

Bromley Proposed Submission Draft Local Plan consultation 2016

Summary of Responses June 2017

PDF 1 – Contents

Policies or site without any representations are highlighted (orange)

Section	Policy/ Site	Page no.
Chapter 1 – Introduction		
Section 1.2	About the Local Plan	1
Section 1.3	Vision and Objectives	4
Section 1.4	Spatial Strategy	7
Chapter 2 Living in Bromley		
Section 2.1	Housing	11
Policy 1	Housing Supply (including Appendix 1 – Housing Trajectory)	13
Appendix 10.2 Housing allocations		
<i>Site 1</i>	<i>Bromley Civic Centre</i>	<i>59</i>
<i>Site 2</i>	<i>Land adjacent to Bromley North Station</i>	<i>63</i>
<i>Site 3</i>	<i>The Hill Car Park and adjacent lands</i>	<i>74</i>
<i>Site 4</i>	<i>Gas holder site, Homesdale Road</i>	<i>76</i>
<i>Site 5</i>	<i>Land adjacent to Bickley Station</i>	<i>78</i>
<i>Site 6</i>	<i>Bromley Valley Gym and adjacent land, Chipperfield Road and adjoining land</i>	<i>79</i>
<i>Site 7</i>	<i>Orchard Lodge, William Booth Road</i>	<i>80</i>
<i>Site 8</i>	<i>Bassetts Campus, Broadwater Gardens</i>	<i>81</i>
<i>Site 9</i>	<i>Former Depot, Bruce Grove, Orpington</i>	<i>82</i>
<i>Site 10</i>	<i>West of Bromley High Street and land at Bromley South</i>	<i>83</i>
<i>Site 11</i>	<i>18-44 Homefield Rise, Orpington</i>	<i>90</i>
<i>Site 12</i>	<i>Small Halls, York Rise, Crofton Road</i>	<i>91</i>
<i>Site 13</i>	<i>Banbury House, Bushell Way, Chislehurst</i>	<i>93</i>

Bromley Proposed Submission Draft Local Plan consultation 2016 – Summary of Responses, June 2017

Chapter 1 – Introduction

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 1.2 – About the Local Plan				
1_1	Adrian Lawrence, Lanniston Developments Ltd	<p>The Plan has been produced with biased input and without engaging the property development community including local house builders.</p> <p>There is little evidence of inter-borough cooperation.</p>	<p>The views of local residents, businesses and interest groups have been considered carefully throughout the development of the Local Plan. There have been five periods of consultation which have been widely publicised and hundreds of representations have been received, including from local and national house builders and the House Builders' Federation.</p> <p>Further details of how the plan has been developed are set out in the Consultation Statement to be submitted with the Plan for Examination.</p> <p>Also see Policy 1 – Housing Supply (representation 1_2) set out the Council's cooperation with neighbouring boroughs on housing matters.</p>	No modification.
19_1	Catherine McRory, Royal Borough of Greenwich	The Royal Borough of Greenwich does not have any concerns regarding the legal compliance and soundness of the document and consider that its preparation has been in compliance with the Duty to Cooperate.	Noted.	No modification.
30_1	Mr Hough, Sigma planning services for South East Living group	The Duty to Cooperate has not been properly discharged. Bromley has a shortfall in meeting affordable housing needs. It has the potential to review Green Belt boundaries to provide more housing without serious harm to the Green Belt. Bromley should have discussed with its 9 neighbours to see whether they can help meet the shortfall in housing need. No evidence of how it has met this duty has been provided.	See response to representation 30_4 – Policy 1 – Housing Supply.	
71_1	Tony Allen, The Chislehurst Society	Effective implementation of the various strategies and policies will be key to achieving the vision. There are a number of instances where the Society is already concerned that Bromley does not now follow through with effective implementation or enforcement of policies. How	The Planning and Compulsory Purchase Act states that an application for planning permission should be determined in accordance with the Development Plan (in Bromley's case a combination of the UDP/ Local Plan, the London Plan and the Bromley Town Centre Area Action	No modification.

		can residents be assured that this will be different in future?	Plan) <i>unless material considerations indicate otherwise</i> . This flexibility allows the planning system to take account of unforeseen situations and prevents rigid application of policies that may prevent sustainable development.	
83_1	Matthew Spry, NLP for Biggin Hill Airport Ltd	<p>The Sustainability Appraisal fails to demonstrate how alternative approaches to Green Belt release have been appraised. The Draft Plan may not have been published in accordance with the regulations as the required consultation period did not commence from publication of the final evidence base on the online portal.</p> <p>The Draft Plan is not in conformity with the London Plan as it fails to allow for adequate development capacity to realise the potential of the SOLDC.</p>	<p>The key requirement is for the Sustainability Appraisal (SA) Report to present an appraisal of “reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”, and that requirement was met by the SA Report (2016).</p> <p>The ‘regulatory checklist’ presented as Appendix 1 to the SA Report serves to explain more precisely where the regulatory requirements were met within the SA Report. The checklist explains that the appraisal of reasonable alternatives is the focus of Chapter 7, whilst “<i>Chapters 5 and 6 deal with ‘reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options.</i>”</p> <p>The SA Report did not present an appraisal of alternatives, in relation to the matter of the SOLDC because the Council’s view was that there was no reasonable need for it to do so. ‘Outline reasons’ to explain this position were presented at para 6.3.1.</p> <p>Formal consideration of alternatives for each and every plan issue, in the case of a plan such as the Bromley Local Plan, would clearly not be proportionate. The plan comprises 125 policies, plus there are 67 site allocations.</p> <p>However, it is acknowledged that the SOLDC is an important policy area, and so further consideration will be given to the possibility of developing, appraising and consulting on reasonable alternatives.</p> <p>Comments relating specifically to the SOLDC are set out in the table for Section 6.3 – Biggin Hill SOLDC.</p>	No modification

88_1	Lily Mahoney, Sevenoaks District Council	Sevenoaks welcomes the ongoing Duty to Cooperate discussions with Bromley to address key cross boundary issues. Sevenoaks believes that Bromley's approach to the Local Plan is positive and proactive in light of current national planning policy.	Noted.	No modification.
94_6	Clare Loops, London Borough of Bexley	Bexley has an ongoing and effective relationship with the London Borough of Bromley as part of a long-established group of south east London boroughs. This includes working on cross-borough strategic matters including waste management, housing need and flood risk management. Bexley is satisfied that Bromley has fulfilled its Duty to Cooperate and is supportive of the approach to collectively meeting targets for those matters of a strategic nature. Bexley considers the Proposed Submission Local Plan to be sound.	Noted.	No modification.
122_11	Sean McGrath, Indigo Planning for Land Improvement Holdings	<p>The evidence base does not contain an audit trail of compliance with the Duty to Cooperate.</p> <p>The combination of the 2013 and 2016 Sustainability Appraisal Reports does not satisfy the requirements of the SEA regulations.</p> <p>The Draft Local Plan evidence does not include a Public Sector Equalities Duty audit report.</p>	<p>A Duty to Cooperate statement will be submitted alongside the Draft Local Plan for Examination, in accordance with the Town and Country Planning regulations 2012.</p> <p>The Sustainability Appraisal began with a scoping exercise in 2013 and a report on the Options and Proposed Strategy consultation in 2013. Another report was published alongside the Draft Policies and Designations consultation in 2014 (this was supplemented by a separate Site Assessment appraisal). The last report accompanied the Draft Local Plan in 2016. It is considered that the Appraisal has therefore been integral to the plan development from the outset and has tracked and influenced the strategic and policy alternatives in accordance with the regulations.</p> <p>The Sustainability Appraisal is an integrated appraisal which covers the requirements of the Duty,.</p>	<p>No modification</p> <p>No modification</p> <p>No modification</p>
134_1	Chris Francis, West and Partners for Dylon 2 Ltd	Para 1.2.3 The Council's definition of material considerations as "significant matters" – is incorrect in planning and legal terms.	This section is does not set out policy nor definitions or use in decision making, rather it is intended to set out a very simple and accessible explanation of the purpose of the plan. This section will be updated on adoption and as such	No modification.

			it is not considered necessary to make any amendments.	
135_1	Chris Francis, West and Partners for Relta Ltd	As above	As above	As above.
193_1	Katharine Fletcher, Historic England	Para 1.2.27 - In order to reflect the NPPF positive approach of seeking economic, social and environmental <i>gains</i> jointly and simultaneously (para 8) we suggest the second sentence is amended to ‘...through the NPPF, London Plan and the emerging Local Plan is balancing <u>and seeking positive gains for the economic, social and environmental well-being of the Borough</u> ’.	Suggested modification accepted – this better reflects the tenet of sustainable development.	<u>Minor modification</u>
Section1.3 – Vision and Objectives				
26_1	Michael Meekums, Orpington and District Archaeological Society	ODAS is content with wording in para 1.3.14	Noted.	No modification.
30_2	Mr Hough, Sigma planning services for South East Living group	Not meeting OAN in full means the plan is not positively prepared nor consistent with national policy	See comments on response 30_4 to Draft Policy 1 – Housing Supply	No modification.
38_1	Alice Roberts, CPRE London	Objects to wording of open space vision “ <i>ensure that the Green Belt continues to fulfil its functions</i> ” as this can open the way for removal of Green Belt sites that do not fulfil their functions. Replace with “ <u>protect and enhance the Green Belt so that it can continue to fulfil its function</u> ”	This wording change has already been made to the Objectives in Para 1.3.3 as a result of the previous response received from CPRE.	No modification.
43_1	Sarah Williams, Sustain	Does not require provision of space for community food growing	The objectives for open space and health and wellbeing are considered to adequately represent the wide range of potential beneficial community infrastructure that may be appropriate to include in development opportunities, without needing to list them individually.	No modification.
59_1	Matthew Frith, London Wildlife Trust	Support principles of main vision. Object to phrase “ensure that the Green Belt continues to fulfil its functions”.	The quoted text no longer appears. The Objectives in Para 1.3.3 have been changed as a result of the previous response received from CPRE.	No modification.
66_1	Victoria Barrett NLP for LaSalle Investment Management	LaSalle supports the Vision in the Local Plan stating that “Bromley Town Centre is recognised for its cultural and leisure facilities and vibrant high quality shopping experience,” and the subsequent town centre objectives to “ensure the vitality of Bromley Town Centre, delivering the aims of the Area Action Plan” and “encourage a diverse offer of main town centre uses and complementary residential	Noted.	No modification.

		development.”		
122_12	Sean McGrath, Indigo Planning for Land Improvement Holdings	<p>The overarching Vision and Objectives demonstrate that the Draft Local Plan is not ambitious enough with regards to meeting housing need.</p> <p>The following objectives should be added:</p> <ul style="list-style-type: none"> • Support the delivery of new housing developments in sustainable locations wherever possible to help meet the identified housing needs of the Borough and the wider area, particularly in locations accessible to the identified employment areas. • 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. • Provide an identified supply of housing through site allocations and reserve allocations to ensure the plan will exceed the London Plan minimum housing targets wherever possible. 	Policy 1 – Housing Supply, and its supporting text, outlines the strategy for how the Borough will meet its housing obligations set out in the London Plan. This, in conjunction with the current objectives, is considered adequate to demonstrate how and broadly where, homes will be delivered over the plan period.	No modification.
134_2	Chris Francis, West and Partners for Dylon 2 Ltd	The Vision fails to seek to encourage and enable development which will bring about qualitative improvements and greater accessibility while delivering and meeting the needs for housing, employment and related infrastructure in line with the NPPF and the London Plan and therefore fails to address the requirements of paragraph 182 of the NPPF and accordingly is not sound.	The Vision strikes a necessary balance between addressing future needs of the population and protecting the natural environment, amenity and character. It is considered to reflect para 14 of the NPPF in supporting sustainable development.	No modification.
135_2	Chris Francis, West and Partners for Relta Ltd	As above	As above.	No modification
153_1	Chris Taylor for Orpington Labour Party	The plan is very generalised. There is little detail about how to achieve its limited aims or vision.	Whilst based on a broad vision, the plan contains a clear direction of travel for the Borough’s development. It should be noted in particular that there are a number of spatial policies – Renewal Areas, town centres, the SOLDCs for example, which uniquely reflect the Borough’s places and communities.	No modification.
178_1	Ms Rose Foley	The Plan makes vague claims and statements.	The Draft Local Plan policies aim to create mixed	

		<p>There is a need to be more specific. Why does the Council only allow housing for rent in the Crays and Penge?</p> <p>The Council completely fails to ensure there is good quality open space around new developments. Or, if there are good open spaces, they are behind the locked gates of the numerous gated developments the Council grants permission for.</p> <p>The Borough claims to want to reduce congestion, yet every time you grant planning permission to demolish a single dwelling / pub and replace it with flats, that automatically brings more cars to an area.</p> <p>You do not encourage developers to provide social housing within their developments as encouraged by The Mayor of London and national planning frameworks.</p>	<p>and balanced communities in line with the NPPF however the Council does not have control of the tenure of residential planning applications.</p> <p>The opportunities for the inclusion of open space on development sites depend on a number of factors not least the size of the site and the ongoing management arrangements. Draft Policy 4 – Housing Design, sets out the Council's requirements for high quality development.</p> <p>The Draft Local Plan sets out policies to reduce congestion and include appropriate parking in Chapter 4 – Getting Around.</p> <p>The Council's current and emerging policy is to seek 35% of habitable rooms as affordable housing, This is subject to viability and therefore some scheme provide a smaller proportion and others exceed the target.</p>	
180_2	GP Zambrini	<p>Not everyone has access to the internet. Consultation misses out a substantial tranche of affected citizens. It is doubtful that elderly residents or those not familiar with English will be aware of proposed plans.</p>	<p>The Council has used a variety of electronic and non-electronic methods of consultation during the development of the Local Plan, recognising the needs of the local community. In addition to contacting all those on the database who have requested to be kept informed, each of the five consultations have been publicised through posters, leaflets and press releases.</p> <p>In addition, local residents and interest groups themselves have helped to further spread the word and there have been particular efforts to contact people living in the near vicinity of proposed development sites. Further details of the consultation procedures can be found in the Consultation Statement to be submitted alongside the Plan for Examination.</p>	No modification
190_1	Dr Ellinor Michel	<p>Statement under "Built Heritage 1.3.14 No historic features are considered to be 'at risk' ..." is wrong. The Grade 1 Heritage Asset of the Crystal Palace Dinosaurs are in fact seen as 'vulnerable and declining' and essentially at risk</p>	<p>It is acknowledged that listed structures within the park are currently highlighted on the Historic England "Heritage at Risk Register", however the paragraph quoted is a vision for the future – at which time the objective is to have no features at</p>	No modification

		by Historic England.	risk.	
193_1	Katharine Fletcher, Historic England	<p>Para 1.3.9 - Business, Employment and the Local Economy – we are pleased to see that the objectives for the Biggin Hill SOLDC designation explicitly include having regard to the heritage significance of this important site.</p> <p>Para 1.3.14/15 – Built Heritage – Given that the heritage assets of the borough encompass below ground archaeology and Registered Historic Parks and Gardens we recommend that the title is amended to <i>'Historic environment'</i>. In addition, the opening sentence of 1.3.14 should be amended to read <i>'Our man-made heritage assets, areas of distinctive character, historic parks and gardens, listed buildings, conservation areas and scheduled monuments and undesignated archaeology are protected and enhanced'</i>.</p>	<p>Noted</p> <p>Accepted – although the sentence is supposed to be illustrative not exhaustive.</p>	<p>No modification</p> <p><u>Minor amendment</u></p>
Section 1.4 – Spatial Strategy				
30_3	Mr Hough, Sigma planning services for South East Living group	Failed to amend GB boundary to address exceptional circumstances of unmet housing need. Not positively prepared and contrary to aim of sustainable development. Failed to consider the option of reviewing/ releasing Green Belt.	The NPPF does not require a local authority to review its Green Belt boundary. The Council considers that it can meet the housing requirements set out in the London Plan without using any open space, therefore a Green Belt review has been unnecessary.	No modification.
38_2	Alice Roberts, CPRE London	Disappointed that boroughs which are not densely developed are resorting to taking green space, Objects to loss of Green Belt, MOL and Urban Open Space. The re-designation of sites contradicts the vision for protecting open space. No justification for generalised de-designation. There is no review of the chosen sites which sets out whether they continue to fulfil their Green Belt/ MOL purpose.	The Council has looked at all alternatives before resorting to changes in open space designation to accommodate expanded/ new schools, traveller sites and economic development at Biggin Hill SOLDC. The justification for each of these, including the exceptional circumstances, can be found in the relevant Plan sections and accompanying evidence.	No modification.
79_1	John Escott, Robinson Escott Planning for Crystal Palace Football Club Ltd	Apart from land required for educational purposes, the strategy of the Draft Local Plan is to protect all designated open space regardless of its importance, function or other development and infrastructure needs. The plan must justify this strategy. The evidence base contains no independent, robust and up-to-date assessment of open space needs nor any review of the boundaries. Amend 1.4.2 (the focus of the	The Draft Local Plan includes changes to open space designations for the purposes of education, traveller sites and economic development at Biggin Hill SOLDC. These changes are considered exceptional and no alternatives currently exist. Changes to open space for other uses – including housing and employment land have not been found to be justified as the development needs can be met	No modification.

		Spatial Strategy) to read <i>“protect and enhance the Borough’s those varied open spaces in the Borough identified as important together with the Borough’s and natural environment.”</i>	on previously developed land. The proposed changes to the spatial strategy could be seen as an attempt to “rank” open space and in doing so open the door for unjustified development. See also Section 5.2 – representation 87_3	
87_1	John Escott, Robinson Escott Planning on behalf of Mr P Antill	Apart from land required for educational purposes, the strategy of the Draft Local Plan is to protect all designated open space regardless of its importance, function or other development and infrastructure needs. The plan must justify this strategy. The evidence base contains no independent, robust and up-to-date assessment of open space needs nor any review of the boundaries. Amend 1.4.2 (the focus of the Spatial Strategy) to read <i>“protect and enhance the Borough’s those varied open spaces in the Borough identified as important together with the Borough’s and natural environment.”</i>	See 79_1 above	No modification.
88_2	Lily Mahoney, Sevenoaks District Council	Should significant development be brought forward in Orpington, considerations should be given to the impact on highways, especially along the A21 and M25 Junction 4	Noted.	No modification.
89_1	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	Apart from land required for educational purposes, the strategy of the Draft Local Plan is to protect all designated open space regardless of its importance, function or other development and infrastructure needs. The plan must justify this strategy. The evidence base contains no independent, robust and up-to-date assessment of open space needs nor any review of the boundaries. Amend 1.4.2 (the focus of the Spatial Strategy) to read <i>“protect and enhance the Borough’s those varied open spaces in the Borough identified as important together with the Borough’s and natural environment.”</i>	See 79_1 above	No modification.
91_1	John Escott, Robinson Escott Planning on behalf of Joseph Samuel Corporation	Apart from land required for educational purposes, the strategy of the Draft Local Plan is to protect all designated open space regardless of its importance, function or other development and infrastructure needs. The plan must justify this strategy. The evidence base contains no	See 79_1 above	No modification.

		independent, robust and up-to-date assessment of open space needs nor any review of the boundaries. Amend 1.4.2 (the focus of the Spatial Strategy) to read <i>“protect and enhance the Borough’s <u>those</u> varied open spaces <u>in the Borough identified as important together with the Borough’s and natural environment.</u>”</i>		
92_1	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	Apart from land required for educational purposes, the strategy of the Draft Local Plan is to protect all designated open space regardless of its importance, function or other development and infrastructure needs. The plan must justify this strategy. The evidence base contains no independent, robust and up-to-date assessment of open space needs nor any review of the boundaries. Amend 1.4.2 (the focus of the Spatial Strategy) to read <i>“protect and enhance the Borough’s <u>those</u> varied open spaces <u>in the Borough identified as important together with the Borough’s and natural environment.</u>”</i>	See 79_1 above	No modification.
122_13	Seam McGrath, Indigo Planning for Land Improvement Holdings	The Borough has not undertaken a Sustainability Appraisal or a Green Belt review to ascertain whether or not all of Bromley’s Green Belt/ open spaces fulfil this function. It has failed to have regard to reasonable alternatives.	The Sustainability Appraisal has considered a “higher growth” option, but this was found not to perform as well against environmental criteria. Whilst the NPPF allows local authorities to review their Green Belt during the development of a Local Plan, they are not <i>required</i> to do so. The Council has demonstrated that it can meet the housing targets set out in the London Plan without using any open space, therefore a Green Belt review has not been necessary.	
134_3	Chris Francis, West and Partners for Dylon 2 Ltd	The Draft Plan fails to correctly assess and address Objectively Assessed Housing Needs including failure to address Affordable Housing needs.	See comments on Policy 1 – Housing Supply	No modification
135_3	Chris Francis, West and Partners for Relta Ltd	As above	As above	No modification
151_8	Ann Garrett for Bromley Friends of the Earth	The Local Plan lacks understanding of real “sustainability”.	It is considered that the Draft Local Plan strikes a balance between the three goals of sustainable development – that is, it should achieve economic gains, social improvements <i>and</i> environmental protection and enhancement. The	No modification

			Sustainability Appraisal demonstrates that the broad strategy is likely to have a positive outcome – and that it is the best of reasonable alternative approaches.	
157_3	Senaka Weeraman	There is an uneven distribution of development in borough over plan period. Excessive focus on North West.	The overall spatial strategy is consistent with higher level policy in the London Plan and the NPPF– open space (of which there is a greater proportion in the south and east of the borough) will continue to be protected whilst redevelopment opportunities are focussed in the urban area. The exceptions are the support given to economic growth at Biggin Hill SOLDC and the Cray Valley corridor.	No modification
178_2	Ms Rose Foley	There is vague mention of re-designating open space around schools which should only be for provision of more school places.	A more detailed explanation of the re-designation of open space around schools can be found in Policy 29 – Education Site Allocations. This land is to be retained for education uses only.	No modification
168_2	Dr Elanor Warwick, Clarion Housing Group	There are limited development opportunities therefore it is important to make best use of key sites, particularly Bromley Town Centre, to ensure delivery of sufficient affordable homes. Need to ensure affordable housing is not watered down by viability assessments and consider affordable housing on schemes with fewer than ten units.	Sites in Bromley Town Centre will include affordable housing where viable, A ministerial statement was issued (and subsequently the PPG amended) to state that planning obligations should not be sought on developments of ten units and under.	No modification

Bromley Proposed Submission Draft Local Plan consultation 2016 – Summary of Responses, June 2017.

