

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

Suggested Modification	Reason	Representor/Origin of Proposed Change
Section 1.2 – About the Local Plan		
Para 1.2.27: <i>‘...through the NPPF, London Plan and the emerging Local Plan is balancing <u>and seeking positive gains</u> for the economic, social and environmental well-being of the Borough’.</i>	To ensure a positive approach to economic, social and environmental gains. This modification better reflects the tenet of sustainable development.	193_1 Katharine Fletcher, Historic England
Section 1.3 – Vision and Objectives		
Title: <i>‘<u>Historic environment Built Heritage</u>’</i> Para 1.3.14: <i>‘Our man-made heritage assets; areas of distinctive character, <u>historic parks and gardens, listed buildings, conservation areas and scheduled monuments and undesignated archaeology are protected and enhanced</u>’</i>	To ensure below ground archaeology and Registered Historic Parks & Gardens are acknowledged.	193_1 Katharine Fletcher, Historic England
Draft Policy 1 - Housing Supply		
<i>‘c - The development of housing within Renewal Areas where appropriate’</i>	Other clauses are not caveated and it is considered that the wording ‘where appropriate’ does not strengthen the policy.	53_1 Steve Dennington, London Borough of Croydon
Insert at the end of para 2.1.5: <i>“The housing trajectory in Appendix 10.1 shows a total of 10,645 deliverable and developable dwellings over the Plan period, an annual average of over 700 dwellings.”</i>	To demonstrate within the housing policy that the housing trajectory is in accordance with Policy 3.3 of the 2016 London Plan. This requires the borough to deliver a minimum of 641 dwellings per annum whilst asking boroughs (in clauses Da and E) to close the gap between identified housing need and supply in line with the NPPF.	125_1 Greater London Authority
Housing mixed use Site 4 - Gas holder site, Homesdale Road		
<i>“Ensure complete <u>appropriate</u> remediation of contaminated land on the site is completed”</i>	To reflect that ‘appropriate’ remediation is the standard required.	63_1 Jonathan Best, Montagu Evans for Travis Perkins
Draft Policy 2 – Affordable Housing		
After para 2.1.30: <i>“<u>Where public subsidy towards affordable housing is used, this should result in an increase in the provision of affordable housing on site reflecting the Mayor’s Draft Affordable Housing and Viability SPG.</u>”</i>	To provide clarity and to reflect the GLA’s approach of a threshold for affordable housing viability without public subsidy.	125_2 Greater London Authority

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

After para 2.1.35: <i>“Intermediate housing income thresholds will be updated every three years.”</i>	To clarify that borough intermediate income levels will be updated on a regular basis.	168_5 Dr Elanor Warwick, Clarion Housing Group
Draft Policy 4 – Housing Design		
Para 2.1.59: <i>“designed to be wheelchair accessible [M4(3)(2b)] for dwellings where the end user is ‘known’ affordable provision where the local authority is allocating or nominating the residents...”</i>	Amendment for clarity.	125_3 Greater London Authority
Clause (f): <i>“...whilst respecting local character, including heritage”</i>	To avoid ambiguity and align the policy with paras 59-61 of the NPPF.	193_2 Katharine Fletcher, Historic England
Policy 8 – Side Space		
Para 2.1.66: <i>“The Council considers that the retention of space around residential buildings at first floor and above is essential...”</i>	To clarify that the policy only applies to two storey extensions.	Officer suggestion
Draft Policy 11 – Specialist and older people’s accommodation		
(BEFORE 2.1.80) <u>“2.1.80A:</u> <i>The Council wishes to encourage the provision of a high quality living environment for those living in Specialist accommodation, which includes supported housing to meet the different accommodation needs of people with learning disabilities, mental health problems, as well as specialist housing for older people”</i> <i>“2.1.80 Models of accommodation designed for older people continue to evolve. Over the last decade there has been reduced reliance on residential care homes and a shift towards enabling people to retain their independence, remaining living in the community with appropriate support or in Extra Care Housing (ECH) which provides improved opportunities for people who are no longer able to live in their own home, even with support, including older physically frail people,</i>	To clarify that specialist housing caters for a range of residents.	67_1 Nick Taylor Carter Jonas for Beckenham Trustees

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>and thereby reducing the demand for residential care. However, there remains a potential growth in demand for both nursing and residential care for “Elderly Mentally Infirm” (EMI) people.”</i></p>		
<p>Section 2.3 - Renewal Areas</p>		
<p>Para. 2.3.35: <i>‘The Lewisham Core Strategy 2011 indicates that identified a number of areas as Local Regeneration Areas. These areas were identified as falling within the top 20% LSOAS nationally and include Downham. Given these areas have the greatest socio-economic needs, the Lewisham Core Strategy states that with their partners Lewisham will seek to strengthen the quality of life and well-being by addressing deprivation and health inequalities, highlighting a number of wards including Downham.</i></p>	<p>To accurately reflect Lewisham’s Core Strategy.</p>	<p>34_3 Emma Talbot, London Borough of Lewisham</p>
<p>Para 2.3.3: <i>“English Indices of deprivation Deprivation”</i> <i>‘Ravensbourne, Plaistow & Sundridge’</i></p>	<p>Capitalisation to reflect title. Apostrophes around the names to identify as a single ‘Place’.</p>	<p>160_2 Chris Burton</p>
<p>Amend map for Black and White reproduction</p> <p>Para 2.3.7: <i>“Note: The hatched area of blue to the east of the Borough, illustrates includes a single geographically large electoral district falling within the 20% most deprived LSOA’s. This LSOA electoral district includes a significant area of sparsely populated Green Belt —a ‘Place’ referred to in the Characterisation Document as “Eastern Green Belt”, which has not been included within “The Cray Valley Renewal Area”.</i></p>	<p>For clarity and ease of understanding.</p>	<p>116_1 John Escott, Robinson Escott Planning</p>
<p>Draft Policy 13 – Renewal Areas</p>		
<p>Para 2.3.12: <i>“The various Renewal Areas have a range of assets, physical (<u>including heritage</u>) social and economic, ...”</i></p>	<p>To highlight that heritage assets are included within the range of physical assets which paragraph 2.3.12 indicates offer potential for Renewal Areas enhancement.</p>	<p>193_3 Katharine Fletcher, Historic England</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

Draft Policy 15 – Crystal Palace, Penge and Anerley Renewal Area		
<p>A new paragraph located before para 2.3.17 in Draft Policy 15's supporting text: <u>2.3.16b: "The Crystal Palace, Penge & Anerley Renewal Area extends from the northwest of the Borough, where it adjoins four other boroughs Croydon, Lambeth, Southwark and Lewisham, and meets the Crystal Palace District Centre, downhill to Penge and Anerley. It includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Betts Park and Maple Road / Franklin Road."</u></p> <p>Para 2.3.19: "The Crystal Palace, Penge & Anerley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Betts Park and Maple Road / Franklin Road. The identification of Crystal Palace as a Strategic Outer London Development Centre (SOLDC) with..."</p>	<p>To assist with the understanding of the Renewal Area and Crystal Palace District Centre relationship with adjoining boroughs.</p> <p>To improve clarity of Renewal Area description and readability.</p>	<p>111_1 Francis Bernstein</p>
<p>Para 2.3.18: "Crystal Palace Park is a Grade II* listed park designated as Metropolitan Open Land which was once home to Sir Joseph Paxton's Crystal Palace, the structure which originally which, in its original form, housed the Great Exhibition of 1851 in Hyde Park".</p>	<p>Minor amendment for clarity.</p>	<p>119_2 Ken Lewington, The Crystal Palace Foundation</p>
Draft Policy 17 – Cray Valley renewal area		
<p>New para 2.3.26b: <u>"The River Cray runs through open spaces, including recreation grounds, SSSI and SINCDesignations, as well as residential, commercial and industrial areas and two conservation areas. Development may present opportunities for the restoration of the river and providing improved ecological habitats to buffer the watercourse,"</u></p>	<p>An additional paragraph of supporting text is considered appropriate to support clause b) and highlight the Council's statutory function in protecting and delivering the Water Framework Directive (WFD) objectives contained in the Thames River Basin management plan.</p>	<p>51_1 Charles Murithi, Environment Agency (also 51_2 - Draft Policy 68)</p>
<p>Para 2.3.29:</p>	<p>Amendment required for clarity/ease of reference.</p>	<p>57_1</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>“...These developments are reinforcing Orpington’s importance in respect of cultural, social and recreational facilities and its role as a Major Town Centre which is recognised, and reinforced and controlled through in Policies 91 ‘Proposals for Main Town Centre Uses’ and 92 ‘Metropolitan and Major Town Centres’”</i></p>		<p>Ben Read, Rapleys for Associated British Foods</p>
<p>Draft Policy 19 – Ravensbourne, Plaistow and Sundridge Renewal Area</p>		
<p>Within the policy: <i>‘Ravensbourne, Plaistow & Sundridge’</i></p>	<p>Apostrophes around the names to identity as a single ‘Place’.</p>	<p>160_2 Chris Burton</p>
<p>Draft Policy 20 – Community Facilities</p>		
<p>Within the 3rd para. of the policy: <i>“... a change of use not permitted under the <u>GDPO GPDO Use Classes Order...</u>”</i></p>	<p>Correction.</p>	<p>Officer suggestion</p>
<p>Draft Policy 26 – Health & Wellbeing</p>		
<p>“3.2.9 <i>The benefits <u>to health of the multifunctional network of green spaces, and the exercise they facilitate including, in relation to mental health, are well documented (e.g. MIND “Ecotherapy”). This health value is recognised and protection afforded to open spaces through policies in the Valued Environments chapter. whilst Certain proposals may present health concerns, for example, relating to air or light pollution...</u></i>”</p>	<p>To make reference to the objectives of the All London Green Grid.</p>	<p>59_17 Matthew Frith, London Wildlife Trust</p>
<p>End of para 3.2.10: <i>“<u>Sport England’s Active Design Guidance highlights opportunities to encourage and promote sport and physical activity through the design and layout of the built environment.</u>”</i></p>	<p>To make reference to Active Design Guidance.</p>	<p>58_2 Dale Greetham, Sport England (Draft Policy 4)</p>
<p>Draft Policy 28 – Education Facilities</p>		
<p>Para 3.3.16: <i>“...it is important that opportunities to address the pressure for education provision are not refused on grounds where there are potential solutions to mitigate adverse impacts of the development, through planning conditions or obligations. <u>Such mitigation may involve travel plans, highway measures and the consideration of “Healthy</u></i></p>	<p>To ensure reference is made to the mitigation of existing transport modes; the development of Healthy Routes to schools and to the accessibility of the site by other means than the car (i.e. school parking and drop off being restricted).</p>	<p>39_5 Andrew Dorrian, Transport for London</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>Routes</i> . (e.g. travel plans, highways measures, staggered school hours, landscaping).’		
Para 3.3.54: “...or sites within the <u>locality</u> (see also draft Policy 20 Community Facilities).”	For improved clarity of the plan & helps with concerns regarding the reprovision of existing community facilities.	80_3 Labour Group
Para 3.3.40: “... Details of the individual schools <u>identified in the Primary School Development Plan (2015)</u> and Local Plan proposals are set out in Tables 4 and 5.”	Clarification of why Farnborough Primary School is included in Table 13.	191_1 Sue Ellis, Farnborough Village Society
Education Site 32 - Turpington Lane		
Appendix 10.4 - Site 32 Turpington Lane, Bromley Common: “ <i>Note allotments to the north of the site, outside the area allocated for education to be designated as Local Green Space (Appendix 10.8 site no 23 65)</i> ” See also minor modification proposed to Policies Map Set Part 2 Site 27	Correction of cross reference.	45_1 Mary Dawe, Bromley Common Allotment Gardens Association
Policy 30 – Parking		
New column in Table 1 relating to 4+ bedroom standards: “PTAL <u>4+ bed</u> 0-2* <u>Minimum of 2</u> 2*-6a <u>1.5 (min) – 2 (max)</u> ”	Correction, as column was omitted in error.	39_1 Andrew Dorrian, Transport for London
Policy 31 – Relieving Congestion		
New para. after 4.0.7: “ <u>All Transport Assessments, Travel Plans, Construction Logistics and Delivery and Servicing Plans should be developed in line with TfL guidance.</u> ”	Amendment to reference TfL guidance.	39_2 Andrew Dorrian, Transport for London
Section 5 – Valued Environments		
Para 5.0.1: “ <u>This Chapter sets out the draft policies which protect and enhance the natural, built and historic environment</u> ”.	Amendment to reflect the terms used in national guidance so that it is clearly inclusive of the historic environment, and particularly archaeology.	193_6 Katharine Fletcher, Historic England
Para 5.0.4: “ <u>London Plan Policy 2.18 ‘Green Infrastructure:</u>	To make reference to the objectives of the All London Green Grid.	59_17 Matthew Frith, London Wildlife Trust

