

Bromley Proposed Submission Draft Local Plan consultation 2016

Summary of Responses June 2017

Part 4 - contents

Policies or site without any representations are highlighted (orange)

Section	Policy/ Site	Page no.
Chapter 6 – Working in Bromley		
Section 6.1	Business and employment	1
Policy 80	Strategic Economic Growth	1
Policy 81	Strategic Industrial Locations (SIL)	1
Policy 82	Locally Significant Industrial Sites (LSIS)	7
Policy 83	Non-Designated Employment Land	12
Policy 84	Business Improvement Areas (BIAs)	13
Policy 85	Office Clusters	15
Appendix 10.14	Office Clusters	
Policy 86	Office Uses Outside Town Centres (and Office Clusters)	14
Policy 87	Home Working	
Policy 88	Hotels	
Policy 89	Telecommunications Development	
Section 6.2	Town Centres	16
Policy 90	Bromley Town Centre Opportunity Area	16
Policy 91	Proposals for Main Town Centre Uses	17
Policy 92	Metropolitan & Major Town Centres	18
Policy 93	Bromley Shopping Centre (formally The Glades)	19
Policy 94	District Centres	19
Policy 95	Local centres	20
Policy 96	Neighbourhood Local Centres, Local Parades and Individual Shops	
Appendix 10.9	Town Centre Shopping Frontages	21
Policy 97	Change in Use of Upper Floors	
Policy 98	Restaurants, Pubs & Hot Food Takeaways	21
Policy 99	Residential Accommodation	
Policy 100	Markets	
Policy 101	Shopfronts and Security Shutters	
Policy 102	Advertisements	

Section 6.3	Biggin Hill SOLDC	23
Policy 103	Biggin Hill SOLDC	23
Appendix 10.10	Biggin Hill SOLDC Green Belt changes	30
Policy 104	Terminal Area	28
Policy 105	West Camp	28
Policy 106	South Camp	29
Policy 107	Land East of South Camp	29
Policy 108	East Camp	30
Policy 109	Airport Public Safety	
Policy 110	Noise sensitive Development in Biggin Hill	
Section 6.4	Crystal Palace SOLDC	32
Policy 111	Crystal Palace SOLDC	32
Chapter 7 Environmental challenges		
Policy 112	Planning for Sustainable Waste Management	42
Appendix 10.11	Waste Site Allocations	
Policy 113	Waste Management in New Development	
Policy 114	New Waste Management Facilities and Extensions and Alterations to Existing Sites	
Policy 115	Reducing Flood risk	42
Policy 116	Sustainable Urban Drainage Systems	43
Policy 117	Water and Wastewater Infrastructure Capacity	43
Policy 118	Contaminated Land	43
Policy 119	Noise Pollution	
Policy 120	Air Quality	
Policy 121	Ventilation and Odour Control	
Policy 122	Light Pollution	43
Policy 123	Sustainable Design and Construction	43
Policy 124	Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy	43
Chapter 8 - Delivery and Implementation		
Policy 125	Delivery and Implementation of the Local Plan	46
Chapter 9 – Glossary		

Section 9	Glossary	49
Appendix 10.12	Implementation and Monitoring Framework	50
Policies Map Sets		51

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

Chapter 6 - Working in Bromley. Section 6.1 – Business and Employment

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Policy 80 – Strategic Economic Growth				
57_3	Ben Read, Rapleys for Associated British Foods	General support for policy and focus on bringing forward adequate development capacity, coordination of public and private investment and delivery of enabling infrastructure. Policy should provide a definition of economic development consistent with NPPF.	<p>Support noted.</p> <p>It is not considered necessary to specifically define “economic development” in the Draft Local Plan. The Draft Local Plan contains a vision and objectives for Business, Employment and the Local Economy, as well as a policy platform for all key economic activities across the Borough, taking into account independent evidence and relevant high level policy, including the NPPF.</p>	No modification
69_4	Nick Ireland, GL Hearn for Milton MVi	The plan lacks an up to date objective assessment of future needs for employment floorspace required by NPPF. Para 6.1.2 of the Draft Plan notes the latest GLA projections for 25,000 additional jobs in the plan period. However, the Draft Plan lacks clarity on the Borough’s quantitative capacity to accommodate additional employment floorspace, with evidence pointing to an unmet need for office floorspace. The Council should give further consideration to potential of mixed use schemes in commercially attractive locations, such as Hewitts Farm, Orpington, to deliver additional office floorspace.	<p>The Draft Local Plan promotes certain areas for continued office use throughout the plan period, including Town Centres, Business Improvement Areas and Office Clusters. These locations demonstrate existing strong occupancy and a critical mass of units and floorspace to continue as sought-after destinations for businesses in the long term. Intensification through refurbishment and redevelopment is expected to occur in these locations during the plan period, in line with evolving trends in office working and the office economy generally.</p> <p>Non-designated sites will continue to perform a role in providing office accommodation across the Borough. In acknowledgement of this role, the Draft Local Plan will seek to protect non-designated office sites by way of Draft Policy 86: Office Uses Outside Town Centres and Office Clusters, which provides further criteria for consideration of proposals for change of use on these sites. Proposals for new office uses in the Green Belt will also be subject to this Draft Policy, as well as other policies including those relating to development in the Green Belt.</p>	No modification
Policy 81 – Strategic Industrial Locations				
55_1	Peter Keenan Peter	Policy is not sound, questions the robustness of	The Council has carried out planning for the Cray	No modification

	<p>Brett for Iain Allsop, Next Group</p>	<p>evidence justifying SIL area. London Plan identifies Bromley as a "restricted" borough for transfer of industrial land but this does not mean Bromley cannot have necessary evidence to properly understand need for different land uses and extent of SIL boundary. Definition of boundary appears to be based on URS 2014 report "Planning for Growth in Bromley: Cray Business Corridor Study". URS study recognises there will be reduction in industrial floorspace across the Borough, but not within SIL as this area displays good strategic characteristics. However, this was a snapshot in time around 2014.</p> <p>URS study also recommends Council redefine boundary to exclude large retail units in north eastern cluster. However, SIL still includes large retail units elsewhere, including Sports Direct and TK Maxx, demonstrating inconsistency.</p> <p>URS study identifies phasing over development within 5-10 years for central west cluster, saying there is no obvious opportunity and there are no voids, due to quality of accommodation. May not be the case as there are concerns over viability of accommodation by occupiers, with several buildings in the cluster significantly dated, not suitable for modern occupiers.</p> <p>Not clear how policy applies to retail uses. Wording for</p>	<p>Business Corridor Strategic Industrial Location (SIL) in accordance with a series of key metrics, including:</p> <ul style="list-style-type: none"> • Borough-wide plan period requirement for industrial and warehouse floorspace, as outlined in the Retail, Office, Industry and Leisure Study (2012), prepared for the Council by DTZ; • Industrial Land Release Benchmarks per annum and for the plan period, as outlined in the Mayor's Land for Industry and Transport SPG (2012); and • site specific guidance for defining the SIL boundary, as outlined in the Planning for Growth - Cray Valley Corridor Study (2014), prepared for the Council by URS. <p>The DTZ Report identified a requirement of industrial and warehouse floorspace across the Borough of -12,700 sqm until 2031 (including Class B1b, B1c, B2 and B8 uses, as well as non-B uses requiring B use sites), using a baseline year of 2006. Since this baseline year, the Council has recorded a substantial loss of industrial and warehouse floorspace across the Borough.</p> <p>The Mayor's SPG assigns an indicative benchmark for transfer of industrial land of -9 hectares between 2011 and 2031 and an annual benchmark of -0.5 hectares for this period. Since 2011, over 3 hectares of land in the Borough was transferred from industrial to other land uses by change of use permissions. Annual transfer of industrial land to non-industrial use since 2011 has so far exceeded the annual benchmark.</p> <p>The 2014 URS Report considered the requirement against locational elements of the Cray Business Corridor to provide recommendations to how the SIL should be defined. The Council considered these recommendations to be sufficiently current to apply for the plan period.</p> <p>There is an identified role for Class B uses which</p>	
--	--	--	---	--

		display and sales is assumed to refer to retail uses but not clear. London Plan has similar wording, but document is from 2011 and currently under review. Way in which retail and Class B uses interact is blurring. Retail units often have dual role of retail outlet and facility for online order. Possible for retail uses to facilitate increased Class B uses. Local Plan needs to balance land uses across Borough and there are significant retail needs not currently being met. Plan does not set out strategy for how needs will be met in full.	incorporate an element of ancillary sales and display within designated industrial areas. There should be a clear distinction between these uses and retail establishments under Use Class A. The Council will ensure that such proposals demonstrate that the use as a whole falls within Class B.	
63_2	Jonathan Best, Montagu Evans for Travis Perkins	<p>Suggests para 2 of the policy be amended to refer to sites where other uses are already in existence or are permitted.</p> <p>Para 2 policy is unclear. First and second sentences appear contradictory, by stating that proposals should seek to provide Class B operations but also allowing for non-Class B uses. References to display and sales appear to relate to retail, which should be subject of other policies. Suggests that on sites with other uses in existence or permitted, policy should encourage B1b/c, B2 and B8 uses, allow for other employment generating uses that reinforce the role of the SIL and refer to other additional policies for Town Centre uses. Para 6.1.15 should be updated in a related form.</p>	<p>There is an identified role for Class B uses with ancillary sales and display elements within designated industrial areas. However, there should be a clear distinction between these uses and retail establishments under Use Class A. The Council will aim to maintain this distinction by requiring that proposals demonstrate that the use as a whole falls within Class B. For this reason, this policy can operate in tandem with Town Centres policies relating to retail uses.</p> <p>Para 2 is intended to apply where existing non-Class B uses are already in operation and should not be extended to include sites only with planning permissions for these uses. However, it is acknowledged that the para can be further clarified, without altering the policy's intent.</p> <p>Recommend amending para 2 of the Draft Policy as follows: <i>“Notwithstanding the above uses, <u>proposals on sites in the SIL where non-Class B operations are already in existence, proposals should seek to provide Class B uses—operations. Proposals involving non-Class B uses on these sites should provide employment generating uses that reinforce the role of the SIL.</u></i> <i>(INSERT SPACE)</i> <i>Proposals <u>in the SIL for Class B uses that include involving a quantum of floorspace to be used for display and sales should demonstrate that this quantum of floorspace is these uses are clearly ancillary to the a primary Class B uses.</u>”</i></p>	<u>Minor modification</u>
44_2	Stephanie O'Callaghan,	Policy does not consider need to incentivise and fund	The Council considers sufficient capacity exists on	No modification

	Quod for Scotia Gas Networks	decommissioning of St Mary Cray gasholder site, as per London Plan Policy 5.22. Safeguarding of land for Class B uses would stymie future development in perpetuity, contrary to NPPF para 22. Suggests removal of site from SIL and allocated as "white land" within proposals map.	this site to reuse or redevelop for employment uses which reinforce the role of the SIL and its Industrial Business Park categorisation. Further, the Council has taken into account recent, independent advice outlined in the Planning for Growth - Cray Valley Corridor Study (2014), in defining the SIL boundary. This advice considered Borough-wide plan period need for employment floorspace, as well as locational elements of the Cray Business Corridor as a whole, and recommended the retention of the site and land adjoining it to the west along Leeson's Hill. The Council considers that the site, and the broader employment cluster on Leeson's Hill, will continue to play an integral role in promoting the SIL as the Borough's chief industrial location.	
124_1	Gillian Kavanagh, Savills on behalf of Legal & General	<p>Central House is located within SIL. Strategic role of the SIL is supported but site should be appropriate for alternative uses including residential. Site has a PTAL score of 3 and is approximately 320m from the St Mary Cray train station. There are no major constraints to redevelopment and the site could provide housing within the next five years.</p> <p>Policy is unsound as it does not promote sufficient flexibility. Considers that existing uses could be accommodated in Lower Sydenham LSIS, freeing up site for alternative uses.</p>	<p>Support for strategic role of SIL is noted.</p> <p>The Council considers sufficient capacity exists on this site for employment uses which reinforce the role of SIL and its Industrial Business Park categorisation. Further, the Council has taken into account recent, independent advice outlined in the 2014 Cray Valley Corridor Study. This advice recommended the retention of the site and land adjoining it to the east, north and west along Leeson's Hill. The Council does not agree that the site should be removed from the SIL and allocated for residential use.</p> <p>The Draft Policy wording promotes sufficient flexibility to further economic growth in the Cray Business Corridor, by enabling the Council to consider non-industrial uses, such as office or other employment generating uses that reinforce the role of the SIL, in certain locations in the Corridor. It also provides flexibility for considering the diversity of Class B uses, acknowledging that there is a role for Class B uses with ancillary product display or sales areas.</p>	No modification
57_4	Ben Read, Rapleys for Associated British Foods	Owners of Allied Bakeries Site. Bakery function ceased in 2014, however the site continues to be in operation as a distribution centre. Proposes to retain distribution centre, with a third of site used for alternative economic development, including retail. Recommends	The Council has carried out planning for the Cray Business Corridor Strategic Industrial Location (SIL) in accordance with a series of key metrics, as outlined in the comments against 55_1. The proposed designation takes into account these	No modification

		<p>site be allocated for economic development, including a new distribution centre. Want more flexibility in policy to allow alternative employment uses.</p> <p>Policy is currently unsound as it does not reflect NPPF and does not acknowledge needs of existing businesses. Location of site within Renewal Area suggests greater flexibility should be given to land use planning on this site to allow retail uses.</p>	<p>key metrics.</p> <p>As discussed in the comments against 124_1, the Draft Policy wording promotes sufficient flexibility to further economic growth in the Cray Business Corridor.</p>	
94_3	Clare Loops, London Borough of Bexley	<p>Supports approach regarding SIL, including Foots Cray-Ruxley Corner, and would welcome discussion on development in area that may affect Bexley. This includes Foots Cray Sustainable Growth Area.</p> <p>Unclear whether Crayfields Business Park would be de-designated from SIL or have a dual SIL/Office Cluster designation. Mindful of the current Government's approach regarding permitted development and presumes Bromley has considered appropriate measures.</p>	<p>Support noted.</p> <p>The Council considers that the Crayfield Business Park can possess a dual designation as a SIL (Industrial Business Park) and an Office Cluster and that both policy settings can successfully operate in tandem on this site. The area contains storage and distribution uses, in addition to the significant cluster of office uses, generally in conformity with the London Plan definition of Industrial Business Parks.</p> <p>The Council has introduced Article 4 Directions to remove PD within parts of Bromley Town Centre and will review the potential for use in the Office Clusters. This promotes sufficient flexibility for the growth of the Business Park and does not preclude the Council's consideration of other permitted uses that reinforce the role of the SIL in this area.</p>	No modification
108_1	Jen Sanders, Jones Lang LaSalle for Legal and General	<p>Regarding deliverability of employment provision when compared to evidenced requirement. Evidence demonstrates requirement for increase in employment space, although some of these documents are somewhat out of date. Local Plan para 6.1.2 identifies requirement for 25,000 additional jobs, based on GLA 2016 Labour Market Predictions. Plan does not state what this means in floorspace terms. Based on 9-12 sqm per job, additional 225,000-300,000sqm employment floorspace required to meet this growth. If lower density calculations used, even more floorspace required. Overall, likely to be in excess of 250,000 sqm.</p> <p>General tone of employment policies is for protection of existing land and floorspace, rather than exploration</p>	<p>The Council has carried out planning for the Cray Business Corridor Strategic Industrial Location (SIL) in accordance with a series of key metrics, as outlined in the comments against 55_1. The proposed designation takes into account these key metrics.</p> <p>The Council is satisfied that a sufficient proportion of the Borough's industrial land is designated to address identified need for the plan period. It envisages a degree of intensification of uses in designated areas, to reflect evolving industries and working patterns, and a retention of the bulk of non-designated sites to provide adequate capacity over the life of the plan. The Council does not agree that this land should be</p>	No Modification

		<p>of new sites. No supporting information provided on net amount of space/jobs each designated area could provide. Therefore, not possible to quantify extent to which this will address identified employment need. Only Biggin Hill and Business Improvement Areas quantify site specific new job projections. Estimated shortfall of 20,700 jobs/220,000 sqm floorspace. Therefore, Plan is not positively prepared, justified (showing no evidence of considering reasonable alternatives), effective or consistent with national policy.</p> <p>Council has not given adequate justification in refusing to de-designate Green Belt land in Crayfields to bolster SIL industrial land stock. Release of land between the Industrial Park and Business Park would follow similar land releases in the early 1980s and late 1990s for these areas, respectively. Demand for business land in the two employment areas has been consistent, showing a general need in the locality, but scope for intensification is limited.</p>	designated as SIL, nor does it consider that exceptional circumstances exist to remove the land from the Green Belt in order to allow a degree of growth commensurate with a SIL designation.	
17_1	Vanessa Evans, Kent Wildlife Trust	<p>Concerns about proposed designations for Cray Business Corridor SIL including Crayfield Business Park Office Cluster. Land is adjacent to Kent Wildlife Trust reserve and Ruxley Gravel Pits Site of Special Scientific Interest, but no mention is made of these sites as significant environmental constraints. Needs to clarify that there must be no direct or indirect impact upon wildlife site, including bird population, by way of lighting, noise and general disturbance during construction and operation of businesses.</p> <p>Also likely to be an impact on hydrology, including increased runoff and water contamination.</p>	The Draft Local Plan promotes outcomes in the Cray Business Corridor that are consistent with sustainable development principles. The protection of sensitive receptors in the vicinity of the Cray Business Corridor is adequately covered elsewhere in planning policy (within the Draft Local Plan and in other relevant policy documents) and legislation. It is not necessary to duplicate these provisions in Draft Policy 81.	No modification
54_1	Steven Butterworth, NLP for Tesco	<p>Land rear of Edgington Way should be removed from SIL. Notes earlier officer comments on this site, that the format and location of the land is consistent with London Plan's description of Industrial Business Park land, but there is no consideration of site specific issues. The site is vacant, has failed to attract Class B and therefore plays no role in contributing to employment floorspace. Site specific issues prevent take-up including shared access with Tesco, Jaguar and bus facility, lack of road frontage and proximity to nature reserve.</p>	<p>The Council has carried out planning for the Cray Business Corridor Strategic Industrial Location (SIL) in accordance with a series of key metrics, as outlined in the comments against 55_1. The proposed designation takes into account these key metrics.</p> <p>The Council considers that the site will continue to perform an integral role in promoting growth in the SIL for the plan period. The site is comparatively unencumbered and its location is most suitable for</p>	No modification

		Currently a falling requirement and an oversupply in B1c/B2/B8 floorspace in the Borough. A review should be undertaken of Business Areas to ensure they continue to meet needs and avoid retention of sites in conflict with NPPF para 22. Should lead to some or all of Foots Cray-Ruxley Corner being de-designated. Area already supports a high concentration of non Class B uses including timber merchants, DIY trade counters and other Sui Generis.	uses falling under the Industrial Business Park categorisation. This is consistent with advice outlined in the 2014 Cray Valley Corridor study, as well as the NPPF and London Plan.	
51_3	Charles Murithi, Environment Agency	Riverside sites should protect, enhance and restore the River Cray where proposals border the watercourse, consistent with flood risk and other environmental considerations.	The representation refers to LSISs but is presumed to be in relation to the Cray Business Corridor Strategic Industrial Land. The Draft Local Plan promotes outcomes in the Cray Business Corridor that are consistent with sustainable development principles. However, the protection of sensitive receptors in the vicinity of the Cray Business Corridor is adequately covered elsewhere in planning policy (within the Draft Local Plan and in other relevant policy documents) and legislation. It is not necessary to duplicate these provisions in Draft Policy 81.	No modification
Policy 82 – Locally Significant Industrial Sites				
94_5	Clare Loops, London Borough of Bexley	Broadly supports but seeks clarity on proposed LSISs located in Green Belt. Unclear how the policy would work in practice on these sites.	Support noted. During the preparation of the Draft Policies and Designations in 2014, the Council commenced a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan, taking into account borough-wide plan period employment floorspace requirements and using locational criteria. The defined boundary for the Cray Business Corridor SIL will result in the de-designation of a considerable portion of land in the Corridor. Opportunities were identified in the review to designate new LSISs to mitigate this loss of designated land. Several sites in the Green Belt already containing industrial uses were selected on the basis of generally meeting these criteria and providing a value contribution towards the plan period requirements. The Draft Plan will continue to	No Modification

			support the existing industrial operations on these Green Belt sites in the long term. Future applications for industrial and other permitted uses will be considered against Draft Policy 82 and other policies including those relating to development in the Green Belt.	
47_1	Tim Rainbird, Quod for Industrial Property Investment Fund	Council proposes to designate entire Oakfield Road, Penge Business Area as Locally Significant Industrial Site (LSIS) and also extend this designation to include the Homebase unit. No justification is provided for the proposed change. The site has operated as a retail use since its consent in 1983. Proposed wording of Draft Policy is ineffective as part of the LSIS is already in non-Class B use.	<p>During the preparation of the Draft Policies and Designations in 2014, the Council commenced a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan, taking into account borough-wide plan period employment floorspace requirements and using locational criteria. Opportunities were identified in the review to designate additional land as LSIS where justified, to mitigate the loss of designated land elsewhere in the borough, particularly within the Cray Business Corridor.</p> <p>The northern boundary of the current UDP Business Area nearer to High Street has been extended to include 45 Oakfield Road. Whilst the site currently contains a retail warehouse use, its size and format lends itself to a closer relationship with the Business Area-designated land to the south, than with the primary shopping frontage uses along High Street to the east.</p> <p>The Draft Policy provides sufficient flexibility to allow the current use to operate and to present a range of reuse or redevelopment options consistent with the LSIS designation for the plan period. For these reasons, the proposed designation of the site within the LSIS is justified.</p>	No modification
78_2	Robert McQuillan, Robinson Escott Planning on behalf of Bromley Business Centre	<p>Seeks amendment to Local Plan to exclude Enterprise House, Bromley Common from proposed Locally Significant Industrial Site designation. Site has first class access and is generally sustainable, located in A21.</p> <p>Appropriate to maximise potential of the site by retaining commercial ground floor space and achieving residential use above to help Borough's housing need. Draft Policy should be expanded to include reference to opportunities for mixed use to provide modern Class</p>	<p>As the comments against 47_1 state, the Council carried out a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan. This is consistent with the London Plan's strategy for boroughs to plan, monitor and manage designated industrial areas, through the preparation and administration of Local Development Frameworks.</p> <p>As outlined in the Council's Industrial Land and</p>	No modification