Chapter 2 - Living in Bromley. Section 2.1 - Housing

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 2.1 - Housing				
25_1	James Stevens, House Builders Federation	<p>Paragraph 2.2.15 of the Local Plan noted (future need of traveller's sites). Reference is made to Policy 2.2E of the London Plan, paragraph 9-007 of the PPG and paragraph 156 of the NPPF relating to the importance developing common approaches to cross-border issues, particularly those that relate to strategic priorities (i.e. homes and jobs). Acknowledge that there has been discussion with other London boroughs but the Plan is not clear on how this has resulted in properly co-ordinated policies for the renewal areas that cross administrative boundaries as set out in paragraph 2.3.10 (to avoid double counting in housing delivery).</p> <p>Importance of Bromley communicating with authorities outside of London (Kent and Sussex) on housing need. The Plan does not provide detail on how it has discharged its duty to co-operate and therefore cannot conclude if the duty has been met. Reference is made to the London Plan and closing the gap between 42,000 and 49,000 homes. Most London boroughs are planning against their benchmark targets but some (Southwark and RBKC) are unable to meet these. Bromley is planning against their benchmark target and should therefore communicate with boroughs in the south-east about the strong likelihood of a higher population (due to London's unmet need).</p> <p>Bromley also needs to communicate with the south-eastern boroughs that the GLA's household formation estimate (as set out in the GLA's SHMA) are lower than the DCLG's (2011 Interim Household Projections) and has an impact on migration assumptions. Bromley needs to</p>	<p>The London Plan 2016 addresses many issues that would otherwise by Objectively Assessed Need or Duty to Co-operate issues. Distribution of housing amongst boroughs is shown in London Plan Policy 3.3 Increasing Housing Supply (and Table 3.1). London Plan Policy 1.1 Delivering the strategic vision and objectives of London states that growth will take place within the current boundaries of Greater London and without encroaching in the Green Belt or on London's protected open spaces. Release of Green Belt or protected open space should not be necessary to achieve compliance with Policy 3.3 of the London Plan.</p> <p>The London Plan 2016 has taken into account the London SHMA and SHLAA in arriving at a housing supply distribution and total in London and the boroughs. In addition to this the south-east London boroughs completed a sub-regional SHMA that shows need is met in the sub-region.</p> <p>Bromley forms part of the South East London Housing Partnership and works closely with the other boroughs in this partnership and with other London boroughs to deliver the London Plan targets.</p> <p>London Plan is due to be reviewed in the near future and that review is due to address changes in housing need and supply.</p> <p>Bromley has met its DTC with London boroughs, and with its neighbours outside in Kent and Surrey. This is set out in its Duty to Co-operate Statement.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		demonstrate it has communicated with south-eastern boroughs on this matter.		
67_2	Nick Taylor Carter Jonas for Beckenham Trustees	To make the Plan sound suggests a draft policy on the Private Rented Sector in line with GLA draft and adopted supplementary planning guidance.	<p>Policy 3.8 Housing Choice specifies in clause a1 that LDF preparation and planning decisions boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector in addressing housing needs and increasing housing delivery. Paragraphs 3.54 and 3.54B advise that the planning system should complement policies in the London Housing Strategy to support growth in private renting where this will result in well managed, good quality accommodation, mixed and balanced communities and sustainable neighbourhoods.</p> <p>So far as necessary the issue is addressed in the London Plan and London supplementary guidance.</p>	No modification.
168_1	Dr Elanor Warwick Clarion Housing Group	Support the proposal to offer decent homes to meet local need based on adequate assessment of on-going housing need.	Noted.	No modification
168_3	Dr Elanor Warwick Clarion Housing Group	<p>Welcome consideration of a wide range of options to facilitate the provision of new build and refurbished homes. Welcome the proposed target of 641 p.a. as minimum in line with 2016 London Plan. Going into current round of revisions to London Plan conscious there is likely to be pressure on targets. Suggests any delivery shortfall each year will become even more critical.</p> <p>Aware of ongoing high demand for housing in all areas of Bromley. Earlier research undertaken for Affinity Sutton by the Cambridge Centre for Housing Policy (CCHPR) in 2011 showed that there 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%. Overall housing provision is being distorted by products such as Starter</p>	<p>Noted.</p> <p>Comments on high level of affordable need are noted and reflected within the supporting text of Draft Policy 2. As specified in paragraph 2.1.32 of the Draft Local Plan the Council is currently awaiting further government guidance on the application of the starter homes policy. Comments on the suitability of starter homes to meet genuine need are noted.</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Homes which may only help a small proportion of those aspiring to home ownership and could be unaffordable to some people.		
178_3	Ms Rose Foley	Bromley do not comply with meeting needs of present and future generations housing. Bromley does not allow social housing in some parts of the Borough – does not support strong vibrant communities and creates enclaves without social interaction across different parts of community.	Draft Policy 2 Affordable Housing does not restrict affordable housing in specific parts of the Borough. As specified in Draft Policy 2 where development schemes propose not to include affordable housing on site viability evidence would need to be submitted to the Council to demonstrate why provision is not possible. The Draft Local Plan includes a range of policies to ensure development supports existing and future communities (Vision and Objectives and Draft Policies 4 Design, 20 Community Facilities, 21 Opportunities for Community Facilities, 22 Social Infrastructure in New Developments, 26 Health and Wellbeing and 125 Delivery and Implementation of the Local Plan.	No modification
Draft Policy 1 - Housing Supply				
1_2	Adrian Lawrence	<p>Plan preparation received bias input from Members creating anti-development set of policies. No engagement with pro-development community including local house builders and developers. Plan preparation ignored we are in midst of housing crisis and offers little / no pro-activeness to address housing need. Plan does not demonstrate soundness in terms of meeting housing need of right type of homes in the right locations. Over reliance on town centre development typically of high rise nature. Demonstrates a numbers game in the name of protecting green belt boundaries that have not been scrutinised for housing supply.</p> <p>No evidence of inter borough cooperation (distinct lack of development on borough boundaries).</p>	<p>Development community and house builders including the HBF have been engaged throughout the Local Plan process with many responding to the many stages of consultation including the Draft Local Plan.</p> <p>See also response to 25_1 above.</p> <p>Bromley has met its DTC with details provided in its DtC Statement. (Development and planning applications include areas adjoining other boroughs, except where this comprises Green Belt in line with Government and London Plan policy).</p>	No modification.
25_2	James Stevens, House Builders Federation	The Council has done the minimum necessary to be in conformity with London Plan. Reference is made to the London Plan setting out its capacity figure of 42,000 dwellings per annum (dpa) and its overall need figure of 49,000 dpa if delivered up to 2036 and 62,000 dpa if delivered up to 2026. The	Paragraphs 1.3.7 (Vision and Objectives), 1.4.3 – 1.4.6 (Spatial Strategy) Draft Policy 1 and Appendix 10.1 set out some of the context for future housing supply in the borough. Paragraph 2.1.15 makes reference to the level of housing need annually in the borough that ranges from	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>figures set out in Table 3.1 of the London Plan are minimum. Paragraph 3.19 of the London Plan specifies benchmark targets should be augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. Bromley has not demonstrated it has done enough to contribute to closing the gap that exists in London. Not positive planning reflecting the spirit of the NPPF to boost significantly the supply of housing.</p> <p>Paragraphs 1.1.7 and 1.1.8 of the GLA Housing SPG require boroughs to ensure local application of Policy 3.3 takes account of housing requirements at a regional, sub-regional and local level. Seeking to meet FOAN in the housing market areas as far as is consistent with the Framework. Consider latest SHMA (2014) is dated and was not included in evidence base documents. Dwelling requirement figure for Bromley in the SHMA is 1320 per annum, 2014 DCLG Household Projections show 1,800 households per annum. Difference between benchmark capacity figure and household projection illustrates importance of London boroughs doing all they can to help meet need. Differences need to be planned for in terms of the potential number of people moving outside of London.</p> <p><u>Housing Land supply and capacity</u> Table 1 of the Local Plan shows 7259 homes for period 2015 – 2025. Does the Council consider plan requirement for 726 dpa? Note there is an increase, but it is a marginal increase above minimum required. Represents just 85 homes per year to help close the gap. Over 15 years potential supply is 1030 homes above minimum number required (69 dwellings per annum to help close the gap). Many local authorities apply a non-implementation allowance (including Camden, 10%). If applied this would reduce overall figure by 641 units. Unclear on whether a 5% or 20% buffer would be applied to the housing</p>	<p>1320 dpa in the 2014 sub-regional SHMA to 1840 dpa (short term variant) as published in the GLA 2014 household projections. Over the 15 year plan period Appendix 10.1 shows that approximately 10645 units could be developed against a requirement target, as set out in the London Plan, of 9615 units.</p> <p>The London Plan review expected in 2019 is due to consider housing land provision.</p> <p>As set out above the Draft Local Plan specifies that the borough has a level of need significantly exceeding its requirement target. Through the local plan process suitable draft allocations for residential development have been identified to contribute to meeting the requirement figure in addition to overall need. Additional sources of supply include; large sites which have acquired planning permission, a conservative small site allowance, opportunity sites included in the Bromley Town Centre Area Action Plan, broad locations and small allowances for vacant units and prior approvals.</p> <p>The minimum requirement figure is set out in Draft Policy 1 as 641 dwellings per annum as opposed to the 726 figure made reference to. Any units identified above the minimum requirement figure will contribute to closing the gap between supply and need. The Council's latest Five Year Housing Supply Paper (November 2016) sets out the appropriate buffer of 5% for the borough. There is therefore not a need to apply a 20% buffer or other similar allowances such as non-implementation.</p> <p>The Council's position on lapse rates is set out in the November 2016 5YHLS Paper. Paragraph 2.7 specifies that:</p> <p>Bromley's approach is consistent with the NPPF</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>trajectory and if there is any shortfall in housing delivery.</p> <p><u>Windfall and prior approval allowance</u> According to the GLA SHLAA annual figure for contributions from small windfall sites is 352 units. Advisable to treat any windfall supply from prior approvals as part of the small sites allowance. Concern that over half of the Boroughs supply will come from small site allowance (3520 over first 10 years, paragraph 2.1.7) as opposed to specific deliverable sites. Reference made to paragraph 2.1.21 bullet two, if there are other policy compliant large sites why has the Council not already identified them? What would the triggers be to bring such sites forward (i.e. low rate of small windfall sites or low overall level of completion)? Consider incumbent upon Bromley to review its land to identify more tangible sites to meet annually rising need.</p>	<p>and is conformity with the London Plan.</p> <p>Table 1 and Appendix 10.1 includes a small site allowance of 3652 units over 15 years which is considered conservative in comparison to the small site allowance set out for the borough (3520 units) over 10 years from the GLA 2013 SHLAA. The prior approval allowance has been separated out as this element of supply was not part of the overall small site allowance data used in the GLA's 2013 SHLAA to calculate small site targets for the boroughs. With regard to paragraph 2.1.21 reference is made to sites listed in the trajectory that may be able to be moved forward to assist delivery rates in conjunction with landowners and developers.</p>	
30_4	Mr Hough, Sigma planning services for South East Living group	<p>Policy is not positively prepared (only meets minimum provision figure), Not justified (not considered against reasonable alternatives based on evidence), Not effective (questions deliverability of number of proposed allocations, effective joint working on cross-boundary strategic priorities not arranged), Strategy does not deliver level of housing for OAN in full as required by paragraph 47 NPPF. Evidence, notably call for sites demonstrates this could be achieved, no balanced assessment of the impacts of devt. on this scale to justify not meeting OAN.</p> <p><u>Housing requirement</u> The Policy sets out a total housing requirement figure of 6410. The OAN figure for the borough is 1320 as set out in the 2014 SHMA. The Plan does not attempt to assess the Borough's capability of meeting more than the minimum level of provision. The GLA 2013 SHLAA upon which the requirement figure is based does not; provide a comprehensive list of individual sites, publish</p>	<p>See above in part for minimum provision figure. Site Assessments 2015 Housing and Mixed Use consultation document sets out the process by which sites were considered following a call for sites exercise in 2014 to assist in the identification of further sites for residential purposes. With regard to the allocation of sites for development within the Green Belt (GB) paragraphs 1.4.16 – 1.4.18 of the Draft Local Plan set out that the Council is seeking to amend GB boundaries where there are exceptional circumstances and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere (Appendix 10.1 demonstrates residential development can be accommodated on non-designated sites).</p> <p>The 2014 SHMA for the South East London Housing Market area shows that across the market area the scale of need can be addressed through the boroughs' London Plan targets. As</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>details of sites below 0.25ha, allow for amendments to existing policies such as Green Belt, the assessment was not policy neutral. It is up to LBB to test the option of Green Belt release, to assist in looking at the potential to meet FOAN. A figure considerable higher than the London Plan requirement figure would not conflict with the London Plan. Questions ability of requirement figure to meet affordable needs of the borough (1404 units per annum, 2014 SHMA).</p>	<p>outlined earlier the Council is seeking to exceed the 641 minimum target with a figure of 10645 in the housing trajectory.</p> <p>Whilst paragraph 47 of the NPPF specifies that LPAs should use their evidence base to ensure the Local Plan meets the full objectively assessed needs for the market and affordable housing in the housing market, this should be consistent with the policies set out in the Framework. This advice is elaborated upon in paragraph 3-044 of the PPG. In addition to this paragraph 3-045 of the PPG sets out that assessing need is just the first stage in developing a Local Plan. Once need has been assessed the LPA should prepare a SHLAA to establish realistic assumptions about land for housing delivery. In doing so they should take account of any constraints such as GB which indicate that development should be restricted and which may restrain the ability of an authority to meet its need. Paragraph 3-034 states that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute “very special circumstances” justifying inappropriate development on a site within the Green Belt. The GLA 2013 SHLAA and the Council’s assessment of further sites (following a call for sites in February 2014) accords with the above advice.</p> <p>The question of Green Belt release is addressed by the London Plan. The London Plan does not propose release of Green Belt to meet Policy 3.3.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
30_5	Mr Hough, Sigma planning services for South East Living group	<p>Delivery of a number of sites proposed to be allocated under Draft Policy 1 is questionable. In particular:</p> <p><u>Bromley Civic Centre</u> (Council need to demonstrate how current position has changed to suggest current proposal has necessary degree of certainty to be considered deliverable when previous proposals have not been implemented).</p> <p><u>Land adjacent to Bromley North</u> (Another longstanding proposal consistently failed to come forward. There are ownership issues preventing a comprehensive development not resolved).</p> <p><u>Hill Car Park</u> (Practicality of providing 150 unit scheme whilst retaining car park capacity has not been adequately demonstrated).</p> <p><u>Bromley Valley Gym</u> (Practicality of providing 200 new dwellings to meet quality standards and avoid loss of sports facilities not adequately demonstrated).</p> <p><u>West of Bromley High Street</u> (Different ownerships, questionable whether or not it can be assembled in Plan period).</p> <p>History shows borough has not consistently maintained an adequate supply of housing and unplanned releases of Green Belt/MOL have been allowed on appeal.</p> <p><u>Housing Mix</u> – allocations substantially comprised of high density flatted schemes (1/2 bedroom). Proposed housing is unbalanced and will not deliver a wide choice of high quality houses or create inclusive and mixed communities, contrary to paragraph 50 NPPF.</p> <p><u>Site Mix</u> – emphasis on brownfield sites involves potential loss of existing or potential urban uses (employment, car parking, sports/recreation) whilst increasing demand for them. Reliance on large sites of 100 units creates lack of choice for development industry. There are few existing approvals/allocations for 20-50 units.</p> <p><u>Affordable housing</u> – reliance on urban redevelopment will restrict delivery of affordable</p>	<p>For individual sites listed see site specific responses.</p> <p>Paragraph 2.1.16 sets out the level of need identified in the 2014 sub-regional SHMA by unit size. It also specifies that larger development proposals of 5+ units should provide a mix of unit sizes and would be considered on a case by case basis. 73% of need up to 2031 is identified for 1 and 2 bedroom units (2014 sub-regional SHMA).</p> <p>Proposals would be considered on a case by case basis against all relevant policies in the Plan including those that assess the impact of the loss of an existing use. Appendix 10.1 includes a range of sites accommodating a range of unit numbers.</p> <p>Relevant proposals will need to address Draft Policy 2. Issues of viability will be taken into</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>housing overwhelmingly required (high existing use values, abnormal development costs, demolition, decontamination, construction costs etc.)</p> <p><u>Alternative Strategies</u> – Sustainability appraisal only appraised 2 housing quantum figures, 641 and 750 dpa. Strategy of meeting OAN was not tested including consideration of Green Belt release. Makes the Plan unsound. Disputes SA that states alterations to GB should be made through the London Plan (6.3.9 – 6.3.30) and exceptional circumstances to justify release of Green Belt did not exist from housing needs alone. Does not conform with paragraphs 84 and 85 of the NPPF. GLA 2013 SHLAA excluded protected land including GB and left individual boroughs to review boundaries.</p> <p><u>Omission sites</u> The following omission sites should be considered as housing sites to help meet OAN or as replacements for unsuitable sites in Draft Local Plan (site assessments included). Land north side of Cockmanning Lane St Mary Cray Orpington BR5 4PY Lone Barn Farm East Hall Road Orpington BR5 4EZ</p>	<p>account on a case by case basis.</p> <p>See above regarding Green Belt consideration.</p> <p>The sustainability appraisal looked at the strategic option of 641 homes per annum based on relevant regional evidence. The site assessments were carried out within specific parameters. This is set out in paragraphs 1.4.16 – 1.4.18 of the Draft Local Plan.</p> <p>Sites within Green Belt – not recommended for consideration due to existing designation.</p>	
34_1	Emma Talbot London Borough of Lewisham	Note whilst the annual target of 641 falls short of objectively assessed need (2014 SHMA) of 1320 units the combined SE London sub-region annual capacity of 7893 units is sufficient to meet annual requirement of 7188 units. Once we have completed our SHLAA process welcome the opportunity to work collaboratively to discuss objectively assessed need across SE London sub-region as part of our regular meetings for SE London DtC Group.	Noted.	No modification.
36_1	Thomas Leigh, Colliers, for	New proposed residential site at Tesco site		No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
	Aberdeen Asset Management	<p>Homesdale Road. 100 units.</p> <p>On the whole the Council has taken into account all of the relevant issues and reasonable approaches to identify a suitable strategy / policy approach. Support general approach of Draft Policy 1 as it adopts an approach which seeks to meet local needs and follows the same principles as paragraph 14 of the NPPF. Seeks to promote the delivery of sustainable development which is welcomed. However Policy should be amended to include allocation of additional sites for residential use. This will ensure a suitable supply of housing sites is provided and provides a more sustainable plan-led approach to delivering growth when compared with relying on development to come forward in broad locations or on windfalls.</p> <p>Policy confirms the Council recognise requirement to deliver OAN (641 dpa). Policy identifies 10,645 new dwellings up to 2030. Paragraph 3.19 of the London Plan states boroughs should use their housing supply targets as a minima augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. Essential the Council seek to maximise opportunities to deliver residential devt. in suitable locations. Consider significant weight should be attached to significantly boosting housing supply where sustainable to do so and released through plan-led strategic review.</p> <p>Consider Tesco site at Homesdale Road is suitable for residential use, would deliver a significant contribution to housing supply in the borough and should be included as a residential allocation.</p> <p><u>Delivery of approx. 100 dwellings;</u> <u>Years 10-15;</u> <u>Without need for major infrastructure;</u> <u>Sole ownership of Aberdeen Asset Management.</u></p>	<p>Support for Draft Policy welcomed.</p> <p>Agreed that housing supply target is minimum as set out in Draft Policy 1 and opportunities should be maximised to deliver residential development in suitable locations (including significantly boosting housing supply where sustainable to do so).</p> <p>The Tesco site at Homesdale Road is a previously developed site adjacent to Site 4 Draft Allocation (Gas holder site) at Homesdale Road Bickley. The site is not designated as a retail frontage, neighbourhood centre or local parade and the current designation of Business Area is not being carried forward into the Draft Local Plan.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Adjacent to Gas Holder site identified as residential led allocation by Draft Policy 1 of the draft local plan. Support allocation of adjacent gas holder site. However important to ensure a sufficient range of sites allocated to provide steady supply of new housing and ensure plan-led approach to development. Proposed site would complement Council's aspirations to deliver housing on gas holder site. Tesco site is not located within designated retail centre or protected by planning policy. Surrounding area is predominantly residential in character.</p>	<p>Acknowledge that the site could complement the adjoining draft allocation if residential use was appropriate in principle, both being previously developed sites in a sustainable location. Housing trajectory includes 200 units in broad locations 'Changing Retail Patterns' which could cover potential sites of this type.</p>	
40_1	Lucy Bird, St William Homes	<p>St William has an interest in emerging Local Plan as the Joint Venture (Berkeley Group and National Grid Property Holdings) plans to regenerate the former Beckenham Gas Works Land South of Churchfields Road. The partnership has been established to lead regeneration of decommissioned and redundant gasholder sites across London and the south-east. Redevelopment of site provides opportunity to contribute to regeneration of Birbeck / Elmers End area to deliver new homes to help the borough meet its housing targets. Call for sites submitted to GLA (June 2016) indicating site could accommodate 35 net additional homes minimum. Omission of site for housing has been an oversight given differing timescales of Joint Venture process and Local Plan making process.</p> <p>NPPF sets out core planning principle that local planning policies should encourage effective and efficient reuse of land by re-using PDL that is not of high environmental value. Paragraph 3.14A of the London Plan makes it clear that approach to housing supply should take account of London's pressing need housing need and limited land availability. Accessible location and brownfield characteristics of former Beckenham gas works site should be allocated for housing.</p>	<p>The site was considered in the Council's Site Assessments 2015 Housing and Mixed Use. The site was not recommended for allocation for residential development as it was considered unsuitable due to its siting adjacent to the waste transfer station that shares an access with the proposed site. The siting of the waste transfer station is not proposed to change during the lifetime of the Plan.</p> <p>A sub-station is adjacent to the site to the eastern boundary.</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