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>The Multifunctional Network of Green and Open Spaces' and supplementary planning guidance on the All London Green Grid, recognises green infrastructure as an asset, to be valued for the whole range of social, health, environmental, economic and educational benefits it brings to London."</i>		(Draft Policy 26)
Draft Policy 37 – General Design of Development		
New para. at 5.0.8: <i>"New developments and the spaces about buildings are also expected to take account of and enhance biodiversity. The Council will and developers should have regards to the relevant British Standards related to biodiversity to ensure that planning proposals are informed by sufficient and appropriate ecological information."</i>	To ensure reference is made to the British Standard 'BS 42020:2013 Biodiversity. Code of practice for planning and development' as a resource that applicants need to consider to ensure that development design avoids/limits adverse impacts, whilst contributing to securing gains for biodiversity.	59_30 Matthew Frith, London Wildlife Trust
Section 5.1 – Built Heritage		
Retitle the Section " <i>Built and Historic Environment</i> "	To make reference to the "Historic Environment" in the title of Section 5.1 as built heritage could be interpreted as excluding historic parks, gardens and archaeology.	193_8 Katharine Fletcher, Historic England
Draft Policy 38 – Statutory Listed Buildings		
Supporting text of para 5.1.3: <i>"Under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework 1990, the Council is required to have special regard to the desirability of preserving listed buildings and their settings and 'conserving their significance', i.e. the sum of its cultural, natural and heritage values."</i>	To make reference to ' <i>conserving the significance</i> ' of listed buildings, to closely align with the NPPF terminology.	193_9 Katharine Fletcher, Historic England
Draft Policy 39 - Locally Listed Buildings		
End of para 5.1.4, line 4: <i>"Where the replacement of a locally listed building is accepted, the proposed building should be of a high architectural standard."</i>	To clarify that the replacement of a listed building should be of a high architectural standard.	Officer suggestion
Draft Policy 41 - Conservation Areas		
Para 5.1.6, line 5: <i>"Conservation Area Policy Statements guidance"</i>	To update reference to relevant guidance.	Officer suggestion

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

The Council's Conservation Areas will be listed in an Appendix to the Local Plan.	For consistency with the listing of ASRCs in Draft Policy 44.	173_3 Ms Pam Notcutt, The Beckenham Society
Line 1 of the Conservation Area policy: "A Conservation Area Areas is an area designated because it has a <u>are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, therefore a proposal Proposals for [etc....]."</u>	To improve consistency with the definition of Conservation Areas in national policy, relevant legislation, case law & the NPPF and to clarify the distinction between Conservation Areas & Areas of Special Residential Character.	176_3 Ray Foster
After line 6 in the supporting text: <u>"In assessing the contribution made by a particular building to a conservation area, reference will be made to the current relevant Historic England guidance"</u> .	The re-instatement of a sentence from UDP Policy BE12 within Draft Policy 41 makes clear the criteria upon which a judgement of positive contribution can or should be made.	181_9 Mr Peter Martin, Bromley Civic Society
Para 5.1.6: <u>"Detailed Guidelines for each Conservation Area and a description of the significance which it is desirable to conserve are contained in Conservation Area Guidance [...]."</u>	To make reference to 'conserving 'the significance' of conservation areas in line with the terminology used in the NPPF.	193_10 Katharine Fletcher, Historic England
Draft Policy 43 - Trees in Conservation Areas		
Para. 5.1.8: "...that consent. In addition, trees over 7.5cm in diameter measured at 1.5m from ground level in Conservation Areas are protected. Native species and local provenance will be sought as appropriate. Trees over 7.5 cm in diameter measured at 1.5m from ground level in Conservation Areas are protected under the Town and Country Planning Act 1990 even where they are not covered by TPOs."	To address concern that there is no specific provision for safeguarding trees in conservation areas.	71_10 Tony Allen, The Chislehurst Society
Para 5.1.8: <u>"When consent is given for a tree to be felled, an appropriate replacement will usually be required as a condition of that consent. Native species and local provenance will be sought as appropriate"</u> .	To clarify what species should be planted on development sites.	98_1 Ishpi Blatchley (Section 5.3)
Draft Policy 44 – Areas of Special Residential Character		
Para 5.1.10: <u>"The Appendix includes guidelines for the management of development in ASRCs. ASRCs</u>	To make reference to the evidence base documents that clarify how each designation was defined.	193_11 Historic England

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>are shown in the policies map. <u>Background to the designation of ASRCs is set out in the “Local Plan Background Paper on Potential Areas of Special Residential Character (2015)”, whilst additional assessments are set out in the 2016 Local Plan Background Paper “North Copers Cope Road and the Knoll ASRCs Spatial Character Assessments”.</u></i></p>		
<p>Draft Policy 45 – Historic Parks and Gardens</p>		
<p>Para 5.1.12: <i>“Register of Parks and Gardens of Special <u>Historical Historic Interest</u>”</i></p>	<p>Correction.</p>	<p>119_3 Ken Lewington, The Crystal Palace Foundation</p>
<p>Para 5.1.14: <i>“[...] the Council will consult <u>Historic England. Proposals impacting the significance of a Registered Park or Garden will also be assessed against the tests laid out in para. 132-134 of the National Planning Policy Framework so that the park’s significance is appropriately conserved.</u>”</i></p>	<p>For clarity & consistency with other policies on registered Heritage Assets in the Valued Environments Chapter and in addition, to make reference to the relevant tests in the NPPF against which any proposal would be assessed.</p>	<p>189_1 Sally Collins</p>
<p>End of para 5.1.14: <i>“<u>The Significance of each Registered Parks or Garden is set out and described as part of their respective entries on Historic England’s web-based National Heritage List</u>”</i></p> <p>The Historic Parks and Gardens sites will be identified on the Policies Maps as they are referred to in the policy.</p>	<p>Information is added to para 5.1.14 as to where entries from the national Register can be accessed to assist with the application of the policy.</p> <p>To ensure the effectiveness of this plan policy.</p>	<p>193_12 Katharine Fletcher, Historic England</p>
<p>Draft Policy 46 - Ancient Monuments and Archaeology</p>		
<p>Title: <i>‘Ancient <u>Scheduled Monuments and Archaeology</u>’</i></p> <p>End of para 5.1.16: <i>“<u>Bromley’s Areas of Archaeological Significance are due to be reviewed by Historic England and Supplementary Planning Guidance will be published identifying any proposed changes</u>”. ‘Further advice can be provided by the Greater London Archaeological</i></p>	<p>A change to the title, as “scheduled” monuments are the ones which are protected by statutory designation.</p> <p>Further changes requested for clarity purposes.</p>	<p>193_13 Katharine Fletcher, Historic England</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<u>Advisory Service (GLAAS) within Historic England.</u>		
Draft Policy 47 – Tall and large buildings		
Para 5.1.20: “ <u>High Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline</u> ”.	For consistency with HE guidance & Policy 7.8 of the London Plan.	125_5 Jennifer Peters, Greater London Authority
Draft Policy 48 - Skyline		
Para 5.1.21: “ <u>Views will need to be considered to ensure intrusive elements are not introduced whether in the foreground, middle ground or background through the appropriate assessment.</u> ”	To improve clarity as to how impacts of buildings on views should be demonstrated.	61_6 Kieran Wheeler, Savills for Bellway Homes
Draft Policy 56 – Local Green Space		
Para 5.2.33: “ <u>Hoblingwell Wood and Recreation Ground, Leasons Way Hill, St Paul’s Cray</u> ”	Correction.	Email dated November 26 2016 John Ince, Friends of Hoblingwell
Para 5.2.33: <ul style="list-style-type: none"> • <u>Bull Lane Allotments, Chislehurst</u> • <u>Cator Park, Aldersmead Road, New Beckenham.</u> • <u>Downe Orchard, between Rookery Road and North End Lane, Downe</u> • <u>Royston Field, Franklin Road, Penge</u> 	Four sites had been omitted from the supporting text of the Local Green Space policy in error. This was acknowledged in the Errata dated 18.11.2016 to the Proposed Draft Submission Local Plan.	Email dated 17_11_2016 Alex Ross
Section 5.3 - Nature Conservation and Development		
Line 2 of para. 2: “ This Policy <u>These policies aims to protect those sites and features which are of ecological interest and value [...]</u> ”	To clarify that the first three introductory paras of the section do not form part of Draft Policy 68 <u>Development and SSSIs</u> .	Officer suggestion
Renumber the supporting text of the section	Some supporting paras. have not been assigned a number (under S5.3, Pol 68, 69, 70 & 71)	Officer suggestion
Introduction, para 5.3.1 (as renumbered): “ <u>Local authorities are required by The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) to have regard to the desirability of conserving the natural beauty and amenity of the countryside, and a duty to have regard for biodiversity commensurate with</u> ”	To highlight and reference the Council’s duty to have regard to biodiversity.	59_55 Matthew Frith, London Wildlife Trust

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>their functions under the Natural Environment and Rural Communities Act (NERC) 2006”.</i>		
Introduction, para 5.3.2 (as renumbered): “... <i>Wherever possible, the sympathetic management of such habitats will be encouraged through planning conditions, obligations or voluntary agreements. The Bromley Biodiversity Plan (2015) translates the Borough’s biodiversity duty as set out in the NERC and carried over to national and regional biodiversity strategies to the context of Bromley. The Strategy promotes the conservation enhancement and protection of biodiverse spaces and identifies the protected and priority species and habitats of notes in Bromley.</i> ”	To explain the role of Bromley’s Biodiversity Plan in relation to the Council’s Biodiversity Duty and to highlight that the Biodiversity Plan lists species & habitats of the borough which it is desirable to preserve & enhance, including ancient trees.	184_1 Dr Judith John, Orpington Field Club
Draft Policy 70 – Wildlife features		
End of 2nd bullet point in the policy: “... <i>to contribute towards the Bromley Biodiversity Action Plan.</i> ”	To strengthen the policy by referencing the borough’s nature conservation objectives.	59_45 Matthew Frith, London Wildlife Trust
Para 5.3.4 (as correctly renumbered): “ <i>Planning proposals should be informed by the relevant British Standard(s) regarding Biodiversity as part of this process.</i> ”	To ensure reference is made to the British Standard ‘BS 42020:2013 Biodiversity. Code of practice for planning and development’ as a resource that applicants need to consider to ensure that development design avoids/limits adverse impacts, whilst contributing to securing gains for biodiversity.	59_30 Matthew Frith, London Wildlife Trust (Draft Policy 37)
Draft Policy 72 – Protected Species		
5.3.1: “[...]. <i>The UK Biodiversity Plan (1994) identifies priority species as a valuable ecological resource to be conserved. These are listed under Section 41 of the Natural Environment & Rural Communities Act 2006. These schedules are updated on a regular basis and local authorities are kept informed of any changes. In addition, the Biodiversity Plan identifies the Priority Species for Bromley including plant, fungi, bird and butterfly species of rare or threatened status. These should be taken into special consideration when</i>	To make reference to the UK BAP & Bromley Priority species, which are listed under Section 41 of the Natural Environment & Rural Communities Act 2006 and referenced in the Bromley Biodiversity Plan.	59_47 Matthew Frith, London Wildlife Trust

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>development or change of use occurs and mitigation measures secured as above. In addition, the Bromley Biodiversity Plan approved in 2015 sets out protected species in the Borough.</i>		
Draft Policy 73 – Development and Trees		
<p>Para 5.3.2: <i>“...by TPOs. In addition, trees over 7.5 cm in diameter measured at 1.5m from ground level in Conservation Areas are protected even where they are not covered by a TPO. Policy 43 sets out how the Council will assess applications for the felling of trees in Conservation Areas.”</i></p> <p>Para 5.3.3: <i>“...reach maturity. Where new trees are planted native species and local provenance will be sought as appropriate.”</i></p>	To address concern that there is no specific provision for safeguarding trees in conservation areas.	71_10 Tony Allen, The Chislehurst Society (Draft Policy 43)
<p>Last line of Draft Policy 73: <i>“When trees have to be felled, the Council will seek suitable replanting of native species”.</i></p>	To clarify what species should be planted on development sites.	98_1 Ishpi Blatchley (Section 5.3)
Draft Policy 74 – Conservation and Management of Trees and Woodlands		
<p>Para 5.3.6: <i>“The Council will make use of planning conditions and obligations to achieve new planting of suitable tree species, native and/or of local provenance as appropriate, through the planning process.”</i></p>	To clarify what species should be planted on development sites.	98_1 Ishpi Blatchley (Section 5.3)
Draft Policy 75 – Hedgerows and Development		
<p>Para 5.3.7: <i>“The Council will resist the removal of significant hedgerows, particularly ancient hedgerows [...]”.</i></p> <p>Para 5.3.8: <i>“In granting planning permission for new development where significant hedgerow, including ancient hedgerows” ...</i></p>	To improve clarity in terms of the considerations that will be taken into account for the retention of hedgerows.	193_14 Katharine Fletcher, Historic England
Draft Policy 78 – Green Corridors		
Additional para 5.3.14:	To make specific references to the NPPF's	59_53

