

Bromley Proposed Submission Draft Local Plan consultation 2016

Summary of Responses June 2017

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Chapter 5 - Valued Environments

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Chapter 5 – Valued Environments				
151_3	Ann Garrett for Bromley Friends of the Earth	<p>This part of the Local Plan is unsound because :</p> <ul style="list-style-type: none"> • They would have an unacceptable impact on the town centre's local character, and • Would be in conflict with the heritage, historical value and treasured open spaces which are the town's greatest asset. 	<p>The Built Environment Chapter of the proposed Draft Submission Local Plan sets out the draft policies which seek to “<i>protect and enhance</i>”[...] “<i>the best features of the borough's natural and built environment</i>” [...] whilst “<i>carefully integrating them within the new development required to meet the needs of 21st century living</i> (Intro- paras 5.01 and 5.0.3)”.Bromley's TC AAP defines character areas in Bromley Town Centre which underpin policies and site allocations for Bromley Town Centre. These two Local Plan components will adequately address the impacts of development on the character of the town centre.</p>	No modification
152_1	John Street for Bromley Green Party	<p>The Local Plan is unsound because it would have:</p> <ul style="list-style-type: none"> • A detrimental effect and encroachment on the Bromley Town Centre Conservation Area • [...] an effect on wild life in local parks adjacent to new buildings, the water table and ecosystem • A substantial and irreversible alteration of the skyline of Bromley Town Centre - this has already been scarred by oppressive high-rise buildings at Bromley South and in Ringers Road and similar buildings which are now proposed for the Bromley North Station site, Ethelbert Close and the HG Wells Centre site • A disappointing impact in failing to enhance and preserve the fine heritage and historical qualities of the town, and the destruction of beautiful vistas and views 	As above	No modification
193_6	Katharine Fletcher, Historic England	<ul style="list-style-type: none"> • 1. Para 5.0.1: The opening phrase should reflect the terms used in national 	<ul style="list-style-type: none"> • 1. Agree change: Para 5.0.1. “<i>This Chapter sets out the draft policies which protect and</i> 	<u>Minor Modification to the introductory text to the section.</u>

		<p>guidance so that it is clearly inclusive of the historic environment, and particularly archaeology: “... <i>draft policies which protect and enhance the natural, built <u>and historic environment</u></i>”.</p> <ul style="list-style-type: none"> • 2. Para 5.0.3: reference the evidence base for the policies in this section, for ex. Show in para 5.0.3 how the Characterisation Study has influenced the plan. It would be appropriate to include a commitment to bring the townscape/heritage characterisation fwd. in final form. Evidence base for the Council policies should be consulted on. 	<p><i>enhance the natural, built <u>and historic environment</u></i>”.</p> <ul style="list-style-type: none"> • 2. Para 5.0.3. The policies in the Valued Environments Chapter are underpinned by evidence such as for example the Council’s own Local List or Historic England’s National Heritage List for England, the Council’s Conservation Area guidance and Background Papers to Areas of Special Residential Character. Characterisation has been instrumental in informing various stages in the production of the Local Plan including crucially the Core Strategy Issues Consultation which includes pen portraits outlining the distinct character of the different places in the borough, and Bromley’s Renewal Area policies. A characterisation study may form part of future Supplementary Guidance. 	No modification.
Draft Policy 37 – General Design of Development				
36_7	Colliers International	As confirmed in relation to Draft Policy 4, we agree that a high quality of design is required for all new developments. We support the proposed policy approach, as this would provide sufficient flexibility for design of development to be guided through individual circumstances rather than being dictated by strict policy requirements.	Support Noted	No modification.

43_5	Sarah Williams, Sustain	<p>Capital Growth objects to the lack of a policy which would require developers to meet the open space needs of future occupiers, especially in parts of the borough where higher density development will be appropriate. An insert should be added to part (c):</p> <p><i>“(including enhancing biodiversity <u>and making space for community gardens</u>);”</i></p>	<p>Draft Policy 4 <i>Housing Design</i>, Draft Policy 37 <i>General Design of Development</i> and Draft Policy 22 <i>Social Infrastructure in New Developments</i> combined seek to ensure that an adequate level of amenity and play space for the occupants of new built developments is secured as part of planning proposals. These policies reference where appropriate the Mayor’s <i>Shaping Neighbourhoods Play and Informal Recreation SPG</i>, which includes indicative benchmarks for the provision of play and recreation space, and to the Mayor’s <i>Housing SPG</i> which identifies minimum private open space standard and promotes the provision of new public, private and communal open space wherever possible. Local Plan policy 59 <i>Public Open Space Deficiency</i> can also be used to secure the provision of open space in areas of public open space deficiency where development opportunities arise. The detail of any open space required for the occupants of residential or other development will be negotiated at the planning application stage on a case on by case basis.</p>	No modification.
59_30	Matthew Frith, London Wildlife Trust	<ul style="list-style-type: none"> • 1. Support the reference under (c) to enhancing biodiversity. • 2. Recommend in the supporting text that reference is made to the British Standard ‘BS 42020:2013 Biodiversity. Code of practice for planning and development’ as a resource that applicants need to consider in ensuring that development design avoids or limits adverse impacts and can best contribute to securing gains for biodiversity. 	<ul style="list-style-type: none"> • 1. Noted. • 2. It is proposed to add a para. (5.0.8- and renumber the following paras) to the supporting text of Draft Policy 37 <i>General Design of Development</i>: <u>New developments and the spaces about buildings are also expected to take account of and enhance biodiversity whenever appropriate. The Council will and developers should have regards to the relevant British Standards related to biodiversity to ensure that planning proposals are informed by sufficient and appropriate ecological information.</u> • Reference to the British Biodiversity Standards can also adequately be referenced in the supporting text to Draft Policy 70, <i>Wildlife Features</i> through the addition of the following third sentence to para 5.3.4 : <u>Planning proposals should be informed by the Relevant British Standards regarding Biodiversity as</u> 	<p><u>Minor Modification to the supporting text.</u></p> <p><u>Minor Modification to the supporting text of Draft Policy 70.</u></p>

			<u>part of this process.</u>	
193_7	Katharine Fletcher, Historic England	Part j) should be changed to ensure effectiveness: <i>"... a written statement setting out design principles and illustrative material showing the relationship of the development to the <u>archaeological interest of the site, individual assets and the wider context.</u>"</i>	Section 5.1 of the Proposed Submission Draft Local Plan includes policies which seek to ensure that development does not have a negative impact on registered, designated and non-designated assets and archaeological areas. Reference to the "wider context" in clause j. of this policy is interpreted as in to include reference to the surrounding natural built and historic environment as a whole.	No modification
Section 5.1 – Built Heritage				
26_2	Michael Meekums, Orpington and District Archaeological Society	The Orpington and District Archaeological Society is content with the wording under the section of Built Heritage and the Policies map showing the Areas of Archaeological Significance.	Noted.	No modification.
151_7	Ann Garrett for Bromley Friends of the Earth	Bromley Friends of the Earth believe the Local Plan to be unsound in that it would have: <ul style="list-style-type: none"> • A detrimental effect on the Bromley Town Centre Conservation Area. • A [...] effect on wildlife in local parks, adjacent to new buildings, the water table & ecosystem. • A irreversible alteration of the skyline of Bromley Town Centre, which has already been scarred by oppressive high-rise buildings at Bromley South and in Ringers Road and which are now proposed for the Bromley North Station site, Ethelbert Close and the HG Wells Centre site. There has so far been little effort in designing buildings which adhere to the policy that developments 'should complement the scale, proportion, formal layout and materials of adjacent buildings and areas'. • A negative impact in failing to enhance/preserve the heritage/historical qualities of the town, and the destruction of beautiful vistas & views. 	Response as above (151_3 & 152_1).	No modification.
152_5	John Street for Bromley Green Party	As above	Response as above (151_3 & 152_1 and 151_7).	No modification
157_11	Senaka Weeraman	There are some very unique examples of modern architecture; will these be protected properly?	The heritage contribution of modern architecture is recognised by the Council. Indeed, there are several mid-20 th century buildings on Bromley's lists of local and statutory listed assets.	No modification.

		How will you prevent generic newer developments slowly destroying Bromley's unique character?	The Built Environment Chapter of the proposed Draft Submission Local Plan sets out the draft policies which seek to "protect and enhance"[...] "the best features of the borough's natural and built environment" [...] whilst "carefully integrating them within the new development required to meet the needs of 21 st century living (Intro- paras 5.01 and 5.0.3)". Draft Policy 37 "General Design of Development" specifically sets out the expected high standards of design and layout expected of development proposals in the borough.	No modification.
181_1	Mr Peter Martin, Bromley Civic Society	Concerned that UDP Policy BE 7 – Railings, Boundary Walls and other means of enclosure has not been brought forward into the Local Plan. This policy is important when dealing with applications in conservation areas, to prevent detrimental applications, which could be highly damaging to the character/appearance of a conservation area. This policy is a fundamental tool of the Council and APCA (Advisory Panel for Conservation Areas) to help guide property owners towards more suitable solutions, ensuring the preservation/enhancement of the character/appearance of conservation areas.	Draft Policy 41 <i>Conservation Areas</i> require development proposals in Conservation Areas to preserve and enhance the character and appearance in these areas to which railings, boundary walls and other means of enclosure often contribute. The supporting text of the policy includes reference to the detailed guidelines for each Conservation Area provided in Bromley's published Conservation Area guidance are a material consideration to the determination of planning applications. The contribution made by railings, boundary walls and other means of enclosures is identified in these statements wherever they make a significant contribution to the character or appearance of the Conservation Area. In addition, Draft Policy 37 <i>General Design of Development</i> sets out the Council's high expectations regarding the design and quality of new development.	No modification
193_8	Katharine Fletcher, Historic England	Section 5.1 should be titled " <i>Historic Environment</i> " as built heritage could be interpreted as excluding historic parks, gardens and archaeology.	Proposed change. Rename the Section "Built and <u>Historic Environment</u> " in line with the change proposed to para 5.1 as a response to HE's comment. This makes explicit the fact that the built environment encompasses the historic environment.	<u>Minor Modification to the Title of Section 5.1.</u>
Draft Policy 38 – Statutory Listed Buildings				
193_9	Katharine Fletcher, Historic England	<ul style="list-style-type: none"> 1. In line with para 126 of the NPPF, these policies (38, 42 & 45) should take an active approach to the positive management of Heritage Assets At Risk. This is a matter which is missing from these policies relating to designated assets, and should be added either to the 	<ul style="list-style-type: none"> 1. The Council is proactive in seeking to find viable uses for most of its Heritage Assets at Risk, as evidenced in <i>Historic England's own Heritage At Risk Register</i> (2016) and in line with The Local Plan's Visions and Objectives Para 1.3.14. for Bromley 's Built Environment. The policies for designated heritage assets in 	No modification.

		<p>policies individually, or in an additional policy. Historic England's 2016 Heritage at Risk Register include entries for Bromley: 21 listed buildings, 3 scheduled monuments, Crystal Palace Historic Park & Garden and Biggin Hill Conservation Area.</p> <ul style="list-style-type: none"> 2. Policy 38 is supported, but should be more closely aligned to the terminology in the NPPF. Reference to '<i>conserving the significance</i>' of listed buildings should be included. This could be done by substituting this for '<i>special interest</i>'. To aid clarity, a short explanation of 'significance' could be added to para 5.1.3. 	<p>Section 5.1 of the Proposed Draft Submission Local Plan are in line with the provisions of the National Planning Policy Framework and seek to ensure that they are conserved in a way commensurate with their significance whenever planning applications which impact them are being considered.</p> <ul style="list-style-type: none"> 2. It is not considered necessary to amend the wording of Draft Policy 38 <i>Statutory Listed Buildings</i> as the policy is in line with the intention of the NPPF. The Listed Buildings and Conservation Areas Act 1990 makes reference to the listing of "<i>buildings of special architectural or historic interest</i>", "<i>significance</i>" being a term coined at a later date. The following addition is however proposed to the supporting text (para 5.1.3) of the policy so that the reference to the special interest of listed buildings is explicitly tied to its "significance": "<i>Under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework 1990, the Council is required to have special regard to the desirability of preserving listed buildings and their settings and conserving their significance</i>", i.e the sum of its cultural, natural and heritage values". Reference to this definition of significance is taken from the Glossary of Historic England's <i>Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment</i>. 	<p>No modification.</p> <p><u>Minor Modification to the supporting text.</u></p>
Draft Policy 41 - Conservation Areas				
173_3	Ms Pam Notcutt, The Beckenham Society	The current Conservation Areas should be listed - if necessary at Annex to the Plan consistent with the listing of ASRCs in Draft Policy 44.	Agree. The Council's Conservation Areas will be listed in an Appendix to the Local Plan.	<u>Minor Modification.</u>
176_3	Ray Foster	Policy 41 is unsound in that it is inconsistent with national policy. It exceeds rather than complies with the relevant legislation, case law and the	Agree, for consistency with the wording in the Listed Buildings and Conservation Areas Act 1990 para 69.1.a. and with the wording and intent of the National	

		NPPF. It should read 'A Conservation Area is an area <u>which is designated because it has a character or and appearance which it is desirable to preserve or enhance.</u> Therefore a proposal for.....will need to preserve <u>or and</u> enhance its character characteristics or and appearance by.'	Planning Policy Framework para 127 and to contribute to clarifying the distinction between ASRCs and Conservation Areas, as requested by Historic England (see rep. 193_11), the following correction if proposed to be inserted line 1 of the Conservation Area policy <u>"Conservation Areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance".</u> Proposals for [etc....].	Minor Modification (correction).
181_9	Mr Peter Martin, Bromley Civic Society	Draft Policy 41 is important in that it enables, within the terms of the NPPF, the preservation of buildings which contribute positively to the character and appearance of a conservation area which are not otherwise classified as heritage assets in their own right. The weakness of the proposed Draft Policy is that, unlike the equivalent policy in the UDP, it fails to give any indication to Council Members, the public and developers as to any criteria upon which a judgement of positive contribution can or should be made. Recommends the re-instatement of a sentence from UDP Policy BE12 within Draft Policy 41: <u>"...in paragraph 133 of the NPPF. In assessing positive contribution reference will be made to "Conservation Area designation, Appraisal and Management - Historic England Advice Note1.para 61". Where the building proposed..."</u>	Draft policy 41 includes clauses which seek to ensure that a positive contribution from new development will be made to the character and appearance of conservation areas. The following sentence however will be added after line 6 in the supporting text to the policy to assist with the application of the policy <u>"In assessing the contribution made by a particular building to a conservation area, reference will be made to the current relevant Historic England guidance".</u>	Minor modification to the supporting text.
193_10	Katharine Fletcher, Historic England	1. In line with para 126 of the NPPF, these policies (38, 41 & 45) should take an active approach to the positive management of Heritage Assets At Risk. This is a matter which is missing from these policies relating to designated assets, and should be added either to the policies individually, or in an additional policy. On Historic England's 2016 Heritage at Risk Register entries for Bromley include: 21 listed buildings, 3 scheduled monuments, Crystal Palace Historic Park & Garden and Biggin Hill Conservation Area. 2. In order to align this with the terms of the NPPF, it is recommended that reference is	<ul style="list-style-type: none"> • 1. See response to 193_9 as above • 2. It is not considered necessary to amend the wording of Draft Conservation Area Policy 41 	No modification. No modification.

		<p>included to conserving <i>'the significance'</i> of conservation areas.</p> <p>3. Also, the evidence base provided by Conservation Area Appraisals and Management Plans should be referred to in the policy, particularly as reference is made to buildings that make a positive contribution. This could be expanded upon in the supporting text, explaining where these are available and any rolling programme for preparation. The policy could reflect these aspects if re-worded as follows:</p> <p><u><i>"The character or appearance of conservation areas will be conserved and enhanced. Development proposals should avoid harm to the historic significance of conservation areas, ensuring their character and appearance is conserved, and provide for enhancement where opportunities arise. The Council will ensure that developments:</i></u></p> <ul style="list-style-type: none"> - <i>Respect or complement the layout, scale, and form of existing buildings and spaces</i> - <i>Respect and incorporate in the design existing landscape, townscape or other features that</i> 	<p>to the extent proposed by Historic England as it is in line with the intention of the NPPF. However as per the response to representation 176_3 as above, a minor correction is proposed to the description of Conservation Areas in line 1 of the policy to reflect the definition used in the <i>Listed Buildings and Conservation Areas Act 1990</i>. This will contribute to clarifying the distinction between ASRCs and Conservation Areas, as requested by Historic England.</p> <ul style="list-style-type: none"> • The following addition is however proposed to the supporting text (para 5.1.6) of the policy so that the reference to the special interest of listed buildings is explicitly tied to its "significance". <u><i>"Detailed Guidelines for each Conservation Area and a description of the significance which it is desirable to conserve are contained in Conservation Area Guidance [...]."</i></u> • 3. It is considered that the Council's Conservation Area guidance documents are adequately referenced in the supporting text of the policy (para 5.1.6 line 5). 	<p><u>Minor modification to the supporting text.</u></p> <p>No modification.</p>
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		<p><i>contribute to the character, appearance or historic value of the area;</i></p> <p><i>- <u>Take opportunities for enhancement, including securing the future of heritage assets at risk;</u></i></p> <p><i>- <u>Use high quality materials appropriate to the context;</u></i></p> <p><i><u>In assessing applications the Council will have regard to information in conservation area appraisals and management plans, and other relevant information regarding the significance of the area, and the heritage assets within it. A proposal for a development...."</u></i></p>		
Draft Policy 43 - Trees in Conservation Areas				
59_31	Matthew Frith, London Wildlife Trust	<p>Supports this policy.</p> <p>Recommend that potential impacts on biodiversity (as well as legal considerations in terms of protected species) should be considered in any application and decision re: trees in CAs.</p>	<p>Development affecting trees in CAs are also subject to Draft Policy 73 "<i>Development and Trees</i>" which requires proposals for new development to take particular account of trees with wildlife value. The role of TPOs in flagging up these trees of environmental importance is referred to in this policy. The importance of trees for habitats forms part of scoring trees in deciding whether to protect them through TPOs. Species and habitats of importance in Bromley are identified in <i>Bromley's Biodiversity Plan</i>. The impact of development on wildlife features and protected species are also sought to be mitigated through Draft Policies 70 and 72.</p>	No modification.
71_10	Tony Allen, The Chislehurst Society	<p>Concerned that there is no specific provision for safeguarding trees in conservation areas. This policy only applies where development takes place. In non-development situations, the only protection against uncontrolled felling is under the s211 Notice procedure (Town and Country Planning Act 1990), which allows for the making of a Tree Preservation Order.</p> <p>The Society is particularly concerned that the majority of s211 Notices submitted to fell or treat trees in conservation areas are allowed to proceed, even when there is little or no rationale for the proposed action. In the absence of a specific policy, action is less likely to be prioritized. LBB should review this as a matter of urgency.</p>	<p>Noted. The special contribution of certain trees to the character and appearance of Conservation Areas is recognised by Draft Policy 43. Para 5.3.2 in the supporting text of Draft Policy 73 also explains that existing additional level of protection afforded to trees in CAs where they are over 7.5 cm in diameter and over 7.5 cm high. For consistency, it is proposed to move this supporting text to para. 5.1.8 , line3 of Draft Policy 43 <i>Trees in Conservation Areas</i> and make reference to where this additional level of protection originates as follows: "<i>threatened [...] Trees over 7.5 cm in diameter measured at 1.5m from ground level in Conservation Areas are protected under the Town and Country Planning Act 1990</i>"<i>even where they are not covered by TPOs</i>. It is further proposed to make reference to the <i>Trees in Conservation Areas Policy</i> in the supporting text of the policy, as follow (end of para</p>	<u>Minor Modification to the supporting text</u>