41_2	David Graham, Daniel Watney for Prime Place	<p>LB Bromley does not have an up-to-date SHLAA or SHMA to determine their full OAN as the evidence produced in support of the FALP is outdated. Required to endeavour to provide significantly more than the requirement figure of 641 in anticipation of the LP review (expected 2019). The review is expected to demonstrate a requirement for significantly more housing in London having regard to under delivery in the 18 months since the FALP was adopted. Current housing target for Bromley is considered inadequate in the context of the FALP 2014 (increases figure for Bromley to 800 dpa or 1000dpa)</p> <p>London boroughs including Croydon and Camden have increased their requirement figures demonstrating Council's proactively addressing housing need.</p> <p>Housing trajectory shows 3686 units across the five year period against a target of 3365 units. 5YHLS has not been demonstrated in relation to the small windfall allowance. 626 units over the next five years is unrealistic in light of evidence presented to the FALP. The approach taken on the small site allowance conflicts with paragraph 48 of the NPPF. Reference is made to the Inspector's comments in the appeal referenced below in relation to the small site methodology used in the June 2015 5YHLS Paper.</p> <p>Appeal (APP/G5180/W/16/3144248) disputed units at Sundridge Park Manor and the former Town Hall, 47 units should therefore be removed.</p>	<p>See above representations including 25_1 in relation to level of housing need for the borough. For clarification the London Plan is under review and the housing target for the borough is likely to change over the next 18 months. As part of the review the capacity of the borough will be taken into account systematically as opposed to a "sharing out" the difference between the current London Plan requirement targets (42,000 dpa) and overall need (49,000 dpa – 62,000 dpa) between all of the London boroughs. The Draft Local Plan sets out in paragraph 2.0.3 that the London Plan is subject to a review in addition to the BTCAAP and the results of these could impact upon housing supply in the borough.</p> <p>Through the local plan process suitable draft allocations for residential development have been identified to contribute to meeting the requirement figure in addition to overall need. Additional sources of supply include; large sites which have acquired planning permission, a conservative small site allowance, opportunity sites included in the Bromley Town Centre Area Action Plan, broad locations and small allowances for vacant units and prior approvals.</p> <p>The small site windfall allowance set out in Appendix 10.1 has been calculated based on the most recent small site completions over an eight year period. It is evident that for the monitoring year 16/17 up to January 2017 147 units on small sites have been completed (excluding respa completion). Further, more detailed monitoring is carried out during the early summer to account for all completions during the financial year. The conservative figure included in the trajectory is seen to be a realistic figure over 5 years.</p> <p>The trajectory does not include Sundridge Park Manor but instead Sundridge Park Management Centre. The appeal made reference to an</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Housing shortfall exists from 1996 amounting to 1063 units. Land adjacent to Bromley North should be maximised to account for this shortfall.</p> <p>Question the housing trajectory to deliver the expected 2527 residential units in Bromley Town Centre (Opportunity Area) with a further 250 provided through town centre broad locations. Includes deliverability; of HG Wells Centre (most recent scheme refused), broad location figure of 250 units for BTC and the main concern of Site 10 West of Bromley High Street.</p> <p>Having assessed and monitored progress on delivering the site, do not consider site (10) to be deliverable over the plan period and question deliverability within any reasonable timeframe. Council are over-dependent on the delivery of this one site (cite also considerable number of residential and commercial freeholders and long leaseholders and high occupancy rates). Further evidence should be provided to demonstrate, from a spatial perspective, 1230 units could be delivered. Removal of questionable sites including Site 10 results in 1195 units for BTC.</p> <p>Suggest increasing number of units on Site 2 Land adjacent to Bromley North Station to 740 units from 525 units.</p>	<p>increase in units attributed to the town hall during the preparation of evidence based on the June 2015 5YHLS Paper. The trajectory relates to the most recent planning permission granted for the site which is seen to be acceptable for the updated November 2016 Paper.</p> <p>See responses to Site Allocations.</p> <p>It is considered that HG Wells (52 units) could be deliverable within Years 2-6 of the Plan (appeal allowed 13.8.2015) and 250 units (large sites) from Years 6 – 15 could be developable.</p> <p>Allocation of 525 units at Land adjacent to Bromley North Station is an appropriate balance between design constraints on the site including transport facilities, impact on neighbours and development viability.</p>	
46_1	Holly Chapman, Hume Planning	Proposes site Land at Home Farm Sandy Lane Orpington BR5 3HY. Site area of 1.2 ha with central brown-field area to the south side of Sandy	<p>Site is designated within the Green Belt.</p> <p>With regard to the allocation of sites for</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Lane. Comprises a mix of residential and commercial uses. Requests site is assessed as part of SHLAA process and considered as future residential allocation in the Local Plan.	development within the Green Belt (GB) paragraphs 1.4.16 – 1.4.18 of the Draft Local Plan set out that the Council is seeking to amend GB boundaries where there are exceptional circumstances and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere (Appendix 10.1 demonstrates residential development can be accommodated on non-designated sites).	
50_1	David Phillips, Strutt & Parker, Iris Estates Ltd	<p>Related to rejected housing site Land north of Warren Road (19ha). Refers to NPPF, NPPG, London Plan, South-East London SHMA, London-wide SHLAA, 5YHLS. Objected to consultation in February 2014.</p> <p><u>Housing Supply</u> Council's position on housing numbers only delivers half of the total annual requirement of 1320 homes per annum and therefore a strong objection remains. Inconsistent with the NPPF in terms of meeting objectively assessed need. Delivery of 641 homes per annum is not based on a robust credible evidence base. Draft Policy 1 is not the most appropriate approach to delivering the vision and objectives for homes. Support a higher target that seeks to significantly exceed current LP targets for 2016 – 2026.</p> <p><u>Housing Targets</u> Too much weight to protection of local character and context whilst maintaining the Green Belt. NPPF's primary objective is a presumption in favour of sustainable development (para 14). LPA should seek opportunities to meet development needs of their area and meet OANs with sufficient flexibility to adapt to rapid change. Reference is also made to the requirements of paras 47 and 48 of the NPPF in relation to 5YHLS. London Plan (Policy 3.3Da and Policy 3.3E) states boroughs should draw on housing benchmarks augmented where possible with extra housing capacity to close the gap between need and supply. The London Plan target is a minimum but to meet requirements of NPPF the Council must identify sufficient housing to meet OAN plus a 5% buffer</p>	<p>See above responses in relation to housing need including 25_1 including the reference to London Plan policy on Green Belt encroachment.</p> <p>See 30_4 response in relation to the NPPF and NPPG's advice on housing and protected designations.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>(1356 annually including 5% buffer, 20,340 including buffer over 15 years). Council has failed to demonstrate why it is not seeking to achieve / exceed minimum housing target which is not sound. Figures set out in the SHMA should be reflected within the policy target.</p> <p><u>Housing Land Supply</u> Current understanding of housing requirement to 2025: Target 2015 – 2030 of 20,340 5YHLS (Nov 2016) – 3686 units (BTCAPP – 2453, Large sites with pp 244 units, Small sites with pp 52 units, Small site allowance 3026 units, Vacant units 200 units, Broad locations 965 units, Small sites started 19 units – reference made to a residual requirement for 5 years of 3094 units and for 15 years 9695 units).</p> <p>Reference is made to the Inspector’s findings into the UDP (2006) examination that asked the Council to correct underperformance in housing delivery (that could include looking at GB and MOL). The Inspector concluded Iris Estates land interest north of Warren Road was suitable for Green Belt release. Although not supported by the Council demonstrates a significant number of GB sites could be released / considered for release without undermining its status. Release</p>	<p><u>Clarification on supply components as set out in Draft Local Plan.</u></p> <p>Minimum housing requirement of 641 dpa (9615 over 15 years) with the London Plan requirement to achieve and exceed the relevant London Plan target.</p> <p>Five year housing land supply position (2016/17 – 2020/21) = 3686 units.</p> <p><u>Trajectory components</u> Allocations and BTCAPP sites = 2849 units Large sites with planning permission/commenced = 1400 units Small sites with planning permission/commenced = 196 units Small site allowance = 3652 units Prior approval units = 338 units Vacant unit allowance = 280 units Prior approval allowance = 200 units Broad locations = 965 units 2015/16 completions = 670 units Small sites started = 95 units</p> <p>All sites presented to the Council have been assessed in accordance with paragraphs 1.4.16 – 1.4.18 of the Draft Local Plan.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>of GB sites could help accommodate a target that exceeds the 641 figure and have already been identified as appropriate for release by a previous Local Plan Inspector. Only modest releases of land are proposed by the Council.</p> <p>Suggested site considered to be highly sustainable location that could facilitate delivery of housing – to assist in making housing objectives sound. Broad objectives of directing growth as set out in Spatial Strategy (para 1.4) supported but without identifying GB to deliver housing consider a robust and reliable evidence base has not been demonstrated to deliver vision and objectives. Consider the Council do not have sufficient PDL to meet OAN targets. Council should not rule out urban extensions.</p> <p>Council should assess housing sites against the following: Availability of PDL (and empty / under-used buildings); Location and access to shops, jobs and services by modes other than the car, potential to improve accessibility; Capacity of existing infrastructure (transport, sewerage, other utilities, social infrastructure); Cost of adding further infrastructure; Ability to build communities, support new physical and social infrastructure; Physical and environmental constraints (contamination, flood risk, climate change impacts).</p> <p>Smaller sites and TC sites are not always able to deliver appropriate mix of housing to meet local needs (i.e. families).</p> <p>Important to base policies on thorough understanding of needs and the opportunities,</p>	<p>Considered that the criteria used to assess sites (as explained in the Site Assessments 2015 Housing and Mixed Use consultation document) were relevant and suitable (including advice set out on land availability assessments within the PPG – paras 3-013 – 3-017).</p> <p>Paragraph 2.1.16 sets out the likely mixture of unit sizes by percentage as set out in the 2014 SHMA. It also specifies that schemes of 5+ units should provide a mix of unit sizes (to take account of the sizes of units required) and will be considered on a case by case basis. Additionally there is a suitable mix of sites included in the Draft Local Plan housing trajectory.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>constraints that need to be taken into account. Site in question would assist in meeting OAN for the borough – detailed description is then set out assessing the site and setting out proposed residential use. Detailed reference is made to previous submission to the UDP Inquiry and their conclusions.</p> <p>Propose changes to Draft Policy 1 to reflect need to make provision for 1356 additional homes per annum and make reference to Warren Road as suitable for residential development (includes amending Appendix 10.1, Appendix 10.2, Spatial Strategy map para 1.4.2, paras 1.4.12 – 1.4.15 to refer to 1356 homes per annum, GB boundary amendments to 1.4.18 and 1.2.26 (appendices including maps of site allocations / designations maps 1 and 2).</p>	<p>See above responses in relation to housing need.</p>	
53_1	Steve Dennington, London Borough of Croydon	<p><u>Housing numbers</u> Croydon has unmet need in the region of 12,000 homes 2016-2036 as expressed in Local Plan agreed for submission to SoS. Unmet need has been part of dialogue between our 2 authorities (raised in particular 05/11/2015). Surprising therefore that Draft Policy 1 only seeks to meet minimum target (especially as Council's should seek to exceed minimum target). Doesn't reflect trajectory that shows a higher target is achievable. Policy does not demonstrate how OAN is being met and SHMA was not available on the Council's website.</p> <p>No dialogue or communication with Bromley regarding its OAN or Croydon Council's letter regarding unmet need for new homes in LB of Croydon. Croydon invited LB Bromley to inform methodology and findings of their SHMA.</p> <p>Wording constrains future housing supply ("where appropriate" and "suitable") with consequential</p>	<p>Draft Policy 1 makes reference to the requirement target of 641 being a minimum figure. The trajectory demonstrates that the Council have sought to achieve and exceed the target figure (9615 requirement versus 10645 identified within Housing Trajectory, Appendix 10.1 of the Draft Local Plan). See also responses to housing need above including 25_1.</p> <p>Bromley has engaged with Croydon on a regular basis through London wide, South London and one to one meetings. Both boroughs individually cannot meet their identified need, and both have asked each other at DTC meetings if each can help with agreement that as they cannot accommodate their own need they cannot help address another borough's need. Bromley forms part of the SE London Housing Market and</p>	<p>Minor amendment to clause c removing '<u>where appropriate</u>'.</p>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>impacts on Croydon. Need for LBB to demonstrate policy does not unduly constrain supply of new homes, is justified and positively prepared. LB Croydon would welcome a similar approach to that set out in the draft Croydon Local Plan: Strategic Policies – Partial Review and Draft Croydon Local Plan: Detailed Policies and Proposals (sustainable growth in the suburbs approach). Draft Local Plan would benefit from setting out OAN need, considering unmet housing need from Croydon, remove instances of “where appropriate” and “suitable” from Draft Policy 1 or use supporting text to show where is appropriate or when is suitable.</p>	<p>updated its SHMA in 2014 with the other four boroughs, which showed that the scale of need can be accommodated across the SELHP area. Croydon is not considered part of this housing market area, having previously formed part of the South West London Housing Market with the boroughs to its north and west. On this basis it was not considered necessary for Bromley to have input over and above the recently updated SHMA.</p> <p>Considered that the policy does not unduly restrain future housing development.</p> <p>Reference to ‘where appropriate’ relates to clause c and the development of housing within Renewal Areas. Other clauses are not caveated and it is considered that the wording ‘where appropriate’ does not strengthen the policy. With regard to clause f and the inclusion of ‘in suitable locations’ this wording is appropriate as there are locations where a mixture of uses might not be appropriate (for example mixed uses may be more suitable in more accessible locations and/or a mix of uses may not always be suitable for some residential areas).</p>	
54_2	Steven Butterworth, NLP for Tesco	<p>Suggests additional site Land to the rear of Tesco Edgington Way previously not designated through the 2015 Site Assessment process (within SIL).</p> <p>Currently pressing need for more homes in Bromley and throughout London to help boost significantly the supply of housing. LB Bromley needs to demonstrate it has sought to boost supply significantly, using housing supply requirements as minima, augmented with</p>	<p>See above representations on housing need including 25_1.</p> <p>See response to representations on the SIL within the Working in Bromley chapter.</p> <p>Most recent 5YHLS position set out in November</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>additional capacity to reduce the gap between need and supply. Past completion rates indicate additional residential sites will be required. Absence of 5YHLS and reliance on windfalls indicates need for additional sites (Oct 2015).</p>	<p>2016 Paper that specifies a 5YHLS can be demonstrated. A significant portion of the boroughs requirement target comes from small site windfalls. The allowance has been re-calculated following the appeal decision for Land to the rear of Dylon (August 2016) and is considered to be realistic.</p>	
60_1	Dr Malcolm Hockaday, NLP for Development Securities PLC	<p>Propose housing site (cited as PDL) for 450 – 500 mixed scale and character / sports/recreation/public open space - World of Golf, Sidcup Bypass.</p> <p>Reasonable alternatives have not been considered and tested.</p> <p>Draft Local Plan states allocations and broad locations will assist the borough in meeting and exceeding its housing supply. Adopted housing supply target drawn from London Plan target rather than larger OAN target set out in SE London SHMA (1320 dpa.). Para. 47 NPPF states to boost significantly supply of housing LPAs should ensure Plan meets OAN for housing. Includes identifying key sites critical to delivery of housing strategy over the Plan period. Additionally identify and update annually supply of specific deliverable sites sufficient to provide 5 years' worth of housing against housing requirements. Need to go beyond level of growth</p>	<p>Site Assessments 2015 Housing and Mixed Use consultation document sets out the process by which sites were considered following a call for sites exercise in 2014 to assist in the identification of further sites for residential purposes. With regard to the allocation of sites for development within the Green Belt (GB) paragraphs 1.4.16 – 1.4.18 of the DRAFT LOCAL PLAN set out that the Council is seeking to amend GB boundaries where there are exceptional circumstances and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere (Appendix 10.1 demonstrates residential development can be accommodated on non-designated sites).</p> <p>See above responses in relation to borough housing need including 25_1.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>in DLP to ensure needs of borough are met and take into account London Plan recognition of only achieving undersupply.</p> <p>Question increase of units at Bromley North (cited in 2015 Site Assessment as 250 units) without evidence and justification. Additional sites included (Site 10 West of Bromley High Street and land at Bromley South, 1230 units). No explanation to why it was not suitable 12 months ago but is considered suitable now. Cannot be considered justified and therefore unsound.</p> <p>There are opportunities to adopt additional growth options (i.e. urban extensions/0 to meet possible shortfall in target and better meet OAN. They can provide sustainable devt. and a significant number of homes. Planned release of parts of GB will ensure devt. is integrated and meets needs of existing and future residents.</p> <p>World of Golf is a prime candidate for allocation:</p> <p>Opportunity for devt. on already developed land;</p> <p>Devt. could be master planned to ensure no harm to 5 purposes of the GB;</p> <p>Scope to enhance public access to wider GB;</p> <p>Softer option for release, an appropriate extension to existing residential area (especially if Flamingo Park is approved);</p> <p>Land is available now leased by U+I Group PLC – no site constraints to compromise deliverability;</p> <p>Suitable and sustainable location and achievable with housing delivered on site – therefore viable and deliverable option (over short – medium term);</p> <p>Potential otherwise for the land to be safeguarded</p>	<p>See responses to individual site allocations.</p> <p>See above explanation in relation to Green Belt boundary changes (and relevant paragraphs of Draft Local Plan including 1.4.16 – 1.4.18).</p> <p>See above explanation in relation to Green Belt</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>as per paragraph 85 of the NPPF for release if needed later in the Plan period.</p> <p>Alternatively Council should consider a Green Belt swap – working pragmatically to release suitable sites (recognising World of Golf fails to serve purpose of GB) – and allocate land not currently in GB that requires protecting. Anticipated White Paper will include measures to encourage such swaps.</p> <p>Whilst meeting requirement target falls significantly short of meeting OAN whilst not bringing into question draft allocations.</p> <p>Soundness of policy / Sust Appraisal and alternatives</p>	<p>boundary changes (and relevant paragraphs of Draft Local Plan including 1.4.16 – 1.4.18).</p> <p>Representation does not detail any land that would fulfil the criteria of a land swap – uncertain what land would be appropriate for such an exercise.</p> <p>See above response in relation to housing need.</p> <p>See above response in relation to Sustainability Appraisal</p>	
61_1	Kieran Wheeler, Savills for Bellway Homes	<p>Proposes Maybrey Works Lower Sydenham</p> <p>Target of 641 should be considered as a minimum target and further capacity challenged to positively meet needs of the borough and strategic housing gap of London. Significant scope for target to be pushed in spirit of significantly boosting housing supply – more innovative solutions could be used to assist in meeting specific needs – in particular reuse of brownfield land, promoting residential led mixed use developments. Reference made to LP adopted target of 42,000 dpa versus need for between 49,000 and 62,000 dpa. Other assessments estimate an even higher need (i.e. over 60,000 per annum). 5YHLS agreed in November 2016 but reference is made to the appeal decision at Land to the rear of Former Dylon International Premises (August 2016) that specified the Council does not have a 5YHLS. Propose a more ambitious annual target is considered to secure boost in the supply, wording of policy should promote reuse of brownfield land and residential mixed use devts.</p>	<p>Current planning application for mixed-use development.</p> <p>See above responses in relation to housing need (including 25_1_ and site assessments carried out.</p> <p>See response 61_9 in relation to the site within Working in Bromley chapter.</p> <p>June 2015 5YHLS Paper was updated following receipt of the Inspector's decision into Land to the rear of Former Dylon Premises (August 2016). Updated Paper was agreed by the Council in November 2016.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
65_1	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	<p>Land East of Thornet Wood Road should be allocated for at least 41-65 residential units.</p> <p>Site Assessment 2015 recommended site is not allocated due to GB designation.</p> <p>Reference made to FALP and housing requirement targets being insufficient to meet OAN and the need for a review of the LP.</p> <p>LBB does not have an up-to-date SHLAA / SHMA to determine full OAN. Evidence base for FALP is outdated. Council should endeavour to provide more than 641 dpa in anticipation of LP review. LBB has not demonstrated 5YHLS.</p> <p>626 on small sites over next 5 years is unrealistic as Council argued there is a finite supply of these sites (FALP evidence). Inspector in recent appeal (Footsie appeal) disputed inclusion of Sundridge Park Manor and former Town Hall in supply.</p>	<p>See also responses above in relation to housing need including 25_1.</p> <p>Paragraphs 1.3.7 (Vision and Objectives), 1.4.3 – 1.4.6 (Spatial Strategy) Draft Policy 1 and Appendix 10.1 set out some of the context for future housing supply in the borough. Paragraph 2.1.15 makes reference to the level of housing need annually in the borough that ranges from 1320 dpa in the 2014 sub-regional SHMA to 1840 dpa (short term variant) as published in the GLA 2014 household projections.</p> <p>The small site windfall allowance set out in Appendix 10.1 has been calculated based on the most recent small site completions over an eight year period. It is evident that for the monitoring year 16/17 up to January 2017 147 units on small sites have been completed (excluding respa completion). Further, more detailed monitoring is carried out during the early summer to account for all completions during the financial year. The conservative figure included in the trajectory is seen to be a realistic figure over 5 years. The trajectory does not include Sundridge Park Manor but instead Sundridge Park Management Centre. The appeal made reference to an increase in units attributed to the town hall during the preparation of evidence based on the June 2015 5YHLS Paper. The trajectory relates to the most recent planning permission granted for the site which is seen to be acceptable for the updated November 2016 Paper.</p> <p>It is considered that the borough does not have a</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Housing delivery since 1996 shows deficit of 1063 units.</p> <p>13 sites (660 – 705 units) in Chapter 10.2 allocated are insufficient – further sites necessary. Suggest need for a GB review and describes site.</p> <p><u>London Plan Review</u></p> <p>See above also. FALP housing target of 641 is considered inadequate, significantly below the boroughs actual housing need requirement. Acknowledged by FALP Inspector housing targets are inadequate with evidence base produced to support FALP almost immediately outdated.</p> <p>As London Plan review was not undertaken immediately following adoption of LP. Bromley does not have an up to date SHLAA or SHMA. Should seek to significantly provide more than 641 dpa in anticipation of review of LP (commenced). Other boroughs including Croydon and Camden have undertaken SHLAAs / SHMAs since adoption of FALP and increased housing targets (by 184 to 1073 and by 158 to 1593 respectively). Provides examples of boroughs addressing need proactively. LB Bromley not using Local Plan to address need – flawed approach that is not in accordance with NPPF or borough housing needs. Taking account of 6600 undersupply across London results in 744 dpa (rising to 943 taking account of GLA SHMA including backlog). Emphasises need for Council to carry out independent review of OAN and consider increase in site allocations (need for review for Plan to be found sound). Emphasised</p>	<p>housing shortfall. Prior to the compilation of the April 2011 5YHLS Paper the GLA confirmed that targets from previous plan periods do not accrue. This is included in paragraph 2.2 of the Council's latest 5YHLS Paper. The Paper also demonstrates in Table 1 that there is not currently a shortfall in housing delivery of the past 9 years.</p> <p>See above explanation in relation to Green Belt boundary changes (and relevant paragraphs of Draft Local Plan including 1.4.16 – 1.4.18).</p> <p>See also above responses on housing need.</p> <p>Over the 15 year plan period Appendix 10.1 shows that approximately 10645 units could be developed against a requirement target, as set out in the London Plan, of 9615 units. Through the local plan process suitable draft allocations for residential development have been identified to contribute to meeting the requirement figure in addition to overall need. Additional sources of supply include; large sites which have acquired planning permission, a conservative small site allowance, opportunity sites included in the Bromley Town Centre Area Action Plan, broad locations and small allowances for vacant units and prior approvals.</p> <p>For clarification the London Plan is under review and the housing target for the borough is likely to change over the next 18 months. As part of the review the capacity of the borough will be taken into account systematically as opposed to a</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>in paragraphs 158 – 159 of the NPPF.</p> <p><u>5YHLS based on FALP OAN</u></p> <p>Using target of 641 LBB are unable to demonstrate a five year housing supply as a result of overreliance on small/windfall sites and unlikely delivery of site allocations. Over a five year period 3686 units are identified in trajectory (target of 3365 with 5% buffer). However 626 are proposed on small windfall sites. LBB representations to FALP refer to a downward trend of small site completions therefore 626 is considered unrealistic. Reference is made to paragraph 48 of the NPPF and the need to have compelling evidence to include a windfall allowance (and such sites will continue to provide a reliable source of supply).</p> <p>Reference made to the Dylon 2 appeal and the Inspector stating more recent data was available showing small site completions had reduced. Inspector also disputed the following sites – Sundridge Park Manor (14 units), Former Town Hall (53 units – 20 units included in June 2015 5YHLS). Recommends removing the 47 units.</p> <p><u>Historic undersupply</u> Bromley suffers from significant historic cumulative housing supply deficit of 1063 units further inhibiting ability to demonstrate 5YHLS (majority of deficit 1996 – 2004). Although accumulated over 4 plan periods need remains (148 dpa deficit). To help rectify undersupply Council needs to consider reviewing GB to maximise development potential. Also cites Bromley North as an excellent opportunity to deliver significant number of residential units towards housing stock.</p>	<p>“sharing out” the difference between the current London Plan requirement targets (42,000 dpa) and overall need (49,000 dpa – 62,000 dpa) between all of the London boroughs.</p> <p>See above for response on small windfall sites.</p> <p>As stated above the methodology for calculating Years 2-6 small windfall allowance has used the most recent data available (in accordance with Inspector’s observations for the appeal decision at Land to the rear of Former Dylon Premises August 2016). See above response in relation to Former Town Hall and Sundridge Manor.</p> <p>See above for response in relation to the fact that the borough does not currently suffer from under delivery in housing completions.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