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><u><i>“The Mayor’s London All Green Grid SPG and associated area framework for Downlands provides guidance on the implementation of the policy framework in the London Plan for a green infrastructure strategy for London. It is a key document for facilitating improvements to the network, including to the broad green corridors which it identifies.”</i></u></p>	<p>requirement for LPAs to establish ecological networks as well as the All London Green Grid.</p>	<p>Matthew Frith, London Wildlife Trust</p>
<p>Draft Policy 81 - Strategic Industrial Locations</p>		
<p>Para 2 of the Draft Policy: <i>“Notwithstanding the above uses, <u>proposals on sites in the SIL where non-Class B operations are already in existence,</u>proposals should seek to provide Class B uses<u>operations.</u> Proposals involving non-Class B uses on these sites should provide employment generating uses that reinforce the role of the SIL. (INSERT SPACE) Proposals <u>in the SIL for Class B uses that include</u>involving a quantum of floorspace to be used for display and sales should demonstrate that <u>this quantum of floorspace is</u>those uses are clearly ancillary to the <u>a</u>primary Class B uses.”</i></p>	<p>For clarification of the consideration of retail and other non-B Class uses in the SIL.</p>	<p>63_2 Jonathan Best, Montagu Evans for Travis Perkins</p>
<p>Draft Policy 83 - Non-Designated Employment Land</p>		
<p>Para 3 of the Draft Policy: <i>“Proposals for change of use of non-designated sites accommodating Class B uses to a non-employment generating use will be considered on the following criteria:</i></p> <ul style="list-style-type: none"> <i>a. whether there is a demonstrated lack of demand for the existing <u>permitted uses</u>or any potential alternative, <u>employment generating use</u>including evidence of recent, active marketing of the site for reuse or redevelopment undertaken prior to the submission of a planning application over a minimum period of six months,</i> <i>b. whether all opportunities for re-let and sale</i> 	<p>Changes to remove repetition and improve clarity.</p>	<p>110_1 John Escott, Robinson Escott Planning</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>for reuse or redevelopment for employment generating uses have been fully explored, both in terms of existing and any alternative employment generating uses and layouts, including small/more flexible business units, and”</i></p>		
<p>Draft Policy 90 - Bromley Town Centre Opportunity Area</p>		
<p>Corrected reference to DP “80 76” in para 6.2.7</p>	<p>Error - paragraph 6.2.7 refers to draft policy 76 when it should refer to draft policy 80.</p>	<p>125_6 Jennifer Peters, Greater London Authority</p>
<p>Draft Policy 93 – Bromley Shopping Centre (The Glades)</p>		
<p>Para 6.2.18: <i>“...The latest GOAD report identifies 445 retail outlets which provides around 1,293,500 sq. ft. of retail floorspace. It is acknowledged that other main town centre uses can complement the function of the centre and reflect the change in consumer trends. The Glades Shopping Centre provides 464,000 sq. ft. across 135 units”.</i></p>	<p>To acknowledge that other main town centre uses can complement the function and that consumer trends are changing. The floorspace mentioned in the supporting text should reflect the floorspace within the Glades as the policy relates only to the Glades.</p>	<p>66_7 Victoria Barrett NLP for LaSalle Investment Management</p>
<p>Draft Policy 98 – Restaurants, pubs and hot food takeaways</p>		
<p>Addition to supporting text para 6.2.28 <i>“...if not carefully managed. <u>Concentrations of such uses become over concentrations, where and when there are unacceptable negative impacts relating to the level of concentration in a given area, including impacts on the vitality and viability of the centre, traffic, noise, fumes, and health”.</u></i></p>	<p>To clarify that criterion (b) tries to avoid over concentration of restaurants, fast food takeaways etc. where the negative impacts make such concentrations unacceptable.</p>	<p>66_8 Victoria Barrett NLP for LaSalle Investment Management</p>
<p>Draft Policy 111 - Crystal Palace SOLDC</p>		
<p>Para 6.4.7, line 4: <i>“The Grade II* listed historic <u>Metropolitan Park</u>”</i></p> <p>Para 6.4.12: <i>“The Grade II Listed centre is a historically significant sports and leisure facilities <u>which is used to host national and international sporting events and has been used to host Olympic training events”.</u></i></p>	<p>Correction.</p> <p>Correction due to inaccurate statement that the National Sports Centre is no longer suited to Olympic use.</p>	<p>111_4 Francis Bernstein</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>outline planning permission for the duration of 15 years. The Masterplan seeks to restore and improve the park and reinstate its national and international status. The park presents opportunities to encourage growth of more than sub-regional importance beyond its boundaries particularly through visitor spend in Crystal Palace and other neighbouring town centres within the Crystal Palace, Penge and Anerley Renewal Area. Planning permission was granted for a masterplan which seeks to restore and improve the park and reinstate its national and international status. The delivery of key capital projects is already underway, such as that of the restoration of the Dinosaurs. The GLA has also been considering options for elements of development and redevelopment on the site of the National Sports Centre.”</i></p> <p>Para 6.4.12.: <i>“The Grade II* Listed centre is a historically significant sports and leisure facility [...].”</i></p> <p>Para 6.4.14: <i>“The Council will work with the Mayor of London, Historic England and other stakeholders to identify adequate development capacity and ensure it supports the SOLDC designation should any development come forward”.</i></p> <p>End of para 6.4.15: <i>“The park itself is a Grade II* Listed park on Historic England’s Register of Historic Parks and Gardens which includes a large number of significant assets including the Grade II* Listed National Sports Centre, the Grade II listed upper and lower terraces of the Crystal Palace Gardens, lower palace station, bust of Sir Joseph Paxton, gatepiers to Rockhill, Royal Naval Volunteer</i></p>	<p>Correction.</p> <p>Recognised that Historic England will be a key stakeholder in the seeking to identify the adequate development capacity.</p> <p>Changes highlight the significance of heritage assets in Crystal Palace.</p>	
--	--	--

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<p><i>Reserve Trophy War Memorial and the Grade I prehistoric animal sculptures and geological formations by the lake.</i></p>		
<p>Draft Policy 123 - Sustainable Design and Construction</p>		
<p>The final bullet point at para 7.0.59: <i>“Promote and protect biodiversity and green infrastructure including space for food growing where appropriate”</i></p>	<p>To make reference to the requirement for provision of growing spaces in line with the Mayor’s Sustainable Design and Construction SPG.</p>	<p>43_6 Sarah Williams, Sustain (also 43_3 – DP 13 & 43_4 - DP 24)</p>
<p>Draft Policy 125 – Delivery and Implementation of the Local Plan</p>		
<p>Para 8.0.3: <i>‘Where existing and planned provision of infrastructure, facilities and services are inadequate to meet the needs generated by a proposal, the Council will negotiate planning obligations or agreements (s106 and/or s278 of the Highways Act 1980) to secure measures to meet those needs’.</i></p> <p>Para 8.0.5: <i>“Pooled contributions will be used within the restrictions of the CIL Regulation 123; however, there is no limit for the pooling of s278 agreements.”</i></p>	<p>To make references to s278 in addition to s106.</p>	<p>62_2 Cherrie Mendoza, Highways England</p>
<p>Policies Map Set 2 – Green Belt and Urban Open Space</p>		
<p>Policies Map Set Part 2 - Table “Changes to Green Belt Designations” - Site 27 Allotments between Former Blue Circle Sports Ground and Turpington Estate: <i>“GB to UOS For Education Purposes (also shown on UOS changes)”</i></p> <p>Map pg. 16 of 44 Policies Map Set Part 2 ‘Proposed Changes to Green Belt Designations’: Deletion of reference to Education purposes on Site 27</p> <p>Proposed Local Green Space Site 65 – Bull Lane Allotments:</p>	<p>Amendments for correction and clarification.</p>	<p>45_1 Mary Dawes, Bromley Common Allotment Garden Association</p>

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>"These allotments established in 1926 and laid out by local people, are the allotment site with the largest capacity within a one kilometre radius"</i>		
Policies Map Set Part 2 – Local Nature Reserves		
Amend the boundary of the 'Darrick and Newstead Woods' Local Nature Reserve to correct the error	Correction.	159_1 Judith John
Policies Map Sets – Additional Designations required		
The designation of Historic Parks & Gardens and Scheduled Monuments will be identified on the Local Plan Maps.	Amendment for clarity.	193_18 Katharine Fletcher, Historic England
Section 9 - Glossary		
A separate definition for the Bromley Biodiversity Plan will be added to the glossary.	To improve clarity & understanding.	59_63 Matthew Frith, London Wildlife Trust
Glossary: <i>"Areas of Archaeological Significance (AAS): These demarcate areas with the potential to have architectural interest. Their primary purpose is to help highlight at an early stage where a development proposal may affect heritage assets of archaeological interest and so trigger early consultation with the borough's archaeological adviser on the need for site specific assessment and field evaluation."</i>	To improve clarity.	193_13 Katharine Fletcher, Historic England (Draft Policy 46)
Appendix 10.6 – Areas of Special Residential Character		
ASRC description for Chelsfield Park line 13: <i>"The estate also comprises areas of greenbelt which include woods and agricultural grazing land. These are partly designated as a Grade I Site of Interest for Nature Conservation which includes species rich grassland"</i> .	To make reference to the SINC containing species-rich grasslands in addition to the "areas of greenbelt which include woods".	69_64 Matthew Frith, London Wildlife Trust
Appendix 10.8 – Local Green Space Sites		
Site 54 Hollydale Open Space: <i>"Hollydale Hollydale"</i>	Correction.	119_4 Ken Lewington for the Crystal Palace Foundation
Site 48 Chislehurst Recreation Ground, Walden Woods, Whytes Woods and Walden Woods, para. 3: <i>"There are also a range of recreational facilities: The Invicta Scouts hut is located on Chislehurst</i>	To highlight that the recreation ground is financially supported by the local football association and by the football foundation.	71_16 Tony Allen, Chislehurst Society