		B floorspace with housing.	Premises Update 2015, the land at Enterprise House, Hastings Road scored favourably against the locational criteria, providing a variety of Class B units and a valuable contribution of employment land in Bromley Common. At the time of preparation of the Proposed Submission Draft Local Plan in 2016, the site continued to show strong occupancy. Omission of this site from proposed designations is not supported.	
90_2	John Escott, Robinson Escott Planning on behalf of Lansdown Asset Management	<p>Seeks amendment to Local Plan to exclude 38 Croydon Road, Beckenham from Elmers End proposed Locally Significant Industrial Site (LSIS). Land is in a highly sustainable and accessible location. West of site is Tesco Superstore and petrol station and east of site is predominantly residential. Buildings on site have been vacant for several years with little or no commercial interest.</p> <p>Draft Policy does not encourage mixed use in suitable locations to meet housing needs.</p>	<p>As the comments against 47_1 state, the Council carried out a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan. This is consistent with the London Plan's strategy for boroughs to plan, monitor and manage industrial land designations, through the preparation and administration of Local Development Frameworks.</p> <p>As outlined in the Council's Industrial Land and Premises Update 2015, Elmers End (identified as a Business Area in the UDP), scored favourably against the locational criteria, providing one of the largest clusters of industrial and Class B units in the Borough, outside the Cray Business Corridor. Whilst the site has a recent permitted development approval to convert its office use to residential, there remains potential for a return to a Class B use, should this permission lapse. The Draft Policy provides sufficient flexibility for the reuse or redevelopment of the site for compatible employment uses in the long term. Omission of this site from proposed designations is not supported.</p>	No modification
95_1	Diana Thomson, Savills for Legal and General Property Partners	Requests that Bromley Industrial Centre is removed from proposed Locally Significant Industrial Site (LSIS) at Waldo Road, Bromley. Site contains two buildings occupied by joinery and construction supply businesses. Supports strategic role of LSIS but considers site is more appropriate for alternative uses including residential. Site is within a predominantly residential area, supported by good transport links, community facilities and retail provision, is free of environmental constraints and is separated from other neighbouring industrial premises. Continued provision	<p>Support for strategic role of LSIS is noted.</p> <p>As the comments against 47_1 state, the Council carried out a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan. This is consistent with the London Plan's strategy for boroughs to plan, monitor and manage industrial land designations, through the preparation and administration of Local Development Frameworks.</p>	No modification

		<p>of industrial uses on the site comprise conflicting uses not appropriate adjacent to residential.</p> <p>The Mayor's "A City for all Londoners" advises in some areas, industrial land may be surplus to current needs and could be better used for housing. Council's evidence base identifies Lower Sydenham proposed LSIS as having the only concentration of poor quality stock in the Borough and recommends seeking opportunities for infill/redevelopment. Employment uses on the site could be accommodated within Lower Sydenham LSIS, allowing redevelopment of the site for alternative uses.</p>	<p>As outlined in the Council's Industrial Land and Premises Update 2015, the land at Waldo Road scored favourably against the locational criteria, providing a significant cluster of high quality Class B units, with good connectivity to Bromley Town. At the time of preparation of the Proposed Submission Draft Local Plan in 2016, the site continued to show strong occupancy. Omission of this site from proposed designations is not supported.</p>	
123_1	Gillian Kavanagh, Savills on behalf of Legal & General	<p>Requests that Sydenham Industrial Estate is removed from proposed Locally Significant Industrial Site (LSIS) at Lower Sydenham. Site contains nine industrial units. Lower Sydenham train station is adjacent to site at northeast corner, while there are several bus services in close proximity. Supports strategic role of LSIS but considers site is more appropriate for alternative uses including residential. Site is a brownfield site in accessible location and separated from other industrial uses.</p> <p>The Mayor's "A City for all Londoners" advises in some areas, industrial land may be surplus to current needs and could be better used for housing". Council's evidence base identifies Lower Sydenham proposed LSIS as having the only concentration of poor quality stock in the Borough and recommends seeking opportunities for infill/redevelopment. Employment uses on the site could be accommodated elsewhere in Lower Sydenham LSIS, allowing redevelopment of the site for alternative uses.</p>	<p>Support for strategic role of LSIS is noted.</p> <p>As the comments against 47_1 state, the Council carried out a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan. This is consistent with the London Plan's strategy for boroughs to plan, monitor and manage industrial land designations, through the preparation and administration of Local Development Frameworks.</p> <p>As outlined in the Council's Industrial Land and Premises Update 2015, Lower Sydenham (identified as a Business Area in the UDP), scored favourably against the locational criteria, providing the largest cluster of industrial units in the Borough, outside the Cray Business Corridor. Only one amendment is proposed to the designated area boundary, which is to omit the recently redeveloped former Dylon International site on Worsley Bridge Road. The remainder of the area shows good potential for ongoing industrial and compatible business use, providing a variety of Class B units, with strong transport connectivity and reasonable occupancy. The site plays a critical role in shaping this cluster. De-designation of the site is not supported.</p>	No modification
61_9	Kieran Wheeler, Savills for Bellway Homes	<p>Draft Policy allows flexibility to include alternative uses, consistent with NPPF para 22, however more flexibility could be incorporated. Supports inclusion of office uses in Draft Policy, allowing for flexibility and better</p>	<p>Draft Policy 82 reflects strategic level policy documents, such as the NPPF and London Plan, as well as independently identified plan period floorspace requirements. It provides an</p>	No modification

		<p>occupancy. Welcomes inclusion of Class B1b and B1c, will assist in finding appropriate end users. Overall Policy should be more flexible to reflect NPPF para 22.</p> <p>Labelling of sub-points should be clearer to avoid confusion between Draft Policy paras.</p> <p>Supports reference to potential Class B uses in part a). Considers marketing requirement to be overly onerous, inconsistent with NPPF para 22 and should be removed.</p> <p>Part b) should not solely focus on quantitative aspect, but should acknowledge qualitative improvements renewed or replaced Class B floorspace could generate. Improvements to employment numbers and floorspace quality / condition are beneficial.</p> <p>Supports part c) emphasis on Class B uses</p> <p>Supports part d) wording which is considered flexible</p> <p>Supporting para 6.1.17 has greater flexibility, but should add further detail about mixed use development including residential, where appropriately located and acknowledging these as "enabling uses"</p>	<p>appropriate degree of flexibility, whilst seeking to protect the designated areas as a whole from being adversely impacted by new developments or changes of use. Any further expansion of the range of permitted uses, to include non-industrial uses such as town centre retail or residential, is not supported, as it could potentially undermine the long-term viability of the cluster.</p> <p>The labelling of sub-points in the Draft Policy is consistent with the format used elsewhere in the Draft Local Plan.</p> <p>The marketing requirements outlined in the Draft Policy and Supporting Text are consistent with guidance provided in the Mayor's Land for Industry and Transport SPG (2012). The Council considers these requirements critical to determining the medium to long-term sustainability of an existing permitted use of a site.</p> <p>The Draft Policy seeks to ensure that a similar quantum is provided in a redevelopment proposal to ensure sufficient flexibility for a range of potential Class B uses to locate at the site in the medium to long term. However, it also avoids being over-prescriptive in this requirement through not specifying an exact amount or proportion of floorspace that should be provided in these proposals. In this regard, the Draft Policy strikes an appropriate balance between encouraging redevelopment and reuse of land in the LSIS and protecting the employment potential of this land for the plan period.</p> <p>Support is noted.</p> <p>Support is noted.</p> <p>The Supporting Text is intended to elaborate on acceptable outcomes pursuant to the Draft Policy, in particular paragraph 2 (i.e. the outcomes should demonstrate how they meet each of the requirements labelled a to d equally). It should not promote outcomes that may contradict the intent</p>	
--	--	---	--	--

		<p>Supporting para 6.1.18 reference to ancillary retail uses adds flexibility. Suggests adding reference to ancillary retail uses that meet needs of "enabling uses" such as residential</p> <p>Suggests that Maybrey Works is no longer consistent with wider Locally Significant Industrial Site designation and should be excluded. Draft Policy should note the Mayor's "A City for all Londoners" which advises in some areas, industrial land may be surplus to current needs and could be better used for housing.</p>	<p>of the Draft Policy or other sections of the Draft Local Plan. The suggested text is not supported.</p> <p>As explained in the previous comment, the Supported Text is intended to elaborate on acceptable outcomes pursuant to the Draft Policy. It should avoid promoting a range of outcomes that may not adequately meet each of the requirements set out in paragraph 2 of the Draft Policy.</p> <p>As the comments against 47_1 state, the Council carried out a review of existing designated and non-designated industrial sites for potential designation as LSIS under the Draft Local Plan. This is consistent with the London Plan's strategy for boroughs to plan, monitor and manage industrial land designations, through the preparation and administration of Local Development Frameworks.</p> <p>Lower Sydenham scored favourably in the Council's review of industrial sites (see also comments against 123_1). The site contributes a variety of affordable business units to the overall Lower Sydenham cluster. A majority of these units were occupied as recently as 2015 for a range of Class B1, B2 and sui generis industrial purposes, which suggests there remains potential for reuse of the site in the medium to long term. De-designation of the site is not supported.</p>	
Policy 83 – Non-Designated Employment Land				
110_1	John Escott, Robinson Escott Planning	Draft Policy should be reworded to accord with NPPF para 22. Some existing employment sites are inherently unsuitable for continued employment use due to location, access, impact of neighbours etc. Criterion b) would seem unnecessary in that it merely duplicates what is essentially set out in Criterion a).	In preparing the Proposed Submission Draft Local Plan, the Council reviewed the wording of policies for non-designated employment land, to determine an adequate level of scrutiny to apply to change of use proposals on these sites. This review took into account strategic level policy documents, such as the NPPF and London Plan, as well as independently identified plan period floorspace requirements. The proposed wording clarifies how redevelopment proposals can be considered, but is not overly prescriptive in providing this clarity.	<u>Minor modifications</u>

			<p>It is agreed that the requirements under para 3 could be clarified without changing the Draft Policy's intent. However, criteria a. and b. are not considered duplications, as they require consideration of both the market interest in a site <i>and</i> evidence that the applicant has considered all potential reconfigurations of the site for employment generating uses.</p> <p>Recommend amending para 3 of the Draft Policy as follows: <i>"Proposals for change of use of non-designated sites accommodating Class B uses to a non-employment generating use will be considered on the following criteria:</i></p> <ul style="list-style-type: none"> <i>a. whether there is a demonstrated lack of demand for the existing <u>permitted uses</u> or any potential alternative employment generating use including evidence of recent, active marketing of the site for reuse or redevelopment undertaken prior to the submission of a planning application over a minimum period of six months,</i> <i>b. whether all opportunities for re-let and sale for <u>reuse or redevelopment</u> for employment <u>generating uses</u> have been fully explored, both in terms of existing and any alternative employment generating uses and layouts, including small/more flexible business units, and</i> <i>c. where the site is capable of accommodating a mixed use scheme, whether the proposal includes the re-provision of a similar quantum of floorspace for employment generating uses, that is flexibly designed to allow for refurbishment for a range of employment uses.</i> 	
Policy 84 – Business Improvement Areas				
86_2	Will Edmonds, Montagu Evans for Taylor Wimpey	The map of Business Improvement Areas (BIA) identifies Bromley North as a BIA, which does not align with the adopted Bromley Town Centre Area Action Plan (AAP).	Under the Draft Local Plan, the Council proposes to include land at Bromley North as a new BIA, in addition to BIAs contained in the Bromley Town Centre AAP, at London Road (unchanged) and Bromley South (expanded to include further land	No modification

			to the south). This reflects the value of each area in providing capacity to accommodate identified office floorspace need for the plan period.	
160_3	Chris Burton	Unclear how Bromley North BIA will accommodate both office and allocated housing on same site.	Whilst land in the vicinity of Bromley North station is proposed as a site allocation under the Draft Local Plan, the Bromley North BIA encompasses a larger area, including the allocation site as well as land further to the east of the site allocation site along Tweedy Road. Residential uses identified in Appendix 10.2 will occur specifically within the allocation site, whilst office uses will continue to be promoted across the BIA generally.	No modification
Policy 86 – Office uses outside of Town Centres and Office Clusters				
61_10	Kieran Wheeler, Savills for Bellway Homes	<p>Policy does not recognise the importance of office uses in helping to deliver regeneration objectives and create successful mixed use developments. Should promote commercial uses (of an appropriate scale) within residential developments outside designated centres.</p> <p>Viability should be considered within the wording of the policy.</p>	<p>The intent of para 3 of the Draft Policy is to encourage retention of Class B1a stock outside of Town Centres and Office Clusters, which provides a valuable contribution to the overall floorspace capacity of the borough, for the life of the Local Plan. Viability of an out-of-centre/cluster site for the continued accommodation of office uses is factored into this paragraph. This includes viability of all potential redevelopment options that reprovide the Class B1a use as part of a mixed use scheme.</p> <p>Where it has been demonstrated that the site cannot continue to accommodate a Class B1a use, but the site is capable of accommodating a mixed use scheme, para 3 b. seeks the reprovision of a sufficient quantum of floorspace for other employment generating uses.</p>	No modification
69_5	Nick Ireland, GL Hearn for Milton MVi	<p>Draft Local Plan is not clear what the quantitative need for new office floorspace is. Lack of clarity on what provision is made for new office floorspace within the strategic priority areas for economic growth and capacity of SIL/LSIS sites to accommodate additional office and wider employment development.</p> <p>Draft Policy seeks to restrict the release of purpose-built large offices outside of existing town centres and office clusters. In the context whereby the plan does not appear to meet the quantitative need for office floorspace, this restriction is neither positively prepared nor justified.</p>	As outlined in the response to 69_4, the Draft Local Plan promotes certain areas for continued and, where appropriate, intensification of office use for the plan period. Non-designated sites will continue to perform a valuable role across the Borough, which is acknowledged in the wording of Draft Policy 86. It is expected that the SIL and LSIS areas will continue to accommodate an element of office floorspace for the duration of the plan. However, with the exception of the Crayfields Business Park, these areas are not suitable for further clustering of Class B1a uses.	No modification

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

Draft Policy 85: Office Clusters

DLP No.	Representor	Summary of Response	Officer Comment	Recommendation
Draft Policy 85 – Office Clusters				
23_5	Patrick Bloom	There should be nothing which puts undue pressure on existing infrastructure - water, sewage, transport, schools, affordable housing etc.	Where an application is submitted, either as a prior approval or as a full application, these will be subject to flooding, highways and transport issues, noise, and contamination. Applications are assessed on a case by case basis.	No modification.
30_6	Mr Hough, Sigma planning services for South East Living group	The Policy will lead to degradation of quality of office space. PD changes will not be prevented, and other uses such as residential may help viability. It is not consistent with national policy and there is distinct lack of evidence. Policy should be deleted as unsound or Cobden Court should be removed from Masons Hill Office Cluster designation.	The Council has introduced Article 4 Directions to remove PD within parts of Bromley Town Centre, and will review the potential for use in the Office Clusters, There is forecast growth in office and employment, and there is demand for office based activity onsite. Cobden Court is integral to the Masons Hill Office Cluster and its removal would have an impact on the integrity of the boundary.	No modification.
94_4	Clare Loops, London Borough of Bexley	Approach to plan for office floorspace is welcomed, and appropriate long term measures should be planned for regarding PD. Clarity should be provided as to whether Crayfields Business Park will be replaced with Office Cluster designation or whether the area will have a dual designation.	The SIL policy includes reference to Office Clusters to ensure that they can co-exist, and it is suitable for the site to have a dual designation.	No modification.

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

Section 6.2 – Town Centres

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 90 - Bromley Town Centre Opportunity Area				
66_4	Victoria Barrett NLP for LaSalle Investment Management	<p>Supports the early review of Bromley Town Centre Area Action Plan.</p> <p>Concern that the approach of amending some BTCAAP allocations as part of the Local Plan Process but deferring a thorough review could lead to piecemeal development in the town centre..</p> <p>The review should also identify appropriate sites for leisure development. As such, the second bullet point should be amended to explicitly promote leisure and entertainment uses. “identify further opportunities to optimise development capacity for residential, retail, offices, cultural, leisure and entertainment and other town centre uses”</p>	<p>Support noted</p> <p>Council decision in Sept 2015 to consolidate civic centre functions on the Civic Centre Site, provided the opportunity to revisit the site allocation in the new context.</p> <p>The Bromley Town Centre Area Action Plan review will immediately follow the Local Plan adoption and the context of OA has been reflected in the Local Plan to ensure a joined up approach.</p> <p>The policy states that the review will identify further opportunities to optimise development capacity for residential, retail, offices, cultural and other town centre uses” therefore leisure and entertainment uses will be included in the review as these are “town centre uses”</p>	No modification
125_6	Jennifer Peters, Greater London Authority	The Council’s commitment to progress an Opportunity Area Planning Framework for this area is welcomed. Paragraph 6.2.7 refers to draft policy 76 but should refer to draft policy 80.	Error noted	Minor modification to correct reference to DP 80 not 76.
181_7	Mr Peter Martin, Bromley Civic Society	Unsound because targets are unachievable with plan period. Development in Town Centre of this scale is contrary to para 69 of NPPF and an evidence base has not been produced to prove otherwise.	The London Plan identifies Bromley Town Centre as an opportunity area with an indicative employment capacity of 2000 and a minimum number of 2500 new homes. The Local Plan targets take into consideration the information available for the allocated sites and within the Area Action Plan. The housing trajectory	No modification

DLP no.	Representor	Summary of response	Officer comment	Recommendation
			<p>demonstrates the deliverability of the sites within the AAP and shows them as achievable within the plan period.</p> <p>The review of the Area Action Plan will provide further analysis and detail of the Opportunity Area status identified within the London Plan 2016.</p>	
Draft Policy 91 – Proposals for Main Town Centre Uses				
55_2	Peter Keenan Peter Brett for Iain Allsop, Next Group	<p>Policy 91 is not sound, the policy is not positively prepared in accordance with paragraphs 23, 161 and 182 of the NPPF</p> <p>Policy 91 does not properly address the requirements of paragraph 23 and 161 of the NPPF. The sixth bullet point under paragraph 23 of the NPPF states that <i>'it is important that needs for retail, office and other main town centre uses are met in full and are not compromised by limited site availability'</i>.</p> <p>Paragraph 161 states that local planning authorities should assess, inter alia, the following</p> <ul style="list-style-type: none"> <input type="checkbox"/> the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development; <input type="checkbox"/> the role and function of town centres and the relationship between them, including any trends in the performance of the centres; <input type="checkbox"/> the capacity of existing centres to accommodate new town centre development; and, <input type="checkbox"/> <p>deprivation which may benefit from planned remedial action.</p> <p>The Council have not undertaken this exercise. It</p>	<p>In 2011 the Council instructed DTZ to carry out an update to the 2004 and 2009 retail capacity studies to provide individual forecasts of retail capacity for Bromley Town Centre, Orpington Town Centre Beckenham, Penge, Petts Wood and West Wickham (District Town Centres) as well as the group of Local Centres (Biggin Hill, Chislehurst, Hayes, Locksbottom and Mottingham).</p> <p>In addition to forecasts of retail capacity the study also included;</p> <ul style="list-style-type: none"> • A qualitative assessment of the opportunities for leisure growth. • Identification of the potential for office development in the key town centres of Bromley and Orpington. • An assessment of the likely employment effects of office growth. • An update of the employment land study carried out for the Council by GVA Grimley in January 2010. <p>The report is one of many evidence base documents behind the proposed submission draft local plan. A copy of the report is available to view on the Council's website.</p>	No modification`