		Note that Draft Policies 73 and 74 are also relevant, but do not provide the protection required within conservation areas.	<p>5.3.2): Policy 43 sets out how the Council will assess applications for the felling of trees in Conservation Areas. Please refer to Page 17 to view how these two policies are proposed to be amended.</p> <p>Where Section 211 notices are required to allow the felling of a protected tree in a CA to proceed, the Council's Tree officer assesses whether they are TPO worthy. Where this cannot be justified, tree works cannot be objected to.</p>	<u>Minor Modification to the supporting text</u>
Appendix 10.6 – Areas of Special Residential Character				
69_64	Matthew Frith, London Wildlife Trust	Statement of Significance for Chelsfield Park, Chelsfield and Pratts Bottom. Recommend that this should refer to the SINC containing species-rich grasslands in addition to the "areas of greenbelt which include woods."	Amend ASRC description for Chelsfield Park line 13 to "The estate also comprises areas of greenbelt which include woods and agricultural grazing land. These are partly designated as a Grade I Site of Interest for Nature Conservation which includes species rich grassland".	<u>Minor modification to the area description.</u>
Draft Policy 44 – Areas of Special Residential Character				
193_11	Historic England	<ul style="list-style-type: none"> 1. In the interests of clarity as to the status of this designation we recommend that the text refers to how you have defined these. The role of the Borough's Characterisation study in defining ASRCs should be explained. 	<ul style="list-style-type: none"> 1. The <i>Local Plan Background Paper on Potential Areas of Special Residential Character</i> (2015) sets out the background and the methodology applied to identifying Areas of Special Residential Character additional to those the historic ASRCs identified in the UDP. It includes the assessment of new proposed ASRCs against the criteria for designation. The 2016 <i>Local Plan Background Paper "North Copers Cope Road and the Knoll ASRCs Spatial Character Assessments"</i> includes the assessments of two other areas proposed for designation as ASRCs in the Draft Local Plan. It is proposed that these two evidence base documents are made reference to in the supporting text to the policy as follows: <p>Suggested Addition to para 5.1.10 <i>The Appendix includes guidelines for the management of development in ASRCs. ASRCs are shown in the policies map. Background to the designation of ASRCs is set out in the "Local Plan Background Paper on Potential Areas of Special Residential Character (2015)", whilst additional assessments are set out in the 2016 Local</i></p> 	<u>Minor modification to the supporting text</u>

		<ul style="list-style-type: none"> 2. Explanation of how these relate to conservation areas is also needed. Appendix 10, section 10.6 relating to ASRCs provides useful information but relates only to some areas and again an explanation of the evidence base would assist with clarity. 3. Reference is needed in Appendix 10.6; section 3 (p312) Guidelines for ASRCs, to protection of heritage assets. 	<p><u>Plan Background Paper “North Copers Cope Road and the Knoll ASRCs Spatial Character Assessments”.</u></p> <ul style="list-style-type: none"> 2. Further wording will be included in the Conservation Area policy to clarify how CAs are identified. See proposed response to reps 176_3 (Ray Foster) and 193_10 (Katherine Fletcher). 3. It is not considered that it is necessary to make reference to the protection of heritage assets in the Guidelines for ASRCs as these assets are already protected depending on their degree of significance through the various relevant emerging Local Plan policies. 	No modification.
Draft Policy 45 – Historic Parks and Gardens				
59_32	Matthew Frith, London Wildlife Trust.	Supports this policy.	Support Noted.	No modifications.
119_3	Ken Lewington, The Crystal Palace Foundation	At para 5.1.12, it is said that Historic England compiles a <i>Register of Parks and Gardens of Special Historical Interest in England (National Heritage Act 1983)</i> , when it should actually state <i>Register of Parks and Gardens of Special <u>Historic Interest</u></i> .	Agree. Reword reference to the “ <i>Register of Parks and Gardens of Special Historical Interest in England</i> ” to the “ <i>Register of Parks and Gardens of Special <u>Historic Interest</u></i> ” instead.	<u>Minor modification to the supporting text.</u>
189_1	Sally Collins	Concerns over the soundness, in that the wording to protect heritage assets of national importance is weak compared to that describing the protection ascribed to Archaeological sites (e.g. The Crystal Palace Dinosaurs and Down House). The fact that the council will only 'seek' to ensure that the park or garden is appropriately managed or maintained in a manner which reflects its status and designation, is not comparable with the much stronger statement that planning permission ' <i>will not be granted</i> ' for development that would adversely affect Scheduled Ancient Monuments or other Nationally Important Archaeological Sites. The contrast does not instil confidence that Bromley will do its best to protect these significant heritage assets on behalf of the nation.	Line 1 of Draft Policy 45 sets out t the strong “expectations” of the Council regarding the protection of Registered Historic Parks or Gardens and is consistent with the approach on the conservation of listed heritage assets in the NPPF. Paras 132-134. For clarity however, and consistency with other policies on registered Heritage Assets in the Valued Environments Chapter of the Draft Submission Local Plan , reference to the relevant tests in the NPPF against which any proposal would be assessed is proposed to be added to the supporting text to the policy, para 5.1.14 at the end of line 4 : [...] <u><i>the Council will consult Historic England. Proposals impacting the significance of a Registered Park or Garden will also be assessed against the tests laid out</i></u>	<u>Minor Modification to the supporting text.</u>

			in para. 132-134 of the National Planning Policy Framework so that the park's significance is appropriately conserved.	
190_3	Dr Ellinor Michel	Section 5.1.13 lists " <i>Grade II*: Crystal Palace Park</i> " but this should also include mention that a region within this park is Grade I listed, the Crystal Palace Dinosaurs & Geologic Illustrations.	Crystal Palace Park as a whole is Grade II* Listed as a registered park under the Historic Buildings and Ancient Monuments Act 1953 in Historic England's Register of Parks and Gardens of Special Historic Interest". The parks' special interest is described in its entry and mentions the Dinosaurs and Geologic Illustrations, which are Grade I Listed as a separate entry under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for their special architectural or historic interest.	No modification.
193_12	Katharine Fletcher, Historic England	<ul style="list-style-type: none"> 1. In line with para 126 of the NPPF, these policies (38, 42 & 45) should take an active approach to the positive management of Heritage Assets At Risk. This is a matter which is missing from these policies relating to designated assets, and should be added either to the policies individually, or in an additional policy. On Historic England's 2016 Heritage at Risk Register, it has entries for Bromley which include: 21 listed buildings, 3 scheduled monuments, Crystal Palace Historic Park & Garden and Biggin Hill Conservation Area. 2. Recommend the following change to bring the policy in line with national policy: <i><u>'Applications within or adjoining a Historic Parks or Garden will be expected to conserve its significance, including its special features, historic interest and setting. The Council will seek to ensure...'</u></i> 	<ul style="list-style-type: none"> 1. See response as above (193_9) 2. It is not considered necessary to amend Draft Policy 45 Historic Parks and Gardens as it is in line with the intention of the NPPF and sets out the strong expectations of the Council regarding the protection/conservation of Registered Historic Parks or Gardens. For clarity however, and consistency with other policies regarding registered assets in the Valued Environments Chapter of the Draft Submission Local Plan, reference to the relevant tests in the NPPF against which any proposal would be assessed is proposed to be added to the supporting text to the policy, para 5.1.14 at the end of line 4, as per the wording proposed 	<p>No modification.</p> <p>No modification.</p>

		<ul style="list-style-type: none"> 3. Concerned that the significance of the borough's nationally designated Historic Parks and Gardens may be less clear in the plan than some of the locally recognised open spaces. While the section on local green spaces in Appendix 10 is welcomed, this does not include details of the significance of the five, nationally designated Historic Parks and Gardens in the borough. For clarity, and balance, it is recommended that the entries from the national Register are included in the plan, or that there is information in para 5.1.14 as to where these entries can be accessed. 4. Requested that the Historic Parks and Gardens on the national register are shown on the Policies Map to ensure the effectiveness of this plan policy. 	<p>as a response to rep. 189_1 as above.</p> <ul style="list-style-type: none"> 3. Contrarily to Local Green Space, introduced through the National Planning Policy framework, Historic Parks and Gardens are not identified through the planning process but under the <i>National Heritage Act 1983</i>. Their significance is described in Historic England's Register of Historic Parks and Gardens included in the web-based National Heritage List. It is not considered that it is necessary to replicate this information in Bromley's Local Plan however it is proposed to signpost end of para 5.1.14. where these statements may be consulted to assist with the application of the policy, following the previous addition proposed as above as part of the response to 189_1 : <u>"The Significance of each Registered Parks or Garden is set out and described as part of their respective entries on Historic England's web-based National Heritage List"</u> 4. Agree, the sites will be identified on the Policies Maps as they are referred to in the policy. The policy would apply to them whether or not they are shown on the map as they are designated outside the Local Plan process. 	<p><u>No modification. Modification to the policies map.</u></p>
Appendix 10.7 - Areas of Archaeological Significance				
26_4	Michael Meekums, Orpington and District Archaeological Society	The Orpington and District Archaeological Society is content with this list.	Support Noted.	No modification.
Draft Policy 46 - Ancient Monuments and Archaeology				
71_13	Tony Allen, The Chislehurst Society	Support the sentiments behind this policy, but are concerned that LBB is not able to support the required investment. Scadbury Park's moated manor is a particular case in point. This site has been assessed as 'At Risk' by Historic England, and yet actions to remedy the situation do not appear to be forthcoming.	Noted. The London Borough of Bromley, idverde, Historic England and the Orpington and District Archaeological Society are currently in advanced talks to formalise a plan of action for the Scadbury's Park Moated Manor. Historic England recently put forward a grant and LBB also supplied funding to undertake a condition survey of the site in August 2016. This has outlined the extensive works that would need to be done to preserve it and move it off the At Risk register. The Council is currently exploring the potential of a further grant from HE and also HLF funding.	No modification.

81_1	Lesley Hewett	<p>The consultee is surprised to see that there has been an amendment to the extent of the archaeology area just surrounding Keston court stables.</p> <p>During recent work on the site in connection with a planning permission no archaeological remains were found and there is no reason to suggest that anything further would lay in the remaining part of the garden or in the stables at the end of the property. Asks that in view of this the plan is reinstated to the current designated area as there is no logical reason why there should be an indentation to include this property when the land on either side is not included.</p>	<p>Areas of Archaeological Significance (AASs) are identified by Historic England and no changes are proposed to the boundary which does not include this site. The AASs do not reflect the location of known archaeological assets.</p>	No modification.
193_13	Katharine Fletcher, Historic England	<ul style="list-style-type: none"> • 1. Amend the title to '<i>Scheduled monuments and Archaeology</i>' for clarity. Scheduled monuments are protected by statutory designation; ancient monuments may or may not be designated. • 2. The supporting text in paragraph 5.1.16 could be modified to state that the designation of Areas of Archaeological Significance is to be revised to Archaeological Priority Areas and that this will be captured by Supplementary Planning Guidance. • 3. Add at the end of paragraph 5.1.16: '<i>Further advice can be provided by the Greater London Archaeological Advisory Service (GLAAS) within Historic England.</i>' • 4. Paragraph 5.1.15, page 126, this paragraph mixes scheduled monuments and non-designated archaeology, for which different approaches are needed, 	<ul style="list-style-type: none"> • 1. Agreed. Change the title of the policy to '<u>Scheduled Monuments and Archaeology</u>' for clarity. • 2/3. Agree: It is proposed to include the following sentence at the end of para 5.1.16 : <u>"Bromley's Areas of Archaeological Significance are due to be reviewed by Historic England and Supplementary Planning Guidance will be published identifying any proposed changes". 'Further advice can be provided by the Greater London Archaeological Advisory Service (GLAAS) within Historic England.'</u> • 4. Noted. Paras 3 and 4 of the policy set out distinct approaches to how the Council will consider the architectural value of Areas of Archaeological Significance and that of sites of 	<p><u>Minor Modification to the Policy Title.</u></p> <p><u>Minor Modification to the supporting text.</u></p>

		<p>proportionate to their significance. We would be pleased to offer some alternative text here for your agreement.</p>	<p>potential archaeological significance. Para 5.1.15 is purely descriptive and has no implications for the use of the policy.</p> <ul style="list-style-type: none"> 5. The following entry is being proposed for Areas of Archaeological Significance (AAS) in a separate entry in the Glossary. <u>Areas of Archaeological Significance (AAss):</u> <u>These demarcate areas with the potential to have architectural interest. Their primary purpose is to help highlight at an early stage where a development proposal may affect heritage assets of archaeological interest and so trigger early consultation with the borough's archaeological adviser on the need for site specific assessment and field evaluation.</u> 	<p>No modification to the policy. <u>New Entry in the Glossary.</u></p>
Draft Policy 47 – Tall and large buildings				
125_5	Jennifer Peters, Greater London Authority	<p>This paragraph defines high buildings as those that “<i>exceed the general height of their surroundings and cause a significant change to the skyline</i>”. This is a different approach to the London Plan, which has defined tall buildings (with reference to CABE and English Heritage Guidance) as those that are “<i>substantially taller than their surroundings and cause a significant change to the skyline</i>”.</p> <p>The difference between high vs tall is not made clear, indeed within the draft Local Plan, the two terms appear to be used inter-changeably. The language should be made consistent and to avoid confusion, should use tall, as per the London Plan.</p> <p>Of more concern is the difference between “<i>exceeding the general height</i>” vs “<i>substantially taller</i>”. The draft Local Plan definition brings many more potential developments within a high/tall buildings definition. This in turn is likely to act as a brake on what otherwise may be perfectly acceptable intensification of uses. For example, modest increases in height of buildings in</p>	<p><u>Historic England’s Advice Note 4: Tall Buildings</u> updates and supersedes 2007 Guidance by English Heritage and CABE. The definition used in the 2007 for Tall Buildings being those which “<i>exceed the general height of their surroundings</i>” , referenced in the supporting text of London Plan policy 7.8 is no longer the definition referred to in this new guidance. The definition used in Draft Policy 47 <i>Tall and Large Buildings</i> is consistent with the new guidance which promotes a plan led approach to the identification of locations suitable for tall buildings and recognises that this will depend on the nature and on the character of the area.</p> <p>It is however acknowledged that the term “<i>high</i>” isn’t the term used in either in HE guidance or in Policy 7.8 of the London Plan.</p> <p>For consistency, it is therefore proposed to amend the wording line 1 of para 5.1.20 to “<i>High Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline</i>”.</p>	<p><u>Minor Modification</u></p>

		generally 2 storey suburban areas to 4-6 storey buildings may be suitable in a number of locations. The plan should provide a more supportive policy approach for such development.		
176_2	Ray Foster	The wording of policy 47 is unsound because it effectively attempts to promote Historic England's Guidance to development plan policy status. It can only be a material consideration meriting mention in the supporting text.	Bromley's policy incorporates Historic England's guidance to assessing the suitability of proposals for tall buildings.	No modification.
61_12	Kieran Wheeler, Savills for Bellway Homes	<p>Consider the use of tall and large buildings as an appropriate way of efficiently optimising the use of land, in particular maximising the delivery of new homes and residential floorspace as part of mixed use development. This has not been acknowledged by LBB in their draft policy.</p> <p>We agree that such buildings should make a positive contribution to the townscape and that the proposed design should enhance the character of the surrounding area. The draft policy should acknowledge the contribution that new tall or large buildings can add to the townscape, including the balance of harm versus public benefit.</p>	<p>This policy is in line with 2016 London Plan policy 7.7 <i>Location and Design of Tall Buildings</i>. Bromley's Town Centre's Area Action Plan in diagramme 4.3 and the Draft Local Plan both identify potential sites for tall buildings in Bromley's Town Centre (including for the delivery of residential units).</p> <p>Proposals for Tall Buildings in suitable locations will be assessed against the criteria set out in the 2016 London Plan's policy 7.7 and against the Historic England Guidance referenced in Bromley's Local Plan policy. In advising on how to make planning decisions and assess applications, both seek to balance harm versus public benefit.</p>	No modification
Draft Policy 48 - Skyline				
23_3	Patrick Bloom	Developments needs to be mindful of current sky line - nothing to be built should be too high and impede current views.	Noted. Draft Policy 47 <i>Tall and Large Buildings</i> defines acceptable parameters to the development of Tall Buildings. In addition, the Draft Policy 48 <i>Skyline</i> aims to ensure that development which may impact on the skyline protects and enhance the quality of the views, vistas, gaps and skyline of note in the borough.	No modification
27_3	David Clapham	There appears to be an omission from 5.1.22 Views of Local Importance; the view from the Holwood Oak over the Vale of Keston is referred to historically as important as it was where William Wilberforce discussed with William Pitt the abolition of slavery. This view should be included within the Local Plan.	This is not an appropriate stage in the production of the Local Plan to consider suggestions for new views.	No modification
61_6	Kieran Wheeler, Savills for Bellway Homes	Consider the requirements of this policy important, but feel that greater clarity as to how impacts should be demonstrated need to be provided. The policy should clarify that impact should be	Suggested addition to para 5.1.21 to clarify the mechanisms through which the impact of buildings on views may be demonstrated: " <i>Views will need to be considered to ensure intrusive elements are not</i>	<u>Minor modification to the supporting text.</u>

		demonstrated in a Design and Access Statement and/or Townscape Visual Impact Assessment.	<i>introduced whether in the foreground, middle ground or background through the appropriate assessment.</i>	
104_1	Mr & Mrs J H Milton	Strongly recommend that another view should be included in this list. It is the view one has across the dry valley (which Shire Lane runs through) northwards from Bogey Lane across to the chalk ridge which runs gently from St Giles Church in Farnborough Village roughly westward to Holwood House. This is a tranquil gem, not only in LBB but also in the whole of South East England. The ridge is gently undulating, often topped by trees and dappled by copses in the open fields. It has a sense of perfect peace. There is no better view of its type. Also, to preserve this precious tranquillity, Shire Lane should not widened.	This is not an appropriate stage in the production of the Local Plan to consider suggestions for new views.	No modification

Proposed Amendments to Draft Policy 73 Development and Trees and Draft Policy 43 Trees in Conservation Area

Draft Policy 43: Trees in Conservation Areas

Development will not be permitted if it will damage or lead to the loss of one or more significant and/ or important trees in a Conservation Area, unless:

- a) Removal of the tree/s is necessary in the interest of good arboriculture practice, or
- b) The benefit of the development outweighs the amenity value of the tree/s.

In granting permission for the development, one or more appropriate replacement trees of a native species will be sought on site through the use of conditions or planning obligations.

Supporting Text

5.1.8 The Council recognises that trees often make an important and valuable contribution to the conservation area and will resist proposals where their health or visual amenity is threatened. When consent is given for a tree to be felled, an appropriate replacement will usually be required as a condition of that consent. ~~In addition, trees over~~

~~7.5cm in diameter measured at 1.5m from ground level in Conservation Areas are protected. Native species and local provenance will be sought as appropriate".~~ Trees over 7.5 cm in diameter measured at 1.5m from ground level in Conservation Areas are protected under the Town and Country Planning Act 1990" even where they are not covered by TPOs.

Draft Policy 73: Development and Trees

Proposals for new development will be required to take particular account of existing trees on the site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained. Tree preservation orders will be used to protect trees of environmental importance and visual amenity. When trees have to be felled, the Council will seek suitable replanting of native species.

Supporting Text

5.3.2 Trees are important features of the Borough's environment and are a valuable resource for wildlife. The Council places a high priority on their retention and protection. They can be protected by the making of a Tree Preservation Order (TPO) which can relate to individual trees, groups of trees or areas of woodland. Trees will be assessed against criteria that take into account public visibility, retention span, condition and the risk of loss. Numerous trees and woodlands throughout the Borough are protected by TPOs. ~~In addition. Trees over 7.5 cm in diameter measured at 1.5m from ground level in Conservation Areas are protected even if they are not protected by a TPO. Policy 43 sets out how the Council will assess applications for the felling of trees in Conservation Areas.~~

5.3.3 When considering development proposals the Council will seek the retention value healthy trees of amenity. Where trees are retained within new development sites, they can help to create a settled appearance to the landscape while newly planted trees will take a number of years to reach maturity. Where new trees are planted native species and local provenance will be sought as appropriate.

