

Bromley Proposed Submission Draft Local Plan consultation 2016

Summary of Responses June 2017

Part 2 - contents

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Chapter 2 - Living in Bromley. Section 2.1 - Housing (continued from PDF 1)

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 2 – Affordable Housing				
10_1	Mr Bert Baxter	Bromley's annual target of 641 new homes is under half of what is needed in affordable housing alone. The plan is therefore unsound as it does not seek to meet resident needs.	See responses on housing need in relation to Draft Policy 1 Housing Supply.	No modification.
23_1	Patrick Bloom	The policy is unclear. Whilst it is accepted that some form of development is required, it should be managed in a way that does not put undue pressure on infrastructure, as there are already existing problems with water pressure, sewage, transport, parking, schools etc. There should also be some affordable social housing.	<p>The Draft Local Plan includes Draft Policy 2 Affordable Housing that sets out the Council's requirements for affordable housing within schemes that trigger the threshold including the tenure split (subject to flexibility where necessary).</p> <p>The Draft Local Plan takes into account infrastructure requirements that will result from proposed development allocated / listed within the Plan at Appendix 10.13. Additionally, each proposal is dealt with on its own merits in consultation with relevant key infrastructure bodies.</p>	No modification.
25_3	James Stevens, House Builders Federation	Note paragraph 2.1.28 that refers to the South-East London Sub Regional SHMA 2014. Document not available online December 2016. Difficult therefore for interested parties to comment on assessment of the need for affordable housing in Bromley and appropriateness of policy. References paragraph 159 of the NPPF and Policy 3.3G of the London Plan that refer to need for LPA to have a clear understanding of borough needs. 2014 SHMA is of a questionable date and therefore need may have changed. Evidence of a high need for affordable housing would require Council to consider whether it is necessary to increase housing supply figure to meet the need. If figure of 1400 affordable homes /year is reasonably accurate figure of 641 dpa would represent just	<p>2014 sub-regional SHMA is a relevant evidence base document. The document was not available on the Council's website in December 2016. The document will be placed on the website to rectify this issue.</p> <p>The Draft Local Plan refers to the high level of need for affordable dwellings in paragraph 2.1.28 (2014 SHMA) and this high level of need is still relevant to the borough. In terms of the capacity of the borough to accommodate housing during the Plan period the GLA 2013 SHLAA, in addition to the Council's own call for sites exercise, is relevant. The minimum requirement figure of 641 is the most up-to-date figure for the borough and through the Local Plan process the Council has identified sites in Appendix 10.1 to exceed this</p>	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>45% of total affordable housing need. Figure of 641 is going to contribute very little to addressing affordable needs of borough.</p> <p>35% affordable housing target justified on basis of viability assessment dating back to 2012. More up-to-date study should be commissioned. Shifting policy arena in terms of design and construction standards (including National Housing Standards for example Part M4 (2) and (3).</p> <p>In terms of developer profit the Council has allowed for 20% GDV for market housing which may be too low for many developers who would tend to expect 25% (2012 Study).</p> <p>Questions viability of 60% affordable rent / social rent as 2012 viability assessment seems to rely on affordable rent. Social rent further reduces residual land values and impacts upon Value Levels 1 and 2 (Mottingham, Penge, Crays, Cator and Clock House) – areas where housing delivery is critical (for example Mottingham Renewal Area). If affordable rent values are justifying 35% then this tenure should be reflected in Local Plan.</p>	<p>figure up to 2029/30.</p> <p>See also responses on housing need / DtC (within the sub region) within Draft Policy 1 Housing Supply.</p> <p>The target set out in Draft Policy 2 is supported by the Council's latest evidence base document on affordable housing viability – Draft Affordable Housing Viability Assessment Update (2016). Governments Housing Standards have been factored into the Assessment.</p> <p>20% considered a reasonable level within the latest Assessment.</p> <p>Inclusion of social-rent and affordable rent accords with national and regional definitions of affordable housing that could be delivered in a number of locations within the borough. Viability of particular tenures within schemes will be considered on a case by case basis.</p>	
30_12	Mr Hough, Sigma Planning Services for South East Living Group	Reliance on urban redevelopment will restrict delivery of affordable housing overwhelmingly required (high existing use values, abnormal development costs, demolition, decontamination, construction costs, etc).	Draft Policy 2 within paragraph 2.1.38 allows for circumstances where the viability of a scheme may be affected due to additional costs including abnormal development costs and contamination.	No modification
36_2	Thomas Leigh, Colliers for Aberdeen Asset Management	The Council has set out that it will seek 35% affordable housing as far as is viable. This approach is appropriate given provisions set out in the London Plan, but developers also have opportunities to provide evidence to prove their provision of affordable housing is viable. This is in	See above response in relation to the viability of schemes.	No modification

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		accordance with the NPPF (paragraph 179) which states that careful attention to viability should be taken and that plans must be deliverable.		
40_2	Lucy Bird, St William Homes	<p>Draft Policy 2 proposes a 35% affordable housing provision for all new residential development, whilst noting that proposals below this level (or suitable tenure mix split) will be required to submit evidence within in a financial viability assessment. The NPPF makes clear that plans should be deliverable and take viability into account, particularly paragraph 173 which states that sites identified in the Plan should not be subject to such policy burdens. National policy states that where the cost of land is a major barrier, local authorities should engage with landowners when considering options to secure successful development of sites.</p> <p>Whilst no objections have been raised, the Council should make it clearer that the site specific constraints and associated viability will be taken into account when considering housing offers.</p>	See above response in relation to the viability of schemes.	No modification
61_2	Kieran Wheeler, Savills for Bellway Homes	<p>(Maybrey Works) A numerical target should be included, and the 11 unit threshold application clarified. It should also clarify whether affordable housing is calculated on a unit or habitable room basis.</p> <p>The wording of the policy should clarify that the sought tenure split should be subject to viability and site specific circumstances. Furthermore should consider and encourage a range of affordable housing products.</p> <p>Clarification as to how payments in lieu will be calculated should be provided.</p>	<p>Draft Policy 2 specifies that the policy is based on habitable rooms. Percentage target in accordance with London Plan.</p> <p>Flexibility is incorporated into the Policy to take account of viability and site specific circumstances (paragraph 2.1.38). Intermediate, affordable rent and social rent are included in the definition of affordable housing as set out in paragraph 2.1.34 and the Glossary.</p> <p>Calculation of payment in lieu set out in June 2013 Addendum to the Affordable Housing SPD.</p>	No modification
80_2	Labour Group	Planning approvals over the last two years ignore this requirement and it is not enforced by the Council. Viability statements are insufficiently examined and developers are rarely challenged.	Each case is dealt with on its own merits in line with the flexibility that is factored into the affordable housing policy. The level of need for affordable housing in the borough is high as	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Contrary to statements made in the policy, payments in lieu are the norm, not the exception.	identified within the 2014 sub-regional SHMA and Draft Policy 2 aims to ensure that affordable units are delivered on site within relevant schemes. Where developers specify that affordable housing is not viable the Council undertake independent viability assessments to see if the findings are correct.	
125_2	Greater London Authority	Local Planning Authorities are strongly encouraged to follow the approach set out in the Mayor's Draft Affordable Housing and Viability SPG and introduce a threshold level for viability. The SPG sets a threshold of 35% but this should be met without public subsidy, and additional affordable housing sought using grants. Bromley are encouraged to reflect this approach to help provide consistency.	<p>The policy states that if less than the 35% affordable housing required is proposed by an applicant a Financial Viability Assessment will be required to evidence that the 35% is not financially viable. This is in line with the Mayor's Draft Affordable Housing and Viability SPG.</p> <p>For clarity Suggest minor modification to supporting text after 2.1.30 where reference to the Mayor's Housing SPG is made.</p> <p><u>"Where public subsidy towards affordable housing is used, this should result in an increase in the provision of affordable housing on site reflecting the Mayor's Draft Affordable Housing and Viability SPG."</u></p>	Minor modification to supporting text.
138_2	Andy Black for CALA Homes	<p>The target set out in the Draft Plan is based on out of date evidence. The Local Plan needs to be supported by more up to date viability assessments.</p> <p>The percentage and tenure split requirements will inevitably have a detrimental impact on the viability of a site and this is neither justified nor reflected in the wording of the policy.</p>	<p>The target set out in Draft Policy 2 is supported by the Council's latest evidence base document on affordable housing viability – Draft Affordable Housing Viability Assessment Update (2016).</p> <p>The policy is flexible to ensure each case is dealt with on its own merits, this is reflected in paragraph 2.1.38 of the Draft Local Plan.</p>	No modification.
153_2	Chris Taylor for Orpington Labour Party	More attention should be paid to lack of affordable housing in the borough.	The high level of need for affordable housing in the borough is acknowledged in paragraph 2.1.28 of the Draft Local Plan.	No modification.
157_1	Senaka Weeraman	Queries whether Social Housing will be protected by the policy, and not replaced by housing that is unaffordable.	Affordable housing that is subject to the planning process is secured through a legal agreement that specifies it should remain as affordable housing in perpetuity. Information related to this is included within the Planning Obligations SPD (December	No modification.

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		<p>The term affordable is “disingenuous” as 80% of market rate is not really affordable.</p> <p>Council housing stock is in decline so unsure how new homes are going to be provided for the homeless.</p>	<p>2010).</p> <p>Rents are agreed depending on the location of the site to ensure they are affordable to future tenants. Paragraph 2.1.34 of the Draft Local Plan specifies that affordable rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent where this does not exceed Local Housing Allowance levels unless by exception.</p> <p>The Council's Housing Division work directly with anyone who has declared themselves homeless and are looking for accommodation. It also has a Homelessness Strategy (2012 – 2017). The Draft Local Plan seeks to plan for future housing over a fifteen year period that will include the allocation of affordable housing that could assist the homeless.</p>	
168_5	Dr Elanor Warwick, Clarion Housing Group	<p>The Mayor's income cap for intermediate is a household income of £90,000pa. The Borough's threshold looks low, and if the final levels, must be kept so developers that comply are not penalised.</p> <p>The Borough's definitions of Social Rent, Intermediate Housing, and Affordable Rent should be clarified for certainty.</p>	<p>It is noted that the Mayor's income cap for intermediate is £90,000. Borough levels are set out in paragraph 2.1.35 of the Draft Local Plan but reference should be made to the need to update these regularly.</p> <p>Definitions are set out in paragraph 2.1.34 of the Draft Local Plan and the Glossary.</p>	<p>Minor amendment to supporting text to clarify borough intermediate income levels will be updated on a regular basis after paragraph 2.1.35 as follows:</p> <p><u>“Intermediate housing income thresholds will be updated every three years.”</u></p>

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		The Mayor's setting of a higher strategic target for affordable housing is supported, and a higher threshold of 40% (from 35%) should be considered. Where schemes seek to deliver less, viability tests/review mechanisms should be applied.	The target set out in Draft Policy 2 is supported by the Council's latest evidence base document on affordable housing viability – Draft Affordable Housing Viability Assessment Update (2016). Flexibility is built into the policy to ensure schemes are supported by viability evidence if 35% is not considered deliverable. Where appropriate legal agreements incorporate review mechanisms if 35% has not been achievable at the grant of planning permission.	
178_4	Ms Rose Foley	It is implied that financial contributions from developers are accepted instead of insistence on affordable housing provision. If this remains, it must be explicitly stated that the money will be used on housing projects.	Draft Policy 2 specifies that financial contributions will only be accepted in exceptional circumstances and will be considered on a case by case basis. Where a financial contribution is secured through a scheme the legal agreement sets out how the funds will be spent.	No modification.

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Housing Policies 3 to 10

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 3 – Backland and Garden Land Development				
18_1	Katie Miller, Kent Downs AONB	Does not provide a restriction on residential garden development within the open countryside. Suggests additional criterion in policy wording to reference a proposal that <u>lies within a recognised town or village settlement.</u>	The policy amendment suggestion is overly restrictive, and not in keeping with advice set out in the London Plan. Paragraph 1.2.44 of the GLA's Housing SPG sets out the issues that should be taken into account when considering proposals for development in gardens (in addition to striking an appropriate balance between providing additional homes for Londoners). It is considered the policy as drafted reflects the guidance.	No modification.
53_2	Steve Dennington, London Borough of Croydon	Existing policy is not justified, and should be less restrictive of development of back garden land, whilst ensuring protection from harm of local character in compliance with para 53 in the NPPF (see also draft policy 1 housing supply).	The policy has been drafted in line with the London Plan and paragraph 1.2.44 of the GLA's Housing SPG and is not overly restrictive. See also representation 18_1.	No modification.
59_4	Matthew Frith, London Wildlife Trust	Policy is supported and welcomed.	Support welcomed.	No modification.
71_3	Tony Allen, The Chislehurst Society	Strengthening of policy welcomed.	Support welcomed.	No modification.
114_1	John Escott, Robinson Escott Planning	Policy is negatively worded and should be amended to adopt positive stance to comply with NPPF as follows: New residential development will only be considered acceptable <u>be permitted</u> on backland or garden land if <u>where</u> all of the following criteria are met.	The suggested amendments do not add any value to the policy as drafted. The policy is considered to be positively drafted.	No modification.
Draft Policy 4 – Housing Design				
25_4	James Stevens, House Builders Federation	Part (b) of the policy is unsound because the Council has not adequately justified the need to comply with the nationally described space standards. Part (c) is vague and it is not clear what would constitute that space. More clarity is needed.	The nationally described space standards replace previous space standards used by local authorities and were incorporated into the London Plan through the Minor Alterations in March 2016. Standards 24 & 25 of the GLA's Housing SPG set out the importance of meeting space standards to ensure functional and fit for purpose dwellings over time. Paragraph 2.1.58 plan sets out the justification for part c of Draft Policy 4 and specifies that	No modification.

			<p>“Minimum standards are set out for London but it is important to address the existing character of amenity space within an area and show how new developments can relate to it.” Consequently, it is noted that there are London amenity space standards (and representation 25_4 refers to more clarity being required) but Draft Policy 4 as drafted allows for proposals to be considered in the context of their surroundings.</p>	
36_4	Thomas Leigh, Colliers for Aberdeen Asset Management	<p>We agree that a high quality of design is required for all developments, as it is an integral part of ensuring the delivery of sustainable development, as set out in the NPPF (Chapter 7). We support the proposed policy approach, as this would provide sufficient flexibility for design of development to be guided through individual circumstances, rather than setting strict policy requirements. It is welcomed that the policy avoids unnecessary prescription or detail and instead concentrates on “guiding the overall scale, density, massing, height, landscape, materials and access of new development”, in accordance with Paragraph 59 of the NPPF. In respect of density, we agree that new developments should have regard to the London Plan density matrix, but consider that sufficient scope should be provided to enable density to be assessed on a site-by-site basis, as this will generally be guided by local character and context.</p>	<p>Support for the policy approach is acknowledged and welcomed.</p>	No modification.
43_2	Sarah Williams, Sustain	<p>The policy should include a clause about provision of space for food growing.</p>	<p>Whilst the benefits of community growing spaces are acknowledged, the London-wide SPG titled ‘Sustainable Design and Construction’ (2014), the NPPF, and the London Plan do not require provisions of communal open space suitable for food growing. They only encourage developments to implement these spaces. It would not be appropriate for this policy to implement this provision. It may be more appropriate to mention the need for community growing spaces in the supporting text of Draft Policy 123.</p>	<p>No modification to Draft Policy H4 but a minor modification is proposed to paragraph 7.0.59 (Draft Policy 123 Sustainable Design and Construction).</p>
58_2	Dale Greetham, Sport England	<p>Recommend reference to Active Design Guidance.</p>	<p>Refer to Active Design Guidance in supporting text of Policy 37 General Design of Development.</p>	<p>No modification to Draft Policy 4 but make minor</p>

				modification to supporting text of Draft Policy 37 General Design of Development.
61_3	Kieran Wheeler, Savills for Bellway Homes	(Maybrey Works) Flexibility should be built in to ensure that design proposals are able to respond to their unique settings.	The policy makes reference to the need to respect local character, physical context, and to propose a design that has an understanding of place to be in conformity with London Plan policies 3.5 and 7.4. In addition, clause a states that a design proposal should recognise as well as compliment the qualities of the surrounding areas. Design proposals should be able to respond to their unique settings without the need for additional flexibility.	No modification.
117_1	John Escott, Robinson Escott Planning	Criterion c and supporting text 2.1.58 should be amended to acknowledge that in some circumstances the provision of amenity space is not possible.	All proposals would need to demonstrate how the provision of shared or private amenity space has been incorporated into their design and dealt with on their own merits.	No modification.
125_3	Greater London Authority	Wording on wheelchair units should be amended to make the supporting text (para 2.1.59) clearer as follows: <i>...designed to be wheelchair accessible [M4(3)(2b)] for dwellings where the end user is 'known' affordable provision where the local authority is allocating or nominating the residents...</i>	Agree minor amendment as drafted.	Minor modification
168_6	Dr Elanor Warwick Clarion Housing Group	Support for the policy in general and particularly the wheelchair housing requirement.	Noted.	No modification.
193_2	Katharine Fletcher, Historic England	Clause (f) should be amended to read <i>...whilst respecting local character, including heritage</i> to avoid ambiguity and align the policy with paras 59-61 of the NPPF.	Agree minor amendment as drafted.	Minor modification.
Draft Policy 5 – Parking of Commercial Vehicles				
71_4	Tony Allen, The Chislehurst Society	Understand policy refers to the curtilage of a residential property. Also aware of larger developments, e.g. of apartments, where parking of commercial vehicles is not allowed. Resulted in commercial vehicles being parked on nearby roads, even though there is sufficient space within the development. Requests a policy for larger developments that encourage developers to provide appropriate space for commercial vehicles designed to avoid the problems which draft policy is aiming to avoid.	Draft Policy 5 relates to circumstances where planning permission may be required for the parking of a commercial vehicle. It would not be appropriate to incorporate an element of parking especially for commercial vehicles in proposed larger developments (on the basis that there might be commercial vehicles residing in the future development) In instances where commercial vehicles require space within these developments a planning application may be required and would be considered on its own merits.	No modification.
Draft Policy 6 - Residential Extensions				

118_1	John Escott, Robinson Escott Planning	Clause b should be amended to remove “or maintained” as an extension to a dwelling house will not maintain the space or gap between the buildings.	The wording of clause b allows for some flexibility when considering planning applications for residential extensions. The inclusion of words “or maintained” are important where space or gaps between buildings contribute to the character of the areas. It is considered that there would be instances where an extension is proposed and space / gaps can be incorporated to address established characteristics within an area / road.	No modification.
Draft Policy 8 - Side space				
5_1	Robert Sharpe	It does not help enable improvements in energy and insulation, and has a negative impact on climate change.	The policy aims to ensure that relevant extensions do not result in a terracing effect and also respect the existing character / spatial standards of residential properties in the borough.	No modification.
13_1	Emma Butler	Policy should not prevent rebuilding on the same footprint, for example, where a single-story garage that extends to the boundary edge has to be rebuilt to accommodate a second-storey extension (due to inadequate foundations for example). Should take account of precedent set in the area by other development.	The policy aims to ensure that relevant two storey extensions do not result in a terracing effect and also respect the existing character / spatial standards of residential properties in the borough. Therefore the example cited could not be incorporated into the policy text. Each case is be dealt with on its own merits.	No modification.
Draft Policy 9 - Residential Conversions				
173_2	Ms Pam Notcutt, The Beckenham Society	On-street parking should not be allowed. Further residential conversions should not be allowed if there is not sufficient off-street parking to meet parking standards.	Each case is dealt with on its own merits including the advice of the Council's Highways officers. It would be overly prescriptive to specify no on-street parking should be allowed. The policy as drafted takes into account the impacts of parking on highways conditions.	No modification.
Draft Policy 10 - Conversion of Non-Residential Buildings to Residential				
168_7	Dr Elanor Warwick Clarion Housing Group	The encouragement of homes from redundant or vacant buildings is welcomed, but need to ensure that the good practice standards referred to in the policies do in fact result in suitable homes.	Noted.	No modification.