67_3	Nick Taylor Carter Jonas for Beckenham Trustees	<p>Langley Court should be allocated as a housing site for 250 units.</p> <p>Increasing units (from 179 units) is consistent with national policy guidance and the development plan regarding making the best use of land and maximising housing numbers.</p>	<p>Site is not included within the Housing Trajectory as a draft allocation, but is listed as one of the sites that has potential to come forward for development within the next 5 years following its grant of planning permission in 2014.</p> <p>Clarification on potential future plans for the site welcomed. Any revised scheme submitted would be dealt with on their own merits and further evidence would be required.</p>	No modification
69_1	Paul McColgan GL Hearn for Milton Investment	<p>Proposes new site allocation at Hewitt's Farm (Green Belt) to include housing and office campus.</p> <p><u>Housing Need</u></p> <p>Draft Policy 1 unsound, not adequately taken account of the assessment of the boroughs OAN and falls substantially short of meeting boroughs housing need.</p> <p>Reference is made to; London Plan policy 3.3 and closing the gap between identified housing need and supply across the capital; paragraph 14 of the NPPF local plans should meet OAN with sufficient flexibility to adapt to rapid change unless the impacts of doing so would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate development should be restricted; paragraphs 157-159 of the NPPF are clear that plans should plan positively for the devt. needs of the area based on adequate, up-to-date relevant evidence, having a clear understanding of housing needs in their area (Case Law Satnum Millennium v Warrington Borough Council 2015, Hunston Properties v SSCLG and St Albans City and DC 2013, and R vs City and District of St Albans); Case Law clear there is a 2 stage process – OAN must be identified first before giving consideration to development and policy constraints. Essential if balancing act in paragraph 14 of the NPPF is to be properly undertaken.</p>	<p>See above responses in relation to housing need including 25_1.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Plan points to the 2014 SE London SHMA as providing the relevant evidence base (based on GLA 2013 round household projections – 1320 dpa.). Reference is made to GLA 2015 round and CLG 2014 household projections for Bromley, 1728 dpa and 1900 dpa respectively. Plan falls woefully short in meeting Boroughs housing need (meeting 33 – 37% Boroughs housing needs). Clear shortfall in delivery between 2011 – 2015 that increases scale of need.</p> <p>Plan not supported by evidence which demonstrates the borough cannot meet its needs or a greater proportion of it than proposed. Should update assessment of need, undertake Green Belt review and plan to meet OAN or close the gap between requirement and need figures.</p> <p><u>Housing Supply</u></p> <p>Cannot demonstrate a 5YHLS – five year period should be rolled forward to take account of completions 2015 – 2016 and any shortfall in delivery, substantial non-implementation rate (30%) should be applied to large and small prior approvals as highly unlikely all prior approvals will be built out (reduces by 101), lack of compelling evidence to include prior approval allowance (reduces by 200 units),</p> <p>Small sites allowance of 626 dwellings should be removed as double counts small site commitments and sites which have started, remove vacant unit allowance not warranted as a source of supply (280 dwellings). 5YHLS cannot be demonstrated in light of above.</p>	<p>See above explanation in relation to Green Belt boundary changes (and relevant paragraphs of Draft Local Plan including 1.4.16 – 1.4.18).</p> <p>Latest 5YHLS Paper agreed by the Council considers that a five year housing land supply can be demonstrated and sets out the current position on lapse rates. Prior approval allowance included as 5YHLS paper only includes those that have already commenced on site. In light of the number of units granted through the prior approval process that are currently in the pipeline and have not started (approx. 400 units) it is considered acceptable that an allowance was incorporated. To date approximately 40 units have started on sites of 9+ units that were not incorporated into the 5YHLS in November 2016.</p> <p>Small sites that are listed that have already started were removed from the small site allowance calculation. Vacant units returning to use are considered as a component of housing supply as set out in the GLA Housing SPG (March 2016) paragraph 1.2.5.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
78_1	Robert McQuillan, Robinson Escott Planning on behalf of Bromley Business Centre	<p>Bromley Business Centre Enterprise House, Hastings Road suitable for mixed use development including housing.</p> <p>Mixed use development which could help address need for both housing and B1 floorspace. Whilst 1(f) acknowledges mixed use development contribution Policy 82 should be amended.</p>	See response to Policy 82.	No modification.
79_2	John Escott, Robinson Escott Planning on behalf of Crystal Palace Football Club Ltd	<p>Crystal Palace Training Ground proposed as an alternative housing site allocation.</p> <p>Plan fails to give consideration to FALP Inspector's report that stated the evidence suggests LP strategy would not deliver sufficient homes to meet OAN. Therefore Plan not positively prepared as 641 will not meet OAN.</p> <p>Policy inconsistent with NPPF as it does not include the 5% buffer. Requirement should be 673 units per annum. Completed sites within the trajectory (Blue Circle, Ringers Road, County House, Grays Farm Production Village, 1 Chilham Way, Hayes Court, Rising Sun and Summit House) should be removed. Deduction would result in failure to identify 5YHLS.</p> <p>Table 1 does not present accurate picture of past supply and does not incorporate a lapse rate contrary to Dylon 2 appeal decision.</p>	<p>Metropolitan open land</p> <p>See above responses in relation to housing need and Green Belt boundaries including 25_1.</p> <p>The figure of 673 represents the boroughs requirement figure plus 5% (641 plus 5%) that is used to determine if a 5YHLS can be demonstrated annually. The correct housing requirement figure for the borough is 641 dpa (albeit a minimum figure) as set out in Table 3.1 of the London Plan.</p> <p>There are a number of units on larger named sites within the trajectory that are completed. Importantly they are included in Year 16/17 (Year 2 of the Plan) and should be represented as a source of supply within that period.</p> <p>The Council's position on lapse rates is set out in the November 2016 5YHLS Paper. Paragraph 2.7 specifies that:</p> <p>"Paragraph 2.1.21 of the Council's Proposed Submission Draft Local Plan November 2016 makes reference to 'Risk Assessment for Housing Land Delivery' in the Borough and sets out that in practice, large site windfalls in policy compliant locations do come forward, and reduce the risk of</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			<p>underachievement in housing delivery. Furthermore, the NPPF requirement is for 'deliverability' which includes a degree of uncertainty. The application of a lapse rate is therefore not considered necessary to deliverable sites within the 5YHLS".</p> <p>An additional Paper setting out detail in relation to paragraph 2.7 is currently in working draft form.</p>	
80_1	Labour Group	Paragraph 2.1.16 - Housing need in borough is for 1-3 bedroom units. What steps are taken to ensure housing construction in the borough reflects these needs?	Paragraph 2.1.16 sets out the likely mixture of unit sizes by percentage as set out in the 2014 SHMA. It also specifies that schemes of 5+ units should provide a mix of unit sizes (to take account of the sizes of units required) and will be considered on a case by case basis. There is a variety of sizes and types of sites available which should result in a mix of dwelling types (see Draft Local Plan housing trajectory).	No modification.
86_1	Will Edmonds, Montagu Evans for Taylor Wimpey	<p>The draft policy is supported, but the number of residential units allocated to the town centre is considered to be too low.</p> <p>Support second point of policy which refers to the facilitation of housing development through town centre renewal involving the provision of housing. Support encouragement for and allowance of housing delivery within the town centre.</p> <p>Suggest Elmfield Road is an appropriate location for residential development. Request clarification that Government imperative reflected in Framework and all Governments statements that there is a need to boost significantly the supply of housing should be reflected within policy.</p> <p>London Plan's allocation of Bromley Town Centre as an Opportunity Area identifies need for a minimum 2500 homes. Essential Local Plan reflects this (and gives clarity on how this is to be achieved including, where appropriate, site</p>	<p>Support welcomed.</p> <p>Number of units allocated within Bromley Town Centre reflects most recent work undertaken by officers/consultants (on town centre sites) and site assessment methodology.</p> <p>Support welcomed.</p> <p>The draft policy helps to facilitate residential development within Bromley Town Centre (and other town centre locations). The Draft Local Plan generally also identifies Bromley Town Centre as a key location for future residential development.</p> <p>Draft allocations have been identified within Bromley Town Centre that will help facilitate over 2500 homes in the lifetime of the Plan. Additionally, Bromley Town Centre is also identified as a broad location for further residential development over the next 15 years.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>allocations.</p> <p>Encourages caution on over reliance on sites identified in early years of the Plan given complexity of some of Bromley town centre sites that could undermine demonstration of 5YHLS.</p> <p>Greater consideration should be given to other sites such as Conquest House located in the town centre in highly sustainable locations. Council acknowledge there are redevelopment opportunities for such sites no recognition of this referenced in emerging Plan. This failing could result in other less appropriate locations being brought forward on grounds of lack of 5YHLS contrary to overarching strategies within the Plan.</p>	<p>Sites have been included in the early years of the Plan (2-6) that are considered deliverable as set out in the 5YHLS Paper Nov 2016.</p> <p>See response above in relation to overall support within the Plan to future housing development within Bromley Town Centre.</p>	
87_2	John Escott, Robinson Escott Planning on behalf of Mr P Antill	<p>Alternative housing site at Thornet Wood Road Bickley. Site should be removed from the Green Belt and allocated for housing.</p> <p>Policy inconsistent with NPPF as it does not include the 5% buffer. Requirement should be 673 units per annum. Completed sites within the trajectory (Blue Circle, Ringers Road, County House, Grays Farm Production Village, 1 Chilham Way, Hayes Court, Rising Sun and Summit House) should be removed. Deduction would result in failure to identify 5YHLS. Table 1 does not present accurate picture of past supply and does not incorporate a lapse rate contrary to Dylon 2 appeal decision. Plan fails to give consideration to FALP Inspector's report that stated the evidence suggests LP strategy would not deliver sufficient homes to meet OAN. Therefore Plan not positively prepared as 641 will not meet OAN.</p>	See response to 79_2 above.	No modification.
89_2	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	<p>Alternative housing site - Potters Farm and Bromley Sea Cadets. Site should be removed from the Green Belt and allocated for housing.</p> <p>Policy inconsistent with NPPF as it does not include the 5% buffer. Requirement should be 673 units per annum. Completed sites within the</p>	See response to 79_2 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>trajectory (Blue Circle, Ringers Road, County House, Grays Farm Production Village, 1 Chilham Way, Hayes Court, Rising Sun and Summit House) should be removed. Deduction would result in failure to identify 5YHLS. Table 1 does not present accurate picture of past supply and does not incorporate a lapse rate contrary to Dylon 2 appeal decision. Plan fails to give consideration to FALP Inspector's report that stated the evidence suggests LP strategy would not deliver sufficient homes to meet OAN. Therefore Plan not positively prepared as 641 will not meet OAN.</p>		
90_1	John Escott, Robinson Escott Planning on behalf of Lansdown Asset Management	<p>Alternative Housing Mixed Use site - 38 Croydon Road, Beckenham (Vacant, Elmers End LSIS)</p> <p>Draft Policy commits Council to make provision for London Plan target in 10 different ways – including (f) – mixed use development including housing in suitable locations; Proposed site is suitable to address both business and housing needs of the borough.</p>	See response to Policy 82.	No modification.
91_2	John Escott, Robinson Escott Planning on behalf of Joseph Samuel Corporation	<p>Alternative Housing Site - The Northern Land, South Eden Park Road, Beckenham be removed from Urban Open Space and allocated for housing.</p> <p>Policy inconsistent with NPPF as it does not include the 5% buffer. Requirement should be 673 units per annum. Completed sites within the trajectory (Blue Circle, Ringers Road, County House, Grays Farm Production Village, 1 Chilham Way, Hayes Court, Rising Sun and Summit House) should be removed. Deduction would result in failure to identify 5YHLS. Table 1 does not present accurate picture of past supply and does not incorporate a lapse rate contrary to Dylon 2 appeal decision. Plan fails to give consideration to FALP Inspector's report that stated the evidence suggests LP strategy would not deliver sufficient homes to meet OAN. Therefore Plan not positively prepared as 641 will</p>	<p>See response to 79_2 above.</p> <p>See above responses in relation to housing need and designated open space designations including 25_1.</p> <p>Currently planning application for residential development of this site.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		not meet OAN.		
92_2	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	<p>Alternative housing site - Jackson Rd nursery - Site should be removed from the Green Belt and allocated for housing.</p> <p>Policy inconsistent with NPPF as it does not include the 5% buffer. Requirement should be 673 units per annum. Completed sites within the trajectory (Blue Circle, Ringers Road, County House, Grays Farm Production Village, 1 Chilham Way, Hayes Court, Rising Sun and Summit House) should be removed. Deduction would result in failure to identify 5YHLS. Table 1 does not present accurate picture of past supply and does not incorporate a lapse rate contrary to Dylon 2 appeal decision. Plan fails to give consideration to FALP Inspector's report that stated the evidence suggests LP strategy would not deliver sufficient homes to meet OAN. Therefore Plan not positively prepared as 641 will not meet OAN.</p>	<p>See above responses in relation to housing need including 25_1.</p> <p>Planning application reference 16/02067/FULL1 for 9 dwellings granted on appeal (March 2017). Considered inappropriate to allocate within Draft Local Plan, instead the scheme will be listed within the housing trajectory as updated.</p>	No modification.
94_1	Clare Loops, London Borough of Bexley	Notes Housing Supply Policy 1 that states the Council will make provision for the minimum London Plan housing target. Bexley currently preparing evidence base for new Local Plan. Given the early stages of this policy framework Bexley is unable to meet the shortfall in Bromley's identified housing need. Nonetheless, the five southeast London boroughs have jointly produced a SHMA which shows collectively the boroughs can meet their identified housing need.	Noted.	No modification.
95_2	Diana Thomson, Savills for Legal and General Property Partners	<p>Alternative housing site - Bromley Industrial Centre, Waldo Road. Site should not be an LSIS but is suitable for residential development.</p> <p>A target in excess of 641 units per annum is required in order to meet the needs of the borough and strategic housing gap across London. Consensus across industry that London's adopted housing target of 42,000 new homes per annum is too low (needs are 49,000 – 62,000 to address backlog of housing shortfall</p>	<p>See response to 95_1 and Policy 82 and above responses in relation to housing need including 25_1.</p> <p>The Draft Local Plan proposes a suitable and sustainable balance between employment and housing needs, taking into account the London Plan.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>over 10 or 20 years). Other assessments estimate an even higher need (i.e. over 60,000 per annum). 5YHLS agreed in November 2016 but reference is made to the appeal decision at Land to the rear of Former Dylon International Premises (August 2016) that specified the Council does not have a 5YHLS. Consider Proposed Submission Draft Local Plan is unsound and has not identified enough available sites to meet identified need. Significant scope for target to be pushed in the spirit of significantly boosting housing supply, more innovative solutions could be used to assist in meeting needs (i.e. reuse of brownfield land and organising development to ensure most efficient use of land).</p>		
97_2	John Escott, Robinson Escott Planning on behalf of Bromley Football Club	<p>Alternative housing site proposed – Bromley Football Club.</p> <p>Site is previously developed land and could be removed from the Green Belt and developed for residential to enable relocation of the Club into the Norman Park sports hub. Importance of contribution to housing needs and securing longer term future of one of boroughs major sporting organisations and substantial community benefits in terms of improved sporting and recreational facilities.</p>	See responses to Section 5.2 - Open and Natural Space: 97_1 - Draft Policy 58 and 97_3 - Draft Policy 49. See also above responses to housing need including 25_1.	No modification.
101_1	Bob McQuillan for Richard Tear	<p>Proposes Oakley Farm Oakley Road</p> <p>Inconsistent with national policy as set out in the Framework. Minimum requirement of 641 additional homes does not include the 5% buffer. Requirement is 673 additional homes. Units within the first five years that have completed in the trajectory should not be included. No consideration has been given to the incorporation of a lapse rate as referred to in a recent appeal decision (Land to the rear of Dylon). Draft Local Plan fails to give consideration to Inspector's report into the FALP (November 2014) and meeting OAN – Draft Policy 1 will not meet OAN (that could be in the region of an additional 200 units per annum if 6600 is divided by the 33</p>	<p>See above responses in relation to housing need and Green Belt boundaries.</p> <p>The figure of 673 represents the boroughs requirement figure plus 5% (641 plus 5%) that is used to determine if a 5YHLS can be demonstrated annually. The correct housing requirement figure for the borough is 641 dpa (albeit a minimum figure) as set out in Table 3.1 of the London Plan. There are a number of units on larger named sites within the trajectory that are completed. Importantly they are included in Year 16/17 (Year 2 of the Plan) and should be represented as a source of supply within that period.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>boroughs).</p> <p>Evidence should include a register of previously developed land (Housing and Planning Act) without which credibility of windfall assumptions is unsupported.</p> <p>No evidence to show the Local Plan will enable a realistic five year housing supply target, therefore reasonable to expect minor alterations to GB boundary.</p>	<p>The DCLG specifies that Brownfield registers will provide up-to-date, publicly available information on brownfield land that is suitable for housing. Regulations requiring local authorities to prepare and publish brownfield registers will be laid in Parliament shortly.</p> <p>Council's latest 5YHLS position agreed in November 2016. It concludes there is a 5 five year supply of deliverable land for housing.</p>	
122_1	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	<p>Land Improvement Holdings freehold owner of 17ha greenfield site known as St Mary Cray East. Highly sustainable and logical urban extension site (for 350-500 units). Suggests removal of Green Belt designation based on housing policy aspects set out below.</p> <p>Housing and affordability crisis at critical stage in London and the wider South-East region. Govt. is clear that solving housing crisis is a key priority. Identifies 2 stage approach, firstly establishing FOAN, only then consider if a constrained (or increased) figure should apply. If FOAN is not considered properly consideration of restrictive designations (i.e. Green Belt) cannot be undertaken properly.</p> <p>Evidence base does not include a SHMA.</p> <p>The DLP is not ambitious enough with regards to meeting housing need and delivering job creation. Likely to result in substantial shortfall of housing supply over the Plan period.</p> <p><u>Bromley's Housing Need</u></p> <p><u>The London Plan 2016</u> Reflects housing need and requirements of Greater London rather than individual needs of</p>	<p>See above responses in relation to housing need and designated open space designations including 25_1.</p> <p>See responses to Working in Bromley chapter in relation to employment forecasts.</p> <p>See above responses in relation to housing need</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>local authorities. Overall housing target of 42,000 new homes per annum (25,600 affordable). Actual need identified 49,000 – 62,000 new homes per annum. Completions for 14/15 were only 27,819 homes. A full review of the London Plan is underway in order to address this housing shortfall – a City for All Londoners document (October 2016) identified possible target of 50,000 homes per year. Higher targets likely for London boroughs. LBB should be preparing for this rather than proceeding with 641 dwellings per annum – Plan should be addressing OAN. Boroughs are expected to seek to achieve and exceed the relevant minimum annual average housing target – in our view this approach to strategic and local plan-making is flawed, contributing towards the under-delivery of housing in outer London boroughs. Boroughs should be expected to deliver their basic housing needs (for LBB 1300 dpa 2014 SHMA – DCLG and other ranges quoted 1650 – 2330 dpa). Applying the latter would result in a shortfall of 1139 – 1689 homes per annum resulting in the worsening of the current affordability crisis in Bromley. Minimum housing target should be increased to at least 1780 dpa.</p> <p><u>The Housing Trajectory</u></p> <p><u>Five year supply</u> in the Draft Plan identifies 3686 dwellings (5.48 years at the requirement of 673 units). Satisfies London Plan figures but these are derived from a supply based assessment and do not meet OAN. DLP does not identify if a 5% or 20% buffer will be applied and past rate of completions. Table 2 of the representation demonstrates that 30% of 5YHLS comes from sites which do not have planning permission. Rises to more than 50% for first ten years of the plan period.</p> <p><u>Vacant units (80 units)</u> London Plan does not identify vacant units as part of borough's requirement target. Therefore</p>	<p>and designated open space designations.</p> <p>The Council's 5YHLS Paper agreed in November 2016 specifies that a 5% buffer is the appropriate buffer to apply based on past housing delivery (last 9 years). The components of sites / sites included are considered deliverable for reasons set out in the November 2016 Paper.</p> <p>Vacant units returning to use are considered as a</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>should not be included.</p> <p><u>Prior approval allowance (200 units)</u> Consider the 200 units to be unsubstantiated. Unreasonable and unrealistic in light of Article 4 Direction for BTC. Majority of prior approval sites would have come forward already since 2013.</p> <p><u>Small site allowance</u> An allowance for 626 small windfall sites has already been made. Value of small windfall sites relates to the history of windfall delivery in the Borough. We have not argued to reduce the no. of windfall sites in our projection. Urge LBB to consider the impact of windfall allocations to meet a minimum target.</p> <p>Issues of quality are also raised, unlikely to deliver quality family homes in a range of tenures due to urban location.</p> <p>Table 3 confirms the 5YHLS position is based on 3210 homes (4.76 years). LBB cannot</p>	<p>component of housing supply as set out in the GLA Housing SPG (March 2016) paragraph 1.2.5. It is acceptable to include an element within the trajectory even though the LP does not attribute a target for the borough. Only boroughs where long term vacants accounted for over 0.75% of the total stock were given a target for this component (for example 696 vacant properties Oct 2015 out of an approximate number of households of 136,300 = 0.5%).</p> <p>Prior approval allowance included as 5YHLS paper only includes those that have already commenced on site. In light of the number of units granted through the prior approval process that are currently in the pipeline and have not started (approx. 400 units) it is considered acceptable that an allowance was incorporated. To date approximately 40 units have started on sites of 9+ units that were not incorporated into the 5YHLS in November 2016.</p> <p>The small site windfall allowance set out in Appendix 10.1 has been calculated based on the most recent small site completions over an eight year period. It is evident that for the monitoring year 16/17 up to January 2017 147 units on small sites have been completed (excluding respa completion). Further, more detailed monitoring is carried out during the early summer to account for all completions during the financial year. The conservative figure included in the trajectory is seen to be a realistic figure over 5 years.</p> <p>Trajectory includes a range of sites in different locations that are likely to include different unit sizes and different tenures.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>demonstrate a 5YHLS even with a significant reliance on small windfall sites. Plan does not therefore accord with paragraph 47 of the NPPF and is unsound.</p> <p><u>Long-term Housing Trajectory</u> Policy 1 proposes to make provision for a minimum average of 641 dwellings every year “over the ten year plan period and <u>where possible</u> over the fifteen year plan period”. NPPF requires Local Plans to be positively prepared to meet housing needs. LBB should be pro-actively planning to meet its minimum housing target throughout the plan period.</p> <p>Using minimum target of 641 dpa LBB need to identify 9615 homes over 15 years. Trajectory identifies 10,645 equating to 710 dwellings per annum (Identified sites 5548, 52.1% and Unidentified sites 5097, 47.9%).</p> <p>Assessment of <u>draft allocations</u> in Table 6 results in 840 units compared to 2805 units in Draft Plan.</p> <p>Assessment of <u>commitments</u> (2029 units) results in 1826 units applying a 10% lapse rate (quotes 2014 5YHLS and delivery on sites smaller than 9 net units compared to permissions.</p> <p><u>Broad locations</u> not discounted as discount small site projections below by 3026 units. Also would have assumed sites would have come through site allocations process.</p> <p><u>Small site projection</u> Paragraph 4.58 of the representation mentions 1320 small windfall units in the first five years of the trajectory in error. Reference is made to 1320 in years 6-10 and 1706 in years 11-15 (correct). PPG allows for an allowance in the 5 year supply subject to compelling evidence. Beyond this time period</p>	<p>See above regarding Council’s current 5YHLS position.</p> <p>Paragraph 3-027 of the PPG specifies that, as set out in the Framework local planning authorities should identify a supply of specific developable sites or broad locations for growth where possible for Years 11-15. Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15.</p> <p>See responses to site allocations.</p> <p>See above responses in relation to current lapse rate position.</p> <p>National guidance allows for the identification of broad locations for latter years including Years 6-10 and Years 11-15 (paragraph 47 NPPF and para 3-027 of the PPG).</p> <p>Paragraph 3-24 of the PPG mentions that local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance based on a geographical</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>(Years 6-15) LPAs should identify broad locations and therefore the allowance should be based on specific geographical areas. 3026 homes are discounted for this reason.</p> <p>See above for <u>Prior approvals</u> and <u>Vacant units</u></p> <p><u>Summary of trajectory assessment</u> Trajectory reduced from 10,645 to 5015 units</p> <p>Plans objective of seeking to ensure an appropriate supply of homes to meet varied needs of the local population will not be met in terms of OAN or in the minimum requirement figure. Concerted effort to avoid designated land consistent with the NPPF but these locations must be considered where the alternative strategy cannot meet need or even minimum targets.</p> <p>Representation includes detailed assessment of 2014 SHMA by Regeneris Consulting Ltd – comments on inappropriateness of actual housing market area.</p>	<p>area. In this respect it specifically refers to using the same criteria as set out in paragraph 48 of the Framework. On this basis it is considered acceptable to incorporate an allowance based on the boroughs historic trends and the fact that the London-wide SHLAA also incorporates an allowance for all boroughs across the London Plan period.</p> <p>See above responses in relation to housing need.</p>	