5.3.4 When development proposals threaten to impact negatively important/significant trees, the Council will require the submission of a tree survey, and arboriculture implications assessment in accordance with British Standard BS5837:2012 – trees in relation to construction

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

Section 5.2 - Open and Natural Space

DLP no.	Representor	Summary of response	Officer comment	Recommendation
50_2	David Phillips, Strutt & Parker, Iris Estates Ltd	Related to rejected housing site Land north of Warren Road. Evidence not robust. Not undertaken GB review.	<p>Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan. In particular in these circumstances there is no requirement in the NPPF for LAs with Green Belt carry out a full review of land so designated.</p> <p>Other than the changes to GB, MOL and UOS sites set out in the supporting documents to the Local Plan Draft Policies and Designations document, the council feel that they can meet their housing requirements without removing land from open space designation.</p> <p>An opportunity was presented when the 'Call for sites' exercise was undertaken as part of the Local Plan Draft Policies and Designations Consultation in 2014. This asked whether there were appropriate sites within the Borough that might be suitable for future development or a change of use in line with its Vision and Objectives. Numerous sites came forward, including the site referred to in the representation. These were assessed and those assessments were published, as a supporting document, with the Draft Allocations, Further Policies and Designations consultation. This site was one of those rejected.</p>	No modification
79_3	John Escott, Robinson Escott Planning on behalf of Crystal Palace Football Club Ltd.,	The plan does not have a proportionate evidence base for open and natural space and is not sound.	Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan.	No modification

<p>87_3</p>	<p>John Escott, Robinson Escott Planning on behalf of Mr P Antill</p>	<p>No robust, up to date assessment of the needs for open space - unsound basis for policies 49,50 and 55</p>	<p>Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan. In particular in these circumstances there is no requirement in the NPPF for local authorities to undertake a review of land which has an open space designation, in the case of Bromley GB, MOL and UOS.</p> <p>Other than the changes to GB, MOL and UOS sites set out in the supporting documents to the Local Plan Draft Policies and Designations document, the council feel that they can all the development requirements without removing any further land from open space designation.</p> <p>It is acknowledged that it requires assessments of the needs for open space, sports and recreation facilities that an assessment of needs for open space, sports and recreation facilities is undertaken in support of Local Plan policies, and that such an assessment is not currently available for Bromley. However, even if there were surpluses of open space, it would not necessarily negate the need to retain an open space designation.</p> <p>Planning Policy Statement 8 (Open Space, Sport and Outdoor Recreation), Annex A, Open Space, A3 states:</p> <p>'The Department recognises that most areas of open space can perform multiple functions. These will be taken account of when applying the policies of this Statement. These include:</p> <p>4. havens and habitats for flora and fauna – sites may also have potential to be corridors or stepping stones from one habitat to another and may contribute towards achieving objectives set</p>	<p>No modification</p>
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			<p>out in the Northern Ireland Biodiversity Strategy;</p> <p>.....</p> <p>6. as a visual amenity – even without public access, people enjoy having open space near to them to provide an outlook, variety in the urban scene, or as a positive element in the landscape.’</p> <p>Bromley has a number of open space sites which are either not in active use or not accessible to the public, it is considered that these would fall under PPS8, A3 4 and 6 above and consequently still be of value as open spaces.</p>	
89_3	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	No robust, up to date assessment of the needs for open space - unsound basis for policies 49,50 and 55	See Officer Comment on DPL87_3 above.	No modification
91_3	John Escott, Robinson Escott Planning on behalf of Joseph Samuel Corporation	No robust, up to date assessment of the needs for open space - unsound basis for policies 49,50 and 55	See Officer Comment on DPL87_3 above.	No modification
92_3	John Escott, Robinson Escott Planning on behalf of Langford Walker Ltd	No robust, up to date assessment of the needs for open space - unsound basis for policies 49,50 and 55	See Officer Comment on DPL87_3 above.	No modification
Draft Policy 49 - The Green Belt				
16_1	Paul Marshall, Aperfield Green Belt Action Group	Would support the protection of the Green Belt they expect, not just a strong defence by Bromley of the Green Belt, but a similar approach to infilling in the Green Belt.	Support welcomed	Note the support
59_33	Matthew Frith, London Wildlife Trust	Support in principle this policy, but retain objections to a number of the proposed changes to Green Belt sites (see comments under various specific numbered sites and Policies Map Set 2).	Support welcomed, see comments on site specific matters under ‘Policy Map Sets’	Note the support
69_3	Nick Ireland, GL Hearn for Milton MVi	<p>The Council reviewed the Green Belt, Metropolitan Open Land and Urban Open Space as part of the plan development. However this was undertaken in 2012, and pre-dated the 2014 SHMA which provided an assessment of the Borough’s objectively assessed housing need (OAN).</p> <p>A new Green Belt Review should be undertaken, taking account of the unmet need for housing and office floorspace in the Borough. This should</p>	Under the London Plan Policy 1:1, growth as set out in the London Plan’s detailed policies is to take place without encroaching on the Green Belt or London’s protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan. In particular in these circumstances There is no requirement in the NPPF for LAs with Green Belt carry out a full review of land so designated.	No modification

		include consideration of the potential for delivery of a sustainable Garden Village south-east of Orpington such as Hewitt's Farm.	The development needs in the borough can be met within the built up area and there is no need to release any open space, other than that identified in the Draft Plan.	
97_3	John Escott, Robinson Escott Planning on behalf of Bromley Football Club	The Bromley Football Club Stadium comprises a very substantial area of previously developed land within the Green Belt. The NPPF and Draft Policy 49 regard the redevelopment of previously developed land as appropriate development in the Green Belt provided that it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. In principle, housing development enabling the relocation of the Football Club to a new stadium within the Norman Park sports hub would be appropriate. In such circumstances, it would seem sensible for there to be an adjustment to the Green Belt boundary to remove the stadium and its car park from the Green Belt and for the site to be allocated as a future housing site.	<p>Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan.</p> <p>The relocation of a stadium, to a nearby site which is not developed would be contrary to the NPPF and Draft Policy 49 as the new development would clearly constitute 'inappropriate development' in the Green Belt.</p> <p>The removal of the site from the Green Belt would result in an isolated 'hole' which would lead to pressure from the owners of the adjoining land between this site and the residential areas which mark the current Green Belt boundary, for there sites to be developed as 'infilling'.</p> <p>The Glossary of the NPPF defines 'Previously Developed Land' as:</p> <p>"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure."</p> <p>Setting aside the principle of what is being suggested, it is clearly the intention of the consultee to include the area of the playing surfaces in calculation of developable area. This would not be considered appropriate as the council do not regard that playing area or</p>	No modification

			the artificial training pitches as 'previously developed'.	
143_4	Bob Neill MP	In relation to housing in particular, preference should always be given to previously developed sites, albeit with different previous uses, and building upon open land avoided if at all possible, reflecting the hierarchy of open land protection.	Support welcomed.	Note the support
168_13	Dr. Elanor Warwick Clarion Housing Group	Welcome that the Council is considering reviewing, identifying and releasing appropriate low quality Green Belt sites for residential development in order to meet the current London Plan housing target, but are concerned that these sites are considered carefully, and proposed developments do not undermine the existing spacious green character of the Borough.	<p>Welcome the support for the Policy, but would point out that with the exception of the Traveller Sites, no land is being removed from the Green Belt for residential development in the draft plan.</p> <p>Some sites or parts of sites which are already developed are proposed for removal (Policies Map Set 2), however these changes are not releases of undeveloped land for housing, in most cases it is a recognition the land has been developed and no longer fulfils the purposes of being in the Green Belt (a prime example being the former Blue Circle sports Ground fronting Bromley Common)</p>	Note the support
176_4	Ray Foster	<p>National policy specifies that changes to the Green Belt can only take place where exceptional circumstances are specified.</p> <p>The plan fails to meet this requirement. It contains some rather general explanations why certain sites are to be excluded, e.g. to make way for new schools, or for school expansions, or to meet economic needs at Biggin Hill. It is not always clear that these are the only sites where the stated aims can be achieved.</p> <p>The justifications can seem little more than a convenient way to tackle urgent needs. Some expansion of the text may be need to demonstrate clear compliance with national policy and therefore soundness.</p>	<p>The NPPF states in para 83:</p> <p>'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'</p> <p>Concerns regarding the Green Belt boundary changes proposed to accommodate specific uses have been raised by others and are commented on in relevant section of this report.</p> <p>The explanations for the changes set out in Policies Map Set 2 were given in an earlier consultation (Local Plan Draft Policies and Designations February/March 2014). These changes are considered to ensure that sites which no longer fulfil any of the purposes of the</p>	No modification

			Green Belt cannot be used as exemplars for releasing undeveloped GB land in the future. (e.g. the former Blue Circle sports Ground fronting Bromley Common)	
Draft Policy 50 - Metropolitan Open Land				
59_34	Matthew Frith, London Wildlife Trust	Support in principle this policy, but retain objections to a number of the proposed changes to Green Belt sites (see comments under various specific numbered sites and Policies Map Set 2).	Support welcomed, see comments on site specific matters under 'Policy Map Sets'	Note the support
134_7	Chris Francis, West and Partners for Dylon 2 Ltd	Fails to embrace review of boundaries in compliance with Policy 7.17 of the London Plan. The Plan is not sound.	<p>Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open space and residential development has been defined by the London plan. In particular in these circumstances there is no requirement in the NPPF for LAs with Green Belt carry out a full review of land so designated.</p> <p>There is no requirement in either the NPPF or the London Plan to undertake a full review GB and MOL boundaries, they set out the criteria which should be used when designating such land.</p> <p>The basis on which the reviews of GB, MOL and UOS boundaries undertaken in 2014 as part of the Local Plan Process (<i>Draft Policies and Designations consultation</i>), is set out at the front of each of the supplementary documents associated with this consultation, including the criteria which were used.</p> <p>The council consider that they can meet their housing requirements without having to release any open land sites for that purpose.</p>	No modification
135_8	Chris Francis, West and Partners for Relta Ltd	Fails to embrace review of boundaries in compliance with Policy 7.17 of the London Plan. The Plan is not sound.	See comment above.	No modification
149_2	Neeraj Dixit, CBRE for Mike Corby Management	<p>The adopted London Plan Policy 7.17 states that the policy guidance of paragraphs 79-92 of the NPPF on Green Belts equally applies to MOL.</p> <p>Draft Local Plan Policy 49 addresses the Green</p>	Under the London Plan Policy 1:1, growth as set out in the London Plan's detailed policies is to take place without encroaching on the Green Belt or London's protected open spaces. In effect the balance between Green Belt, open	No modification

		<p>Belt. This states that within the Green Belt, permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm.</p> <p>Draft Policy 50 relates to MOL. This states that Metropolitan Open Land (MOL) will be given the same level of protection as Green Belt. The exceptions to inappropriate development are consistent with Green Belt policy and permission will not be given for inappropriate development except in very special circumstances. It is disappointing to see draft Policy 50 proposed to be introduced into the Local Plan. This is because not all MOL has the same characteristics as Green Belt. Also, by seeking to give the same level of protection to MOL as Green Belt, this removes reasonable flexibility to take account of particular characteristics or recent planning history of an MOL site.</p> <p>Paragraph 80 of the NPPF sets out the five purposes that Green Belt serves and we consider it important to assess our client's site against the Green Belt functions (i.e. the purpose of including land within it). This is set out below:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas – development on part of the site would not contribute to unrestricted sprawl as the site has well defined and strong defensible boundaries with a railway line to the west, roads to the east and north and existing residential development to the south. • To prevent neighbouring towns merging into one another – development on part of the site would not contribute to the merging of neighbouring towns. The site is located in the built up area. • To assist in safeguarding the countryside from encroachment – the site is located within an urban area and adjacent to other urban areas. 	<p>space and residential development has been defined by the London plan. In particular in these circumstances there is no requirement in the NPPF for LAs with Green Belt carry out a full review of land so designated.</p> <p>The consultee makes specific reference to paragraph 80 of the NPPF where the purposes of Green Belts are set out and point out why none of them apply to their site.</p> <p>Clearly these do not literally apply to MOL, however, the council maintain that the 'criteria' set out in Policy 7.17 D of the London Plan are the equivalent of the NPPF 'purposes', i.e. for designation as MOL, a site should:</p> <ol style="list-style-type: none"> a. contribute to the physical structure of London by being clearly distinguishable from the built up area; or b. include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London; or c. contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; or d. forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria. <p>Not every GB site fulfils all of the 'purposes' set out in the NPPF, but still have that designation. In the case of MOL the London Plan only requires that a site meet one of the criteria. The site in question is considered to fulfil all but c above.</p> <p>In support of their case for developing MOL, three nearby examples are cited.</p> <ol style="list-style-type: none"> 1. Land rear of 91-117 Copers Cope Road 2. Kent Country Cricket Ground, Worsley Bridge Road, and 3. Dylon International Ltd, Worsley Bridge Road 	
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		<p>Therefore, careful and sensitively sited and designed development would not encroach into the countryside.</p> <ul style="list-style-type: none"> To preserve the setting and special character of historic towns – the site does not have any specific heritage character whilst Beckenham is an attractive town, it is not a historic town. Accordingly, development on part of this site would not adversely affect this objective. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – the site already comprises some previously developed (brownfield) land. The limited infilling or partial or complete redevelopment could be carried out without having a greater impact on the openness of the land. <p>Therefore, it is clear from the above that the site serves none of these five purposes. It is well defined and has strong defensible boundaries. The essential characteristic of MOL is said to be its openness and permanence. At present, our client's site is private land and there is no public access.</p> <p>If an appropriate amount and carefully and sensitively sited and designed development on the site, they would be happy to provide wider public access to the site, either passively or for more active recreation and leisure use but which, importantly, would minimise any adverse impact on the openness of the MOL. As part of the facilitation of wider public access to the site, the land's overall quality would also be improved.</p>	<p>In the case of 1. This was allowed on appeal, 2, both the GLA and the council considered that the applicant had demonstrated that 'very special circumstances existed to warrant permission being granted, and there is a current application on the third which has yet to be determined.</p> <p>As with proposals for inappropriate development in the Green Belt, an applicant would have to show what 'very special circumstances' existed to warrant an exception being made to established policy and exceptional circumstances for land to be removed from MOL. It is not considered that the consultee has demonstrated that in this case</p>	
168_14	Dr Elanor Warwick Clarion Housing Group	A review of green belt would usefully cover examining the definition of open land / the 'openness' of sites within the green belt. We would be concerned if this review was extended to consider changing the definition of Metropolitan Open land which tends to be in highly populated areas and to be extremely well used.	The policy differs very little from the policy 7.17 in the London Plan and there is no intention to change the definition of MOL.	No modification
176_5	Ray Foster	Mr. Foster refers back to his comments concerning changes to the Green Belt (DLP176_4 above Draft	The NPPF does not deal with MOL as this is a London Plan concept not a national one.	No modification

		<p>Policy 49) saying that they apply equally to MOL changes.</p> <p>They are summarised as follows:</p> <p>National policy specifies that changes to the Green Belt can only take place where exceptional circumstances are specified.</p> <p>The plan fails to meet this requirement. It contains some rather general explanations why certain sites are to be excluded, e.g. to make way for new schools, or for school expansions, or to meet economic needs. It is not always clear that these are the only sites where the stated aims can be achieved.</p> <p>The justifications can seem little more than a convenient way to tackle urgent needs. Some expansion of the text may be need to demonstrate clear compliance with national policy and therefore soundness.</p>	<p>However, the London plan requires MOL to be stating in para 7.56 that:</p> <p>“The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL)”</p> <p>Paragraph 83 of the NPPF states:</p> <p>‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.’</p> <p>Ensuring the same degree of permanence for MOL is equally applicable.</p> <p>Concerns regarding the MOL boundary changes proposed to accommodate specific uses have been raised by others and are commented on in relevant site specific section of this report.</p> <p>The explanations for the changes set out in Policies Map Set 2 were given in an earlier consultation (Local Plan Draft Policies and Designations February/March 2014). These changes are considered to ensure that sites which no longer fulfil any of the criteria for designation as MOL cannot be used as exemplars for releasing undeveloped MOL land in the future. (e.g. the developments at the rear of 91-117 Copers Cope Road and the at the Kent Country Cricket Ground, Worsley Bridge Road,)</p> <p>It is not considered necessary to change the supporting text to achieve the aims of the policy.</p>	
<p>Draft Policy 51 - Dwellings in the Green Belt or on Metropolitan Open Land</p>				

113_1	John Escott, Robinson Escott Planning	<p>The policy is inconsistent with the NPPF in seeking to limit extensions to existing dwellings to 10% increase in floor area. There is no such restriction in the NPPF. Depending on the circumstances of each individual proposal, a larger extension may not be disproportionate to the original dwelling house, which is the relevant test. Also, the policy makes no account of the permitted development entitlements to dwelling house which, in certain circumstances, may well result in extensions significantly larger than 10% of the original dwelling house.</p> <p>In the circumstances, Criterion (a) should be amended to reflect the wording of the NPPF.</p>	<p>The NPPF in paragraph 89 states that:</p> <p>“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt”</p> <p>It then goes on to list the exceptions, one of which is:</p> <p>“the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building”</p> <p>The term ‘disproportionate’ is not defined in the NPPF and it does not say that local authorities cannot apply their own definition taking into account the local conditions. This is the approach Bromley has adopted by setting a limit in the policy. Rather than leave this open to debate, this has been set at 10% of the floor area of the original dwellinghouse. The ‘original building’ is defined in the Glossary of the NPPF and this is the same definition set out in the supporting text to the Policy.</p> <p>The permitted development rights have changed and this is acknowledged, because by its very nature any development undertaken does not require a planning application to be submitted and consequently this policy will not apply.</p> <p>It is not considered necessary to amend either the Policy or the supporting text as they are both seen as being in compliance with the NPPF.</p>	No modification
Draft Policy 52 - Replacement Residential Dwellings in the Green Belt				
112_1	John Escott, Robinson Escott Planning	<p>Garaging should only be incorporated into a floor space calculation if the dwelling to be demolished also involves demolition of garaging so that there is, therefore, a like for like comparison. Rights that exist under permitted development to erect outbuildings, including garages, should not weigh against an owner. Similarly, accommodation below</p>	<p>The NPPF in paragraph 89 states that:</p> <p>“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt”</p> <p>It then goes on to list the exceptions, one of</p>	No modification

		<p>ground would not necessarily harm the openness of the Green Belt or the purposes of including land within it.</p> <p>Criterion (a) should be amended, therefore, to be consistent with the fourth bullet point of paragraph 89 of the NPPF.</p> <p>The supporting text at 5.2.19 should delete 10%. Whether a proposal is 'materially larger' will involve a matter of judgement depending on the fact, circumstances and impact in each case impact in each case.</p>	<p>which is:</p> <p>“the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces”</p> <p>The term ‘materially larger’ is not defined in the NPPF and it does not say that local authorities cannot apply their own interpretation (e.g. including garages etc.,) taking into account the local conditions, this is the approach Bromley has adopted. Rather than leave the interpretation of ‘material’ this open to debate, Bromley has set 10% of the floor area of the original dwellinghouse as the standard considered acceptable.</p> <p>The permitted development rights have changed and this is acknowledged, because by its very nature any development undertaken does not require a planning application to be submitted and consequently this policy will not apply.</p> <p>It is not considered necessary to amend either the Policy or the supporting text as they are both seen as being in compliance with the NPPF.</p>	
Draft Policy 53 – Land adjoining Green Belt or MOL				
59_35	Matthew Frith, London Wildlife Trust	Supports this policy.	Support welcomed.	Note the support
61_7	Kieran Wheeler, Savills for Bellway Homes	<p>(Maybrey Works) They consider the requirements of this policy important, but feel that greater clarity as to how impacts should be demonstrated should be provided.</p> <p>It is suggested that the policy should clarify that impact should be demonstrated in a Design and Access Statement and/or Townscape Visual Impact Assessment.</p>	<p>It is expected that applicants would wish to demonstrate that their proposal would have no or minimal impact on the surrounding environment by including evidence to that effect with their submission.</p> <p>Therefore, it is not considered necessary to make the suggested addition to the text of the policy or to the supporting text.</p>	No modification
Draft Policy 54 – SE London Green Chain				
39_6	Andrew Dorrian, Transport for London	The policy is welcomed as it is in accordance with London Plan policy 6.10. They request that this is extended to enhance this and the wider Walk London network, through site specific mitigation	The Green Chain walk is shown on London Plan Map 6.3 'Walk London Network', although this map does not show the extension into the London Borough of Southwark. The actual	No modification

		measures and the use of CIL where appropriate.	treatment of specific sites is not considered a matter for a Local Plan. All of the land designated as Green Chain is also MOL and consequently the potential for development and the use of CIL is extremely limited. Should development which might be liable to CIL be permitted on any Green Chain site (probably only following an appeal decision, this would be something which would be taken into consideration.	
59_36	Matthew Frith, London Wildlife Trust	Supports this policy.	Support welcomed.	Note the support
71_14	Tony Allen, The Chislehurst Society	Sentiment understood – little action undertaken to maintain stretch of walk between Elmstead Lane and Chislehurst and Walden Road Recreation Ground.	The maintenance of the Green Chain Walk is an operational matter and would be approached through the relevant Council Department, it is not something which can be addressed in a Local Plan.	No modification
Draft Policy 55 – Urban Open Space				
38_21	Alice Roberts, CPRE London	<p>The CPRE refer to their previous submission in respect of the Draft Policies and Designations consultation in 2015, where this policy is numbered Policy 8.20</p> <p>The objection concerns the.</p> <p>They object to the Policy setting out circumstances under which development would be permitted on UOS. Sanctioning development of UOS should be avoided to ensure such sites are maintained for amenity and their environmental benefits. They are particularly concerned about the implications of land currently used as playing fields being designated for education, potentially paving the way for development and loss of green space where alternatives should be sought.</p> <p>In the changes to GB and MOL sites to UOS are paving the way for development on Green Belt and MOL.</p> <p>The last paragraph of the Policy should be replaced with a statement to the effect that all attempts will be made to preserve Urban Open Space from development.</p>	<p>Urban Open Space is a local designation which was introduced in the Bromley Borough Plan (1985) and encompassed sites which had previously been designated separately as education allotments and public or private open space/playing fields.</p> <p>As such, it is entirely in the gift of the local authority to determine what is or is not appropriate, depending on the prevailing situation and infrastructural demands. In policy terms, the UOS designation is not linked policies in either the NPPF or the London Plan.</p> <p>Of the sites being proposed, all but three are within the grounds of an existing school which have an open space designation.</p> <p>It should be noted that the majority of existing schools are within areas designated as open space of some description (<i>about 30% on GB, 5% MOL and 43% UOS</i>).</p> <p>It is considered that the policy as amended will still offer adequate protection to open space sites with this designation and the sites which are proposed for designation are fully justified.</p>	No modification