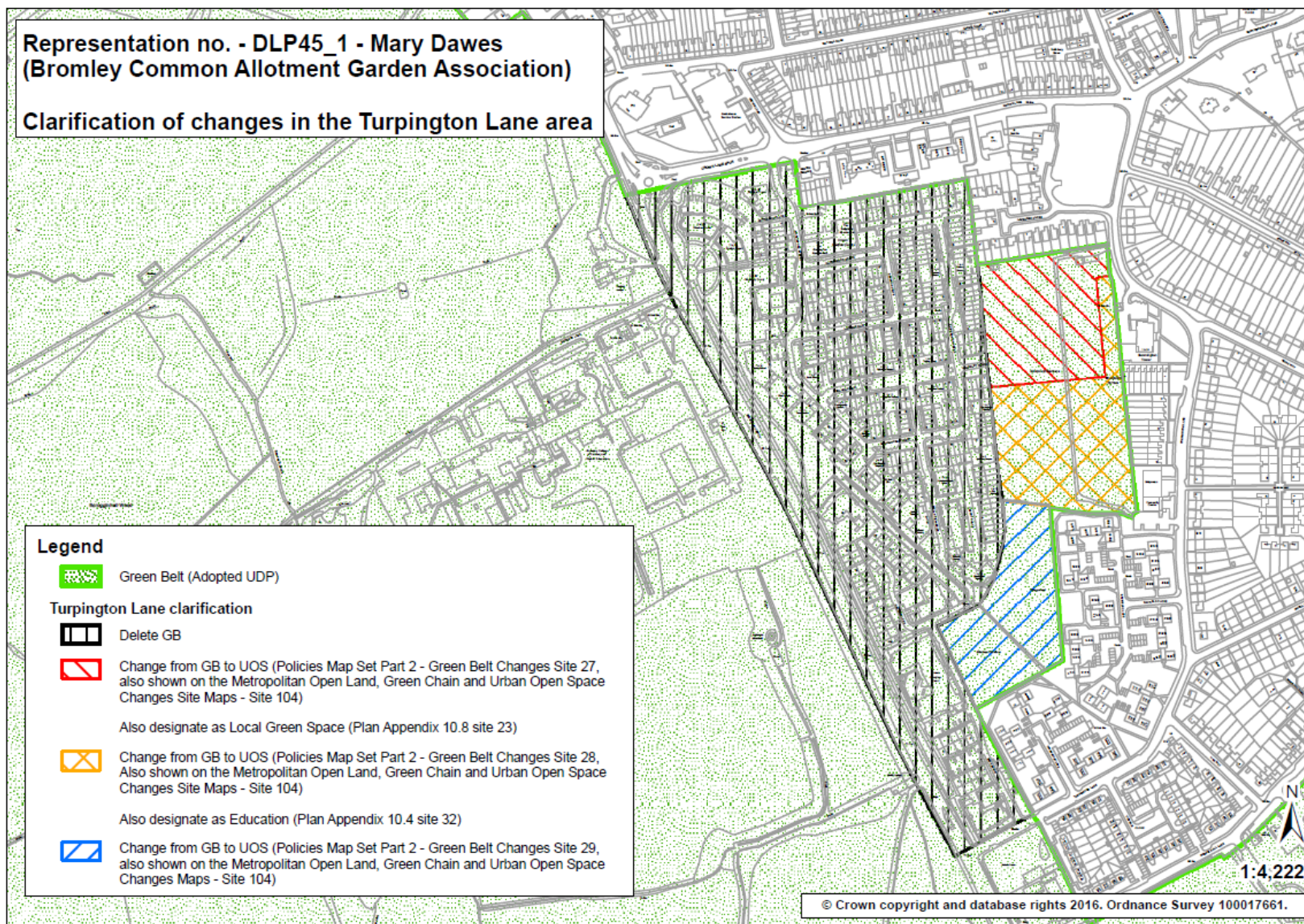
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

<i>Recreation Ground, which is also home to Elmstead FC which secured funding to improve the now floodlit football pitches, (there is a kickabout on the site) and Chislehurst Tennis Club.</i>		
Site 54 Hollydale Open Space, para 3: “... obtained by the Friends of Havelock Recreation Ground Hollydale Open Space. ”	Correction.	Email dated December 13 2016 Iain Tulloch, Friends of Hollydale Open Space
Appendix 10.9 Shopping Frontages		
Add reference to Eldred Drive, Orpington into neighbourhood centres and Parades	Correction	Officer suggestion
Additional inclusion of Maple Road units (83-101 excluding existing residential units) as a shopping frontage.	Correction	Officer Suggestion
Appendix 10.12 – Monitoring Framework		
The demolition of locally listed buildings can be monitored internally and should be included as part of the monitoring framework. The Key policies column will be amended to reflect all relevant policies.	To reflect all relevant policies, such as Locally Listed Buildings and Conservation Areas.	181_10 Peter Martin
Appendix 10.13 - IDP Schedule Table		
A21 Masons Hill - B265 - Delete text ‘ Crown ’ Lane insert ‘Hayes’ Lane	Correction.	39_10 Andrew Dorrian, Transport for London
Roads Add ‘s278’ as a possible ‘Funding Source’.	Correction.	39_10 Andrew Dorrian, Transport for London
Oakley Rd/Bromley Common – amend text: ‘ Realignment and signalisation ’ of junction.’	Correction.	39_10 Andrew Dorrian, Transport for London
Cycling and Walking - Amend table entry: “ Schemes to improve safety at A21 Kentish Way/Stockwell Close A21 Farnborough Way, 100m north of Green Street Green. ”	Correction.	39_10 Andrew Dorrian, Transport for London
Appendix 10.14 – Office Clusters		
Alteration to the boundary within the Knoll Rise, Orpington Town Centre Map	Correction.	Officer suggestion.

**Representation No. - DLP45_1 - Mary Dawes
(Bromley Common Allotment Garden Association)**

Clarification of changes in the Turpington Lane area

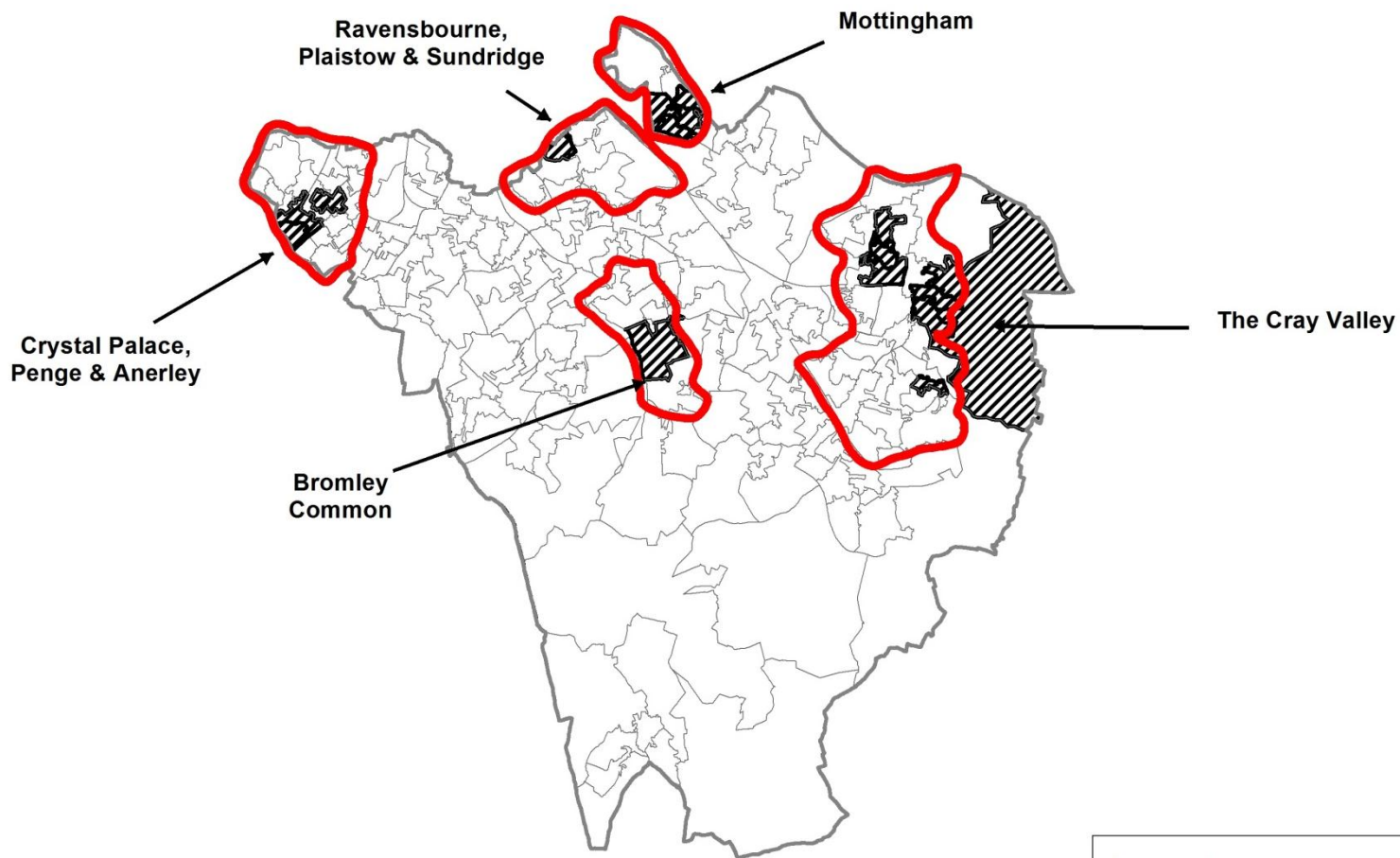
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications




**Representation No. - DLP116_1 - John Escott
(Robinson Escott Planning)**

Amendment of map for Black and White

**Indices of Deprivation 2015 (Lower Level SOA's)
20% most deprived LSOAs**



Legend

-  Renewal Areas
-  20% Most Deprived LSOAs

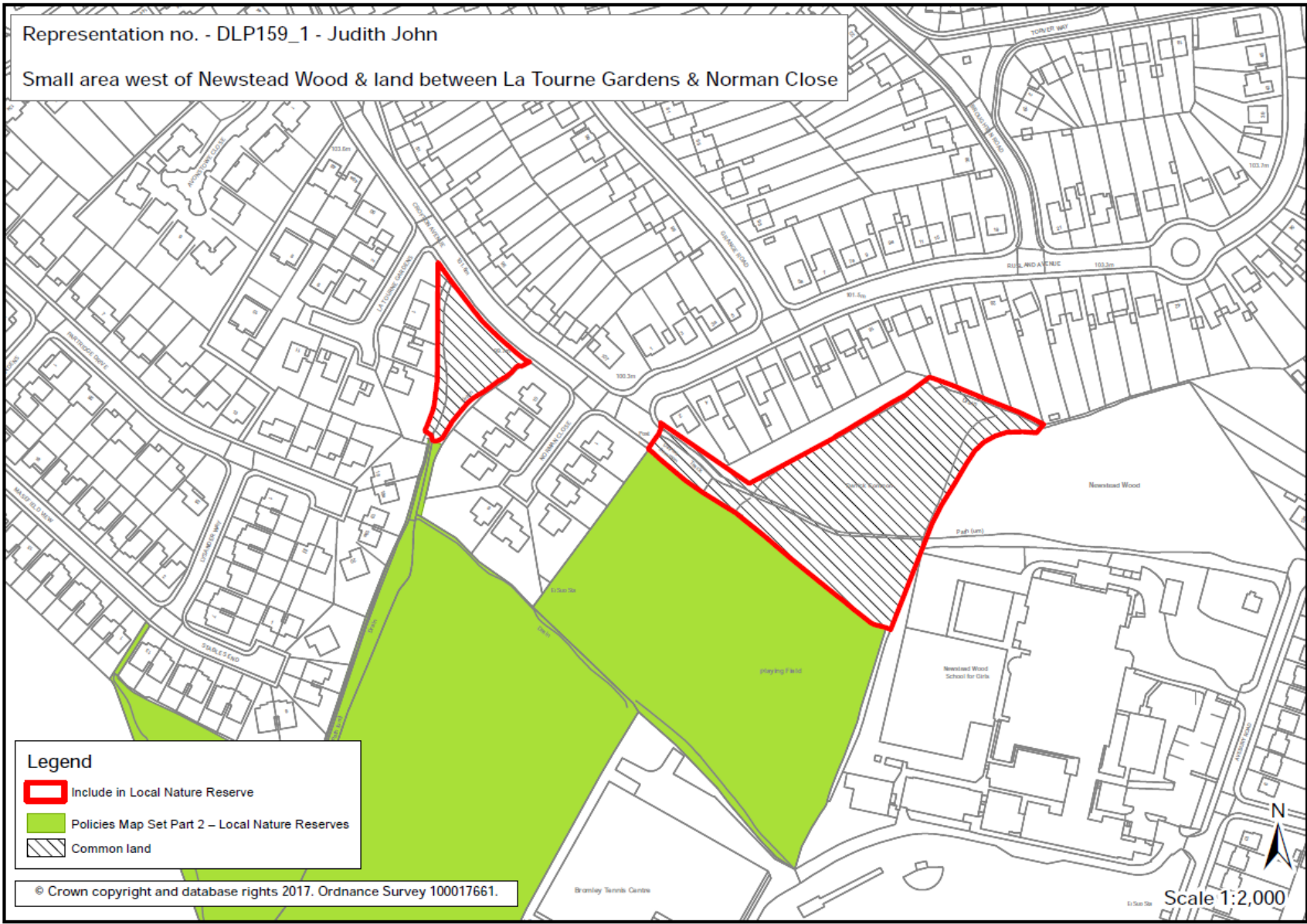
© Crown copyright and database rights 2017. Ordnance Survey 100017661.