123_2	Gillian Kavanagh, Savills on behalf of Legal & General	<p>Sydenham Industrial Estate is appropriate for alternative uses including residential and should be available within the next five years.</p> <p>A target in excess of 641 units per annum is required in order to meet the needs of the borough and strategic housing gap across London. Consensus across industry that London's adopted housing target of 42,000 new homes per annum is too low (needs are 49,000 – 62,000 to address backlog of housing shortfall over 10 or 20 years). Other assessments estimate an even higher need (i.e. over 60,000 per annum). 5YHLS agreed in November 2016 but reference is made to the appeal decision at Land to the rear of Former Dylon International Premises (August 2016) that specified the Council does not have a 5YHLS. Consider Proposed</p>	See response to 123_1 and Draft Policy 82. See also above responses in relation to housing need including 25_1. See also response to 95_2 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Submission Draft Local Plan is unsound and has not identified enough available sites to meet identified need. Significant scope for target to be pushed in the spirit of significantly boosting housing supply, more innovative solutions could be used to assist in meeting needs (i.e. reuse of brownfield land and organising development to ensure most efficient use of land).		
124_2	Gillian Kavanagh, Savills on behalf of Legal & General	<p>Central House in the SIL is appropriate for alternative uses including residential (could be available within 5 years).</p> <p>A target in excess of 641 units per annum is required in order to meet the needs of the borough and strategic housing gap across London. Consensus across industry that London's adopted housing target of 42,000 new homes per annum is too low (needs are 49,000 – 62,000 to address backlog of housing shortfall over 10 or 20 years). Other assessments estimate an even higher need (i.e. over 60,000 per annum). 5YHLS agreed in November 2016 but reference is made to the appeal decision at Land to the rear of Former Dylon International Premises (August 2016) that specified the Council does not have a 5YHLS. Consider Proposed Submission Draft Local Plan is unsound and has not identified enough available sites to meet identified need. Significant scope for target to be pushed in the spirit of significantly boosting housing supply, more innovative solutions could be used to assist in meeting needs (i.e. reuse of brownfield land and organising development to ensure most efficient use of land).</p>	See response to 124_1 and Draft Policy 82. See also above responses in relation to housing need.	No modification.
125_1	Greater London Authority	Plan aims to deliver a minimum of 641 new homes a year, consistent with minimum figures set out in Table 3.1 of the London Plan. London Plan is clear these are minimum figures and LPAs are required to augment these to close the gap between need and supply. The Local Plan does highlight some of these broad locations for growth but does not set a strong direction in attempting to exceed the minimum target.	It is acknowledged that the figure of 641 is a minimum requirement figure for the borough as set out in Draft Policy 1. As set out above the Draft Local Plan specifies that the borough has a level of need significantly exceeding its requirement target. Through the local plan process (including participation with the London-wide SHLAA) suitable draft allocations for residential development have been identified to	<p>Minor amendment as follows:</p> <p>Insert at the end of paragraph 2.1.5</p> <p><i>“The housing trajectory in Appendix 10.1 shows a total of</i></p>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>This is a particular concern as OAN is set at 1320 homes per year. Acknowledged that the housing trajectory includes a range of sites totalling 10645 (700 homes per year). In line with the requirements of Policy 3.3 of the London Plan the Local Plan should set out clearly how minimum targets will be met and exceeded. Local Plan could provide policies which actively encourage sympathetic increases in suburban densities / and or allow for well- designed increases in the height of buildings, promoting more intense land use in and around town centres. Development of new housing in renewal areas is welcomed but there may be other parts of the borough where intensification would be achievable.</p>	<p>contribute to meeting the requirement figure in addition to overall need. As set out above a sub-regional SHMA has also been carried out to identify how need across the sub-region can be met.</p> <p>Additional sources of supply include; large sites which have acquired planning permission, a conservative small site allowance, opportunity sites included in the Bromley Town Centre Area Action Plan, broad locations and small allowances for vacant units and prior approvals.</p> <p>The Local Plan proposes that in each of the 5 year periods housing completions will exceed the minimum figures set out in Table 3.1 of the London Plan by over 1000. The inclusion of broad locations in the latter years of the trajectory is consistent with advice in the NPPF. The Local Plan does propose increases in densities in particular in town centres. The London Plan policies seek to prevent Green Belt encroachment as does the Draft Local Plan.</p> <p>Policy 3.3 of the 2016 London Plan 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. To help clarify that the housing trajectory at Appendix 10.1 is in accordance with clauses Da and E a minor amendment is proposed to the supporting text.</p>	<p><i>10,645 deliverable and developable dwellings over the Plan period, an annual average of over 700 dwellings."</i></p>
134_4	<p>Chris Francis, West and Partners for Dylon 2 Ltd</p> <p>(additional information from NLP Dec 2016)</p>	<p>Draft Policy fails to correctly assess and address OAN including failure to address affordable housing needs – therefore not in conformity with NPPF.</p> <p>Fails to include provisions which seek to exceed current target in accordance with Policy 3.3 D and Da of the London Plan. Fails to have proper regard to clear indications in the direction of travel of Govt. of need to take every opportunity to provide new housing. No provision for increasing</p>	<p>See above responses in relation to housing need including 25_1.</p>	<p>No modification.</p>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>density in vicinity of commuter hubs and on PDL including such land in the Green Belt. Fails to seek to meet objectively assessed devt. and infrastructure requirements and is not sound.</p> <p>Fails to identify Land to the rear of Dylon premises effectively endorsed by the Inspector (August 2016). Can make a meaningful contribution to OAN in early years of Plan period.</p> <p><u>NLP December 2016</u></p> <p>Clear objectively assessed need for BDLP to plan for significantly more homes (market and affordable) than current minimum target in London Plan;</p> <p>There is not a 5YHLS as a consequence of errors in Council's assessment methodology;</p> <p>BDLP is unsound in respect of housing target (to meet OAN) and housing supply available</p> <p>Plan is not:</p> <p>positively prepared as Strategy does not seek to meet OAN;</p> <p>not justified as does not provide most appropriate strategy in response to evidence available;</p> <p>effective as Trajectory is inadequate and not deliverable;</p> <p>consistent with national policy, by not meeting OAN it is not planning for sustainable development.</p> <p><u>Housing Need</u></p> <p>NPPF para 47 highlights the need to boost</p>	<p>Inspector's decision considers MOL in paragraphs 31-42 (including 2 MOL criteria that are not met).. The scheme was dismissed for reasons including harm to the openness of the MOL and the extent of harm that would be caused through inappropriate development and to the character and appearance of the surroundings.</p> <p>See above responses in relation to housing need.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>significantly the supply of housing, LPA's should use their evidence base to ensure the LP meets the full, objectively assessed needs for market and affordable housing. Housing figure against which to measure housing supply in a 5YHLS calculation is set out in para. 3-030 of the PPG.</p> <p><i>"Housing requirement figures in up to date adopted Local Plans should be used as the starting point for calculating 5YHLS. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless new evidence comes to light".</i></p> <p>LBB has used the minimum 641 housing target set through FALP (2014). Inspector's report into the FALP specified the targets will not provide sufficient housing to meet objectively assessed need. London as a whole is not meeting need and neither is Bromley.</p> <p>Disparity between housing needs of Bromley and quantity of homes being planned for (London SHMA 2013 1315 dwellings per annum, GLA Household projections 2014 Long Term Variant December 2015 1535 DPA, Short Term Variant 1855 per annum, DCLG 2012 Projected Annualised Household Growth 1780 per annum – Housing SPG March 2016).</p> <p>Early review into LP underway, new SHMA evidence expected 2017 – to meet OAN of London as a whole. Likely LBB will have a significantly increased target that could drastically alter 5YHLS position. If minimum need figure adopted and 5% buffer applied a figure of 1381 would apply per annum and 6904 over a 5 year period. Figure of 641 could become out of date almost immediately following adoption in light of LP review timetable. That is wholly unacceptable forward planning, affecting 5YHLS and 10 – 15</p>	<p>See above responses in relation to housing need.</p> <p>For clarification the London Plan is under review and the housing target for the borough is likely to change over the next 18 months. As part of the review the capacity of the borough will be taken into account systematically as opposed to the reference made to the minimum need figure for the borough in the representation. The minimum requirement figure is still relevant to the Local Plan preparation and the trajectory in Appendix 10.1 shows that the housing components included</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>housing trajectory periods too. Reference made in 2.0.3 and 2.1.21 to LP review but does nothing to seek to address need evidence available now – leading to possible shortfall and hardship contrary to BDLP homes objective, LP and NPPF.</p> <p><u>Housing Supply to meet OAN</u></p> <p><u>Lapse rates</u></p> <p>Inclusion of lapse rates for planning permissions has been established in High Court judgement between Cotswold DC and the SoS for CLG (November 2013). Paragraph 71 is clear that evidence of lapse rates in a LA constitutes sufficient compelling evidence to justify why some schemes will not be implemented.</p> <p>Evidence in LBB includes;</p> <p>GLA SHLAA (2013) Table 3.20;</p> <p>London Mayors Barrier to Housing Delivery Update (July 2014) – only half of the total number of dwellings granted planning permission every year are built (schemes of 20+ = 50% lapse rate);</p> <p>LBB Housing Supply Strategy (2005) 63% total permissions converted to completions 1999 – 2003 = 37% lapse rate;</p> <p>Blue Circle SoS appeal (2007) – cites 33% lapse rate;</p> <p>Anerley School for Boys appeal (2009) – cites 51% lapse rate;</p> <p>Dylon Phase 2 appeal (2016) – should be higher than 5% lapse rate.</p>	<p>exceed to the minimum figure (see also responses above).</p> <p>See above responses for current position on lapse rates.</p> <p>Considered that the purpose of Table 3.20 of the GLA's 2013 SHLAA is not to use differences in planning permissions and completions to come up with an appropriate lapse rate for London boroughs. The figures included in Table 3.20 include sites of all sizes, compared to sites listed in the trajectory that are 9+ units.</p> <p>As above the sites referred to in the document are of a specific size (20+ units). Of importance is deliverability / developability evidence for individual sites listed.</p> <p>As above sites of all sizes are referred to in the 2005 Strategy and deliverability / developability evidence for individual sites is of importance.</p> <p>See above responses for current position on lapse rates. Suggestion of 30 – 50% lapse rate is considered inappropriate.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Suggest a 30 – 50% lapse rate for sites with planning permission not commenced.</p> <p><u>Windfall sites</u></p> <p>Reference is made to the Dylon Phase 2 appeal, Inspector considered the appellant’s windfall figure “would be a more realistic figure” and a conservative midway figure would miss the 5YHLS target. More recent data (post 2011/12) has not been analysed to justify the application of an outdated annual figure going forward.</p> <p>Important not to include double counting with small site approvals and those commenced. Absence of clear and transparent evidence of how small sites allowance figure relates to other small sites supply figures, concern that there is double counting on the largest component in the Trajectory.</p> <p><u>Deliverability and Delivery Rates</u></p> <p>Concern that some sites included are not deliverable in relation to footnote 11 of the NPPF and advice in the NPPG (3-019, 3-020, 3-021).</p> <p>Includes: Small Halls, York Rise Orpington Criticism of slow delivery on – BTCAAP sites at Ringers Road, Westmoreland Road Car Park and</p>	<p>Years 2 – 6 of the housing trajectory in Appendix 10.1 have been calculated using the most recent data over an 8 year period taking into account the observations of the Dylon Phase 2 appeal Inspector’s observations. Years 7-11 are calculated using data over a 12 year period (including the most recent data). The remainder of the years (12-15) are based on the current small site allowance for the borough.</p> <p>Any listed small sites (9+ units) have been subtracted from the small site allowance calculation. The small site allowance was calculated on the basis that prior approval completions were not included (apart from 17 for 14/15 completions). Therefore additional prior approval completions could be counted separately.</p> <p>Vacant units brought back into use are often not subject to planning permission so again would be treated separately and would not be double counted. Checking of data would ensure double counting did not occur where vacant units were included as part of overall completions.</p> <p>See responses to site allocations.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Dylon Phase 1 units.</p> <p>Inside Housing article (14.10.2016, Savills research) cite LBB as one of 100 worst performing LA areas (one of the worst in London) for population growth outstripping housing supply.</p>		
135_4	<p>Chris Francis, West and Partners for Relta Ltd</p> <p>(additional information from NLP Dec 2016)</p>	<p>Draft Policy fails to correctly assess and address OAN including failure to address affordable housing needs – therefore not in conformity with NPPF.</p> <p>Fails to include provisions which seek to exceed current target in accordance with Policy 3.3 D and Da of the London Plan. Fails to have proper regard to clear indications in the direction of travel of Govt. of need to take every opportunity to provide new housing. No provision for increasing density in vicinity of commuter hubs and on PDL including such land in the Green Belt. Fails to seek to meet objectively assessed devt. and infrastructure requirements and is not sound.</p> <p>Fails to identify Land to the rear of Dylon premises effectively endorsed by the Inspector (August 2016). Can make a meaningful contribution to OAN in early years of Plan period.</p> <p><u>NLP December 2016</u></p> <p>See above</p>	See above.	No modification.
138_1	Andy Black for CALA Homes	<p><u>Duty to Co-operate</u></p> <p>Provisions within Draft Plan at paragraph 1.2.9 are noted.</p> <p>References are made to the Duty to Co-operate within existing guidance (London Plan Policy 2.2E, NPPF paragraph 156, 179, 181). Acknowledged that there has been discussion with other London boroughs. Unclear though how draft plan policies have been shaped as a result of this. Several housing renewal areas cross into neighbouring planning authorities and there is no detail to explain how housing numbers are to be</p>	See above responses in relation to Duty to Cooperate and housing need including 25_1.	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Reliant on small sites for half the target – little certainty that these sites will actually materialise, without same assurance as larger allocated sites.</p> <p>Further clarification needed on paragraph 2.1.21 including reference to “too low” (if larger sites exist these should be identified).</p> <p>Reference made to Langley Court and potential for 250+ units on site compared to 179 listed in trajectory. No objective in Draft Policy to increase density on existing sites with planning permission - clear this exercise has not been carried out – strategy therefore under delivers on potential to boost significantly the supply of housing as directed by the NPPF.</p>	<p>As set out above in previous responses the proposed allowance for small site delivery is considered to be realistic.</p> <p>As stated above larger sites have been identified through the Local Plan process. Paragraph 2.1.21 outlines that if monitoring shows the small site element is lower than expected over time then larger sites that have been identified (possibly later in the Plan period) may need to be brought forward in cooperation with the relevant bodies (landowners / developers).</p> <p>The figure of 179 was included as this relates to the most recent planning permission for the site and what was considered deliverable. The Council will take into account any changes to schemes (including cases where the density is increased) on a case by case basis.</p>	
143_1	Bob Neill MP	<p>Recognise need for additional housing provision. Welcome Council's explicit acknowledgement that these are areas of priority over the coming years. Preference should always be given to PDL albeit with different uses and building upon open land avoided if at all possible reflecting hierarchy of open land protection. Development sites in Bromley Town Ward, particularly the Civic Centre site should be sensitively designed.</p>	Noted and welcomed.	No modification
149_1	Neeraj Dixit for Mike Corby Management	<p>Former Natwest Sports Ground should be allocated for housing and deleted from MOL. The site is available for development, suitable for development and is achievable (single ownership, no contaminated land, part of site in Flood Zone 2 and 3, accessible location, some recreation and leisure uses on site are in unattractive and visually prominent buildings that detract from quality of MOL)</p> <p>Keen to work co-operatively alongside the Council</p>	See response to Draft Policy 50 Metropolitan Open Land representation 149_2 and 25_1.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>to deliver much needed housing and secure wider public accessibility / improvements to recreation and leisure on site.</p> <p>Recognise the important role MOL plays as part of London's multi-functional green infrastructure. However considers pressing need for new housing in Bromley, with improvements to quality/public accessibility of the MOL would outweigh any material harm.</p> <p>Council commits to a minimum of 660 units through allocated sites (5YHLS) but doesn't take into account non-delivery.</p> <p>Reference is made to other sites in the borough which have accommodated residential use (91-117 Copers Cope Road 11/000994/FULL1, Kent County Cricket Ground 11/02140/OUT, Dylon International 13/02555/DET) some of which are MOL and/or nearby to the NatWest Sports</p>	<p>With regard to the allocation of sites for development within the Green Belt (GB) paragraphs 1.4.16 – 1.4.18 of the Draft Local Plan set out that the Council is seeking to amend GB boundaries where there are exceptional circumstances and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere (Appendix 10.1 demonstrates residential development can be accommodated on non-designated sites).</p> <p>The Council's position on lapse rates is set out in the November 2016 5YHLS Paper. Paragraph 2.7 specifies that:</p> <p>"Paragraph 2.1.21 of the Council's Proposed Submission Draft Local Plan November 2016 makes reference to 'Risk Assessment for Housing Land Delivery' in the Borough and sets out that in practice, large site windfalls in policy compliant locations do come forward, and reduce the risk of underachievement in housing delivery. Furthermore, the NPPF requirement is for 'deliverability' which includes a degree of uncertainty. The application of a lapse rate is therefore not considered necessary to deliverable sites within the 5YHLS".</p> <p>An additional Paper setting out detail in relation to paragraph 2.7 is currently in working draft form.</p> <p>See response to Draft Policy 50 Metropolitan Open Land representation 149_2.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Ground.		
163_1	Michael Lebbie	Objects to the inclusion of Orchard Lodge within the Draft Plan (insufficient car parking, health and safety grounds through height, bulk and overlooking of nearby school).	Draft Allocation Site 7 Orchard Lodge, William Booth Road, Penge considered appropriate for allocation. Scheme granted planning permission in October 2016 and allocation of the site will verify the Council's intention for use of the site for residential purposes in the future.	No modification
168_4	Dr Elanor Warwick Clarion Housing Group	Committed to investing in homes for the borough's residents. Clarion have an active new homes development programme in Bromley. Range of residential sites for development presents diverse opportunities to deliver sustainable development in line with NPPF. Pleased to be involved in schemes including Bassetts Campus, Orchard Lodge and Homefield Rise. Look forward to taking part in future housing projects, this kind of long-term partnership is needed for realisation of Draft Plan's aspirations. Welcome Mayor's new housing zone in Bromley North.	Noted and welcomed.	No modification
176_1	Ray Foster	Appears to be considerable scope for double counting between small site allowance and the various contributions expected from other types of small sites.	<p>Any listed small sites (9+ units) have been subtracted from the small site allowance calculation. The small site allowance was calculated on the basis that prior approval completions were not included (apart from 17 for 14/15 completions). Therefore additional prior approval completions could be counted separately.</p> <p>Vacant units brought back into use are often not subject to planning permission so again would be treated separately and would not be double counted. Checking of data would ensure double counting did not occur where vacant units were included as part of overall completions.</p>	No modification.
181_3	Mr Peter Martin, Bromley Civic Society	<p>Policy is unsound because minimum target is unachievable over the Plan period.</p> <p>Realistic assessments of the following sites have not been carried out; Bromley Civic Centre, Land adjacent to Bromley North Station, The Hill Car Park and adjacent lands and West of Bromley High Street and land at Bromley South are</p>	<p>It is considered that the housing trajectory accompanying Draft Policy 1 identifies a range of housing components that are deliverable / developable during the Plan period consistent with NPPF/NPPG criteria.</p> <p>See responses to individual site allocations.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>expected to account for 1975 homes. Doubt over whether development on the scale envisaged can be achieved.</p> <p>If 641 homes per annum are dependent on unreliable estimates of potential capacity there will be an early shortfall in the target. This could then be exploited by those exploiting developments on unallocated sites (Green Belt, MOL, Urban Open Space and areas where local residential character could be harmed).</p>		