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Policy 11 – Specialist and older people’s accommodation

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 11 – Specialist and older people’s accommodation				
67_1	Nick Taylor Carter Jonas for Beckenham Trustees (Langley Court, Beckenham).	<p>The broad thrust of this policy is supported</p> <p>However, object to the requirement for specialist accommodation to be “conveniently located for a range of local shops, services and public transport, appropriate to the mobility of the residents”, which they consider unsound.</p>	<p>Support welcomed</p> <p>The nature of specialist accommodation is highly varied in terms of users and their mobility. The supporting text, highlights the varied nature of specialist accommodation for older persons, but could benefit from clarification that specialist housing caters for a range of residents across the age (and therefore mobility) spectrum.</p> <p>(BEFORE 2.1.80)</p> <p><u>2.1.80A</u> <i><u>“The Council wishes to encourage the provision of a high quality living environment for those living in Specialist accommodation, which includes supported housing to meet the different accommodation needs of people with learning disabilities, mental health problems, as well as specialist housing for older people”</u></i></p> <p><i>“2.1.80 Models of accommodation designed for older people continue to evolve. Over the last decade there has been reduced reliance on residential care homes and a shift towards enabling people to retain their independence, remaining living in the community with appropriate support or in Extra Care Housing (ECH) which provides improved opportunities for <u>people who are no longer able to live in their own home, even with support, including older physically frail people, and thereby</u> reducing the demand for residential care. However, there remains a potential growth in demand for both nursing and residential care for “Elderly Mentally Infirm” (EMI) people.”</i></p> <p>The policy as drafted already requires</p>	Minor Modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
		Recommend that the policy be amended to express support for the provision of specialist housing across all tenures and these will be expected to be of the highest design quality, supported by appropriate parking and suitably landscaped amenity space.	“ <i>appropriate parking and suitably landscaped amenity space</i> ”. Proposals will be considered in light of all relevant Local Plan policies, notably draft Policy 37 ‘General Design of Development’ which expects a high standard of design’ and sets criteria to that effect.	
138_3	Andy Black for CALA Homes	<p>Supports inclusion of policy but not restrictions for proximity to services and public transport.</p> <p>The policy places the emphasis on the applicant to justify demand for such housing and it is submitted that the council has done nothing to quantify this demand as evidenced within a number of other assessments for London and the closer sub region. It is suggested that the council should assess the need for care and provision of older peoples housing as part of its obligation under the Care Act and sites which have the potential to supply specialist housing of differing tenures should be specifically identified.</p>	<p>As above.</p> <p>This is a misreading of the policy which does not require the proposals for specialist and older persons accommodation to justify demand for such housing. Rather it protects sites already in such use, requiring applicants to demonstrate that there is no demand, should a proposal come forward for other uses (including general housing) on a site currently providing specialist housing.</p> <p>Para 2.1.81 points to the Draft Local Plan “Older Persons Accommodation” evidence base.</p>	No Modification
157_4	Senaka Weeraman	How will the plan deal with dementia	The Draft Local Plan policy supports the provision of specialist accommodation, and in para 2.1.80 acknowledges the potential growth in demand for both nursing and residential care for “Elderly Mentally Infirm” (EMI) people. Policies 26 ‘Health and Wellbeing’, 33 ‘Access for All’, and 37 ‘General Design of Development’ seek to ensure environments appropriate to people with physical and sensory disabilities.	No Modification

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Section 2.2 - Travellers

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 12 – Travellers Accommodation				
18_2	Katie Miller, Kent Downs AONB	<p>Welcome the criteria based policy for new Traveller Sites to be located outside areas of constraint, complying with 'Green Belt and other open space policies'.</p> <p>To provide appropriate protection of the AONB, in accordance with para 115 of the NPPF Seek specific reference to the AONB policy (Draft policy 76) to be added to criterion a, particularly as the AONB policy is currently found within the Nature Conservation Section, rather than the 'Open Space' Section of the draft Plan.</p>	<p>Support welcomed.</p> <p>Whilst clause a) specifically references "Green Belt and other open space policies" is requires that sites lie "outside any [emphasis added] areas of constraint".</p> <p>Para 2.2.13 describes the breadth of constraints. It does not specifically reference the various types of designation AONB, SSSI, conservation areas etc however it is considered to adequately cover the range of constraints stating "<i>Any proposals for new sites will, having first considered the capacity within allocated Traveller sites, be assessed against the criteria within the policy, regarding open space, the availability of services and facilities, the impact on neighbouring properties and the local environment (including natural, built and historic features) and the health and wellbeing of the travellers</i>".</p>	No modification
23_2	Patrick Bloom	<p>Is supportive of measures taken to help his community.</p> <p>Indicates "no" with regard to whether the Council has met its duty to co-operate</p>	<p>Support welcomed</p> <p>Responses to other questions raised no concerns. There is no elaboration on concerns about duty to co-operate and given the phrasing of the questions ('no' indicating no concerns and no desire to appear at Inquiry) this may have been an error, selecting 'no' to all.</p>	No modification
38_5	Alice Roberts, CPRE London	<p>Questions the need to de-designate traveller sites on the following grounds:</p> <ul style="list-style-type: none"> It removes the possibility of it being returned to open green land in the future. 	<p>The Local Plan Section 2.2 sets out its approach to meeting Traveller Accommodation need.</p> <p>The last paragraph of the policy allows for return to Green Belt uses "<i>Given the allocation of the sites as insets within the Green Belt for Traveller Sites only, only uses appropriate in the Green Belt will be permitted should the site no longer be</i></p>	No modification

		<ul style="list-style-type: none"> The knock on effect to surrounding designated space no longer constituting a clear stretch with designated protection. This may also make it difficult to maintain the new boundaries beyond the life of the current Local Plan. 	<p><i>needed for traveller purposes.”</i></p> <p>The allocations are proposed in accordance with national guidance (Planning Policy for Traveller Sites 2015) which enables “<i>exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site</i>” (para17).</p> <p>The proposed allocations minimise the impact on the Green Belt and provide defensible boundaries to enable effective monitoring and control of the sites.</p>	
53_3	Steve Dennington, London Borough of Croydon	<p>Suggest additional criteria avoiding locations of sites in areas of high social deprivation in order to manage further pressure on existing social and health infrastructure.</p> <p>Such a criteria would be relevant to the location of the five private sites for gypsy and travellers, and the two show people sites, in relation to New Addington (Croydon) which is an area of high social deprivation. (Croydon Local Plan has not allocated a site in New Addington).</p> <p>Concern is also raised with regard to the impact on services of future need</p> <p>Suggest the plan should</p> <ul style="list-style-type: none"> set out objectively assessed need (OAN) for Gypsy and Traveller accommodation and how this is met or justification for not meeting the OAN 	<p>The proposed allocations include existing occupied private sites. Para 2.29 of the Local Plan highlights the ‘Traveller Accommodation Assessment 2016’ which sets out the methodology for site selection to meet current need.</p> <p>The representation acknowledges that the sites of concern to Croydon have been occupied for well over a decade and have a variety of current / expired planning consents. The occupants of these sites will already be using local facilities in the nearby centres of New Addington (Croydon) and Biggin Hill (Bromley) i are already using local services.</p> <p>The policy seeks to address future identified need by first considering the potential within the allocated traveller sites. The likelihood is that the future need will come predominantly from household formation on the private sites private sites.</p> <p>Bromley’s objectively assessed need (OAN) for Gypsy and Traveller accommodation is set out in the ‘Traveller Accommodation Assessment 2016’ . As the draft policy advises the accommodation needs will be monitored and addressed through the proposed allocations, and should it become necessary, new sites assessed on the basis of the criteria within the draft policy.</p>	No modification

		<ul style="list-style-type: none"> Consider the unmet Gypsy and Traveller accommodation need from the London Borough of Croydon; and, <p>Advises that Croydon is unable to accommodate any of Bromley's future need with unmet need for the ten years post 2026 to be met through a criteria based policy.</p>	<p>Bromley is in a position of having to demonstrate 'exceptional circumstances' for the proposed allocations in the Green Belt to meet its own identified need. It is not therefore able to accommodate unmet need Gypsy and Traveller accommodation from the London Borough of Croydon. Bromley does however have a substantial travelling showpersons site from which the travelling showpeople resort to neighbouring Boroughs. Croydon's GTANA 2013 noted 3 Travelling Showpersons families in Croydon at the time of their survey. Whilst no need was identified at that time no account was taken of future need. Through the proposed allocations and Bromley's criteria based policy looking first at potential within allocated sites Bromley makes significant provision for the current and future need for Travelling Showpersons plots in the sub region (including Croydon)</p>	
197_2	Marie Killip, Tandridge District Council	Note proposed allocations of existing sites to meet identified need but clarification sought as to how needs will be delivered on existing sites.	<p>The draft policy indicates need being met from within the allocated sites. Need is evidenced through the waiting list, which fluctuates, yearly. Travellers can apply to join the Council waiting list for a pitch on the Council's public sites and the management of the waiting list involves a criteria based approach to allocation as set out in the Traveller Accommodation Assessment (2016). In addition to natural churn on the sites there is potential for a further 3 pitches (previous lapsed permission) on a Council site.</p> <p>The proposed allocation of existing private sites provides potential for the existing families to address their future need.</p> <p>Should unforeseen need arise (the draft policy indicates that the need will be monitored) which the existing sites cannot accommodate, the criteria set out in the draft policy will be applied to potential new sites.</p>	No modification
157_9	Senaka Weeraman	Queries whether the traveller community will have genuine say in development in St Mary Cray	There has been extensive engagement with affected landowners, including travellers on private sites, through the Local Plan process For the wider population, including travellers on	No modification

			Council pitches and the settled traveller community, the Consultation Statement sets out how the council's approach to engagement.	
187_2	Paul Garratt	Notes the consistency with national policy and is generally supportive of the contribution travellers make to the life of the community. Concerned over rubbish often associated with traveller sites and hopes this can be addressed.	Support welcomed Clarity in respect of defensible boundaries will assist with the effective monitoring and control of the sites.	No modification
Traveller Site 14 - Star Lane				
59_5	Matthew Frith, London Wildlife Trust	Boundary could be better drawn to fit so as not to remove so much grassland. Object to allocation. <i>Consultee references this to Policies Map Set Part 2: Green Belt boundary changes (Site 34 – Page 20).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The land currently in permitted use as a Traveller site with a range of caravans (static and touring). The boundary has been drawn round the area occupied and used by the Travellers on this site and defined in light of para 85 of the NPPF.	No modification
Traveller Site 15 - Old Maidstone Road				
59_6	Matthew Frith, London Wildlife Trust	Site remains largely open so unclear how it no longer meets Green Belt criteria. Objects to allocation. <i>Consultee references this to Policies Map Set Part 2: Green Belt boundary changes (Site 31 – Page 18).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. There is no actual natural grassland on the site enclosed by this boundary and no potential for additional traveller pitch.	No modification
Traveller Site 16 - 148 Croydon Road				
11_1	Elisa Edwards	This site was specifically granted a temporary personal permission for use as a traveller site for a particular traveller family on appeal some years ago to allow this particular family to use this green belt site to live on because of their special circumstances and as soon as they no longer needed it the site should return to woodland/open land. If designated as a formal traveller/gypsy site the green belt label is lost and it sets a very dangerous precedent. It all seems very unfair, particularly for the immediate neighbours.	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation boundary reflects that of a recent permanent personal permission, granted on appeal, for 5 pitches. The personal permission would lapse should the family vacate the site, however, as an allocated site, it would be open to future owners to apply to the Council for planning permission for pitches on the site, in accordance with the draft Policy which requires that new development within allocated traveller sites be sensitively located and landscaped to minimise adverse impacts on the visual amenity.	No modification

			Additionally the policy indicates, should the site no longer be needed for traveller purposes, only uses appropriate in the Green Belt will be permitted.	
Traveller Site 17 - Meadow View, Saltbox Hill				
59_7	Matthew Frith, London Wildlife Trust	Sites remain largely open so unclear how it no longer meets Green Belt criteria. Objects to allocation.	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which benefits from a Certificate of Lawfulness for 3 pitches.	No modification
Traveller Site 18 - Archies Stables, Cudham Lane North				
59_8	Matthew Frith, London Wildlife Trust	Site remain largely open so unclear how it no longer meets Green Belt criteria. Objects to allocation.	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which benefits from permanent permission, granted on appeal, for a single pitch.	No modification
Traveller Site 19 - Rosedale, Land adj. 1 Vinsons Cottage, Hockenden Lane				
59_9	Matthew Frith, London Wildlife Trust	Site remains largely open so unclear how it no longer meets Green Belt criteria. Objects to allocation. <i>Consultee references this to Policies Map Set Part 2: Green Belt boundary changes (Site 32 – Page 19).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which benefits from permanent permission, for a single pitch.	No modification
Traveller Site 20 - Southview, Trunks Alley				
59_10	Matthew Frith, London Wildlife Trust	Site remains largely open so unclear how it no longer meets Green Belt criteria. Objects to allocation. <i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 33 – Page 19).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which benefits from permanent permission, for two pitches.	No modification
Traveller Site 21 - Mead Green, Layhams Road				
59_11	Matthew Frith, London Wildlife Trust	Proposed for use as traveller site but could be made to fit grounds more appropriately and not remove as much open grassland. <i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 55 – Page 37).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. . It incorporates an existing occupied site with expired temporary permission for 2 pitches. The boundary has been defined in light of para 85	No modification

			of the NPPF and in conjunction with the two neighbouring sites to create a unified, defensible boundary to enable effective monitoring and control of the sites.	
Traveller Site 22 - St Joseph's Place, Layhams Road				
59_12	Matthew Frith, London Wildlife Trust	Proposed for use as traveller site but could be made to fit grounds more appropriately and not remove as much open grassland. <i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 56 – Page 37).</i>	As above (Adjacent site)	No modification
Traveller Site 23 - Millie's View, Layhams Road				
59_13	Matthew Frith, London Wildlife Trust	Proposed for use as traveller site but could be made to fit grounds more appropriately and not remove as much open grassland. <i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 57 – Page 37).</i>	As above (Adjacent site)	No modification
Traveller Site 24 - Keston Mobile Park, Layhams Road				
59_14	Matthew Frith, London Wildlife Trust	Some occupied areas not covered. Rethink the boundary. <i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 58 – Page 37).</i>	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. . It incorporates an existing occupied site with expired temporary permission for 4 pitches, but specifically excludes an occasionally occupied area where an application for a transit site was dismissed on appeal.	No modification
Traveller Site 25 - Keston travelling showmen's ground, Layhams Road				
59_15	Matthew Frith, London Wildlife Trust	<i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 59 – Page 37).</i> Some traveller occupied areas not covered (see Traveller site 26 below)	The allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which benefits from permanent permission.	No modification
Traveller Site 26 - Land at junction with Sheepbarn Lane, Layhams Road				
59_16	Matthew Frith, London Wildlife Trust	<i>Consultee references these to Policies Map Set Part 2: Green Belt boundary changes (Site 60 – Page 37).</i> Extension to traveller area not needed. This area provides a buffer to main roads from 'developed' traveller areas especially as other	The limited allocation has been made in line with 'Planning Policy for Traveller Sites' (2015) and the Local Plan sets out its methodology for assessing need and allocating sites in Section 2.2. The allocation reflects the boundary of the site which	No modification

		<p>areas (see Traveller sites 24 and 25 above) are already being occupied by travellers that are to remain as Green Belt.</p> <p>Consultee recommend a boundary rethink on Traveller sites 24 and 25 and retain area Traveller site 26 as Green Belt.</p>	<p>benefits from temporary permission for 2 plots, granted on appeal due to the lack of available plots on site 25 'Keston travelling showmen's ground'</p>	
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Bromley Proposed Submission Draft Local Plan consultation 2016 – Summary of Responses, June 2017

Section 2.3: Renewal Areas

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 2.3 - Renewal Areas				
34_3	Emma Talbot, London Borough of Lewisham	Request to change the wording of paragraph 2.3.35 to ensure language consistent with the Lewisham Core Strategy 2011 :	Agreed – amendment to the wording of para. 2.3.35. <i>'The Lewisham Core Strategy 2011 indicates that identified a number of areas as Local Regeneration Areas. These areas were identified as falling within the top 20% LSOAS nationally and include Downham. Given these areas have the greatest socio-economic needs, the Lewisham Core Strategy states that with their partners Lewisham will seek to strengthen the quality of life and well-being by addressing deprivation and health inequalities, highlighting a number of wards including Downham.'</i>	<u>Minor modification.</u>
168_8	Dr Elanor Warwick, Clarion Housing Group	These policies accord with Clarion's ongoing commitment to high quality renewal programmes for estates (e.g. the regeneration of the Ramsden Estate in Orpington).	Noted.	No modification.
160_2	Chris Burton	Concerned that the plan (para. 2.3.3 and map of deprivation area) indicates that the Ravensbourne, Plaistow and Sundridge renewal area is a vast expanse of deprivation, which is misleading.	Both paragraph 2.3.3 & the map illustrating the 5 renewal areas in 2.3.7 indicate that only the Downham area of the 'Ravensbourne, Plaistow & Sundridge' renewal area is designated as falling within the 20% most deprived LSOAs. The plan is not trying to imply that the entire area of 'Ravensbourne, Plaistow and Sundridge' falls within the 20% most deprived LSOAs. Apostrophes around 'Ravensbourne, Plaistow & Sundridge' in para 2.3.3 provides clarity. Para 2.3.3: "English Indices of deprivation Deprivation" <i>'Ravensbourne, Plaistow & Sundridge'</i>	<u>Minor modification.</u>

