

# APPENDIX 1

## Bromley Draft Local Plan – Suggested Modifications arising from Hearings requiring ratification by members

Section	Suggested Modification	Reason for proposed change
<p><b>Draft Policy 1 Supporting text</b></p>	<p>Insert paragraph 2.1.5a</p> <p><u>The trajectory at Appendix 10.1 (and Table 1) shows that the Council has identified a 10,645 housing supply over the 15 year plan period, compared with a minimum housing supply, based on 641 dwellings per annum, of 9615. This trajectory is therefore consistent with the London Plan Policy 3.3, including its clauses Da and E. It does so first by seeking to supplement the London Plan minimum housing target of 641 per annum with extra housing capacity to close the gap between identified housing need and supply, a total of 1030 dwellings over the plan period. It also does so by drawing upon the brownfield housing capacity of the sources set out in Policy 3.3(E), such as an Opportunity Area and town centres.</u></p>	<p>Suggested modification arising from the Hearings, clarifying how the Local Plan will seek to close the gap between the London Plan minimum target and housing need.</p>
<p><b>Draft Policy 2 – Affordable Housing</b></p>	<p>See Attachment showing suggested amendments to Policy 2 and supporting text</p>	<p>Suggested modification updating the Policy in light of new housing initiatives and funding, as discussed at the Hearings.</p>
<p><b>Draft Policy 15 - Crystal Palace, Penge &amp; Anerley Renewal Area</b></p>	<p>Proposals within the Crystal Palace, Penge &amp; Anerley Renewal Area will be expected to <del>maximise</del> <u>take advantage</u> of opportunities:</p> <p>a – to <del>maximise contributions</del> <u>contribute</u> to, and benefits from the thriving cultural and leisure economy, which has evolved in the Crystal Palace District Centre and, in the Crystal Palace Strategic Outer London Development Centre;</p> <p>b – <del>to</del> <u>which create benefit to the wider area by contributing to the conservation and enhancement of Crystal Palace Park through development</u></p>	<p>Modification as requested by, and agreed with Historic England during the Hearings.</p>

**APPENDIX 1**

	<p><u>that respects its character area and ensures a positive relationship with natural and heritage assets.</u> <del>presented by the enhancement of, and development within, Crystal Palace Park, consistent with its heritage values and significance, and for the benefit of the wider area, and</del></p> <p>c - to support renewal in Penge Town Centre.</p>	
<p><b>Draft Policy 23 Public Houses</b></p>	<p>3.1.33 ... This would involve demonstrating evidence of <del>six</del> <u>twelve</u> months' suitable marketing activity which is current and robust, and proof that the public house is no longer financially viable through an independent professional valuation.</p> <p>3.1.34 Redundant pubs will also be required to comply with the Community Facilities Policy and hence <u>should the 12 month marketing period as a public house not be successful, a further during the 6 months of marketing for alternative community uses, as set out in para 3.1.8, will subsequently be required.</u> <del>there should be consultation with relevant Council departments and third party providers to establish whether any community groups or service providers have expressed both a need for the site and are interested in buying or leasing it.</del></p>	<p>Suggested modification to increase the marketing period in response to representations at the hearing from Bromley CAMRA highlighting the marketing periods in other London Boroughs (see below) and requesting 18 months marketing as a public house.</p> <p>London Boroughs Neighbouring</p> <ul style="list-style-type: none"> <li>• Croydon 18 months</li> <li>• Lambeth 12 months</li> <li>• Lewisham 36 months</li> <li>• Greenwich 24 months</li> <li>• Southwark 24 months (also Art 4 directions)</li> </ul> <p>Waltham Forest require a 12 month marketing period as a public house followed by a further 12 month period of marketing for alternative community</p>

**APPENDIX 1**

<p><b>Draft Policy 85 Office Clusters</b></p>	<p>Policy Paragraph 2 to read:</p> <p><del>Where existing offices can be demonstrated to no longer meet the needs of occupiers, redevelopment for Class B1(a) uses will be permitted following recent, active marketing of the site for reuse undertaken prior to the submission of a planning application over a minimum period of six months. Redevelopment proposals should <u>will be expected to reprovide at least</u> the same <u>quantum level</u> of office floorspace.</del></p> <p>6.1.27 <u>There has been a significant loss of office space within the Borough attributed to Permitted Development Rights (PDR) for conversion of offices to residential use.</u> The pressure on offices for other uses is recognised in Policy 4.2 of the London Plan, where boroughs are encouraged to monitor the impacts of <del>Permitted Development Rights (PDR)</del>, and where appropriate protect, renew, and modernise existing office stock in viable locations to improve quality and flexibility.</p> <p>6.1.28 <del>There has been a significant loss of office space within the Borough, with the trend expected to continue.</del> It is important to <u>maintain</u> ensure an adequate supply of good quality office accommodation <del>is retained</del> to accommodate new and existing business and plan for the forecast growth over the Plan period.</p>	<p>uses.</p> <p>Suggested modification to provide further clarity to policy and supporting text in response to representations at the hearing from G L Hearn.</p>
<p><b>Draft Policy 108 East Camp</b></p>	<p>Make the following amendment to the Policy text:</p> <p><del>Land</del> <u>Existing Buildings</u> in the Biggin Hill SOLDC <u>area</u> identified as East Camp will be safeguarded for aviation-related employment generating uses.</p> <p>The Council will not support any proposals in this identified area that would have an unacceptable adverse impact on land identified as a Site of Importance for Nature Conservation or on landscapes and residential areas in the vicinity of the SOLDC.</p>	<p>Modification suggested by the Inspector arising from discussion at the Hearings.</p>