Note: The IMD data is copyright of the Department of Communities and Local Government

Representation No. - DLP159_1 - Judith John

**Small area west of Newstead Wood & land between
La Tourne Gardens & Norman Close**

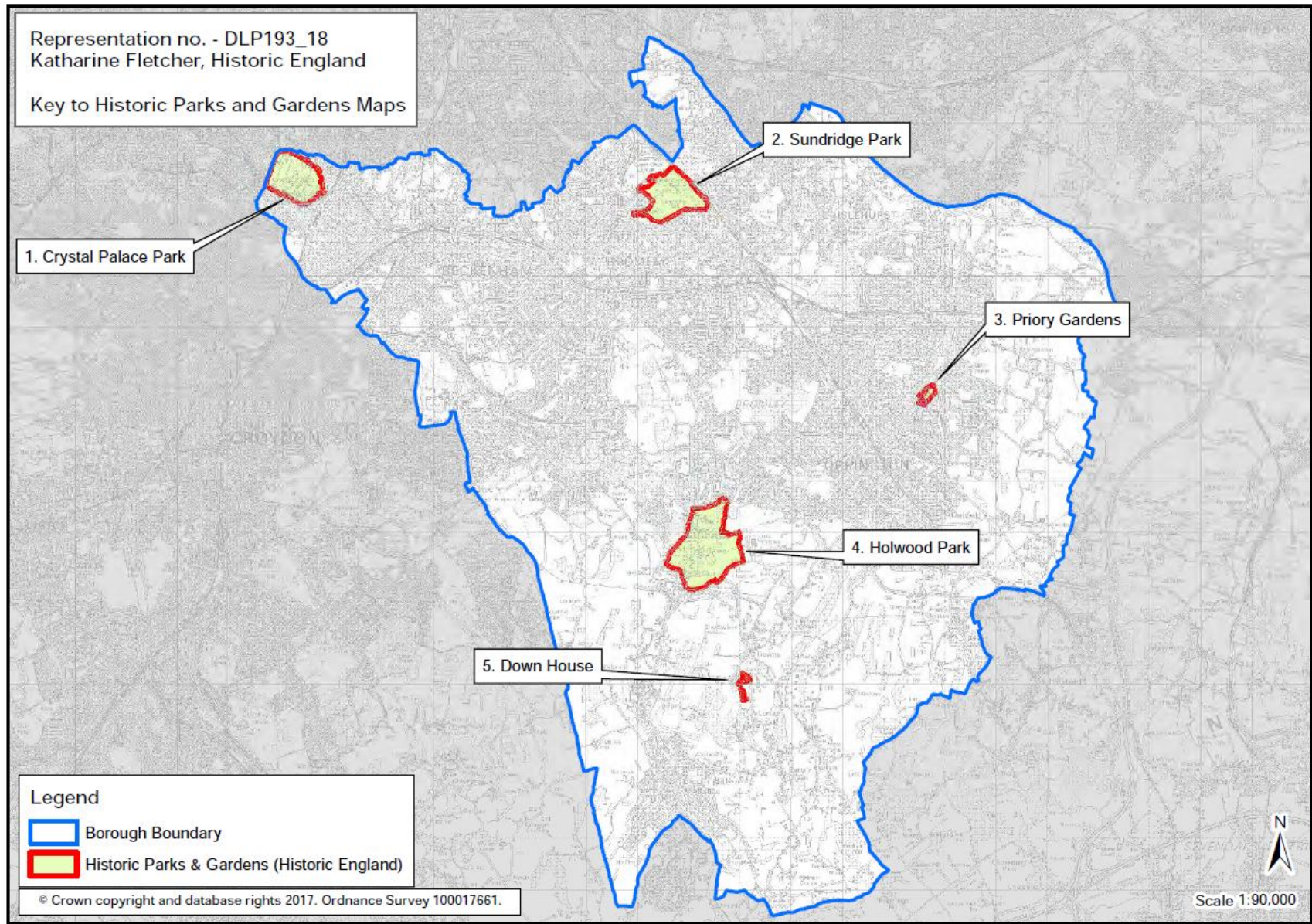
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



Representation no. - DLP193_18 - Katharine Fletcher, Historic England

National Register of Parks and Gardens of Special Historic Interest

Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

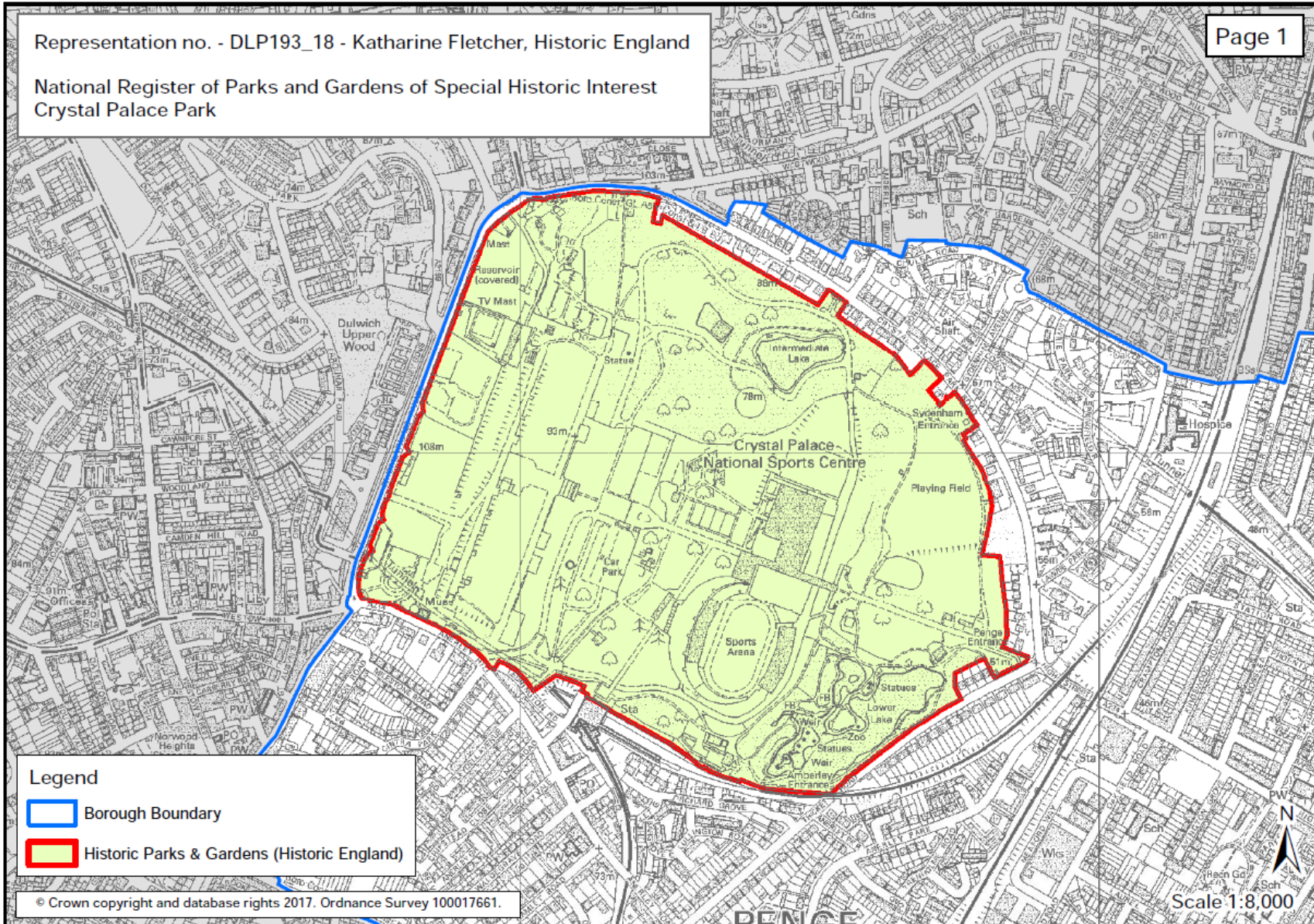


Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

Representation no. - DLP193_18 - Katharine Fletcher, Historic England

National Register of Parks and Gardens of Special Historic Interest
Crystal Palace Park