116_1	John Escott, Robinson Escott Planning	The map at 2.3.7 needs a key which explains the differences between the red-edged areas and the blue-edged areas. The note at 2.3.7 is unclear and requires better explanation.	It may be more appropriate to use hatching rather than colour for black and white copying. Amend map for Black and White reproduction and re-word para 2.3.7 for clarity: <i>"Note: The hatched area of blue to the east of the Borough, illustrates includes a single geographically large electoral district falling within the 20% most deprived LSOA's. This LSOA electoral district includes a significant area of sparsely populated Green Belt — a 'Place' referred to in the Characterisation Document as "Eastern Green Belt", which has not been included within "The Cray Valley Renewal Area".</i>	<u>Minor modification.</u>
Draft Policy 13 – Renewal Areas				
43_3	Sarah Williams, Sustain	Capital Growth is disappointed that the borough does not recognise the role of planning in delivering the benefits required to address deprivation in the renewal areas, through the provision of community growing spaces alongside other community facilities. This should be amended by inserting a clause into Policy 13 (b): <i>"and requiring the provision of communal amenity open space suitable for food growing;"</i>	Whilst the benefits of community growing spaces are acknowledged, taking account of the documents cited (e.g. the London Plan) it is more appropriate to reference across the borough. A minor modification has therefore instead been proposed to para 7.0.59 the supporting text to draft Policy 123 Sustainable Design and Construction to reference the promotion of space for food growing where appropriate"	No modification to Policy 13 but a minor modification to para 7.0.59
68_1	Nick Taylor, Carter Jonas for the Rookery Estate	The Rookery Estate supports the designation of its landholding forming part of a Renewal Area.	Support welcomed	No modification.
111_1	Francis Bernstein	Broad support for the Proposed Submission Draft Local Plan. Greater recognition is needed for Crystal Palace District Centre (as mentioned in 2.3.10) so wider changes arising from the Renewal Area actions do not have overall adverse harm to the Centre. Raises concerns about the lack of cross border planning over the boroughs that meet at Crystal Palace risking the wellbeing and sustainability of the area and the Crystal Palace District Town Centre. Suggested amendment to 2.3.17 relating to: <ul style="list-style-type: none"> The description of area, referencing the 	Support welcomed. The views expressed in the suggested amendment are noted, however the concerns are appropriately addressed elsewhere, including <ul style="list-style-type: none"> Draft Policy 15 a) highlights the need to contribute to the thriving cultural and leisure economy in Crystal Palace District Centre and supporting text 2.3.17 highlights the Crystal Palace District Centre as an Enterprise Centre, Various clauses of Draft Policy 13 Renewal Areas which expect proposals to maximise opportunities to deliver, amongst other things, high quality environments, whilst supporting the health/wellbeing of the local 	<u>Minor modification.</u>

		<p>difficulty of accessing the district centre, especially for those with reduced mobility, from stations (steep hills) and bus stops (long walk from parade)</p> <ul style="list-style-type: none"> • The combined impact of proposals across 5 boroughs on the Crystal Palace District Centre notably a site nearby in Southwark • High levels of pollution and parking stress <p>Suggested amendment to Draft Policy 15 b): <i>“presented by the enhancement of, and development within, Crystal Palace Park, consistent with its heritage, economic and cultural values and significance, enhancement of Crystal Palace District Centre, and for the benefit of the wider area”.</i></p>	<p>community and making a positive contribution to the vitality of the local centres and clause f) specifically references the need for strategic working with adjacent boroughs</p> <ul style="list-style-type: none"> • Draft Policy 33 ‘Access for All’ • Draft Policy 111 expects proposals in the Crystal Palace SOLDC to enhance & support cultural functions. <p>However, an expanded description, relocated from the beginning of 2.3.19 to a new paragraph before para 2.3.17 would assist with understanding of the Renewal Area and District Centre relationship with adjoining boroughs .</p> <p><u>2.3.16b: “The Crystal Palace, Penge & Anerley Renewal Area extends from the northwest of the Borough, where it adjoins four other boroughs Croydon, Lambeth, Southwark and Lewisham, and meets the Crystal Palace District Centre, downhill to the Penge and Anerley. It includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Betts Park and Maple Road / Franklin Road.”</u></p> <p>And deleting from para 2.3.19 2.3.19: “The Crystal Palace, Penge & Anerley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Betts Park and Maple Road / Franklin Road. The identification of Crystal Palace as a Strategic Outer London Development Centre (SOLDC) with...”</p> <p>The reference in clause b) to “the wider area” is considered sufficient</p> <p>.</p>	
134_5	Chris Francis, West and Partners for Dylon 2 Ltd	Relates to Dylon site - See also DLP Policy 82 LSIS	As para 2.3.6 explains Bromley’s renewal areas are based on the Mayor’s ‘Areas of Regeneration’,	No modification.

		<p>The draft plan fails to identify Lower Sydenham as a renewal area. This is an area, which performs less well against a range of economic, deprivation and housing indicators than LBB averages and as such should be a focus for renewal and improvement. This therefore results in the failure to meet:</p> <ul style="list-style-type: none"> the requirements set out in Policy 2.6, 2.7 & 2.8 of the London Plan, objectively assessed development and infrastructure requirements and is not sound. <p>There is no evidence that LBB has sought to Cooperate with Lewisham to address socio-economic issues associated with this area.</p>	<p>set out in the London Plan (the 20% most deprived LSOAs); these relate to indices of multiple deprivation. Whilst areas within the borough of Bromley may score lower on individual indicators, where the multiple deprivation index is within the 20% most deprived LSOAs, the 'Place' which encompasses one of these areas of regeneration, has been defined as a Renewal Area in the draft Local Plan.</p> <p>The Place within Bromley Borough identified as "Beckenham, Copers Cope & Kangley Bridge", lies adjacent to Lower Sydenham, scores relatively well and doesn't therefore meet the criteria for Renewal Area designation within the Local Plan.</p> <p>Councils have a Duty to Co-operate with neighbouring authorities and regular meetings are undertaken between Bromley and Lewisham. Whilst there may be higher levels of deprivation in Lower Sydenham within Lewisham, this has not resulted in any particular designation relating to regeneration in the Lewisham adopted Core Strategy (2011) or their 2015 Consultation on a Local Plan, other than with reference to Sydenham as a District Hub.</p>	
135_5	Chris Francis, West and Partners for Relta Ltd	As above.	As above.	No modification.
168_9	Dr Elanor Warwick, Clarion Housing Group	Clarion supports the policy and focuses on the breakup of mono-tenure concentrations of housing, to deliver truly mixed tenure schemes, as evidenced by the Ramsden Revival Estate.	Support welcomed.	No modification.
193_3	Katharine Fletcher, Historic England	<p>Seeks to ensure that developments address the heritage assets in the areas positively. Suggests:</p> <ul style="list-style-type: none"> a reference in policy to characterisation of these heritage assets, based on the draft Borough Characterisation study, e.g.: "<i>The Council will seek to maximise opportunities for enhancement and improvement within the Renewal Areas, and will ensure this is based on an understanding of the character and positive assets of the areas. Proposals</i> 	<p>The concern is noted but adequately covered in clause 13a) expecting proposals to maximise opportunities to deliver high quality environments, which complement and enhance existing development and 'assets', including built heritage and other environmental; assets.</p> <p>.</p>	Minor modification.

		<p><i>should provide ...</i></p> <ul style="list-style-type: none"> a change to Para 2.3.12 to explain the action from the proposed addition to policy 13 above, e.g.: “...<i>various Renewal Areas. <u>The Council will ensure that characterisation of the townscape and heritage of the Renewal Areas is carried out through further work, and that this is made publically available</u></i>”. 	Supporting para 2.3.12 already references the development of guidance. An amendment to this paragraph could usefully highlight heritage assets: 2.3.12: “ <i>The various Renewal Areas have a range of assets, physical (including heritage) social and economic, ...</i> ”	
Draft Policy 14 - Development Affecting Renewal Areas				
168_10	Dr Elanor Warwick, Clarion Housing Group	Clarion is supporting renewal areas by providing residents with skills, training and opportunities to improve their economic situation through the Ready2Work programme.	Noted and support welcomed.	No modification.
193_4	Katharine Fletcher, Historic England	Addition to policy to ensure characterisation assessments are produced: “... <i>will prepare townscape and heritage characterisation assessments and, where appropriate, prepare Development Briefs or other guidance.</i> ”	Townscape and heritage characterisation assessments fall within the category of “other guidance” which the policy already indicates will be prepared where appropriate.	No modification.
94_2	Clare Loops, London Borough of Bexley	<p>Bexley supports the approach to the Renewal Areas.</p> <p>With regards to Draft Policies 14 & 17, the Council would welcome the opportunity to comment on the preparation of any Development Briefs affecting the Cray Valley Renewal Area.</p>	Noted and support welcomed.	No modification.
Draft Policy 15 – Crystal Palace, Penge and Anerley Renewal Area				
119_2	Ken Lewington, The Crystal Palace Foundation	<p>The opening line of paragraph 2.3.18 should be changed to “<i>Crystal Palace Park is a Grade II* listed park designated as Metropolitan Open Land which was once home to Sir Joseph Paxton’s Crystal Palace, the structure which originally which, in its original form, housed the Great Exhibition of 1851 on Hyde Park</i>”.</p> <p>Also, the Crystal Palace Foundation is opposed to the proposed development that forms part of the approved Masterplan, mentioned in 2.3.18.</p>	<p>This is a reasonable change and will be implemented - add amendment to para. 2.3.18.</p> <p>Noted.</p>	<u>Minor modification.</u>
190_2	Dr Ellinor Michel	The Grade 1 Heritage Asset of the Crystal Palace Dinosaurs is seen as 'vulnerable & declining' and at risk by Historic England. There has been significant continued deterioration to the site since an official English Heritage/Historic England visit	Draft Policy 15 seeks to maximise opportunities to enhance Crystal Palace Park consistent with its heritage value & significance. This will ensure that assets of cultural importance within the park, such as the dinosaurs, will benefit from proposals	No modification.

		in 2014. While there has been recent conservation work, it has not solved structural issues, and it has not yet been possible to fund work on all of the at-risk sculptures.	and be protected from any potential negative effects.	
193_5	Katharine Fletcher, Historic England	Due to the sensitivity of Crystal Palace, and the conservation areas within this Renewal Area, it is recommended that the wording within Policy 15 is amended to: <i>“Proposals within the Crystal Palace, Penge and Anerley Renewal Area will be expected to maximise create opportunities to.”</i> Following part c, a further recommendation is the addition of: <i>“All proposals must respect the character of the areas and ensure a positive relationship with natural and historic assets”</i> .	The word maximise is considered more appropriate since this may involve creating new opportunities or enhancing existing opportunities. Policy 15 b) ensures that development is consistent with the heritage of Crystal Palace is stated.	No modification.
53_4	Steve Dennington, London Borough of Croydon	Croydon Council welcome the requirement of this policy for proposals to contribute to the cultural & leisure economy which has evolved in Crystal Palace District Centre. However, the Council question the effectiveness of the policy by the use of the words “ <i>expected to maximise opportunities</i> ” (Policy 15), therefore the policy could benefit from clearly stating how development could maximise opportunities to contribute to the economy of Crystal Palace District Centre; and remove the words “ <i>expected to</i> ” from the policy wording so that the policy is more positive.	The purpose of the policy is to ensure opportunities are maximised in the stated clauses (a, b & c), therefore the phrase ‘ <i>expected to</i> ’ is appropriate. Additionally, the suggestion to clearly state how development could maximise opportunities to contribute to the economy of Crystal Palace District Centre isn’t necessary as this is implied throughout the supporting text. The specifics on how the economy could benefit are not suitable for the main policy and belong in the supporting text.	No modification.
Draft Policy 16 – Bromley Common Renewal Area				
68_2	Nick Taylor, Carter Jonas for the Rookery Estate	The policy is supported. The boundary of the Renewal Areas passes broadly through the middle of our client’s landholding, and this would appear to be illogical. Our client suggests that a more logical and sensible boundary would be to extend the boundary of the Renewal Area to include all of the land up to Hayes Lane/B265 to allow a comprehensive approach to be taken to achieving the strategic objectives.	Support is welcomed Whilst the boundaries of the ‘Places’ within Bromley, including those defined as Renewal Areas, are generally based on electoral districts - Lower Super Output Areas (LSOA’s) the boundaries are not intended to be read as hard boundaries for the interpretation of policy. Draft Policy 16 indicates that nature of opportunities for proposals within the Bromley Common Renewal Area, however, the Local Plan does not adopt a simple in or out approach to Renewal Areas, rather, under draft Policy 14 “Development Affecting Renewal Areas” it requires that	No modification.

		As part of the Renewal Area and achievement of wider strategic objectives, Policy 16 should be revised to refer to “ <i>appropriate green infrastructure and housing development</i> ”.	proposals “in or close to Renewal Areas demonstrate their contribution to economic, social and environmental improvements”.	
Draft Policy 17 – Cray Valley renewal area				
51_1	Charles Murithi, Environment Agency	<p>Suggested addition to part b: “<i>to protect and enhance the green wildlife corridor along the River Cray, integrating with the public realm, along highways and open spaces and through commercial and industrial areas by creative design, including restoration of the river and providing improved ecological habitats to buffer the watercourse.</i>”</p> <p>The addition of river restoration and buffering is because much of the development abuts parts of the River Cray, which has historically been significantly degraded by poor quality urban design, and restoration is desirable and required to meet its ecological potential.</p>	<p>Clause b) sufficiently highlights the expectation to maximise opportunities to enhance the green wildlife corridor. However an additional paragraph of supporting text is considered to appropriate to support clause b)</p> <p>New Para 2.3.26 b <i>The River Cray runs through open spaces, including recreation grounds, SSSI and SINC designations, as well as residential, commercial and industrial areas and two conservation areas. Development may present opportunities for the restoration of the river and providing improved ecological habitats to buffer the watercourse.</i>”</p>	<u>Minor modification.</u>
57_1	Ben Read, Rapleys for Associated British Foods	<p>Consider Draft Policy 13 generally sound and Policy 14 sound as long as the policy adopts a flexible approach to economic development that acknowledges that different developments will meet the different objectives to varying degrees.</p> <p>Supports Draft Policy 17; however additional commentary is required to clarify that proposals for new town centre uses in Orpington will be considered in conjunction with relevant retail impact and sequential test considerations.</p>	<p>Support for policies 13 and 14 welcomed.</p> <p>Applications will be expected to seek to maximise the opportunities their proposals present to contribute economic, social and environmental benefits. Such opportunities will be dependent upon the nature and scale of any proposal.</p> <p>Support welcomed.</p> <p>Supporting text 2.3.29 references draft policies 91 and 92 which address the requirements for proposals in town centres. This cross reference could be usefully expanded for clarity / ease of reference.</p>	<u>Minor modification.</u>

			<p><i>“...These developments are reinforcing Orpington’s importance in respect of cultural, social and recreational facilities and its role as a Major Town Centre which is recognised, and reinforced and controlled through in Policies 91 ‘Proposals for Main Town Centre Uses’ and 92 ‘Metropolitan and Major Town Centres’”.</i></p>	
122_14	Sean McGrath, Indigo Planning on behalf of Land Improvements Holdings (LIH)	<p>The Draft Local Plan is not sound because the identified Renewal Area of the Cray Valley requires more detail to identify where the Renewal Area begins and to determine how development can meet the regeneration needs of the area.</p> <p>Furthermore, the Plan does not justify the exclusion of all Green Belt land from the renewal area designation, particularly the land surrounded by urban form. There is clear evidence to justify the release of the Green Belt land in order to meet LBB housing requirements.</p> <p>The St Mary Cray East site should be included in the Renewal Area as it has potential to deliver benefits to meet policy aspirations, such as meeting housing requirements. It serves a limited function as green belt and would support the continued growth of the surrounding Cray Valley area.</p>	<p>Whilst the boundaries of the ‘Places’ within Bromley, including those defined as Renewal Areas, are generally based on electoral districts - Lower Super Output Areas (LSOAs) the boundaries are not intended to be read as hard boundaries for the interpretation of policy. Draft Policy 17 indicates the nature of opportunities for proposals within the Cray Valley Renewal Area, however, the Local Plan does not adopt a simple in or out approach to Renewal Areas, rather, under draft Policy 14 “Development Affecting Renewal Areas” it requires that proposals “in or close to Renewal Areas demonstrate their contribution to economic, social and environmental improvements”.</p> <p>The note to the Renewal Areas map (para 2.3.7) explains that the land to the east of the Borough, includes a single large electoral district falling within the 20% most deprived LSOA’s which includes a significant area of sparsely populated Green Belt. The difference in character across the single LSOA is such that it straddles two of the Boroughs ‘Places’. Renewal Area designations do not take precedence over the Green Belt policy set out in the NPPF. It is assumed that the area referred to in the representation as “St Mary Cray East” is comparable to the ‘Place’ referred to in the Local Plan 2011 consultation as “Eastern Green Belt’ The NPPF limitations on Green Belt development are such that has not been defined as a Renewal Area despite the apparent deprivation across the LSOA.</p> <p>Policy 13 places expectations on developments</p>	No modification.

		<p>Policy 13 should be re-worded to confirm that development which delivers the renewal aspirations of the Mayor & the Policy will be supported by LBB.</p> <p>LBB should undertake more work to establish what the specific sources of deprivation in the area are, to guide development and help facilitate social improvements across the Renewal Area.</p>	<p>within Renewal Areas. Proposals will be considered in light of the NPPF and the Development Plan as a whole (which includes the London Plan). The last clause indicates that weight will be attached to proposals which deliver improvements to address the particular issues relating to the Mayor's "Areas for Regeneration".</p> <p>The Indices of Deprivation are provided and updated by the Department of Communities and Local Government comprising 7 domains as outlined in para 2.3.1. Draft Policy 14 'Development Affecting Renewal Areas' indicates that the Council will, where appropriate, prepare Development Briefs or other guidance".</p>	
Draft Policy 18 - Mottingham Renewal Area				
168_11	Dr Elanor Warwick, Clarion Housing Group	Clarion supports the emphasis on the need for co-operation & cross borough working in specific Bromley 'Places' to ensure that the positive impact from regeneration extends beyond immediate neighbourhoods.	Support welcomed.	No modification.
Draft Policy 19 – Ravensbourne, Plaistow and Sundridge Renewal Areas				
160_2	Chris Burton	Concerned that the plan (para. 2.3.3 and map of deprivation area) indicates that the Ravensbourne, Plaistow and Sundridge renewal area is a vast expanse of deprivation, which is misleading.	<p>The Renewal Area designation does not indicate that the entire area of 'Ravensbourne, Plaistow and Sundridge' falls within the 20% most deprived LSOAs. Paragraph 2.3.3 & the map illustrating the 5 renewal areas in 2.3.7 indicate the limited area of Downham, within the wider 'Ravensbourne, Plaistow & Sundridge' renewal area falls within the 20% most deprived LSOAs.</p> <p>Apostrophes around 'Ravensbourne, Plaistow & Sundridge' in para 2.3.3 would provide clarity.</p>	<u>Minor modification.</u>

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

Chapter 3 - Supporting Communities

Sections 3.1 – Social Infrastructure, and 3.2 – Health and Wellbeing

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 20 – Community Facilities				
48_7	Samantha Powell, Education Funding Agency	<p>Supports policy and notes acknowledgement of the NPPF requirement to work with school promoters.</p> <p>Request to add the EFA to the list of relevant organisations in line with the duty to cooperate.</p>	<p>Support welcomed.</p> <p>The EFA is already on the Local Plan consultation database.</p>	No modification.
49_1	Mr Ross Anthony, The Theatres Trust	<p>The Theatres Trust welcomes the inclusion of this policy which will support and safeguard cultural facilities, as required by para 70 and 156 of the NPPF.</p> <p>Recommended that the plan either refer to 'community facilities' or 'social infrastructure' for consistency, rather than both.</p> <p>For clarity, the accompanying text and the glossary should contain an explanation for the term 'community facilities' – "<u>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community</u>".</p> <p>The wording of the policy is slightly awkward, and it should be replaced with more streamlined wording for the second and third dot points, such as: "<u>The loss or change of use of existing cultural and community facilities will be resisted unless:</u> <ul style="list-style-type: none"> • <u>replacement facilities are provided on site or within the vicinity which are accessible and meet the need of the local population, or the necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or</u> • <u>it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.</u>" </p>	<p>Support welcomed.</p> <p>The NPPF Para 70 refers to 'community facilities' whilst the London Plan 2016 refers to 'social infrastructure'. It is therefore appropriate to reference both terms, which can generally be used interchangeably in relation to physical development - 'Hard' social infrastructure.</p> <p>The wording as currently drafted is considered acceptable.</p>	No modification.