		<p>is inappropriate to defer the consideration of this important policy requirement to a policy document that addresses only one centre in the Borough. The 2012 DTZ report focuses on Bromley Town Centre</p> <p>The local plan has not set out a strategy to show how it will meet floorspace needs or balance land uses.</p> <p>In the absence of up to date evidence and policies to address retail needs, the draft plan is not sound.</p>		
66_5	Victoria Barrett NLP for LaSalle Investment Management	Supports the identification that the DTZ study will be subject to an early review – this is critical to ensure that the BTCAAP is based upon up to date evidence bae in accordance with the NPPF.	Noted	No modification
Draft Policy 92 – Metropolitan and Major Town Centres				
66_6	Victoria Barrett NLP for LaSalle Investment Management	<p>Amendments are needed to the policy to require a range of uses to be provided in Bromley Town Centre (as is required for Orpington Town Centre).</p> <p>BTCAAP should be referred to generally without the reference to the year as it is subject to an early review in 2017/18.</p> <p>Policy is not positively prepared or consistent with national policy as it does not reflect the changing nature of retailing including the wider definition of town centre uses in the NPPF or customer demand. Flexibility is essential to the future of the town centre. The policy should be amended to be supportive of diversification and consolidation of retail floorspace in the town centres especially where units are vacant. For the policy to be sound an additional criteria should be added to require the Council to assess evidence on the demand for retail floorspace and floorspace for other main town uses when making decisions on</p>	<p>The London Plan identifies Bromley Town Centre as an Opportunity Area and Metropolitan Centre – these roles cover a wide “range of uses”</p> <p>The policy seeks to avoid an inappropriate overconcentration i.e. those that have a negative impact on the centre. Therefore in some instances clusters may be acceptable.</p>	No modification

		changes of use away from A1. A criterion should be added to require an assessment of positive and negative impacts upon town centres of creating or adding to clusters of similar activities in the town centre including the Glades.	The policy does not preclude a change of use away from A1 but the change of use must meet certain criterion in order to ensure that the proposal positive contributes to the role of the centre	
Draft Policy 93 – Bromley Shopping Centre (The Glades)				
66_7	Victoria Barrett NLP for LaSalle Investment Management	Not positively prepared. No justification for only permitting change of use from A1 if primary retail function not adversely affected. Out of date and fails to recognise consumer trends which include an increase in non retail uses. The NPPF clearly identifies main town centre uses (more than just retail). The policy should recognise these alternative uses in order to be consistent with national policy. Criteria should be inserted which requires the Council to assess evidence on demand for retail floorspace and floorspace for other main town centre uses when making decisions on changes of use away from A1. The supporting text refers to GOAD floorspace for Bromley Town Centre, this should be amended to reflect the floorspace within the Glades as the policy relates only to the Glades.	Supporting text – 6.2.18 - additional sentence to acknowledge that other main town centre uses can complement the function and that consumer trends are changing “ <u>The Council will seek to protect the primary retail function of the shopping centre. It is acknowledged that other main town centre uses can complement the function of the centre and reflect the change in consumer trends therefore may be permitted provided they don’t adversely affect the function of the centre</u> ” Agree – floorspace in this policy should relate only to the Glades (figure to be provided) “ The latest GOAD report provides around 1,293,500 sq ft of retail floorspace to be replaced with “The Glades accommodates x retail units providing y sq feet of retail floorspace	Minor modification to supporting text. Amend floorspace figure to relate only to the Glades Minor modification to supporting text
Draft Policy 94 – District centres, para 6.2.20				
111_3	Francis Bernstein	Commentary on Crystal Place needs rewording The commentary is too vague and does not indicate the unique mix of shops in Crystal Palace.	It is not appropriate to add this into the supporting text. This section does not describe each of the centres.	No modification

		Recommend changing the wording to include; “Crystal Palace District centre is characterised by a high proportion of independent stores, narrow high streets sections, significant high levels of traffic and pollution and parking stress, and has restricted parking areas for large lorries to service all of its primary shop frontages”		
Draft Policy 95 – Local Centres				
71_16	Tony Allen, The Chislehurst Society	Appears to provide protection to Chislehurst High Street – however PD allows for many changes of use. Article 4 should be prepared.	<p>Introducing an Article 4 on the whole of Chislehurst High Street would be contrary to the NPPF (in particular paras 6, 7 & 14 – presumption in favour of Sustainable Development)</p> <p>It is noted that under the Town and Country Planning (General Permitted Development Order) 2015, many changes of use can be carried out under “permitted development”. However, the Council considers all of its shopping frontages listed in Appendix 10.9 as Key Shopping areas. The London Plan further supports this by its interpretation of ‘key shopping areas’ as meaning those parts of town centres defined in Local Plans as primary shopping areas, primary and secondary frontages, and neighbourhood and more local centres. Therefore, the following changes of use proposed under the GDPO must apply to the Council for prior approval.</p> <p><i>Class J – retail or betting office or pay day loan shop to assembly and leisure</i> <i>Class M – retail or betting office or pay day loan shop to dwellinghouses</i> <i>Class C – retail, betting office or pay day loan shop or casino to restaurant or cafe</i></p> <p>The impact on the sustainability of the key shopping area will be taken into consideration. If it is undesirable to change the use of the building</p>	No modification

			because of the impact on the sustainability of the key shopping area then the development is not permitted under the GDPO. (Nb there are also many other conditions that the change of use must meet in order to be considered permitted development)	
Appendix 10.9 – shopping frontages				
71_17	Tony Allen, The Chislehurst Society	Excludes retail outlets in Park Road Chislehurst (Nos. 21 and 31/32)	Appendix 10.9 relates to the shopping frontages. Units 21,31 & 32 are not considered an integral part of the frontage in Chislehurst high street but are still protected by Policy 96 as individual shops.	No modification
Draft Policy 98 – Restaurants, pubs and hot food takeaways				
66_8	Victoria Barrett NLP for LaSalle Investment Management	<p>Criterion (b) to avoid the concentration of food and drink establishments, is not consistent with national and regional policy and should be removed. It does not allow for the management of clusters having regard to their positive and negative impacts in line with the London Plan Policy 4.8g. The policy does not recognise the positive effects that food and drink establishments can have in promoting town centres and providing customer choice in line with the NPPF Para 23.</p> <p>Para 6.2.30 identifies secondary frontages as more appropriate for these uses – however restaurants should be encouraged in primary frontages.</p>	<p>The purpose of policy criterion (b) is not to avoid the concentration of such establishments but to avoid their over concentration i.e where it is considered that there are too many for the area due to negative cumulative impacts of the concentration of uses.</p> <p>To clarify this, suggested additional supporting text to explain that “over concentration of these uses related to where/when there would be negative impacts due to the unacceptable concentration of such uses. i.e. impact on vitality and viability, noise, fumes, traffic etc...</p>	Minor Modification to supporting text..
183_1	Mr Steve Simms, SSA Planning for Kentucky Fried Chicken Ltd	<p>The policy is not positively prepared or justified Policy does not provide clear indication of how a development proposal should be dealt with i.e. what might constitute an “over concentration of food and drink establishments”.</p> <p>The policy requires the “health and wellbeing of local residents” to be considered but the evidence does not demonstrate a link between</p>	<p>Policy 98 cross references Policy 26 Health and Well Being in the Supporting Communities chapter of the Local Plan. The objective of this section of the policy is to ensure that a decision maker considers the implications of proposals for health & wellbeing, and can justify their decision.</p> <p>Para 3.2.9 advises that “Where health and wellbeing impacts are apparent they will be</p>	No modification

		<p>concentration of food and drink establishments and adverse health and well being therefore the policy is not justified</p> <p>It is unclear how the policy can be monitored for effectiveness.</p>	<p>considered in light of national guidance and locally recognised health evidence, to assess the health impact on the community.”</p> <p>Approaches to address hot food takeaway proliferation, linked to adverse health & wellbeing outcomes, are set out in the “Takeaways Toolkit” (GLA 2012) and the NHS “London Healthy Urban Development Unit” 2013 good practice guide “Using the planning system to control hot food takeaways”. Para 3.2.9 (supporting communities) indicates that locally recognised health evidence will guide the decision making in respect of clause b). The impact of planning applications will relate to the nature and location of a proposal. Evidence relating to the impact of fast food outlets on healthy weight in Bromley has been presented to the Bromley Health and Wellbeing Board.</p> <p>The Governments Planning Practice Guidance (2014) sets out the range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, including how</p> <ul style="list-style-type: none"> • “the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area; opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices...)” [ID: 53-001-20140306] 	
--	--	---	---	--

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

Section 6.3 – Biggin Hill Strategic Outer London Development Centre

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 6.3 – Biggin Hill Strategic Outer London Development Centre				
184_3	Dr Judith John, Orpington Field Club	No reference has been made to the adjacent proposed World Heritage Site, Darwin's Landscape Laboratory (Tentative List Site), which is of international importance. Area immediately east of the proposed SOLDC is part of Darwin's 'Big Woods'. Partly protected by SINC designation, internationally important significance must be taken into account. Local Plan should be consistent with London Plan Policy 7.10, which states that Tentative List Sites should be evaluated so that their Outstanding Universal Value is not compromised.	Whilst there is no statutory requirement for the Local Plan to consider Tentative Listings, the Proposed Submission Draft Local Plan policies acknowledge and respond to the sensitivities of this area. No further amendments to the Green Belt are proposed on the eastern boundary of the SOLDC and development outcomes are sought that do not have an unacceptable adverse impact on adjoining land to the east.	No Modification
83_2	Matthew Spry NLP for Biggin Hill Airport Ltd	Non-conformity with London Plan, by failing to support SOLDC designation, allow for adequate development capacity or to effective positive change. Evidence base refers to wider economic trends, rather than focusing on "business aviation" trends. Failure to acknowledge change in operating hours as catalyst for growth. No explanation as to why higher growth would be contrary to sustainable development (NPPF para 14). Queries realism of Airport's investment opportunities without making appropriate inquiries. Objects to Local Plan assigning specific policies for each parcel, which will restrict flexibility.	The proposed set of policies contained in the Draft Local Plan responds adequately to the SOLDC designation identified under the London Plan. Taking into consideration independent advice on economic and Green Belt matters, the Draft Policies identify an adequate quantum of land for SOLDC designation and parcels of land to be released from the Green Belt, to promote a level of growth commensurate with the designation for the life of the Draft Plan. The Draft Policies also identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor's Town Centres SPG (including aviation and high tech industries, aviation college, hotel and information centre uses). In doing so, these policies provide a degree of flexibility for employment uses to grow, but also recognise identified strategic priorities and environmental and heritage constraints in and around the SOLDC.	No modification
193_15	Katharine Fletcher, Historic England	Historic significance and sensitivity of Biggin Hill raise heritage issues which should be discussed further. Welcomes reference to heritage assets in West Camp, but supporting text does not offer any more guidance about the historic environment. Given the nature of the assets, several of which are on Heritage at Risk	The Council considers that the draft policies under Section 5.1 Built Heritage, in addition to Draft Policy 105, provide a robust platform for consideration of matters of heritage significance in any planning applications made on the site. Further, the Supplementary Planning Guidance	No modification

		Register 2016, requests that the text sets out more detail as to the positive approach to these assets, in line with NPPF para 126. May draw upon information elsewhere, including the AECOM report.	<p>for the RAF Biggin Hill Conservation Area will continue to be a material consideration for applications made within the Conservation Area boundary.</p> <p>The Council is also conducting a more detailed design study for land in West Camp in a separate exercise to the Draft Local Plan and has been involved in ongoing dialogue with Historic England and other key stakeholders.</p> <p>The above will ensure appropriate outcomes on matters of heritage significance are achieved in the plan period.</p>	
70_1	Helen McIntosh, South East London Chamber of Commerce	Supports the development of the aviation college. Should the option of locating a college at West Camp not be available, requests that an alternative provision is made for the college in the vicinity of the SOLDC.	<p>Support noted.</p> <p>The drawing of the SOLDC boundary takes into account the need for land to accommodate a range of uses outlined in the Town Centres SPG, including an aviation academy, airport heritage centre and hotel/leisure hub of a scale appropriate to serve the airport and wider cluster. West Camp was identified as an optimal location for the aviation academy, benefiting from close proximity to airport infrastructure, whilst also making allowance for long term airside capacity and Green Belt principles. The Council is in discussion with owners of some of the land at West Camp to ensure that an aviation academy can be realised within the plan period, consistent with the SPG.</p>	No modification
21_1	Neal Thompson, Robinson Escott for Bromley College	<p>Supports allowance for a D1 use (aviation college) in the SOLDC.</p> <p>Concerns raised about deliverability of the college and Council's consideration of reasonable alternative sites. Draft Policies should be less prescriptive and include flexibility to ensure policy support for aviation college beyond confines of the SOLDC. Should the option of locating a college at West Camp not be available, requests that an alternative provision is made for the college in the vicinity of the SOLDC. Suggests potential allowance for aviation college to the north east of the SOLDC, in the vicinity of Milking Lane.</p>	<p>Support noted.</p> <p>As outlined in the comments against 70_1, the SOLDC boundary is defined to allow adequate land to accommodate an aviation academy. West Camp is considered an optimal location for an aviation academy. The Council is in discussion with the owners of some of the land at West Camp to ensure the academy can be delivered within the plan period.</p>	No modification
192_1	Mr & Mrs Haskey	Expansion of airport through removal of Green Belt areas is unacceptable. Removal of Green Belt to	The Council has reviewed development opportunities and Green Belt principles for the	No modification

		<p>expand highway just for airport use, removing vegetation from highway edge, is unacceptable.</p> <p>Airport expansion will cause unacceptable noise and pollution from increased traffic.</p>	<p>airport and its surrounds. Responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality. Servicing of Biggin Hill and its surrounds will be carried out in accordance with growth as it occurs during the plan period. Once the nature of any new development at Biggin Hill Airport is fully understood at planning application stage, the Council will be in a position to better understand traffic impacts and therefore what requirements are needed to improve capacity. The Council will also continue to investigate potential bus route improvements between Biggin Hill and other parts of the borough, in order to mitigate levels of traffic generated as a result of future growth at the airport, the neighbouring industrial area and surrounding community.</p>	
197_1	Marie Killip, Tandridge District Council	<p>Recognises rationale and economic argument for the proposal. Questions how much consideration has been given to impact upon Tandridge District, particularly in Tatsfield. Development is likely to impact on road network. Clarification needed on how these impacts have been assessed and the level of engagement that has taken place with Tatsfield Parish and Surrey County Highways to support the expansion.</p>	<p>Representations accepted as a late submission.</p> <p>The proposed SOLDC designation, amendments to the Green Belt and policy platform are informed by independent advice by consultants URS and later AECOM. The URS Planning for Growth Biggin Hill Study (2015) considered the potential growth scenario put forward by Biggin Hill Airport Limited and provided a transport assessment and recommendations. This assessment included current and potential traffic flows and public transport services to and from localities to the south of the SOLDC, as well as the remainder of the Borough. At a high level, the study did not identify tangible impacts on the road network to the south and no improvements to this network were recommended. The Draft Local Plan considers and responds to the recommendations provided.</p> <p>Taking into account this evidence base, the Council did not consider consultation with these offices to be necessary at this stage. However, there will be opportunities for further consultation as the nature of development in the SOLDC</p>	No modification

			becomes clearer at planning application stage.	
Policy 103 – Biggin Hill SOLDC				
39_9	Andrew Dorrian, Transport for London	Continued support for development of aviation and high tech industry and business infrastructure at Biggin Hill. In line with London Plan Policy 6.3 and 6.6, Draft Policy should include a statement that all proposals should be underpinned by a robust strategy to improve public transport access to the site.	Support noted. The Draft Local Plan has been prepared in accordance with London Plan policies for sustainable transport planning. Draft Policies under 4. Getting Around (Transport and Accessibility), in particular Draft Policy 31 Relieving Congestion, reflect this. The Council does not consider it necessary to duplicate the requirements established under 4. Getting Around (Transport and Accessibility) by including further statements specific to the Biggin Hill SOLDC.	No modification
70_2	Helen McIntosh, South East London Chamber of Commerce	National Planning Practice Guidance states that councils should work with aviation stakeholders to make significant contribution to economic growth. It states that airports can put forward mixed use development including aviation services and other uses. Clear need for an aviation college at Biggin Hill which must be in close proximity to the airport with access to taxiways etc. College building will need to accommodate a small jet and propeller plane. In light of this need, fully supports Draft Policy.	Consistent with guidance under the Mayor's Town Centres SPG, the Draft Local Plan makes allowance for an aviation college to be located within the Biggin Hill SOLDC. In addition to the Draft Plan's preparation, the Council is also undertaking a design exercise for West Camp, which is nominated under the Draft Plan as the optimal location in the SOLDC for an aviation college. The design exercise is being prepared on the Council's behalf by independent consultants and involves ongoing discussions with a range of key stakeholders. It will consider the typical needs of an aviation college, against the local setting of West Camp and the requirement under the Draft Plan that development does not impede the effective operation of aviation uses or reduce airside access or capacity.	No modification
83_3	Matthew Spry NLP for Biggin Hill Airport Ltd	Policy is negatively drafted, does not support appropriate growth as per NPPF para 21 and exerts unnecessary controls. Fails to include all operational and developable land in boundary, or explain why BHAL boundary was rejected.	As explained in the comments against 83_2, drafting of policies for Biggin Hill SOLDC take into account independent advice on economic and Green Belt matters, as well as the strategic advice for the SOLDC designation in London Plan and the Mayor's Town Centres SPG. The SOLDC boundary, first published in the 2014 Draft Policies and Designations consultation document, is defined to an extent by the airport's current operational areas, privately owned business land adjoining the airport (including West Camp and the proposed LSIS), the A233 and	No modification

			Churchill Way. Taking into consideration sensitive areas to the east of the airport, the Draft Local Plan seeks to contain development in East Camp to within the existing footprint. The proposed SOLDC boundary also reflects this and expanding the boundary to include additional land in close proximity to these sensitive receptors is not supported.	
125_7	Greater London Authority	Broad thrust of the policies is welcomed.	Support noted.	No modification
75_1	Keith Austin	<p>Objects to airport expansion. Earlier consultation process flawed.</p> <p>Economic grounds for the creation of 2,875 further jobs are unsound.</p>	<p>Consultation for the Proposed Submission Draft Local Plan was carried out between 14 November and 31 December 2016. This followed previous consultations for the Core Strategy Issues (2011), Options and Preferred Strategy (2013), Draft Policies and Designations (2014) and Draft Allocations, Further Policies and Designations (2015). Each stage of the Emerging Local Plan process identified Biggin Hill as a key economic driver of the Borough, consistent with its SOLDC designation in the London Plan, and sought the public's views on how a pathway to delivering on this status could be achieved in the most appropriate and sustainable manner. This consultation process has been supported by evidence provided by independent consultants on key planning matters. All issues raised during the process have been taken into account in the evidence base and considered by the Council in the preparation of the Draft Plan.</p> <p>URS and AECOM, independent consultants providing advice to the Council, have factored in all representations received to date, including submissions provided by Biggin Hill Airport Limited (BHAL). In 2015, AECOM considered a report prepared by consultants on BHAL's behalf, which outlined growth potential for the airport equating to 2,300 new jobs, for the plan period. AECOM considered this potential to be ambitious but established with reasonable methods. The Council took this advice into account when preparing the Draft Plan. Subsequent submissions have been received from BHAL which upwardly revised this growth potential. Further advice</p>	No modification

			provided by AECOM in 2016 found there was insufficient evidence available to justified further amendments to the Draft Plan to accommodate the most recent growth estimates provided by BHAL.	
59_56	Matthew Frith, London Wildlife Trust	Concerned about Green Belt release and impact on Darwin's Landscape Laboratory proposed World Heritage Site and Cudham Lodge Woods SINC. Site is listed in the Mayor's SPG and UK Government's Tentative List 2012-2022, so any planning application must take these into account. Needs to be specifically referenced in the Local Plan.	As outlined in the response to 184_3, whilst there is no statutory requirement for the Local Plan to consider Tentative Listings, the Proposed Submission Draft Local Plan policies acknowledge and respond to the sensitivities of this area.	No modification
182_2	David Evans	Objects to removal of Green Belt, due to traffic, pollution and noise impacts and the detrimental effects on Downe Village and Leaves Green areas.	As outlined in the response to 192_1, responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality.	No modification
4_1	Peter Daintree	Green Belt should be protected	As outlined in the response to 192_1, responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality.	No modification
Policy 104 – Terminal Area				
83_8	Matthew Spry NLP for Biggin Hill Airport Ltd	Policy is negatively drafted, does not support appropriate growth as per NPPF para 21 and exerts unnecessary controls. Provides policy "options" including alternative boundary and wording for Terminal Area	As discussed in the officer comments against 83_2, the Draft Policies for the SOLDC identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor's Town Centres SPG. The proposed policies add clarity and certainty for development in the SOLDC for the duration of the plan. The Terminal Area is identified as one of the key parcels in the SOLDC for promotion of aviation related uses and protection of airside access and capacity. Other uses identified in the Mayor's Town Centres SPG but not directly aviation related, or requiring airside access, are promoted elsewhere in the SOLDC.	No modification
Policy 105 – West Camp				
70_3	Helen McIntosh, South East London Chamber of Commerce	Supports inclusion of D1 use in West Camp (for an aviation college).	Support noted.	No modification

83_4	Matthew Spry NLP for Biggin Hill Airport Ltd	West Camp promoted as a key growth parcel for airport capacity, but constraints on this growth, including ownership and competition with other uses, are ignored. Provides policy “options” including alternative wording for West Camp.	<p>As outlined in the officer comments against 83_2, the Draft Policies for the SOLDC identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor’s Town Centres SPG. The proposed policies add clarity and certainty for development in the SOLDC for the duration of the plan.</p> <p>As the responses to 70_1, 21_1 and 71_2 mention, the Council is undertaking a separate design exercise for West Camp, involving a range of stakeholders. In addition to this exercise, discussions are ongoing with the owners of land at West Camp, to ensure that development within the parcel can occur in accordance with the Draft Local Plan and the Mayor’s SPG and within the life of the plan.</p>	No modification
Policy 106 – South Camp				
83_9	Matthew Spry NLP for Biggin Hill Airport Ltd	Policy is negatively drafted, does not support appropriate growth as per NPPF para 21 and exerts unnecessary controls. Provides policy “options” including alternative wording for South Camp	<p>As discussed in the officer comments against 83_2, the Draft Policies for the SOLDC identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor’s Town Centres SPG. The proposed policies add clarity and certainty for development in the SOLDC for the duration of the plan.</p> <p>South Camp is the primary location for aviation related uses in the SOLDC and benefits from existing non-Green Belt status. The Draft Policy permits a range of aviation and industrial functions relevant to the SOLDC, in acknowledgement of this. Reflecting planning history in the parcel, allowance is also made for a hotel use.</p>	No modification
Policy 107 – Land East of South Camp				
83_10	Matthew Spry NLP for Biggin Hill Airport Ltd	Policy is negatively drafted, does not support appropriate growth as per NPPF para 21 and exerts unnecessary controls. Provides policy “options” including alternative boundary and wording for East Camp, inclusive of Land East of South Camp.	As discussed in the officer comments against 83_2, the Draft Policies for the SOLDC identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor’s Town Centres SPG. The proposed policies add clarity and certainty for development in the SOLDC for the duration of the plan.	No modification