48_6	Jeff Field, JLL for Education Funding Agency	<p>They propose an additional clause d to the policy:</p> <p><i>d – The development is for educational buildings where there is a demonstrable need and there are no alternative, sequentially preferable sites available.</i></p> <p>They also propose an amendment to the final paragraph (in bold) below:</p> <p><i>Where there is a demonstrable need for additional educational buildings on Urban Open Space sites sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is possible without compromising the educational requirements. In all other cases the scale, siting, and size of the proposal should not unduly impair the open nature of the site”.</i></p>	<p>It is not considered that the additional clause adds anything to the Policy or the approach the council would take when considering additional sites for educational purposes.</p> <p>Adding ‘on Urban Open Space sites’ would be redundant as the name of the policy is ‘Urban Open Space’ and it would not be applied to any other sites.</p>	No modification
59_37	Matthew Frith, London Wildlife Trust	Supports.	Support welcomed.	Note the support
131_4	Gillian Bailey	<p>This Policy is considered to open the door to the total destruction of UOS already in education or allocated for such a use. As drafted there is absolutely no control over additional educational buildings covering the whole of Urban Open Space.</p> <p>It will always be possible to argue some form of “demonstrable need for additional educational buildings”. “Need” is a very nebulous concept often confused with “wish”. Once the wish/need has been expressed by the educational establishment it will be accepted that any limitation imposed compromises the educational requirements.</p> <p>There must be clear constraints on the extent of further development irrespective of educational requirements; otherwise there is a “blank cheque” for total oblivion of the UOS</p> <p>Permitting any form of development (educational or otherwise) on UOS should not be permitted in an area of open space deficiency shown on the</p>	<p>Urban Open Space is a local designation which was introduced in the Bromley Borough Plan (1985) and encompassed sites which had previously been designated separately as education allotments and public or private open space/playing fields.</p> <p>As such, it is entirely in the gift of the local authority to determine what is or is not appropriate, depending on the prevailing situation and infrastructural demands. In policy terms, the UOS designation is not linked policies in either the NPPF or the London Plan.</p> <p>Of the sites being proposed for educational purposes, all but three are within the grounds of an existing school which have an open space designation.</p> <p>It should be noted that the majority of existing schools are within areas designated as open space of some description (<i>about 30% on GB, 5% MOL and 43% UOS</i>).</p>	No modification

		<p>“Local Park Deficiency Map“. Draft policy 55 is inconsistent with draft policy 59.</p> <p>It is very difficult to see how this draft policy 55 complies with NPPF paragraph 74. This policy is neither justified nor consistent with national policy.</p>	<p>It is not considered that the policy will allow the amount of development the consultee envisages. Also the site is not in an area of Local Park Deficiency.</p>	
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Bromley Proposed Submission Draft Local Plan 2016 – Summary of Responses, June 2017

Draft Policy 56: Local Green Space, Appendix 10.8 Local Green Space and Policies Map Set 2: Urban Open Space (comment related to LGS)

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 56 - Local Green Space				
143_3	Bob Neil MP	Welcomes the clear inclusion of areas such as the Bull Lane allotments, Havelock Recreation Ground and Chislehurst Recreational Grounds, Walden Recreational Grounds and Whytes and Walden Woods as Local Green Space sites.	Support noted.	No modification.
59_38	Matthew Frith, London Wildlife Trust	Supports DLP 56 Local Green Space	Support Noted.	No modification.
155_1	Alan Duncan, The Beckenham Society	<p>The Plan has failed fully to implement the intentions of the Localism Act 2011, particularly on proposals for Local Green Spaces. Only two are included for Beckenham (Beckenham Green and Kelsey Park) whereas all other parks in the area deserve inclusion such as Croydon Road Recreation Ground, Crease Park, Churchfields Road Recreation Ground, etc., and other small green spaces such as Elmers End Green.</p> <p>Only referred to two, rather than three local green spaces incorporated in the Draft Plan in Dec 31 representations but notes that Cator Park has been incorporated.</p>	<p>The Local Green Space designation was introduced by the National Planning Policy Framework in 2012 which sets broad conditions and criteria for the designation of LGSs. Based on the NPPF, Planning policy Guidance and local planning specificities, Bromley developed Local Criteria for the Designation of Local Green Space which were agreed at the July 20ths Council's Executive. Criterion 1 sets out that <i>"The nomination is submitted through the Local Plan or Neighbourhood Plan process and is supported by the local community."</i> The Council invited sites nominations for the Local Green Space designation as part of a broad early 2016 consultation to provide relevant stakeholders, including all Duty to Cooperate and local consultation bodies on the council's consultation database, with the opportunity to nominate sites. The Beckenham Society itself was consulted at that stage and nominated Beckenham Green for consideration. Kelsey Park however was at that stage nominated by the Friends of Kelsey Park. Elmers End Green was at that stage nominated by the West</p>	No modification

			Beckenham Residents Association. All three sites were assessed against Bromley's Local Criteria for the Designation of Local Green Space using the methodology set out in the Local Green Space Background Paper to the Draft Proposed Submission Local Plan. The Background paper provides justification to the proposal to designate or not designate these sites. The other sites mentioned in the representation were not assessed because they did not come to the Council's attention as part of the early 2016 LGS consultation.	
148_2	Tony Banfield, Friends of Bromley Town Parks and Gardens	<p><u>All rejected Local Green Space Sites</u></p> <p>Sites nominated by the local community have been rejected for the LGS designation without explanation</p>	The assessment of the sites nominated for the Local Green Space designation as part of the early 2016 consultation are included in the Local Green Space Background Paper were assessed against Bromley's Draft Criteria for the Designation of Local Green Space following the methodology set out in Section 2 of the Paper and considering the information/evidence provided by respondents in support of the nomination of sites in site nomination forms as well as other sources of information as appropriate. The assessments provide justification as to why certain sites are proposed for designation as LGS in the Draft Local Plan whilst others are not.	No modification
181_11	Peter Martin, Bromley Civic Society	<p><u>Local Green Space Background Paper Sites 21 Grounds of Pixfield Court and 44 Valley Primary School Playing Fields</u></p> <p>Objects to the Grounds of Pixfield Court and Valley Primary school not being proposed for designation as Local Green Space and provides additional argument and evidence in favour of the designation.</p> <p>Section 46 of the Support Document 'Local Green Space' says that submissions for the Local Green Space designation are acceptable "...where they contribute to the character of the local area by:</p>	<p>The Grounds of Pixfield Court and Valley Primary School Playing Fields were assessed for the Local Green Space Designation following the methodology set out in Section 2 of the Local Green Space Background Paper (site 21 p 118 and site 44 p. 226 respectively). The assessments concluded that these sites do not meet all of the Criteria for designation and are not as a consequence proposed for designation in the Local Plan.</p> <p>The Grounds of Pixfield Court were considered not to meet criteria 1, 6 and 7, and to only partly</p>	No modification

		<p><i>Acting as a setting, for example, to an important local building or groups of buildings”.</i></p> <p>Provides historic information which shows that the grounds of Pixfield Court and Valley School Playing Fields are part of the historic curtilage of Pixfield Court- Grounds are the setting of Pixfield Court- View of Pixfield Court as described is largely intact.</p>	<p>meet criteria 4 and 8. Indeed, the site’s nomination by the Friends of Bromley Town Parks and Gardens is not considered to constitute adequate support from the local community and its limited access makes it partly local in character. In addition, the site’s qualities are not considered to be demonstrably special to the local community and to be adequately protected through the designation of Pixfield Court as the setting of a Grade II listed building and its inclusion within Bromley Conservation Area. The site is maintained by through maintenance arrangements arranged by its leaseholders but no evidence of this has been provided.</p> <p>The Valley School Playing Fields were considered to only partly meet criterion 1, and to not meet criteria 6 and 7. Indeed, the site’s nomination by the Friends of Bromley Town Parks and Gardens is not considered to constitute adequate support from the local community as these are private school grounds mainly enjoyed by pupils and staff. The site’s qualities are not considered to be demonstrably special to the local community and are deemed to be adequately protected though the inclusion of the playing fields in the setting of the Grade II Statutory Listed Pixfield Court, their inclusion in the Bromley Town Centre Conservation Area.</p> <p>The information provided in Peter Martin’s representation with regards to Pixfield Court and Valley School Playing Fields is the same which was provided as part of the site nomination and conclusions from the assessment do not change as a consequence.</p>	
148_2	Tony Banfield, Friends of Bromley Town Parks and Gardens	<p><u>Local Green Space Background Paper Sites 21 - Grounds of Pixfield Court and 44 Valley Primary School Playing Fields</u></p> <p>A number of sites are not being proposed for</p>	<p>Assessments for each site nominated for the</p>	No modification

		<p>designation without any justification which is unsound and unjustified.</p> <p>The criteria for designation were however carefully considered by the public and without justification there is doubt that the duty to cooperate with the public was fulfilled.</p> <p><u>Summary:</u> Objects to the Grounds of Pixfield Court and Valley Primary school not being proposed for designation as Local Green Space and provides the following arguments in favour of the designation.</p> <p>Section 46 of the Support Document '<i>Local Green Space</i>' says that submissions for the Local Green Space designation are acceptable "...where they contribute to the character of the local area by: Acting as a setting, for example, to an important local building or groups of buildings".</p> <p>Reiterates the historic information provided in the site nomination form as part of the early 2016 LGS consultation which shows that the grounds of Pixfield Court and Valley School Playing Fields are part of the historic curtilage of the listed Pixfield Court building – states that the Grounds are the setting of Pixfield Court- and that the View of Pixfield Court as described is largely intact.</p>	<p>Local Green Space designation as part of the early 2016 Local green Space consultation against the Criteria For The Designation of Local Green Space is included in the Local Green Space Background Paper. These follow the methodology for the assessment of sites set out in the paper and provide justification for the decision to propose or not propose sites for designation as LGS in the Draft proposed Submission Local Plan. This demonstrates the soundness of this process as part of the Local Plan.</p> <p>The assessment of the Grounds of Pixfield Court (site 21 of the Local Green Space Background Paper) concludes that the site does not meet all of the criteria for the designation of Local Green Space and is not being proposed for designation as a result.</p> <p>The information provided by the Friends of Bromley Town Parks and Gardens at the current consultation stage with regards to Pixfield Court is the same as that which was provided as part of the site nomination and conclusions from the assessment do not change as a consequence.</p>	
148_2	Tony Banfield, Friends of Bromley Town Parks and Gardens	<p><u>Local Green Space Background Paper Site 32 - Bromley Parish Church Yard</u></p> <p>Objects to the Bromley Parish Churchyard not being proposed for designation as Local Green Space.</p> <p>Bromley Parish Church is a Grade II listed building with positive contribution to the views to and from Church House Gardens it adjoins and which lie within the Town Centre Conservation Area.</p>	<p>Bromley's Parish Church Yard is assessed for the Local Green Space designation against Bromley's Draft Local Criteria for the Designation of Local Green Space following the methodology set out in Section 2 of the Local Green Space Background Paper (site 32, p. 170). The assessment concludes that the site does not meet all of the Criteria for designation and is not as a consequence proposed for designation in the Local Plan. The site was not</p>	148_2

			<p>considered to meet criterion 1, 6, and 7. Indeed its nomination is not considered to have benefitted from adequate support from the community, as it is privately owned and not falling under the remit of the Friends of Bromley Town Parks and Gardens who nominated the site without further support from the community. In addition, it is considered that its qualities are sufficiently recognised and protected through the designation of the church as a Statutory listed Grade II building and its inclusion within the Bromley Town Centre Conservation Area.</p> <p>The arguments provided in the Representation in favour of Bromley Parish Church Yard being designated as Local Green Space are already taken into consideration by the existing assessment and do not change its conclusions. Views to and from Queens Gardens from the Church yard are limited. Significant views towards the Church and its setting from Church Road are considered to be adequately protected through the Local Green Space and Conservation Area designations.</p>	
181_11	Peter Martin, Bromley Civic Society	<p><u>Local Green Space Background Paper Site 32 - Bromley Parish Church Yard</u></p> <p>Representation as above (DLP_148_2)</p>	Response as above (DLP_148_2)	No modification
84_1	Clive Lees, Ravensbourne Valley Preservation Society	<p><u>Local Green Space Background Paper Site 37 - Shortlands Golf Course</u></p> <p>Provides additional arguments for the site to be designated as Local Green Space with regards to the criteria against which the site was not considered to perform adequately as part of the assessment in the Local Green Space Background Paper to the Proposed Submission Draft Local Plan.</p> <p>Criterion 1: The site's nomination is being further supported by the Ravensbourne Valley Preservation Society, a residents' association of approximately</p>	<p>Shortlands Golf Course was nominated then by the Friends of Bromley Town Parks and Gardens as part of the early 2016 Local Green Space consultation. The golf course was assessed as site 37, p.195 of the Local Green Space Background Paper against the criteria for the designation of Local Green Space following the methodology set out in the Local Green Space Background Paper and considering the information and evidence</p>	No modification

		<p>500 subscribing members covering an area of 1500 homes centred on the Ravensbourne valley in Shortlands, which is particularly concerned with the maintenance and preservation of the environment. The society estimates that about 100 residents of the houses backing the site would belong to the residents association. It is stated that some of these will be members of the golf club although no numbers have been specified or evidence supplied.</p> <p>Criterion 4: RVPS states that the course is visible by circa 100 members living in the vicinity of the site. Visible from Ravensbourne Avenue, Farnaby Road, Warren Avenue Playing Fields. Part of continuous green space inc. golf course, playing fields, Goan playing grounds, Millwall playing fields, Beckenham Place Park.</p> <p>Criterion 6: RVPS: site is enjoyed by all those living around it. Site is well maintained and enhanced with a wide variety of plantings which enhance its appeal.</p> <p>Criterion 7: Ravensbourne Valley Preservation Society: The additional information provided should warrant the designation of the golf course as Local Green Space.</p>	<p>provided as part of the site nomination form. The assessment concludes that the site does not meet all of the criteria required to be designated as Local Green Space because it does not meet criteria 1, 4, 6 and 7 and it is unknown whether it meets criterion 8. As a consequence, it is not proposed for designation as Local Green Space.</p> <p>The additional arguments provided by the Ravensbourne Valley Preservation Society in favour of designating Shortlands Golf Course as Local Green Space have been taken into account into the site's reassessment against the Draft Criteria for the designation of Local Green Space, displayed in Appendix D2. This updated assessment shows that the case in favour of designating Shortlands Golf Course has been strengthened and that the site is now considered to partly meet criteria 1 and 4 thanks to the support of the Ravensbourne Residents Association. In light of the new arguments and evidence provided, it is however still not considered to meet criteria 5, 6 and particularly 7, because the site's qualities are considered to be adequately protected through its existing MOL, Green Chain and SINC designations considering the case for designation and the site's qualities. Whether it meets Criterion 8 remains unknown as the owners of the golf course have not confirmed future plans for the course. As a consequence, it is still not proposed for designation as Local Green Space.</p>	
126_1	Daniel Miller, Shortlands Residents Association	<p><u>Local Green Space Background Paper Site 37 - Shortlands Golf Course</u></p> <p>Provides further arguments for the site to be designated as Local Green Space making reference to the criteria against which the case for the site's nomination did not perform well in its assessment in</p>	<p>See Background to the nomination of Shortlands Golf Course and to its assessment in the Draft Local Green Space Background Paper as part of the early 2016 LGS</p>	No modification

		<p>the Local Green Space Sites Background Paper.</p> <p>Criterion 1. The site's nomination is being supported further at the proposed Submission Draft Local Plan stage by the legally constituted Shortlands Residents Association which represents some 1000 members. The Association seeks to promote and protect the interests of members living in Shortlands.</p> <p>Criterion 4: The golf course is historically significant as it was set up as a women's only golf course in the 19th century. Provides a visible and important break in the urban form, preventing the development of the suburbs in the 1920s and 30s which remains to this day, and provides a green lung. 150 properties, circa 300 people with back gardens overlooking the site.</p> <p>Criterion 6: Shortlands Residents Association Immediate local residents living adjacent to the golf course would regard the tranquillity, trees and sculpted open space as being something of beauty in an otherwise urban or suburban environment. The golf course is historically important, having been set up in the 19th century as a women only golf course. Proposed demise of the golf course in Beckenham place park means that this golf course must grow in importance even if it is not publicly accessible Area of particularly great tranquillity.</p> <p>Criterion 8: The fact that there are no known plans for the golf course is all the more the reason to designate the course as Local Green Space.</p>	<p>consultation in the response to rep DLP 84_1 above.</p> <p>The additional arguments provided by the Shortlands Residents Association in support of the designation of Shortlands Golf Course as Local Green Space have been taken into account into the site's reassessment against the Draft Criteria for the designation of Local Green Space, displayed in Appendix D2. This updated assessment shows that the case in favour of designating Shortlands Golf Course has been strengthened and that the site is now considered to partly meet criteria 1 one and 4 although support from the SRA has had limited weight in shifting balance. In light of the new arguments and evidence provided, it is however still not considered to meet criteria 5, 6 and 7, as the site's qualities are considered to be adequately protected through its existing MOL, Green Chain and SINC designations. Whether it meets Criterion 8 remains unknown as the owners of the golf course have not confirmed future plans for the course.</p>	
84_1	Clive Lees, Ravensbourne Valley Preservation Society	<p><u>Local Green Space Background Paper Site 45 - Warren Avenue Playing Fields</u></p> <p>States that the RVPS has only recently become aware of the LGS consultation and of its implications.</p> <p>Provides additional arguments for the site to be designated as Local Green Space with regards to</p>	<p>The Ravensbourne Valley Preservation Society was consulted as part of the early 2016 Local Green Space consultation and provided with the opportunity to nominate sites then. Warren Avenue Playing Fields was however nominated by the Friends of Bromley Town Parks and Gardens for the Local Green Space designation</p>	No modification