		<p>We recommend the following additional wording to the policy to encourage culture, reuse of buildings and town centre regeneration: <u>“The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations.”</u></p> <p>It would be beneficial to produce an up to date planning guidance document to advise how council will assess marketing and viability for change of use applications, as noted in the final dot point of the policy.</p>	<p>Draft Policy 21 ‘Opportunities for Community Facilities’ The suggested revision is inappropriate as it would change the meaning/purpose of the specific section of the policy.</p> <p>The marketing requirements are set out in the supporting text (para 3.1.8 of the draft local plan).</p>	
58_3	Dale Greetham, Sport England	<p>Sport England welcomes the inclusion of this section, but it should specifically reference indoor and outdoor sports facilities, and therefore should be revised to reflect Sport England’s Land Use Planning Policy Statement ‘Planning for Sport Aims and Objectives’, which is in line with the NPPF.</p> <p>Furthermore, this section and policies should be in line with Paragraph 74 of the NPPF and Sport England’s Playing Fields Policy.</p>	<p>Sport England’s Land Use Planning Policy Statement ‘Planning for Sport Aims and Objectives’ and the three objectives are highlighted in para 3.1.20 (supporting text to Draft Policy 21 ‘Opportunities for Community Facilities’).</p> <p>Paragraph 74 of the NPPF and Sport England’s policy relate to the loss of playing fields and are more appropriately highlighted in the supporting text to draft Policy 58 ‘Outdoor Sport, Recreation and Play’ (paras 5.2.36 – 5.2.37).</p>	No modification.
121_1	Matthew Blythin, DHA Planning for Cray Wanderers Football Club	<p>Policy is welcomed/supported and recognised to be broadly compliant with national policy and principles of sustainable development.</p> <p>The wording of Draft Policy 20 could be tweaked to confirm the Council’s intention to work constructively with local organisations to deliver facility enhancements and community access where possible, to make the policy more deliverable and effective.</p>	<p>Support welcomed.</p> <p>This revision is not necessary as the Council’s intention ‘to work with local organisations to deliver facility enhancements and community access’ is mentioned throughout the policy and supporting text, such as in para. 3.1.7, where it states that <i>“the Council will work with agencies and providers to ensure a wide range of accessible community, recreational and leisure facilities...”</i></p>	No modification.
151_4	Ann Garrett for Bromley Friends of the Earth	<p>The Local Plan is unsound in that it would have a severely adverse effect on the environment, by putting pressure on community facilities (reference to Bromley Town Centre).</p>	<p>The Local Plan thoroughly addresses through policies in Sections 5 & 7 (Valued Environments & Environmental Challenges) the impact of development on community facilities and the environment. Additionally draft Policy 22 ‘Social Infrastructure in New Developments’ advise that new developments will be expected to provide social infrastructure appropriate to the nature and</p>	No modification.

			scale of the proposal, and Draft Policy 125 'Delivery and implementation of the Local Plan' requires development to provide for the infrastructure, facilities, amenities and other planning benefits necessary to support and serve it. Para 8.0.7 clarifies that this encompasses physical, social and green infrastructure.	
152_2	John Street for Bromley Green Party	As above.	As above.	No modification.
157_6	Senaka Weeraman	<p>A statement claiming no net loss of libraries does not guarantee that libraries, like in Penge & Anerley, will be kept.</p> <p>The Local Plan does not adequately encourage growth in the tech & arts sectors, for example by providing more studio space.</p> <p>The Local Plan does not adequately address the capacity of food banks, such as Holy Trinity Church Beckenham, which has over 100 people using its services. Therefore, there is a lack of clarity in how the Council will deal with the rising costs of living for vulnerable people.</p>	<p>Draft Policy 20 resists the loss of community facilities unless alternative enhanced provision is made in an equally accessible location for the community it serves.</p> <p>Supporting text paras 3.1.4 and 3.1.5 make clear that community facilities, protected by draft Policy 20 and promoted by draft Policy 21, 'Opportunities for Community Facilities', draft Policy 22 'Social Infrastructure in New Developments', and Draft Policy 125 'Delivery and implementation of the Local Plan'.</p> <p>Matters beyond the scope of the Local Plan</p>	No modification.
165_2	Steve Barnes, Downe Residents Association	<p>The Local Plan is unsound due to a failure to mention Superfast Broadband, which is essential for all residents & businesses. Nearly every other Local Authority in the UK has a plan, and actively works with telecommunications providers to provide this infrastructure, so Bromley's Local Plan is deficient and therefore completely unsound and fails the Duty to co-operate test.</p> <p>Bromley Council has stated ambitions to move towards paperless, on-line access for all residents, therefore must ensure all residents can take advantage of its services.</p> <p>The plan should include such things as: Not Spots, Speeds and coverage, Suppliers and plans for the future, Alignment with Government strategies and policies & Special communities (e.g. telemetry for health, disabled, etc.).</p>	<p>The need for superfast broadband is important and is mentioned in other sections of the plan, such as para. 1.3.9: "<i>support the digital economy and the infrastructure required for it and modern business, such as high speed fibre connections.</i>"</p> <p>The detailed plans for improved broadband are addressed more thoroughly in the upcoming IDP update.</p> <p>Whilst the intention with regard to the Local Plan consultation was to encourage online access where possible the consultation also facilitated more traditional forms of contact. With regard to other services the Council ensures that it meets its responsibilities in respect of contact with residents.</p> <p>These are detailed aspects of broadband, which are touched upon in the upcoming IDP update.</p>	No modification.

174_1	Robert Gordon, Bromley CAMRA	<p>Concerned about the wording of the final paragraph which appears to relate to listed Assets of Community Value (ACVs). The principle of protecting valued community assets should apply to all community facilities, not just those listed as ACVs. Bromley CAMRA believes all public houses have community value although not all would be listed as ACVs. The requirements for eligibility to nominate an ACV are specific and somewhat onerous, (bureaucratic and time-consuming) thereby discouraging nominations. Additionally,</p> <ul style="list-style-type: none"> the Council can turn down nominations without giving substantive reasons for so doing and , unlike for the property owner, the nominating body has no right to appeal against a listing decision. Listings expire after five years. <p>It cannot therefore be concluded that pubs not listed as ACVs do not have sufficient community value or support to warrant protection as valued community assets. The policy and supporting text does not make this sufficiently clear.</p>	<p>The Local Plan acknowledges that ACVs are not the only evidence of value to the community.</p> <p>The language in the final paragraph specifically avoids constraining reference to listed Assets of Community Value (ACVs). Rather, following a discussion with the GLA the Local Plan supporting para 3.1.12 advises that listing as an ACV or the application for listing is “not an exclusive approach” to evidence that an asset is locally valued. This is clarified by the reference in London Plan para 4.48A which refers to evidence of, community asset value, indicating in the related footnote [152] “including an asset listed as an Asset ... or where an application has been made”</p> <p>Additionally Draft Policy 23 resists the loss of Public Houses other than <i>where there is an alternative pub within a 500 metre walking distance, and it can be demonstrated that the business is no longer financially viable</i>. This policy relates to all public houses regardless of ACV status / application.</p>	No modification.
181_2	Mr Peter Martin, Bromley Civic Society	<p>Cinemas, theatres and live music venues are essential for retaining the cultural vitality of town centres throughout the Borough. It is suggested therefore that the soundness of Draft Policy 20 would be much improved by the insertion of new wording as follows, to bring Draft Policy 20 into line with the London Plan (para 4.6) and to ensure it is consistent with the NPPF (para 70): “...to ensure the provision, enhancement and retention of a wide range of appropriate social infrastructure, including facilities for health and education; recreation, sports and play facilities, places of worship, <u>cinemas, theatres</u>, and venues for <u>live music and other cultural and social activities</u>,...”</p>	<p>The suggested addition is not required as the phrasing used in the policy, e.g. “venues for cultural and social activities”, is used to encompass all forms of culture, including cinemas, theatres and live music. Furthermore, cinemas, performing arts venues and nightclubs are specifically mentioned in the supporting text of the policy (para. 3.1.5).</p>	No modification.
Draft Policy 21 – Opportunities for Community Facilities				
71_5	Tony Allen, The Chislehurst Society	<p>Support the objectives behind the policy, but past experience of obtaining LBB support (e.g. reuse of toilet block in Chislehurst High Street Car Park) does not give confidence that the policy will be effective.</p>	Support welcomed.	No modification.

121_2	Matthew Blythin, DHA Planning for Cray Wanderers Football Club	<p>Policy is welcomed/supported and recognised to be broadly compliant with national policy and principles of sustainable development.</p> <p>The wording of Draft Policy 21 could be tweaked to confirm the Council's intention to work constructively with local organisations to deliver facility enhancements and community access where possible, to make the policy more deliverable and effective.</p>	<p>Support welcomed.</p> <p>This revision is not necessary as the Council's intention 'to work with local organisations to deliver facility enhancements and community access' is mentioned throughout the policy and supporting text, such as in Draft Policy 21, where it states "<i>The Council will support the maximisation of opportunities for the enhancement... of social infrastructure, to address the needs of existing and future residents...</i>"</p>	No modification.
Draft Policy 22 – Social Infrastructure in New Developments				
36_4	Aberdeen Asset Management (Tesco, Homesdale Road)	<p>Support the policy and agree that providing appropriate social infrastructure is integral to ensuring the delivery of sustainable development across the Borough, as set out in the NPPF at paragraph 14.</p> <p>Welcome that the level of social infrastructure to be provided in new developments is proportional to the nature and scale of the proposal, and it is considered that the requirement for new open spaces, community facilities etc. should not impact on the viability of development.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Whilst National Planning Policy Framework is clear that where safeguards are necessary to make a particular development acceptable in planning terms, and these safeguards cannot be secured, planning permission should not be granted for unacceptable development, the Planning Practice Guidance advises of the need to understand the impact of planning obligations on proposals. It advises that where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations. Paragraph: 019 Reference ID: 10-019-20140306 Each application will be considered on its individual merits.</p>	No modification.
57_2	Ben Read, Rapleys for Associated British Foods	Concerned that Draft Policy 22 is ambiguous as to the type of development which will be expected to provide social infrastructure. The policy will not be effective without more specific criteria as to the type of development which will be expected to	As the policy indicates, the nature & scale of any proposal will affect the requirement for social infrastructure. Further advice regarding implementation is set out in Section 8 of the draft Local Plan, specifically draft Policy 125 'Delivery	No modification.

		<p>provide social infrastructure. Providing criteria and/or thresholds will make the policy deliverable as developers will be aware of the requirement for the provision of social infrastructure.</p> <p>This policy is not justified as there is no up-to-date evidence which demonstrates the need for social infrastructure (most recent document is Draft IDP 2012).</p> <p>It is considered that for some sites, the provision of social infrastructure onsite would not be compatible with their industrial use, therefore the policy should specifically exclude certain types of development from the need to provide social infrastructure, particularly, where development meets other objectives in the Plan, such as promoting employment development.</p>	<p>and implementation of the Local Plan' and the supporting text which sets out the role of the Infrastructure Delivery Plan (IDP), planning obligations, as set out in the adopted Planning Obligations SPG (2010) and the Community Infrastructure Levy (CIL).</p> <p>The adopted Planning Obligations SPG (2010) identifies the need for a range of social infrastructure and sets the criteria and thresholds for seeking obligations under the current adopted UDP Policy and the draft Local Plan policies. The updated IDP will accompany the Local Plan,</p> <p>Attention is drawn to the wide range of provision encompassed by social infrastructure, including for example the enhancement of the public realm recreational wildlife space (As mentioned in the policy, the nature & scale of any proposal will impact what social infrastructure is required and proposals will be considered on their individual merits in light of all Local Plan policies. The policy allows for contributions to off-site facilities.</p>	
58_4	Dale Greetham, Sport England	<p>Sport England welcomes the inclusion of this section but it should specifically reference indoor and outdoor sports facilities, so should be revised to reflect Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives', which is in line with the NPPF.</p> <p>Furthermore, this section and policies should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy.</p>	<p>Draft Policy 22 deals with social infrastructure in new developments but does not elaborate on the range of social infrastructure / community facilities which is covered elsewhere Section 3.1 of the draft Local Plan. Paragraphs 3.1.4 and 3.1.5. set out the non-exclusive range of community facilities / social infrastructure. Additionally para 3.1.20 draws attention to the planning objectives contained within Sport England's Land Use Policy Statement ' Planning for Sport, Aims and Objectives'.</p> <p>Draft policy 22 which seeks new social infrastructure provision. Sport England's Playing Fields Policy relates to planning applications for development on playing fields and more appropriately referenced through Draft Policy 58 'Outdoor Sport, Recreation and Play' supporting text where para 5.2.37 draws attention to Sport England's role, the protection of playing fields and para 74 of the NPPF.</p>	No modification.

61_4	Kieran Wheeler, Savills for Bellway Homes	The policy should incorporate greater flexibility to ensure that the deliverability of sites is not compromised by on site requirements or via contributions.	The social infrastructure will be expected to be appropriate to the nature & scale of the proposal; therefore the requirements will be decided on a case-by-case basis and each application determined on its individual merits	No modification.
168_12	Dr Elanor Warwick, Clarion Housing Group	For sizable new developments, using the Affordable Social Housing element to kick-start and establish new communities is a sensible way to bring forward funding and support community cohesion. However, it is essential that reasonable levels of infrastructure are in place before occupation and the phasing of these community assets should be carefully considered as part of the S106 negotiations.	Noted. Draft Policy 125 'Delivery and implementation of the Local Plan' indicates that the Council will work 'with relevant providers to ensure necessary infrastructure is secured and delivered in time to support Bromley's consolidated growth and development and provide facilities for the borough's communities'	No modification.
Draft Policy 23 – Public Houses				
109_1	John Escott, Robinson Escott Planning	The policy should be disjunctive rather than conjunctive. As drafted, even if it can be demonstrated that the pub is no longer financially viable, planning permission would still be refused if there is no alternative pub within 500m. The result of this may well be a vacant building which would serve no useful planning purpose. The supporting text would also need redrafting if the policy is amended.	The policy is drafted as intended. Para 3.1.33 sets out the requirements for demonstrating a financial viability case, including details of measures employed to increase trade and diversify the offer as well as robust marketing for 6 months(see supporting text para 3.1.34) . In circumstances where 6 months marketing has not delivered an alternative pub operator, but there is no pub within 500m (or the offer of a local parade / shopping centre would be affected by its loss) the loss will be resisted, however, this does not affect permitted changes of use under the Use Classes Order.	No modification.
174_2	Robert Gordon, Bromley CAMRA	Bromley CAMRA is concerned that this policy may not be effective in achieving its objective of preventing the loss of public houses. The wording of draft Policy 23 is ambiguous and may therefore not achieve its stated objective. In particular, it may be interpreted as allowing the loss of a viable public house if there is another pub within 500m walking distance. This 500m threshold is arbitrary and unnecessary. It is not justified in the supporting text and, while this distance is mentioned in the Council's Public Houses Evidence Base document (2014), nowhere is it justified as a criterion to assess need.	The policy as drafted resists the loss of the loss of pubs unless both clauses a) and b) are satisfied. In addition to ensuring that viable pubs are no lost (clause b) the policy acknowledges the particular impact of the loss of public houses where there are no alternatives within reasonable walking distance. Clause b resists changes of use (other than through permitted development). The 500m threshold, walking distance attempts to ensure ease of access to a public house. Transport for London (TFL) "Travel in London Report 9" (2016) indicates the mean walk trip length by London residents is around 0.5km. The policy threshold of 500m produces an circle	No modification.

			of approx 1km around each pub. The Mayoral Social Infrastructure SPG (2015) indicates in that the minimum reasonable accessibility standard for a pub in areas with 40 persons per hectare is 1km. Thus the policy resists the loss of a pub which would increase the number of dwellings beyond 1km from a pub.	
		The marketing period of 6 months, set out in para. 3.1.33 of the supporting text, is insufficient to properly test market demand for a public house where the owner is determined to sell for a higher-value alternative use. For this reason, a longer marketing period is necessary and justified for public houses. The 2014 Draft Policies and Designations Consultation Document specified a minimum period of 18 months. This is much more appropriate if the policy is to be effective.	The 6 month marketing period was amended from the 18 months set out in the 2014 consultation document to reflect the period of marketing required by draft Policy 83 "Non-designated Employment Land".	
182_1	David Evans	The Council must be vigilant against pub-operating Companies deliberately making a Pub unviable because it is financially advantageous for them to either sell the freehold or change its use. This situation relates to all retail outlets.	Noted. Para 3.1.33 sets out the demanding requirements for demonstrating non viability with validation undertaken at the applicants cost.	No modification.
Draft Policy 24 - Allotments and Leisure Gardens				
43_4	Sarah Williams, Sustain	Capital Growth (part of Sustain) object to this policy because it does not implement the London Plan Policy 7.22 as referenced in the supporting text to Policy 24 at para 3.1.38. London Plan Policy 7.22, Land for Food, encourages local authorities to protect existing allotments. They should also identify other potential spaces that could be used for commercial food production and community food-growing, including for allotments and orchards. Innovative approaches to the provision of spaces may need to be followed, particularly in inner and central London; these could include the use of green roofs. Insert new clause in Policy 24: <i>"The provision of local food growing initiatives within residential developments will be supported."</i>	The draft Policy reflects the London Plan Policy safeguarding existing land used for allotments, exploring opportunities for new allotments. With regard to food growing initiatives within residential developments, it is proposed that this be addressed through a minor modification to the supporting text to Policy 123 'Sustainable Design and Construction' The final bullet point at 7.0.59 to include provision for food growing <i>"Promote and protect biodiversity and green infrastructure including space for food growing where appropriate"</i> .	No modification. Minor modification to para 7.0.59 - supporting text to Policy 123 'Sustainable Design and Construction'
71_6	Tony Allen, The Chislehurst Society	This draft policy is less protective than current policy – requirement to demonstrate long term	The draft policy is more restrictive than the adopted policy having removed the exception	No modification.

