>hierarchy. The final sentence in Policy 10.11 should begin with 'Finally' to note that this is the third element of the energy hierarchy. The specific 20% renewable energy target is generally not included in the overarching policy, however given the general nature of development in Bromley in this instance there is no objection. The strategic aim of London Plan Policy 5.2 to minimise carbon dioxide emissions including the emissions generated from non-regulated energy use should not be confused with the specific carbon dioxide reduction for major developments (currently 40% beyond Part L 201 0 of the Building Regulations). As this latter target is based on the Building Regulations It only applies to regulated emissions.</p> <p>With regards to the second paragraph of the supporting text, the practice should be to secure a method of complying with the carbon dioxide targets at planning application stage. This is more likely to ensure that measures are designed into schemes and not simply bolted on afterwards, which often costs more and result in a less sustainable solution. Once outlined, securing sustainability measures by condition is welcomed.</p> <p>The 'be clean paragraph' could note the potential emergence of Bromley Town Centre as an Opportunity Area and therefore greater potential to support districting heating/energy in the future.</p>	

Responses to Draft Allocations, Further Policies and Designations consultation 2015 – Update June 2016

Environmental Challenges – General

5 responses were received – 5 emails

Respondent	Summary of issues	Officer comment
Savills for Thames Water	<p>Thames Water are keen to work with the Council and developers to ensure that development is delivered alongside any necessary water and waste water infrastructure upgrades that are required to support it.</p> <p>Reiterate the requirement for additional supporting text and a policy on water and wastewater infrastructure within the new Local Plan as set out in response to the Consultation in March 2014.</p> <p>Site specific comments are made for proposed housing and mixed use sites.</p>	<p>The suggested new policy on water and waste water infrastructure will be included in the draft plan.</p> <p>Comments on individual sites have been considered alongside other representations for those sites.</p>
Environment Agency	<p>Flood risk Policies and site allocations should ensure no inappropriate development is located in areas of high risk flooding. Some allocation sites are within flood risk locations. Clarification is needed to demonstrate how these sites were sequentially tested against flood risk;</p> <p>The Council should identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under Duty to Cooperate work to manage and resolve any cross boundary risks. It is recommended that the Strategic Flood Risk Assessment should be updated to inform the sustainability appraisal</p> <p>It is unclear whether flood risk has been considered against the information within the old assessment or using the latest available</p>	<p>Flood risk has been taken into account in the site assessment process and will be supplemented through the revision to the Strategic Flood Risk Assessment.</p> <p>The SFRA update will include identification of all sources of flooding.</p> <p>The data used at the time of the assessment was up-to-date and not that published in the 2008 SFRA.</p>

**REPRESENTATIONS RECEIVED DURING EMERGING LOCAL PLAN
CONSULTATIONS (2014 DRAFT POLICIES AND DESIGNATIONS AND
2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND DESIGNATIONS)**

MONITORING AND IMPLEMENTATION

Responses to Draft Policies and Designations consultation 2014 – Update June 2016

