

Bromley Council's Proposed Response to the London Borough of Bexley's Draft Local Plan Regulation 18 'Preferred approaches to planning policies and land-use designations' consultation paper (2019)

Bromley Council welcomes the opportunity to comment on the London Borough of Bexley's consultation on the Local Plan preparation: Preferred approaches to planning policies and land-use designations (Regulation 18 consultation paper, February 2019).

As several studies are being prepared in support of Bexley's Emerging Local Plan, and detailed policy responses to this evidence base are not yet available, Bromley will not be able to fully respond on matters of potential cross-boundary significance at this stage.

Housing Supply

The Council notes Bexley's acknowledgement that its London Plan housing target is expected to rise significantly upon the Mayor's adoption of the new London Plan, anticipated in Autumn 2019. Bromley has strongly objected to the draft London Plan's housing targets and strategic assumptions underpinning them. The Council has made representations to the draft London Plan Examination in Public in respect of the housing target for Bromley and in particular the impact of the small sites target.

Bromley notes that the Regulation 18 consultation paper contains assessments of over 100 sites received through Bexley's 'call for sites'. In the absence of a completed Strategic Housing Market Assessment and Housing Strategy though, and ahead of the adoption of the new London Plan, it is unclear whether some of these sites will be reassessed, or new sites considered, to take into account the outcomes of these documents once finalised. No concerns are raised regarding the policy wording approach contained in this consultation paper, however the Council welcomes any opportunity to comment further on this matter once these completed studies and Bexley's policy response to them are available.

Gypsies and Travellers Accommodation

Similarly, Bromley does not raise any issues with Bexley's preferred approach to gypsies and travellers accommodation, however the completion of its SHMA will provide a clearer picture of potential cross-boundary implications for Bromley.

Employment land

As both boroughs share part of the Foots Cray Strategic Industrial Location (SIL) identified in the London Plan, employment land provision is an ongoing matter of cross-borough importance. Bexley's preferred industrial policy approach is largely consistent with the current London Plan and Bromley's Local Plan. It updates terminology of its designated areas to include SIL and Locally Significant Industrial Locations and uses a SIL policy approach similar to Bromley's corresponding Local Plan Policy 81. This approach is supported in principle.

It is noted that Bexley also makes specific allowance for office development in its section of the Foots Cray SIL, in addition to safeguarding this land for industrial use. This approach recognises existing uses but also presents different scenarios for growth in this area. Although Bromley notes Bexley's ongoing Employment Land Review and acknowledges that this review will inform the next stage of the Local Plan preparation, it also notes that Bexley's 2017 Growth Strategy identifies capacity for 1,000 new jobs in the Foots Cray locality, with expected densification on current sites. It is not presently clear how much development Bexley expects in the Foots Cray SIL and what proportion of this is expected to be office rather than industrial or storage and distribution-based development.

Further, whilst the current London Plan assigns the lighter SIL sub-category of Industrial Business Park to Foots Cray and Ruxley Corner SIL, the draft London Plan omits this sub-category and discourages office development in industrial areas. In this regard, any encouragement to intensify office development in this area would be inconsistent with the draft London Plan. The Council welcomes any opportunity to provide further detailed comments on this matter following Bexley's completion of its Employment Land Review.

Bromley notes that several sites adjacent to or in close proximity to the Bromley boundary are included in the site assessments. One site, the B&Q and DFS site at the north-west edge of the A20, Sevenoaks Way and Edgington Way roundabout junction, is proposed to be designated as new SIL land. This site currently contains retail warehouse uses and so there is an inconsistency with the London Plan SIL Policy (2.17). However, it is accepted that the land is closely aligned with the neighbouring SIL land and its designation for industrial purposes could deter further out of centre retail expansion.

The Council notes that Bexley proposes to promote land around Sidcup Station to Local Centre status (in addition to retaining Sidcup District Centre to the south). This new designation could help to relieve out of centre retail pressures on the Cray Business Corridor, but may also have infrastructure-related implications. Bromley requests that Bexley's evidence base considers any potential implications for the road network to the south of the proposed Local Centre.

Areas for regeneration

The Council acknowledged Bexley's general support for the identification of Cray Valley, which adjoins the Bexley boundary, as a Renewal Area in Bromley's Local Plan. The current and draft London Plans recognise this land, as well as some land in Bexley borough, as Strategic Areas for Regeneration. However, it is noted that Bexley has not given specific local policy recognition to this land. Clarification is sought as to whether Bexley intends to defer to the London Plan policy (currently Policy 2.14), rather than preparing a local policy on this matter.

Green infrastructure

Bromley acknowledges that Bexley is currently preparing a Green Infrastructure Study and has at this stage adopted a protective stance towards its existing green space designations. Bexley's approach of not redesignating sites assessed containing Green Belt or Metropolitan Open Land, including several in close proximity to the Bromley boundary, is supported. However, clarification is sought as to whether any of these sites will be revisited following completion of needs assessments currently underway and in the event that these studies confirm a need for further allocations or redesignations.

Transport infrastructure

It is noted that Bexley proposes to review its current transport infrastructure safeguarding and identify potential new areas in its proposals map at Regulation 19 consultation stage. Bromley also notes that the potential densification of out of centre office uses in Foots Cray SIL may have an impact on the local road network and parking near and across the shared borough boundary. Bromley welcomes any opportunity to comment further on the outcomes of Bexley's review and its detailed policy approach.

Social infrastructure

Bromley notes that Bexley has not yet allocated any sites or identified any specific need for social infrastructure in the vicinity of Bromley's boundary at this stage of the Local Plan preparation. The Council also acknowledges that a local assessment of overall need for educational facilities across the borough is to be carried out, which will inform the designation and protection of educational land on the proposals map at Regulation 19 consultation stage. Bromley welcomes the opportunity to respond to any matters of cross-boundary significance as they arise at the next consultation stage.

Bromley looks forward to continue engaging with the London Borough of Bexley in relation to cross-borough strategic matters as part of the Duty to Co-operate in the future.