

Note on Land Designation of Y Blocks

The land on which the Y Buildings are situated was designated Urban Open Space in the 2006 Bromley Unitary Development Plan and is shown as such in that Plan. Subsequently in the adopted Bromley Area Action Plan 2010 this area was shown as an Opportunity Site for housing.

In the draft Local Plan, the various changes to the boundaries of designations were undertaken at an early stage of the Local Plan process and the maps covering this (which went forward as part of the collection forming the Submission Draft) formed part of the "[Local Plan Draft Policies and Designations Consultation](#)" in February and March 2014, and the maps were included under the Supporting Documents. The site was not included as a deletion at this point, as the Council had not yet decided on its more detailed strategy for the Civic Centre and thus the specific decision to remove the UOS designation from the Y Buildings was not made. Once that decision had been made at Executive in May 2016, it is understood that it was too late to amend the detailed maps, however it is clear that there was no secret about the proposal to redevelop the land for housing.

Everything relating to this site's designation as a housing site was incorporated in Appendix 10.2 of the Local Plan, and it is made clear that the part of the Civic Centre site marked B and including the Y Buildings forms part of a housing proposal, and the area marked C which is currently open space will be retained as a park and designated as Urban Open Space, Local Green Space and Site of Importance for Nature Conservation.

[Appendix 10.2 Housing Site Allocations Site 1](#)

This was approved by Development Control Committee and subsequently the [Executive on 20th July 2016](#) to be included as part of the Submission Draft Local Plan. The pertinent sections are pages 18, 36, 40, 230 and 231 of the agenda. The report to Executive included tables summarising the representations received during emerging local plan consultations (2014 draft policies and designations and 2015 draft allocations, further policies and designations) together with the officer comments. The relevant pages are 386, 387 and 497 to 499.

[The inspector considered the Allocation sites in her report](#) (para 25), her comment on the Civic Centre was as follows:

"25. Site 1 (Civic Centre) is a large site, the central area of which would be redeveloped for about 70 housing units at relatively low density, but complying with the London Plan density matrix. The site is highly constrained but the proposals have been designed to minimise any potential adverse impacts, including those on Urban Open Space (UOS) and the Site of Importance for Nature Conservation (SINC) in the park to the south and east. The Old Palace is Grade II listed, although there would be sufficient open space left around it to preserve its setting, and there is no

evidence to suggest that a suitable scheme could not be designed within the Old Palace itself. As such, I consider that the significance of the heritage asset would not be harmed and that 70 units would be achievable on the site. However, MM007 is required to ensure that the site policy properly addresses the need for the protection of listed building, in accordance with national policy. The Council have resolved to dispose of the site, although there was no planning permission on it at the time of the examination. However, it is put forward for development in years 6-10 and I consider that it could be delivered within that period.”

Consequently no changes were made to any designations or boundaries and the plan went forward to adoption.

In summary the site is not within Urban Open Space in the 2019 Local Plan and this is clearly shown on the Proposals Map is available online at https://www.bromley.gov.uk/downloads/file/5068/local_plan_maps_page_7. It is appreciated that the site wasn't shown in the initial hatched plans, however there was not any intention to mislead about the intentions for the site - the Council was very clear for a long period about its proposal to redevelop the site for housing (see the Allocation Site 1 in the Local Plan as set out above, and also as far back as the Bromley Area Action Plan adopted in 2010), and the recent Local Plan Inspector was clearly aware of this. The Local Plan process gave every opportunity for representations to be made about the use of the site for housing. The UOS designation would have obviously conflicted with this designation, and it was clear that the site's removal from UOS was required for the allocation site to work as set out.