Monitoring and Implementation

Objective/ Policy / Issue	Respondent	Summary of issues	Officer Comment
11.1 Delivery and Implementation of the Local Plan	London Fire and Emergency Planning Authority (LFEPa) – Dron & Wright	Although noting the Bromley have not drafted a preliminary draft Community Infrastructure Levy charging schedule – text states that redevelopment/relocation of Fire station at South Street will depend on achieving the required funding – therefore requests that funding for this matter be included within the Borough’s Regulation 123 List.	Request will be reviewed as CIL development progresses.
11.1 Delivery and Implementation of the Local Plan Page 214-215 Community Infrastructure Levy/Planning obligations_Page 216-217	Thames Water; Utilities – (Savills)	<p>Requests the following policy be included :- <i>The development or expansion of water and wastewater facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provision of the Development Plan, or in the interests of long term water supply and wastewater management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</i></p> <p>Thames Water understands it cannot require Section 106 Agreements be used to secure water and wastewater infrastructure upgrades. However, essential to ensure that such infrastructure is in place to avoid unacceptable impacts on environment, e.g. internal and external sewer flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated no/low pressure supply.</p> <p>Important that developers demonstrate adequate capacity exists both on and off site to serve development and that it would not lead to adverse amenity effects for existing users. In some circumstances may be necessary for developers to carry out appropriate studies to ascertain whether proposed development will lead to overloading of existing water and wastewater infrastructure. Where there is a capacity constraint and no improvements programmed by water company, then developer needs to contact Thames Water to agree what improvements required, how they will be funded prior to any occupation. Considered that additional policies required within Local Plan to ensure any necessary water or wastewater infrastructure upgrades are delivered prior to occupation of development.</p>	<p>Incorporated - see Environmental Challenges Chapter.</p> <p>Noted</p> <p>Noted</p>
11.1 Delivery and Implementation of the Local Plan	NHS Healthy Urban Development Unit	Note Infrastructure Delivery Plan is prepared and site allocations are being identified. Role of planning to help provide and financially secure new sites and facilities and dispose of and rationalise NHS estate should be considered and we strongly encourage Council to work with and support CCG, NHS England and NHS Property Services. Infrastructure Delivery Plan should make use of latest population projections and HUDU Model to estimate the future health service requirements and cost impacts which should be refined having regard to commissioning and estate plans. Requirements should be monitored over time to ensure provision matches housing and population growth, particularly in renewal areas/centres.	The latest draft Infrastructure Delivery Plan (IDP) incorporates latest population projections and HUDU evidence as advised

**REPRESENTATIONS RECEIVED FOR FOCUSED CONSULTATIONS
FOLLOWING 2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND
DESIGNATIONS**

**ADDITIONAL AREAS OF SPECIAL
RESIDENTIAL CHARACTER**

Response to a proposal for an additional Area of Special Residential Character made as part of the Local Plan's Consultation on the Statement of Community Involvement 2016 – June 2016 Update

This comment was made via the Council's Consultation Portal.

Proposal at time of 2016 consultation:

Do not consider the Cray Valley West Ward the area generally defined as St Paul's Cray and St Mary Cray for the ASRC designation.

Respondent	Summary of issues	Officer comments
Chislewick Residents Association	The Chislewick Residents Association requested that "as a local residents' association representing over thirty roads in the Cray Valley West Ward, [...] our Ward, and the area generally defined as St Paul's Cray and St Mary Cray should be considered as [...] an Area of Special Residential Character, recognising the historical commitment to low density housing with high spatial standards with public/private amenity space".	<p>Cray Valley West Ward combined with the area known as St Mary Cray, part of which is included in the adjacent Cray Valley East Ward, is over 1000 ha. The area is too large to be assessed as an Area of Special Residential Character, the purpose of the designation being to identify/recognise areas with special and distinctive qualities which distinguish them from other areas of suburban housing in the borough rather than one which should be applied to large swathes of housing. Local Plan and NPPF policies seek to ensure a high standard of design across the borough which recognises the character of residential areas. A Character and Design SPD will provide supplementary guidance</p> <p>The whole of Cray Valley West Ward and of the area generally defined as St Paul's Cray and St Mary Cray will not be considered for the ASRC designation.</p>

**REPRESENTATIONS RECEIVED FOR FOCUSED CONSULTATIONS
FOLLOWING 2015 DRAFT ALLOCATIONS, FURTHER POLICIES AND
DESIGNATIONS**

LOCAL GREEN SPACE POLICY AND CRITERIA FOR DESIGNATION

Responses to the Local Plan Consultation on the Local Green Space Policy and Criteria 2016 – June 2016

Valued Environments – Local Green Space

Proposal at time of 2016 Consultation:

- Use the criteria for the Designation of Local Green Space to assess sites nominated for the Local Green Space designation as part of the Local Plan process subject to minor amendments to Criteria 1, 3, 6 and 8.
- Set out the criteria and provide guidance regarding the assessment of sites against the criteria in the Local Green Space Background Document.