Page 1

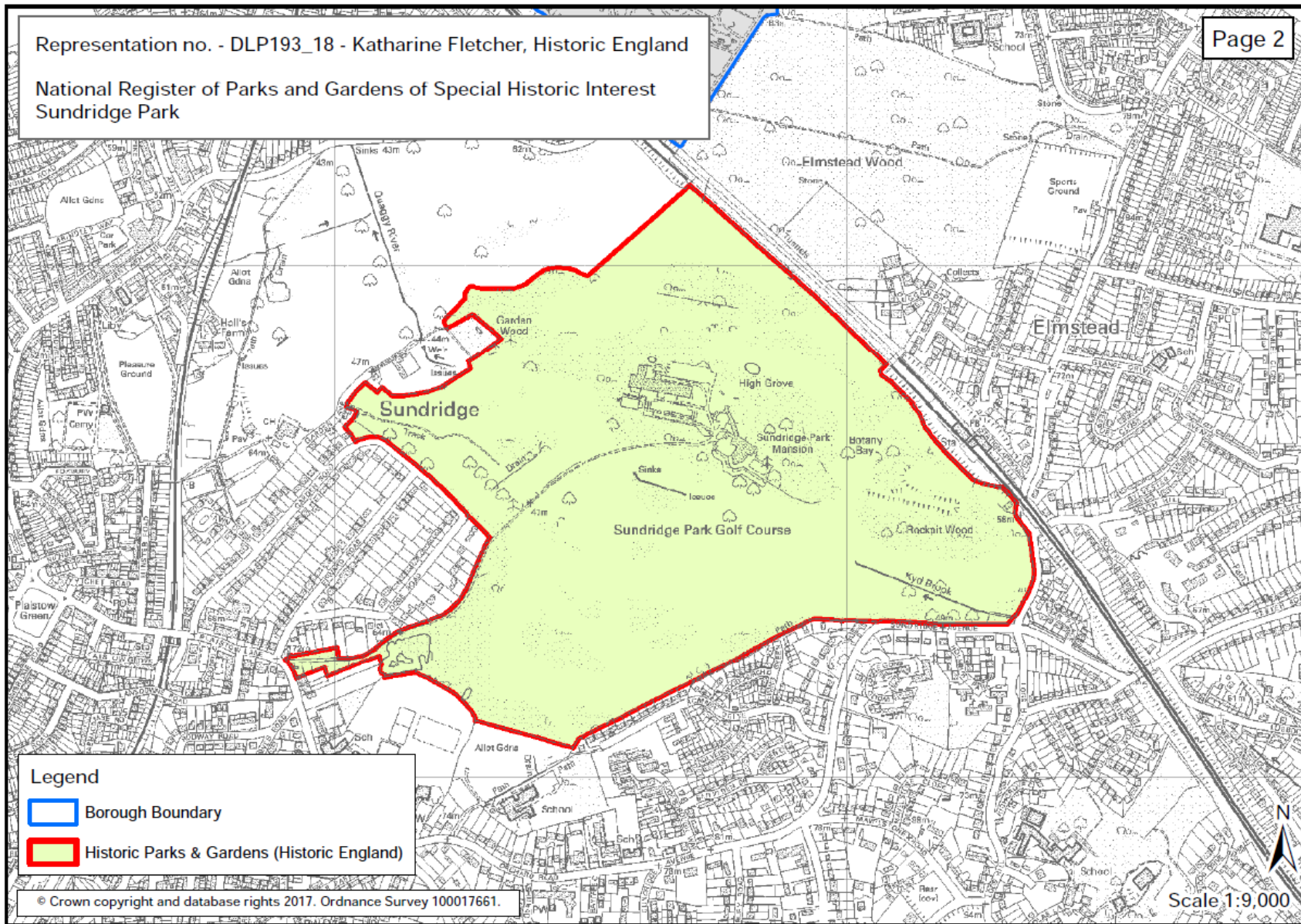


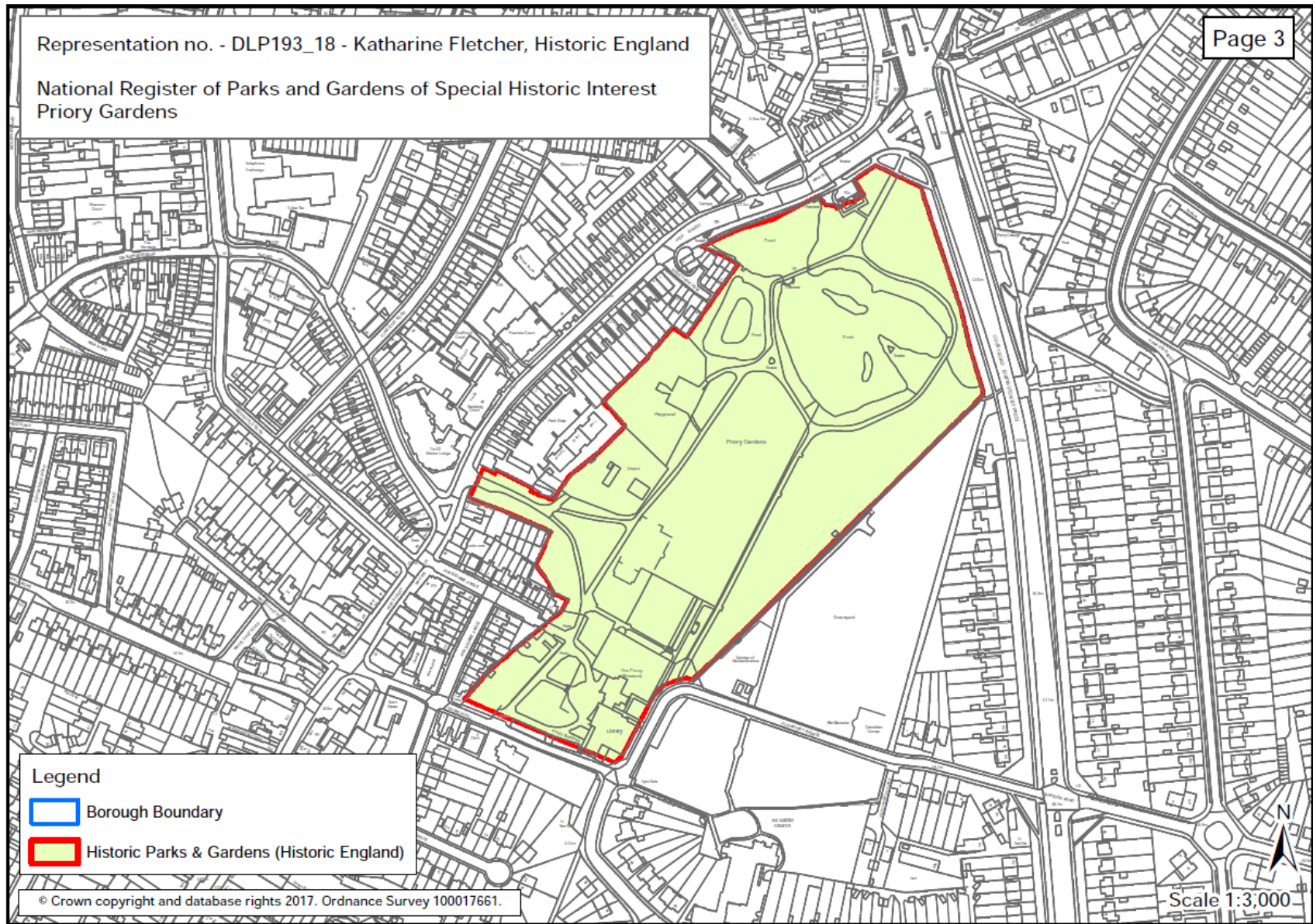
Legend

-  Borough Boundary
-  Historic Parks & Gardens (Historic England)

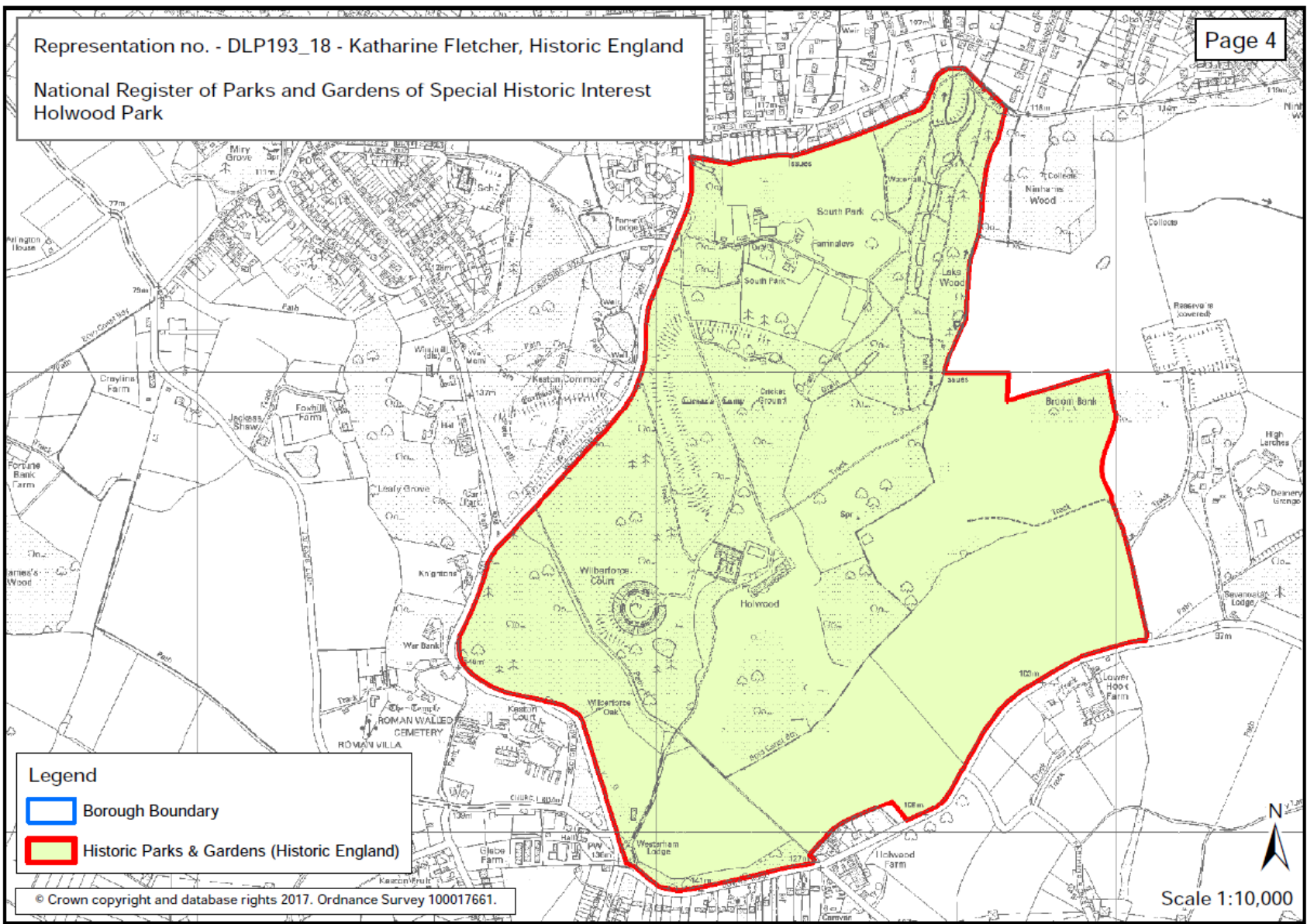
© Crown copyright and database rights 2017. Ordnance Survey 100017661.

Scale 1:8,000





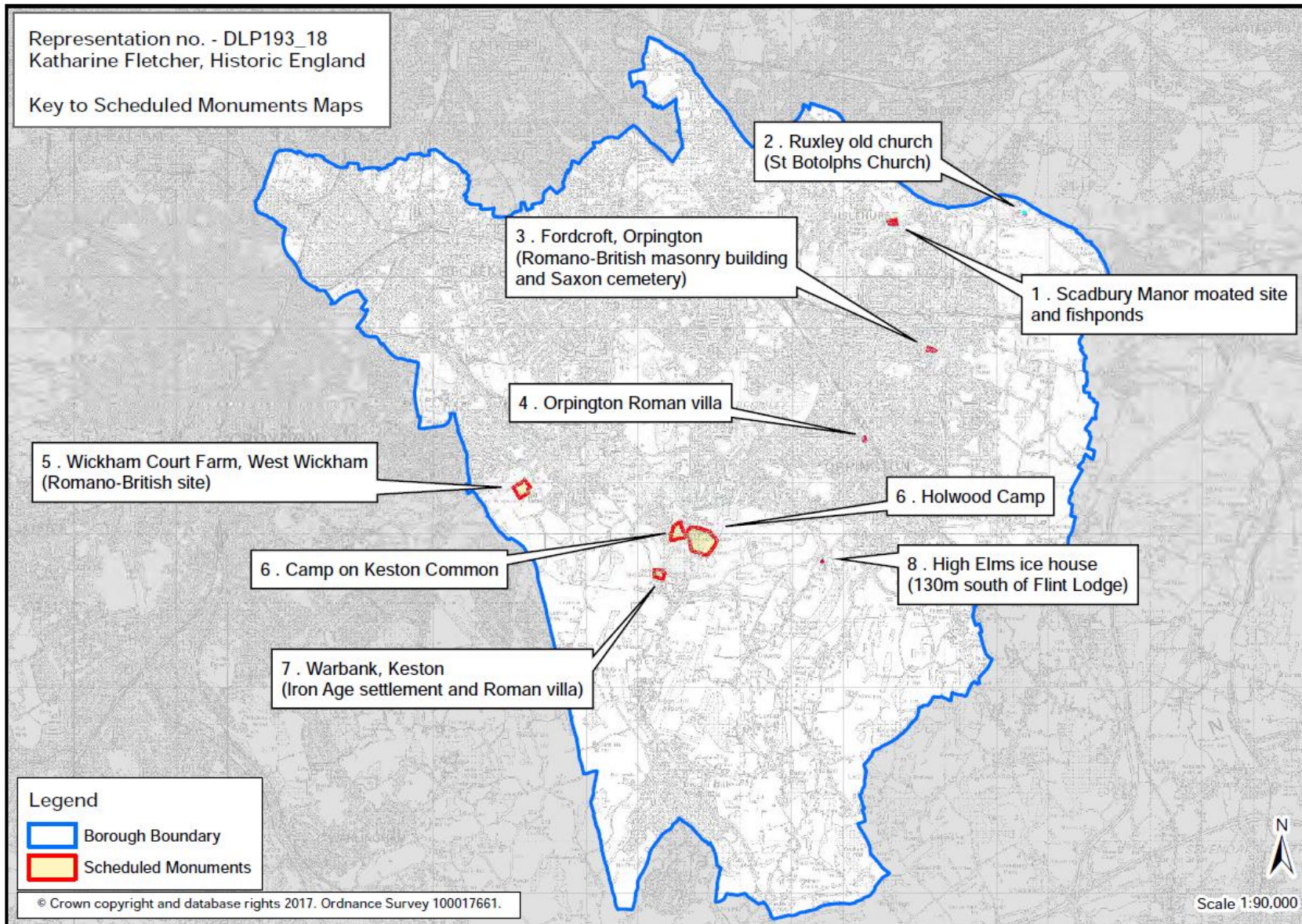
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