		insufficient demand has been dropped.	related to long term insufficient demand. Development on allotment land is only acceptable where enabled by replacement provision elsewhere and requires the retention of an element of open space for public use within any such development.	
143_7	Bob Neill MP	Concerns over apparent scaling down of protections offered to allotments and leisure gardens by dropping requirement to demonstrate long term insufficient demand.	As above.	No modification.
Draft Policy 26 – Health & Wellbeing				
59_17	Matthew Frith, London Wildlife Trust	<p>Supports policy but recommends addition to Draft Policy 26, a): <i>“ensuring appropriate access to open green space, particularly...”</i></p> <p>In para. 3.2.9, reference could be given to the objectives of the All London Green Grid, which include: “encourage healthy living”.</p>	<p>Support welcomed, however the addition of the word “green” is not appropriate because its use could exclude open spaces that are beneficial for health & wellbeing, whilst not being designated as green space, e.g. rivers and outdoor sport facilities.</p> <p>The All London Green Grid is referenced in The London Plan (part of the Development Plan for Bromley) but not in the draft Local Plan. Para 3.2.9. could usefully be expanded and cross referenced to a new paragraph in the ‘Valued Environments’ chapter.</p> <p><i>“3.2.9 The benefits to health of the multifunctional network of green spaces, and the exercise they facilitate including, in relation to mental health, are well documented (e.g. MIND “Ecotherapy”,). This health value is recognised and protection afforded to open spaces through policies in the Valued Environments chapter. whilst Certain proposals may present health concerns, for example, relating to air or light pollution...”</i></p> <p>“Bromley’s Valued Environments Introduction ...5.0.4 <i>London Plan Policy 2.18 ‘Green Infrastructure: The Multifunctional Network of Green and Open Spaces’ and supplementary planning guidance on the All London Green Grid, recognises green infrastructure as an asset, to be valued for the whole range of social, health, environmental, economic and educational benefits it brings to</i></p>	<p>Minor modification.</p> <p>Also minor modification through the addition of a paragraph to the Valued Environments Chapter</p>

			<u>London.</u>	
121_3	Matthew Blythin, DHA Planning for Cray Wanderers Football Club	Policy is welcomed and supported. Wording could be considered at part b to expand on the consideration of proposals for health and wellbeing; and provide active support for proposals that improve health and wellbeing. This change is necessary to ensure the Plan is consistent with NPPF's core planning principles which include "take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs".	Support welcomed. Addition is not necessary. The introduction to the chapter indicates that the policies therein are intrinsic to supporting this is adequately covered in the main body of the policy as well as draft Policy 20 'Community Facilities' and draft Policy 21 'Opportunities for Community Facilities' clause d) relating specifically to support for the provision and enhancement of as in other parts of policy, and the support afforded through Policy the commitment to supporting proposals that improve health & wellbeing is mentioned, for example, the starting line of Draft Policy 26 states that " <i>the Council will work proactively with health professionals and relevant bodies to improve the physical and mental health of the Borough's residents...</i> "	No modification.
168_16	Dr Elanor Warwick, Clarion Housing Group	Clarion works to ensure a firm foundation for Bromley residents' health & wellbeing.	Noted.	No modification.
183_2	Mr Steve Simms, SSA Planning for Kentucky Fried Chicken Ltd	Section b) of the policy does not provide the "clear indication of how a decision maker should react to a development proposal" required by paragraph 154 of the National Planning Policy Framework. It is concerning that the justification text states that "certain proposals may present health concerns, for example ... the proliferation of hot food takeaways", whereas the evidence base does not seem to demonstrate a link between the concentration of food & drink establishments and adverse health & wellbeing outcomes. The uncertainty and lack of evidence means it is unlikely that the policy will be effective and, indeed, it is unclear how the policy could be monitored for effectiveness.	The objective of this section of the policy is to ensure that a decision maker considers the implications of proposals for health & wellbeing, and can justify their decision. Para 3.2.9 advises that "Where health and wellbeing impacts are apparent they will be considered in light of national guidance and locally recognised health evidence, to assess the health impact on the community." Approaches to address hot food takeaway proliferation, linked to adverse health & wellbeing outcomes, are set out in the "Takeaways Toolkit" (GLA 2012) and the NHS "London Healthy Urban Development Unit" 2013 good practice guide "Using the planning system to control hot food takeaways". As indicated above para 3.2.9 indicates that locally recognised health evidence will guide the decision making in respect of clause b). The impact of planning applications will relate to the nature and location of a proposal. Evidence relating to the impact of fast food outlets on healthy weight in Bromley has been presented to	No modification.

		<p>Furthermore, there is nothing in national policy that supports controls on the concentration of food & drink establishments for the purposes of protecting health & wellbeing.</p>	<p>the Bromley Health and Wellbeing Board.</p> <p>The Governments Planning Practice Guidance (2014) sets out the range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, including how</p> <ul style="list-style-type: none"> • “the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area; • opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices...)” [ID: 53-001-20140306] 	
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Bromley Proposed Submission Draft Local Plan 2016 – Summary of Responses, June 2017

Section 3.3 - Education and Appendix 10.4 Education site allocations

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 3.3 – Education				
157_7	Senaka Weeraman	Concerns over potential redevelopment of Free Schools for housing	Draft Policy 27 safeguards “Education Land” for education purposes for the period of the plan	No modification
Draft Policy 27 – Education				
48_1	Samantha Powell, Education Funding Agency	<p>Supportive of</p> <ul style="list-style-type: none"> the draft education policies and allocations the joint working of the planning and education departments the evidence base (Primary & Secondary School Development Plans and Local Plan Education Background Paper). the principle of allocating education sites to help deliver the identified need, and the alterations to the Green Belt / MOL for education purposes for the life of the plan. <p>Consider that there is no justification for the removal of the “sequentially preferable” Balmoral Avenue site, previously identified (“Draft Allocation, further policies and designations document). A site specific representation (produced by JLL) assesses the proposed allocations and alternative sites and conclude that the lack of an allocation at Balmoral Avenue means that the Local Plan is not justified on the most appropriate strategy when considered against the reasonable alternatives (required by NPPF policy 182) and is therefore unsound in this regard.</p> <p>Also consider the plan is not effective, as they do not consider that the sites identified for educational development will be deliverable over the plan period.</p>	<p>Support welcomed, particularly in respect of the principle of allocating education sites to help deliver the identified need, and the alterations to the Green Belt / MOL for education purposes for the life of the plan.</p> <p>The Balmoral Site has since been granted permission for a secondary school and therefore once the school is operational the site will be defined as Education Land by virtue of Draft Policy 27.</p> <p>The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48). The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control). The allocations are considered to provide realistic opportunities to deliver the education infrastructure over the 15 year period of the Local Plan during which the education legislation and funding will continue to evolve.</p>	No modification
131_1	Gillian Bailey	The need for the level of additional school	The Local Plan sets out its approach to meeting	No modification

		capacity is disputed.	need (paras 3.3.24 – 3.3.48). The need has been assessed and agreed by the Council through its Primary and Secondary School Development Plan 2016.	
Draft Policy 28 – Education Facilities				
39_5	Andrew Dorrian, Transport for London	TfL consider the proposed approach to the selection of school sites appropriate. TfL wish to ensure sustainable transport options are available, together with mitigation on existing modes including buses and requests that a consideration of Healthy Routes to schools is added to the criteria. They also encourage strengthening the statement around accessibility of the site by other means than the car, by introducing a statement about school parking and drop off being restricted.	The endorsement of the approach to site selection is welcomed. The policy states that permissions will be subject to highway safety (c) and the accessibility of the site by means of transport other than the car (d). The sustainable transport options and parking / drop off that TfL highlight can be incorporated into the supporting text para 3.3.16 “... <i>planning conditions or obligations, (e.g. Such mitigation may involve travel plans, and the development of “Healthy Routes”, highways measures, including, restriction of school parking and drop off, staggered school hours and landscaping).</i> ”	Minor modification
48_2	Samantha Powell, Education Funding Agency	Supports the <ul style="list-style-type: none"> weight attached to Free Schools who have operated from a temporary site temporarily for a year the support subject to criteria for permanent changes of use of temporary sites supporting text (para3.3.16) seeking mitigation of impacts rather than refusal 	Support welcomed	No modification
59_18	Matthew Frith, London Wildlife Trust	Object to <ul style="list-style-type: none"> de-designation of site of Green Belt, MOL and UOS for school development. Sites include SINCs, playing fields, allotments and other amenity green space “which have an important role to play as part of London’s multifunctional green infrastructure.” object to the inclusion of protected Urban Open Spaces and SINCs within development sites as this sets a worrying precedent that these become immediately vulnerable to development proposals and thus forever lost. Generic need does not constitute “Very special circumstances” 	UOS is not being de-designated. The re designation of Green Belt and MOL sites to UOS is limited and involves protection under draft Policy 28 which specifically highlights open space and conservation area policies in clause (a) and encourages dual use of facilities, including open space. Policy 55 which requires sensitive design and siting to ensure that the impact on the open nature of the site is limited as far as is possible without compromising the educational requirements. Additionally draft Policy 27 resists non education development The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 –	No modification

			3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites.	
71_7	Tony Allen, The Chislehurst Society	Notes a number of additional sites in Chislehurst confirmed as suitable for education (Edgebury Primary and adjacent land, Bushell Way and Chislehurst school for girls). Comments that the dimensions of school sites are not listed. Pleased Mead Road School is not being proposed for expansion / redesignation from GB.	Comments related to Bushell Way addressed below (Site 36) Allocation dimensions are set out in the evidence base. Support for the deletion of Mead Road proposed allocation noted.	No modification
76_1	Michael Bird and Tracey Cummings	Secondary school place data based on info from early 2015 – not up to date. Existing schools should be expanded first before green space used.	Based on the most recently approved pupil place planning data. Updates anticipated for Examination in Public - birth rates do not suggest any reduction. The Local Plan paras 3.3.27 – 3.3.33 set out the approach to meeting need through expansions to existing schools noting that much of the existing education infrastructure already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control).	No modification
80_3	Labour Group	The Labour Group considers that the accepted pressing need to make allocations for secondary school provision in the draft Local Plan is not reflected in the proposals. Specifically they highlight the exclusion of the Balmoral Avenue site which was previously included in the draft local plan, noting that it is supported by the EFA and has a provider ready and waiting. They note that the Kentwood site has much lower capacity, no provider, and an adult education facility which would have to be reprovided elsewhere. They question whether whether the council would be seen to be meeting its obligations to secure sufficient school places within the area. Figures show insufficient places in secondary schools, but while the para 3.3.42 states that there is pressing need to make allocations for provision [by 2018], this does not seem to be reflected in the proposals e.g. table 10.	The Balmoral Avenue site, whilst not included in the Local Plan proposals, was granted planning permission 25 th Jan 2017. (Education Background Paper to be updated) Concerns regarding the deliverability of the Kentwood site are noted and para 3.3.55 highlights the re-provision requirements in respect of the existing uses, which would also be required by draft Policy 20 Community Facilities. A cross reference would assist readability of the plan. <i>“3.3.54 ...or sites within the locality (see also draft Policy 20 “Community Facilities”).</i> The Local Plan proposes allocations sufficient to meet the identified as set out in the Education Background Paper over the plan period. The recent permission at Balmoral Avenue for the 8FE (Eden Park High School) addresses the short term need.	No modification <u>Minor modification</u> No modification

131_3	Gillian Bailey	The policy accepts as an unarguable truth that the wider use of education sites by the community “is a good thing”. Proposals for dual use should be viewed on a case by case basis noting the impact on residential amenity. The absolute nature of the is not justified and the plan is unsound.	The policy is not absolute, it encourages the dual use of facilities by the wider community which support the draft Local Plan Vision, Health and Wellbeing objectives and draft Policy 26 “Health and Wellbeing”. However, where dual use requires planning permission (eg to remove a condition or provide additional facilities) such proposals will be considered on their individual merits.	No modification
191_1	Sue Ellis, Farnborough Village Society	Residents request the removal of Farnborough Primary School from Table 13.	The table reflects the most recent information from the Primary School Development Plan (2016). Clarification may be helpful in para 3.3.40. “... <i>Details of the individual schools identified in the Primary School Development Plan (2015) and Local Plan proposals are set out in Tables 4 and 5.</i> ” Whilst an application to facilitate increased intake was refused in December 2016 and is currently the subject of an appeal. It would not be appropriate to make the requested modification at the current time.	<u>Minor modification</u> No modification
Draft Policy 29 - Education Site Allocations				
125_4	Greater London Authority	<p>The GLA understand the pressing need for educational space as a particularly high priority, however the borough must have thorough evidence that the proposed releases of Green Belt and MOL are justified.</p> <p>Further evidence is required which explores the scope for more intensive use of existing sites and explores other potential innovative approaches such as opportunities to provide schools as part of mixed use developments before any release of Green Belt or MOL can be considered justified.</p> <p>The allocations within the Policy do not appear to completely match the evidence provided in Tables 4, 5, 9, 10 and 11.</p>	<p>Appreciation of the pressing need is welcomed.</p> <p>The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control). Allocations for mixed use schemes are required to deliver alternative strategic needs of the plan.</p> <p>Tables 4,5,9,10 and 11 indicate sites identified to address current and projected need. Not all require specific allocations / redesignation from Green Belt or MOL since some existing schools</p>	No modification

			<p>identified for expansion</p> <ul style="list-style-type: none"> • have either no open space designation or are currently UOS (in Table 4 and 11) • could accommodate proposals which would be consistent with the exceptions to “inappropriate development” as set out in NPPF para 89 (in Table 9) 	
48_3	Samantha Powell, Education Funding Agency	The EFA supports the principle of allocating education sites to help deliver the identified need, and the alterations to the Green Belt / MOL for education use purposes for the lifetime of the plan. However it considers that there is no justification for the rejection of the Balmoral Avenue site for Eden Park High School and that the plan is unsound in this regard.	<p>Support for the allocation of sites and alterations to the Green Belt / MOL to help deliver identified need are welcomed.</p> <p>Noted. The Eden Park High School (8FE secondary school) application at the Balmoral Avenue site, was granted planning permission 25th Jan 2017.</p>	No modification
48_5	Jeff Field, JLL for Education Funding Agency	Former Co-op Sports Ground, Balmoral Avenue should be allocated for education	As covered in the response above	No modification
188_1	Jemma Perkins	<p>There is a clear and pressing need to create new secondary schools in this part of the borough - especially for a mixed or boys provision.</p> <p>Plan is unsound because the Balmoral Ave site, (previously allocated in the Draft Allocations document Sept 2015), has now been removed from the Local Plan with no consultation, and not based on sound planning arguments. This does not seem to demonstrate soundness at all - it has not been positively prepared to meet objective need, it cannot be shown to be the most appropriate strategy and does not even seem to be consistent with the aims of the education aspects of the meeting the pressing need for secondary school places.</p> <p>Strong concerns the Kentwood site allocation is not "sound" in that</p> <ul style="list-style-type: none"> • it is proposed as a 4FE school, however no secondary schools operate on 4 forms - this is clearly much too small and no chain would be able to open a secondary school of this size; 	<p>Appreciation of the pressing need is welcomed.</p> <p>As covered in the response above</p> <p>Draft Policy 27 sets out the Council's commitment to ensuring the provision of an appropriate range of educational facilities, assessing the need and allocating sites accordingly. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48). The allocations are considered to provide realistic opportunities to deliver the education infrastructure over the 15 year period of the Local Plan .</p> <p>Whilst it is anecdotally understood that currently funding may not be provided for 4 FE secondary schools (as indicated at Kentwood) the education legislation and funding regime are evolving and will continue to change over the Local Plan period. Furthermore, there has been no objection from the EFA or DoE on this point.</p>	No modification

		<ul style="list-style-type: none"> contrary to all the other sites shown in the plan, the Kentwood site is not available and is currently in use as an adult education facility. <p>Promoting this site over the Balmoral Ave site has not been made on any objective basis.</p>	<p>As para 3.3.45 indicates the realisation of secondary education on the site will require the reprovision of the existing uses.</p> <p>The Eden Park High School (8FE secondary school) application at the Balmoral Avenue site, was granted planning permission 25th Jan 2017. .</p>	
143_2	Bob Neill MP	<p>Welcomes the allocations that have been set out in the Plan. In principle, I broadly support any schemes that will support education provision, providing they are shown to be acceptable in planning and highways terms through the usual planning process.</p>	<p>The broad support is welcomed.</p> <p>The last clause of Draft Policy 29 planning applications to provide robust assessments of the impacts of development, including for example highways implications, and provide appropriate mitigation to address adverse impacts”.</p>	No modification
133_1	Philippa Loades	<p>Consider it more appropriate to expand existing school sites rather; it is not an appropriate strategy to seek to build new schools on unsuitable sites and locations for example Eden Park High School in Balmoral Avenue.</p> <p>Concern that it seems unreasonable to have to find more places for Bromley residents whilst having to accommodate students living in Croydon and Lewisham boroughs.</p>	<p>As covered in the response above</p> <p>This is a legal matter. The “Greenwich Judgement” established that local education authorities could not stop children travelling to their schools from outside their boundaries. The subsequent “Rotherham, Court of Appeal Judgement” ruled that the local education authority there had acted unlawfully by automatically allocating school places to children living in a catchment area, because that did not give sufficient choice to parents from outside the area.</p>	No modification
38_6	Alice Roberts, CPRE London	<p>CPRE do not accept that the generalised need for school places, which is managed up and down the country, year after year, constitutes very special circumstances for Green Belt or MOL change.</p> <p>This should only occur through a Green Belt / MOL review and LBB undertook such a review in 2012.</p>	<p>As covered in the response above</p> <p>The specific need in Bromley, the scale of which has developed rapidly over recent years, is evidenced through the Council’s approved Primary and Secondary School Development Plans (2016).</p> <p>The work undertaken by the Council in 2012 was not a full Green Belt / MOL review. The approach adopted by the Council as far as the changes to open space designations are concerned was set out on the first page of the ‘Suggested Changes to GB Boundary’ document (Context of the Review) which was a supplementary document associated</p>	No modification

			with the Draft Policies and Designations Consultation.	
58_5	Dale Greetham, Sport England	Sport England highlight the requirement under the NPPF for site allocation and subsequent development on playing fields to accord with Sport England's playing fields policy and objects to the allocation of the land unless the policies are fulfilled.	Draft Policy 21 of the Proposed Submission Draft Local Plan Opportunities for Community Facilities, is in line with Sports England Planning Policy Statement Planning for Sports Aims and Objectives which are referenced in the supporting text. As a statutory consultee on planning applications affecting playing fields Sports England would be consulted and any proposal would be required to comply with policies in the local plan as a whole and para 74 of the NPPF which is reflected in Local Plan Draft Policy 58 Outdoor Sports Recreation and Play.	No modification
59_19	Matthew Frith, London Wildlife Trust	Objects to de-designation of sites of Green Belt, MOL and UOS for the development and expansion of schools.	The allocations are justified in "Education Background Paper" which includes a rigorous site search and explains the exceptional circumstances notably in relation to need.	No modification
76_2	Michael Bird and Tracey Cummings	Object to allocation of St Hugh's playing field and suggest that Green Belt and MOL sites should be given proper consideration, rather than being discounted at an early stage because of their policy designations.	The Education Background Paper (2016) sets out the education need and methodology for assessing all potential sites resulting in the allocation of the St Hugh's Playing Field site. The methodology initially assessed the potential to expand existing infrastructure and employed a sequential approach to site allocation. The NPPF requires that "exceptional circumstances" be demonstrated to justify the release of Green Belt (and MOL, by virtue of London Plan Policy 7.17). A sequential approach to site selection has therefore been taken.	No modification
164_2	Ross Jones	Objects to allocation of St Hugh's playing field and suggest that Green Belt and MOL sites should be given proper consideration, rather than being discounted at an early stage because of their policy designations. . Considers the allocation is not justified, not deliverable and therefore not effective and not consistent with national policy. Therefore considers retaining this allocation is unsound. Suggest that Green Belt and MOL sites should be given proper consideration, rather than being discounted at an early stage because of their policy designations. Noting in particular that the	As covered in responses above, and additionally, The BET site currently provides "alternative provision" (Bromley Trust Academy), was considered in the Education Background Paper (2016) under Group 3 which assessed existing Green Belt / MOL sites for redesignation to UOS to meet need. Over the life of the plan the site may offer potential for either the expansion of the existing "alternative provision". The allocation does not currently indicate a set FE for secondary provision however, the Local Plan recognises that should the current use vacate the site it would	No modification