16 respondents made comments, 14 sent comments by email, 2 in paper form (one having also been made by email) and 1 through the Council's Consultation Portal.

Comments made on the Local Green Space Draft Criteria for Designation

Respondent	Summary of Issues	Officer response to comments
Beckenham Society	General Support to the criteria Support, but the criteria should mention the Localism Act 2011.	Support Noted. Whilst the Localism Agenda certainly informed the Government's approach to Local Green Space, it is not the purpose of the criteria to set out background information to the designation.
Chislehurst Society, Friends of Chislehurst and Walden Recreation Ground, Trustees of Chislehurst Common	Support to the criteria, to the exception of Criterion 6.	Support Noted- <i>See below in the spreadsheet for comments on Criteria 6</i>
Petts Wood Residents and District Association	Support	Support Noted
Taylor Wimpey	Supports that sites should meet all 8 criteria to be designated as Local Green Space, and high bar approach.	Support Noted

<p>Greater London Authority (GLA)</p> <p>Taylor Wimpey</p>	<p>Comments on Criterion 1. <i>"The site is submitted by the local community".</i></p> <p>The term Local Community is hard to define. Amend Criterion to <i>" the site is submitted as part of the Local/Neighbourhood Plan process in line with paragraph 76 of the NPPF</i></p> <p>Support</p>	<p>Noted: Local Green Space is intended, as set out in the NPPF, to be <i>"demonstrably special to a local community, and hold "a particular local significance"</i>. The Council expects that the nominator (group or individual) should be able to demonstrate that the space is used or appreciated for particular reasons. Due to the relatively small scale nature of the spaces (i.e. "not extensive" as set out in the NPPF" the bulk of support is likely to be by local residents and people who work nearby.</p> <p>Guidance to be provided in the Local Green Space Background Document is to clarify can be meant by the "local community" in the context of Bromley as well as the type of information which could be provided to show support for a space to be designated as local green space, depending on the case that is being made for the designation.</p> <p>Whilst it is understood that Local Green Space can only be designated through the Local Plan and Neighbourhood Plan processes as reflected in the NPPF, this can be made explicit as part of the criteria for the benefit of local communities.</p> <p>Support Noted</p> <p>The criterion is reworded to read <i>"The site is designated as part of the local plan or neighbourhood planning process and is supported by the local community"</i></p>
<p>Taylor Wimpey</p>	<p>Comments on Criterion 2. <i>"There is no current planning permission which once implemented would undermine the merit of a proposed Local Green Space designation".</i></p> <p>Support</p>	<p>Support Noted</p>
<p>Friends of Bromley Parks and Gardens</p> <p>1 individual; Knoll House</p>	<p>Comments on Criterion 3. <i>"The proposed Local Green Space site is not land allocated for development as part of Bromley's Development Plan or required to meet the borough's development needs".</i></p> <p>Remove reference to "land required to meet the borough's development needs" as this does not comply with the NPPF. Land required to meet the borough's development needs should be identified in the Local Plan.</p> <p>Where there is a conflict between an emerging site allocation and the nomination of a site being proposed as Local Green Space, the site should be given a fair, impartial and independent assessment against any other draft emerging land use designation taking into account that a site's importance may outweigh recent</p>	<p>Officer response to comments: Part Agreed. The Local Plan has to achieve a balance between ensuring adequate land is available for a range of uses whilst protecting the local environment, character and quality of life.</p> <p>In order to account for a situation where a Local Green Space designation is compatible with a site allocation, and to clarify that the merit of a site being proposed for designation as Local Green</p>