			The parcel is earmarked to accommodate further growth of the SOLDC, but the Draft Policy also acknowledges sensitive areas to the east. The wording strikes an appropriate balance between expansion of the airport footprint and protection of identified environmental values of its surrounds.	
Policy 108 – East Camp				
83_5	Matthew Spry NLP for Biggin Hill Airport Ltd	East Camp not sufficiently promoted as opportunity for early growth in airport capacity. Other parcels will rely on initial East Camp growth. Provides policy “options” including alternative boundary and wording for East Camp, inclusive of Land East of South Camp, and North of East Camp.	As discussed in the officer comments against 83_2, the Draft Policies for the SOLDC identify specific areas within the SOLDC boundary most suited for certain aviation and related development types, recognised by the Mayor’s Town Centres SPG. The proposed policies add clarity and certainty for development in the SOLDC for the duration of the plan. The Council has taken into account independent advice on economic and Green Belt matters and recommends that the release of East Camp from the Green Belt is not adequately justified. Wording of the Draft Policy reflects the limited capacity of East Camp for growth, acknowledging both the level of built form and activity already in the parcel and the proximity to sensitive receptors to the east.	No modification
185_1	Mary Aquilina	Concerns over potential loss of Green Belt with BHAL Boundary, particularly East Camp and its borders with Cudham Lodge woods. Concerned at recent woodland clearing in last two years. Need to safeguard countryside and keep protective buffers from commercial enterprises.	As outlined in the response to 192_1, responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality.	No modification
Appendix 10.10 – Biggin Hill SOLDC Green Belt changes				
75_2	Keith Austin	Protection of Green Belt should be paramount. Green Belt should not be altered, on environmental and habitat protection grounds. There is insufficient Green Belt amenity land for residents to enjoy.	As outlined in the response to 192_1, responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality. The parcels proposed for release from the Green Belt have previously been, and will continue to be, used for aviation related purposes.	No modification
165_1	Steve Barnes Downe Residents Association	Unsound justification for creeping erosion of Green Belt at Biggin Hill SOLDC (notably Tyler Grange parcels 1, 2 (West Camp) 8, 10, 11 (East Camp) and 12 (former tip north of East Camp)	As outlined in the response to 192_1, responding to independent advice, the Council has concluded that certain Green Belt parcels can be released to deliver a level of growth commensurate with the	No modification

			SOLDC designation, whilst also protecting the values of the broader Green Belt in this locality.	
83_7	Matthew Spry NLP for Biggin Hill Airport Ltd	Sustainability Appraisal fails to demonstrate how alternative approaches to Green Belt release have been adequately appraised. Lack of release at East Camp means sensible decanting cannot be achieved. Retains Green Belt parcels that its own evidence claims do not meet Green Belt test.	Whilst the Sustainability Appraisal Report did not present an appraisal of alternatives in relation to all matters associated with Biggin Hill, this does not indicate a procedural failing. The Report must present an appraisal of "reasonable alternatives" and the reasons for selecting alternatives dealt with. The Council may apply discretion and planning judgement when decided what should be the focus of an appraisal of reasonable alternatives. The Report adequately covers this matter in paras 6.3.1, 6.2.18 and 6.2.20, as well as Appendix 1 (the "regulatory checklist").	No modification

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

Draft Policy 111: Crystal Palace SOLDC

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 111 Crystal Palace SOLDC				
58_9	Sports England	<p>The reference to the maintenance, enhancement and support of the existing sports functions is welcomed but the section should be in line with Sports England Planning Policy Statement 'Planning for Sport Aims and Objectives'.</p> <ol style="list-style-type: none"> 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport. 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable. 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation. <p>Furthermore, this section and policies should be in line with Paragraph 74 of the NPPF and Sport England's Playing Fields Policy (http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/).</p> <p>Sport England would welcome dialogue at the earliest stage as any proposals develop.</p>	<p>The importance of Crystal Palace's sporting facilities is recognised through clauses 1 and 2 of the policy as clause 1 states that :</p> <p>Para. 1: <i>"The Council will expect any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC) {...} to maintain, enhance and support the unique existing strategic cultural, <u>sports</u>, tourism and leisure functions of the Crystal Palace Park"</i> [emphasis added].</p> <p>Para. 2: <i>"Any development proposals [...] will be expected to contribute to and/or strengthen as appropriate the sub-regional importance of the SOLDC"</i>.</p> <p>Draft Policy 21 of the Proposed Submission Draft Local Plan Opportunities for Community Facilities, which any development proposal related to sports facilities in CPP would have to comply with is in line with Sports England Planning Policy Statement Planning for Sports Aims and Objectives which are referenced in the supporting text. Any proposal in CPP would be required to comply with policies in the local plan as a whole.</p> <p>As a statutory consultee on planning applications affecting playing fields Sports England will be consulted and any proposal will be required to comply with policies in the Local Plan and with the Development Plan as a whole and para 74 of the NPPF, reflected in Local Plan Draft Policy 58 Outdoor Sports Recreation and Play. Sports England's request to be consulted at the earliest stage as proposals for the National Sports Centre</p>	No modifications

			as a whole develop is noted.	
59_57	London Wildlife Trust	Welcomes the recognition of the Park's importance for biodiversity and nature conservation and that it is mostly designated as a Borough SINC (para 6.4.15).	Noted.	No modifications.
111_4	Francis Bernstein	<p>6.4.7 Incorrect reference to the National Sports Centre being Grade II Listed when it is Grade II* Listed.</p> <p>Additional wording for insertion is suggested providing more background information regarding the building's significance: <u>"The NSC is Grade II* (and is not "Grade II"). The Twentieth Century Society have commented the NSC is the most important post-war recreation building in the country, and its listing status puts it in the top 5.5% of buildings nationally. Architecturally, it is unrivalled by contemporary buildings of its type. It provides the park's "Principle" building, and is one of the parks key "heritage assets"."</u></p> <p>Bromley should require a Conservation Management Plan to sensitively enhance the building and bring it in line with modern requirements.</p> <p>6.4.8 Suggest adding reference to the National Sports Centre as an asset which combined with the park presents opportunities to generate growth of more than subregional importance.</p>	<p>Para 6.4.7, line 3- Reword to make reference to the park's exact listing status and add capital letters: "The Grade II* listed historic Metropolitan Park"</p> <p>It is not however considered necessary to expand on the significance of the National Sports Centre in the supporting text of the policy. Historic England's website provides an official description of the significance of listed buildings, and any planning application would need to take the building's significance into consideration in line with relevant policies and guidance in Bromley's Development Plan.</p> <p>Any planning application involving the possible refurbishment, enhancement and part redevelopment of the National Sports Centre site by the GLA would have regards to relevant policies re: listed buildings in the Local Plan and may be accompanied by a Conservation Management Plan issued by the building's landowner.</p> <p>6.4.8. Reference to the park presenting opportunities to generate growth of more than subregional importance implicitly makes reference to ALL of the assets which it contains, and not only the National Sports Centre. The importance of the National Sports Centre as an asset for the park with the potential to contributing to growth of more than subregional importance is recognised by the approved masterplan for the park referenced in para. 6.4.13 of the supporting text to the policy in para 6.4.14 where it is stated that the Council will work with the Mayor and other stakeholders to ensure that adequate</p>	<p>Minor modification.</p> <p>No modification.</p> <p>No modification.</p> <p>No modification.</p>

		<p>6.4.12. Inaccurate statement that the National Sports Centre is no longer suited to Olympic use. Actually, the NSC has been significantly invested in for 2012 Olympics and beyond, and is now a fully functional Olympic training facility, with major competition grade swimming, diving and athletics facilities.</p> <p>The National Sports Centre (NSC) houses one of Crystal Palace largest single employers, the Crystal Palace Physio Group. All planning for the park needs to consider the combined vitality and business sustainably of both the park and the NSC. Integrated planning of both NSC and park areas is essential.</p> <p>6.4.16 – Make reference to the fact that the SOLDC should “enhance and benefit” Crystal Palace District Centre rather than “capture broader benefits for Penge District Centre and the more local Anerley Centre”. This is because Inappropriate SOLDC development by scale or function could adversely harm Crystal Palace District Centre and so there is a need to ensure that overall benefits are appropriate to the unique character and function that CP District Centre has in relation to the directly adjoining park.</p>	<p>development capacity is identified in relation to the NSC which supports the SOLDC designation. The National Sports Centre as a an asset with the potential to generate growth of more than subregional importance is referenced in the Assessment of the Proposed Crystal Palace SOLDC Area Against the London Plan Town Centres SPG Potential Criteria (Figure 7.2) in the SOLDC Background Paper. The National Sports Centre is also key in establishing that one of the SOLDC’ strategic strengths is its leisure function.</p> <p>6.4.12 Reword- “The Grade II Listed centre is a historically significant sports and leisure facilities <u>which is used to host national and international sporting events and has been used to host Olympic training events</u>”.</p> <p>The Crystal Palace Park policy recognises that the planning of the park and of the National Sports Centre requires integration in the context of the SOLDC designation through para 6.4.14 which will be amended to read, to respond to representation DLP193_16 by Historic England, that “<i>the Council will work with the Mayor, <u>Historic England</u> and other stakeholders to identify adequate development capacity and ensure it supports the SOLDC designation should any development come forward</i>”.</p> <p>Suggested revision to include: 6.4.16., line 2/3. <i>Policy 15 seeks to maximise the opportunities for proposals presented by the Crystal Palace SOLDC so that they contribute and benefit from the thriving cultural and leisure economy of Crystal Palace’s District Centre, <u>and enhance as well as capture broader benefits for Penge District Centre, and the more local Anerley centre.</u></i></p>	<p><u>Minor modification.</u></p> <p><u>Minor modification.</u></p> <p><u>Minor modification.</u></p>
--	--	--	---	--

119_1	Ken Lewington, Crystal Palace Foundation	<p>The following elements are stated to relate to the plan's soundness:</p> <p>Para 6.4.7. Makes reference to Crystal Palace Park being Grade II, whilst it is Grade II* listed.</p> <p>Para 6.4.10. Minor suggested rewording. Make reference to "<u>Crystal Palace which, in its original form, housed the Great Exhibition of 1851 on Hyde Park</u>" rather than "<i>Crystal Palace, the structure which originally housed the Universal Exhibition in 1851.</i>" The Reference to the <i>Universal Exhibition</i> is incorrect; its short title was the "<u>Great Exhibition</u>".</p> <p>6.4.13. Clarify in the supporting text that the London Development Agency ceased to exist as a separate entity when it was '<i>folded into</i>' the Greater London Authority in March 2012.</p>	<p>This comments made do not relate to the soundness of the Local Plan per but are requests for minor factual amendments which can be easily be made without affecting the overall soundness of the plan.</p> <p>Para 6.4.7, line 2: Refer to the "Grade II* listed historic <u>Metropolitan Park</u>".</p> <p>Para 6.4.10, line 1-2: Refer to the "<u>Crystal Palace, which, in its original form originally housed the Great Exhibition in 1851 on Hyde Park</u>".</p> <p>Para 6.4.13, line 1. No change is being proposed in this particular paragraph. It is however proposed to make reference to the context in which the masterplan was adopted in the introductory Planning Context to the policy, also responding in this instance to Historic England's comments on Para 6.4.8 (rep DLP193_16) : The following revisions are to include to set out the context with more clarity:</p> <p><u>In 2011, a Masterplan submitted by the London Development Agency (LDA) (incorporated into the Greater London Authority in 2012), was granted outline planning permission for the duration of 15 years.</u></p>	<p>Minor modifications.</p> <p>Minor modification.</p> <p>Minor modification.</p> <p>No modification.</p>
157_2	Senaka Weeraman (individual)	<p>Queries how transparency will be ensured re: any scheme similar to the Rong Zhong process.</p> <p>Wishes to see the asset which is Crystal Palace treated as the gateway to the centre of London rather than its backyard.</p> <p>Queries whether there will be any housing, including any social housing in Crystal Palace Park and any flats at social rent. Against pressure of housing in Crystal</p>	<p>The importance of Crystal Palace in outer London is recognised through its proposed designation as a Strategic Outer Development Centre which aims to enable its leisure, tourism, sports and culture functions of more than sub regional importance to be strengthened.</p> <p>The Council entered an exclusivity agreement with e Rong Zong which expired in February 2015, and Rong Zong's decision not to purchase land in Crystal Palace</p>	No modifications

		<p>Palace.</p> <p>Queries how the Dinosaurs in Crystal Palace will be connected with Darwin House in Downe.</p> <p>Queries whether the tram line will run through Crystal Palace Park.</p>	<p>Park, The Council's Executive in March 2015 approved that an alternative management option involving a Sustainable Business Plan in line with the 2007 LDA (now GLA) masterplan for the park should be developed. The Masterplan identified proposals for the improvement and enhancement of Crystal Palace Park which would strengthen its role as a major London wide leisure tourism and cultural asset.</p> <p>Residential development for 180 units was granted outline planning permission on the sites of Sydenham and Rockhill Gates as part of the 2007 Masterplan however sensitive siting on existing brownfield land has been sought and the proposed design of these schemes seeks environmental improvements which would improve the Park.</p> <p>This development as proposed would contribute significantly to enabling the regeneration of the park and implementing elements of the Crystal Palace Park Masterplan. The provision of housing as part of the updated Regeneration plan for Crystal Palace would be subject to other housing policies of the Development Plan including Draft Proposed Local Plan Policy 2, "<i>Provision of Affordable Housing</i>" which sets out the proportion and the type of affordable housing required on developments of 11 units or more or of at least 1000 sq.m.</p> <p>The Draft Crystal Palace SOLDC policy, whilst expecting any development proposals within Crystal Palace SOLDC to support its identified leisure, cultural and sports strengths also recognises and puts strong emphasis on the constraints and limitations associated with the existing planning and historic designations applying to the park and assets within it (including its Metropolitan Open Land designation, Conservation Area status and locally and statutory listed buildings and assets within it).</p>	
--	--	--	---	--

			<p>Interpretation panels are currently being installed in the dinosaur landscape at Crystal Palace Park as part of the Improvement Scheme works and make reference to Charles Darwin whose work inspired these sculptures.</p> <p>There are currently no plans in place to safeguard land in Crystal Palace Park for Transport Improvements.</p>	
193_16	Historic England	<p>The following changes are recommended to bring the Local Plan in line with the NPPF and ensure soundness.</p> <p>Refer more consistently and prominently to the status of Crystal Palace as a Historic Park and Grade II*. Changes are recommended to the text for example 6.4.7. <i>'The Council acknowledges that the development potential of sites within the proposed SOLDC is constrained by the park's designation as MoL, and by the need to conserve and enhance the significance of numerous heritage assets. The park is on the national register of Historic Parks and Gardens (grade II*) and has particular historic and cultural significance as the former site of Joseph Paxton's Crystal Palace. It includes the listed terraces and Sphinxes from the Crystal Palace, Grade I listed prehistoric sculptures of monsters and dinosaurs and the grade II* listed National Sports Centre. The whole is designated as a conservation area.'</i></p> <p>Para 6.4.8 Clarify the status of the planning permission, whether it is current, and the position with the latest analysis of options. Clarify matters in relation to the process being followed for the National Sports Centre.</p>	<p>Suggested revision to include:</p> <p>6.4.7 <i>The Council acknowledges that the development potential of sites within the proposed SOLDC is constrained by the park's designation as Metropolitan Open Land by its conservation area status and by the need to conserve and enhance the significance of its numerous heritage assets. its conservation area status. Crystal Palace Park is highly accessible with five train and overground stations within walking distance. The Grade II* Listed Metropolitan Park is on the national register of Historic Parks and Gardens and has particular historic and cultural significance as the former site of Joseph Paxton's Crystal Palace .It includes nationally and regionally important assets including the Grade II* listed National Sports Centre, the remaining listed terraces and sphinxes from the Crystal Palace and the Grade I listed prehistoric Victorian sculptures of monsters and dinosaurs. The whole is designated as a conservation area.</i></p> <p>Para 6.4.8. The process relating to the latest analysis of options is more adequately set out in the Crystal Palace Background Paper in the detail as these are being developed.</p> <p>The following revision is however proposed to set out the context relating to the masterplan for more clarity, in line with the response to DLP119_1 :</p>	<p><u>Minor modifications.</u></p> <p><u>Minor modification.</u></p>

		<p>The CP SOLDC is atypical and the plan needs to accommodate this. Background paper usefully identifies the specialist strengths/nature of the park/sensitivity/role in the area.</p>	<p>In 2011, a Masterplan submitted by the London Development Agency (LDA), folded into the Greater London Authority in 2012, was granted outline planning permission for the duration of 15 years. The Masterplan seeks to restore and improve the park and reinstate its national and international status. The park presents opportunities to encourage growth of more than sub-regional importance beyond its boundaries particularly through visitor spend in Crystal Palace and other neighbouring town centres within the Crystal Palace, Penge and Anerley Renewal Area. Planning permission was granted for a masterplan which seeks to restore and improve the park and reinstate its national and international status. The delivery of key capital projects is already underway, such as that of the restoration of the Dinosaurs. The GLA has also been considering options for elements of development and redevelopment on the site of the National Sports Centre.</p> <p><u>Additional Note:</u></p> <p>The GLA is currently reviewing options for the future of the National Sports Centre but the process and timescales for doing so are unknown.</p> <p>Noted. The Draft SOLDC Policy does acknowledge the atypical nature of the Crystal Palace SOLDC throughout stressing the wide variety of its heritage assets its MOL status and its biodiversity value.</p>	<p>No modification.</p>
--	--	--	---	-------------------------

193_17	Historic England	<p>Draft Policy 111 Crystal Palace Strategic Outer London Development Centre, p206 recommend that:</p> <ul style="list-style-type: none"> Reference heritage assets in the opening paragraph, for instance: <i>'...leisure functions of the Crystal Palace Park and the significance of its heritage assets'</i>. Amended the second para to read: <i>' ... guidance related to the Crystal Palace Park Conservation Area, historic park and listed buildings and ...'</i> Consider inserting the date of the 2007 Masterplan to ensure that the objectives referred to are clearly identified to minimise the danger of delegating to further supplementary guidance matters that should be evident in the plan. <p>Para 6.4.12 - The sports centre is Grade II*</p>	<p>No amendments are being proposed to para. 1 of the policy. The importance for any development proposals to take heritage assets into consideration is recognised through clause 2 of the policy, clause 1 relating to the specialist strengths of the SOLDC in line with the GLA's policy on SOLDCs.</p> <p>No amendments are being proposed to para. 2 of the policy. The importance of CPP's historic park status and the assets of historic significance within it are recognised through wording in the supporting text of the policy, notably in paras 6.4.12 and through the proposed rewording of para. 6.4.1. The wording of clause 2 of the CPP policy sets out that <i>"any development proposals will be subject to other policies within the Local Plan, notably Metropolitan Open Land policies and guidance related to the Crystal Palace Park Conservation Area"</i> [emphasis added]. This particular wording does acknowledge that there may be other guidance related to other open space and heritage matters which any planning application would require to pay heed to. In addition, any planning application would be required to comply with the development plan as a whole, taking any guidance and policies related to heritage assets into consideration.</p> <p>The year in which the existing Crystal Palace masterplan was approved is referenced in the supporting text to the policy, para 6.4.13. As there only is one adopted Masterplan for CPP, it is not considered necessary to reiterate this fact within the policy itself.</p> <p>6.4.12. Agree factual amendment as follows: The Grade II* Listed centre is a historically significant sports and leisure facility [...].</p>	<p>No modifications.</p> <p>No modifications.</p> <p>No modifications.</p> <p>Minor modification.</p>
--------	------------------	--	--	--

		here.	<p><u>Register of Historic Parks and Gardens which includes a large number of significant assets including the Grade II* Listed National Sports Centre, the Grade II listed upper and lower terraces of the Crystal Palace Gardens, lower palace station, bust of Sir Joseph Paxton, gatepiers to Rockhill , Royal Naval Volunteer Reserve Trophy War Memorial and the Grade I prehistoric animal sculptures and geological formations by the lake.</u>" The significance of these assets is described in Historic England's National Heritage List for England, recognised in the adopted Masterplan and managed through Development Plan policies.</p> <p>6.4.16. No amendments are being proposed to this supporting paragraph to the Crystal Palace SOLDC policy which touches upon the relationship of the Crystal Palace Park to the broader CP, Penge and Anerley Renewal Area. The Historic Park and Garden status of the park is already recognised through the proposed amendments to para 6.4.15 in response to HE's comments and it is also proposed to make reference to this status in the reworded version of para. Para 6.4.7 (see the proposed response overleaf).</p>	No modification.
--	--	-------	--	------------------

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

Chapter 7: Environmental Challenges

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Chapter 7 – Environmental Challenges				
59_58	Matthew Frith, London Wildlife Trust	Reference to the impact of climate change upon biodiversity and habitats is recommended.	The general thrust of the sustainable design and construction policy, in conjunction with the nature conservation policies in the Valued Environments section are considered to adequately cover impacts on biodiversity and habitats. The borough's Biodiversity Action Plan also provides relevant information that can be used in decision making.	No modification.
151_6	Ann Garrett, Bromley Friends of the Earth	The Local Plan will create a worrying and serious health impact on air and noise pollution levels and the water table.	The National Planning Policy Framework requires the Local Plan to set out land use policies which enable the objectively assessed needs of the borough to be met as far as possible but without compromising other key outcomes including environmental protection and health and wellbeing. The Sustainability Appraisal of the Draft Local Plan finds that, overall, the Plan is likely to have a positive outcome. This is achieved by allocating development sites in the most sustainable areas and including policies to protect the environment and mitigate potential adverse impacts.	No modification.
152_4	John Street, Bromley Green Party	The Local Plan will create a worrying and serious health impact on air and noise pollution levels and the water table.	As above.	No modification.
Draft Policy 112 – Planning for Sustainable Waste Management				
157_8	Senaka Weeraman	How will the Local Plan make sure provision for recycling is not compromised?	Policy 113 in the Draft Local Plan requires adequate space to be provided in new development for the storage and separation of recyclable materials. The London Plan sets targets for waste management which require all boroughs to reduce waste and increase recycling rates.	No modification.
Draft Policy 115 – Reducing Flood risk				
59_59	Matthew Frith, London Wildlife Trust	Supports.	Noted	No modification.