		BET Hayes Lane site does not have a specific number of FE assigned to it.	offer potential for other forms of education for which there is need, including secondary provision.	
82_2	Jenny Ding	Objects to allocation of St. Hugh's Playing Field as above	As covered in responses above.	No modification
105_2	Cherry Slater	Objects to allocation of St. Hugh's Playing Field, as above.	As covered in responses above.	No modification
106_2	David Black	Objects to allocation of St Hugh's Playing Field as above	As covered in responses above.	No modification
139_2	Susan Savage	Objects to allocation of St Hugh's Playing Field as above	As covered in responses above.	No modification
154_2	Michele Crisp	Objects to allocation of St Hugh's Playing Field as above	As covered in responses above.	No modification
162_2	Sandeep Kohli	Objects to allocation of St Hugh's Playing Field as above	As covered in responses above.	No modification
127_2	John Tiley	Objects to allocation of St Hugh's Playing Field as above	As covered in responses above.	No modification
5_2	Robert Sharpe	<p>Opposes the building of an academy school on "Foxy's" (Foxes) Fields (Mottingham Sports Ground) and raises particular concerns about its suitability on drainage grounds</p> <p>Promotes the advantages of The Porcupine pub, Mottingham, as an education site.</p>	<p>There is no proposal in the Local Plan for a school on Mottingham Sports Ground.</p> <p>The Porcupine Pub site which fronts a busy roundabout on the B226 has not previously been put forward and is not therefore assessed within the Education Background Paper. However, at 0.25ha the site would not have met the initial size sifting criteria</p>	No modification
Education Site 27 - James Dixon Primary School				
59_20	Matthew Frith, London Wildlife Trust	Does not adhere to policy for MOL redesignation. No demonstration of very special circumstances or alternatives	<p>The NPPF sets out the circumstances for de designating Green Belt, similarly applicable to MOL by virtue of London Plan Policy 7.17</p> <p>The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control).</p>	No modification

		<p>This tract of MOL forms an important ecological asset in this part of London.</p> <p>The site continues to fulfil its purpose as MOL and the removal of MOL designation increases the risk that the planned future development will reduce the amount of open space and people's access to nature.</p>	<p>The site is an existing school and the importance of the site ecologically reflects that use.</p> <p>The allocation has been reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the area of re-designation to UOS. . Any proposal will still be subject to the requirements of the Urban Open Space policy minimising the impact on the open nature of the site. There is no public access to the site.</p>	
38_16	Alice Roberts, CPRE London	The proposal does not adhere to regional policy for Metropolitan Open Land re-designation as it has not demonstrated very special circumstances or provided a full investigation of alternative sites (see general points made under Supporting Communities above) and the site continues to fulfil its purpose as MOL. The removal of MOL designation increases the risk that the planned future development will reduce the amount of open space available to children at these schools.	As covered in response above, and additionally, this primary school has over 2ha of open space, which significantly exceeds that provided in most primary schools and the area guidelines for mainstream schools (Building Bulletin 103 June 2014)	No modification
58_11	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
Education Site 28 – Kentwood Site, High St. Penge				
58_12	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft	No modification

		playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	
Education Site 29 - Langley Park schools				
58_13	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
38_7	Alice Roberts, CPRE London	Has not demonstrated very special circumstances or provided a full investigation of alternative sites for change from MOL.	The NPPF sets out the circumstances for de designating Green Belt, similarly applicable to MOL by virtue of London Plan Policy 7.17. The Langley Park Primary School was granted approval by the Secretary of State for Education to open in 2016 and it is currently operating from a temporary location (The Hawes Down Centre). The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current	No modification

		The removal of the MOL designation and allocation for a new school will have a negative impact on the use of the open space by the schools currently on the site.	<p>and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control).</p> <p>The allocation has been amended and reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the existing schools. Impacts on existing sports provision will be addressed through any planning applications. Sports England will be consulted on any planning applications affecting playing fields and any proposal would be required to address policies in the local plan as a whole including Local Plan Draft</p> <ul style="list-style-type: none"> • Policy 58 Outdoor Sports Recreation and Play (which reflects para 74 of the NPPF) • Policy 55 Urban Open Space limiting as far as possible the impact on the open space. 	
59_21	Matthew Frith, London Wildlife Trust	Proposed changing MOL to UOS. Some areas of school grounds remain as part of MOL while some areas of open character become UOS. Boundary requires closer attention and needs adjustment to better reflect what is actually present.	The allocation re designates the minimum area necessary to effectively facilitate the new primary school on the Langley Park School for Girls land, south of Hawksbrook Lane. The amended allocation (since the Sept 2015 consultation) reduces the area to be re designated. The re designation is proposed to be drawn tightly around the complex of schools, excluding the playing field to the north east but, to provide a logical MOL boundary the boys school playing field, set within the complex of buildings is proposed to be redesignated as Urban Open Space.	No modification
Education Site 31 – Bromley Education Trust (BET), Hayes Lane				
38_8	Alice Roberts, CPRE London	Has not demonstrated very special circumstances or provided a full investigation of alternative sites for change from Green Belt.	The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to	No modification

		<p>The removal of the Green Belt designation and allocation for a new school will have a negative impact on the use of playing fields currently in use by local schools.</p>	<p>existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, including the existing "Alternative Provision" on the site, are academised (outside Local Authority control).</p> <p>The allocation has been amended and reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the Green Belt. Impacts on existing sports provision will be addressed through any planning applications. Sports England will be consulted on any planning applications affecting playing fields and any proposal would be required to address policies in the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play (which reflects para 74 of the NPPF).</p>	
59_22	Matthew Frith, London Wildlife Trust	Area could be made to fit grounds more appropriately and not remove as much open grassland out of Green Belt designation.	<p>As covered in response above.</p> <p>The allocation re designates the minimum area necessary to effectively facilitate a potential secondary school</p>	No modification
58_14	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	<p>Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.</p>	No modification

Education Site 32 - Turpington Lane				
38_11	Alice Roberts, CPRE London	<p>Note the outline planning permission for this site, involved the consolidation of the allotments (protected and enhanced).</p> <p>Strongly objects to the allocation for a new secondary school on the Green Belt allotments which</p> <ul style="list-style-type: none"> • disregards the London Plan which states that ‘Boroughs should protect existing allotments’ (Policy 7.22) • breaking of promises made previously, The council should be seeking to protect and enhance these allotments for their community and environmental benefits • lacks consideration of alternative sites, no site-specific case for ‘very special circumstances’, and <p>We suggest that the land is re-designated as Metropolitan Open Land and kept for allotments as promised.</p>	<p>The historic outline planning permission for residential development on part of the allotment site has lapsed and with it the agreement relating to allotment enhancement.</p> <p>The London Plan Policy 7.22 C advises that Boroughs should protect existing allotments. These statutory allotments have been significantly underused. Previously, in connection with a now lapsed application, the Secretary of State has agreed partial development on this statutory allotment site.</p> <p>The proposed allocation, defined in consultation with the allotment holders association, involves only the southern part of the overall allotment area highlighted in the 2015 consultation. The allocation ensures the retention of existing allotments in use at the north of the wider area with the possible exception of a maximum of 4 plots which may be relocated elsewhere on site as set out in para 3.3.52.</p> <p>The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an individual assessment of all potential sites in order to determine how best to address the Boroughs specific needs. For Green Belt / MOL sites assessments were made in light of relevant sections of the NPPF, notably paras 83 – 85 which sets out the relevant considerations for defining Green Belt boundaries and Chapter 11 “Conserving and enhancing the natural environment”</p> <p>The area allocated is required to meet education needs and would become “Education Land”, which under draft Policy 27 and safeguarded for this purpose for the period of the plan. It will also</p>	No modification

			<p>be re designated as Urban Open Space gaining protection under draft Policy 55.</p> <p>The remaining allotment land will be physically separate from the Green Belt. It is welcomed that the request for MOL re designation infers agreement that the site no longer fulfils Green Belt functions, however the Council consider it is more appropriately re-designated as Local Green Space where, under draft Policy 56, development harming it's "special qualities" will be considered inappropriate and will not be accepted except in very special circumstances. An approach which is consistent with policy for Green Belts as required by para 78 of the NPPF.</p>	
59_23	Matthew Frith, London Wildlife Trust	<p>Recognise the Local Green Space proposal on the retained allotments but object to the education allocation as above and also raises concerns that the proposal disregards The London Plan Policy 7.22 which states that Boroughs should protect existing allotments'.</p> <p>The Council should be seeking to protect and enhance these allotments for their community and environmental benefits.</p>	As covered in responses above	No modification
45_1	Mary Dawe, Bromley Common Allotment Gardens Association	Appendix 10.4 'Education Site Allocations' cross references to Local Green Space Appendix 10.8 site no. 23. This should read Appendices 10.8 site no.65.	<p>Error noted and correction proposed</p> <p><i>"Appendix 10.4 ...Site 32 Turpington Lane, Bromley Common...Note allotments to the north of the site, outside the area allocated for education to be designated as Local Green Space (Appendix 10.8 site no 23 65)"</i></p> <p>See also minor modification proposed to Policies Map Set Part 2 Site 27</p>	<u>Minor Modification</u>
Education Site 33 – St Hugh's Playing Field				
58_15	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	The Bullers Wood Boys School received consent from the Secretary of State for Education to open in September 2017 specifically referencing this school owned Urban Open Space site. A recent application determined in light of the currently adopted plan (UDP) was refused on highways grounds but given the accepted need for provision the and invited a further application to address the highways concerns. The proposed opening date has now been delayed to September 2018, and	No modification

			<p>should a new application be submitted the timeframe is likely to be such that it will also be considered in light of the adopted plan (Bromley Unitary Development Plan 2006).</p> <p>If the delay is such that an application is made post Local Plan adoption it would be considered in light of the Local Plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resists the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision.</p> <p>Should the Council be minded to grant planning permission where Sport England object, such applications are referred to the Secretary of State.</p>	
38_12	Alice Roberts, CPRE London	<p>The allocation of this site for development effectively opens the way for the loss of protected green space - designated Urban Open Space. The council should change the site boundaries so that it does not include any green space and instead only includes already developed land. It should consider increasing capacity at the school by increasing buildings' height and using brownfield areas on site.</p>	<p>The site is designated Urban Open Space in education use. The allocation within UOS enables Free School providers to develop appropriate designs which minimise the impact on the retained open space in line with draft Policy 55 Urban Open Space. There is inadequate capacity at Bullers Wood Girls School (itself on designated UOS) to provide the necessary educational development.</p>	No modification
164_1	Ross Jones	<p>Objects to allocation of St Hugh's playing field and consider that the detail of the recent application, (as highlighted in this and other responses below) demonstrates the unacceptability of the site.</p> <p>Note that response to previous consultation representations on this allocation recognised that at planning application stage there would need to be an assessment of the highways implications, minimising/mitigating the loss of trees subject to a</p>	<p>The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) and the methodology for site selection resulting in the allocation of the St Hugh's Playing Field site.</p> <p>A planning application for a secondary school on this site has recently been refused on highways grounds but with a recommendation that a further application would be welcomed (detailed above) Should objections by Sport England be</p>	No modification

		blanket TPO and seeking the views of Sport England and inferred if such assessments showed that development was not appropriate on this site that the allocation would be abandoned.	maintained in any subsequent application that the Council was minded to permit, the application would be referred to the Secretary of State. Irrespective of the acceptability of any particular education proposal the allocation would not be deleted unless it were considered that an appropriate scheme could not be delivered over the Local Plan period. Other matters of specific detail of the recent application are covered in responses below	
76_4	Michael Bird and Tracey Cummings	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above Suggest that the Civic Centre and Widmore Centre should be used. Suggest that Green Belt and MOL sites should be given proper consideration, rather than being discounted at an early stage because of their policy designations.	As covered in responses above. The development of the draft Local Plan involved an assessment of the potential of both sites. The Civic Centre is proposed for allocation for other strategic needs of the plan (mixed use including housing). The Widmore Centre, is indicated as offering potential as either a primary or secondary school. It is intended that La Fontaine Primary School will be located permanently on that site from September 2017. The NPPF requires that "exceptional circumstances" be demonstrated to justify the release of Green Belt (and MOL, by virtue of London Plan Policy 7.17). A sequential approach to site selection has therefore been taken.	No modification
82_1	Jenny Ding	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above and additionally raises negative local impacts relating to the recent application <ul style="list-style-type: none"> • increased traffic, road safety issues and parking difficulties • loss of open space in an Area of Open Space Deficiency and • loss of existing playing fields which Sport England has objected • unacceptable loss of residential amenity. Suggests that if the need for education is proven a more thorough examination of other sites included in the Education Background Paper in particular, the Widmore Centre or the Bromley Civic Centre	As covered in responses above. Re the area of Open Space Deficiency designation, which affects the surrounding residential roads and the access road to the west of the site does not affect the vast majority of the proposed allocation. Any development as a result of the allocation will, by virtue of draft Policy 28 be encouraged to involve the sharing of facilities (including currently private open space facilities) will assist in addressing the open space deficiency experienced by surrounding dwellings.	No modification

		to build on the limited green space in our area.		
105_1	Cherry Slater	<p>Objects to allocation of St Hugh's Playing Field on a number of grounds covered above and additionally raises:</p> <ul style="list-style-type: none"> • Questionable need for a new school in this area. • Unsuitable road network (for construction and thereafter) - traffic congestion, road safety issues and increased air pollution. • Non educational use of Community Sports Hall in the proposed development. 	<p>As covered in responses above, and additionally,</p> <p>The Local Plan evidence base identifies the need for secondary education in the north west and centre of the Borough and assessed all potential sites using a sequential test methodology which supports the allocation of this site.</p> <p>The recent planning application was refused on highways grounds but the Council was satisfied that the arrangements for the community use of the school facilities in that application did not warrant a reason for refusal under the adopted plan (UDP) Any application coming forward post Local Plan adoption will be considered on its merits in light of draft Policy 28 Education Facilities relating to the privacy and amenities of any adjoining properties and the encouragement of dual use.</p>	No modification
107_1	Keith Adams	<p>Objects to allocation of St Hugh's Playing Field on a number of grounds covered above and additionally raises</p> <ul style="list-style-type: none"> • Parking difficulties in the whole area / increased difficulty for emergency services • Overriding local negative impacts • Loss of residential amenities with the school being so close to Chislehurst Rd and Hill Brow • Mayoral concerns regarding the loss of playing fields and urban open space with this/any development on this site • should be protected as a very important local amenity. 	<p>As covered in responses above, and additionally, Whilst refusing the recent planning application on highways grounds (detailed above), when considered in light of the accepted need for secondary education the Council were otherwise satisfied with a school on this site.</p> <p>The GLA representation is responded to above.</p> <p>The proposed UOS policy 55 requires that the impact on the open nature of the site be limited as far as possible without compromising educational requirements. The site is within the ownership and control of Bullers Wood Girls School. Existing, and emerging local planning policy require re-provision of affected community facilities - the recently refused application proposed the relocation of Air Force Cadets to girls' school site during construction and the proposed school once completed.</p>	No modification
103_1	Lindy Springett	<p>Objects to allocation of St Hugh's Playing Field on a number of grounds covered above and additionally suggests that St Hugh's Playing Field</p>	<p>As covered in responses above, and additionally</p> <p>The Council consulted on Local Green Space in</p>	No modification

		should be Local Green Space	early 2016 at which time St Hugh's Playing Fields wasn't nominated for the designation by any relevant interest groups. As a result the site was not assessed against Bromley's Local Criteria for the designation of Local Green Space.	
127_1	John Tiley	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above	As covered in responses above.	No modification
106_1	David Black	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above	As covered in responses above.	No modification
131_2	Gillian Bailey	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
139_1	Susan Savage	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
144_1	Alan and Linda Howes	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
145_1	Joan and Graeme Shankland	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
154_1	Michele Crisp	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above	As covered in responses above.	No modification
162_1	Sandeep Kohli	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
9_1	Mrs L Upton	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above	As covered in responses above.	No modification
37_1	Mr Peter Allsop	Objects to allocation of St Hugh's Playing Field on a number of grounds covered above.	As covered in responses above.	No modification
Education Site 34 - Scotts Park Primary School				
38_18	Alice Roberts, CPRE London	The proposal does not adhere to regional policy for MOL re-designation as it has not demonstrated very special circumstance or provided a full investigation of alternative sites (see general points made under Supporting Communities above) and the site continues to fulfil its purpose as MOL. The removal of the MOL designation increases the threat to the playing fields and biodiversity value of this site.	The NPPF sets out the circumstances for de designating Green Belt, similarly applicable to MOL by virtue of London Plan Policy 7.17. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control). The allocation has been amended and reduced in size since originally proposed in the Draft	No modification

			Allocations document Sept 2015 to minimise the harm to MOL. Impacts on existing sports provision will be addressed through any planning applications. The reduced allocation focuses on area of hardsurfacing playground and excludes playing fields. Any proposal would be required to address policies in the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play which resists the loss of sports and recreation unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	
58_16	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	As covered in responses above, with regard to the land for sports. (Note Playing field excluded from the proposed allocation)	No modification
Education Site 35 – Castlecombe Primary School				
38_14	Alice Roberts, CPRE London	The proposal does not adhere to regional policy for MOL re-designation as it has not demonstrated very special circumstance or provided a full investigation of alternative sites (see general points made under Supporting Communities above) and the site continues to fulfil its purpose as MOL.	The NPPF sets out the circumstances for de designating Green Belt, similarly applicable to MOL by virtue of London Plan Policy 7.17. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control).	No modification