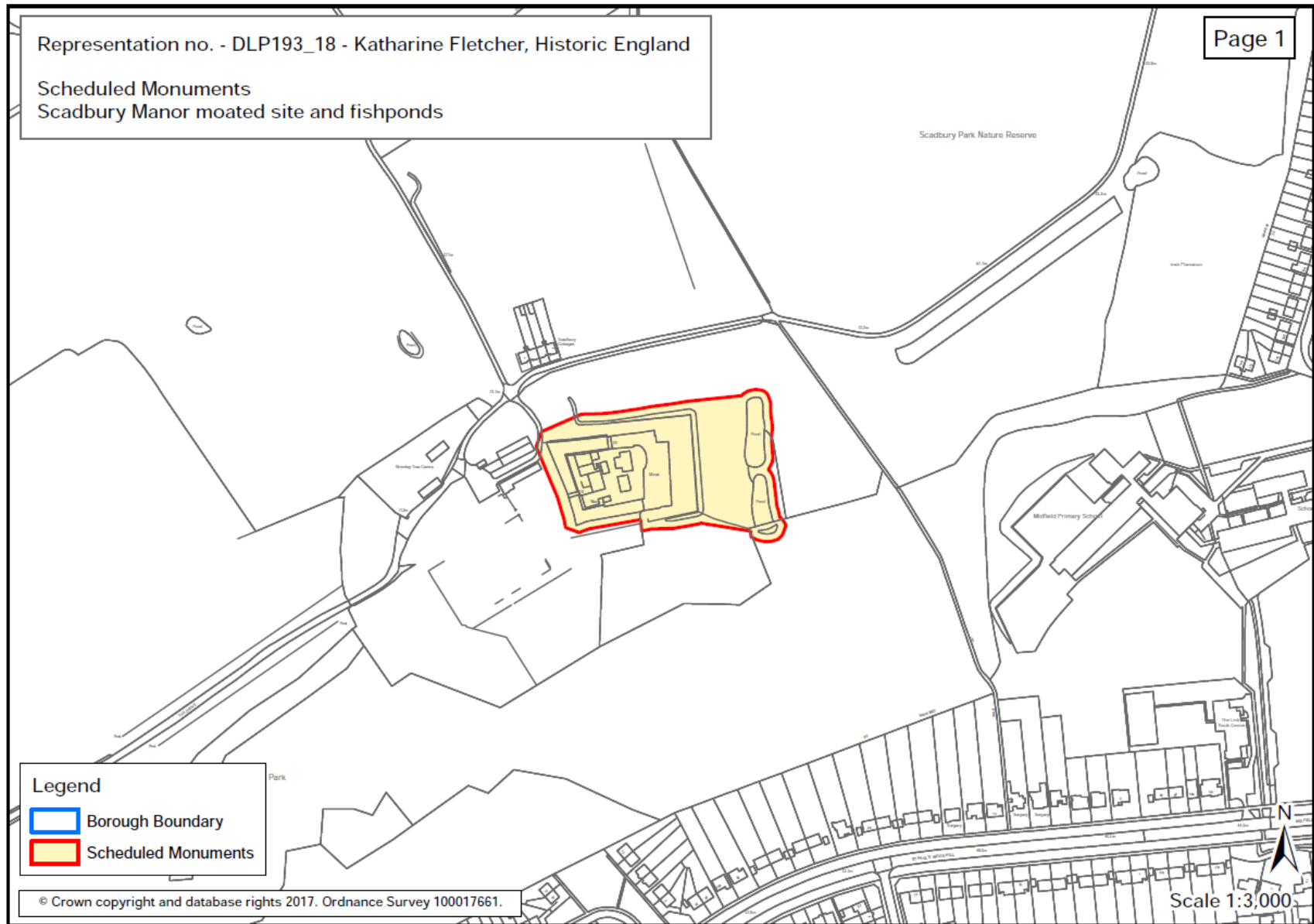
Representation no. - DLP193_18 Katharine Fletcher, Historic England

Scheduled Monuments

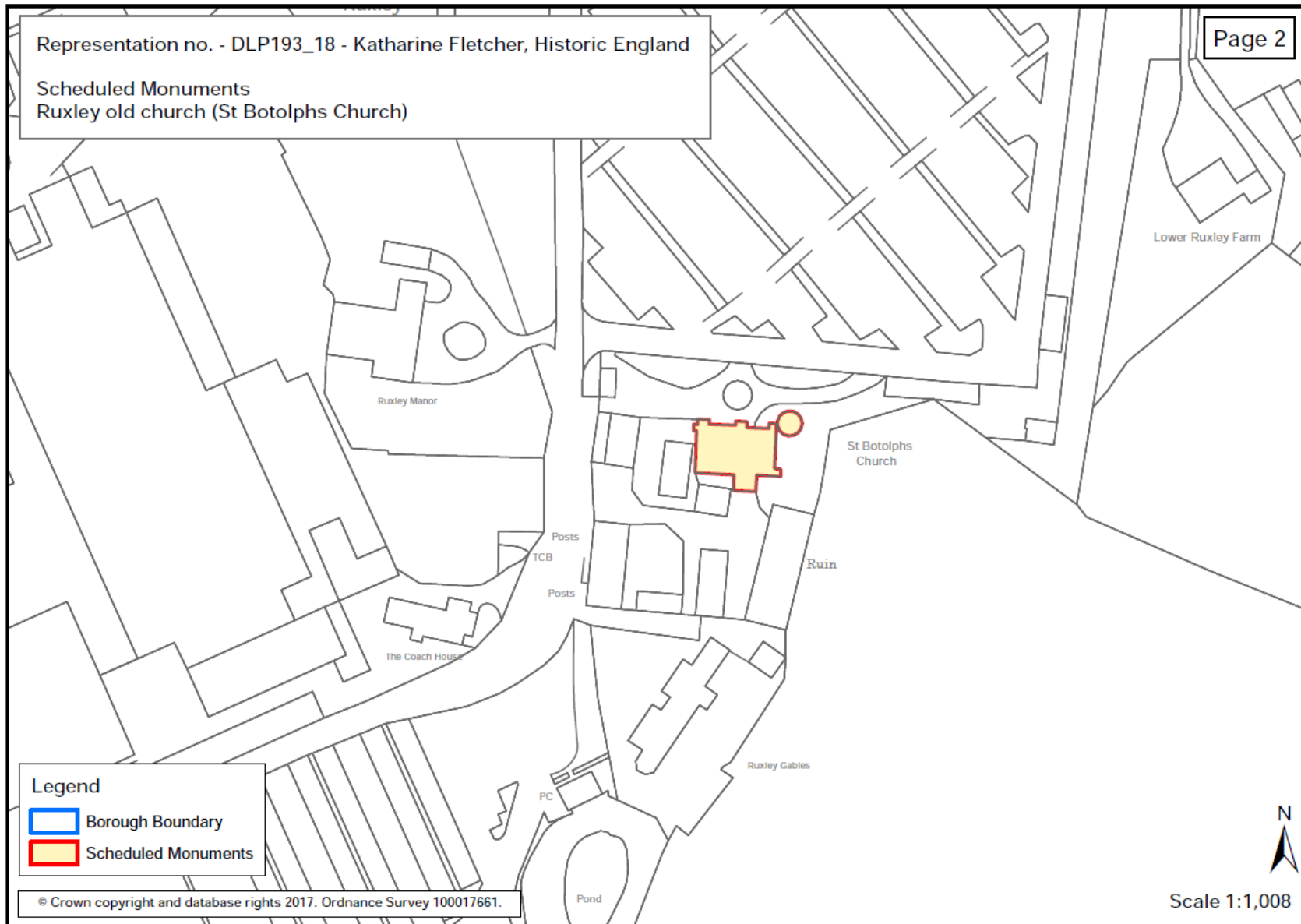
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



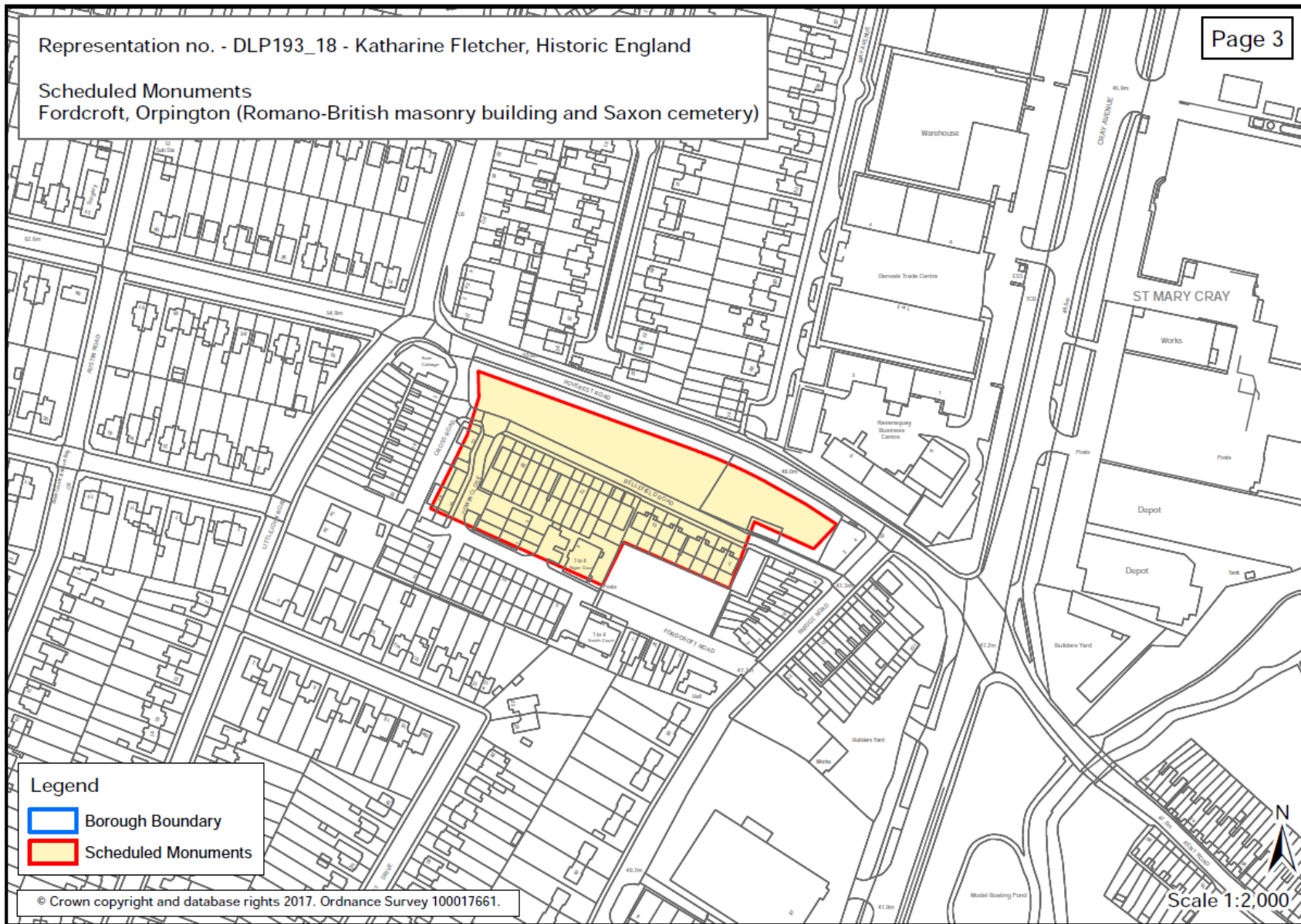
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



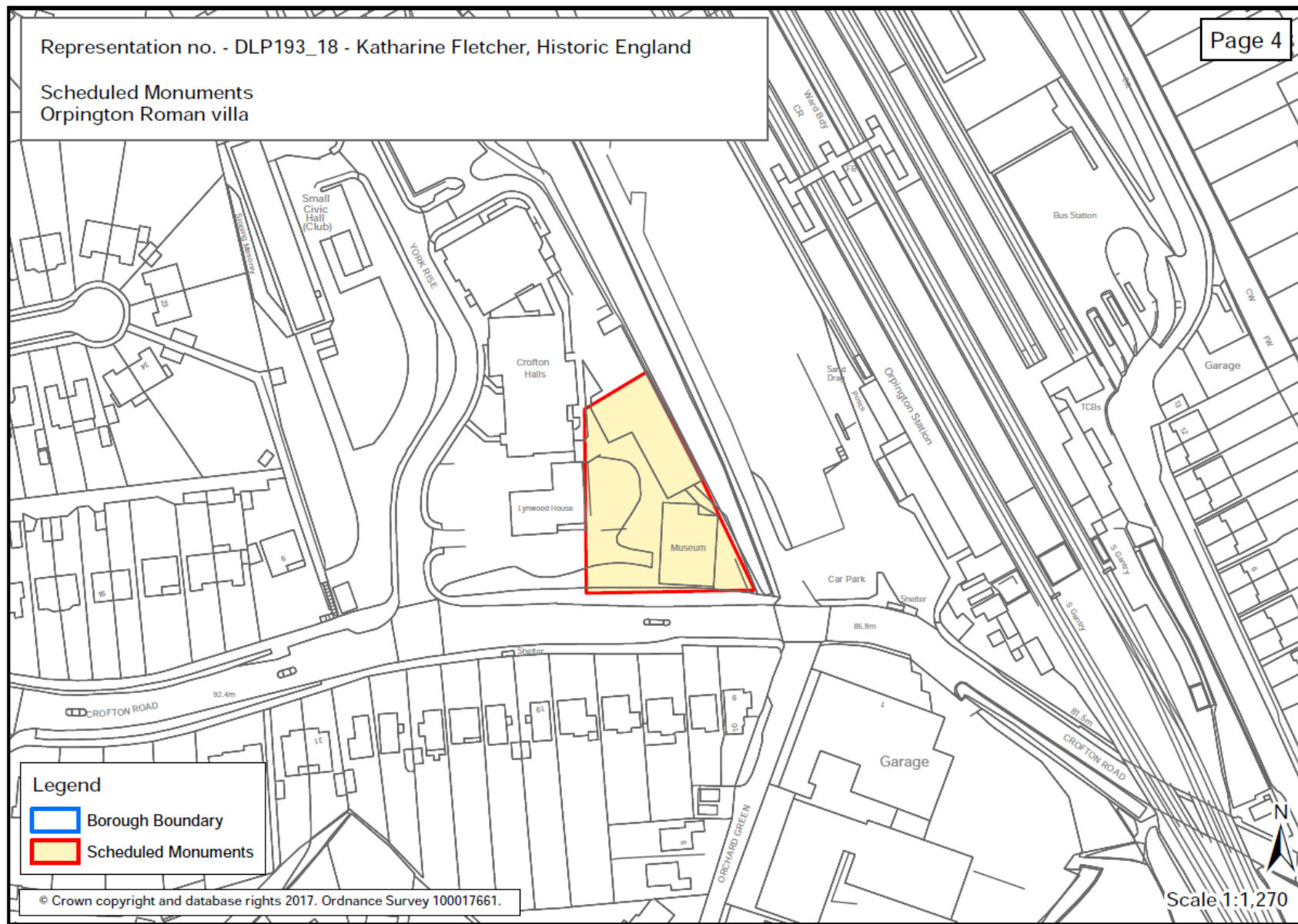
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