Draft Policy 116 – Sustainable Urban Drainage Systems				
59_60	Matthew Frith, London Wildlife Trust	Supports.	Noted	No modification.
Draft Policy 117 – Water and wastewater infrastructure				
28_1	Richard Hill, Thames Water	Supports.	Noted	No modification.
Draft Policy 118 – Contaminated Land				
44_3	Stephanie O'Callaghan, Quod for Scotia Gas Networks	Suggests new policy for Hazardous Substances and Installations, to reflect London Plan Policy 5.22, to state that the Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal.	The London Plan is part of the Borough's Development Plan so is not considered necessary to repeat this policy in the Local Plan.	No modification.
Draft Policy 122 - Light Pollution				
59_61	Matthew Frith, London Wildlife Trust	Supports.	Noted	No modification.
Draft Policy 123 - Sustainable Design and Construction				
36_7	Thomas Leigh, Colliers for Aberdeen Asset Management	It is welcomed that Draft Policy 123 requires all applications for development to take into account the principles of sustainable design and construction. We also support the wording of the policy, which is not overly prescriptive and can therefore be applied to all applications. This is considered essential to ensure the delivery of the Local Plan vision.	Noted.	No modification
43_6	Sarah Williams, Sustain	The policy should include a clause about the provision of space for food growing in line with the Mayor's Sustainable Design and Construction SPG. Space for food growing should be provided where possible and appropriate and should include adapting existing spaces and temporary spaces.	The final bullet point at 7.0.59 could be amended to include provision for food growing " <i>Promote and protect biodiversity and green infrastructure including space for food growing where appropriate</i> "	Minor modification.
Draft Policy 124 – Carbon Reduction				
18_5	Katie Miller, Kent Downs AONB	The AONB Unit welcomes the requirement for proposals for major developments to investigate the potential for connecting to a decentralised heat/energy network or developing a new site-wide network. We would welcome specific reference to the opportunities for using wood fuel in Bromley Borough. Best practice is to secure locally sourced renewable energy and given the large number of woodlands in the area there is huge potential for wood fuel to contribute to achieving renewable energy targets.	Whilst it is acknowledged that there is potential for wood fuel as a renewable energy source, it is not considered necessary to be specific. There are currently particular concerns about the adverse impacts of wood fuel emissions on air quality in London as a whole.	No modification.
25_5	James Stevens, House Builders Federation	The carbon reduction policy is unjustified. No viability assessment has been presented to show	The carbon reduction target for major developments is set in the London Plan.	No modification.

		that it will not compromise the deliverability of development sites.	Bromley's Local Plan Viability Assessment has included an estimate of specific additional costs of "zero carbon" and has shown Bromley's Draft Local Plan to be viable overall. It is recognised that some development sites have practical constraints and unusual costs – in these cases, energy assessments, and viability assessments, will be required to demonstrate the reasons for any shortfall in the carbon reduction target.	
36_8	Thomas Leigh, Colliers for Aberdeen Asset Management	<i>Draft Policy 124: Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy</i> We support Draft Policy 124 and consider that the objectives of the policy align with those set out at paragraph 93 of the NPPF, which states that planning should support the delivery of renewable and low carbon energy and associated infrastructure. It is also welcomed that sufficient flexibility is provided for carbon dioxide reduction targets to be met off-site, if appropriate.	Noted.	No modification
40_4	Lucy Bird, St William Homes	In line with National policy and Ministerial Statement, any principles to incentivise delivery of low carbon and renewable energy should be outlined in planning guidance not policy. The amendment of section 43 of the Deregulation Bill which will be implemented later this year prevents Local Authorities from setting energy or water efficiency standards through planning policy. Therefore, the proposed reference to London Plan 5.2B and the suggestion of Zero Carbon charging should be omitted from the draft Local Plan.	The Ministerial Statement issued on 25th March 2015 stated that the Government expects energy efficiency targets not to go beyond Code 4 (19% better than Part L 2013). However this announcement has not amended legislation and does not alter published planning policies, including that in the London Plan. Lord Bourne – during debate on the Neighbourhood Planning Bill - clarified that local authorities <i>can</i> require higher standards than those set out in the national technical standards. The London Plan policy is supported by a viability assessment and Bromley's own whole-plan viability study includes the achievement of "zero carbon" in major residential schemes.	No modification.
59_62	Matthew Frith, London Wildlife Trust	Surprised that there is no consideration of solar arrays in the countryside.	The rural area of the borough – where solar arrays would be likely to be sited – is designated Green Belt. Any application for inappropriate development would have to demonstrate very special circumstances and this is considered to be a suitably rigorous test.	No modification.
61_11	Kieran Wheeler, Savills for Bellway Homes	The viability of zero carbon should be considered. The method of securing carbon off-setting should be set out.	The carbon reduction target for major developments is set in the London Plan. Bromley's Local Plan Viability Assessment has	No modification.

			included an estimate of specific additional costs of “zero carbon” and has shown Bromley’s Draft Local Plan to be viable overall. It is recognised that some development sites have practical constraints and unusual costs – in these cases, energy assessments, and viability assessments, will be required to demonstrate the reasons for any shortfall in the carbon reduction target. Carbon off-setting contributions will be secured through s106 agreement and the Planning Obligations SPD has been amended to include this provision.	
157_10	Senaka Weeraman	How does Local Plan promote generation of renewable energy for its growing population	Major developments are required to reduce carbon by targets set in the London Plan. In order to achieve these challenging targets, many developments will need to include an element of renewable energy infrastructure. The Council supports the diversification of energy supply but the development of renewable energy infrastructure (where it requires planning permission) will need to comply with relevant policies in the Local Plan.	No modification.

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

Chapter 8: Delivery and Implementation and Appendix 10.13: Infrastructure Delivery Plan Schedule

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Draft Policy 125 – Delivery and Implementation of the Local Plan				
48_4	Samantha Powell, Education Funding Agency	Supports use of developer contributions and CIL to deliver Education infrastructure requirements. Recommends Bromley's future CIL includes Education on the draft Reg 123 list.	Note welcome support for use of developer contributions and CIL to deliver Education infrastructure requirements.	No modification
62_2	Cherrie Mendoza, Highways England	In accordance with DCLG guidance, any development contributions towards SRN improvements should be secured via s278 agreements, and not via s106 or a CIL 123 List. The use of s278's will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the improvement of the SRN.	The scale and traffic impact of any particular development will govern whether s278 is more appropriate than s106 (or vice versa) although it is not unusual to require both, i.e. a junction improvement (s278) plus funding of a new or enhanced bus service (s106). References to s278 in addition to s106 will be made. Insert to last sentence in supporting text:- Para 8.0.3 'Where existing and planned provision of infrastructure, facilities and services are inadequate to meet the needs generated by a proposal, the Council will negotiate planning obligations <i>or agreements (s106 and/or s278 of the Highways Act 1980)</i> to secure measures to meet those needs'. Para 8.0.5. Add to last sentence in supporting text:- Pooled contributions will be used within the restrictions of the CIL Regulation 123; <i>however, there is no limit for the pooling of s278 agreements.</i>	Minor modification
71_18	Tony Allen, The Chislehurst Society	Para 8.0.3 – not clear enough – more transparent mechanism should be developed to demonstrate CIL investment is used in localities concerned.	Para 8.0.3 concerns the retained use of planning obligation (s106) within the context of CIL regs 122 and 123. This draft Local Plan para was never intended to prescribe the use of CIL but to explain the future context of s106. However at para 8.0.9 there is clarification for the uses of the neighbourhood element of CIL which would only be available in the areas where development/growth occurs. A local Bromley CIL is yet to be developed. There will be two dedicated CIL public consultation periods before examination therefore details of mechanisms	No modification

			for CIL Governance and procedures are to be developed under a separate process.	
168_15	Dr Elanor Warwick, Clarion Housing Group	The Borough should consider limiting CIL contributions for non-profit making developers to take account of the additional social benefits that Clarion (<i>Housing Association</i>) can bring when developing. Delivering affordable housing and homes for social rent relies on a combination of funding sources Encouraging the Council to build alliances to prioritise affordable homes, and dispose of their own land to achieve their affordable housing targets (as other councils do). Suggestion that the Council could consider disposal of Council land to achieve affordable housing targets “as other councils do”.	CIL contributions are a matter for consideration in the development of a local CIL; for which there will be two separate 6 week public consultations, firstly for a Preliminary Draft Charging Schedule and followed later by the Draft Charging Schedule before submission and examination. Note the advice to build alliances with stakeholders and the suggestion of land disposal.	No modification
Appendix 10.13 – Infrastructure Delivery Plan Schedule				
23_7	Patrick Bloom	Not clear	The reason for the IDP and table of projects at Appendix 10.13 is explained in Chapter 8 Delivery and Implementation at para 8.0.2.	No modification
34_2	Emma Talbot, London Borough of Lewisham	Extension of DLR to Bromley North and extension of Bakerloo Line to Beckenham Junction and then Bromley South – these projects may impact on our ability to pursue our preferred approach of extending the Bakerloo line to Lewisham and then ultimately to Hayes.	LB Bromley is currently looking at a range of options to improve rail access between Bromley and Central London and neighbouring Boroughs including the extension of the Bakerloo Line to Bromley North via Lewisham and is currently in the process of lobbying Councillors and the Mayor to have this included in future transport programmes.	No modification
39_10	Andrew Dorrian, Transport for London	Requests changes and clarifications as follows:- Roads A21- Increasing roads space is deemed not to have significant benefits. Request for a pedestrian/cyclist improvement project be considered.	Roads It is noted that the Council is working with TfL to improve the A21 area. A current study and modelling exercise is being undertaken will suggest improvements for walking/cycling. However improving facilities for pedestrians, cyclists, and buses, which the Council supports, may impact upon capacity for car traffic. TfL has not provided pedestrian facilities at this junction and expects the Council to remedy the situation. The Council does not manage this link, and without improvements this could be a barrier to the Bromley Town Centre Action	No modification

		<p>A233/A232 Keston Mark – supported but with financial constraint.</p> <p>Oakley Road/Bromley Common – amend description of scheme.</p> <p>Cycling and Walking Request removal of cycle improvement scheme at A21 Kentish Way/Stockwell Close due to complete March 2017.</p> <p>Requests further clarification of improvements at A21/Farnborough Way.</p> <p>Quietways and Cycle Superhighways schemes welcome support.</p> <p>Rail No objection to retention of Tramlink, and DLR as projects but caveats that these are not funded nor planned by TfL.</p> <p>Supports inclusion of stabling and capacity schemes at Elmers End and Beckenham Junction.</p>	<p>Plan. A233/A232 Keston Mark – note support but that funding would be required. This is a disappointment given the designation by the GLA of a SOLDC at Biggin Hill and that TfL’s own Bus Priority Programme has identified this junction as a major source of delays for buses. LB Bromley requesting an urgent meeting. Oakley Rd/Bromley Common – amend text ‘Realignment and signalisation’ of junction.</p> <p>Cycling and Walking Amend table entry :- Schemes to improve safety at A21 Kentish Way/Stockwell Close <i>A21 Farnborough Way, 100m north of Green Street Green.</i></p> <p>A21/A232 Farnborough Common, the Council is happy to review the current proposal and understands that any changes will need to have the consent of TfL. Quietways and Cycle Superhighways comment noted.</p> <p>Rail TfL’s position regarding Tramlink and DLR noted.</p> <p>Acknowledge projects are part of Trams 2030 Strategy.</p>	<p>No modification</p> <p>Minor modification</p> <p><u>Minor modification</u></p> <p>No modification</p> <p>No modification</p> <p>No modification</p> <p>No modification</p>
58_10	Dale Greetham, Sport England	No robust evidence base for playing pitches and indoor sports facilities in the plan or for the IDP/ CIL.	Whilst a playing pitch strategy has not been undertaken, an audit and assessment of Open Space, Sport and Recreation is nearing completion and will be available at the time of the EIP. The data associated with this has been drawn directly from the Sport England Database through ‘Active Places Power’ and using this the authority is satisfied that the policies are sound and that sufficient provision exists in the case of both public open space and sport provision.	No modification

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

Chapter 9 – Glossary

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Section 9 - Glossary				
26_3	Michael Meekums, Orpington and District Archaeological Society	ODAS is content with glossary wording.	Comments noted.	No modification.
59_63	Matthew Frith, London Wildlife Trust	Recommended addition under Biodiversity to read <u>"Bromley Biodiversity Plan 2015-2020: Sets out the strategy for maintaining and enhancing biodiversity within the London Borough of Bromley."</u>	A separate definition for the Bromley Biodiversity Plan will be added to the glossary.	Minor modification.
63_3	Jonathan Best, Montagu Evans for Travis Perkins	General definition for employment land/sites is supported. In some circumstances (policy 81) uses in SIL areas are defined on a more specific and narrower definition (B1b/c, B2 and B8 uses).	Support noted. The wording is intended to capture all scenarios and designations where Class B uses (and non-Class B uses consistent with a designated employment area) are protected and promoted, as supported by the Council's evidence base. This includes areas designated primarily for their employment generating functions, including Strategic Industrial Locations, Locally Significant Industrial Sites, Office Clusters and Business Improvements Areas. It also encompasses non-designated sites containing Class B operations, which the Council seeks to retain for Class B or similar employment generating purposes.	No modification.

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

Appendix 10.12 – Monitoring Framework

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Appendix 10.12 – Monitoring Framework				
181_10	Peter Martin	Monitoring should cover all heritage assets, not just listed buildings. The 'indicator' column should make reference to the demolition of locally listed buildings and buildings that make a positive contribution to conservation areas as well as listed buildings. The 'key policies' column should include Locally Listed Buildings and Conservation Areas as well as Listed Buildings.	The demolition of locally listed buildings can be monitored internally and should be included as part of the monitoring framework. The Key policies column will be amended to reflect all relevant policies.	<u>Minor Modification.</u>

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

Policies Map Sets

DLP no.	Representor	Summary of response	Officer comment	Recommendation
Policies Map Set 1 - MOL				
20_1	Justin Rose	<p>He wishes to see the MOL designation on this land at 224 Harrington Road, South Norwood removed. When the MOL boundary was first defined, the property was the Keepers Lodge associated with the cemetery to the north and east.</p> <p>Since the building of the tram line, on what was also part of the cemetery site, 224 Harrington Road has been physically separated from the open land which forms the cemetery.</p> <p>The removal of the MOL designation would mean that 224 Harrington Road could, in planning terms be treated in the same way as the terraces to the south west on Harrington Road which were built after number 224 (e.g. extensions).</p>	<p>The property stands alone, with surrounded on all sides by Metropolitan Open Land (in L.B. Croydon as well as L. B. Bromley), it does not adjoin the nearby residential properties. There are similar instances properties subject to GB, MOL and UOS designations and policies elsewhere in the borough, mostly formerly associated with schools or parks.</p> <p>The designation as MOL does not preclude extensions to residential properties which are dealt with under Draft Policy 51, which also applies to Green Belt.</p>	No modification
Policies Map Set 1 – Green Belt				
64_1	Mark Harris Barton Willmore for Mr & Mrs Vansteenkiste	Green Belt boundary should be amended to exclude their site “The Holdings” in Chelsfield which does not contribute to the Green Belt.	<p>There are numerous similar property arrangements similar to this within the grounds of the residential properties immediately to the west of this site (and in other parts of the Green Belt fringe in the borough) where the same arguments could be put forward. If the arguments proffered were to be accepted a similar approach would have to be adopted with regard to these properties.</p> <p>The stable block, sand school and associated access drives are regarded as appropriate in the Green Belt; consequently there is no justification for removing them to permit more intensive development which would constitute an inappropriate use if the boundary were not altered.</p> <p>As far as the SINC is concerned by its very nature such areas do not necessarily conform to cartographic boundaries and in any event the ecology in question only has to be taken into</p>	No modification

			account when an application for development is proposed, it does not preclude development per-say.	
Policies Map Set 2 – Green Belt and Urban Open Space				
27_1	David Clapham	There are elements of the National Planning Policy Framework document dated March 2012, which have not it seems been given sufficient attention when referring in particular to the land on the edge of Keston Village. There are two pieces of land involved, firstly Heritage Hill, which is being removed from the Green Belt and secondly a small piece of land fronting Fox Lane, which I have been trying to develop for many years. I believe that whilst the planning department's intentions are perfectly good, an opportunity may have been missed, while Heritage Hill is being removed from the Green Belt, to improve the Green Belt boundary and thus meet specific guidance from the National Planning Policy Framework.	<p>The approach adopted by the Council as far as the changes to open space designations are concerned was set out on the first page of the 'Suggested Changes to GB Boundary' document (<i>Context of the Review</i>) which was a supplementary document associated with the Draft Policies and Designations Consultation. Heritage Hill was removed as it was contiguous with the existing development.</p> <p>The land which the consultee wishes to see removed lies to the south and east of 57 Fox Lane (the last property which is not in the Green Belt). The land was the subject of an objection to the 1st Deposit Draft of the adopted UDP, the Inspector at that time stated in her report:</p> <p>"The dwellings at Nos. 67 and 69 Fox Lane and The Granary fall within the GB, but these properties are set on large plots in comparison with the more closely spaced houses on Fox Lane that fall outside the GB. Beyond the footpath adjacent to No 57 there is a sense of spaciousness with a rural feel to the area which is characteristic of this corner of Jackass Lane and Fox Lane."</p> <p>She recommended that no modification be made to the GB boundary. There have been no changes in this area which would warrant a different approach being adopted now.</p>	No modification
59_65	Matthew Frith, London Wildlife Trust	<p>Area 40: Entrance to Farnborough Primary School. We believe this is an unusual addition to Green Belt as it's the entrance road to the school and largely not of open character; it does meet the GB criteria.</p> <p>Area 74: Numbers 303 & 303A Main Road, Biggin Hill. Claimed to be part of gardens but are these land takes and this area was once rough grassland. De-designation of Green Belt sets a precedent for encouraging further de-designation</p>	<p>Site 40 – This site has received the same treatment as other school sites in the borough, the majority of which are covered by an open space designation, there is no reason why this one should be any different.</p> <p>Site 74 – this small area of land may wet have been 'rough Grassland at one time, however, it is now part of a residential curtilage and rear pedestrian access to 293-303a Main Road which are not in the Green Belt. Logically the designation</p>	<p>Site 40 – No modification.</p> <p>Site 74 – No modification.</p>

		from adjacent and nearby residential units.	(i.e. none) and should the same, making the Green Belt boundary follow a recognisable boundary on the ground and on the Ordnance Survey map.	
45_1	Mary Dawes, Bromley Common Allotment Garden Association	Sites 28 and 27: Errors in the maps for Turpington Lane – Education Allocation/ Local Green Space designation	<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 Set Part 2 the site is also proposed Local Green Space, in Appendix 10.8 - Site 65.)</p> <p>Amendment for correction and clarification</p> <ul style="list-style-type: none"> • ‘Changes to Green Belt Designations’, Site 27- Allotments between Former Blue Circle Sports Ground and Turpington Estate. GB to UOS For Education Purposes (also shown on UOS changes) • Map page 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>Because of the complexity of these sites and the changes proposed involving changes from GB to UOS, and designations as Local Green Space and Education, clarification is required and the map indicates the entire picture and the clarifications should be regarded as ‘minor amendments’.</p>	Minor Modification as outlined
Policies Map Set 2 – MOL				
59_66	Matthew Frith, London Wildlife Trust	<p>MOL at Crystal Palace Park (Map Set 2, Areas 10, 11 and 12) – why remove from MOL?</p> <p>Crittalls Corner Roundabout (Map Set 2, Area 65) – Objects to deletion from MOL.</p>	<p>Site 10 – This is not part of the park, it is highway land and therefore not MOL.</p> <p>Sites 11 & 12 – Site 11 is part of a small, but quite important amenity space opposite the entrance to Crystal Palace Park/National Sports Centre, it is separated from the park by site 10 and cannot be considered an integral part of the MOL. However, In combination with site 12 (currently un designated, warrants protection as UOS.</p> <p>Site 65 - Crittalls Corner roundabout, footway and verge south west side. The site is currently designated as UOS. Most land designated as UOS take the form of specific sites with certain functions, the land immediately to the west is a school site, this is not part of the school and unlike</p>	<p>Site 10 – No modification.</p> <p>Sites 11 & 12 – No modification.</p> <p>Site 65 – No modification</p>

		<p>Churchfields Road Depot (Map Set 2, Area 76) – recommend river becomes part of UOS</p> <p>Lower Road, St Mary Cray (Map Set 2, Area 132) – Object to removal of UOS</p> <p>Sopwith Close (Map Set 2, Area 157) – Object to removal of UOS</p>	<p>Site 64 to the north east, which has residential properties fronting on to it (<i>on the same page</i>), Site 65 is not considered to serve the same function.</p> <p>Site 76 - Most land designated as UOS take the form of specific sites with certain functions, the river is included in the public open spaces to the north east and south west, but no purpose would be served by including this small length of river in the UOS designation.</p> <p>Site 132- This is not part of the park, but the Church grounds, consequently it was considered appropriate to remove the designation to allow for any future development associated with the church.</p> <p>Site 157 – The boundary of the adjoining public open space is co-incidental with that of the residential properties in Sopwith Close, and that boundary should be the same for the UOS designation. This was a cartographic error on the UDP Proposals Maps, which is being rectified in this plan</p>	<p>Site 76 – No modification</p> <p>Site 132 – No modification</p> <p>Site 157 – No modification</p>
Policies Map Set 2 – UOS				
7_1	Nicola Barnard, Bespoke Senior Leisure Ltd	<p>The site of the Former Bowls Club, West Common Road, Hayes if it isn't already zoned C3 Residential it should be by virtue of the fact that in 2005 Planning Consent was granted for the entire site to be redeveloped to 10 very large apartments which are now known as Burton Pynsent House</p> <p>it should be noted that almost immediately opposite our site in West Common Road is Hayes Court which was zoned D2 Urban Open Space and within a Conservation Area. This was granted Planning Consent for Residential Use in 2014 under Planning Reference: 14/02364/FULL for Part Demolition of Hayes Court (Grade II Listed) and Change of Use to accommodate 8 Apartments and the erection of 15 detached houses with communal car parking and landscaping. This site is therefore no longer available for Urban Open Space and should now be also zoned C3 Residential</p>	<p>The site referred to together with what is now 'Burton Pynsent House' formed Hayes Common Bowls Club, formerly Hayes Country Club/Courage (Eastern) Ltd., Sports Ground.</p> <p>Firstly, Local Plan does not 'zone' areas for use classes, it designates the areas where certain policies apply.</p> <p>The flats referred to (Burton Pynsent House) are built on the footprint on the former clubhouse, and there was a legal agreement requiring a cricket ground to be laid out and a cricket and bowls pavilion to be constructed each to be let on 25 year leases. The permission did not sanction residential on the whole site.</p> <p>In the case of Hayes Court, the overall scheme, whilst extending onto the open space are of the site, was on balance considered acceptable.</p>	No modification