			<p>Castlecombe Primary is located in Education Planning Area 6 which includes 2 Infant (Key Stage 1) schools, each with a single FE from reception to year 2. Additionally planning permission has been granted for expansion to the primary school to accommodate the Key Stage 2 children (single class per year) as they leave Dorset Road Infants at the end of year 2. NB this expansion does not provide an additional FE.</p> <p>The Council are in conversation with the nearby 3FE Redhill Primary Academy to assess their willingness to adsorb the Key Stage 2 (KS2) years 3 – 6 (children aged 7 – 11yrs) from Mead Road Infants School. Again this expansion does not provide an additional FE.</p> <p>The allocation has been amended and reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the harm to MOL.</p>	
58_17	Dale Greetham, Sport England	<p>The removal of the MOL designation increases the risk that the planned future development will reduce the amount of open space available to children at these schools and the youth centre.</p> <p>Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.</p>	<p>As covered in responses above, additionally impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.</p>	No modification
59_24	Matthew Frith, London Wildlife Trust	<p>Proposed boundary does not fit the school grounds appropriately with some areas of open greenspace being removed while some parts of that same surface are being retained.</p>	<p>As covered in responses above. Note the reduced allocation has been revised to minimise the re designated area whilst facilitating future expansion of the academy school and producing a</p>	No modification

			defensible boundary.	
Education Site 36 - Land at Bushell Way				
99_1	Miranda Spatchurst	Supports development of primary school on the site.	Support welcomed	No modification
38_10	Alice Roberts, CPRE London	The removal of the Urban Open Space designation on Whyte's Woodland SINC, a remnant of ancient woodland, and its allocation for a new school threatens the biodiversity of the site and its recreational use by the local community and would lead to the loss of an important ancient site and attendant biodiversity. The proposal does not adhere to national and regional policy, including the London Plan, which states that proposals should 'avoid adverse impacts on sites with biodiversity value' (Policy 7.19).	<p>The UOS designation is retained and there is no loss of ancient woodland (Whyte's Wood and Bird Sanctuary south of Walden Recreation Ground).</p> <p>The allocation lies within the SINC (Grade II Borough Importance) which includes the ancient woodland but the Draft Allocations document Sept 2015 indicated an allocation within the area to the north of Walden Recreation Ground which the SINC Citation describes as "a sizeable area of recent secondary woodland". Woodland is, by definition, recognised as a Bromley Biodiversity Action Plan BAP habitat.</p> <p>The precise allocation (within the wider secondary woodland identified in the 2015 consultation) has been proposed on the basis of two preliminary studies of Walden Woods (Ecological Appraisal January 2016 and follow up Ecological Assessment July 2016) which assessed the ecological value across this area of secondary woodland. It noted that ruderal areas although of some value ecologically are common habitats and are of less value than woodland areas and that areas of Japanese knotweed are of negative ecological value. The assessment indicated that the impact of any development could be partially mitigated by concentrating development into ruderal and knotweed areas and that the loss of woodland edge habitats around ruderal glades could be partly compensated for by opening out some woodland areas in remaining woodland to create greater diversity of light levels and woodland structure.</p> <p>The allocation focuses on ruderal and knotweed areas and para 3.3.53 requires developments to mitigate impacts on biodiversity, minimise the impact on trees and ensure a buffer to adjacent</p>	No modification

			properties. The majority of the SINC area, including Walden's Wood, Whyte's Wood, the Bird Sanctuary and Walden and Chislehurst recreation grounds is proposed to be designated as Local Green Space (Site 48) having special qualities which hold particular significance for the local community.	
59_25	Matthew Frith, London Wildlife Trust	<p>Acknowledge para 3.3.53 but concern regarding the removal of the Urban Open Space from Whyte's Woodland & Walden Recreation Ground SINC (ByBII02), largely a remnant of ancient woodland.</p> <p>Adherence to national and regional policy, including The London Plan, which states that proposals should 'avoid adverse impacts on sites with biodiversity value' (Policy 7.19).</p> <p>Concern regarding threats to the biodiversity of the site and its recreational use by the local community.</p> <p>The southern part of the proposed school grounds is woodland being managed by a local group. We recommend altering the south-east of the school site boundary north-westwards to leave the integrity of the woodland SINC intact, and that any proposals submitted robustly address likely impacts on and off site (including, for example, light pollution).</p>	<p>As covered in responses above.</p> <p>The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) outlining the need for education and the lack of appropriate sites, such that allocations have also been proposed which entail the re designation from Green Belt / MOL to Urban Open Space. The assessments undertaken have ensured that the allocation is made in an area of low / no ecological value. Engagement with the local community also informed the precise location of the allocation which avoids woodland "Walden Woods" which is being managed by the local community. Para 3.3.53 requires proposals to maintain and enhance public access from the Bushell Way entrance through to Walden Woods.</p>	No modification
42_1	Alison Stammers, Friends of Chislehurst Recreation Grounds	<p>Not convinced that the amount of space now shown would be required (the area is not stated in the consultation document).</p> <p>Would like detail of the mitigation required by para 3.3.53..</p>	<p>Allocation size determined on the basis of 0.5ha providing sufficient space for an appropriately designed 2 FE primary school (based on the provision of existing similar infrastructure in Bromley). The proposed allocation is approximately 0.85ha (as set out in the evidence base - Education Background Paper 2016) providing a reasonable allowance for the necessary mitigation (tree buffer and public access) required by para 3.3.35.</p> <p>Current education legislation requires that new schools are academy free schools (outside local</p>	No modification

		<p>Concern that a two storey building may compromise the listed view over The City and Docklands from Walden Recreation Ground (Policy 48) and request a plan to restore the view which has been neglected in recent years and is now more or less obscured, even in winter.</p> <p>Pleased to see the designation of Local Green Space for the rest of Walden Woods and for all of Chislehurst & Walden Recreation Grounds and Whytes Wood.</p>	<p>authority control). The precise design of any planning application for a school will therefore be a matter for the free school providers. Proposals will remain subject to the normal planning application process and be determined in light of the Local Plan, including Policy 48 'Skyline' with the development plan and other</p> <p>Initial site survey work undertaken by the council indicates a significant fall in height of over 15m from the Walden Recreation Ground which is at a height of 95m above sea level. It will however be for the school providers to develop an appropriate design.</p> <p>Support for the Local Green Space welcomed</p>	
71_8	Tony Allen, The Chislehurst Society	Concerns regarding the allocation as above	As covered in responses above.	No modification
129_1	Maria Martinez	Concerns about allocations as woods are home to wildlife and should remain natural open space.	As indicated above the allocation focuses on ruderal and knotweed areas minimising impacts on wildlife.	No modification
6_1	John King	<p>Contradicts other sections of the plan.</p> <ul style="list-style-type: none"> • Protection of green spaces, woodland (Walden Wood) and views (Canary Wharf from the recreation ground) • This area makes a vital contribution to the green character of Chislehurst. <p>Recognise need for more school places but suggest use of existing nearby education land (Red Hill School)</p>	<p>The proposed allocation, which is proposed following a sequential search for preferable sites, is contrary to existing UDP policy for UOS but will come forward as part of a wholly new plan. The careful selection of the allocation coupled with the requirement for a buffer to residential properties and the enhancement of the access through to the "Walden Woods" are minimise the impact on the green character of the area.</p> <p>Any planning application brought forward on the allocation will be considered in light of all relevant policies, including the specific requirements within the education policies and the general local plan policies relating to open space, biodiversity, views etc.</p> <p>Acknowledgment of the need is welcomed. The Local Plan process involved a sequential assessment of potential education land. The</p>	No modification

			nearby Red Hill School playing fields form part of the same extent of Urban Open Space as the proposed allocation. Red Hill School is already a 3 FE school with associated nursery and, as an academy is outside Local Authority control.	
150_1	Clare Manzi	Objects to allocation a Bushell Way on a number of grounds covered above	As covered in responses above.	No modification
194_1	Rachel Evans	<p>Concern about the impact on</p> <ul style="list-style-type: none"> • local enjoyment of the woods and adjacent recreation grounds • wildlife. • future developments on further local Green Space land. <p>Considers there are enough schools, particularly primary schools in the immediate area, which cause</p> <ul style="list-style-type: none"> • numerous traffic issues • substantial anti-social behaviour problems from older children 	<p>As covered in responses above, additionally</p> <p>The bulk of the Urban Open Space (excluding the education allocation) is proposed for designation as Local Green Space, having special qualities which hold particular significance for the local community, and giving it protection consistent with that in respect of Green Belt.</p> <p>The need for provision is set out in the Local Plan evidence base. Concerns regarding the impact of existing provision are noted.</p>	No modification
15_2	Roy Beamont	<p>Concerned about the impact on ancient green field woodlands and the change to the character of the area.</p> <p>Particular concerns relating to already permitted developments and the proposed allocation for a school regarding</p> <ul style="list-style-type: none"> • Highway safety of Bushell Way / Whitehorse Hill junction • traffic and parking <p>Suggest that there would be more suitable open places to build a school</p> <p>Less favoured that the “previous proposal” which had more access.</p>	<p>As covered in responses above, additionally</p> <p>Draft Policy 29 “Education Site Allocations” requires planning applications to provide robust assessments of the impacts of development, including for example highways implications, and provide appropriate mitigation to address adverse impacts.</p> <p>Assume the “previous proposal” relates to the wider area identified in the 2015 consultation within which an allocation would be made. The precise allocation was proposed on the basis of analysis outlined in responses above.</p>	No modification
167_1	Elizabeth Hayward	<p>Objects to allocation a Bushell Way on a number of grounds covered above, additionally concern about the impact of such development on open spaces on</p> <ul style="list-style-type: none"> • mental health • the messages to children about global warming, conservation and the respect of our 	<p>As covered in responses above, additionally the availability of school places impacts on the education of children and the mental health of children and parents.</p> <p>The development of the Local Plan, and the methodology to deliver sites accord with the National Planning Policy Framework, which has at its heart the presumption in favour of sustainable</p>	

		planet	development.	
29_1	Mrs Malcolm Hill	<p>Concerned about the cumulative build up of traffic which would worsen if the school was built development on the woodland (unclear about the amount of land allocated) and impact on wildlife and community use additional traffic the historic sale of education land (eg Ravensbourne College of Art)</p> <p>Queries whether the land was gifted to the people of Chislehurst.</p>	<p>As covered in responses above, additionally</p> <p>Whilst previous losses of education land cannot be reversed draft Policy 27 safeguards current education land and proposed allocations for education purposes for the period of the Local Plan.</p> <p>The land is in council ownership.</p>	No modification
33_1	Mr Andrew Hayward	<p>Concerns with regard to the allocation on a number of grounds covered above, also with specific reference to the Green Chain Walk.</p>	<p>As covered in responses above, additionally the requirement to maintain and enhance public access from Bushell Way and the Local Green Space designation proposed for the remainder of the wider site supports the Green Chain Walk.</p>	No modification
137_2	Andrew Johnson, Bushell Way Residents Association	<p>Notes that previous concerns about maintaining biodiversity on this site, and the need to maintain a public right of way past it to Walden Woods have been acknowledged.</p> <p>Highway concerns regarding the allocation as outlined in various responses above and suggests mitigation, without which the educational use should not be sanctioned</p> <ul style="list-style-type: none"> • extending no parking restrictions on White Horse Hill either side of the junction to improve sight lines • offering parking space on the Banbury House site to residents on White Horse Hill without off-road parking • introducing a mini-roundabout or traffic signals at the junction. <p>Reassurance is also sought regarding mandatory drainage measures to prevent run-off under storm conditions into adjoining areas.</p> <p>Bushell Way Residents Association (BWRA), a resident controlled management company with responsibilities for Stead Close and 2-2e Bushell Way, request cooperation on issues regarding the local plan and its implementation.</p>	<p>As noted the enhancement of the public access is required by para 3.3.53.</p> <p>Any planning application will be subject to Draft Policy 29 "Education Site Allocations" which requires planning applications to provide robust assessments of the impacts of development, including for example highways implications, and provide appropriate mitigation to address adverse impacts, however, in advance of any application and assessment it is not possible to confirm the detail of necessary mitigation. Similarly applications will be subject to draft policies 115 'Reducing Flood Risk' and 116 'Sustainable Urban Drainage Systems (SUDS)'.</p> <p>Having registered on the consultation portal BWRA will receive automatic updates enabling it to engage with the evolving plan. Planning applications involve consultation with local residents and are listed publicly.</p>	No modification

2_1	Mr & Mrs Hopgood	Concerns with regard to the allocation on a number of grounds covered in various responses above.	As covered in responses above	No modification
72_1	Mr and Mrs Hutchinson	Concerns with regard to the allocation on a number of grounds covered in various responses above., and understood that the original plans has been some sort of mistake.	As covered in responses above, additionally the 2015 document, which identified an wider area, consulted on an "Allocation within this Urban Open Space for primary education..." The larger area was not consulted on in error, rather it indicated that an allocation was proposed within it. There was no intention to allocate the larger area and following the 2015 consultation and site analysis, including two ecological studies, the allocation as identified in the most recent 2016 consultation was proposed.	No modification
130_1	Andrew Pope	<p>Concerns with regard to the allocation on a number of grounds covered in various responses above.</p> <p>Additionally considers that the 'allocation' is not compliant with the provisions of NPPF Chapter 11.</p> <p>It is (all) important natural urban green infrastructure and should remain so.</p> <p>Land for 'education purposes' is not justified or needed.</p> <p>All of this ground should remain Local Green Space.</p> <p>.</p>	<p>As covered in responses above.</p> <p>Additionally, the NPPF provides advice for the preparation of plans to meet development needs notably Chapter 11 (Conserving and enhancing the natural environment), paras 110 – 112 make clear that plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework. The local plan has taken a sequential approach to the allocation of sites and undertaken studies to ensure that the proposed allocation has the least environmental or amenity value.</p> <p>The Local Plan evidence base, which draws on the Council's approved Primary Schools Development Plan, sets out the need for primary education.</p> <p>Local Green Space (LGS) is a new designation which will come into force through the Local Plan. Whilst there is no current LGS designation, the significant remaining area of SINC is proposed to be additionally designated as LGS.</p>	No modification
141_1	Joanne Smith	<p>Concerns with regard to the allocation on a number of grounds covered in various responses above.</p> <p>Additionally concerned regarding</p> <ul style="list-style-type: none"> • lack of consultation 	<p>As covered in responses above.</p> <p>Additionally, consultation letters were sent to addresses within 100m of proposed allocations as part of both the 2015 and 2016 consultations which led to a significant local campaign of awareness from local groups.</p>	No modification

		<ul style="list-style-type: none"> • the value of the “Cowpath” • contamination risk from former dumping activity • damage to road surfaces from construction vehicles <p>Suggests a bike or exercise trail through the woods</p> <p>Additional concerns relating to housing development public realm clutter and “housing association” design.</p>	<p>The Cowpath lies to the southern side of the wider area illustrated in the 2015 consultation but outside, and is unaffected by the allocation.</p> <p>Draft Policy 118 ‘Contaminated Land’ requires site investigations and remedial action where development is proposed on land which is contaminated or suspected of being contaminated.</p> <p>The Council proactively seeks information from the public on its website to address road or pavement problems. Draft policy 37 clause f) requires sustainable design and construction and draft policy 133 ‘Waste Management in New Development’ requires developers to produce site waste management plans.</p> <p>The appropriate enhancement of outdoor sport and recreation facilities is supported by draft policy 58 ‘Outdoor Sport, Recreation and Play’</p> <p>The allocation is defined as ‘Education Land’ by virtue of draft Policy 28 and safeguarded for education purposes over the Local Plan period. There is no allocation for housing.</p>	
142_1	Andrew and Kate Brown	Objects to allocation a Bushell Way on a number of grounds covered above	As covered in responses above.	No modification

171_1	Mrs R Norton	<p>Objects to allocation a Bushell Way on a number of grounds covered above.</p> <p>Additionally concern that there appears to be no mention of the Ecological Surveys done during 2016 which indicate that this is a valuable good quality area for flora and as a nesting habitat for birds, small mammals and reptiles, reptiles being classified as Species of Principle Importance under the NERC Act 2006.</p> <p>The area is also suggested to have potential for foraging and for supporting hedgehogs during hibernation and to prevent them becoming extinct, hence we have been asked nationally to look out for hedgehogs and do our best to protect them.</p> <p>The survey recommended a further survey on bat activity, breeding birds and reptiles but I have not found any reference that this was in fact carried out?</p> <p>Concern that alternative have not been explored (as required by para 3.3.7)</p> <ul style="list-style-type: none"> • redundant infrastructure premises (specifically the vacant area by St Nicholas School) • the former Ravensbourne College redevelopment for residential use was a very short-sighted decision? • Red Hill Playing fields <p>Concern about the impact on access to open space for free exercise for a range of physical and mental health issues.</p>	<p>As covered in responses above.</p> <p>The ecological surveys, which form part of the Local Plan evidence base, informed the location of the allocation to the area with the least environmental or amenity value and the adjacent . Local Green Space designation.</p> <p>The SINC designation remains and in addition to the requirement in para 3.3.53 to mitigate impacts on biodiversity any planning application will be required to address the requirements of other plan policies including draft policies 69 'Development and Nature Conservation Sites' 70 'Wildlife Features' and 72 'Protected Species'.</p> <p>The allocation of sites has followed a sequential methodology to determine preferable sites</p> <p>The land adjacent to St Nicholas is is Green Belt, SINC and within the Conservation Area. It is also privately owned "Common Land" with development prohibited by bylaws made under the Metropolitan Commons (Chislehurst and St. Paul's Cray) Supplemental Act, 1888.</p> <p>Noted, however the site is now developed for residential.</p> <p>As covered in responses above</p> <p>Para 3.3.53 seeks to enhance public access from Bushell Way (currently overgrown and uninviting) which should encourage access to open space for exercise and the health benefits referred to.</p>	
172_2	Mr Trevor Palmer	Objects to allocation a Bushell Way on a number	As covered in responses above.	No modification

		of grounds covered above.		
14_1	Paul Cahalan	Concerned about the nature of the consultation by letter without a plain English explanation of the proposal merely pointing to the online consultation or requiring a visit to a library, problematic for those who are not computer literate or have mobility issues.	The consultation letter provided a direct dial telephone number to the Local Plan team to assist those seeking further advice regarding the proposed allocations.	No modification
Education Site 37 - Land adjacent to Edgebury Primary School				
38_13	Alice Roberts, CPRE London	Has not demonstrated very special circumstances for change to Green Belt. Threatens playing fields.	<p>The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley, the open space protections afforded to existing schools and the lack of appropriate sites. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control).</p> <p>The allocation has been amended and reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the Green Belt. Impacts on existing sports provision will be addressed through any planning applications. Sports England will be consulted on any planning applications affecting playing fields and any proposal would be required to address policies in the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play (which reflects para 74 of the NPPF).</p>	
59_26	Matthew Frith, London Wildlife Trust	As an area of diverse grassland adjoined to Green Belt it is unclear how this no longer meets Green Belt criteria.	As covered in response above, the Local Plan sets out its approach to meeting need and the absence of deliverable sites. The NPPF provides advice for the preparation of plans to meet development needs notably in Chapter 8 paras 83 - 85 with regard to Green Belt and Chapter 11 'Conserving and enhancing the natural environment', paras 110 – 112. The NPPF is clear that where plans propose allocations they	No modification