Bromley Proposed Submission Draft Local Plan consultation 2016 – Summary of Responses, June 2017

Appendix 10.2 – Proposed Housing and mixed use site allocations, Sites 1 to 13.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Housing Site 1 - Bromley Civic Centre				
28_2	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification.
38_3	Alice Roberts, CPRE London	The inclusion of the area of Urban Open Space (UOS) and Site of Importance for Nature Conservation (SINC) within the development boundary endangers a site of importance for human amenity, for the natural environment and also of historical importance. The boundaries should be altered to exclude the Urban Open Space and SINC to ensure that there is no impact on the green space.	<p>This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.</p> <p>The Civic Centre site includes three separately identified sites (A,B and C). Whilst all three areas contain varying amounts of built development, only B and C fall within the SINC (Local Importance). Site C will remain as a park, and comprises about 60% of the total area of the SINC. Of site B, which is within the SINC, 40% is already developed or covered by hard surfaces, The Civic Centre site allocation (set out in Appendix 10.2) expects proposals <i>'to minimise impacts on the Urban Open Space (Local Green Space) and Site of Importance for Nature Conservation'</i>. Proposals will also be considered in light of the relevant nature conservation policies within the Local Plan Valued Environments chapter and the London Plan.</p> <p>Overall the proposed allocation represents a suitable balance between the need for housing, nature conservation and other sustainability criteria.</p>	No modification.
59_2	Matthew Frith, London Wildlife Trust	The need for the allocation of new housing sites should not compromise the existing ecological integrity of land of biodiversity interest or potential. Object to the potential building of housing in	See response to 38_3 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>designated Sites of Importance for Nature Conservation (SINCs).</p> <p>The inclusion of the area of Urban Open Space (UOS) and SINC within the development boundary endangers the site. Recognise the commitment to minimise impacts of development on such areas, however, consider that the boundaries should be altered to exclude the SINC to ensure that there is no adverse impact upon it.</p>		
65_4	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	<p>Majority of site is a SINC, it also contains a Regionally Important Geological Site, a listed building (Grade II), it lies within a Conservation Area and an Area of Archaeological Significance. All of the latter would be extremely sensitive to redevelopment. The issue is whether the site can be redeveloped without significant harm to its heritage and environmental character. Biggest concern is uncertainty of delivery.</p>	<p>Comments on the SINC aspect of this representation are as above.</p> <p>Whilst the RIG as defined by the GLA is shown as an extensive part of the central part of the site, in fact it relates to four specific features (3 of which are man-made, and one imported) within Bromley Palace Park rather than the park in its entirety. None of these will be affected by any development. The relationship of any development will take the Conservation Area and status of the listed building into account in accordance to the appropriate policies in the plan. The Area of Archaeological Significance covers the entire Civic Centre site and surrounding residential Roads. Policy 46 requires archaeological assessments to accompany planning applications and resists development which <i>“would adversely affect Schedules Ancient Monuments or other Nationally Important Archaeological Sites, involve significant alterations to them or harm their settings”</i>.</p>	No modification.
66_9	Victoria Barrett NLP for LaSalle Investment Management	<p>The relationship of this site with AAP Site F is unclear and should be clarified. It is unclear whether the amended allocation means that replacement of the Pavilion leisure uses is no longer required if the site is developed for retail, or whether development at the Pavilion will no longer go ahead and as such the replacement of leisure would not be necessary. It is essential that this is clarified and also the potential knock-on implications of this are properly investigated through the review process of the</p>	<p>With the partial re development of the pavilion leisure centre now complete (Bowling & soft play etc) this is now seen as separate to the Civic Centre. The relationship between the two sites will be reviewed as part of the AAP review.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		BTCAAP.		
122_4	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	No justification for increase from 20 residential dwellings to 70. Where will the residential development be located?	The emerging Local Plan consultation 'Draft Allocations, Further Policies and Designations Document' indicated an allocation of approximately 20 units but noted that further work would be carried out to review Council accommodation needs and need for educational purposes. In September 2015 the Council's executive resolved to appropriate part of the site for a public park, part for a new democratic hub (requiring less accommodation in light of the transformation in provision of Council services) and facilitating residential development. It is considered that this will enable around 70 residential units, including the sensitive reuse of the Grade II listed Old Palace.	No modification.
148_1	Tony Banfield, Friends of Bromley Town Parks & Gardens	<p>Allocation is not reasonable or achievable. Not positively prepared - lack of evidence that proposal site can be achieved within known planning and heritage constraints</p> <p>Not justified – no evidence to demonstrate that the significance of the site has been taken into account in these proposals</p> <p>Contrary to national policy – the proposals are not supported by an adequate evaluation of the defining characteristics of these areas and do not therefore take adequate account of and respond to local character, history and identity, contrary to national policy (Para 58)</p> <p>the proposals at the quantum proposed will over power the Urban Opens Space designated area and heritage of the site – contrary to the NPPF which seeks to “secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”</p> <p>Site allocations will be granted permission in principle under details pursuant to the Housing and Planning Act 2016.</p>	See response to 38_3 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>It is inappropriate to give the Palace over to housing. Its use should remain in the public domain. The representation states that "As Planning and Heritage officer of the Friends of Bromley Town Parks and as Chair of Bromley Civic Society I am able to say that both groups would be more than happy to seek, for instance, heritage lottery funding in partnership with the Council for restoration of the historic setting of the Palace".</p>		
169_1	Tim Hayward	<p>Objects to the allocation as not justified and the plan not positively prepared</p> <p>There is a lack of evidence that the proposals can be achieved within the planning constraints of the site. The proposals have not therefore been positively prepared or are sustainable within the terms of the NPPF</p> <p>Not justified – there is little evidence that the significance of the site has been taken into account in these proposals. For example, Urban Open Space</p> <p>The boundary and allocation for 70 units is not reasonable or achievable and therefore contrary to the NPPF.</p> <p>The site has not been properly assessed for its historic significance.</p>	See response to 38_3 above	No modification.
181_6	Mr Peter Martin, Bromley Civic Society	<p>The site allocation is not positively prepared, not justified, and not consistent with national policy.</p> <p>Not positively prepared - lack of evidence that proposal site can be achieved within known planning and heritage constraints</p> <p>Not justified – no evidence to demonstrate that the significance of the site has been taken into account in these proposals</p> <p>Contrary to national policy – the proposals are not supported by an adequate evaluation of the</p>	See response to 38_3 above	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>defining characteristics of the area and do not therefore take adequate account of and respond to local character, history and identity, contrary to national policy (Para 58)</p> <p>the proposals at the quantum proposed will seriously harm the setting of heritage assets and an evidence base has not been produced to demonstrate otherwise – contrary to the NPPF which seeks to “secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”</p> <p>Site allocations will be granted permission in principle under details pursuant to the Housing and Planning Act 2016.</p> <p>Any proposal should consider the restoration of the historic landscape with clearance of the currently redundant Council offices which lie within UOS (designation remains unchanged). The proposals therefore have the effect of allocating housing in the UOS designated area.</p> <p>The boundary and allocation for 70 units is not reasonable or achievable and therefore contrary to the NPPF</p> <p>It is inappropriate to give the Palace over to housing. Its use should remain in the public domain.</p> <p>Both the Friends of Bromley Town Parks and Bromley Civic Society would be more than happy to seek, for instance, heritage lottery funding in partnership with the Council for restoration of the historic setting of the Palace</p>		
Housing mixed use Site 2 – Land Adjacent to Bromley North Station				
22_1	NHS property Services/ Boyer Planning	<p>Clinic site (which is owned by NHS Property Services) should not be included in Bromley North site allocation</p> <p>It is the Council's view that “<i>the clinic is</i></p>	<p>Outline permission to redevelop the clinic site for 9 units (16/02770) was refused by the Council and currently at appeal. One reason for refusal was that it “constitutes a piecemeal form of redevelopment which does not embrace adjoining</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p><i>considered an integral part of the site, and is therefore included in the site allocation” However</i></p> <p>1) The clinic site is located in one corner of the allocation and in terms of size it only makes up 0.02% of the wider site allocation (3Ha); 2) The existing health care use of the clinic is surplus to requirements and there is no demand from any other community providers; and 3) The proposed allocation now includes provision ‘space for community use’ however this change is not evidenced in anyway. Notwithstanding this, it is clearly preferable that any such space be provided on a part of the allocation more closely related to Bromley town centre rather than an edge of site location such as the existing clinic.</p>	<p>land in order to support the wider comprehensive regeneration and integration of the site as part of the wider Opportunity Area for Bromley Town Centre....”</p>	
23_6	Patrick Bloom	<p>Accepts principle but needs to be scaled back. Too high, will affect views, pressure on existing infrastructure.</p>	<p>This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.</p> <p>The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density ton centre, whilst respecting and enhancing the setting of the Grade two Listed Building. The detailed design will be subject to a planning application and assessed at application stage.</p> <p>The Local Plan and Infrastructure Delivery Plan provides for schools and infrastructure required to support the delivery of the Local Plan vision and objectives and the level of housing growth identified. The impacts on infrastructure will be assessed at planning application stage and the developer would be required to mitigate against any negative impacts.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
28_3	Richard Hill, Thames Water	Water Resource area. The mains are running close to or at capacity. The developer will be required to fund impact study to determine the magnitude of spare capacity and suitable connection point. The waste water network capacity is unlikely to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required. Early contact Thames Water is recommended.	Comments noted.	No modification.
30_8	Mr Hough - Sigma Planning Services for South East Living Group	Deliverability is questionable. The site has consistently failed to come forward.	The majority of the site is "developable". The Council is actively working to develop this site together with other land owners including Network Rail & Prime Place. The majority of the site falls within years 6 to 10 of the housing trajectory.	No modification.
31_1	Mr Ozay Ozay	<p>500 units is too much; infrastructure cannot cope, already congested with limited parking, need a direct train to London to support development of the site, will ruin the character – building heights should not go above existing building heights.</p> <p>Infrastructure must come before more housing.</p>	<p>Indicative massing studies together with the use of London Plan density Matrix demonstrate that the site can accommodate the scale of development set out in the site allocation.</p> <p>The details/design will be subject to a planning application and assessed at application stage. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre.</p> <p>The Local Plan and Infrastructure Delivery Plan provides for schools and infrastructure required to support the delivery of the Local Plan vision and objectives and the level of housing growth identified. At application stage, the impacts on infrastructure would be assessed and the developer would be required to mitigate against any adverse impacts on infrastructure.</p>	No modification.
32_1	Mr Martin Cooper	<p>Raises several design issues related to bulk and density and potential impacts including traffic congestion, quality of life and supporting infrastructure.</p> <p>Bus station under homes will be unpleasant for residents in terms of noise and pollution.</p>	<p>The details/design will be subject to a planning application and assessed at application stage. The traffic impact will also be assessed at this stage.</p> <p>The Local Plan and Infrastructure Delivery Plan provides for schools and infrastructure required to support the delivery of the Local Plan vision and</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			objectives and the level of housing growth identified. The developer will be required to mitigate against any impact on infrastructure.	
35_1	Patricia Collins	<p>Objects to allocation.</p> <p>Large amounts of money spent to achieve village effect in Bromley North – proposed development will be out of character. Should respect conservation area.</p> <p>Where will schools, surgeries and transport links be for residents?</p> <p>Supports Babbacombe Road response</p>	<p>As noted in the London Plan Para 3.42, large sites have the potential to define their own characteristics and accommodate higher density development in line with Policy 3.4.</p> <p>The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre. And respect the conservation area.</p> <p>The impacts on infrastructure will also be assessed at planning application stage and the developer would be required to mitigate against any negative impacts. The Local Plan and Infrastructure Delivery Plan provides for schools and infrastructure required to support the delivery of the Local Plan vision and objectives and the level of housing growth identified.</p>	No modification.
30_7	Mr Hough - Sigma Planning Services for South East Living Group	The Council need to demonstrate that the proposal is deliverable because so many previous proposals have not been implemented.	The Area Action Plan was adopted in 2010 , however, following an appeal the Policy for Opportunity Site Bromley North was quashed. Since this time, the Council have been actively working to develop this site together with other land owners including Network Rail & Prime Place. The majority of the site falls within years 6 to 10 of the housing trajectory.	No modification.
39_7	Andrew Dorrian, Transport for London	Requires reprovision of current quantum of bus stands as a minimum.	The draft policy for the site includes a transport interchange and parking. Bus stands to be re-provided and the quantum will be determined having regard to the requirements of TFL.	No modification.
41_1	David Graham, Daniel Watney for Prime Place	<p>Residential numbers on the site should be increased to a minimum of 740 and the office element should be reduced to 500sqm.</p> <p>Strongly contest the viability work done by the Council to underpin the assessment of 525 units.</p> <p>Very detailed response relating to why the number</p>	This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		of units should increase to 740 – (lack of 5 year housing land supply, viability, historic undersupply, housing zone status, opportunity area, 2000sqm of office is unrealistic and not required...)	<p>The site lies within the proposed Bromley North Business Improvement Area and it offers the potential to provide good quality offices which would support the Business Improvement Area (BIA) and allow a mixed use development. It is considered that the proposed policy for the site supports the BIA and provides a significant amount of housing contributing to the trajectory. However, there is no evidence that the balance of use should be amended.</p> <p>The allocation is in a sustainable location and provides a suitable balance between the needs for housing and the impact on local residents.</p> <p>See also officer comments in response to the housing supply representation received from Daniel Watney.</p>	
52_1	Steve Taylor, Network Rail	Number of residential units too low. Should be 600 to 800	See response to 41_1 above	No modification.
74_1	Tom Tooley	<p>The Massing and Viability Study produced by Montagu Evans has ignored a significant number of guidelines set out in Draft Plan.</p> <p>For example - Local Plan Para 1.3.6 requires new housing to complement and respect the character on the neighbourhood in which it is located – this has not been acknowledged. The tall buildings do not enhance or respect the character of the surrounding area (draft policy 47), insufficient information on how traffic congestion is being addressed. Proposals contrary to Draft Policy 37 (general design of development) and 42 (development adjacent to a conservation area)</p> <p>Implications on infrastructure.</p>	<p>The site is considered a large enough site to define its own distinctive characteristics in accordance with the London Plan.</p> <p>Notwithstanding this, the detailed design will be assessed at planning application stage. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p>	No modification.
77_1	Steve Hancock	Objects to allocation. Development will be overbearing, infrastructure will not be able to cope. Does not respect listed building and adjacent Conservation Area.	See comments above re detailed design to be assessed at application stage.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
85_1	John Street	Development won't respect the listed buildings and Conservation Area. The development will be overbearing, will overlook, and will have an effect on local residents. Will not improve the character or quality of the local area. Infrastructure will not be able to cope with the influx of new residents.	See comments above re detailed design to be assessed at application stage.	No modification.
93_1	Keith Tonner	Tower blocks are inappropriate in a Conservation Area. Property will be blighted by lack of sunlight. Lack of privacy from development. Unacceptable disturbance from building works. Individual properties rather than flats will be more appropriate.	<p>The site is considered a large enough site to define its own distinctive characteristics in accordance with the London Plan. The site is already indicated as suitable for tall buildings in the 2010 Area Action Plan for tall buildings.</p> <p>The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre</p>	No modification.
102_1	Russel Matthusek	Objects to allocation – inappropriate scale, existing properties rights to light will be affected, inadequate infrastructure.	<p>The indicative massing studies together with the use of London Plan density Matrix demonstrate that the site can accommodate the scale of development set out in the site allocation.</p> <p>The details/design will be subject to a planning application and assessed at application stage. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre</p>	No modification.
120_1	Stuart Summers	Objects to allocation. Contradicts the thrust of the Local Plan with respect to protecting Bromley's valued environments and well-being. Endorses the Babbacombe Road Resident's Association response (and add pollutions to the knock on side effects)	See response to 41_1 above and 147_1 below	No modification.
122_3	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	How can 525 dwellings and 2000sqm office be delivered on the site without adversely impacting the listed station building and surrounding character? Deliverability is questionable and so this site should not be in housing land projections.	<p>The indicative massing studies together with the use of London Plan density Matrix demonstrate that the site can accommodate the scale of development set out in the site allocation.</p> <p>The Council with partners has undertaken work to show that the mix and quantum of uses within the site allocation area deliverable. The proposals will be expected to provide a sensitive and effective</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			<p>transition between the adjoining low rise residential areas and the higher density town centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p> <p>The Council is actively working to develop this site together with other land owners including Network Rail & Prime Place. The majority of the site falls within years 6 to 10 of the housing trajectory.</p>	
132_1	Andrew Howcroft	<p>Concerns over development at Bromley North. The opportunity to expand transport links is being thrown away. Local infrastructure needs to be upgraded to support additional demands.</p>	<p>The policy for the site allocation requires the provision of a transport interchange and as outlined earlier the local plan includes provision for schools and other provision for other infrastructure required over the plan period.</p>	No modification.
136_1	Matt Walker	<p>Objects to allocation.</p> <p>The addition of housing will pose serious issues for all residents in relation to parking, access to facilities such as doctor's surgeries / schools which will not be increased in line with the population.</p> <p>Fails to see how the proposal is in keeping with the local character. Inadequate justification of the Council's changed position.</p>	<p>The Council with partners has undertaken work to show that the mix and quantum of uses within the site allocation area deliverable. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p> <p>The Local plan includes provision for schools and other provision for other infrastructure required over the plan period. The developer will be required to mitigate against impacts upon infrastructure at the planning application stage.</p>	No modification.
140_1	Morag Hughes	<p>Objects to allocation.</p> <ul style="list-style-type: none"> • drainage concerns (flooding already occurs after heavy rain), • already a lack of local school capacity – nearest secondary school is in Lewisham, • insufficient public transport – no disabled access to Platform 1 at Grove Park, are there any plans to serve the increase in commuters which will result from the Local Plan, the transport provision needs to be upgraded to meet the additional need. • vehicular access for existing residents during 	<p>See above – re infrastructure and schools See above - planning application process regarding design outcomes, managing access during implementation</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>construction,</p> <ul style="list-style-type: none"> • parking - already an issue • design outcomes – it is not clear how the proposed development will preserve or enhance the setting. 		
146_1	David Sterling	Objects to allocation due to local amenity concerns, impact on character of the area, the infrastructure will not be able to cope, does not respect listed station building or conservation area	As above	No modification.
147_1	Patrick Holden, Babbacombe Road Residents' Association	Objects to allocation, which would contradict Draft Policy 37 – General Design of Development, Draft Policy 42 – Development Adjacent to a Conservation Area, Draft Policy 47 – Tall & Large Buildings, Historic England guidance and Draft Policy 31 – Relieving Congestion. Devt. of site in advance of any DLR expansion decision would be premature. Local Plan lacks reasonable alternatives, as per NPPF test of soundness. Suggests Local Plan should make clearer statements on devt. limits at present consultation.	<p>This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.</p> <p>The indicative massing studies together with the use of London Plan density Matrix demonstrate that the site can accommodate the scale of development set out in the site allocation.</p> <p>The Council with partners has undertaken work to show that the mix and quantum of uses within the site allocation area deliverable. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p>	No modification.
151_2	Ann Garrett for Bromley Friends of the Earth	Insufficient evidence to justify allocation, in terms of infrastructure capacity, sensitive design, treatment of listed station building and parking.	The Council with partners has undertaken work to show that the mix and quantum of uses within the site allocation area deliverable.	No modification.
156_2	Karen Weekes and Keyna Mendonca	Supports BRRA representation. In addition, access to light will be affected, 17 storeys is out of keeping with Bromley planning ethos, allocation site would cause design conflicts. Should be supported by independent architectural and building advice – the construction of building could impact on structural integrity of surrounding residences. Concerns over deliverability,	The policy sets out the quantum and mix of uses to be accommodated on the site reflecting its position within an Opportunity Area, Metropolitan Town Centre, and proposed BIA and its proximity to lower density residential areas, and the listed Bromley North station.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		considering Brexit. Inadequate infrastructure capacity already.		
158_1	Tonina Hoang	No evidence to demonstrate allocation is appropriate in terms of character, infrastructure and parking. LBBs own evidence presented suggests much smaller development.	<p>The indicative massing studies together with the use of London Plan density Matrix demonstrate that the site can accommodate the scale of development set out in the site allocation.</p> <p>The Council with partners has undertaken work to show that the mix and quantum of uses within the site allocation area deliverable. The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p> <p>The Local plan includes provision for schools and other provision for other infrastructure required over the plan period. The developer will be required to mitigate against impacts upon infrastructure at the planning application stage.</p>	No modification.
160_1	Chris Burton	Dwelling yield is over ambitious, considering existing limited infrastructure capacity (schools, doctors, water, and public transport infrastructure) How will the area cope with such a large influx of residents?	See above re infrastructure	No modification.
161_1	Giorgio Ricci	Lack of evidence demonstrating how proposed housing will be supported by improved infrastructure, education and health capacity. Allocation will impact on listed station building. Cannot call Bromley North a village with the proposed site allocation.	As noted in the London Plan Para 3.42, large sites have the potential to define their own characteristics and accommodate higher density development in line with Policy 3.4 .	No modification.
169_2	Tim Hayward	The Holder Mathius modelling study demonstrates that the proposals are unsound as the housing and office target figures are unrealistic in terms of policy relating to this sensitive location which is the setting of both designated and non-designated heritage assets. Objects to the allocation as not “consistent with achieving sustainable development”. Not justified	The proposed allocation reflects the position of the site adjacent to small scale domestic dwellings, the listed station building and its location within an Opportunity Area, Metropolitan Town Centre and proposed BIA.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>and the plan not positively prepared. The AAP Inspector's conclusion that the historic buildings environmental issues are the determining factor for Site B rather than the target figures should be the model for this site also. There should be independent historic building advice brought to bear now rather than at a planning applications stage</p>	<p>Historic England have been consulted as part of the local plan process and the Council's Conservation Officer.</p>	
177_1	Mr Clive Lawrance	<p>Concerns over legality of proposed development at Bromley North. It is not sound or justified.</p> <p>No study has been undertaken on the impact on parking and transport or on the provision of additional services that will be required to meet the additional residents. The existing residential areas are classed as suburban and the proposed development will not provide a sufficient buffer between suburban and urban. It is not appropriate to build high rise adjacent to low rise dwellings. Impact on existing residents during construction. Increase in pollution.</p>	<p>Studies to date do include provision of car parking on the site to serve both residential and transport interchange needs.</p> <p>The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density ton centre, whilst respecting and enhancing the setting of the Grade two Listed Building.</p>	No modification.
179_1	Mrs Caroline Ishojer	<p>Draft Plan does not meet requirements of respecting or complimenting local character. The proposal is more suited to family housing, not high rise. Infrastructure won't be able to cope.</p>	<p>The site is a large site and considered large enough to define its own characteristics and create its own distinct character whilst complementing the existing local character.</p> <p>The proposed allocation seeks to balance the London Plan, and NPPF requirements, the BTCAAP, the role the site can play given its location within an Opportunity Area , Metropolitan Town Centre and proposed Business Improvement Area and the variety of the adjoining buildings' scale and character. See above re infrastructure.</p>	No modification.
180_1	GP Zambrini	<p>Massing study not in accordance with other LP policies. e.g. policy 37 which states that development should "complement the scale, proportion, form, layout and materials of adjacent buildings and areas" and "Positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features" and "respect</p>	<p>See above. The site is a large site and in accordance with the London Plan can define its own characteristics.</p> <p>The proposals will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density ton centre, whilst respecting and</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>the amenity of occupiers of neighbouring buildings and those of future occupants [...] and ensuring they are not harmed by [...] privacy or by overshadowing”</p> <p>Also not in accordance with policy 42, or 47. Lack of evidence to justify the proposal for 525 units at the site. The evidence provided both now in support of this Local Plan and previously at the High Court against a similar plan would strongly suggest that only a much smaller development would be appropriate in this location</p> <p>The viability analysis has not been produced for public scrutiny. Impact on parking. Transport Impact assessment has not been conducted. Any development in advance of a decision on the DLR extension would be premature.</p>	<p>enhancing the setting of the Grade two Listed Building.</p>	
181_5	Mr Peter Martin, Bromley Civic Society	<p>Not sound, positively prepared, justified or effective.</p> <p>Proposals are unsound as they are unachievable and conflict with NPPF and proposed policies in Draft Local Plan.</p> <p>The development and infrastructure requirements have not been properly and objectively assessed. The Montagu Evans presentation 2016 did not take sufficient account of heritage assets. A Heritage Assessment should be undertaken and the impact of a range of heights should be assessed for their impact on nearby heritage assets and as viewed from a variety of viewpoints</p> <p>The need for further assessments is particularly important given the prospect of site allocations in the Local Plan providing for a Permission in Principle under regulations that are imminently due to be laid pursuant to the Housing and Planning Act 2016. Such regulations would provide that site allocations in new Local Plan documents are effectively granted in principle, with only technical details required to follow</p>	<p>This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.</p> <p>The Site will balance the requirements of the Opportunity Area a Metropolitan Town Centre and Business Improvement Area, while being sensitive to the variety of adjoining building types and uses.</p> <p>The planning application process will require details of the impact on the heritage assets. It will provide for the long term conservation of heritage assets on the site.</p>	No modification.
195_1	Bo Ishojer	<p>The proposal is not in keeping with the surrounding area and family houses should be</p>	<p>See above.</p>	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		considered instead.		
Housing mixed use Site 3 - Hill Car Park and adjacent lands				
28_4	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	
30_9	Mr Hough - Sigma Planning Services for South East Living Group	It has not been demonstrated that 150 dwellings can be provided whilst retaining the carpark. It is questionable whether the concept can be achieved.	<p>This site has been shown for residential development so as to contribute towards the Housing Supply target of the London Plan Policy 3.3 of 641 per annum and because it meets the policy and sustainable development requirements of the NPPF, the London Plan and the Local Plan. Other sites have not been selected such as Green Belt and designated open space sites.</p> <p>The car park is in need of major investment in the future and is in a highly sustainable location. It is a clear opportunity for a mixed development including re-provision of car parking and additional dwellings. There are site constraints but these are recognised in the provisos of the allocation and in the number of dwellings included relative to London Plan densities.</p>	No modification.
122_6	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	The car park provides 752 spaces for the town centre. In the absence of a sustainability appraisal or any detailed evidence base it is unclear how the proposed development will impact on the vitality and viability of the town centre. There is no acknowledgement as to how the development will respond to the heritage assets surrounding the site.	See response to 30_9 above.	No modification.
166_1	Robert Gregory Bromley North Traders Association	Objects to the lack of detail regarding public parking capacity – will the existing car park be demolished? Will there be a new car park? Why has an approximation of size/capacity not been given? A Public/community car park should be at the heart of the design to support national policy for High Streets and “High Street Britain 2005” report.	See response to 30_9 above.	No modification.
169_3	Tim Hayward	There is no evidence presented that the target figures can be achieved without loss of car parking, without loss of the cinema, or without adverse impact on the Local Green Spaces.	See response to 30_9 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>The proposal is not positively prepared or justified. The proposed target figures which are likely to mean environmentally harmful overdevelopment cannot be regarded as meeting the NPPF requirement as: “the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence” as no reasonable alternatives have been shown to have been explored. (i.e. reasonable in terms of the statutory consideration of preservation and enhancement of the setting of the adjacent Conservation Area or listed and locally listed buildings)</p> <p>If the cinema is to be lost then this is contrary to the stated aim of the AAP to “encourage new facilities whilst resisting the change of use or redevelopment of existing theatres, live music venues and other existing entertainment facilities to accommodate other uses within the town centre. Proposals for the redevelopment of existing facilities will be required to include appropriate provision of entertainment facilities within redevelopment proposals” also contrary to policy BTC 7.</p> <p>The representation suggests that the cinema should be excluded from the proposal and included within the town centre conservation area.</p>		
181_8	Mr Peter Martin, Bromley Civic Society	<p>The Proposals are unsound because there is no evidence presented that the above target figures can be achieved without loss of car parking, without loss of the cinema or adverse impact on the Local Green Spaces which by their inclusion within the Town Centre Conservation area already require the “preservation or enhancement of their character or appearance” in terms of views into and out of the area and impact on the setting</p> <p>The proposals are not positively prepared - there is a lack of any evidence that the proposals can be achieved within the planning constraints of the site.</p>	See response to 30_9 above.	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>The proposal is not justified - no reasonable alternatives have been shown to have been explored. (i.e. reasonable in terms of the statutory consideration of preservation and enhancement of the setting of the adjacent Conservation Area or listed and locally listed buildings) , and not consistent with national policy.</p> <p>The loss of the cinema and leisure facility which is implied is contrary to the stated aim of the AAP and Policy BTC7</p> <p>The proposal is contrary to national policy - do not therefore take adequate account of and respond to local character, history and identity.</p> <p>The need for a proper assessment of the site is particularly important given the prospect of these site allocations providing for a Permission in Principle on these sites under regulations that are imminently due to be laid pursuant to the Housing and Planning Act 2016</p> <p>The representation puts forward a number of recommendations which include – to recognise the cinema as a heritage asset, exclude cinema from proposals.... (see rep)</p>		
186_1	Keith Ashcroft, Hill House Bromley Management Ltd	Seeking assurances that current access to and from Hill House Mews has been fully taken into and no changes that are detrimental are being considered.	Access to Hill House will be fully taken into account within any scheme.	No modification
Housing mixed use Site 4 - Gas holder site, Homesdale Road				
28_5	Richard Hill, Thames Water	The water network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing water network infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. The developer is encouraged to work Thames Water early on in the planning process to understand what infrastructure is required, where, when and how it will be delivered.	Noted.	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.		
44_1	Stephanie O'Callaghan, Quod for Scotia Gas Networks	<p>This revised allocation is positive as it allows for a greater degree of flexibility for alternative, higher value uses on the site, compared to the existing 'Business Area' designation within the Adopted UDP (2006), and the Draft Allocations, Further Policies and Designations Document which was out for consultation in September (2015), which allocated the site for solely residential uses. SGN are supportive of this revised allocation. The widening of this allocation to include uses such as for bulky trade operators or others where there is a need helps to create the flexibility required for the site to be brought forward for redevelopment.</p> <p>It is crucial that the maximum possible flexibility is available regarding the future use of the Bromley Gasholder site so that a wide range of uses can be accommodated for future redevelopment.</p>	Support welcomed.	No modification
63_1	Jonathan Best, Montagu Evans for Travis Perkins	<p>Travis Perkins continues to support the allocation of the site for mixed use residential and employment floorspace, however they object to the following:</p> <ul style="list-style-type: none"> - It is not clear how the requirement for 60 residential units will be achieved in a mixed use allocation (the figure should be deleted). - It is unreasonable to require a "complete" remediation of the site, so a suggested amendment to the site allocation in the appendix is "Ensure complete remediation of contaminated land", which will ensure remediation is undertaken to appropriate standards. <p>Finally, as the gas holders are no longer in use, it is considered that the site is capable of coming forward in years 1-5.</p>	<p>Following an assessment of the site constraints and in light of the London Plan 'Sustainable residential quality (SQR) density matrix, it is considered that the site can be developed to provide 60 residential units and employment floorspace (no figure) within the 6 – 10 year timeframe.</p> <p>Remediation of contaminated land within the site is required. A minor modification may address the concern about the degree of remediation whilst ensuring that the contamination of the whole site is addressed as intended "Ensure complete <u>appropriate remediation of contaminated land on the site is completed</u>",</p> <p>Developers are free to submit applications at any time and, subject to achieving planning permission which will be considered in light of the development plan, could commence development in years 1-5.</p>	<u>Minor modification</u>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
65_3	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	<p>In the draft Site Allocations document, the Council propose to remove the LSIS designation as the majority of the site is occupied by a supermarket. Although the site's LSIS designation is subject to removal, its current condition, access issues and flood risk will impact upon its deliverability.</p> <p>Both existing gas holders and the surrounding land will require decontamination and significant remediation works which present significant and costly barriers to overcome before any redevelopment takes place. As a result, it is likely that the scheme will not be financially viable.</p> <p>Furthermore, the site is situated within Flood Zone 2 and is at high risk of flooding. Redevelopment would be required to include flood mitigation measures, which may reduce the developable space within the site. These limitations will significantly restrict the development potential of the site, and as such, it is likely that the site is not in a position to deliver a mixed use development including 35 to 75 residential units.</p>	<p>The UDP Business Area designation is to be deleted (including the proposed allocation and the area to the south occupied by a supermarket). A separate LSIS is proposed at Waldo Road (south of the railway tracks)</p> <p>The owners of the land confirm that they expect the site to be delivered within the next 5-6 years and support the 'mixed use/residential' allocation in principle.</p> <p>Specific design techniques can be adopted by developers to mitigate flood risk concerns.</p>	No modification