<p>Residents Association</p> <p>Meads Road Residents Association</p> <p>Taylor Wimpey</p>	<p>council proposals which might be met elsewhere, or never be required.</p> <p>The Local Green Space designation should have been consulted on before land was earmarked for development in the Local Plan and downgraded from GB to UOS.</p> <p>Land should not be designated as LGS until the Local Plan has been examined and it has been confirmed that sufficient sites have been identified to meet housing need.</p>	<p>Space will be assessed against any other site allocations/designations where they are being formulated as part of the emerging Local Plan, Criterion 3 is amended as follows:</p> <p><i>The proposed Local Green Space site is not on land allocated for development in Bromley's Development Plan or it can be demonstrated that its designation would not prevent the allocation being delivered. Where development sites are still emerging, nominations for Local Green Space will be taken into account along with other site constraints and opportunities.</i></p>
<p>Individual</p> <p>Friends of Hollydale Open Space</p> <p>Taylor Wimpey</p>	<p>Comments on Criterion 4. <i>"The site proposed for designation is local in character and is not an extensive tract of land"</i></p> <p>The criterion is unclear. Planners should know how large a site should be in order to be suitable for designation as Local Green Space.</p> <p>A clearer and more definitive definition of what is meant by "<u>extensive</u>" is needed.</p> <p>It is unclear how a site could not be "local in character". If local in character as in typical of a local context, this conflicts to some extent with <u>criteria 6</u> which requires a site to be "unique and special".</p>	<p>Officer response to comments.</p> <p>This criterion directly reuses wording from the National Planning Policy Framework (NPPF) para. 77 which states that the designation should only be used "<i>where the green area concerned is local in character and is not an extensive tract of land</i>".</p> <p>The NPPF however defines neither "local in character" nor "extensive tract of land". National Planning Policy Guidance (NPPG) para 016 regarding Local Green Space confirm that there is no higher size threshold for LGS but does recognise that "<i>blanket designations of open countryside adjacent to settlements</i>" will not be appropriate, "<i>in particular</i>", that "<i>It should not be proposed as a "back door" way to try and achieve what would amount to a new area of Greenbelt by another name</i>".</p> <p>Criterion 4 recognises the NPPF direction and associated guidance and in particular the statement (NPPG para 017), that "<i>a degree of judgment will inevitably be needed</i>" to determine how big a LGS could be.</p> <p>The Guidance provided for this criterion in the evidence base document will help clarify what will be taken into consideration when judging whether a site is "an extensive tract of land" or "local in character".</p> <p>Sites could be not "local in character" where they are "extensive tracts of land" and in other circumstances such as where they do not perform a local function or their special qualities cannot be enjoyed by the local community. It is not considered that the requirement that a site should be "local in character" would conflict with that for a site to be "unique and special" as the intent (with regards to criteria 6), was for a site to have demonstrably <i>locally</i> unique and special qualities.</p>