		<p>the criteria against which the site was not considered to perform adequately as part of the assessment in the Local Green Space Background Paper to the Proposed Submission Draft Local Plan.</p> <p>Criterion 1: Further support is being offered to the nomination of the site by the Ravensbourne Valley Preservation Society. The site is included in the area of remit of the Ravensbourne Valley Preservation Society. The RVPS's submission states that <i>"members take a direct interest in the maintenance of this area and in recent years have concerned themselves greatly with drainage, rubbish collection, litter picking, tree planting and general park maintenance"</i>. Further information or evidence about how members have concerned themselves with these issues is not supplied,</p> <p>Criterion 6: As per the site's assessment against criterion 1, the Ravensbourne Valley Preservation Society, which includes the park in its area of remit generally concerns itself with the maintenance and upkeep of the park. The RVPS states that <i>"the park is important to local residents and it is used a lot for general exercise and for sport at weekends. A lot of football is played on these fields"</i>. It also states that <i>"simply being an open green space in an urban environment accessible to the public makes this area special. Combined with the contiguous green areas to the north west and south it forms part of an extensive area of green space. It has extensive and interesting views to the west, varying over the seasons and the site is bounded by large trees, mixed borders and concomitant wildlife."</i></p> <p>Criterion 7: Given the above comments, believe that the Local Green Space designation is justified in providing an additional level of protection to this site.</p>	<p>at that time. The site was assessed against the criteria for the designation of Local Green Space following the methodology set out in Section 2 of the Local Green Space Background Paper and considering the evidence provided as part of the site nomination form (site 45, p 230 of the LGS Background Paper). The assessment concludes that the site does not meet all of the criteria required to be designated as Local Green Space because it does not meet criteria 1, 6 and 7 and it is unknown whether it meets criterion 8. As a consequence, it is not proposed for designation as Local Green Space.</p> <p>The additional arguments provided by the RVPS to support the designation of Warren Avenue Playing Fields as Local Green Space have been taken into account into the site's reassessment against the Draft Criteria for the Designation of Local Green Space, attached as Appendix D1. This updated assessment shows that the case in favour of designating Warren Avenue Playing Fields has been strengthened and that the site is now considered to meet criteria 1 and 8, as well as partly meeting criterion 6. It is however not considered that it meets criterion 7 because the site's combined designations as Metropolitan Open Land and Green Chain provide its qualities with a level which is commensurate to that which it would benefit from if it was designated as Local Green Space, considering the case for the designation of the site and its special qualities. As a consequence, it is still not proposed for designation as Local Green Space.</p>	
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71_16	Tony Allen, Chislehurst Society	Listing at 5.2.33 does not mention Bull Lane Allotments as being proposed for designation as LGS in error.	<p>Noted. Four sites have been omitted from the supporting text of the Local Green Space policy in error. This was acknowledged in the Errata dated 18.11.2016 to the Proposed Draft Submission Local Plan. The list will be amended to include :</p> <ul style="list-style-type: none"> • <u>Bull Lane Allotments, Chislehurst</u> • <u>Cator Park, Aldersmead Road, New Beckenham.</u> • <u>Downe Orchard, between Rookery Road and North End Lane, Downe</u> • <u>Royston Field, Franklin Road, Penge</u> 	<u>Minor modification</u>
76_3	Michael Bird and Tracey Cummings	<p>St Hugh's Playing Fields should be added to the list of sites to be designated as LGS reflecting its particular value and significance to the local community. This would be in accordance with para. 77 of the NPPF as:</p> <ul style="list-style-type: none"> • It is in close proximity to the local community of Bickley which it serves • It is demonstrably special to the local community and holds a particular local significance- as demonstrated by a petition opposing the building of a secondary school on the site with 702 signatures • It is a valuable green space in an Area of Open Space Deficiency and contains trees subject to a blanket TPO. It is a much loved "green lung" in an otherwise intensively developed area, characterised by a busy local road network. A very important local amenity. • It is local in character and not an extensive tract of land. 	<p>The Council consulted on Local Green Space in early 2016 at which time St Hugh's Playing Fields wasn't nominated for the designation.</p> <p>St Hugh's Playing field is allocated for secondary education in the Proposed Submission Draft Local Plan. A planning application for a secondary school on the site was considered by the Development Control Committee 25th Jan 2017. The committee resolved that "<i>permission be refused as recommended for the reason set out in the report of the Chief Planner but with the understanding that Members would welcome a second application</i>". The site is Urban Open Space and as such development is subject to Draft Policy 55 "Urban Open Space" in the Draft Proposed Submission Local Plan which makes provision so that where a need is demonstrated for additional education buildings sensitive design and siting will be sought to ensure the impact on the open nature of the site is limited as far as possible. The proposed school allocation will also mean that the land is subject to draft Policy 27 "Education" and therefore safeguarded for education land for the lifetime of the plan. The combination of these designations is appropriate to protect the open</p>	No modification

			nature of the site whilst acknowledging that the site is required to provide for other strategic needs within the Local Plan (namely the provision of education).	
82_3	Jenny Ding	<p>St Hugh's Playing Fields should be designated as LGS in the Local Plan.</p> <p>This small but valuable green space is in an Area of Open Space Deficiency and contains trees to a blanket TPO. It's a much loved "green lung" in an extensively developed area characterised by a local road network. It is an important local amenity.</p>	As above (response to 76_3).	No modification
105_3	Cherry Slater	Allocate St Hugh's as LGS to provide a much needed open space within a congested and busy local road network. Whilst it is not accessible to the wider public, its use could be widened, costs involved in maintenance could be shared for example by existing local schools in area which have extended and reduced own outdoor space.	As above (response to 76_3).	No modification
106_3	David Black	Designate St Hugh's Playing Fields to as LGS because of its particular value and significance to the local community. A small, but valuable, green space in an Area of Open Space Deficiency and contains trees subject to a blanket TPO - a much loved "green lung" in an otherwise intensively developed area, characterised by a very busy local road network. A very important local amenity.	As above (response to 76_3).	No modification
127_3	John Tiley	Much of Bickley is fully developed and there is little open space. Designate Hugh's Playing Fields as Local Green Space.	As above (response to 76_3).	No modification
139_3	Susan Savage	St Hugh's Playing Fields should be designated as Local Green Space under Draft Policy 56 given its value and significance to the local community. It is a small but valuable green space in an Area of Open Space Deficiency and contains wildlife and trees subject to a blanket TPO. Acts as a green lung in an otherwise intensively developed area. A very	As above (response to 76_3).	No modification

		important local amenity.		
145_2	Joan and Graeme Shankland	St Hugh's Playing Fields provides much needed green space to the local community and should be designated as Local Green Space.	As above (response to 76_3).	No modification.
154_3	Michael Crisp	<p>St Hugh's Playing Fields should be added to the list of sites to be designated as LGS because of its particular value and significance.</p> <p>It is a small but valuable green space in an Area of Open Space Deficiency and contains trees subject to a blanket TPO. A Green lung in an otherwise intensively developed area characterised by a very busy local road network. A very important local amenity.</p>	As above (response to 76_3).	No modification
162_3	Sandeep Kohli	<p>St Hugh's Playing Fields should be designated as a Local Green Space because of its particular value and significance to the local community.</p> <p>The St Hugh's Playing Fields is a small, but valuable, green space in an Area of Open Space Deficiency and contains trees subject to a blanket TPO. It is a much loved "green lung" in an otherwise intensively developed area, characterised by a very busy local road network. As such, it represents a very important local amenity.</p>	As above (response to 76_3).	No modification

Appendix 10.8: Proposed Local Green Spaces

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Appendix 10.8 – Local Green Space Sites				
24_1	Andrew Watson, Savills, for the Diocese of Rochester	<p><u>Proposed Local Green Space Site 46 - Bull Lane Allotments</u></p> <p>The proposed designation of the site as Local Green Space does not comply with the NPPF criteria, NPPG and Local Criteria for designation.</p> <p>Does not comply with para.7 of NPPG and specifically that the LGS designation should be consistent with the aims of local planning for sustainable development and identifying sufficient land to meet development needs.</p> <p>Bull Lane Allotments has the potential to help accommodate the vast need for schools in a context where school expansion is difficult due to open space allocations constraints.</p> <p>LBB Criterion 4 does not define a size threshold for a site to be defined as an extensive tract of land. Bull Lane at 1.5 ha could be considered an extensive tract of land.</p> <p>LBB criterion 5 states that a LGS should be reasonably close to the local community which it serves. This allotment site is used by a broad range of people some of whom are likely not to be from the site's close proximity. It could not be definitively said that the site is reasonably close to the community which it serves.</p> <p>Another test in criterion 5 is that the site must serve a local community. The site is gated and accessible to a limited number of people and there are no more available plots. As a result the site does not meet criterion 5.</p> <p>LBB Criterion 7- and Paras 10-11 of the NPPG</p>	<p>Bull Lane allotments was specifically assessed in the Education Background paper 2016 and ranked D meaning that it is a site which is not considered a realistic opportunity to meet need due to a range of site specific issues. This is referenced in the assessment of Bull Lane for the Local Green Space designation in the Local Green Space Background paper of the Proposed Draft Submission Local Plan.</p> <p>The assessment of Bull Lane allotments against the Draft Criteria for the Designation of Local Green Space agreed at the Council's Executive on July 20th is set out in the Local Green Space Background Paper (site 7, p.60) and follows the methodology included in Section 2 of the paper. The assessment considers the information and the evidence provided by the Bull Lane Action Group as part of the early 2016 Local Green Space Consultation and by the Diocese who own the site through the representation they made their agents as part of their consultation as landowners in December 2016. The assessment concludes that Bull Lane Allotments meets all the criteria for the designation of Local Green Space and is as a consequence proposed for designation as Local Green Space in the Proposed Submission Draft Local Plan. The arguments provided on behalf of Savills for the allotments not to be designated as LGS as part of the consultation on the proposed Draft Local Plan are the same as those which they made on behalf of the landowners in December 2016, when the Diocese was consulted as a result of their site having been nominated for the Local Green Space designation. These arguments did not change the outcome of the</p>	No modification

		<p>state that where sites are already protected through existing designations, consideration should be given as to whether additional local benefit could be given through further designation as LGS. The site is already designated as UOS and in the Chislehurst Conservation Area restricting proposals for built development. The site does not meet criterion 7.</p> <p>LBB criterion 8 requires that the site's special characteristics and any uses/activities forming part of the case for the designation should be able to be maintained and managed during the plan period. The site is on a restricted lease to LBB with the Diocese being able in theory to terminate this arrangement following a 6 months' notice period. The land would become unavailable and the site does not meet criterion 8 as a result.</p>	<p>assessment at the time. As a result, the outcome of the assessment has not changed. The assessment of Bull Lane Allotments is included in Appendix D7.</p>	
71_16	Tony Allen, Chislehurst Society	<p><u>Proposed Local Green Space Site 46 - Bull Lane Allotments & Site 48 Chislehurst Recreation Ground, Walden Woods, Whytes Woods and Walden Woods</u></p> <p>Note the proposed designation of Bull Lane Allotments as Local Green Space.</p> <p>Note the proposed designation of Chislehurst and Walden Road Recreation Ground.</p>	Noted.	No modification
71_16	Tony Allen, Chislehurst Society	<p><u>Proposed Local Green Space Site 48 - Chislehurst Recreation Ground, Walden Woods, Whytes Woods and Walden Woods</u></p> <p>The description of the football pitches of Chislehurst and Walden Recreation Ground as a kickabout does not do justice to these which are financially supported by the local football association and by the football foundation.</p>	<p>Noted - The following amendments are proposed to the Statement of Significance in Appendix 10.8 for Chislehurst Recreation Ground, Walden Woods, Whytes Woods and Walden Woods para. 3: "<i>There are also a range of recreational facilities: The Invicta Scouts hut is located on Chislehurst Recreation Ground, which is also home to Elmstead FC which secured funding to improve the now floodlit football pitches, (there is a kickabout on the site) and Chislehurst Tennis Club.</i>"</p>	<u>Minor modification</u>
83_6	Matthew Spry, NLP for Biggin Hill Airport	<p><u>Proposed Local Green Space Site 51- Downe Orchard</u></p>		No modification

		<p>Council proposed to designate Downe Orchard as a Grade II SINC. Site is located to the north west of the airport close to the boundary of BH airport safeguarding area. Protection of vegetation should not be enhanced. This poses a risk to the safe operation of the airfield on account of bird strikes. Increased protection of areas in and around the airport or safeguards of the airport could unduly restrict growth and development.</p>	<p>As set out in para 6 of the National Planning Policy Framework, the purpose of the planning system is to contribute to the achievement of sustainable development. This includes balancing its social, economic and environmental roles including helping to improve biodiversity.</p> <p>Downe Orchard as a SINC and as LGS will protect the biodiversity already on the site but will not per se enhance the value of which has been identified and assessed as part of independent processes.</p> <p>Most of the area around Biggin Hill Airport is designated as Greenbelt and includes various uses mostly farmland and woodland. Planning has no control over what is grown on sites and any crops grown on land in the vicinity is not subject to planning law, no matter how many birds it may attract.</p>	
119_4	Ken Lewington for the Crystal Palace Foundation	<p><u>Proposed Local Green Space Site 54 - Hollydale Open Space</u></p> <p>Incorrectly spelt reference to <u>Holydale</u> Open Space instead of <u>Hollydale</u> Open Space in the introductory title to the site's Statement of Significance.</p>	<p>Noted- the incorrectly spelt "Holydale" will be spelt "<u>Hollydale</u>" in the introductory title to the Statement of Significance in Appendix 10.8 of the Draft Local Plan.</p>	<u>Minor modification</u>
66_3	Victoria Barrett, NLP for LaSalle Investment Management	<p><u>Proposed Local Green Space Site 62- Queens Gardens</u></p> <p>Note the proposal to designate Queens Gardens as Local Green Space. The designation should not cut across/contradict the adopted policy within BTCAAP relating to site M and introduction of cafes/restaurants along the edges of the garden, introduced through planning permission APP/G5180/A/12/2189178.</p>	<p>The assessment of Queen's Gardens against the Draft Criteria for the Designation of Local Green Space is included in the Local Green Space Background Paper to the Local Plan (site 34, p 183). It follows the methodology set out in Section 2 of the Document. The site meets Criterion 6 as it is considered to be demonstrably special to the local community because of special qualities which relate to its historic significance. The curtilage of the historic gardens includes all of the area proposed for</p>	No modification

		<p>Any subsequent designation should not compromise further investment along the western edge of the garden. Cross reference to this potential is needed in the OSM policy or in LGS policy itself.</p>	<p>designation and it is not as a result proposed to alter the boundary of the area of the gardens proposed for designation. The assessment of the site against Criterion 3 further justifies the extent of the site designation in view of the delivery of Opportunity Site M in Bromley's Area Action Plan through the implementation of 12/01339/FULL1 allowed through appeal APP/G5180/A/12/2189178. More details are provided below.</p> <p>The development implemented through DC/12/01339/FULL1 following appeal decision appeal decision APP/G5180/A/12/2189178 covers 1670 sq. meters on site M, which slightly exceeds the size of the indicative development area (1650 sq.m) identified in the design guidelines for Site M in Appendix 5 of the Area Action Plan. Please refer to the Map in Appendix D4.</p> <p>For the reasons above it is considered that the development potential identified through policy OSM of the BTCAAP has been delivered and that the designation of Queens Gardens as Local Green Space does not contradict the Bromley Town Centre Area Action Plan.</p>	
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Bromley Proposed Submission Draft Local Plan 2016 Policies Map Set 2: Urban Open Space (comment related to LGS)

Policies Map Set Part 2, MOL to UOS boundary changes, p.25 of 75, Kingswood Glen				
98_2	Ishpi Blatchley	Queries why a triangle of land behind the electricity substation is proposed to be removed from UOS and whether the intended deletion is to the north (in front) of the electricity sub-station. Requires that this should be amended particularly as the site is designated as a Local Green Space in the Local Plan.	The site of the electricity substation is proposed to be deleted from its Urban Open Space designation as it is in private ownership and does not form part of the curtilage of Kingswood Glen which is in private ownership. As such, it is not proposed for inclusion in the Local Green Space boundary. Please refer to Appendix D6 for a Map of the area proposed to be removed from UOS.	No modification

Appendix D1.

Updated Assessment of Warren Avenue Playing Fields against Bromley's Draft Criteria for the Designation of Local Green Space following the consultation on the Proposed Submission Draft Local Plan

Warren Avenue Playing Fields		Ward Bromley Town
Nominated by The Friends of Bromley Town Parks and Gardens		
Site Description The site is playing fields in a residential area on the boundary with the London Borough of Lewisham.	Size 6.26 ha	Ownership London Borough of Lewisham
Planning Designations <ul style="list-style-type: none"> • Metropolitan Open Land • Green Chain 		
Is the site recommended for Designation? No		

Justification

The site only partly meets criterion 6

The site does not meet criterion 7

Please refer to the **Assessment of Warren Avenue Playing Fields against the Criteria for the Designation of Local Green Space** below for further information.





Proposed Local Green Spaces - Individual

- Warren Avenue Playing Fields
- Metropolitan Open Land
- Green Chain
- Sites of Importance for Nature Conservation

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Ordnance Survey 100017661.

Tuesday, October 18, 2016

 **Warren Avenue Playing Fields** 

0 25 50 75 100 125 150 metres

1 *The nomination is submitted through the Local Plan or Neighbourhood Plan process and is supported by the local community.”*

Does the site meet criterion 1?

No. The site was nominated by the Friends of Bromley Town Parks and Gardens. The Friend’s group remit however does not involve looking after this particular park which belongs to the London Borough of Lewisham. No evidence of support from other relevant user groups has been provided.

Update in the assessment of Warren Avenue Playing Fields against Criterion 1 following the consultation on the proposed Submission Draft Local Plan.

Further support was offered to the site nomination from the Ravensbourne Valley Preservation Society as part of the consultation on the proposed Submission Draft Local Plan. The site is included in the area of remit of the Ravensbourne Valley Preservation Society. The RVPS’s submission states that “*members take a direct interest in the maintenance of this area and in recent years have concerned themselves greatly with drainage, rubbish collection, litter picking, tree planting and general park maintenance*”. Further information or evidence about how members have concerned themselves with these issues is not supplied; however records from the RVPS’s website indicate that the residents association has raised issues re: litter and tree planting with Lewisham in 2013/14/15.

Does the site meet criterion 1? Updated Score

Yes. Whilst it is considered that the site’s nomination by the Friends of Bromley Town Parks and Gardens as part of the early 2016 LGS consultation did not constitute adequate support, the park being outside of the Friend’s group remit, further support from the Ravensbourne Valley Preservation Society was provided to the sit’s nomination as part of the December 2016 consultation on the Proposed Draft Submission Local Plan. The park is in the remit area of the RVPS and web records confirm the statement made by the Society’s Chairman Clive Lees that it has concerned itself with the general maintenance and improvement of the space.

2 *There is no current planning permission which once implemented would undermine the merit of a proposed Local Green Space designation.*

Does the site meet criterion 2?

Yes. There is no current planning permission on the site.

3 *The proposed Local Green Space site is not on land allocated for development in Bromley’s Development Plan or it can be demonstrated that its designation would not prevent the allocation being delivered. Where development sites are still emerging, nominations for Local Green Space will be taken into account along with other site constraints and opportunities.*

Does the site meet criterion 3?

Yes. The site is not on land allocated for development in Bromley’s Development Plan.

4 *The site proposed for designation is local in character and is not an extensive tract of land.*

Does the site meet criterion 4?

Yes. The site is local playing fields with outdoor pitches used by Lewisham Youth Football Club.

5	<p>Where the proposed site is publicly accessible, it is within walking distance of the community, or where the proposed site is not publicly accessible, it is within reasonable distance of the local community</p>
<p>Does the site meet criterion 5? Yes. The site includes publicly accessible local playing fields accessible via residential streets including Farnaby Road and Warren Avenue.</p>	
6	<p>The space being proposed for designation is demonstrably special to a local community and holds a particular local significance because of “special qualities” relating to, for example, its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife.</p>
<p>Does the site meet criterion 6? No. As per the site’s assessment against Criterion 1, the site’s nomination was not appropriately supported by the local community. As a consequence, it cannot be stated to be “demonstrably special to the local community”. This site was nominated together with Shortlands Goff Course yet no specific case has been made for its designation and the special and site specific qualities which the designation would seek to protect are unclear.</p> <p>Update in the assessment of Warren Avenue Playing Fields against Criterion 6 following the consultation on the proposed Submission Draft Local Plan. As per the site’s assessment against criterion 1, the Ravensbourne Valley Preservation Society which includes the park in its area of remit generally concerns itself with the maintenance and upkeep of the park. The RVPS states that “<i>the park is important to local residents and it is used a lot for general exercise and for sport at weekends. A lot of football is played on these fields</i>”. It also states that “<i>simply being an open green space in an urban environment accessible to the public makes this area special. Combined with the contiguous green areas to the north west and south it forms part of an extensive area of green space. It has extensive and interesting views to the west, varying over the seasons and the site is bounded by large trees, mixed borders and concomitant wildlife.</i>”</p> <p>Further information: Information on the Open Play website https://www.openplay.co.uk/view/1032/warren-avenue-playing-fields</p> <p>on the fusion website http://www5.fusion-lifestyle.com/centres/Warren_Avenue_Playing_Fields/facility/Outdoor_pitches</p> <p>and on the Lewisham Youth F.C website http://www.clubwebsite.co.uk/lewishamyouthfc/FindUs</p> <p>These websites provide additional information describing the football facilities on the site in some detail: Warren Avenue is host to six outdoor pitches. There are four large pitches, perfect for 11-a-side football as well as two smaller pitches suited to 7-a-side football. Warren Avenue is currently home to Lewisham Youth Football Club and is also available for private hire. The Warren Avenue pitches can be booked via Fusion Leisure who have just taken over the management of this Bromley sports facility. The Lewisham Toddler Youth Football group plays there every Saturday. The clubhouse includes changing facilities and toilets and there is carparking on the site.</p> <p>Views: towards the tree boundary to the north west inc. whitebeam. Poplars border to the south.</p> <p>Alleyway bordered with trees inc. cherry trees and lemon trees.</p>	

Wildlife is stated, but has not been evidenced- further information would be needed about this if a case for designation as LGS were to be made on that basis.

Site visits show people walking through, dog walking.

Does the site meet criterion 6? Updated score

Partly. The site is demonstrably special to the local community because of its recreational and general amenity value. As a local park, it is important to local residents who use it for leisure activities such as dog walking, exercise, and sports at weekends. It includes six outdoor sports pitches and is currently home to Lewisham Youth Football Club who use it during the weekend. It includes a clubhouse with changing and toilet facilities in addition to a carpark. The site is bounded by the back gardens of residential properties, themselves lined up with a tree cover to the east and the west, by a thicker tree boundary which separates it from Millwall Football Club Training Ground in Lewisham to the north, and by a poplar boundary to the south. It is accessible via Warren Street Avenue through an alleyway bounded by trees. Although important locally as a park, this particular park's qualities are less remarkable than other parks proposed for designation as local green space, being mainly grass and football pitches in an area which is not deficient in local parks.

The site's biodiversity value has not been evidenced. The site's inclusion as part of the chain of green spaces is not in itself a quality which deserves to be protected through the Local Green Space designation.

The park has no registered friends group although the Ravensbourne Valley Preservation Society takes an interest in the general upkeep of the park.

7 *The Local Green Space designation would provide protection additional to any existing protective policies and its special characteristics could not be protected through any other reasonable and more effective means.*

Does the site meet criterion 7?