98_2	Ishpi Blatchley	Sites 51 & 52 - UOS deletion at Kingswood Glen. The triangle of land which has been removed from UOS is behind the electricity substation and within the site itself and I cannot see any reason why it has been removed. It may be that the intended deletion is to the north (in front) of the electricity sub-station. This needs to be amended particularly as the site is designated as a Local Green Space in the Local Plan.	Kingswood Glen is owned by the Council. When the amendments are taken into account the UOS LGS and SINC boundaries will be coincidental with the boundary of the land in council ownership. It is possible that the hatching and thickness of the lines has caused some confusion.	No modification
Policies Map Set Part 2 – Local Nature Reserves				
159_1	Judith John	<p>The LNR includes Newstead Wood. The only bits of this site omitted from the LNR (as they are not Bromley owned land) are 2 small remnants of Darrick Common:</p> <ul style="list-style-type: none"> • a small area west of Newstead Wood • and the triangle of land between La Tourne Gardens and Norman Close 	<p>These areas of Common Land are part of the Local Nature Reserve; the boundary should be amended to correct this error. Whether or not they are shown on the map the policy would have to apply to them as they are designated outside the Local Plan process and consequently correcting the boundaries is not something to which objections could be raised.</p> <p>There is a policy in the plan relating to LNRs so it is essential that they are correct. It is considered that this correction should be regarded as a 'minor amendment'.</p>	<p><u>Minor modification. Amend the boundary of the 'Darrick and Newstead Woods Local Nature Reserve to correct the error.</u></p>
59_67	Matthew Frith, London Wildlife Trust	It is not clear whether these are new or the only LNRs within the borough.	<p>Accepted, this should have been made clearer. Local Nature Reserves are designated outside the These are reserves which have come into existence since the adoption of the UDP, the existing Nature Reserves are shown on In Map Set Part 1.</p> <p>The changes, as such, will not be referred to on the final Local Plan maps. The Legend on the final maps will read 'Local Nature Reserves', as it does on the current UDP Proposals maps</p>	No Modification
Policies Map Sets – Additional Designations required				
193_18	Katharine Fletcher, Historic England	<p>1. The designation of Historic Parks and Gardens on the national Register of Parks and Gardens of Special Historic Interest should be shown on the Policies Map.</p> <p>2. We note that individual heritage assets, particularly listed buildings, are difficult to represent on the policies map. However, we</p>	<p>1. As these are specifically referred to in the policy, the sites should really be identified on the Local Plan Maps. Whether or not they are shown on the map the policy would have to apply to them as they are designated outside the Local Plan process.</p> <p>2. As these are specifically referred to in the policy, the sites should really be identified on the Local Plan Maps. Whether or not they are shown on the</p>	<p><u>1. Accepted, show these designations on the Local Plan Maps.</u></p> <p><u>2. Accepted, show these designations on</u></p>

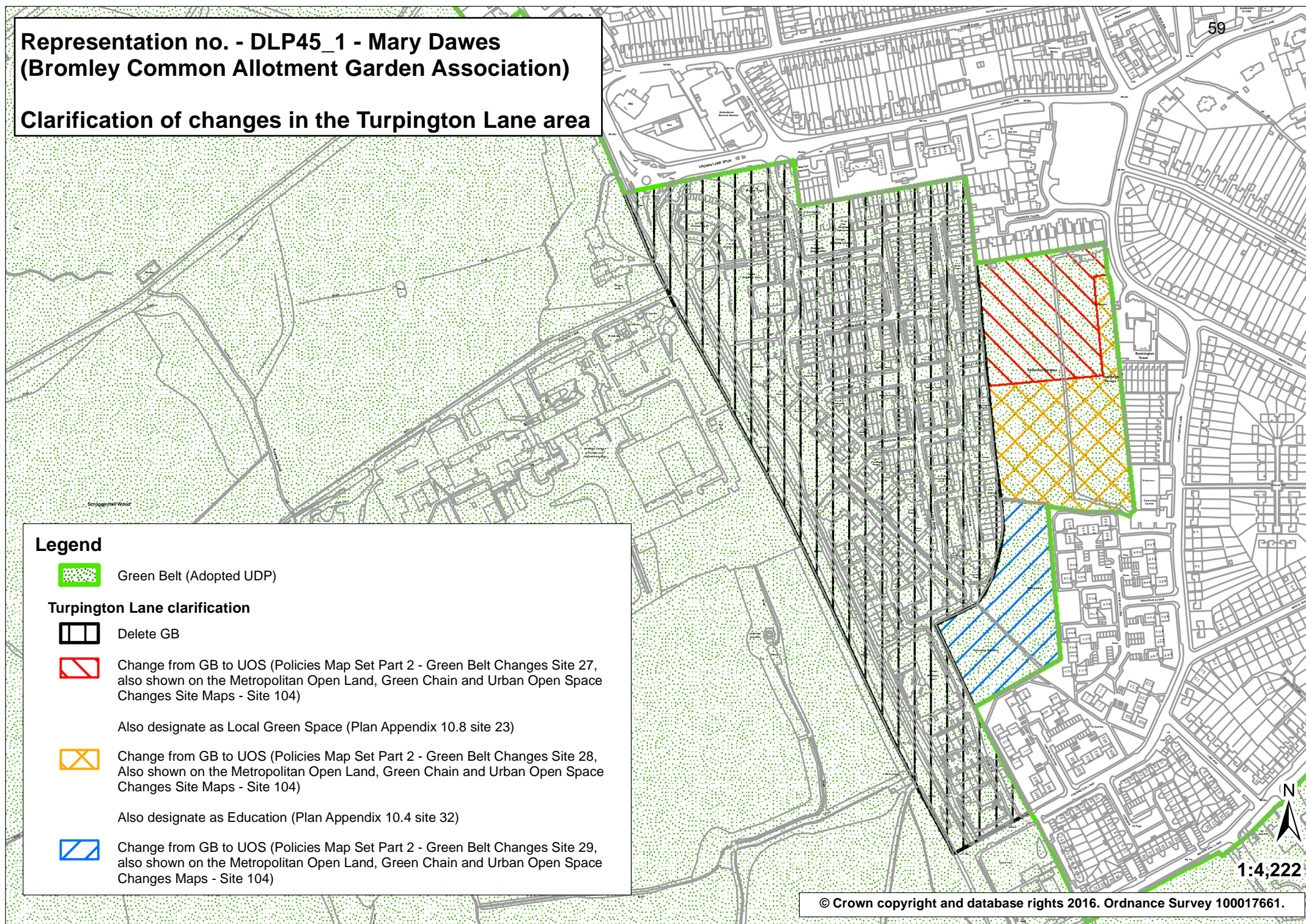
		<p>recommend that Scheduled Monuments are marked as this is an effective way to highlight their statutory protection.</p> <p>3. The boundary of the Renewal Areas is not shown and it is not possible to compare the areas shown in the map in para 2.3.7 of the local plan with conservation areas, historic parks and gardens or other heritage asset designations.</p> <p>4. Alterations to Green Belt and MOL are referenced in 5.2.10 and 5.2.14 of the plan. However, Policies Map Set, Part 2, does not provide the justification for these changes.</p>	<p>map the policy would have to apply to them as they are designated outside the Local Plan process.</p> <p>In the case of 1 and 2 above, there are policies in the plan relating to them, they were not shown on the UDP proposals maps, but it is considered that this omission should be corrected in the Local Plan and regarded as a 'minor amendment'.</p> <p>3. The 'renewal areas' are not defined in detail, this map is only intended to be indicative and at present there is no intention to be more precise.</p> <p>4. The approach adopted by the Council as far as the changes to open space designations are concerned was set out on the first page of the 'Suggested Changes to GB Boundary' document (Context of the Review) which was a supplementary document associated with the Draft Policies and Designations Consultation.</p>	<p><u>the Local Plan Maps</u></p> <p><u>Minor modifications.</u></p> <p>3. No modification</p> <p>4. No modification</p>
--	--	---	--	--

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

Clarification of changes in the Turpington Lane area

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

Clarification of changes in the Turpington Lane area




Legend


 Green Belt (Adopted UDP)

Turpington Lane clarification


 Delete GB

 Change from GB to UOS (Policies Map Set Part 2 - Green Belt Changes Site 27, also shown on the Metropolitan Open Land, Green Chain and Urban Open Space Changes Site Maps - Site 104)

Also designate as Local Green Space (Plan Appendix 10.8 site 23)

 Change from GB to UOS (Policies Map Set Part 2 - Green Belt Changes Site 28, Also shown on the Metropolitan Open Land, Green Chain and Urban Open Space Changes Site Maps - Site 104)

Also designate as Education (Plan Appendix 10.4 site 32)

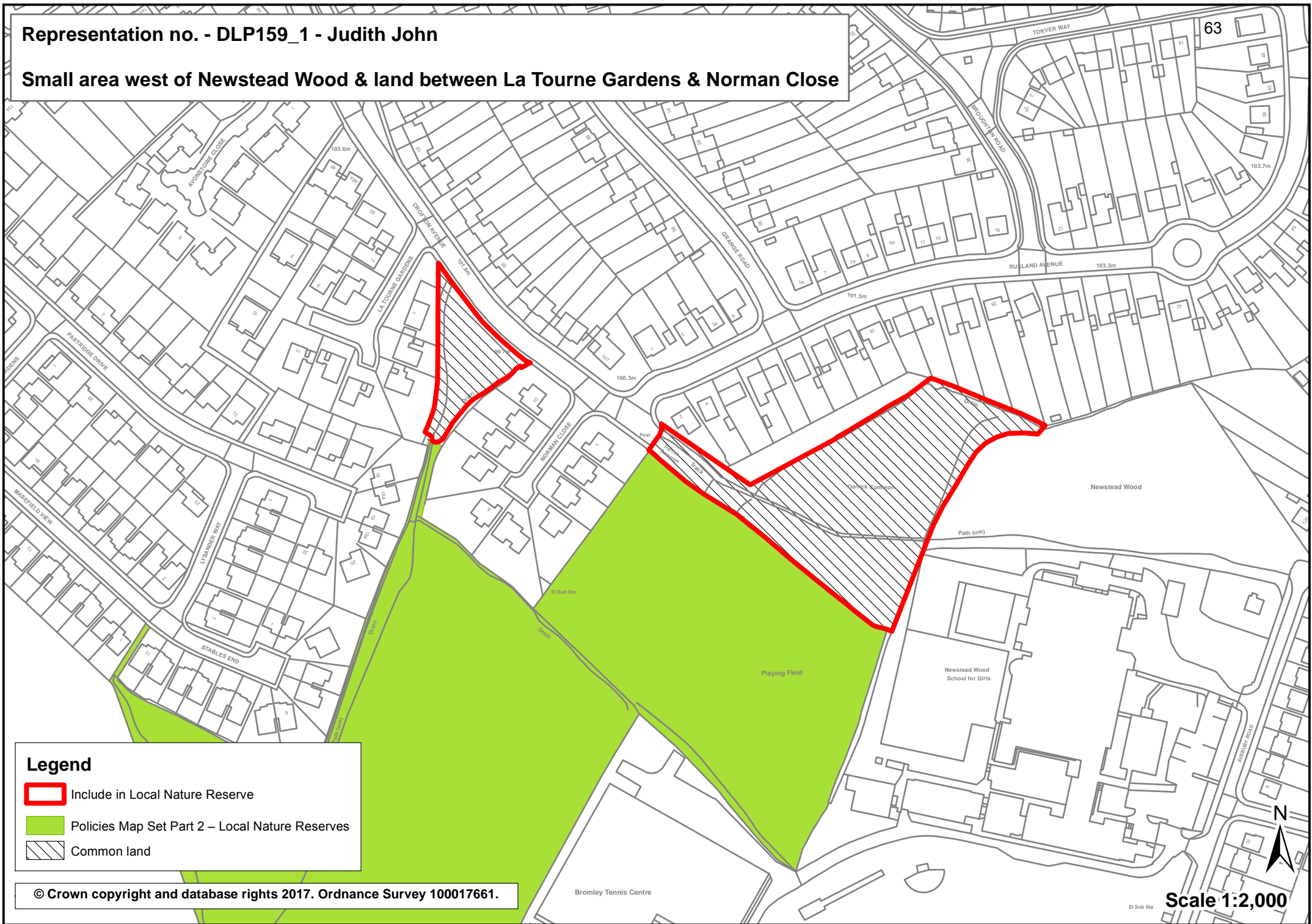
 Change from GB to UOS (Policies Map Set Part 2 - Green Belt Changes Site 29, also shown on the Metropolitan Open Land, Green Chain and Urban Open Space Changes Maps - Site 104)

Representation No. - DLP159_1 - Judith John




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

Representation no. - DLP159_1 - Judith John

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



Legend

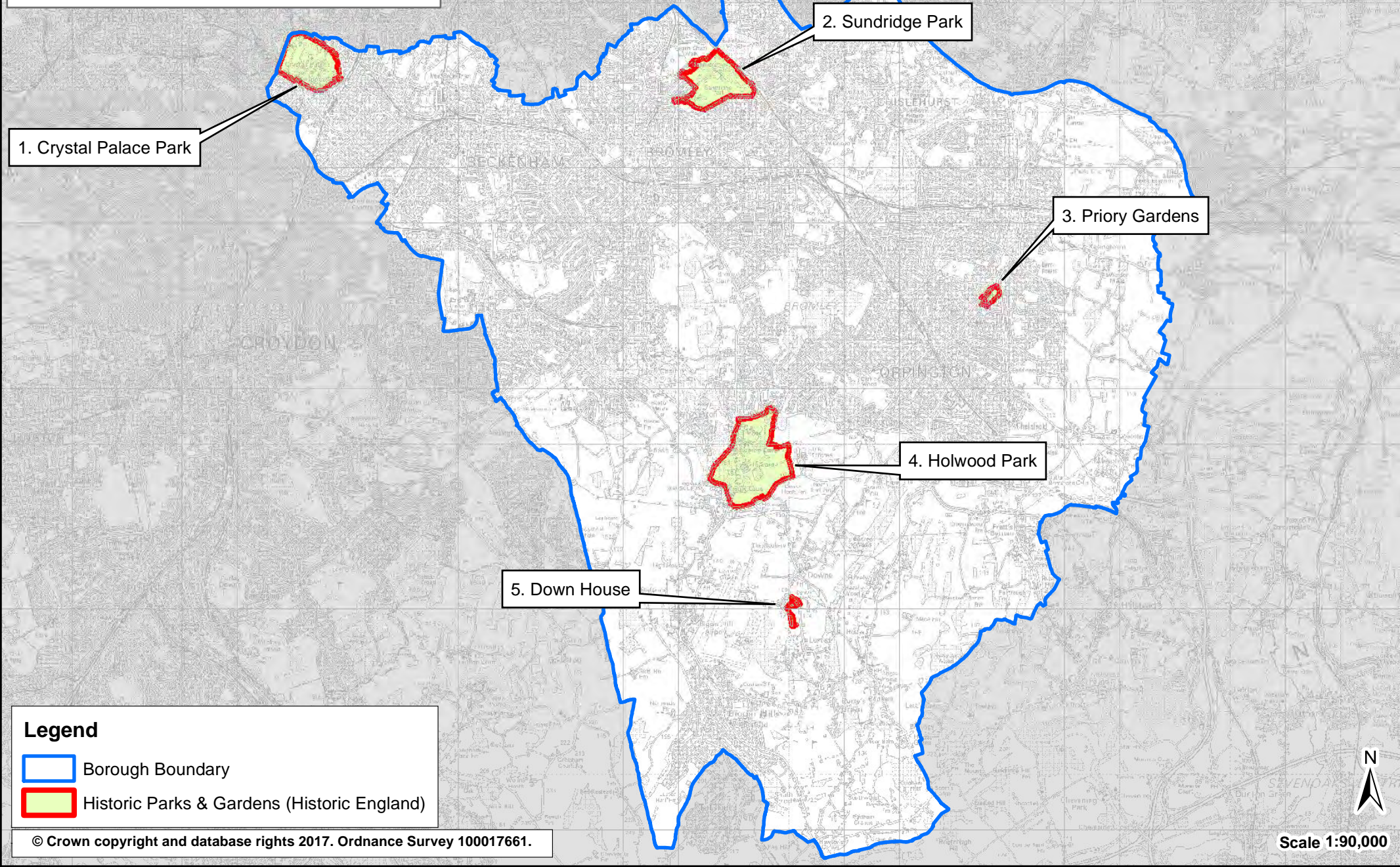
-  Include in Local Nature Reserve
-  Policies Map Set Part 2 – Local Nature Reserves
-  Common land