		The Guidance to be provided in the Local Green Space Background Document is to clarify what elements will be considered when judging when assessing whether a site is “not an extensive tract of land” and is “local in character”.
Greater London Authority (GLA)	<p>Comments on Criterion 5: <i>Where the proposed site is publicly accessible, it is within walking distance of the community, or where the proposed site is not publicly accessible, it is within reasonable distance of the local community.</i></p> <p>The terms "reasonable distance" and "walking distance" are hard to define. Refer to agreed figure such as one set out in LP Table 7.2.</p> <p>A site not being publicly accessible reduces any unique and special qualities of a site.</p>	<p>This criterion is based on the NPPF para. 77 and the NPPG para 015.on Local Green Space. The wording of the criteria recognises that proximity will be assessed depending on the circumstances of a particular site and on the case for nomination.</p> <p>The guidance to be provided in the Local Green Space Background Document will help clarify what will be taken into consideration whether a site is within “walking distance” or “reasonable distance” of a local community.</p> <p>Partly agreed. It is likely that the special characteristics of a site may only be enjoyed by the local community where there is public access to the site however this may not always be the case depending on the case made for designation.</p>
<p>1 Individual;</p> <p>Bromley Biodiversity Partnership</p> <p>Bull Lane Allotments Action Group</p> <p>Chislehurst Society</p> <p>Friends of Bromley Parks and Gardens</p> <p>Friends of Hollydale Open Space</p> <p>Meads Road Residents</p>	<p>Comments on Criterion 6. <i>“The space being proposed for designation is demonstrably special to a local community and holds a particular local significance because of “unique and special qualities” relating to, for example, its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife”.</i></p> <p>Summary of Comments:</p> <p>Concerns about the requirement for a site to have “unique” as well as “special” qualities to be eligible for the Local Green Space status- The word “unique” should be removed from the wording of the criterion.</p> <p>It is unclear what the word “unique” refers to: are the qualities of a site required to be locally, nationally, or even internationally unique?</p> <p>All sites could be refused the planning designation on the grounds that they are not “unique”.</p> <p>The Word unique is not referenced in the National Planning Policy Framework which requires that the LGS designation should only be used where “an area is demonstrably special to a local community and holds particular significance, for example because of its beauty, historic significance, recreational value”. The wording used is therefore contrary to the NPPF and sets an undue burden of proof</p>	<p>Agreed. The word “unique” was originally included in the criteria for consultation to account for the fact that a site’s qualities, in order for the site to be “demonstrably special” to a local community and hold “<u>particular</u> significance” as required in the NPPF para.77, should be quite locally distinctive.</p> <p>It is acknowledged that although individual sites will be unique locally, their special qualities may or may not when considering them at a more than local scale. For the avoidance of doubt the criterion wording will be amended by removing the word “unique from the criteria”.</p>

<p>Association</p> <p>Orpington Field Club</p> <p>Trustees of Chislehurst Common</p> <p>Bull Lane Allotments Action Group</p> <p>Meads Road Residents Association:</p> <p>Taylor Wimpey</p>	<p>on local community groups applying for the Local Green Space designation, making it impossible to obtain. It should be enough for applicants to details what are the site's "special qualities".</p> <p>The criterion requires the local community to demonstrate that sites meet each of the categories listed in section 77 of the National Planning Policy Framework (NPPF i.e. beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife,) but a site can be special because of characteristics falling under each of these categories, and the aggregate or cumulative weighting of the total evidence provided should be considered when making a decision on whether to grant the designation or not.</p> <p>The criterion does not set benchmarks in assessing a site's important qualities given only as examples.</p> <p>Published evidence needs to be provided in support of a site having "unique and special" qualities.</p>	<p>The criteria as worded do not require demonstrating that sites should meet each of the categories listed in S.77 of the NPPF but recognises that these are particular examples of what could make a site special, and of its significance. It is recognised that a site could indeed be special and significant for of a number of reasons.</p> <p>Noted. Whilst the criterion does not set benchmarks to assess its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife, the supporting guidance to this criterion included in the evidence base document will provide examples of what could be considered to determine whether a site is special having regards to this categories, whilst recognising that a site could be special and significant for a number of reasons.</p> <p>Partly Agree. The criteria for the designation of Local Green Space in the Local Plan is to be supplemented by guidance in the Local Green Space Background Document clarifying the type of evidence, published or not published, that local communities could provide to demonstrate that their site is "demonstrably special" and the type of evidence that the Council will consider.</p> <p>Criterion 6 is being amended as follows: <i>"The space being proposed for designation is demonstrably special to a local community and holds a particular local significance because of "special qualities" relating to, for example, its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife".</i></p>
<p>Friends of Bromley Parks and Gardens (FBPG)</p>	<p>Comments on Criterion 7. <i>The Local Green Space designation would provide protection additional to any existing protective policies and its special characteristics could not be protected through any other reasonable and more adequate means.</i></p> <p>Different types of designations are meant to achieve different purposes. Consider making reference to the additional local benefits rather than the additional levels of protection which could be brought through the LGS designation, as per NPPF Guidance on CAs (para. 12), taking into account guidance set out in Para.11 of National Planning Policy Guidance on Local Green Space.</p> <p>Para 11 of National Planning Policy Guidance on LGS states that "If land is</p>	<p>Noted. The LGS designation's intended purpose is to provide additional material protection to the characteristics for which a site is held to be special, which may not be protected to the same standard by other designations. Depending on the case made for designation of a site as Local Green Space, the designation could provide additional protection to sites designated as Greenbelt or Metropolitan Open Land.</p>