## APPENDIX 1

<p><b>Site 1 – Bromley Civic Centre</b> (Policy in Draft Local Plan Appendix, p257)</p>	<p>Add text to the end of the final sentence:  “...the Urban Open Space (Local Green Space), <del>and</del> Site of Importance for Nature Conservation <u>and listed buildings</u>”</p>	<p>Suggested modification to reference the listed status of buildings in response to representations at the hearing from Bromley Civic Society.</p>
<p><b>Site 3 - Hill Car Park.</b> (Policy in Draft Local Plan Appendix, p260)</p>	<p>Add text:  “Development for mixed use including retail (150sqm), <u>cultural facilities</u> car parking <u>for the public and for residential</u> and 150 residential units”</p>	<p>Suggested modification to specifically reference cultural facilities within the inclusive list of uses and to provide clarity on the car parking element of the policy. In response to representations at the hearing by Bromley Civic Society.</p>
<p><b>Site 10 – West of Bromley High Street</b> (Policy in Draft Local Plan Appendix, p270)</p>	<p>Add bullet point:</p> <ul style="list-style-type: none"> <li>• “<u>Be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site</u>”</li> </ul>	<p>In response to representations at the hearing to clarify the requirement for a masterplan in response to representations at the hearing by Bromley Civic Society.</p>
<p><b>Appendix 10.1</b> (Draft Local Plan, p254)</p>	<p>Amend “Changing retail patterns (200) to Changing retail patterns (290)</p>	<p>Correction to ensure the total figure for Broad Locations is consistent with those listed in the first column of the Appendix.</p>

## APPENDIX 1

<b>Modifications (shown in bold) to the Submitted Modifications (SD20)</b>		
<b>Draft Policy 48 Skyline</b>	Para 5.1.21: “Views will need to be considered to ensure intrusive elements are not introduced whether in the foreground, middle ground or background through <del>the appropriate</del> <b>a visual impact</b> assessment.”	Suggested modification to provide clarity on the nature of assessment, arising from the Hearings.
<b>Minor Modification</b>		
<b>Appendices</b>	Inclusion of the list of Replacement Policies in an Appendix	Suggested modification to provide clarity arising from the Hearings.

## Draft Policy 2

### Provision of Affordable Housing

In order to meet the needs of the Borough, the Council will :

a) seek affordable housing ~~will be sought~~ on all housing developments capable of providing 11 residential units or more or where the residential floorspace is more than 1000sqm, irrespective of the number of dwellings.

On all sites at, or above, this threshold, negotiations will take place to determine the number of affordable dwellings to be provided. In negotiating the amount of affordable housing on each site, the Council will seek 35% provision with 60% social-rented/affordable rented housing and 40% intermediate provision, unless it can be demonstrated that a lower level should be sought or that the 60:40 split would not create mixed and balanced communities. The affordability of different elements of the scheme should not immediately be apparent from the siting, design and layout.

The affordable housing should be made available for transfer or occupation before a certain proportion (to be determined through negotiations between the Council and developer) of the market housing is occupied.

Where an applicant proposes a level below the 35%, or the tenure mix is not policy compliant, the Council will require evidence within a Financial Viability Appraisal that will be independently assessed.

b) seek to maximise the use of housing grants and other funding to increase the level of affordable housing above the figure secured in a)

c) support the delivery of affordable housing through other sources of supply, such as estate regeneration, bringing vacant units back into use and other forms of housing which demonstrate they can help meet need.

### Payments in lieu

Where it has been determined that a site meets the size threshold and is suitable for affordable housing, payment in-lieu of affordable housing on site or provision in another location will be acceptable only in exceptional circumstances and where it can be demonstrated that:

- it would be impractical to transfer the affordable housing to a registered provider (RP); or
- on-site provision of affordable units would reduce the viability of the development to such a degree that it would not proceed; or
- on-site provision of affordable units would not create mixed and balanced communities and there would be benefit in providing such units at another location.

The Council 's Planning Obligations Supplementary Planning Document will provide detail to assist in the interpretation and implementation of this policy.

### **Add to supporting text**

Government and the Mayor are introducing new initiatives to address housing need and the Council will take into account these and new housing products which can demonstrate they can address housing need. The Council's Housing Strategy will set out the Council's corporate approach to address housing need, and the wide range of initiatives which contribute to this objective.

The Council will consider positively new forms of provision such as Build to Rent and discounted build to rent where the rent levels can be shown to be affordable to local residents and help increase choice and address need