122_7	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	<p>The Gas Holder allocation proposes to deliver 60 units on contaminated land. LBB has not demonstrated that such a scheme would be deliverable from a viability perspective. The decommissioning and remediation of former gas holders is expensive and viability is likely to be a significant constraint to any development. Without understanding the costs of remediation, LBB cannot be satisfied that this site will realistically come forward for residential development. Furthermore, the viability of any scheme may restrict the amount of affordable housing the development could deliver.</p>	As above.	No modification
Housing Site 5 - Land adjacent to Bickley Station				
28_6	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
52_2	Steve Taylor, Network Rail	The site has the potential to deliver a greater number of residential units than that suggested in the consultation draft. The site has the capacity for approximately 50 units. The low number of	Following an assessment of the site constraints and in light of the London Plan 'Sustainable residential quality (SQR) density matrix, it is considered that the site can be developed to	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		proposed units does not comply with the FALP density guidance, nor does it properly appreciate the development potential of the site.	provide around 30 residential units. It is open to developers to submit applications as they see fit and these will be determined on their individual merits in accordance with planning policy and legislation.	
65_2	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	<p>The viability of the site for continued employment use would need to be assessed by Network Rail to enable redevelopment of the site for a solely residential scheme.</p> <p>Redevelopment of the site will also have to overcome layout issues presented by the site's narrow shape, particularly with regards to access. Entry to the site from Southborough Road will also need careful consideration with a suitable design required in order to meet access needs whilst making best use of the site's narrow shape.</p>	<p>The proposed allocation, which does not require provision for employment, relates to the 6 – 10 year timeframe.</p> <p>All submitted proposals will have to follow policies in the Plan, such as Draft Policy 37 – General Design of Development, to ensure developments meet a number of criteria, including suitable access.</p>	No modification
Housing mixed use Site 6 - Bromley Valley Gym				
28_7	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
30_10	Mr Hough, Sigma Planning Services, on behalf of South East Living Group	The practicality of providing 200 new dwellings to meet quality standards & avoid the loss of sports facilities has not been adequately demonstrated.	Following an assessment of the site opportunities and constraints, and in light of the London Plan 'Sustainable residential quality (SQR) density matrix, it is considered that the site can be developed to provide around 200 residential units alongside the reprovision of St Paul's Cray Library, community uses and the Bromley Valley Gym facilities.	No modification
65_5	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	Main concern with the redevelopment of the site, & the allocation, is the achievability of 200 residential units in addition to the various other components of the scheme. The majority of the neighbouring dwellings are two and three storey semi-detached and terraced units in a largely suburban area with a PTAL score of 2. It would be difficult to achieve 200 units, in addition to a new larger gymnastics centre and library, without creating a scheme which is of a significantly greater density than the surrounding area, whilst losing the open and green character of the site towards the rear. As such, the scheme could not deliver the quantum of residential units proposed.	<p>This corner site lying at the bottom of a steep hill is set within an area of mixed styles ranging from tower block to two and three storey development.</p> <p>Whilst optimising development designs will be expected to meet the criteria set within the policy in appendix 10.2, notably the need to respond sensitively to the existing residential neighbourhood</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
122_5	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	The allocation for 200 homes is ambitious given the developable area of the site will be limited by LBB's requirement to re-provide the existing community and leisure facilities and the relatively low density character of the surrounding area. We consider 100 new homes on the site to be more realistic so as to allow the provision of existing facilities and provide an appropriate scale and form of development compatible with the suburban surroundings.	As above	No modification
58_1	Dale Greetham, Sport England	Objects to allocation which contradicts Sport England's aims to prevent the loss of sports facilities. Planning Policy Objective 1 within Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' aims to prevent the loss of sports facilities and land along with access to natural resources used for sport.	This proposal does not involve any playing fields nor change in designation. It is assumed that the objection concerns a loss of the Bromley Valley Gym facilities. The 'Site policy' includes the re-provision of a gymnastics centre on this proposed mixed use site, so there would be no loss of sports facilities here.	No modification
Housing Site 7 - Orchard Lodge				
28_8	Richard Hill, Thames Water	<p>The supply required for the proposed scale of development is a significant additional demand in the Water Resource area. Currently the mains that feed the Water Resource area are running close to or at capacity. Consequently it is likely that the developer will be required to fund an impact study of the existing infrastructure for the brownfield sites and smaller infill development in order to determine the magnitude of spare capacity and a suitable connection point. The developer will be required to fund this. As set out in the Planning Policy Guidance, early contact with statutory undertakers (such as Thames Water) is recommended.</p> <p>On the information available, we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	Noted.	No modification
122_8	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	This allocation has already obtained planning permission and therefore, its value is questionable as an allocation within the emerging policy document.	<p>The NPPF states that "deliverable" sites such as this are suitable for inclusion in the housing land supply calculation.</p> <p>Work on the local plan & site allocations began years prior to planning permission being granted; therefore this site still contributes to the housing</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			stock targets.	
163_2	Michael Lebbie	Object to the proposed plan due to health & safety grounds. Concerned about the level of floors of the development, as it does not conform to the other properties in the neighbourhood. Five or six floors will be too high and overlook the school nearby, which could be a risk to health & safety. Moreover, there is insufficient parking proposed for residents which will further exacerbate the parking difficulty in the area. Residents will continue to fight any changes to the status quo.	<p>Following an assessment of the site constraints and in light of the London Plan 'Sustainable residential quality (SQR) density matrix, it is considered that the site will deliver around 30 residential units.</p> <p>Proposals submitted for this site would be required to considered the impact to ensure minimal overlooking of the nearby school. Draft Policy 37 ensures that any development proposals respect the amenities of neighbouring buildings & their occupiers. On the matter of parking, Draft Policy 30 requires enough off-street parking spaces for new developments (depending on the PTAL of the area & the number of bedrooms in each property).</p>	No modification
Housing Site 8 - Bassetts Campus				
28_9	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
38_4	Alice Roberts, CPRE London	The inclusion of the area of Site of Importance for Nature Conservation (SINC) within the development boundary endangers a site of importance for local wildlife. The boundaries should be altered to exclude the SINC to ensure that there is no impact on the green space.	Including the SINC as part of the development site will better ensure that any proposal will incorporate it within the design process. When an application is submitted, Natural England and other interested parties would be consulted.	No modification
59_3	Matthew Frith, London Wildlife Trust	The inclusion of the area of SINC within the development boundary endangers a site which supports species including great crested newt which relies on a network of appropriate natural habitat extending 500 metres beyond that of the breeding pond. The boundaries should be altered to exclude the SINC. We recognise the policy commitment in Appendix 10.2 but recommended it amended to " <i>address the site-wide Tree Protection Order [and] protect and enhance the Bassetts Pond SINC and the species requirements for which it supports.</i> "	Including the SINC as part of the development site will better ensure that any proposal will incorporate it within the design process. When an application is submitted, Natural England and other interested parties would be consulted. As far as the trees are concerned, with a TPO covering the site, appropriate surveys by the applicant would be required for submission with the application. It is not considered necessary to make amendments to the Site policy suggested by the consultee.	No Modification
65_6	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	Aware that the site was subject to a withdrawn outline planning permission for 99 units in 2014, whilst prior approval was recently granted for the conversion of Bassetts House into 12 residential	Any new housing development will be required to follow policies, such as Draft Policy 4 – Housing Design & Draft Policy 37 – General Design of Development, that make sure proposals	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>units (Ref: 14/03236/RESPA). Having reviewed the proposed scheme by the London Square Developments Ltd, it is believed that the provision of a further 91 units around Bassetts House will result in the overdevelopment of a sensitive site.</p> <p>Bassetts House is also a locally listed building, which acts as the primary building within the site both in terms of its prominent position along Starts Hill Road, and its dominant height over the neighbouring one and two storey dwellings within the site. Furthermore, the surrounding area is predominately residential in character, comprising largely of two storey semi-detached dwellings.</p> <p>The most recent scheme proposes the erection of several three storey buildings adjacent to the locally listed Bassetts House, and the erection of several units within close proximity to the ecologically sensitive pond. It is believed that this will have a detrimental impact upon both the heritage and environmental assets within the site, resulting in a scheme which is incongruous with the surrounding suburban setting. As a result, the deliverability of the site for this quantum of units is questionable as it is unlikely that 100 units could be achieved on the site without significant harm to its existing character.</p>	<p>complement the existing area/properties. The site allocation for Bassetts Campus, found in the appendices of the Plan, also confirm that any proposal would be expected to protect the locally listed Bassetts House and other features of the site, such as the Bassetts Pond SINC. It is also important to note that the 100 residential units suggested for the site is not a requirement and is dependent on what proposals are submitted to the Council.</p>	
122_9	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	This allocation has already obtained planning permission and therefore, its value is questionable as an allocation within the emerging policy document.	Work on the local plan & site allocations began years prior to planning permission being granted; therefore this site still contributes to the housing stock targets.	No modification
Housing Site 9 - Former Depot, Bruce Grove				
28_10	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
65_7	Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust	<p>The site is in close proximity to neighbouring buildings including a five storey building adjacent the site fronting the High Street. The proximity of listed buildings on the site and large buildings adjacent to the site would have an impact on the quantum of development on the site.</p> <p>Additionally, the site is located within Flood Zones</p>	<p>The nature of the development will be subject to a viability study to ensure that the proposal can be achieved. Costs such as remediation or flood mitigation are subject to the proposals put forward to the Council and design techniques can be adopted by developers to alleviate these issues. The allocation for 30 units is not a requirement and was suggested as to give an idea of how</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>2 and 3, with a risk of surface water flooding, whilst the northern area of the site is situated within the setting of a Grade II listed building and is partially located within a Conservation Area and an Area of Archaeological Significance. As the previous use of the site was industrial, the site may contain contaminated land which would require the provision of remediation works prior to redevelopment. Such constraints will further inhibit the development potential of the site, and reinforce our concerns regarding the acceptability of the site for redevelopment. As such, we estimate that the site could not deliver the number of units proposed.</p>	<p>many units could feasibly fit onto the site.</p>	
Housing mixed use Site 10 - West of Bromley High Street				
28_11	Richard Hill, Thames Water	<p>Concerns regarding Water Supply Capability in relation to this site. The water supply network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for Thames Water to undertake investigations of the impact of the development and completion of this will take several weeks. It should be noted that in the event of an upgrade to the assets being required, up to three years lead in time will be necessary. In this case Thames Water asks that the following paragraph is included in the Development Plan: <i><u>“Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.”</u></i></p> <p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development, so strategic drainage infrastructure is likely to be required to ensure sufficient capacity ahead of the development. Where there is a wastewater network capacity constraint, the developer should</p>	<p>The suggested paragraph can already be found in the Local Plan, in para. 7.0.35 of the supporting text of Draft Policy 117.</p> <p>Para. 7.0.37 mentions that developers should consult with the infrastructure provider (in this case Thames Water) as early as possible regarding the capacity of water & wastewater infrastructure to serve development proposals. All development is required to provide for the necessary infrastructure to support and service it,</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		liaise with Thames & provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when & how it will be delivered.	in accordance with Draft Policy 125.	
30_11	Mr Hough, Sigma Planning Services, on behalf of South East Living Group	The site is in many different ownerships and it is questionable whether the site can be assembled within the Plan period – if at all.	The housing allocations specified for the Plan period were chosen using the methodologies of several London-wide documents, including the London Plan, the GLA Housing SPG, the NPPF, the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment. These documents help form the evidence base for why Bromley's site allocations in the Local Plan are appropriate and justified. The Council has a development partner in place for the first phase of this site allocation. The further phases of the site are identified for Years 11-15 of the plan.	No modification
39_8	Andrew Dorrian, Transport for London	TfL is keen that when considering the future of this site, bus standing provision is included. The site includes and is adjacent to Bromley South station and when developing the site, the interchange should be enhanced.	The Council agrees with this response and will work with TfL, as laid out in policies such as Draft Policy 35, titled 'Transport Investment Priorities'.	No modification
41_3	David Graham, Daniel Watney for Prime Place	<p>Do not consider the site to be deliverable over the plan period, and question its deliverability within any reasonable timeframe. The site comprises a considerable number of residential and commercial freeholders and long leaseholders, and currently benefits from high occupancy rates, particularly with regards to the retail elements. Each of these complications is likely to delay progress on any scheme, adding uncertainty to the potential redevelopment of the site.</p> <p>The site was discussed at the Renewal and Recreation Policy Development and Scrutiny Committee in September 2016, where it was determined that the Council would explore a first phase residential led redevelopment on the site, as market testing had shown that a retail led scheme was not viable. However, the site is situated within the primary shopping area of Bromley Town Centre, with a significant proportion of the site benefitting from a frontage</p>	<p>The housing allocations specified for the Plan period were chosen using the methodologies of several London-wide documents, including the London Plan, the GLA Housing SPG, the NPPF, the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment. These documents help form the evidence base for why Bromley's site allocations in the Local Plan are appropriate and justified.</p> <p>The site allocation for West of Bromley High Street (appendix 10. 2 of the Local Plan), identified mixed use redevelopment with residential units, offices & retail spaces. Proposals for this site would be expected to optimise its key town centre location and provide attractive & active frontage to the High Street.</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>on the High Street. Therefore, the replacement of important retail floorspace with residential accommodation would not be the most sensible option, which would reduce the capacity of the site for residential uses. Instead, the Council should be seeking to maximise residential development on alternative Town Centre sites in accordance with Part E of London Plan Policy 3.3.</p> <p>Question the Council's allocation for 1,230 units across the site. The site does not appear to have been subject to a massing study or feasibility study, nor is there any evidence to suggest that the quantum of allocated residential floorspace is achievable. Further evidence should be provided demonstrating that the site could, from a spatial perspective, deliver 1,230 units.</p> <p>By allocating the site for almost half of their opportunity area target of 2,500 homes, the Council are over-dependent on the delivery of this one site. If the site cannot be delivered, which could be the case, the number of units allocated within the town centre would be 1,547 (including Broad Locations), which is significantly below the 2,500 target. Notwithstanding this, if the HG Wells site is removed as anticipated and the Broad Locations allocation is reduced to a more realistic total (approx. 50 units), the total number of units to be delivered in the town centre over the plan period would be 1,195 units.</p>	<p>The Council is finalising the development agreement with Countryside for the first phase development on the site.</p> <p>. The later phases are identified to be delivered in years 11-15 of the plan.</p> <p>This housing allocation uses the methodologies of several London-wide documents, including the London Plan, the GLA Housing SPG, the NPPF, the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment. These documents help form the evidence base for why this site allocation is appropriate and justified.</p>	
122_2	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	<p>It is inappropriate for LBB to rely so heavily on this site, particularly given its failure to deliver or significantly progress the site over such a period of time (lack of evidence of deliverability).</p> <p>The site is in multiple ownerships & it is probable that it will be necessary to involve a large & complicated compulsory purchase of land to bring it forward. LBB has acknowledged that it will need</p>	<p>This housing allocation was chosen using the methodologies of several London-wide documents, including the London Plan, the GLA Housing SPG, the NPPF, the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment. These documents help form the evidence base for why this site allocation is appropriate and justified. The nature of the</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>a development partner to support & fund this process, but it has not presented any evidence that such a joint venture is likely to come forward. The Inspector's report to the BTCAAP suggested that in order for this scheme to progress, more work would be required by LBB and that it would need to prepare a masterplan to aid development. LBB has not undertaken this work, but it seeks to continue to rely on the site to demonstrate a long-term housing supply. Even if LBB were to identify a development partner in the short term, the legal complexities of the compulsory purchase, along with the site preparation works means that it is not likely to deliver anywhere near 1,230 homes even over a 15 year period.</p>	<p>development will be subject to a viability study to ensure that the proposal can be achieved.</p>	
151_1	Ann Garrett for Bromley Friends of the Earth	<p>There is insufficient evidence to justify the Site 10 proposal with respect to:</p> <ol style="list-style-type: none"> 1. Sufficient local open space and play area, 2. Sufficient provision for local schools, 3. The clear and irreversible impact on the Conservation Area e.g. any new building so close to Church House Gardens would impinge on the seclusion of the present 'green' environment. 4. The completely unjustifiable loss of local housing e.g. in Ethelbert Close, and the destruction of a local community. 	<p>. Draft Policy 4 requires new housing development to demonstrate the provision of appropriate play space in accordance with the Mayor's Play and Informal Recreation SPG. Draft Policy 59 outlines that the Council will seek, where possible, to secure improvements in the amount, distribution and access to open space in areas of deficiency identified by the Council.</p> <p>2) Section 3.3 of the Local Plan sets out all of the justifications regarding sufficient school places. All of the education policies have been crafted using future population projections, that take into account the site allocations included in the Plan.</p> <p>3) Draft Policy 41 describes that the Council will require new developments within a Conservation Area to preserve & enhance its characteristics & appearance by respecting & incorporating the design characteristics of the existing buildings and spaces. This policy ensures negative impacts of new development on conservation areas are limited as much as possible.</p> <p>4) The loss of a limited amount of housing will allow for 1230 residential units to be built, which would help deliver these much needed homes. .</p> <p>- Draft Policy 37 highlights the fact that all development proposals will be expected to complement the scale, proportion, form, layout and materials of adjacent buildings and areas,</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>Do not think that Sites 2 & 10 of the Local Plan are sound because:</p> <ul style="list-style-type: none"> - They would have an unacceptable impact on the town centre's local character, and - would be in conflict with the heritage, historical value and treasured open spaces which are the town's greatest asset. - The plan is unsound because it is in conflict with its own draft policies within the Local Plan and that within the NPPF. <p>Bromley Friends of the Earth believe the Local Plan to be unsound in that it would have:</p> <ul style="list-style-type: none"> - A detrimental effect and encroachment on the Bromley Town Centre Conservation Area. - A severely adverse effect on the environment, by putting pressure on community facilities, transport, traffic, and parking. - A worrying & serious health impact on air & noise pollution, an effect on wildlife in local parks adjacent to new buildings, the water table and ecosystem. - A substantial and irreversible alteration of the skyline of Bromley Town Centre which has already been scarred by oppressive high-rise buildings at Bromley South and in Ringers Road and which are now proposed for the Bromley North Station site, Ethelbert Close and the HG Wells Centre site . There has so far been little 	<p>therefore preventing any unacceptable impacts on the town centre's local character. These developments will also have to respect the amenity of occupiers of neighbouring buildings.</p> <ul style="list-style-type: none"> - Any proposal submitted for this site allocation would have to respect any designated or non-designated heritage assets, as well as existing landscape features (e.g. local open spaces) (Draft Policy 37). - Section 1.2.16 of the Local Plan states that the Plan has been prepared to be in conformity with the NPPF and follows all of the guidelines the NPPF sets out. - Draft Policy 41 describes that the Council will require new developments within a Conservation Area to preserve & enhance its characteristics & appearance by respecting & incorporating the design characteristics of the existing buildings and spaces. This policy ensures negative impacts of new development on conservation areas are limited as much as possible. - The Local Plan contains many policies throughout that focus on protecting the environment, particularly in the Valued Environments & Environmental Challenges chapters. Section 1.3.18 in the Introduction states that new development will be designed in such a way as to not worsen any environmental problems. - Draft Policy 119 on noise pollution & 120 on air pollution highlight that any proposals that could cause adverse impacts on pollution /noise levels will have to submit relevant assessments to identify issues and introduce appropriate mitigation measures. Section 5.3 – Nature Conservation & Development describes that its policies aim to protect the sites and features which are of ecological interest and value. Draft Policy 70, for example, requires developments to include suitable mitigation measures if wildlife features may be affected by development. - Draft Policy 47 describes how the Council will 	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>effort in designing buildings which adhere to the policy that developments 'should complement the scale, proportion, formal layout and materials of adjacent buildings and areas'.</p> <ul style="list-style-type: none"> - A disappointing impact in failing to enhance and preserve the fine heritage and historical qualities of the town, and the destruction of beautiful vistas and views. - A serious impact in destroying the confidence of caring long term & new residents due to the absence of a Masterplan as required by the Area Action Plan, and who have seen piecemeal development in all areas of the Borough for years. - A concerning impact due to a lack of understanding of what constitutes real 'sustainability' & finally a lack of meaningful public consultation in coming to planning decisions. 	<p>require proposals for tall & large buildings to make a positive contribution to the townscape, ensuring their massing, scale and layout enhances the character of the surrounding area.</p> <ul style="list-style-type: none"> - Fine heritage & historical qualities of towns in Bromley are protected through several policies, including Draft Policy 47, which requires the architecture of tall/large buildings to be appropriate to their local location (following Historic England guidance). - Section 6.2.9 mentions that the Bromley Town Centre Area Action Plan will be receiving a review and a separate Opportunity Area Planning Framework will be prepared to help clarify current plans. - A definition for the term 'sustainable development' is included in the glossary of the local plan and any proposals put forward would be scrutinised by the Council to ensure sustainability was achieved. In regards to public consultation, Bromley Council is following all the procedures that dictate the process of crafting a Local Plan, such as Regulation 19 of the Town and Country Planning Regulations 2012. 	
128_1	Davina Misroch	Same as above.	Same as above.	Same as above.
152_6	John Street for Bromley Green Party	Same as above.	Same as above.	Same as above.
169_4	Tim Hayward	<p>Same as above.</p> <p>Additionally, the proposals for site 10 are unsound because the Local Plan provides no massing studies, viability or environmental assessments that demonstrate how a sustainable development of 1230 dwellings can be achieved. Development of the site on this scale is likely to undermine quality of life, contrary to para 69 of the NPPF.</p>	<p>Same as above.</p> <p>The assessments to demonstrate sustainable development will be produced once proposals are put forward for the site, as outlined in such draft policies as 120 - Air Quality. On the matter of quality of life, the Local Plan contains many policies that require developers to consider community & quality of life into their design, for example, Draft Policy 21 states that the Council will encourage developments to develop community 'hubs', providing a range of social infrastructure & opportunities for social cohesion.</p>	<p>Same as above.</p> <p>No modification</p>
181_4	Mr Peter Martin, Bromley Civic Society	<p>Same as above.</p> <p>Additionally:</p>	<p>Same as above.</p> <p>- Draft Policy 42 will ensure that when proposals</p>	<p>Same as above.</p> <p>No modification</p>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>- Proposals for the northern part of the site on the southern boundary of Library Garden in the conservation area will inevitably cause a loss of sunlight on the most accessible and popular open space amenity in the town. This would inevitably result in further conflict with draft policy 42.</p> <p>- The proposals for Site 10 are contrary to Para 58 of the NPPF (Requiring Good Design), which states that design policies "should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics". It goes on to state, "[proposals should] ... respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation."</p> <p>- Bromley Civic Society submit that both site policies/allocations are not supported by an adequate evaluation of the defining characteristics of these areas and do not therefore take adequate account of and respond to local character, history and identity, contrary to national policy.</p> <p>Furthermore, both site policies/allocations are contrary to the requirement in the Core Planning Principles of the NPPF to "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings" as the proposals at the quantum proposed will over power neighbouring residential areas which are mostly formed of modest residential properties, & an evidence base has not been produced to demonstrate otherwise.</p> <p>- No development should take place anywhere on Site 10 until a masterplan (as required by the Bromley Town Centre Area Action Plan) is prepared showing how Site 10 as a whole can be developed sustainably without giving rise to the problems referred to above. This is particularly important in view of the prospect of these site allocations providing for a Permission in Principle under regulations that are imminently due to be laid pursuant to the Housing and Planning Act 2016. Such regulations would provide that site</p>	<p>are eventually submitted for this site, developers will have to be able to demonstrate how they will preserve/enhance the setting of the adjacent conservation area; otherwise these proposals will not be able to proceed.</p> <p>- Draft Policy 37 directly correlates to para 58 of the NPPF, as the policy lists how developments will be expected to complement the scale, proportion, form, layout and materials of adjacent buildings/areas, and additionally states that developments must respect important views, heritage assets, skylines, landmarks, landscape features. Draft Policy 4 echoes these points by mentioning that new housing developments will be expected to compliment the qualities of the surrounding areas.</p> <p>- As proposals have not been put forward yet, it is hard to predict what form the developments will take, however policies such as Draft Policy 37 ensure that any development takes into account local character/identity into their design/architecture by complimenting the scale, proportion, form, layout and material of adjacent building and areas. Fine heritage & historical qualities of towns in Bromley are protected through several policies, including Draft Policy 47, which requires the architecture of tall/large buildings to be appropriate to their local location (following Historic England guidance). Draft Policy 37 also expects developments to respect the amenity of occupiers of neighbouring buildings. Draft Policy 4 is also relevant as it states that any new housing development must achieve a high standard of design. Evidence to demonstrate that any development will conform to all the relevant policies will be required by developers before any proposal would be approved.</p> <p>- Section 6.2.9 mentions that the Bromley Town Centre Area Action Plan will be receiving a review and a separate Opportunity Area Planning Framework will be prepared to help clarify current plans. On the matter of permission in principle, the new consent route would not replace the need to</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>allocations in new Local Plan documents are effectively granted in principle, with only technical details required to follow. This raises further the importance of proper scrutiny of the site allocation policies at the plan making stage as this will be the only opportunity to examine fundamentals such as land use mix and quantum. Unable to do that here on these site allocation policies as a proper supporting evidence base has not been provided to justify these policies and they should not be adopted without such an evidence base which has been consulted upon and properly scrutinised. Such an opportunity for scrutiny will no longer be provided at the full planning application stage, as in the past.</p>	<p>consider development properly against the National Planning Policy Framework and local policy. As outlined in the supporting text of Draft Policy 1, the anticipated sources of housing supply over the Plan period were chosen using the methodologies of several London-wide documents, including the London Plan, the GLA Housing SPG, the NPPF, the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment. These documents help form some of the evidence base for why Bromley's site allocations in the Local Plan are appropriate and justified.</p>	
196_1	Davina Misroch for Friends of Community G	<p>Same as above.</p> <p>Additionally:</p> <ul style="list-style-type: none"> - It is contradictory with LBB's stated policy that it is committed to ensuring that height and density of new development is, wherever possible, kept to a minimum, but is allowing the construction of two high-rise blocks at the top end of Site 10 which would fail all relevant policies. Also, in backing onto the Conservation Area, these buildings would likely detract from views in or out of the area and would fail to preserve or enhance its setting. - Policies should be sought to deliver sustainable development throughout the town i.e. make efficient use of sites without resorting to high-rise and developments which are harmful to the important characteristics of the town. 	<p>Same as above.</p> <ul style="list-style-type: none"> - Any proposals submitted to the council for tall buildings will be strictly required to conform to the relevant policies (Draft Policy 47 – Tall & Large Buildings & Draft Policy 48 – Skyline). In regards to the conservation area, any proposals will have to follow Draft Policy 42, which states that a development proposal adjacent to a conservation area will be expected to preserve or enhance its setting and not detract from views into or out of the area. - As mentioned before, any high-rise development will be required to make a positive contribution to the townscape, as laid out in Draft Policy 47. As for sustainable development, Draft Policy 37 states that developments should address sustainable design and construction and include where appropriate on-site energy generation. 	<p>Same as above.</p> <p>No modification.</p>
Housing Site 11 - Homefield Rise				
28_12	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
122_10	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	Question whether it is appropriate for LBB to look to significantly urbanise this site (stretch of family homes/suburban area) as this will result in the erosion of the suburban outer-edges of Orpington Town Centre.	This site is in a sustainable accessible location, close to the amenities of Orpington High Street and is suitable for residential development. The Council has adopted a strategy – in accordance with the London Plan and NPPF – to use previously developed land before resorting to any	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			designated open space and therefore the allocation of this site is considered appropriate.	
Housing Site 12 - Small Halls, York Rise				
28_13	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
56_1	David Morris	<p>The plan is not sound because of the extra congestion it will cause for all local residents for transport access & parking. The removal of a parking area adjacent to a main line rail station, and replacing this with a proposal which itself will require more parking spaces, is illogical.</p> <p>The council has not contacted residents of Yeovil Close, who will undoubtedly be affected.</p> <p>Yeovil Close has a pathway from the eastern end down to the station, it appears this will no longer exist should this development go ahead, which does not respect the amenity of adjoining residential properties.</p>	<p>The car park has been given a temporary permission but the site is suitable for housing development.</p> <p>Draft Policy 30 will be applicable to any development proposals. This sets out levels of parking which will be required for residential development so that they do not generate additional intrusive/obstructive on-street parking. In additional Draft Policy 32 sets out requirements for considering impacts on road safety.</p> <p>In addition to multi-media borough-wide publicity and mail-outs about the Draft Local Plan consultation, the Local Plan Team selected an area around each proposed site allocation in which it considered neighbouring properties should be <i>specifically informed</i> about the consultation process. Letters were sent to "The Householder". In the case of the York Rise site, an area of roughly 100m around the site was chosen and 115 letters sent. Part of Yeovil Close was included in this mailing.</p> <p>The exact layout of the site has not been established, the site allocation only sets out the outer boundary within which development can occur. Should Public Rights of Way cross development sites these usually need to be retained or re-directed if affected.</p>	No modification
187_1	Paul Garratt	The Proposal does not comply with Statement of Community Involvement. Several residents in York Rise were not informed of this proposal through the letter-box.	In addition to borough-wide publicity and its existing contact database, the Local Plan Team selected an area around each proposed site allocation in which it considered neighbouring properties should be <i>specifically informed</i> about the consultation process. Letters were sent to "The Householder" and representations were received as a direct result of this form of contact.	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>The site notice (30th December 2016) for use of the site as a car park does not mention housing development.</p> <p>The site is covering a prior WWII air-control hub, when asbestos may have been used in construction. This needs to be surveyed.</p> <p>Additional vehicles would further restrict vehicular access to current residents of York Rise to their own homes. York Rise is not wide enough for passing vehicles, Current infrastructure for Orpington Hill (Crofton Road) is inadequate & cluttered.</p> <p>Alternative uses for the site should be investigated</p> <p>The Duty-to-co-operate could be understood as concerning neighbouring councils & public bodies. Representation with the Rail and Bus operators, Mytime and TfL is required. Also concerns the Duty to Co-operate in Localism Act 2011 6.2 The provision of health, security, community & cultural infrastructure and other local facilities.</p>	<p>In the case of York Rise, an area of roughly 100m around the site was chosen and 115 letters sent. During the consultation period, the team were contacted by a resident who was concerned that some neighbours had not received a letter and they were subsequently informed of the consultation.</p> <p>The application for use as a car park is not related to the allocation of the site in the Draft Local Plan for housing development. A planning application will still be required for any housing development irrespective of the current or proposed use for a temporary car park.</p> <p>Draft Policy 118 outlines the remediation requirements (including a full site investigation) any applicants would have to submit to the Council before approval for a proposed development on potentially contaminated land would be granted.</p> <p>Draft Policy 30 will be applicable to any development proposals. This sets out levels of parking which will be required for residential development so that they do not generate additional intrusive/obstructive on-street parking.</p> <p>In developing the Local Plan, the Council has had to find adequate sites for housing development to allow it to fulfil its obligations under the London Plan. Sites in accessible locations such as this are important in adding to the borough's housing supply without building on open space.</p> <p>The Council has met the Duty to Cooperate. Further details are set out in the Duty to Cooperate in the Duty to Cooperate statement to be submitted with the Plan for Examination.</p>	