Taylor Wimpey	<p>already protected by Green Belt policy or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as LGS. One potential benefit in areas where protection from development is norm (e.g. villages included in green belt) but where there could be exceptions is that LGS designation could help to identify areas that are of particular importance to the local community.”</p> <p>Support</p>	Support Noted
<p>Bull Lane Action Group</p> <p>Friends of Hollydale Open Space</p> <p>GLA</p> <p>Taylor Wimpey</p>	<p>Comments on Criterion 8. <i>“The site’s special characteristics and any uses or activities which form part of the case for its designation can be maintained and managed during the Local Plan period”.</i></p> <p>Criterion is biased towards landowners. Equal weight needs to be given to the landowner's interest and to the planning process in providing a site with an additional layer of protection.</p> <p>Possible conflict of interest between the Council's plans re: a space proposed for designations and the intentions of a local interest group to use or maintain the site over the plan period as part of the case for designation.</p> <p>Wording "during the local plan period" is not consistent with NPPF para.76 which requires a site to endure as LGS beyond the plan period.</p> <p>Support</p>	<p>Officer response to comments by BLAG and FHOS : Disagree: This criterion is in accordance with the NPPF approach. This means that the “special qualities” which make the case for the designation as well as the activities and uses which are sustained by these qualities should be able to endure during that time.</p> <p>The criterion reflects that the Local Plan and the Local Green Space cannot control sale of land or changes of use which are otherwise permissible. As the LGS designation should be able to endure beyond the plan period, it is essential that the intentions of the landowner are taken into account.</p> <p>Response to the GLA Agreed. Reference to NPPF wording is accurate. Not anticipated however that local communities will be able to supply evidence of a site being able to be maintained for life or beyond life of plan so an element of judgment about likelihood of it happening in view of evidence supplied is inevitable. Further guidance to be provided in Local Green Space Background Document.</p> <p>Response : Support Noted</p> <p>Criterion 8 amended: <i>“The site’s special characteristics and any uses or activities which form part of the case for its designation can be maintained and managed <u>beyond</u> the Local Plan period.”</i></p>

Comments made on the LGS Policy

Proposal at time of 2016 consultation:

- Carry the Draft Local Green Space policy forward as part of the Local Plan, subject to minor changes.
- Signpost Sport England's Active Design guidance under adequate policies in the Local Plan.

13 respondents made comments, 10 sent comments by email, and 3 via the Council's Consultation Portal.