No. As per the site's assessment against criteria 1 and 6, the site cannot be said to be "demonstrably special to the local community". The site's stated quality as a link in the Green Chain along the Ravensbourne Valley is adequately protected through its Local Green Chain Designation as this function is not specific enough to benefit from additional protection through the Local Green Space designation. Provided the shortcomings of the case made for designation it is considered that it is adequately and more effectively protected through its existing Green Chain and Metropolitan Open Land designations.

Does the site meet criterion 7? Updated Score

No. The site's stated quality as a link in the Green Chain along the Ravensbourne Valley is adequately protected through its Local Green Chain Designation as this function is not specific enough to benefit from additional protection through the Local Green Space designation. The site's stated qualities greatly depend on it being used as a park which includes MUGA facilities. No evidence was provided of the site's biodiversity value. The site is bounded by trees, including some Lombardy poplar trees along the southern boundary and on the western border, including some whitebeam trees. Considering the site's case for designation as summarised in the assessment against criterion 6, it is considered that the site's designation as Metropolitan Open Land, which provides it with a level of protection commensurate with that of the Greenbelt, combined with its designation as Green Chain provide the park's recreational and amenity values with a level of protection which is adequate and equivalent to that which would be afforded through the Local Green Space designation.

8 *The site's special characteristics and any uses of activities which form part of the case for its designation can be maintained and managed beyond the local plan period.*

Does the site meet criterion 8? (Updated Score)

Yes. The site is owned and managed by the London Borough of Lewisham. The service manager for Lewisham's leisure contracts stated that it is their intention to continue managing them as playing fields and that they have no plans at this stage to change this. Although this representative was unable to confirm that the playing fields would be able to be maintained and managed beyond the plan period it is considered that at this point in time the uses and activities which form part of the site's case for designation can be maintained and managed beyond the local plan period.

Appendix D2.

Updated Assessment of Shortlands Golf Course against Bromley's Draft Criteria for the Designation of Local Green Space following the consultation on the Proposed Submission Draft Local Plan

Shortlands Golf Course Meadow Rd, Bromley, BR2 0DX		Ward Bromley Town
Nominated by The Friends of Bromley Parks and Gardens		
Site Description The Shortlands Golf Course is to the north west of Bromley Town Centre and stretches over Barnaby Road. It is a backland site bounded by the back gardens of residential properties.	Size 13.7 ha	Ownership Private
Existing planning Designations: <ul style="list-style-type: none"> • Metropolitan Open Land • Green Chain • Site of Importance for Nature Conservation 		
Is the site recommended for Designation? No		

Justification

The site only partly meets criterion 1.

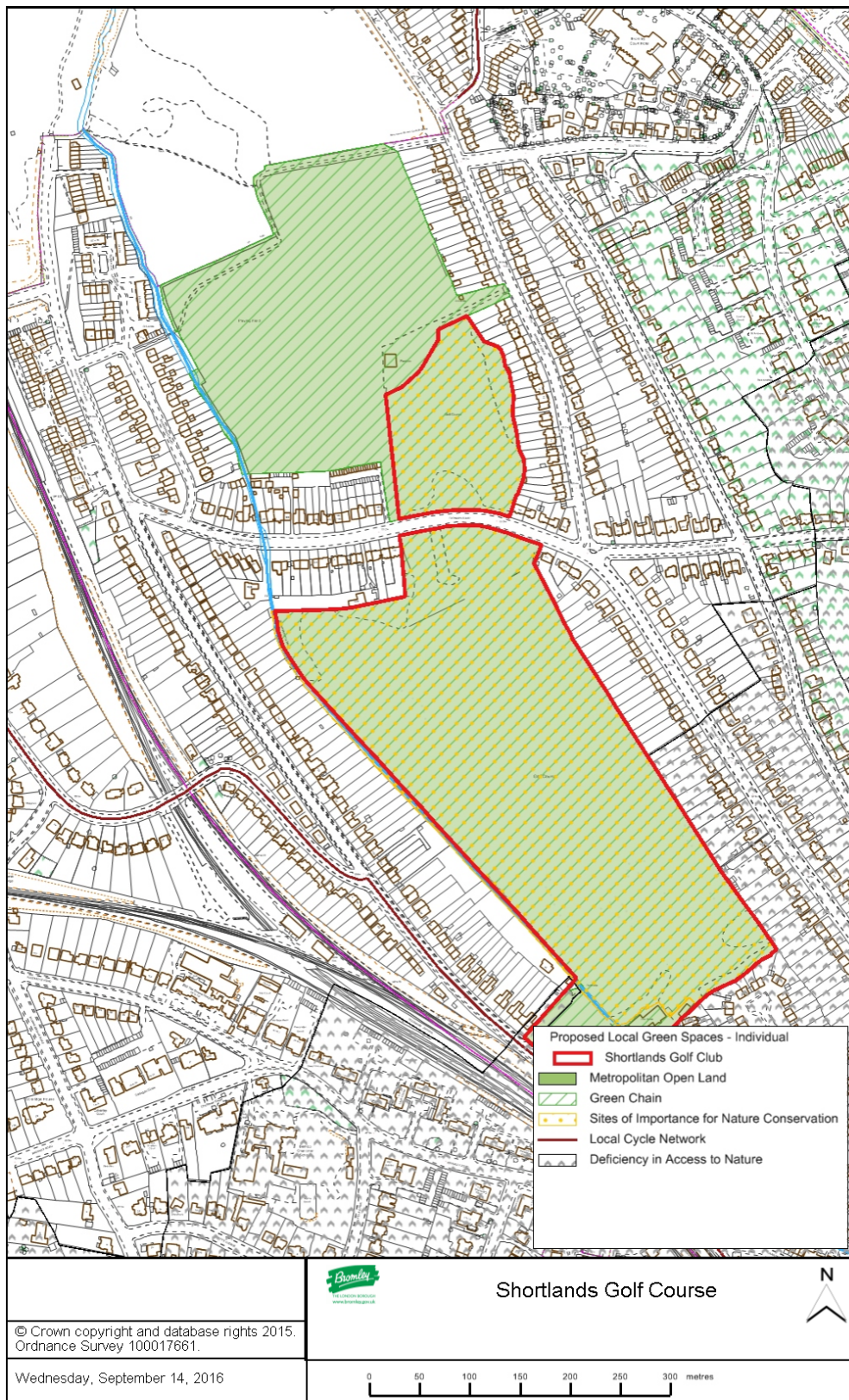
The site does not meet criterion 4.

The site partly meets criterion 5.

The site does not meet criterion 6.

The site does not meet criterion 7.

It is unknown whether the site meets criterion 8.



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Ordnance Survey 100017661.

Wednesday, September 14, 2016



Shortlands Golf Course



1 *The nomination is submitted through the Local Plan or Neighbourhood Plan process and is supported by the local community.”*

Does the site meet criterion 1?

No. The site was nominated by the Friends of Bromley Parks and Gardens who support Bromley Town Centre’s Local Park and other green/open spaces in the vicinity of the town centre with no further support from other more representative community groups which would be required to make a stronger case for the designation. The applicants indeed state that the site benefits the local community in “Shortlands and Environs” and mention its importance for the Ravensbourne Valley Preservation Society, members of the Golf Club and the adjacent residential areas yet no evidence of support from these parties have been provided.

Update of the assessment of Shortlands Golf Course against Criterion 1 following the consultation on the proposed Submission Draft Local Plan.

The site was nominated by the Friends of Bromley Parks and Gardens who are involved in the maintenance and improvement of Bromley Town Centre’s Local Park and other green/open spaces in the vicinity of the town centre but have no direct involvement with the maintenance of this site. The site’s nomination was supported further at the proposed Submission Draft Local Plan stage by the legally constituted Shortlands Residents Association which represents some 1000 members. The Association seeks to promote and protect the interests of members living in Shortlands. It needs to be noted however that the Shortlands Golf Course is not located in Shortlands Ward but in Bromley Town Ward. Given the nature of the site, which is a privately owned gold course with limited accessibility, it is not considered that the association necessarily represents the local community, especially as no information has been provided regarding the percentage of members which would also be clients of the Golf Course, and no residents of Shortlands would also have a house garden backing the course.

The site’s nomination was also further supported by the Ravensbourne Valley Preservation Society, a residents’ association of approximately 500 subscribing members covering an area of 1500 homes centred on the Ravensbourne valley in Shortlands, which is particularly concerned with the maintenance and preservation of the environment. The society estimates that about 100 residents of the houses backing the site would belong to the residents association. It is stated that some of these will be members of the golf club although no numbers have been specified or evidence supplied.

Does the site meet Criterion 1? Updated Score

Partly. As part of the consultation on local Green Space, the site was nominated by the Friends of Bromley Town parks and Gardens, who have no direct involvement with the golf course, whilst the site’s importance for the local community in “Shortlands and Environs” and for the Ravensbourne Valley Preservation Society and members of the golf club stated in the case for nomination was not evidenced at this stage. Evidence of support from the Shortlands Residents Association in the form of a letter seeking to supplement the case made by the Friends Group was provided following the consultation on the proposed Draft Submission Local Plan. As stated the association brings together 1000 residents of Shortlands Ward, however the golf course itself, which is not publicly accessible, is located in Bromley Town ward and the association could only ever partly be considered to represent the local community which would benefit from any of the site’s qualities, as the number of members who would also be members of the golf course are not stated, and no residents of Shortlands would be able to enjoy views of the golf course. The site’s nomination was further supported via a letter from the Ravensbourne Valley Preservation Society, residents’ association of approximately 500 subscribing members covering an area of 1500 homes is centred on the Ravensbourne valley in Shortlands and is particularly concerned with the maintenance and preservation of the environment. The letter stated that it was

estimated circa 100 members should have their gardens backing onto the golf course thus directly enjoying views of the site and that others would be members of the golf club, although no evidence was supplied. The assessment of the site against Criterion 6 brings demonstrates that the site's stated qualities could only partly be considered to be demonstrably special to the local community.

2 *There is no current planning permission which once implemented would undermine the merit of a proposed Local Green Space designation.*

Does the site meet criterion 2?

Yes. There are no planning permissions on the site.

3 *“The proposed Local Green Space site is not on land allocated for development in Bromley’s Development Plan or it can be demonstrated that its designation would not prevent the allocation being delivered. Where development sites are still emerging, nominations for Local Green Space will be taken into account along with other site constraints and opportunities.*

Does the site meet criterion 3?

Yes. The site is not land allocated for development as part of Bromley’s Local Plan.

4 *The site proposed for designation is local in character and is not an extensive tract of land.*

Does the site meet criterion 4?

No. Whilst it is recognised that the golf course is local to the Shortlands Ward, it is a private facility which is not publicly accessible but used by the golfing community and is mainly visible from a limited number of surrounding residential properties, with limited visibility from Farnaby Road. The site’s position as part of a chain of linked spaces does not make it local in character.

Update of the assessment of Shortlands Golf Course against Criterion 4 following the consultation on the proposed Submission Draft Local Plan.

The Ravensbourne Valley Preservation Society states that the course is visible by circa 100 members living in the vicinity of the site. It is visible from Ravensbourne Avenue, Farnaby Road and Warren Avenue Playing Fields.

Part of continuous green space inc. golf course, playing fields, Goan playing grounds, Millwall playing fields, Beckenham place park.

Shortlands Residents Association: The golf course has historic significance as it was set up as a women’s only golf course in the 19th century.

Provides a visible and important break in the urban form, preventing the development of the suburbs in the 1920s and 30s which remains to this day, and remains a green lung.

150 properties, circa 300 people with back gardens overlooking the site, estimate of 100 being members of Ravensbourne Valley Preservation Society.

Does the site meet Criterion 4? Updated Score

Partly. As per the site’s assessment against criterion 6, the character of this privately owned facility can mainly be enjoyed by an unknown number of local residents with views over the golf course and by the golfer’s community (whether the provenance of golfers is mainly local or not is unknown), the course having limited visibility from Farnaby Road and Ravensbourne Avenue and being as a result fairly secluded. The site’s position in the Green Chain itself does not make it local in character but rather enhances its position as part of a continuous chain of Green Spaces with more than local importance. The historic associations of the existing golf course with the original

women's golf course are not sufficiently materially embedded in the present site to make it local in character.

5 *Where the proposed site is publicly accessible, it is within walking distance of the community, or where the proposed site is not publicly accessible, it is within reasonable distance of the local community.*

Does the site meet criterion 5?

Partly. The site is in business as a golf course and thus, although not publicly accessible, within reasonable distance of the golfers community. Its beauty and quietness, stated as part of the case can also be enjoyed by the local residents whose gardens back onto the site.

Does the site meet criterion 5? Updated Score

Partly. The site is in business as a golf course and thus, although not publicly accessible, within reasonable distance of the golfers community who use the facilities although it is unknown whether most of these are from a catchment which can still be considered as local. Its beauty and quietness, stated as part of the case can also be enjoyed by the local residents whose gardens back onto the site.

6 *The space being proposed for designation is demonstrably special to a local community and holds a particular local significance because of "special qualities" relating to, for example, its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife.*

Does the site meet criterion 6?

No. The site is not considered to be demonstrably special to a local community. As per the assessment of the site's nomination against Criterion 1, this has not been adequately supported by the groups stated to enjoy what is being defined as the site's special qualities. Whilst the case for beauty and quietness and the site's function as a link are stated, no details are provided about how these qualities are being enjoyed and how they are special.

Update of the assessment of Shortlands Golf Course against Criterion 6 following the consultation on the proposed Submission Draft Local Plan.

Shortlands Residents Association

Immediate local residents living adjacent to the golf course would regard the tranquillity, trees and sculpted open space as being something of beauty in an otherwise urban or suburban

The golf course is historically important, having been set up in the 19th century as a women's only golf course. A book has been written about the Golf Course- "A History of Shortlands Golf Club: formerly the Beckenham Ladies' Golf Club, 1894-2000" by Glyndwr G Jones.

Proposed demise of the golf course in Beckenham place park means that this golf course must grow in importance even if it is not publicly accessible.

Area of particularly great tranquillity.

Ravensbourne Valley Preservation Society: site is enjoyed by all those living around it. Site is well maintained and enhanced with a wide variety of plantings which enhance its appeal.

Final score against Criterion 6

Summary

No. The site is a valuable recreational facility for the golfers community on its own and

in the context of the closure of the publicly accessible Beckenham Place Park golf course in Lewisham, however it is a private facility which can only be accessed by its paying members. Although it has interesting historic associations having started as a women's only golf course in the late 19th century, this stopped being the case after the second World War and it now a distinct golf facility which has much changed in landscaping and size. The course would be a valuable visual amenity and quiet space for golfers and frontagers however the privately accessible course is only partly visible from Ravensbourne Avenue and Farnaby Road, there may be only limited visibility from some of the backgardens adjacent to the course because of the thick tree cover.

Justification

The book mentioned "A History of Shortlands Golf Club: formerly the Beckenham Ladies' Golf Club, 1894-2000" by Glyndwr G Jones has been consulted for the purpose of assessing the significance of this site's qualities against Criterion 6.

Part of the golf course was in existence as a women only golf course founded in March 1894, once of 55 ladies golf club in England at the time. The club originally served privileged and middle class women in a context where some of these sought emancipation. Most of the members lived locally within cycling distance of the club. Following the first world war in 1919 however, and under the impetus of Edgar de Buriatte who lived in a property backing the site and became the Club's Secretary until 1927, the club reopened as the Shortlands Golf Club as a mixed golf course with men and women having equal rights. This particular significance of the golf course having been a women's only golf course is as a result no longer relevant to the existing golf course. The Golf course was extended after WW1 to include the former sites of adjacent allotments and of a nursery. Some of the trees on the course were planted by its members, including mature poplars and two trees in 1999 along the Greenwich meridian which runs through the site, so as to celebrate the new centenary. The freehold of the course was secured from the Cator Estate following attempts from private developers to obtain permission for private housing development in 1970-71. A new club house was completed in 1973 on a site at the entrance of Meadow Road and car parking laid out on the site of the old club house. The golf course acts as a social hub for its members, with regular competitions being held and social events taking place at the clubhouse. As such it is an important recreational and social facility for its members, and it is stated that this is particularly the case particularly following the closure of the Golf Course in Beckenham Place Park in Lewisham. Information about the provenance of the course's members however has not been provided and it is not known whether they are local or not and whether they previously used the Beckenham Place facility or not.

It is however recognised that the site would provide a valuable visual amenity to some of the local frontagers included in the area of influence of the Ravensbourne Valley Preservation Society with the property of some members backing the site likely to enjoy views over the landscaped and planted fairways. Specific evidence of the local frontagers to preserve the views of the site would have been useful to support the designation as some of these seem to enjoy limited visibility due to the thick tree boundary which lines up the backgardens of the properties surrounding the site. Visibility to the public is limited from Ravensbourne Avenue and Farnaby Road. The site's stated quietness would be enjoyed by golfers and frontagers alike.

7 *The Local Green Space designation would provide protection additional to any existing protective policies and its special characteristics could not be protected through any other reasonable and more effective means.*

Does the site meet criterion 7?

No. The site's stated quality as a link in the Green Chain along the Ravensbourne Valley is adequately protected through its Local Green Chain Designation as this function is not specific enough to benefit from additional protection through the Local Green Space designation. Provided the shortcomings of the case made for designation having regards to the site's assessment against criteria 1 and 6, it is considered that it is adequately and more effectively protected through its designations as Green Chain, MOL and as a Site of Importance for Nature Conservation.

Update of the assessment of Shortlands Golf Course against Criterion 7 following the consultation on the proposed Submission Draft Local Plan.

Shortlands Residents Association: updated case for designation means that the site should be provided with the Local Green Space designation.

Ravensbourne Valley Preservation Society: The additional information provided should warrant the designation of the golf course as Local Green Space.

Does the site meet criterion 7? Updated score.

No. Considering the updated case made for the site's designation as Local Green Space and the additional arguments made by the Ravensbourne Valley Preservation Society and the Shortlands Residents Association, it is considered that the site is adequately protected through its existing MOL, Green Chain and SINC designations. The site's function as a link in the Green Chain is not specific or local enough to benefit from additional protection through the LGS designation. The MOL designation already protects the site's recreational function to an extent commensurate to that which would be afforded through the Greenbelt designation. There are no plans to discontinue the site's function as a golf course and its biodiversity/wildlife is protected to a high level through its status as a Site of Importance for Nature Conservation (SINC).

8 *The site's special characteristics and any uses of activities which form part of the case for its designation can be maintained and managed beyond the local plan period.*

Does the site meet criterion 8?

Unknown. The site's freehold is owned by the trustees of the Golf Course. There are no known plans to discontinue the site's use as a Golf Course and no information has been provided regarding any plans which would affect the site's qualities which as per the site's assessment against Criterion 6 have not been demonstrated to be special to the local community in this instance.

Update of the assessment of Shortlands Golf Course against Criterion 8 following the consultation on the proposed Submission Draft Local Plan.

Shortlands Residents Association: the fact that what the future holds in store is not known is all the more the reason to designate the course as Local Green Space.

Final score against Criterion 8

Unknown. The site's freehold is owned by the trustees of the Golf Course. There are no known plans to discontinue the site's use as a Golf Course and no information has been provided regarding any plans which would affect the site's qualities which as per the site's assessment against Criterion 6 have not been demonstrated to be special to the local community in this instance.