**Representation no. - DLP193_18 - Katharine Fletcher,
Historic England**



**National Register of Parks and Gardens of Special Historic
Interest**

Representation no. - DLP193_18
Katharine Fletcher, Historic England

Key to Historic Parks and Gardens Maps

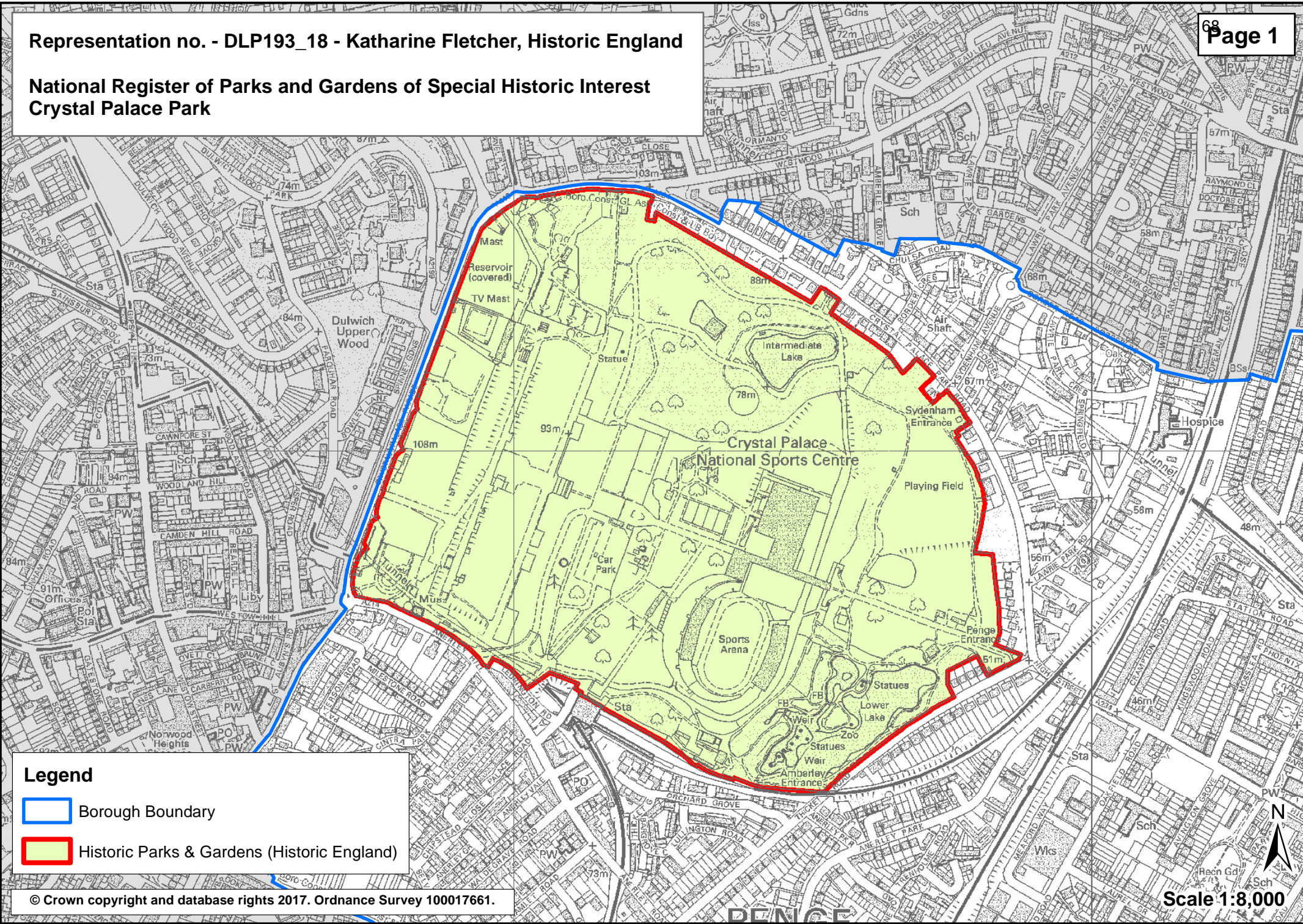


Legend



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

Representation no. - DLP193_18 - Katharine Fletcher, Historic England

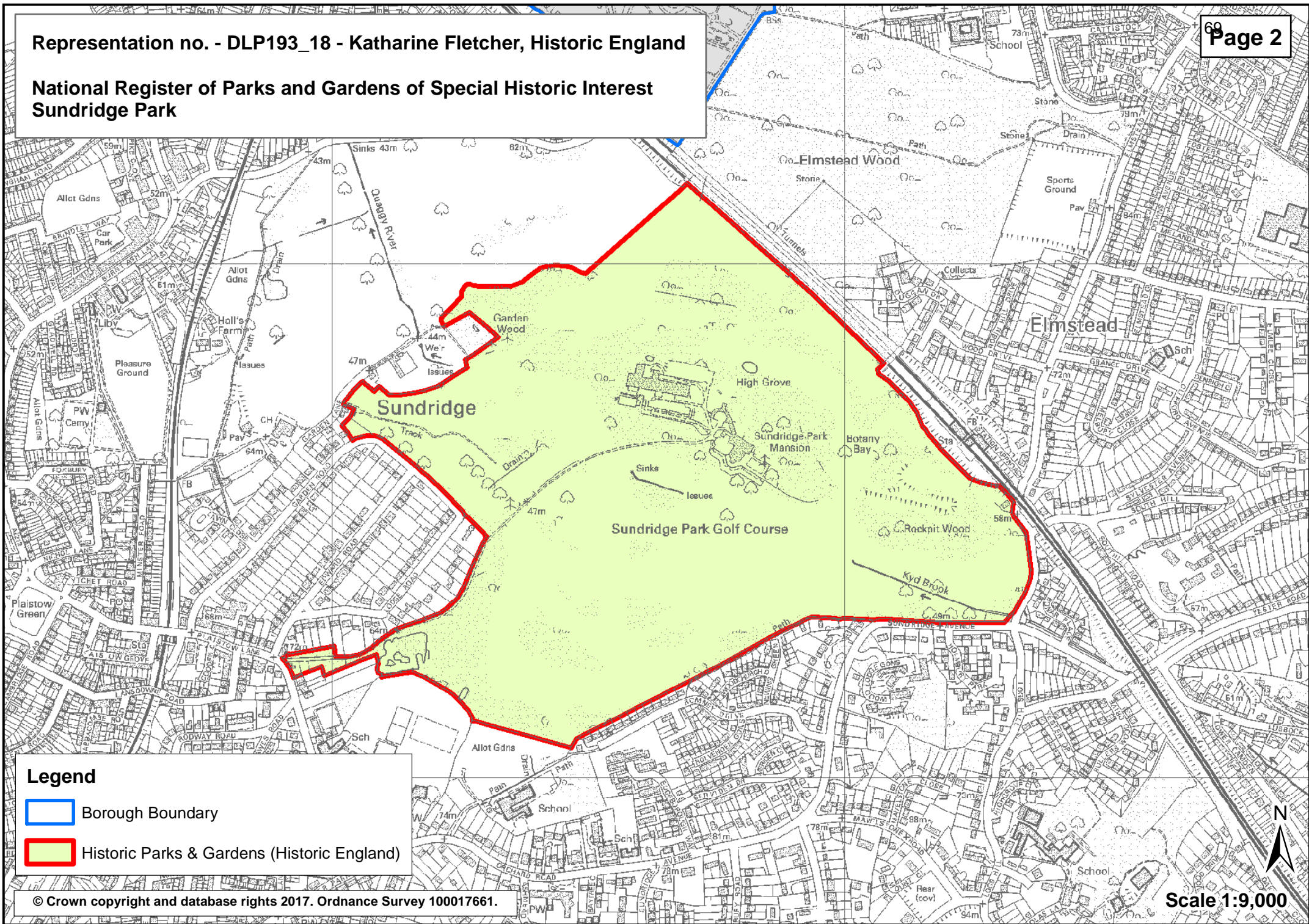
National Register of Parks and Gardens of Special Historic Interest
Crystal Palace Park





Legend

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

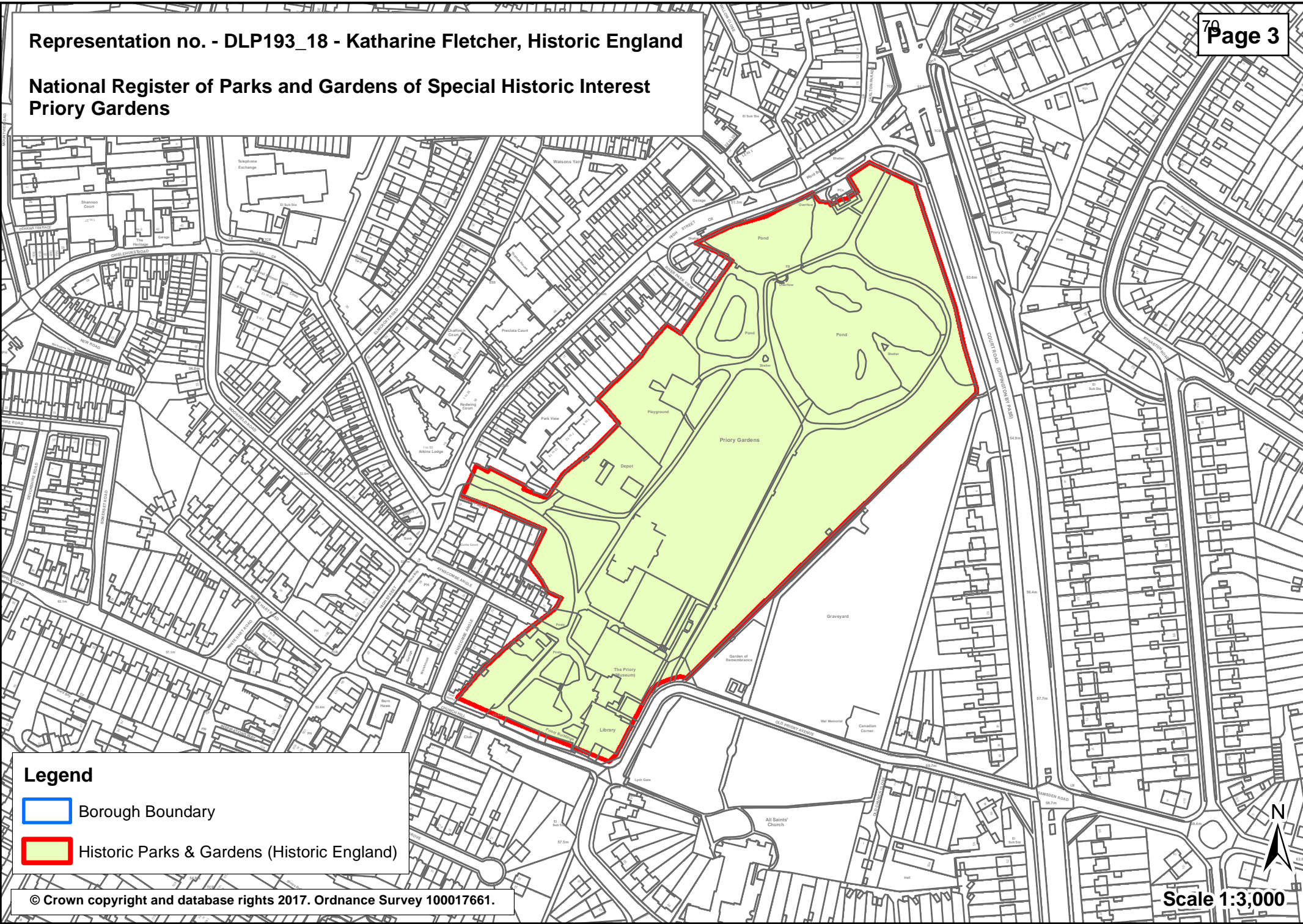
National Register of Parks and Gardens of Special Historic Interest
Sundridge Park





Legend

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

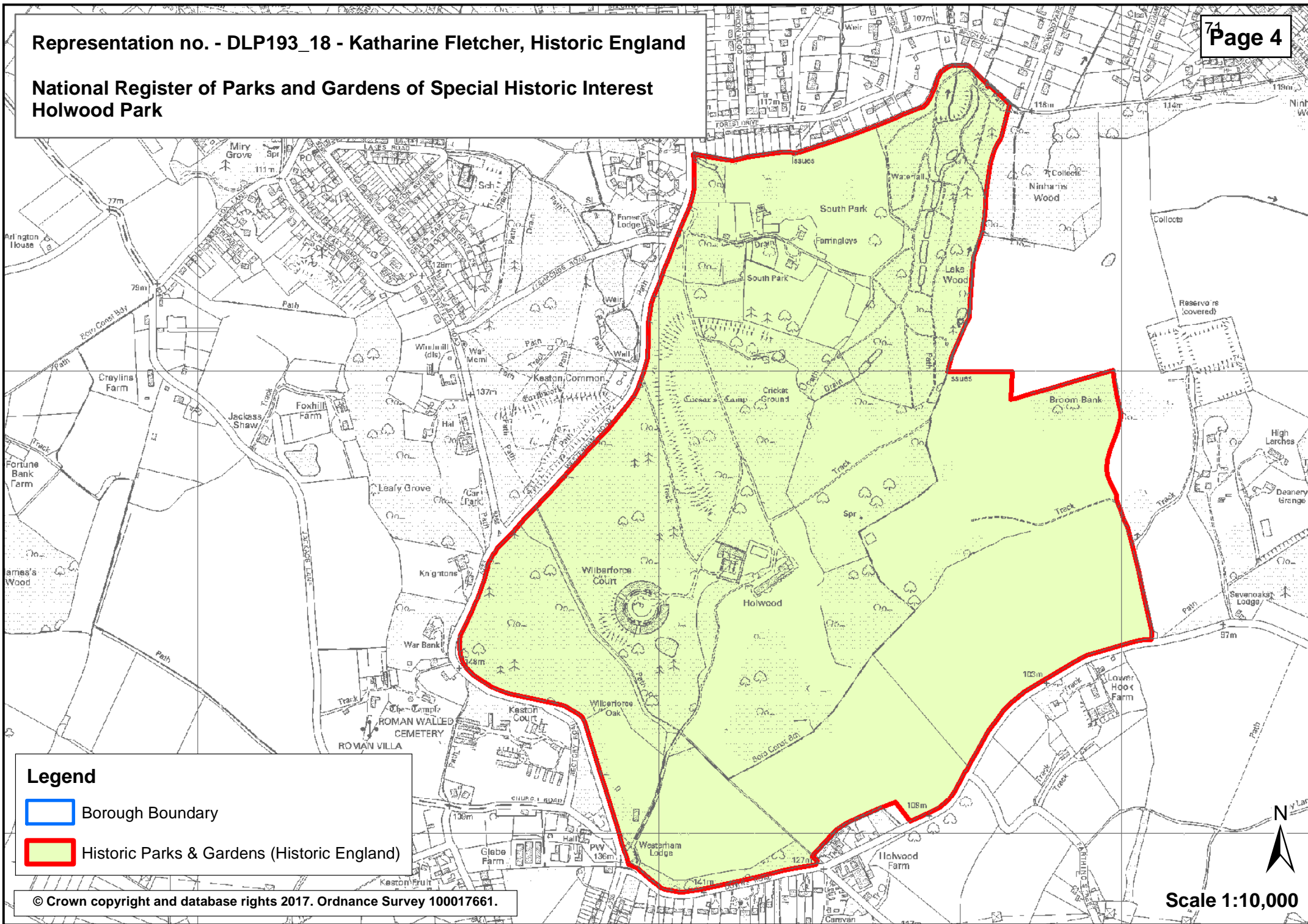
National Register of Parks and Gardens of Special Historic Interest
Priory Gardens





Legend

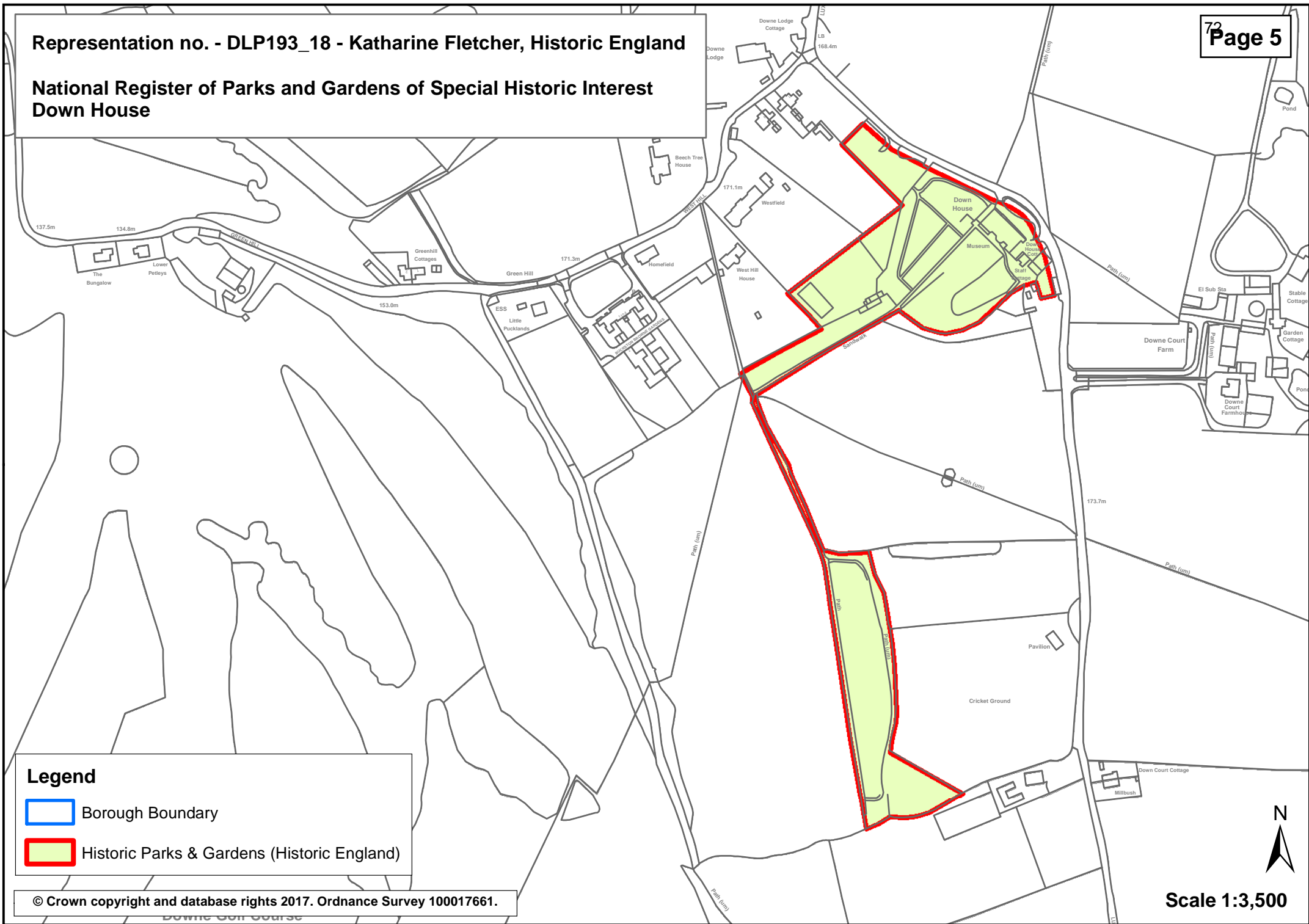
-  Borough Boundary
-  Historic Parks & Gardens (Historic England)

National Register of Parks and Gardens of Special Historic Interest
Holwood Park





Legend

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



Legend

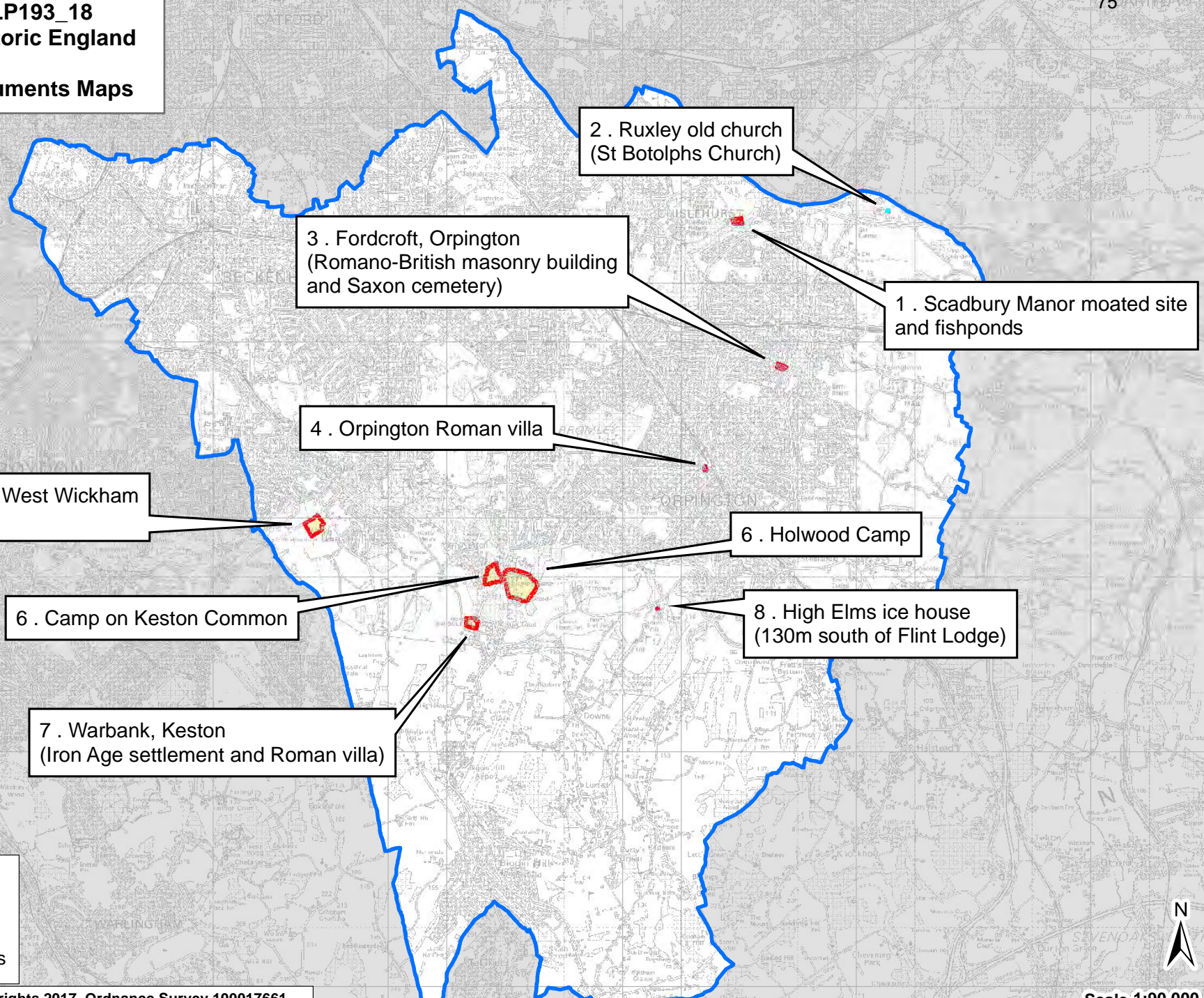
-  Borough Boundary
-  Historic Parks & Gardens (Historic England)

**Representation no. - DLP193_18 Katharine Fletcher,
Historic England**

Scheduled Monuments

Representation no. - DLP193_18
Katharine Fletcher, Historic England

Key to Scheduled Monuments Maps



2 . Ruxley old church
(St Botolphs Church)

3 . Fordcroft, Orpington
(Romano-British masonry building
and Saxon cemetery)

1 . Scadbury Manor moated site
and fishponds

4 . Orpington Roman villa

5 . Wickham Court Farm, West Wickham
(Romano-British site)



6 . Holwood Camp

6 . Camp on Keston Common

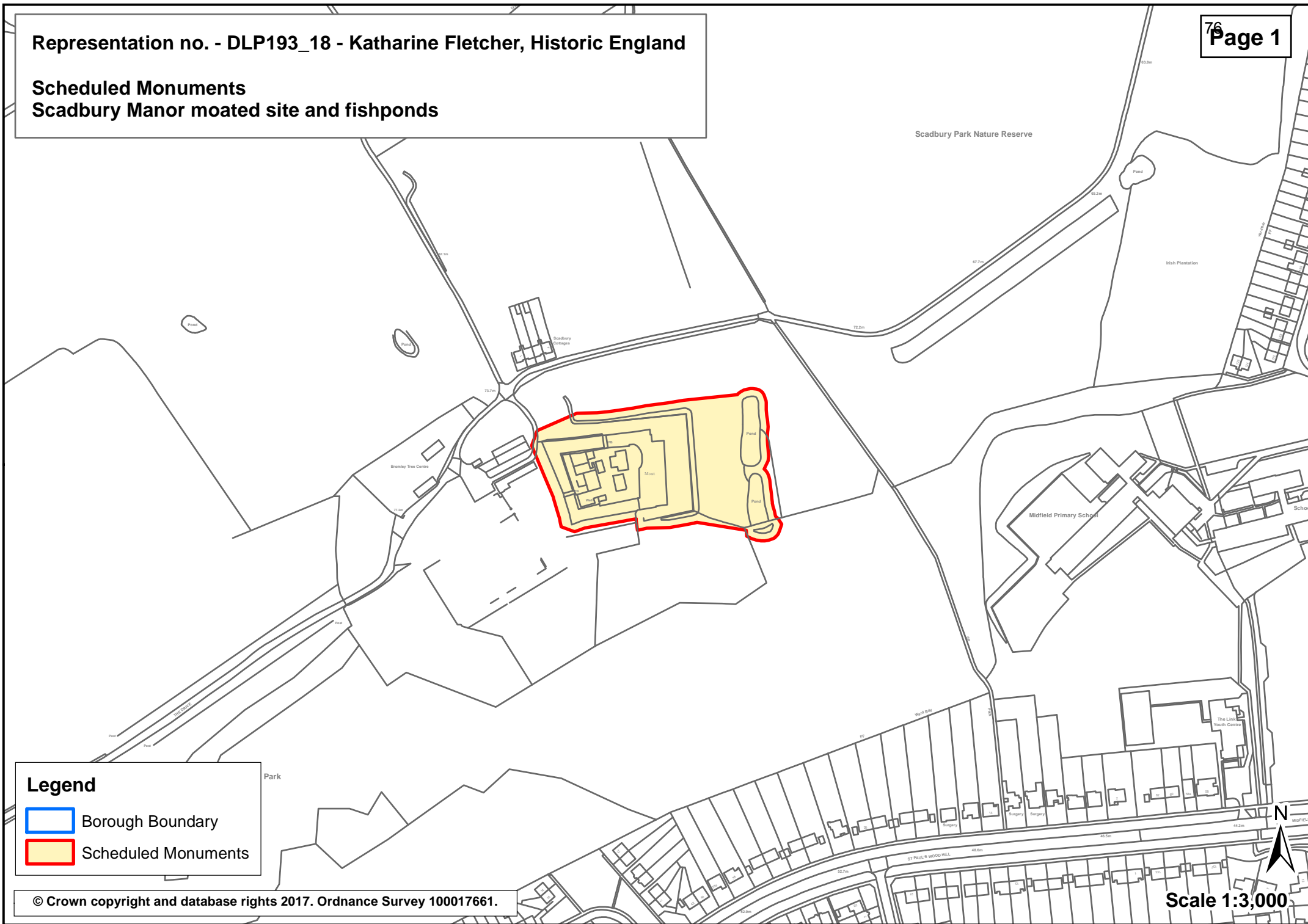
8 . High Elms ice house
(130m south of Flint Lodge)