			<p>should select land with the least environmental or amenity value, where consistent with other policies in this Framework.</p> <p>Need, consistent with the requirement for “exceptional circumstances” having been demonstrated, the local plan assessed this site in terms of its contribution to and enhancement of the natural and local environment, in line with NPPF Chapter 11.</p> <p>The site which has a covenant for education use having been allocated several decades ago an education site in the Initial Development Plan, The site, which includes stabling and is grazed by horses is physically separated from “the countryside” by the adjacent primary school. It has an agricultural classification of “Urban” and is considered to have low environmental and amenity value.</p>	
71_9	Tony Allen, The Chislehurst Society	Dimensions of sites not stated	Allocation dimensions are set out in the evidence base, however, correction to 2ha required to the dimensions quoted which reflect larger site 8ha proposed site in the 2015 consultation rather than the reduced site area allocated in the draft Local Plan 2016.	No modification
Education Site 38 - Edgebury Primary				
58_18	Dale Greetham, Sport England	Sport England’s Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly	No modification

			outweighs the loss.	
38_15	Alice Roberts, CPRE London	Threatens playing fields. Has not demonstrated very special circumstances for change to Green Belt.	As above covered in response above. The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control) The allocation has been amended and reduced in size since originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the Green Belt.	No modification
Education Site 39 - Midfield Primary School				
58_19	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
38_9	Alice Roberts, CPRE London	Threatens playing fields. Has not demonstrated very special circumstances for change to Green Belt.	As above covered in response above The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 –	No modification

			<p>3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control)</p> <p>The allocation has been amended and reduced in size, focusing more tightly around the existing built development, than the re-designation originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the Green Belt.</p>	
59_27	Matthew Frith, London Wildlife Trust	Could be reconfigured to fit the grounds more appropriately.	The allocation seeks to minimise the area redesignated from Green Belt whilst facilitating necessary future expansion. The proposed boundary has been developed in light of NPPF para 85 but is to a large extent dictated by the existing built development on the site.	No modification
Education Site 40 - St Mary Cray Primary School				
58_20	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
38_19	Alice Roberts, CPRE London	Threatens playing fields. Has not demonstrated very special circumstances for change to Green Belt.	As above covered in response above. The NPPF sets out the circumstances for designating Green Belt. The Local Plan sets out	No modification

			<p>its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control)</p> <p>The school is on a constrained site, with the existing built fabric of this 1 FE school locally listed and sited within the conservation area.</p>	
59_28	Matthew Frith, London Wildlife Trust	Objects to de-designation because the site consists of largely open grassland and is adjoined to Green Belt.	The land is primary school grounds. As above covered in response above the Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48).	No modification
Education Site 41 - Wickham Common				
58_21	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
38_20	Alice Roberts, CPRE London	<p>Threatens playing fields.</p> <p>Has not demonstrated very special circumstances for change to Green Belt.</p>	<p>As above covered in response above.</p> <p>The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an</p>	No modification

			<p>assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control)</p> <p>The allocation has been amended and reduced in size, focusing more tightly around the existing built development, than the re-designation originally proposed in the Draft Allocations document Sept 2015 to minimise the impact on the Green Belt.</p>	
Education Site 42 - Oaklands Primary School				
58_22	Dale Greetham, Sport England	Sport England's Planning Policy Objective 1 aims to prevent the loss of sports facilities and land along with access to natural resources used for sport. A site allocation and development on the playing field aspect of sites which do not accord with the policy would contravene Para 74 of the NPPF.	Impacts on existing sports provision will be addressed through any planning applications . Any proposal would be considered in light of the local plan as a whole including Local Plan Draft Policy 58 Outdoor Sports Recreation and Play, which resist the loss of sports, recreation and playing fields unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements and, reflecting para 74 of the NPPF in clause b) indicates that, where outdoor sport and recreation facilities are being enhanced any loss from a proposed development is re-provided to an equivalent or higher standard in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.	No modification
38_17	Alice Roberts, CPRE London	Threatens playing fields. Has not demonstrated very special circumstances for change to Green Belt.	As above covered in response above. The NPPF sets out the circumstances for de designating Green Belt. The Local Plan sets out its approach to meeting need (paras 3.3.24 – 3.3.48) addressing exceptional circumstances, relating to the current and future demand in Bromley. The methodology involved an assessment of all alternatives, including existing education infrastructure much of which already has open space protection (1/3 Green Belt / MOL) and the majority of which, are academised (outside Local Authority control)	No modification

			The allocation has been amended and reduced in size to minimise the impact on the Green Belt, from that originally proposed for re-designation in the Draft Allocations document Sept 2015. The reduced allocation reflects the extent of a recently permitted scheme to deliver capacity for the existing Published Admissions Number (PAN) of 3 FE. Development has not commenced on site.	
59_29	Matthew Frith, London Wildlife Trust	Could be reconfigured to fit the school grounds more appropriately not remove as much open grassland from Green Belt.	The allocation seeks to minimise the area redesignated from Green Belt whilst facilitating necessary expansion. The proposed boundary has been developed in light of NPPF para 85 and with regard to deliverable development on this heavily contoured site.	No modification

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

Chapter 4 – Getting Around (Transport and Accessibility)

DLP no.	Representor	Summary of response	Officer comment	Recommendation
SChapter 4 – Getting Around (Transport and Accessibility)				
3_1	Barbara McKeown	Bromley has become very congested and there are significant problems around the Chatterton Road area due to increased development (one of which was won on appeal). This is causing additional problems for residents and the environment due to an increase in on-road parking.	The application that was granted on appeal was recommended for refusal in line with the Council's parking policy. The draft parking policy works to address parking pressures in the Borough, and ensure that any new development does not generate intrusive on-street parking.	No modification.
80_4	Labour Group	Transport pressures in the Borough are described as peak time congestion and high car dependency. This contradicts paragraph 1.3.16 which states that moving around is easier due to improved public transport and reduced congestion. On what are these statements based?	Improvements have been made to the transport network (para 1.3.16) through the application of existing policies and the draft Getting Around chapter addresses new challenges that need to be addressed over the plan period. Transport pressures in the Borough were identified in the Local Implementation Plan (2012) following the publication of TfL's South Sub-Regional Transport Plan in 2010. "Challenges and Opportunities" were identified and developed through interpretation of the Mayor's Transport Strategy which outlines relevant issues the draft transport policies seek to address.	No modification.
143_5	Bob Neill MP	The effort to improve transport routes in areas such as Sundridge Park Railway Station is supported.	Support welcomed.	No modification.
151_5	Ann Garrett for Bromley Friends of the Earth	The Local Plan is broadly unsound because it will put pressure on transport, traffic, and parking.	The purpose of the draft transport policies is to address and mitigate any potential issues that arise from proposed development within the Borough.	No modification.
152_3	John Street for Bromley Green Party	The Local Plan is broadly unsound because it will put pressure on transport, traffic, and parking.	The purpose of the draft transport policies is to address and mitigate any potential issues that arise from proposed development within the Borough.	No modification.
153_3	Chris Taylor for Orpington Labour Party	Issues surrounding public transport have not received sufficient attention. The Plan should provide support for the extension of the Northern Line into the north of the Borough.	TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this is outside the life of the draft Local Plan. However, Metroisation of services may influence any future phase.	No modification.
157_5	Senaka Weeraman	Will the Tram line extension run through Crystal Palace Park?	There are currently no plans in place outlining the route of the tram line extension, but is not	No modification.

			expected to run through Crystal Palace Park.	
Policy 30 – Parking				
36_5	Aberdeen Assets Management	The approach to parking as set out in the policy is supported, and is deemed to reflect the London Plan standards. The Council have taken into account criteria set out by the NPPF (paragraph 39) in relation to setting local parking standards.	Support is welcomed.	No modification.
39_1	Andrew Dorrian, Transport for London (& Greater London Authority)	<p>Policy does not comply with LP 6.13. Removal of minimum requirement from PTAL 2 to 6a is suggested.</p> <p>Reference to minimum car club threshold should also be removed.</p> <p>Clarity is needed for how the policy would be applied to units larger than 3 bedrooms, and whether the LP standards would apply for all other uses where standards exist.</p>	<p>The Council acknowledges that relaxation of the London Plan parking standards will only apply in certain locations within PTAL 2 and that this will be reliant upon a robust case being made to justify the standards. This will be determined on a case by case basis.</p> <p>The minimum parking required in the draft policy is supported by the Parking Standards Background Paper (2016).</p> <p>Research shows that car clubs work better in areas with good public transport provision and do not fit parts of PTAL 3 and low PTAL areas of 2 and below so could not be seen as a means of reducing car usage and ownership in those locations.</p> <p>Column in Table 1 relating to 4+ bedroom standards was omitted in error (see attachment). The correct parking standards table went out to consult in the Draft Allocations, Further Policies and Designations Document (2015) and was included in the Parking Standards Evidence Base (2016). The London Plan standards will apply for parking for all other types of development.</p>	<u>Minor modification to correct omission.</u>
61_5	Kieran Wheeler, Savills for Bellway Homes	(Maybrey Works) Amend the policy to encourage lower car ownership and provide clarity as to how the policy will be applied in light of Member opinions on parking provisions. There is also need to clarify Council's wheelchair parking and electric vehicle charging point requirements. The policy should reflect the maximum standards in the London Plan.	<p>It is acknowledged within the policy that parking proposals will only be supported where they do not undermine other draft policies to encourage walking, cycling, and public transport use.</p> <p>Wheelchair parking requirements should be in compliance with the standards outlined in the London Plan (every designated wheelchair accessible dwelling should have a car parking space that complies with Part M4(3)). Draft Policy 30c states that 1 in 5 car parking spaces should have provision (both active and passive) for</p>	No modification.

			electric vehicle charging points.	
66_2	Victoria Barrett NLP for LaSalle Investment Management	Amendment on large regional retail parking standards is supported.	Support welcomed.	No modification.
96_1	Simon Fowler, GVA	The blanket application of minimum parking requirement is both unreasonable and onerous. It does not accord with principles set out in the London Plan and NPPF and should not be adopted on this basis.	The parking standards included in Table 1 reflect the Borough's local circumstances. These standards are in line with the London Plan (paragraphs 6.42i-k) which allows Outer London Boroughs greater parking provision in new residential developments with low PTALs (0-1 and parts of 2*), assessed on a case by case basis. The policy also takes into account criteria set out by the NPPF paragraph 39, which encourages local authorities to develop their own parking standards. The Parking Standards Background paper (2016) forms the evidence base which supports the parking policy, and can be found on the consultation portal.	No modification.
134_6	Chris Francis, West and Partners for Dylon 2 Ltd	The Parking Standards set out in the Draft Plan are not in conformity with Policy 6.13 E of the London Plan as they set minimum standards.	The parking standards included in Table 1 reflect the Borough's local circumstances. These standards are in line with the London Plan (paragraphs 6.42i-k) which allows Outer London Boroughs greater parking provision in new residential developments with low PTALs (0-1 and parts of 2*), assessed on a case by case basis. The policy also takes into account criteria set out by the NPPF paragraph 39, which encourages local authorities to develop their own parking standards. The Parking Standards Background paper (2016) forms the evidence base which supports the parking policy, and can be found on the consultation portal.	No modification.
135_6	Chris Francis, West and Partners for Relta Ltd	The Parking Standards set out in the Draft Plan are not in conformity with Policy 6.13 E of the London Plan as they set minimum standards.	The parking standards included in Table 1 reflect the Borough's local circumstances. These standards are in line with the London Plan (paragraphs 6.42i-k) which allows Outer London Boroughs greater parking provision in new residential developments with low PTALs (0-1 and parts of 2*), assessed on a case by case basis. The policy also takes into account criteria set out by the NPPF paragraph 39, which encourages local authorities to develop their own parking standards. The Parking Standards Background paper (2016) forms the evidence base which supports the parking policy, and can be found on the consultation portal.	No modification.

Policy 31 – Relieving Congestion				
23_4	Patrick Bloom	The DLR and Tram need to run into Bromley.	The Council has proposed to safeguard land and route alignments for the DLR from Catford to Bromley South via Bromley North and the Tramlink from Beckenham Junction to Crystal Palace (draft policy 36). These are potential long term investments that have been outlined in the Council's Local Implementation Plan and the Infrastructure Delivery Schedule (appendix 10.3).	No modification.
27_2	David Clapham	There is no mention of using park and ride to relieve congestion.	Bromley Town Centre Area Action Plan Policy BTC25 Parking states that the Council will encourage park and ride operations to be developed within three indicative phases up until 2025.	No modification.
39_2	Andrew Dorrian, Transport for London (& Greater London Authority)	Policy is supported but clause c should include reference to TfL guidance.	Reference to TfL guidance will be included in draft policy 31 supporting text. New para. 4.0.8: <u>"All Transport Assessments, Travel Plans, Construction Logistics and Delivery and Servicing Plans should be developed in line with TfL guidance."</u>	Minor modification.
48_8	Samantha Powell, Education Funding Agency	Consideration should be given at an early stage of how to reduce car journeys to and from new schools. Inclusion of a Green Travel Plan can help ensure schools are better integrated within their communities.	The Road Safety team in the Council works closely with schools to address travel concerns, and promotes schemes such as Cycle Training to help reduce car journeys and parking. The provision of travel plans as a requirement to provide potential mitigation solutions is addressed in Draft Policy 28 Educational Facilities supporting text para 3.3.16 and Draft Policy 29 Education Site Allocations.	No modification.
62_1	Cherrie Mendoza, Highways England	Policy supported and suggests reference to Strategic Road Network (SRN) be included.	Strategic Road Network (SRN) is already included in Policy clause (b) whereby Transport Assessments are required to set out the impacts of their development on the SRN and propose mitigation measures.	No modification.
147_2	Patrick Holden, Babbacombe Road Residents' Association	Supports the requirement that the developers enter into an agreement to submit and implement acceptable Travel Plans, Construction Logistics Plans, and Delivery and Servicing Plans. Supports the requirement that development should improve the local highway network including traffic management measures that limit the significant impacts of development.	Support welcomed.	No modification.
Policy 34 – Highway Infrastructure Provision				
173_1	Ms Pam Notcutt, The Beckenham Society	Suggest word " <i>suitable</i> " be replaced by " <u>offered</u> " in 34d – the developer should have the choice	Amending policy wording will enable developers to offer residential roads for adoption, irrespective of	No modification.

		regarding adoption and the Council would not always have to undertake the cost of maintenance.	suitability. The existing wording ensures that only roads that are deemed suitable in line with Bromley's design guidelines are constructed.	
Policy 35 – Transport Investment Priorities				
39_3	Andrew Dorrian, Transport for London (& Greater London Authority)	DLR extension and Tramlink options do not form part of the current business plan. Requests reference to Bakerloo line extension in Policy 35. Requests inclusion of improvements to bus services and infrastructure. Clarification wanted on Overground extension.	Considerations for future phasing of the Bakerloo Line extension fall outside the life of the draft Local Plan, although aspirations have been discussed with TfL. The Council is also working closely with TfL to identify parts of the network which will benefit from improvements which will reduce bus journey times. However, no projects have been identified in the Infrastructure Delivery Schedule (appendix 10.3) to be delivered over the life of the draft Local Plan. The requested amendments to the policy are not necessary at this stage.	No modification.
80_5	Labour Group	There is no mention of proposed Bakerloo Line extension, which will have major implications for parts of Bromley.	TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this is outside the life of the draft Local Plan. However, Metroisation of services may influence any future phase.	No modification.
134_8	Chris Francis, West and Partners for Dylon 2 Ltd	The Draft Plan fails to objectively assess the potential extension of the Bakerloo Line and has failed to positively prepare, making it unsound.	TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this is outside the life of the draft Local Plan. However, Metroisation of services may influence any future phase.	No modification.
135_7	Chris Francis, West and Partners for Relta Ltd	The Draft Plan fails to objectively assess the potential extension of the Bakerloo Line and has failed to positively prepare, making it unsound.	TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this is outside the life of the draft Local Plan. However, Metroisation of services may influence any future phase.	No modification.
147_3	Patrick Holden, Babbacombe Road Residents' Association	Text high of aspiration but low on implementation, monitoring and accountability. Needs to be coupled with appropriate investment to genuinely achieve stated policy objectives. Needs clearly defined targets.	As far as is possible further details can be found in the Infrastructure Delivery Plan.	No modification.
Policy 36 – Safeguarding Land for Transport Improvements				
39_4	Andrew Dorrian, Transport for London (& Greater London Authority)	The Council should add safeguarding land for the Bakerloo Line extension. DLR and Tramlink are not funded. There are concerns over A21 projects and a strategy for delivery building on the growth study is needed. Requests inclusion of improvements to bus services and infrastructure.	Considerations for future phasing of the Bakerloo Line extension fall outside the life of the draft Local Plan, although aspirations have been discussed with TfL. The Council is also working closely with TfL to identify parts of the network which will benefit from improvements and will result in reduced bus journey times. However, no projects have been identified in the Infrastructure Delivery Schedule (appendix 10.3) to be delivered over the	No modification.

			life of the draft Local Plan. The requested amendments to the policy are not necessary at this stage. By being part of the TLRN, the Council is limited in what it can do in making any direct interventions that would improve capacity and reduce delays on the A21. The A21 Strategic Growth Study does not appear to have pushed the issue of A21 up the funding agenda at TfL and resulted in a timescale or any programme, interventions, or priorities.	
80_6	Labour Group	There is no mention of proposed Bakerloo Line extension, which will have major implications for parts of Bromley.	TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this is outside the life of the draft Local Plan. However, Metroisation of services may influence any future phase.	No modification.
115_1	John Escott, Robinson Escott Planning	Land proposed to be safeguarded in policy should be shown on a map in order to provide certainty.	Land proposed to be safeguarded has been outlined in maps which can be found in Policies Map Set 1. In regards to Keston Mark, there is no confirmed requirement for safeguarding land at this stage and a map has not been included.	No modification.
111_2	Francis Bernstein	The land in Crystal Palace Park that is being safeguarded should be made explicit and clear to allow appropriate "meanwhile" use of the area.	There is no identified requirement to safeguard land in Crystal Palace Park for Transport Improvements.	No modification.
165_3	Steve Barnes Downe Residents Association	Proposals to widen the A233 in Leaves Green [Mapset 2 (Highways)] to be for the benefit of Biggin Hill SOLDC, and not local residents is unsound due to unanswered questions regarding increased speeds and traffic (including large vehicles) affecting safety and the environment.	Once the nature of any new development at Biggin Hill Airport is fully determined the Council will then be in a position to better understand the potential traffic impact and therefore what requirements are needed to improve capacity, subject to appropriate mitigation to limit the extent of any potential traffic growth.	No modification.

1. Revised Draft Policy: Parking

The Council will normally require off-street parking spaces to be provided in new residential development in accordance with Bromley's Residential Parking Standards (per unit) as follows:

PTAL	1-2 bed	3 bed	<u>4+ bed</u>
0 – 2*	Minimum of 1	Minimum of 1.5	<u>Minimum of 2</u>
2* – 6a	0.7 (min) – 1 (max)	1 (min) 1.5 (max)	<u>1.5 (min) – 2</u> (max)

The 'Bromley Standards' are in line with the London Plan which allows outer London Boroughs greater parking provision in new residential developments in areas which have a Public Transport Accessibility Level of 0-1 and parts of 2*, subject to particular characteristics of the development and actual level of public accessibility and provision.

Locally appropriate minimum standards with two Bromley defined standards. These standards relate to 'higher' and 'lower' accessibility areas with the definition of accessibility primarily determined by PTALs. This means that the lower minimum standards would only be applicable in areas of the Borough with good public transport, and higher minimum standards applicable to the majority of the Borough that has limited public transport access. This moves away from the parking zones in the DAFP&D 2015 consultation document and takes a blanket approach to high and low accessibility minimum standards to give maximum flexibility to parking standards whilst still conforming with the London Plan.