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Housing Site 13 - Banbury House				
8_1	Alan Spencer	Aware of 3 accidents & a fatality that have occurred at the junction of Bushell Way and White Horse Hill. Cars are parked on both sides of the road in Bushell Way & White Horse Hill, making it very busy and potentially dangerous, This will get worse with the additional planned units. Additional parking needs to be provided.	The Council will consider the potential impact of any development on road safety in line with Draft Policy 32 on Road Safety. The supporting text of this Policy states that where a proposal is situated in a location with an existing road safety problem, the applicant would be expected to fund any necessary mitigation to resolve the difficulty as far as possible.	No modification
12_1	Alasdair McAlley	<p>What is the impact of the land being owned by the NHS in terms of costs and previous land use?</p> <p>There isn't enough detail to make any meaningful feedback. What plans are there in terms of the building size and height, the style and impact analysis to public infrastructure including pedestrian and motor vehicle access?</p>	<p>The fact that Oxleas NHS Trust was the previous tenant of Banbury House is not expected to cause any additional costs or impacts to development. The Trust previously used the site as a rehabilitation unit for those suffering from mental illness, until the Trust exercised its right to break its lease and the property became available for housing. The building does not include any characteristics which could add costs to development (e.g. no significant land remediation required).</p> <p>The allocation of the site sets the principle for development but it is not considered necessary to include levels of detail which could reasonably vary – these would be set out in a planning application. Any proposals will be required to meet the requirements of other relevant policies in the plan including those for housing design, parking and amenity.</p>	No modification
15_1	Roy Beamont	<p>Strongly objects to the proposal for 25 units on this small plot, particularly if the intention is to build upwards as flats. Houses opposite would have their outlook ruined and parking would be a problem.</p> <p>A lot of vehicles already park in the road, so adding 25 or more potential vehicles would pose a major concern. White Horse Hill is too narrow to accommodate parking both sides of the road. A zebra crossing should be provided. There have already been many accidents and deaths –</p>	<p>Any development will need to demonstrate suitable density in line with the London Plan density matrix whilst respecting local character. Local Plan policies require that developments must be designed to a high quality, which complements the qualities of the surrounding areas.</p> <p>The Council will consider the potential impact of any development on road safety in line with Draft Policy 32 on Road Safety. The supporting text of this Policy states that where a proposal is situated in a location with an existing road safety problem, the applicant would be expected to fund any</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		turning out into the main road in busy traffic is very dangerous.	necessary mitigation to resolve the difficulty as far as possible.	
28_14	Richard Hill, Thames Water	No water supply capacity or wastewater infrastructure capability issues envisaged.	Noted.	No modification
71_2	Tony Allen, The Chislehurst Society	Do not object to the proposal at Banbury House.	Noted.	No modification
137_1	Andrew Johnson, Bushell Way Residents Association	<p>Need reassurance that the impact of this development on local highway safety has been considered. In particular, the junction of Bushell Way with White Horse Hill is perceived by local residents as dangerous. The additional traffic caused by a further 25 dwellings (and by the proposed school at the end of Bushell Way) would considerably increase the movements from Bushell Way out onto White Horse Hill where, despite traffic calming measures, traffic often appears unexpectedly from behind parked cars.</p> <p>A care home was demolished to allow Stead Close and the adjoining properties on Bushell Way to be built – this site could be used to reprovide this type of much needed housing.</p> <p>At 25 dwellings, the density would be unacceptably high compared with adjoining sites in the Bushell Way neighbourhood.</p>	<p>The Council will consider the potential impact of any development on road safety in line with Draft Policy 32 on Road Safety. The supporting text of this Policy states that where a proposal is situated in a location with an existing road safety problem, the applicant would be expected to fund any necessary mitigation to resolve the difficulty as far as possible.</p> <p>The proposed school development will also be taken into account.</p> <p>The site policy potentially allows for any type of residential development, subject to other policies in the plan. There is currently no specific plan for a particular tenure or type.</p> <p>Any development will be required to demonstrate appropriate density in line with the London Plan density matrix whilst respecting local character</p>	No modification
170_1	Catherine Lambert	<p>The draft plan does not highlight the space allocation for cars along with the proposal for the development of 'units' or specify what these 'units' will be.</p> <p>Houses located directly opposite the planned site already have an issue with the number of vehicles parked on the street as well as the adjoining White Horse Hill, which is becoming extremely dangerous when entering and exiting Bushell Way. It is difficult to see oncoming traffic from both directions on White Horse Hill when exiting Bushell Way due to the volume of cars parked close to the exit.</p>	<p>The policy for this site does not specify detail about aspects of the residential units because there are potentially a range of development types which may come forward.</p> <p>The Council will consider the potential impact of any development on road safety in line with Draft Policy 32 on Road Safety. The supporting text of this Policy states that where a proposal is situated in a location with an existing road safety problem, the applicant would be expected to fund any necessary mitigation to resolve the difficulty as far as possible.</p>	No modification
172_1	Mr Trevor Palmer	Properties directly bordering this site could be affected by a number of issues and residents	The Draft Policy for the site, which will guide an application for planning permission, states that	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>would like to be involved in the development & consultation of this issue and those relating to boundary security, mass of building, location relative to privacy and sunlight and general parking provisions.</p> <p>This development also needs to be considered in conjunction with the proposed primary school in Bushell Way in terms of increased traffic/parking.</p>	<p>proposals will be expected to respect the amenity of adjoining residential properties. Adjoining owners are notified of planning applications when they are lodged and any interested party can make representations through that process.</p> <p>The Council will consider the potential impact of any development on road safety in line with Draft Policy 32 on Road Safety. The supporting text of this Policy states that where a proposal is situated in a location with an existing road safety problem, the applicant would be expected to fund any necessary mitigation to resolve the difficulty as far as possible. The proposed school development will also be taken into account.</p>	
175_1	Mr. Brown	<p>A low car use residential placement for elderly people, such as a care home, is suggested. This would complement an already existing sheltered accommodation for elderly people in the area. This in turn will also reduce the amount of parking space within the area, which is currently a problem.</p>	<p>The policy potentially allows for any type of residential development, subject to other policies in the plan. There is currently no specific plan for a particular tenure or type.</p>	No modification