7 . Warbank, Keston
(Iron Age settlement and Roman villa)



Legend

-  Borough Boundary
-  Scheduled Monuments

Scheduled Monuments
Scadbury Manor moated site and fishponds



Legend



-  Borough Boundary
-  Scheduled Monuments

Representation no. - DLP193_18 - Katharine Fletcher, Historic England

Scheduled Monuments
Ruxley old church (St Botolphs Church)

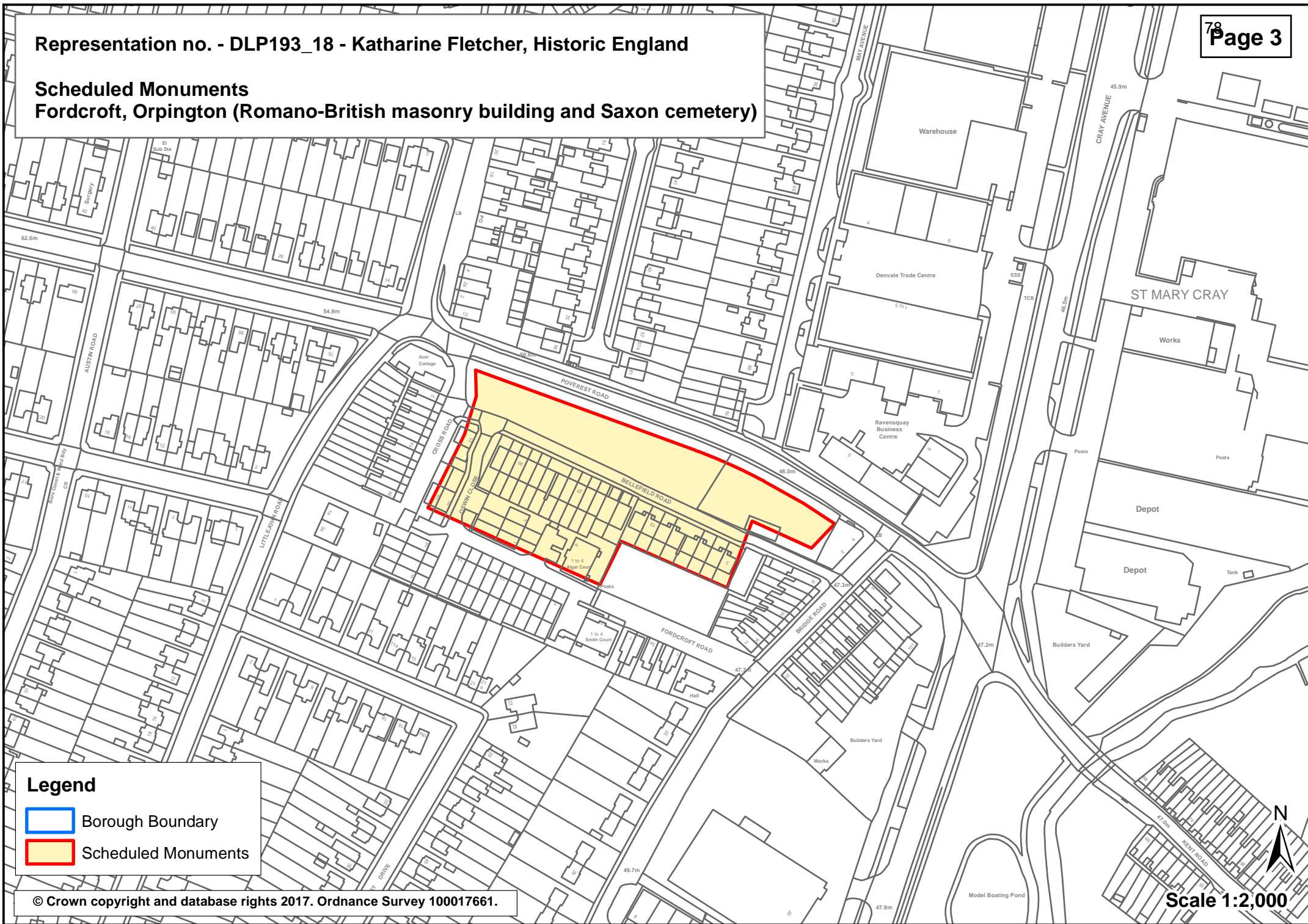


Legend



-  Borough Boundary
-  Scheduled Monuments

Representation no. - DLP193_18 - Katharine Fletcher, Historic England

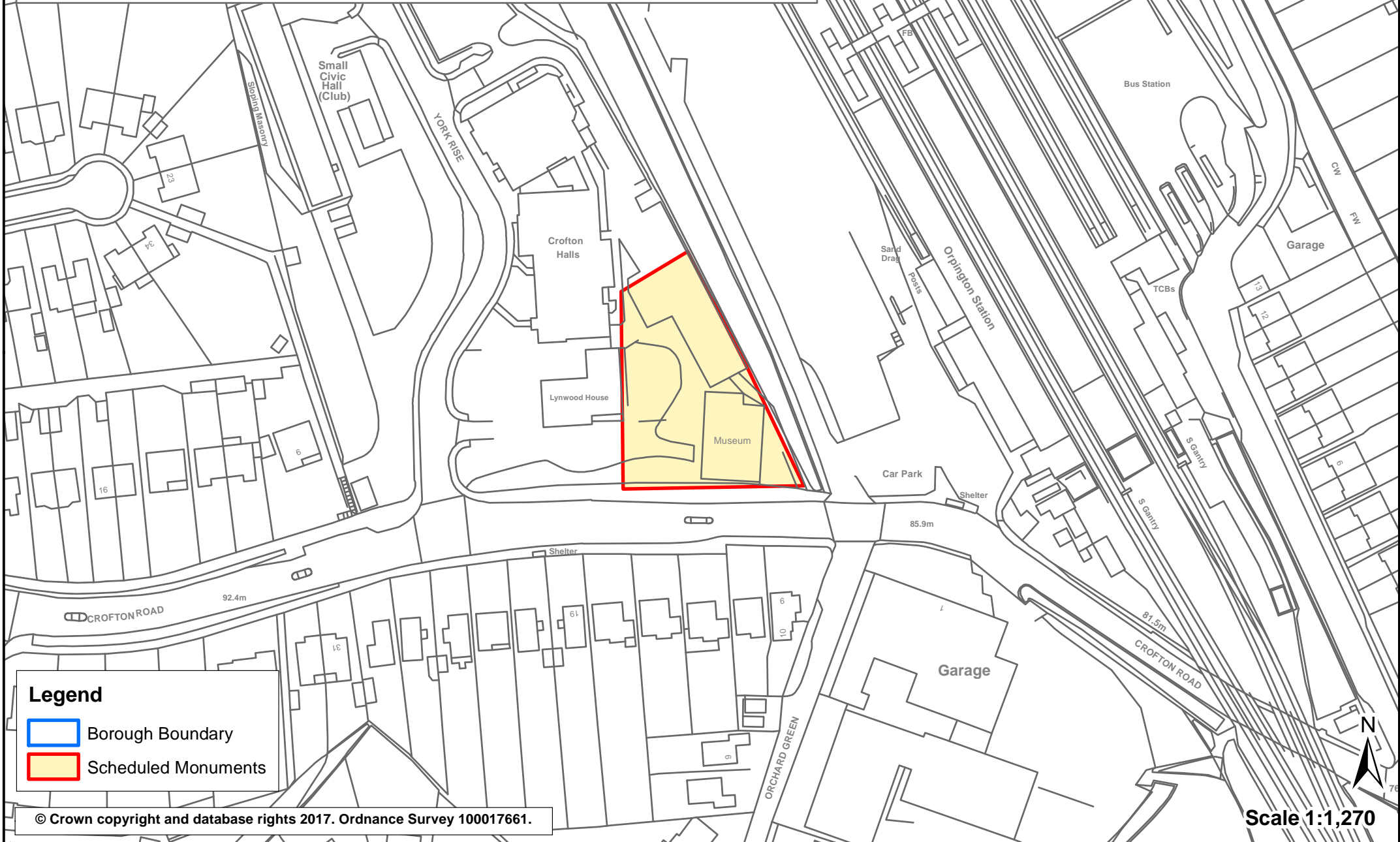
Scheduled Monuments
Fordcroft, Orpington (Romano-British masonry building and Saxon cemetery)





Legend

-  Borough Boundary
-  Scheduled Monuments

Scheduled Monuments
Orpington Roman villa

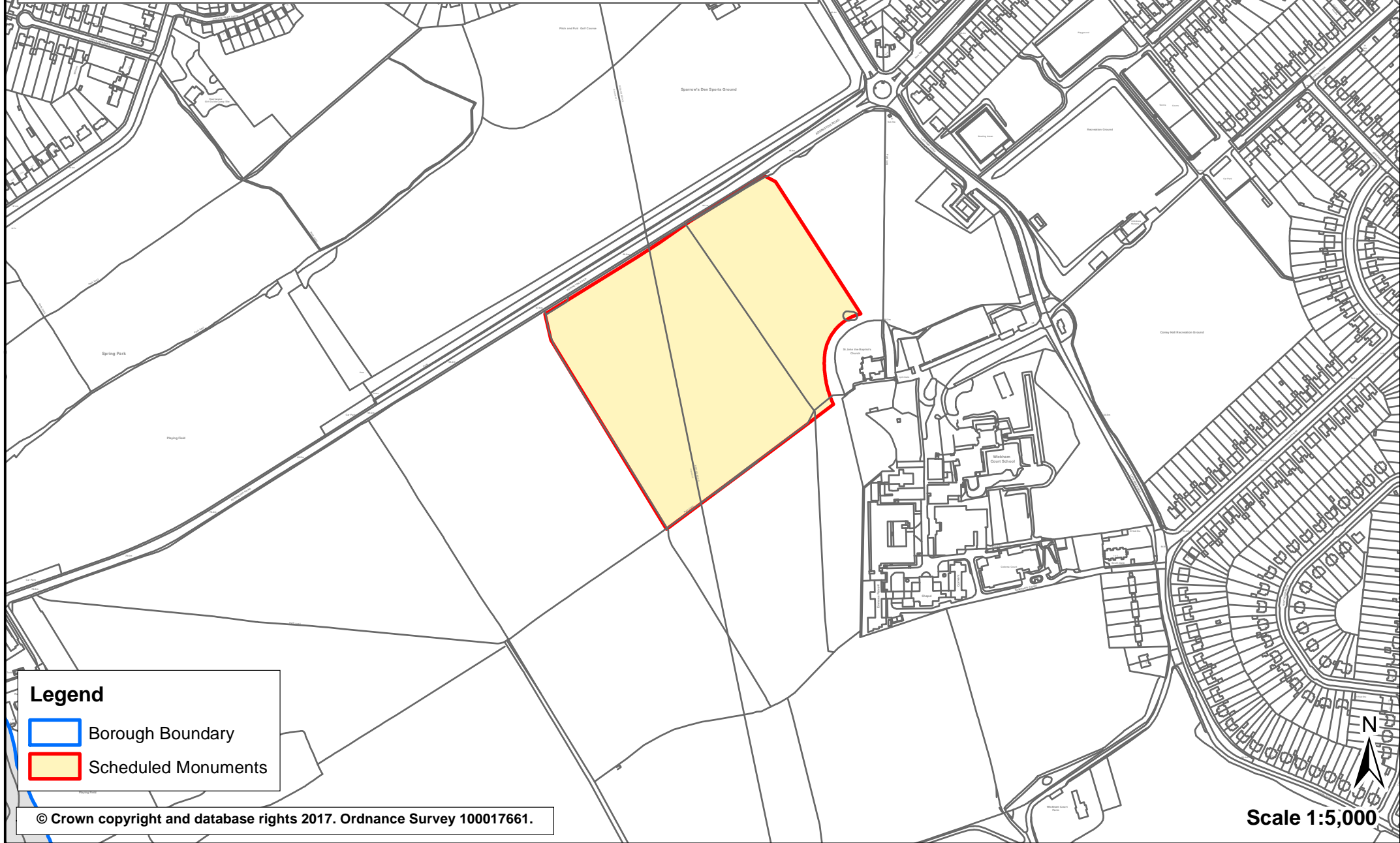


Legend



-  Borough Boundary
-  Scheduled Monuments

Representation no. - DLP193_18 - Katharine Fletcher, Historic England

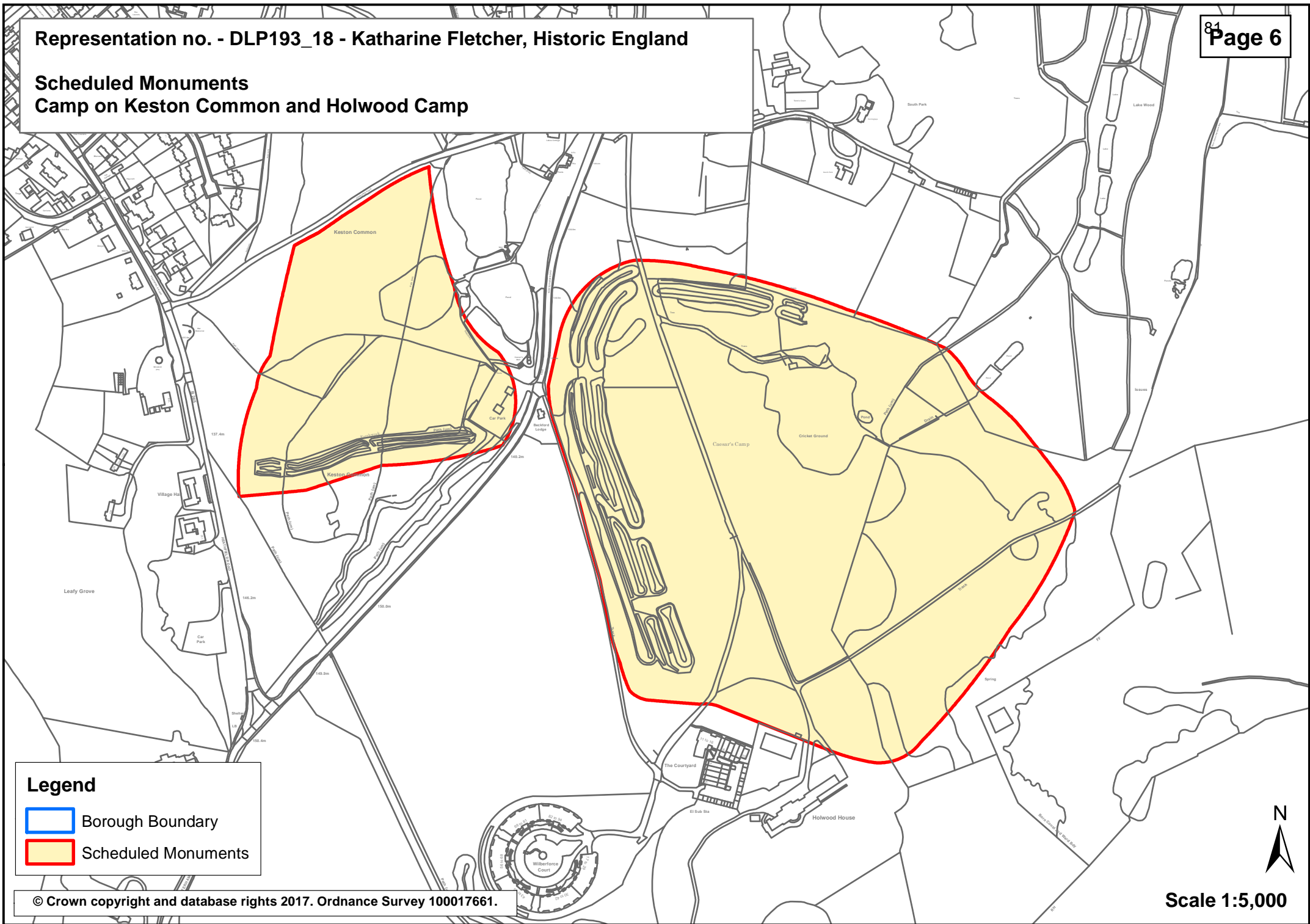
Scheduled Monuments
Wickham Court Farm, West Wickham (Romano-British site)





Legend

-  Borough Boundary
-  Scheduled Monuments

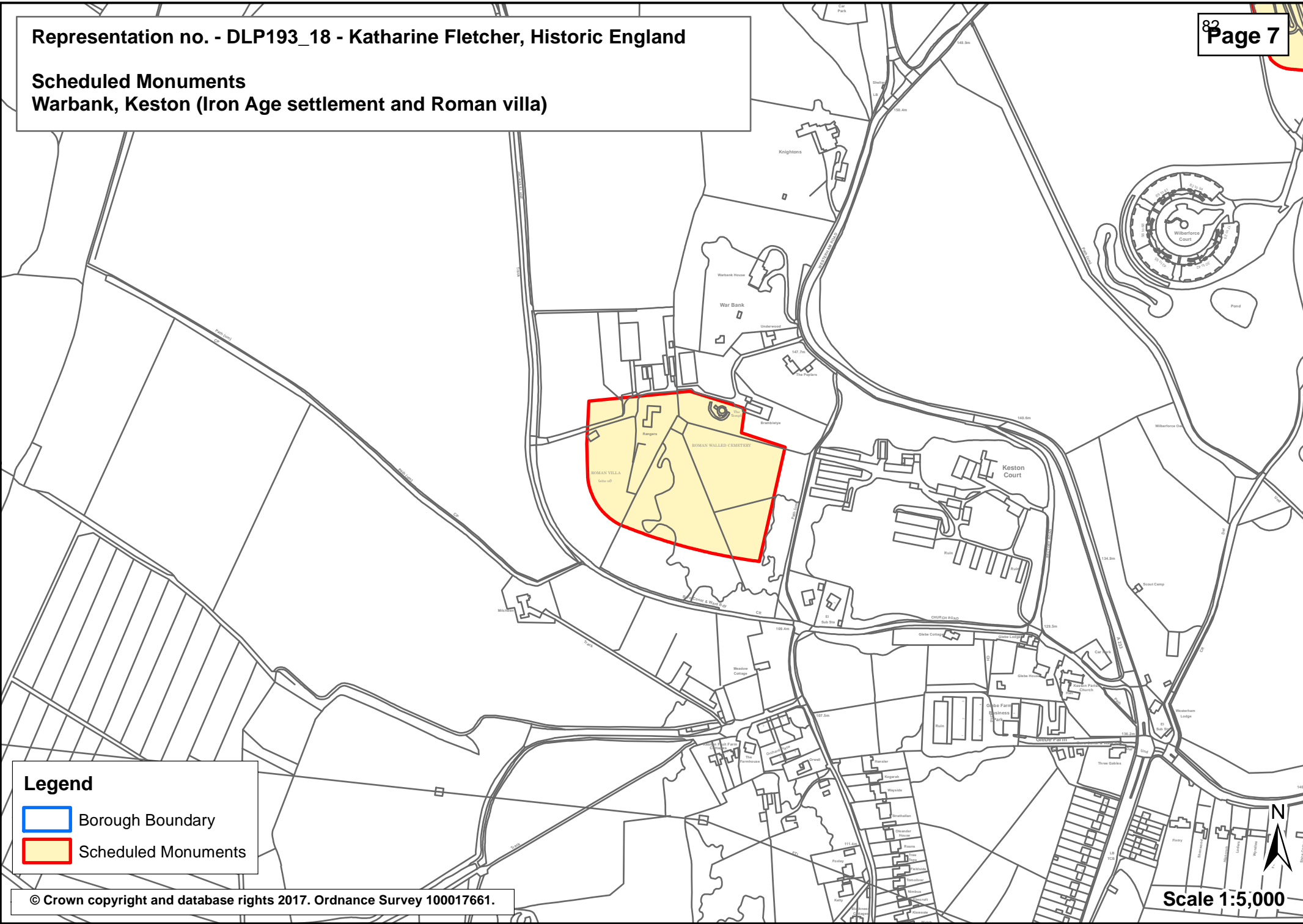
Scheduled Monuments
Camp on Keston Common and Holwood Camp





Legend

-  Borough Boundary
-  Scheduled Monuments

Scheduled Monuments
Warbank, Keston (Iron Age settlement and Roman villa)



Legend

-  Borough Boundary
-  Scheduled Monuments

Scheduled Monuments
High Elms ice house (130m south of Flint Lodge)