Respondent	Summary of Issues	Officer response to comments
Beckenham Society on behalf of the Town Centre Team	The Localism Act should be prominent when formulating policies about Local Green Space. Avoid confusion between the generic term "local green space" and the "Local Green Space" designation in the local plan.	Noted. Where "Local Green Space" is a planning designation, it will be referred to in writing with capital letters in planning documents, as per other designations. It is understood that the Localism approach, rather than the Localism Act itself, informed the introduction of the Local Green Space designation in the NPPF. The role of the Localism Act however is recognised by the references to neighbourhood planning in the supporting text to the policy.
Bromley Biodiversity Partnership	Support	Support Noted.
Environment Agency	Support	Support Noted.
Sports England	<p>Sport England welcomes the inclusion of this policy. Sport England recommends that this policy includes the need for indoor and outdoor sports facilities. This section should therefore be revised to reflect Objective 3 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' (http://www.sportengland.org/media/162412/planning-for-sport_aims-objectives-june-2013.pdf), which is in line with the NPPF. The statement details Sport England's three objectives in its involvement in planning matters;</p> <ol style="list-style-type: none"> 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport. 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable. 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation. <p>Furthermore, this section should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy (http://www.sportengland.org/facilities-planning/planning-for-</p>	<p>Support Noted. Bromley's Draft Local Plan includes policies supporting Sport England's Planning Policy Statement. The Local Green Space policy proposed for inclusion in the Draft Local Plan ensures that the designation protects the special qualities of a site. Use as a playing field may form part of the case for the designation of a particular site, and the characteristics which sustain that use would be afforded additional protection through the Local Green Space designation. The Draft policy is thus compliant with para 74 of the NPPF and particularly objective 1 of Sports England statement.</p> <p>The Local Green Space policy is a policy aimed at protecting the special characteristics of sites which qualify them for the designation whatever they may be, rather than inform the desirable or acceptable qualities of development which may occur on these sites under the provisions of other planning designations. The policy is not specifically aimed at supporting recreational facilities and the Active Design guidance is not signposted in this particular policy, but separately elsewhere in the draft Local Plan.</p>

	<p>sport/development-management/planning-applications/playing-field-land/).</p> <p>Sport England would recommend that Sport England's Active Design Guidance http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/ is referenced within this section.</p>	
Chislehurst Society	Support to the principle of the Local Green Space policy.	Support Noted.
<p>1 Individual; Bromley Biodiversity Partnership Bull Lane Allotments Action Group Chislehurst Society Friends of Bromley Parks and Gardens Friends of Hollydale Open Space Meads Road Residents Association Orpington Field Club Trustees of Chislehurst Common</p>	<p>The following comments, made in relation to the LGS criteria, have implications for the wording of the LGS policy:</p> <p>Summary of Comments: Concerns about the requirement for a site to have “unique” as well as “special” qualities to be eligible for the Local Green Space status</p> <p>It is unclear what the word “unique” refers to: are the qualities of a site required to be locally, nationally, or even internationally unique?</p> <p>All sites could be refused the planning designation on the grounds that they are not “unique”.</p> <p>The Word unique is not referenced in the National Planning Policy Framework which requires that the LGS designation should only be used where “an area is demonstrably special to a local community and holds particular significance, for example because of its beauty, historic significance, recreational value”. The wording used is therefore contrary to the NPPF and sets an undue burden of proof on local community groups applying for the Local Green Space designation, making it impossible to obtain. It should be enough for applicants to detail what are the site’s “special qualities”.</p>	<p>Agree. The reference to the “unique and special qualities” of sites is proposed to be removed from the Revised Local Green Space policy for inclusion in the Local Plan.</p> <p>The word “unique” was originally included in the policy for consultation to account for the fact that a site’s qualities, in order for the site to be “<u>demonstrably</u> special” to a local community and hold “<u>particular</u> significance” as required in the NPPF para.77, should be quite locally <i>distinctive</i>.</p> <p>It is acknowledged that although individual sites will be unique, their special qualities may or may not when considered at a more than local scale.</p> <p>For the avoidance of doubt the reference to the qualities of sites being “<i>unique</i>” will be removed from the policy’s supporting text.</p>
1 Individual	The definition used in the policy for Local Green Space does not make it clear how small these spaces could be and should include relatively small spaces, either as a group or as individual spaces in a particular area.	Noted. Neither the NPPF nor the NPPG on Local Green Space set out a minimum size threshold for LGS, however the site’s size should enable it to sustain the “special qualities” described in the site’s Statement of Significance. Guidance provided in the Local Green Space Background document to be provided to clarify what the Council will consider when assessing whether a site has got demonstrably special qualities.