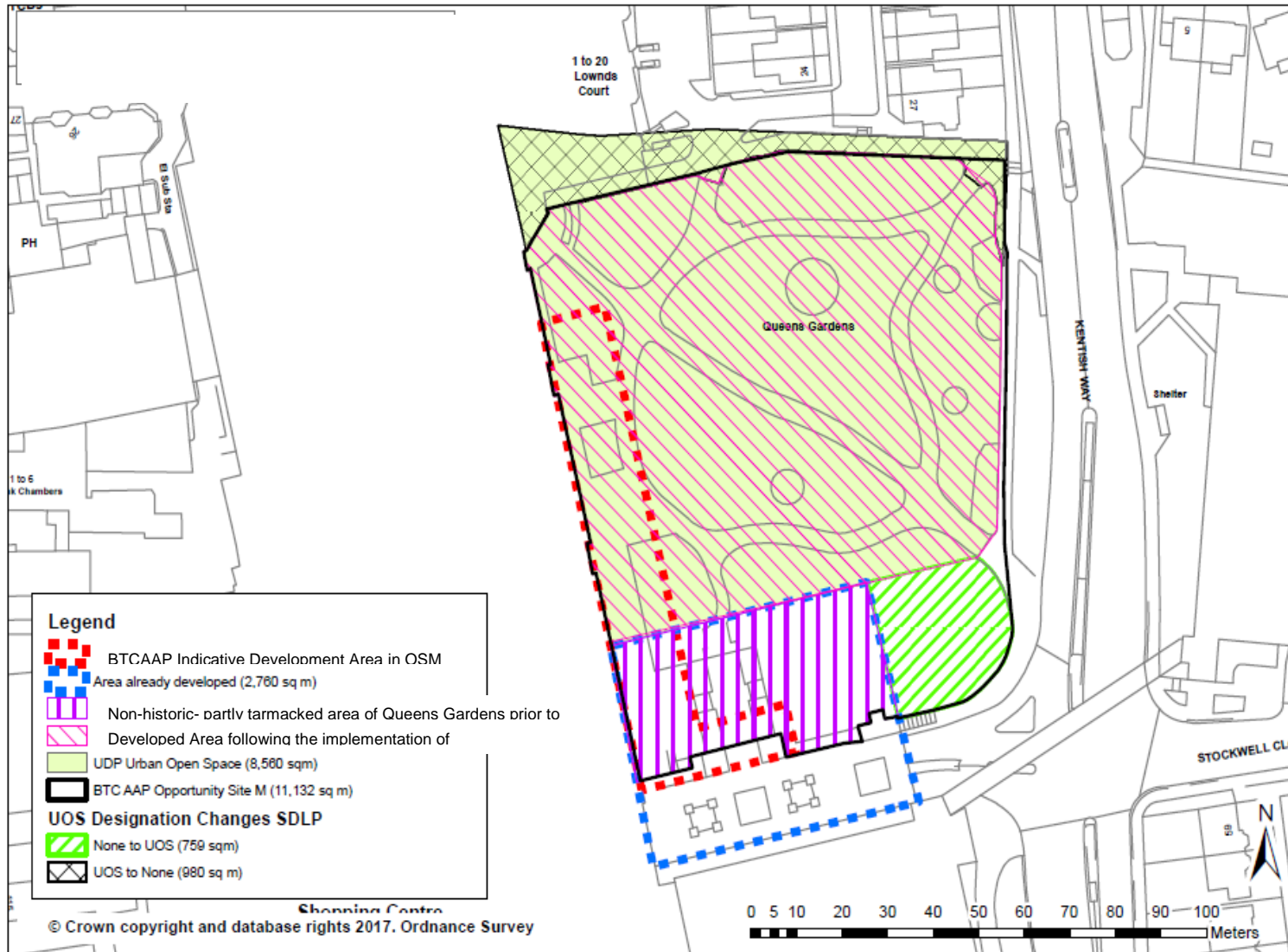
Additional Correspondence on Draft Local Green Space Policy 56 and Appendix 10.8 to the Local Plan Made Outside of the Proposed Draft Local Plan Consultation Process

Email dated December 13 2016	ain Tulloch, Friends of Hollydale Open Space	<p><u>Appendix 10.8- Proposed Local Green Space Site 54 Hollydale Open Space</u></p> <p>There is an incorrectly spelt reference to <u>Holydale</u> Open Space instead of <u>Hollydale</u> Open Space in the introductory title to the site's Statement of Significance.</p> <p>The "Friends of Havelock Recreation Ground" are incorrectly credited for fundraising line 11 of the Statement of Significance, these were the Friends of Hollydale Open Space.</p>	<p>Noted- the incorrectly spelt "Holydale" will be spelt "Hollydale" in the introductory title to the Statement of Significance in Appendix 10.8 of the Draft Local Plan.</p> <p>Noted. The incorrect reference to the Friends of Havelock Recreation Ground will be replaced by a reference to the Friends of <u>Hollydale</u> Open Space line 11 of the Statement of Significance for the site.</p>	<u>Minor modification</u>
Email dated November 26 2016	John Ince, Friends of Hoblingwell	<p><u>Draft Local Green Space Policy 56</u></p> <p>Para 5.2.33 Hoblingwell Wood and Recreation Ground. Please note the address is Leasons WAY and NOT Leasons HILL.</p>	<p>Noted. The incorrect reference to Leasons Way instead of <u>Leasons Hill</u> in the address for Hoblingwell Wood and Recreation Ground will be corrected in para 5.2.33, line 10.</p>	<u>Minor modification</u>
45_1 Email dated 22_12_2016	Mary Dawe	<p><u>Policies Map Set 2- Page 1 of Part 2 Referencing Table "Changes to Green Belt Designations".</u></p> <p>Site Number 27 "The</p>	<p>Error noted and correction proposed to reflect the text of the plan (Appendix 10.4 - Site 32). (Note: whilst Local Green Space designations are not illustrated in the Policies Map</p>	<u>Minor modification</u>

		<p>change" column in the referencing Table incorrectly states that the area is to change from GB to UOS For Education Purposes. The wording should reflect the fact that it has been agreed that this area be designated LGS and remain as allotments - Appendices pages 281 and 334/5, Appendices 10.8 site map no.65 and as previously agreed at a site visit on 1 April last.</p> <p><u>Map of the Proposed changes to GreenBelt designation page 16 of 44 –</u></p> <p>The Legend of area 27 has been incorrectly colour coded as being GB to UOS for Education Purposes. It is proposed that it become LGS for the continuation of allotments - Appendices 10 pages 281 and 334/5, Appendices 10.8 site map no.65 and as previously agreed at a site visit on 1 April last</p> <p><u>Proposed Local Green Space Site 65 – Bull Lane Allotments</u></p> <p>Draws attention to the following typographical inconsistency in the first sentence of the Statement of Significance (underlined):</p>	<p>Set Part 2 the site is also proposed Local Green Space, in Appendix 10.8 - Site 65.)</p> <p>Amendment for correction and clarity to</p> <ul style="list-style-type: none"> • ‘Changes to Green Belt Designations’ index “Site 27 Allotments between Former Blue Circle Sports Ground and Turpington Estate. GB to UOS For Education Purposes (also shown on UOS changes) <p>Map pg 16 of 44 Policies Map Set Part 2 ‘Proposed Changes to Green Belt Designations’ (specifically the deletion of reference to Education purposes on Site 27)</p> <p>Noted. The typographical mistake will be corrected to reflect the original intent of the sentence and will be amended to read “These allotments established in 1926 and laid out by local</p>	
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		"These allotments established in 1926 and laid out by local people, <u>are site with the largest capacity within a one kilometre radius</u> ".	people, are <u>the allotment site with the largest capacity within a one kilometre radius</u> ".	
Email dated 17_11_2016 Email dated 17_11_2016	Alex Ross	Notes that at 10.8 25 sites have been granted Local Green Space status, but at 5.2.33 only 21 locations are listed. Is this an error or is there some reason for this omission?	Noted. Four sites have been omitted from the supporting text of the Local Green Space policy in error. This was acknowledged in the Errata dated 18.11.2016 to the Proposed Draft Submission Local Plan. The list will be amended to include (in alphabetical order) : <ul style="list-style-type: none"> • <u>Bull Lane Allotments, Chislehurst</u> • <u>Cator Park, Aldersmead Road, New Beckenham.</u> • <u>Downe Orchard, between Rookery Road and North End Lane, Downe</u> • <u>Royston Field, Franklin Road, Penge</u> 	<u>Minor modification</u>

Appendix D4. Planning Designations, Development Areas and Site allocation Boundaries on Queens Gardens



Appendix D5. Opportunity Sites and Indicative Development Area Boundaries in Bromley's Town Centre Area Action Plan (including OSM)



Opportunity Sites E, F, M

- | | | | |
|--|---|--|---|
| | AAP / town centre boundary | | Development areas |
| | Site boundaries | | Key frontages |
| | Bromley north conservation area boundary | | Improved public realm and / or building frontages |
| | Protection and enhancement of listed or locally listed building | | New / improved pedestrian connection |
| | Existing landmark | | Protected parks and open spaces |
| | Protection and retention of the 'Bromley Oak' | | |

Source: Bromley's Town Centre Area Action Plan (2010), Appendix 5
http://www.bromley.gov.uk/downloads/download/194/bromley_town_centre_area_action_plan



Appendix D7- Extract from the Local Green Space Background Paper – Assessment of Bull Lane Allotments

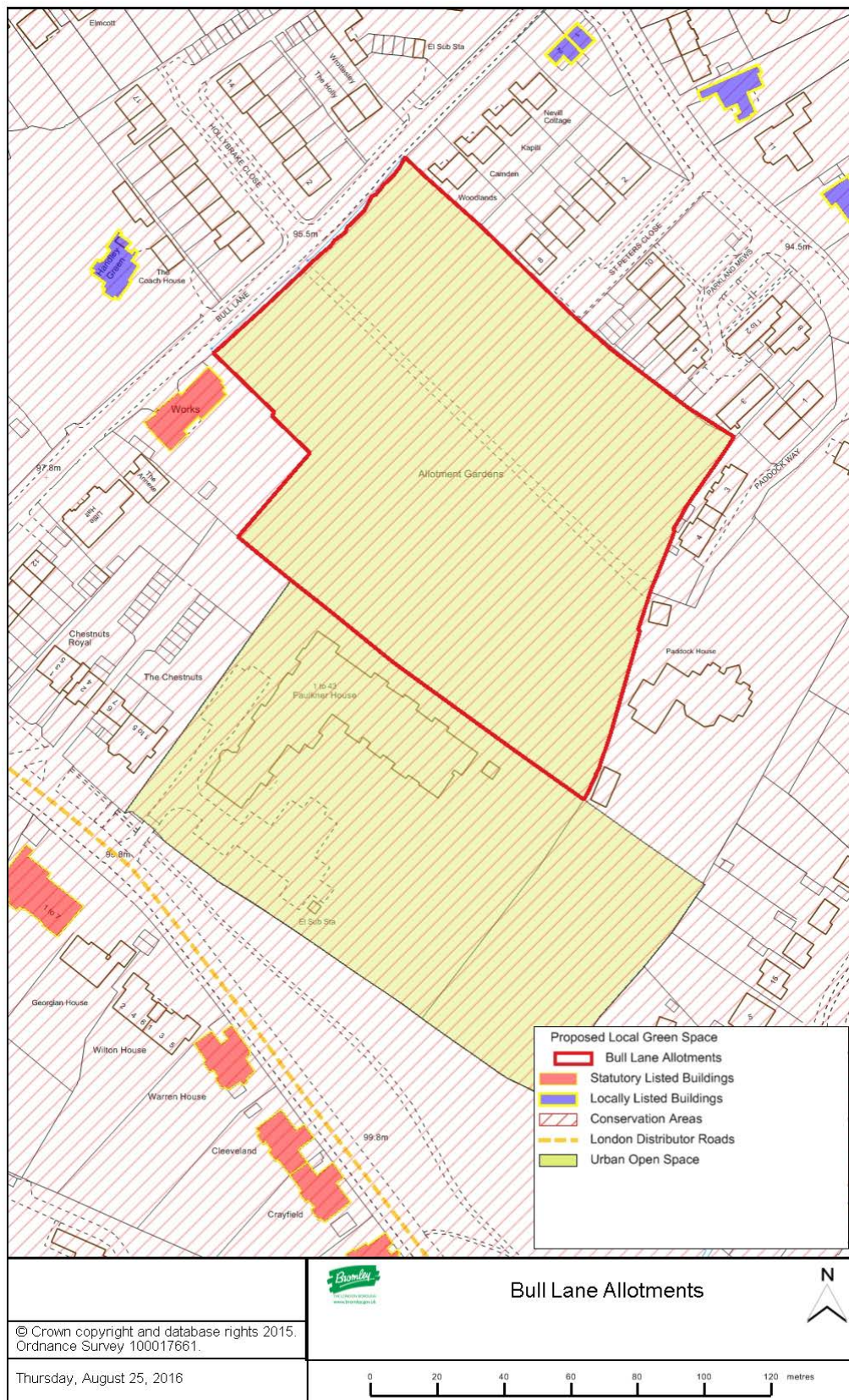
Bull Lane Allotments, Bromley Lane		Ward Chislehurst
Nominated by The Bull Lane Action Group		
Site description An open, green plot of land used exclusively for allotments. The site is bounded by residential properties, including flatted development, on three sides and by high hedges and Bull Lane to the south east.	Size 1.56ha	Ownership Private Leased to the London Borough of Bromley
Planning Designations <ul style="list-style-type: none"> • The allotments are at the heart of Chislehurst Conservation Area • The Allotments are designated as Urban Open Space • The site is adjacent to the Statutory Listed Easden House on Bromley Road. 		
Other <ul style="list-style-type: none"> • The site is designated as an Asset of Community Value 		
Is the site recommended for Designation? Yes		

Justification

The site is demonstrably special to the local community because of its historic significance, recreational value, quietness, and visual amenity. It has also some biodiversity value.

Proposed Statement of Significance

Bull Lane allotments were laid out in the late 19th century to provide food to the rector and for the working families of Chislehurst. They include 80 plots tending to all sections of the community as well as an orchard, a plot for the children of local St Nicholas School and a pond. The site provides an exclusive, quiet, secluded and beautiful recreational space enjoyed by the allotment holders and the inhabitants of adjacent overlooking properties. The plots are regularly laid out in a regular pattern in a lawned area enclosed by high hedges and trees with views to the rear of the Statutory Listed Neasden House to the west. The site has been documented to accommodate the following protected mammals amphibians and reptiles: Common Shews, Common Toads and Slow Worms. Its north western hedgerow provides a good mix of native species including Common Hawthorn and Hazel providing a habitat important for Bromley and providing shelter for birds and invertebrates as well as mammals and reptiles. Long grass along the hedge provides an important habitat for pollinators and the site provides a variety of nectar sources which can generally be considered to benefit pollinators.



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Ordnance Survey 100017661.

Thursday, August 25, 2016



Bull Lane Allotments



Assessment of Bull Lane Allotments against Bromley's Local Criteria for the Designation of Local Green Space

1 *The nomination is submitted through the Local Plan or Neighbourhood Plan process and is supported by the local community.*

Does the site meet criterion 1?

Yes. The site was nominated by the Bull Lane Action Group who petitioned the Council showing 1300 signatures for the site to be designated as Local Green Space in June 25 2015. The application is supported by the Chislehurst society and 17 testimonials from a majority of ploholders and local residents have been provided to emphasize the importance of the allotments to the community. Applicants state that the designation is also supported by Local Councillors and the Member of Parliament. 92 householders wrote in support of the application.

2 *There is no current planning permission which once implemented would undermine the merit of a proposed Local Green Space designation.*

Does the site meet criterion 2?

Yes. There are no planning applications on the site.

3 *The proposed Local Green Space site is not on land allocated for development in Bromley's Development Plan or it can be demonstrated that its designation would not prevent the allocation being delivered. Where development sites are still emerging, nominations for Local Green Space will be taken into account along with other site constraints and opportunities.*

Does the site meet criterion 3?

Yes. The site is not land allocated for development in Bromley's Local Plan.

4 *The site proposed for designation is local in character and is not an extensive tract of land.*

Does the site meet criterion 4?

Yes. The 1.56 ha site is surrounded and clearly bounded by residential properties- some of which enjoy views of the site- and hedges and utilised by the local community of allotment holders. The site is also opened to local residents when open days take place.

5 *Where the proposed site is publicly accessible, it is within walking distance of the community, or where the proposed site is not publicly accessible, it is within reasonable distance of the local community.*

Does the site meet criterion 5?

Yes. The site is accessible by key by the 80 plot holders local to the area or accessible by bus and car from tenants further afield. The site is opened up by to nearby residents when open days take place.

6 *The space being proposed for designation is demonstrably special to a local community and holds a particular local significance because of “special qualities” relating to, for example, its beauty, its historic significance, its recreational value, its tranquillity or its richness of wildlife.*

Does the site meet criterion 6?

Yes. Please refer to the **Proposed Statement of Significance**.

7 *The Local Green Space designation would provide protection additional to any existing protective policies and its special characteristics could not be protected through any other reasonable and more effective means.*

Does the site meet criterion 7?

Yes. The allotments are not statutory allotments and therefore not protected by the relevant legislation and are not guaranteed to continue in that use because of existing lease arrangements. The site is designated as UOS which protects the sites recreational use not its specific function as allotments. Chislehurst's Conservation Area Statement makes no mention of this site's specific contribution to the conservation area or to its use as allotments and the CA designation thus affords limited protection to this particular use which will however be recognised through the LGS designation.

8 *The site's special characteristics and any uses of activities which form part of the case for its designation can be maintained and managed beyond the local plan period.*

Does the site meet criterion 8?

Yes. Whilst the allotments are in private ownership and leased to Bromley Council with letting arrangements being able to be terminated with six months' notice, the LGS designation would provide additional protection to the specific use of the site as allotments for the length of the plan period as a minimum. The maintenance of the allotments is carried out by the Bull Lane Allotments Society through rents levied by the allotment holders and should endure as long as the demand for the allotments is there and the management structure exists.

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

Section 5.2 – Policies 57 to 67

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 57 – Outdoor Recreation and Leisure				
59_39	Matthew Frith, London Wildlife Trust	We support in principle this policy as long as proposals that seek to further recreation and leisure do not adversely impact on the nature conservation interests of the site; we expect policies under section 5.3 to apply.	Support welcomed. Other policies and designations in the plan will be applied where applicable in the case of any proposals for development.	No modification
121_4	Matthew Blythin, DHA Planning for Cray Wanderers Football Club	<p>The draft policy provides specific allowance for outdoor recreational development in the Green Belt where it constitutes appropriate development as defined in the NPPF. This policy, when read with draft Policy 49 which is wholly consistent with the NPPF, does not provide an effective or consistent approach in that the potential for new outdoor recreational development in the Green Belt, properly justified by very special circumstances (and therefore consistent with both the NPPF and draft Policy 49), is not recognised.</p> <p>In such circumstances, such as the Cray Wanderers FC proposals at Flamingo Park, which have been supported by the Council on the basis of very special circumstances, this draft policy would not on its own offer clear support, contrary to the remainder of the draft plan (see also draft policies 20, 21, 26, 49 & 58) and NPPF.</p> <p>Given the above, it is requested that the policy be amended to read (proposed additional text underlined):</p> <p>a - Within the Green Belt or MOL the proposal constitutes appropriate development or use of land, as defined in the National Planning Policy Framework, <u>or is justified by very special circumstances.</u></p> <p>This amendment is considered necessary to ensure the Plan is consistent with national policy and effective and therefore sound.</p>	<p>The case of the Cray Wanderers FC proposals at Flamingo Park is the subject of a Secretary of State's call-in appeal; the Inquiry is to be held in April 2017. In view of this it is not proposed to comment on the issues involved here as it would be premature pending the outcome of the appeal.</p> <p>As far as clause a. of Draft Policy 57 is concerned, there are numerous policies associated with GB and MOL where 'very special circumstances' might be proffered to justify development which would otherwise be considered inappropriate. If the consultees suggested amendment were accepted, similar additions would have to be made to these as well for consistency.</p> <p>The main policy as far as GB is concerned is Draft Policy 49, which the consultee agrees is consistent with the NPPF, and this clearly states that where development is in appropriate, 'very special circumstances' would have to be demonstrated for permission to be granted. In the case of any proposal in the GB this policy would be used in conjunction with the other policies relating to the type of development proposed, consequently there is no reason to continually make reference to 'very special circumstances'.</p>	No modification

Draft Policy 58 – Outdoor Sport, Recreation and Play				
58_6	Dale Greetham, Sport England	<p>This section and Policies 58 and 59 should be in line with Sport England’s Land Use Planning Policy Statement ‘Planning for Sport Aims and Objectives’. The statement details Sport England’s three objectives in its involvement in planning matters;</p> <p>1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.</p> <p>2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.</p> <p>3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.</p> <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>Whilst the policy does not list the objectives referred to, it is considered that, in conjunction with the supporting text, the policy as it stands embodies the sentiments and aims set out in the Sport England document. It is also considered to meet the requirements of the NPPF.</p> <p>In addition and the fact that Sport England are required (as a statutory consultee) to be consulted on any application effecting playing field land ensures that their views are taken into account.</p>	No modification
59_40	Matthew Frith, London Wildlife Trust	We support this policy and the commitment under (a), that “proposals address nature conservation, Green Belt and Open Space Policies.”	Support welcomed.	Note the support
121_5	Matthew Blythin, DHA Planning for Cray Wanderers Football Club	<p>This draft policy seeks to retain sports, recreation and playing fields and resists their loss unless demonstrated to be surplus to requirements. This aim and the draft policy is supported, particularly in the context of the Flamingo Park proposals, which seek to retain and enhance the existing sports use and secure a long-term sporting and community future for the site.</p> <p>Notwithstanding this support for the draft policy, it is considered the policy should also include wording that confirms the Council’s intention to work constructively with local organisations to deliver facility enhancements and community access where possible. This would make the policy more deliverable and effective.</p>	<p>Support welcomed.</p> <p>The departments within the council involved in the promotion of sport and active recreation, in conjunction with Sport England are the vehicles through which promotion of initiatives for improvement of facilities would come prior to any involvement on the planning side.</p> <p>It is the aim of the policy to resist the loss of sport recreation and play facilities and it is considered that this can be achieved through the policy as it stands.</p>	No modification