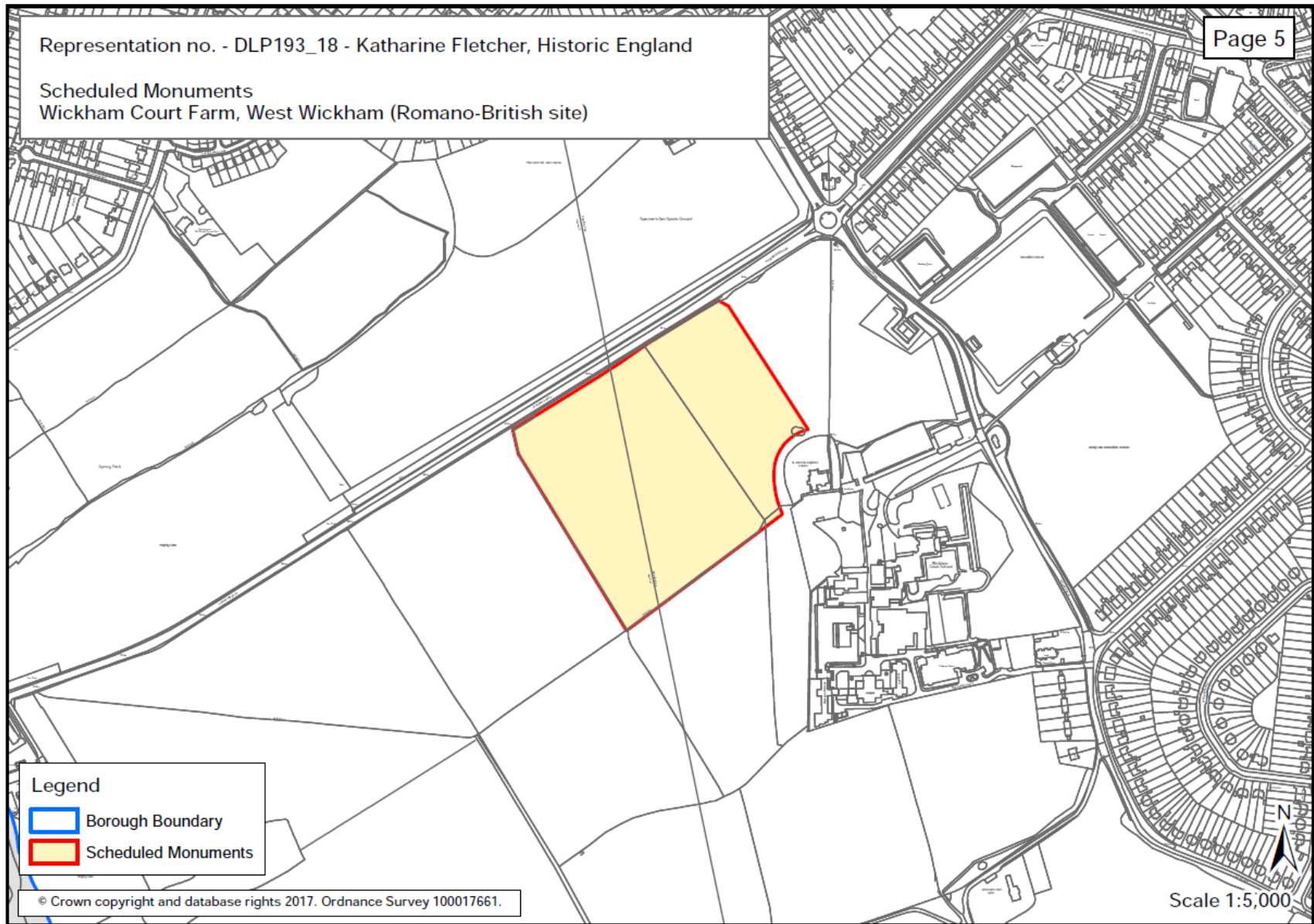


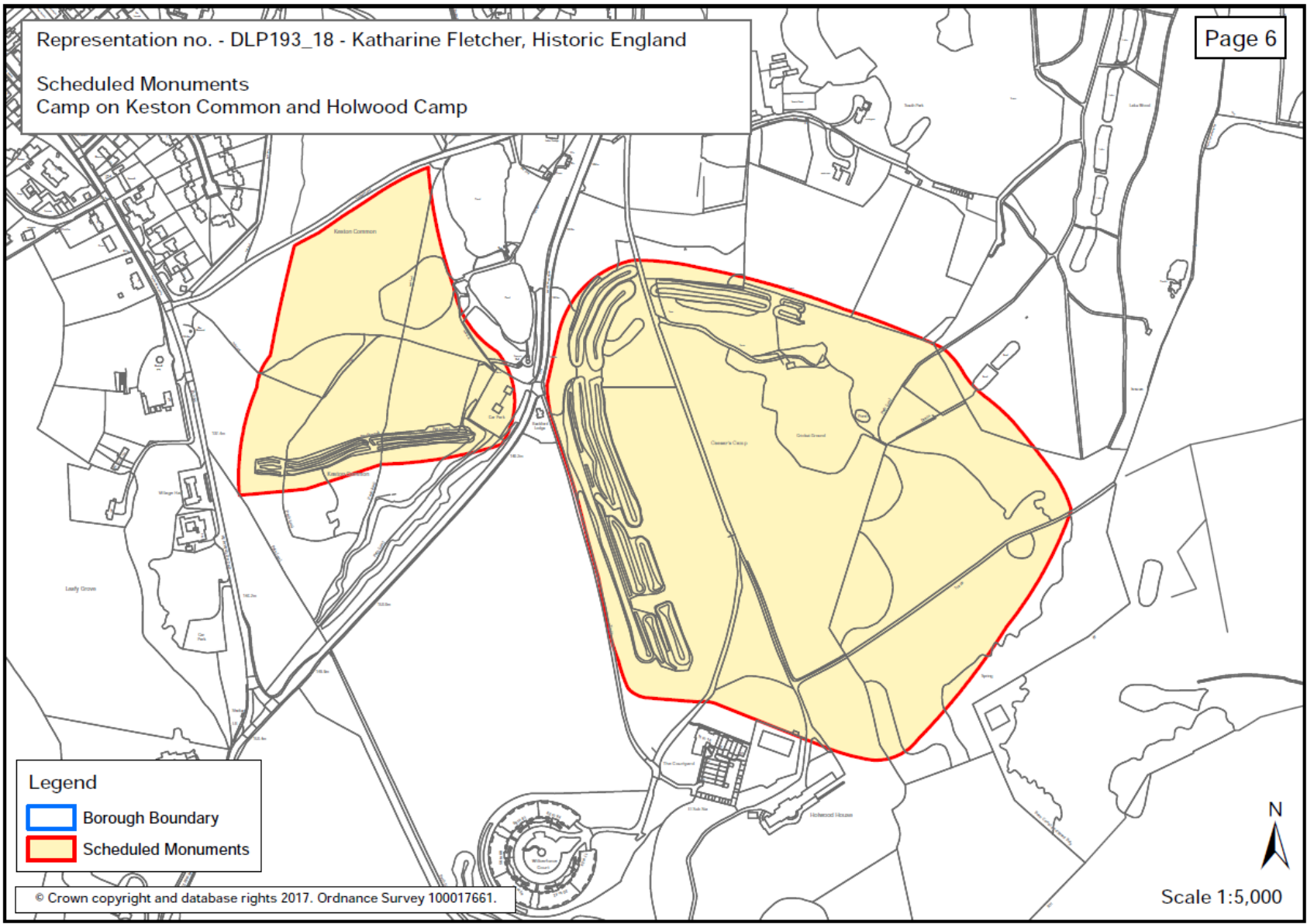
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



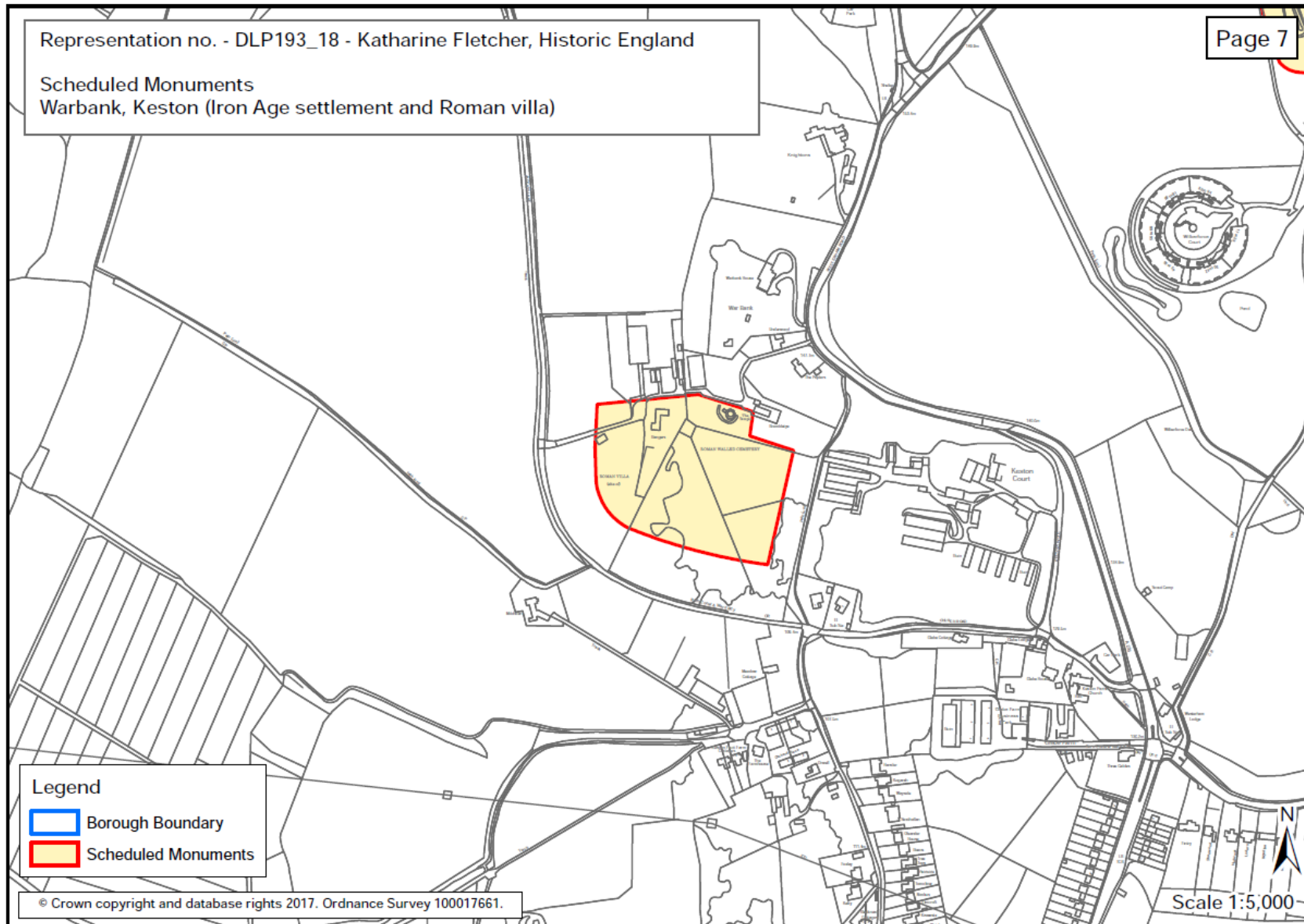
Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications







Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications



Bromley Proposed Submission Draft Local Plan 2017 – suggested modifications