97_1	John Escott, Robinson Escott Planning on behalf of Bromley Football Club	This policy should be reworded to include reference to the provision of a new sports hub in Norman Park to include a new football stadium, a new athletics stadium together with ancillary and related facilities. The proposals map should be amended to include an area of Norman Park which includes the existing athletics track together with an appropriately sized area to the east as a proposed allocation for a new sports hub.	e The existing Norman Park athletics stadium site is subject to numerous constraints including its Green Belt designation. Any development of this nature would be an inappropriate use and exceptional circumstances would have to be demonstrated for such a policy to be considered in the absence of evidence that the proposal is appropriate development.. Norman Park is a public open space, a district park in a key location, available for people to use free of charge. A stadium of the type suggested would be a commercial enterprise not open to the public, taking up space out of the public realm. In combination with the parking required it would reduce Norman Park to a District park, increasing the area of District Park deficiency.	No modification
Draft Policy 59 – Public Open Space Deficiency				
58_7	Dale Greetham, Sport England	This section and Policies 58 and 59 should be in line with Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'. The statement details Sport England's three objectives in its involvement in planning matters; 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport. 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable. 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation. Furthermore, this section and policies should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy	See comment against DPL58_6 above	No Modification
59_41	Matthew Frith, London Wildlife	Supports.	Support welcomed	No modification

	Trust			
Draft Policy 61 – Horses, Stabling and Riding Facilities				
18_3	Katie Miller, Kent Downs AONB	<p>Where proposals are in the Kent Downs AONB, special care needs to be taken to ensure that the special qualities of the AONB are not challenged, in accordance with</p> <p>The Countryside and Rights of Way Act 2000 section 85 and paras 113 and 115 of the NPPF. We consider it important to include specific reference to proposals within the AONB needing to conserve and enhance the AONB. The Kent Downs AONB Unit has produced guidance on equestrian developments - 'Managing Land for Horses' and it would be helpful for reference to this to be included in the policy or supporting text.</p>	<p>The majority of policies in the Draft Plan will, depending on the development proposed be applicable to sites in the AONB, but is not considered necessary to make specific reference to the AONB in them.</p> <p>Many interest groups publish their own guidance (e.g. The British Horse Society) but it is not considered to make reference to additional guidance, other than that published by the Government or the GLA in a statutory Local Plan.</p>	No modification
58_8	Dale Greetham, Sport England	This policy is overly restrictive and should be revised to reflect Objective 2 of Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives'.	This policy is not considered to be over restrictive, it was originally following unacceptable horse related activities which were occurring, particularly in the Green Belt which were overly intensive, detracted from the attractiveness of countryside areas. It is also considered that the policy will assist in ensuring good equine welfare.	No modification
Draft Policy 62 – Agricultural Land				
176_6	Ray Foster	Does not consider this policy sound or reasonable. It is a case of the Council seeking to have its policy cake and eat it. Once developed, BVL is never likely to return to its former agricultural use or quality and it is unreasonable to seek to require developments to provide for this.	<p>Natural England was consulted at all stages in the preparation of this plan as a statutory consultee and no representations were received from them concerning the soundness of this policy.</p> <p>In the case of planning applications for non-agricultural development proposals not consistent with the local plan, where best and most versatile agricultural land is involved, Natural England would be consulted as required by the Development Management Procedure, Schedule 4 (y) 2015.</p>	No modification
Draft Policy 67 - Minerals Workings and Associated Development				
59_42	Matthew Frith, London Wildlife Trust	Supports.	Support welcomed	No modification

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

Section 5.3 – Nature Conservation and Development

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 5.3 – Nature Conservation and Development				
51_2	Charles Murithi, Environment Agency	There is need for a policy on the water environment beyond flood risk and sustainable drainage systems which is currently lacking. This will ensure that the Council can carry out its statutory function in protecting and delivering the Water Framework Directive (WFD) objectives contained in the Thames River Basin management plan.	The London Plan contains a set of policies to guide opportunities for improvements along the Blue Ribbon network, which in Bromley borough includes the River Cray and Ravensbourne, and their tributaries - Policy 7.28 suggests how development proposals should restore and enhance the network. Bromley's Draft Local Plan takes this further where the potential for coordinated future (re)development has been identified (during the lifetime of the plan). Draft Plan Policy 17 – <i>The Cray Valley Renewal Area</i> – expects proposals “to protect and enhance” the River Cray, but in order to make this more robust, a minor amendment is being proposed (see the proposed change to the policy in the response table for section 2.3 <i>Renewal Areas</i>).	No modification
59_55	Matthew Frith, London Wildlife Trust	The Mayor's <i>London's world heritage sites: guidance on settings supplementary planning guidance</i> (2012, para 2.16) states as part of their Local Development Frameworks (LDFs), each of the boroughs in which World Heritage Sites are located have policies in their Core Strategies, Management Documents and relevant Area Action Plans which seek to ensure that World Heritage Sites and their setting, as well as other heritage assets are conserved and enhanced. Adjoining borough plans also contain policies which seek to conserve and enhance World Heritage Sites. Darwin's landscape laboratory is listed in the Mayor's SPG and listed in the UK Government's Tentative List (2012-2022), so any planning application has to take these into account. Therefore the proposed WHS and its setting needs to be specifically referenced in the Local Plan. See London Plan Policy 7.10 <i>World Heritage Sites</i>	The area defined as the potential heritage site in the Mayor's London World Heritage Sites SPG, in line with its status with the UNESCO, includes a variety of planning designations which provide a strong level of protection and safeguarding to its nature conservation value and openness as well as historic significance. The plan making process provides the flexibility required so that should/when the site be designated as a World Heritage Site new policies and guidance can be prepared and adopted in line with the relevant Mayor's SPG and London Plan policy 7.10 on World Heritage Sites.	No modification.

	Matthew Frith, London Wildlife Trust	We recommend that the introductory text is amended to: “ <i>Local authorities are required by The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) to have regard to the desirability of conserving the natural beauty and amenity of the countryside, and a duty to have regard for biodiversity commensurate with their functions under the Natural Environment and Rural Communities Act (NERC) 2006</i> .” ⁴ <i>This duty embraces the conservation of flora, fauna, geological and physiological features and extends to urban as well as rural areas.</i>	<p>Agree. The Council’s duty to have regard to biodiversity would be usefully signposted in Para 5.3.1 under Section 5.3, Nature Conservation and Development. The following amendment is therefore proposed: <u>5.3.1.</u> “<i>Local authorities are required by The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) to have regard to the desirability of conserving the natural beauty and amenity of the countryside, and a duty to have regard for biodiversity commensurate with their functions under the Natural Environment and Rural Communities Act (NERC) 2006</i>”.</p> <p>This will tie in with the proposed response to DLP rep. 184_1 which proposes the addition of a sentence at the end of para 5.3.2 explaining the role of <i>Bromley’s Biodiversity Plan</i> in relation to the Council’s Biodiversity Duty as set out in the NERC.</p>	<u>Minor Modifications to the supporting text.</u>
143_6	Bob Neill MP	Concerns over the felling of trees in Conservation Areas.	<p>Noted. The special contribution of certain trees to the character and appearance of Conservation Areas is recognised by Draft Policy 43. Para 5.3.2 in the supporting text of Draft Policy 73 also explains that existing additional level of protection are afforded to trees in CAs.</p> <p>Where the felling of protected trees in CAs are allowed to proceed through Section 211 notices, the Council’s Tree officer assesses whether they are TPO worthy. Where this cannot be justified, tree works cannot be objected to.</p>	No Modification.

184_1	Dr Judith John, Orpington Field Club	Under para 2 insert “ <i>ancient trees</i> ” as per London Plan Policy 7.21, supporting text 7.64.	<p>It is proposed to insert a sentence in the introduction to Section 5.3 Nature Conservation and Development, end of para. 2, which will set out the role of the Biodiversity Plan, which lists species and habitats of the borough which it is desirable to preserve and enhance, including ancient trees, as follows:</p> <p>[...]. <i>Wherever possible, the sympathetic management of such habitats will be encouraged through planning conditions, obligations or voluntary agreements. “The Bromley Biodiversity Plan (2015) translates the Borough’s biodiversity duty as set out in the NERC and carried over to national and regional biodiversity strategies to the context of Bromley. The Strategy promotes the conservation enhancement and protection of biodiverse spaces and identifies the protected and priority species and habitats of notes in Bromley.”</i></p>	<p><u>Minor Modification to the introduction to Section 5.3 Nature Conservation and Development.</u></p>
98_1	Ishpi Blatchley	<p>Instead of the reference to ‘native trees/shrubs’ when assessing what should be planted on development sites etc. it should be to ‘native trees of local provenance’. A case in point - English oak <i>Quercus robur</i> is a native tree which could just as easily be sourced from continental stock as from UK stock. However, it is possible that the eggs, larvae or chrysalis of pests could be introduced to this country with these continental (albeit ‘native’) trees. For example, it is highly likely that the Oak Processionary Moth was introduced into the Bromley area by this means – and it has cost LBB and the Forestry Commission untold amounts of money in their efforts to control this pest.</p>	<p>Local site factors should be the main influence on species selection and dictates whether the trees species required by the Council when planting is involved should be native or of local provenance.</p> <p>Amend the last line of Draft Policy 73 <i>Development and Trees</i> as follows: <i>“When trees have to be felled, the Council will seek suitable replanting of native species”.</i></p> <p>Add a sentence to para 5.3.3 to the supporting text of Draft Policy 73: <u>Where new trees are planted native species and local provenance will be sought as appropriate.</u></p> <p>End of para 5.3.6 Draft Policy 74 <i>Conservation and Management of Trees and Woodlands</i>.</p> <p><i>The Council will make use of planning conditions and obligations to achieve new planting of suitable tree species, native and/or of local provenance as appropriate,</i> through the planning process.</p> <p>Add to supporting text through the addition of a new line to para 5.1.8 of the Draft Policy 43 <i>Trees in Conservation Areas</i>: <i>“When consent is given for a tree to be felled, an appropriate replacement will usually be</i></p>	<p><u>Minor Modification to Draft Policy 73 and its supporting text.</u></p> <p><u>Minor Modification to the supporting text of Draft Policy 74.</u></p> <p><u>Minor Modification to the supporting text of Draft Policy 43.</u></p>

			<i>required as a condition of that consent. <u>Native species and local provenance will be sought as appropriate</u>".</i>	
Draft Policy 68 - Development and SSSI				
59_43	Matthew Frith, London Wildlife Trust	Supports.	Support welcomed.	No modification
Draft Policy 69 - Development and Nature Conservation Sites				
59_44	Matthew Frith, London Wildlife Trust	Support, but recommend it should more properly aligned to the statement as set out for Draft Policy 68 as the principles are similar. Amend as follows: "A development proposal that may significantly affect the nature conservation interest or value of a Local Nature Reserve (LNR), Site of Importance for Nature Conservation (SINC) or a Regionally Important Geological Site (RIG) will be permitted only not be permitted unless :"	Policy 68 relates to a designation which applies to a relatively small number of sites which are defined outside the Local Plan process and may change during the life of a plan. The national policy, like AONBS is that is development is not permitted. The sites which are dealt with under this policy are numerous and in most cases covered by other restrictive open space policies. They are identified in order that the particular interests are taken into consideration and where appropriate suitable amelioration actions can be included in any proposals associated with the land to minimise the effects.	No modification
64_2	Mark Harris Barton Willmore for Mr & Mrs Vansteenkiste	Proposes that "The Holdings" in Chelsfield site should be excluded from the SINC.	Although the consultee has registered a specific representation on the policy, the concern is over the designation of the land as a SINC, not the policy itself. No objection is raised to the policy, its wording or the supporting text and no suggestions for changes are made.	No modification
73_1	Javier Rojo	SINC site by B125. Questions the extension to the SINC designation and upgrade from Grade II to Grade I.	Although the consultee has registered a specific representation on the policy, the concern is over the designation of the land as a SINC, not the policy itself. No objection is raised to the policy, its wording or the supporting text and no suggestions for changes are made.	No modification
Draft Policy 70 – Wildlife features				
59_45	Matthew Frith, London Wildlife Trust	Support, but recommend strengthening by specific reference to the borough's nature conservation objectives by adding the following to the second bullet point: "... <u>to contribute towards the Bromley Biodiversity Action Plan.</u> "	Support welcomed. There is no reason why this suggestion could not be accommodated as it would not have any effect on the policy itself; it effectively adds a reason for the condition. Add "... <u>to contribute towards the Bromley Biodiversity Action Plan.</u> " to the end of the second bullet point in the	Minor Modification.

			policy.	
Draft Policy 71 - Additional Nature Conservation Sites				
59_46	Matthew Frith, London Wildlife Trust	Supports.	Support welcomed.	No modification.
Draft Policy 72 – Protected Species				
59_47	Matthew Frith, London Wildlife Trust	We support this policy. However, we recommend that reference is also made to the UK BAP Priority species which are of conservation importance in the UK, over 180 of which are found in Greater London. These are listed under Section 41 of the Natural Environment & Rural Communities Act 2006.	Propose adding to the supporting text of Draft Local Plan policy 72 <i>Protected Species: 5.3.1</i> [...]. <u>The UK Biodiversity Plan (1994) identifies priority species as a valuable ecological resource to be conserved. These are listed under Section 41 of the Natural Environment & Rural Communities Act 2006. These schedules are updated on a regular basis and local authorities are kept informed of any changes. In addition, the Biodiversity Plan identifies the Priority Species for Bromley including plant, fungi, bird and butterfly species of rare or threatened status. These should be taken into special consideration when development or change of use occurs and mitigation measures secured as above.</u> In addition, the Bromley Biodiversity Plan approved in 2015 sets out protected species in the Borough.	Minor modification to the supporting text.
Draft Policy 73 – Development and Trees				
59_48	Matthew Frith, London Wildlife Trust	Supports.	Support Noted.	No modification.
71_11	Tony Allen, The Chislehurst Society	<p>The policy is relevant to protection of trees in Conservation Areas but does not provide the protection required.</p> <p>There is no specific provision for safeguarding trees in conservation areas.</p> <p>In non-development situations the only protection against uncontrolled felling in CAs is under the s211Notice procedure (Town and Country Planning Act 1990), which allows for the making of a Tree Preservation Order.</p> <p>The Society is particularly concerned that the majority - nearly all - of s211 Notices submitted (of which there are now many) to fell or treat trees in conservation areas are allowed to proceed, even when there is little or no rationale for the proposed action.</p>	Response as above (143_6).	No modification.

Draft Policy 74 – Conservation and Management of Trees and Woodlands				
59_49	Matthew Frith, London Wildlife Trust	Supports.	Support noted.	No modification.
71_12	Tony Allen, The Chislehurst Society	<p>Relevant to protection of trees in Conservation Areas but do not provide protection required.</p> <p>There is no specific provision for safeguarding trees in conservation areas.</p> <p>In non-development situations the only protection against uncontrolled felling in CAs is under the s211 Notice procedure (Town and Country Planning Act 1990), which allows for the making of a Tree Preservation Order.</p> <p>The Society is particularly concerned that the majority - nearly all - of s211 Notices submitted (of which there are now many) to fell or treat trees in conservation areas are allowed to proceed, even when there is little or no rationale for the proposed action.</p>	Response as above (143_6).	No modification.
Draft Policy 75 – Hedgerows and Development				
59_50	Matthew Frith, London Wildlife Trust	Supports.	Support noted.	No modification.
193_14	Katharine Fletcher, Historic England	<p>The policy would benefit from clarity in terms of the considerations that will be taken into account for the retention of hedgerows. In particular, we recommend that the following is inserted: ‘...<u>the Council will normally expect the retention and beneficial management of any existing hedgerow, especially Ancient Hedgerows: where ...</u>’</p>	<p>The wording of the Draft Policy 75 <i>Hedgerows and Development</i> makes reference to the beneficial management of “<i>any existing hedgerow</i>”. The policy does therefore already cover the management of ancient hedgerows as well. Suggest adding to supporting text, para 5.3.7, “<i>The Council will resist the removal of significant hedgerows, particularly ancient hedgerows [...]</i>”.</p> <p>The following clarification could also be added to Para 5.3.8: “<i>In granting planning permission for new development where significant hedgerow, including ancient hedgerows</i>”...</p>	<p><u>Minor modification to the supporting text.</u></p> <p><u>Minor modification to the supporting text.</u></p>
Draft Policy 76 – Kent Downs AONB				
18_4	Katie Miller, Kent Downs AONB	Inclusion of an AONB policy welcomed but considered it would be better placed under the section headed Open and Natural Space.	It is not considered that any changes are necessary to the policy or the supporting text.	No modification

		<p>The policy should give greater clarity on how the AONB will be conserved and enhanced in accordance with the requirements of the Countryside and Rights of Way Act 2000 and para 115 of the NPPF.</p> <p>The AONBs include the landform, geology, biodiversity and historic and cultural heritage, as set out in the AONB Management Plans. The policy wording should be expanded to cover all these components. It is also important to acknowledge tranquillity as a quality of AONBs that requires conserving. The supporting text should include a description concerning the overall special characteristics and qualities of the AONBs.</p> <p>We welcome the reference to the Kent Downs AONB Management Plan. But want to see a reference to proposals being required to meet the requirements of Management Plan in the policy rather than the supporting text.</p> <p>There should also be a reference in the policy to the supporting guidance documents they have produced.</p>	<p>Many of elements making up the AONB mentioned, i.e. landform, geology, biodiversity and historic and cultural heritage, are covered by other policies in the Draft Local Plan.</p> <p>In any event, when appropriate, the council would consult Kent Downs AONB Unit on planning applications within the designated area (<i>there have only been less than 450 in the last 35 years</i>).</p>	
59_51	Matthew Frith, London Wildlife Trust	Supports.	Support welcomed.	No modification
Draft Policy 77 – Landscape Quality and Character				
59_52	Matthew Frith, London Wildlife Trust	Supports.	Support Welcomed.	No modification.
61_8	Kieran Wheeler, Savills for Bellway Homes	<p>(Maybrey Works) Policy should be more flexible to ensure deliverability is not compromised by on-site requirements or contributions.</p> <p>We note the proposed requirements for development to provide restoration and enhancement to the local landscape via contributions or conditions. These requirements should not impede the deliverability of development and render proposals unviable.</p> <p>We acknowledge the requirement for</p>	<p>The conditions set out in the NPPF for the use of planning obligations or conditions apply irrespective of whether they are referenced in Draft Policy 78 <i>Landscape Quality and Character</i>. Planning conditions will be sought where they meet the test set out in para 206, and planning obligations those set out in paras 203-205 of the National Planning Policy Framework. The impact of planning conditions or obligations on the viability of development will be a key consideration in judging whether these are appropriate in accordance with paras 173 and 176 of the NPPF. Draft Planning Policy 125 <i>Delivery and Implementation of the Local</i></p>	No modification.

		<p>development to make appropriate S106 contributions where appropriate. We would emphasise that planning contributions should meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations (2010) and, in line with NPPF paragraph 173; the viability of schemes should be considered carefully.</p> <p>In terms of using planning conditions, these should only be used in accordance with paragraph 206 of the NPPF which sets out that conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.</p> <p>The policy should incorporate greater flexibility to ensure that the deliverability of sites is not compromised by on site requirements or via contributions.</p> <p>Financial viability should be referenced in the wording of the policy.</p> <p>The wording of the condition should be ensure that the use of conditions meets the tests set out in the NPPF.</p>	<p><i>Plan</i> adequately signposts where planning obligations, as opposed to planning conditions, will be sought.</p>	
Draft Policy 78 – Green Corridors				
59_53	Matthew Frith, London Wildlife Trust	We support this policy. We recommend that specific references to the NPPF's requirement for LPAs to establish ecological networks as well as the All London Green Grid are made in the supporting text.	Agreed. Suggest adding the following additional paragraph 5.3.14 to the supporting text of the Draft Policy 78 <i>Green Corridors: The Mayor's London All Green Grid SPG</i> and associated area framework for Downlands provides guidance on the implementation of the policy framework in the London Plan for a green infrastructure strategy for London. It is a key document for facilitating improvements to the network, including to the broad green corridors which it identifies.	No modification.
Draft Policy 79 – Biodiversity and Access to Nature				
184_2	Dr Judith John, Orpington Field Club	Add as a clause to the policy: ' <u>Promote the implementation of the Bromley Biodiversity Plan</u> '	The Bromley Biodiversity Plan identifies principles for the management of biodiversity in Bromley, signposts existing mechanisms for the conservation/management of biodiversity, identifies species and habitats of note in	No modification.

			Bromley and provides guidance for the conservation protection and enhancement of the borough's biodiverse spaces in which the Council plays a part alongside other stakeholders including volunteer groups, developers and landowners. As such it is adequately signposted in the supporting text of Draft policy 79 <i>Biodiversity and Access to Nature</i> .	
59_54	Matthew Frith, London Wildlife Trust	Supports.	Support Noted.	No modification.