

Decision Maker: EXECUTIVE

**FOR PRE-DECISION SCRUTINY BY THE RENEWAL,
RECREATION AND HOUSING POLICY DEVELOPMENT AND
SCRUTINY COMMITTEE AND DEVELOPMENT CONTROL
COMMITTEE**

Date: DCC: 20 May 2021
RRH: 16 June 2021
Executive: 30 June 2021

Decision Type: Non-Urgent Executive Key

Title: DESIGNATION OF SHORTLANDS VILLAGE CONSERVATION
AREA AND EXTENSION OF BROMLEY TOWN CENTRE
CONSERVATION AREA

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Ward: Bromley Town; Shortlands; Copers Cope

1. Reason for report

- 1.1. This report recommends the designation of the Shortlands Village Conservation Area and an extension of the Bromley Town Centre Conservation Area. The proposed boundaries were informed by an independent assessment and were subject to public consultation between August and October 2020. Details of the representations received and how these representations have been addressed are set out in the report.
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2. RECOMMENDATIONS

- 2.1. That Development Control Committee endorse the designation of the Shortlands Village Conservation Area (shown at Appendix 1) and the extension of the Bromley Town Centre Conservation Area (shown at Appendix 2).**
- 2.2. That Members refer the matter to the Renewal, Recreation and Housing Policy Development and Scrutiny Committee for pre-decision scrutiny.**
- 2.3. That Executive approve the designation of the Shortlands Village Conservation Area (shown at Appendix 1) and the extension of the Bromley Town Centre Conservation Area (shown at Appendix 2).**

Impact on Vulnerable Adults and Children

1. Summary of Impact: No impact
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Corporate Policy

1. Policy Status: Not Applicable
 2. BBB Priority: Regeneration Quality Environment
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Financial

1. Cost of proposal: Costs associated with designation will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: N/A
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2021/22
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Personnel

1. Number of staff (current and additional): 1
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: Non-Statutory - Government Guidance
 2. Call-in: Not Applicable
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Procurement

1. Summary of Procurement Implications: N/A
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: officers have discussed the proposed conservation area boundary with members from each of the three wards. Officers discussed the key representations made and the proposed officer response to these; and the proposed recommendations noted above. Ward members were supportive of the proposed boundary except for the inclusion of the golf club. Members did not consider that the club house had any historic or architectural merit and considered that the inclusion of the golf course was not justified and would result in additional bureaucracy for the golf club. See further discussion in the report.

3. COMMENTARY

Background

- 3.1. In July 2020, Development Control Committee¹ approved a public consultation exercise to seek views on the proposed Shortlands Village Conservation Area. The proposed boundary was informed by a detailed character assessment prepared by independent external consultants - Built Environment Advisory & Management Service (BEAMS). The assessment is provided at Appendix 4. The assessment identified potential options for designation, including an option involving designation of a new Conservation Area and an extension to the existing Bromley Town Centre Conservation Area.
- 3.2. Consultation on the proposed Shortlands Village Conservation Area was undertaken between 3 August and 19 October 2020. All properties within the proposed Conservation Area, and those in close proximity to the boundary, were sent a letter and questionnaire. Details of the consultation were also available on the Council's website alongside an online survey. The consultation exercise sought views on the proposal to designate the conservation area, the content of the BEAMS assessment, and the proposed options for designation.

Consultation responses

- 3.3. A total of 166 representations - 9 written responses and 157 survey responses - were received, from local residents, residents groups, Historic England and other organisations. Of those representations which stated agreement or disagreement with the proposal, 129 (87%) agreed with the proposed designation (96 of which strongly agreed) and 19 (13%) disagreed (15 of which strongly disagreed). Common reasons put forward by respondents who disagreed with the proposal included the suggestion that the proposed Conservation Area was waste of money, that it put in place unnecessary restrictions which would restrict development and that it had no specific architectural character.
- 3.4. 18 representations did not express an opinion about the proposed designation.
- 3.5. With regards to the common issues noted above raised in the representations, it is acknowledged that the Conservation Area will lead to additional restrictions for properties within the area, but it is considered that the area is justified on merit, as set out in the BEAMS report and in line with legislation (which states that areas with special historic or architectural interest should be designated as conservation areas).
- 3.6. Comments in support of the proposed area were received from Historic England (HE). HE considered that *"the BEAMS report sets out a well-researched argument for designation and the significance of Shortlands Village as a Victorian suburb which sought to provide a healthier and attractive environment for the rapidly growing industrial and artisan workforce."*
- 3.7. HE's comments concluded by welcoming the proposal to designate the Shortlands Village Conservation Area, and expressed support for the proposals as set out in the BEAMS report. HE consider the larger suburban villas which line the southern side of Queens Mead Road to be representative of a different historic story which would fit more appropriately to the proposed extension of the Bromley Town Centre Conservation Area (option B) rather than inclusion in the proposed Shortlands Village conservation area.
- 3.8. In addition to comments supporting or objecting to the proposal, a number of suggestions were received for additions to the Conservation Area and for the removal of some areas from the

¹ 'SHORTLANDS VILLAGE CONSERVATION AREA', Development Control Committee 14 July 2020, available from: <http://cdslbb/documents/s50082507/SHORTLANDS%20VILLAGE%20CONSERVATION%20AREAPART%201%20REPORT%20TEMPLATE.pdf>

proposed boundary. Details of these suggestions, any justification put forward to support them and the LBB response to the suggestions are summarised in Table 1 below.

Table 1: details of suggested changes to proposed Shortlands Village Conservation Area, from representations received

Respondent	Summary of comments	LBB response
Shortlands Golf Club	<p>The Shortlands Golf Club response includes a letter from chairman of the Shortlands Golf Club Board of Trustees and a report from HCUK, a heritage consultant, which sets out reasons why the golf club should not be included in the boundary.</p> <p>Letter from chairman of the SGC Board of Trustees - Stress care that they take in maintaining their Golf Course, including natural stewardship of the property for benefits of members and the wider environment. Note club have their own environmental officer to advise on environmental issues. Care taken is demonstrated by range of wildlife and fauna on the course.</p> <p>BEAMS report notes that 1970s Clubhouse is of little relevance to the Conservation Area in terms of any perceived architectural merit. SGC recently commissioned a detailed structural report to examine its continuing structural viability. The central conclusion is that it is sound and merely needs some renovation to bring it in line with more up to date materials and present a more modern setting for our membership. SGC are using an architect to ensure these are carried out sensitively to enhance its appearance.</p> <p>SGC refer to the golf club as a "precious little gem". They believe that present course management and environmental policy is more than adequate to protect the overall appearance and ecology of the area in relation to the proposed Conservation Area plan for the village itself. SGC strongly believe that this gives the new Conservation Area all the protection it requires without the need to embroil this 125-years old members' club in conservation control procedures and believe that the village itself should be the only focus for the conservation control. SGCs retained heritage consultant</p>	<p>The BEAMS report sets out the interest of the open spaces that surround Shortlands Village. The key point being made is that the green open spaces, of which the golf club is one part, are essential to the character and appearance of the area. Although there is a brief reference to the club house under architectural interest, the designation does not relate to the club house, rather it is included as a means of preserving the open space of the river valley and the contribution this makes to the character and appearance of the Shortlands railway village and preserving a link to the areas pre-suburban development.</p> <p>In the summary of character set out in BEAMS report, page 6, the green open character is described as follows:</p> <p><i>"The open land wrapping around what is in effect a railway village defines the built-up area and provides an attractive backdrop to the simple artisan streets. The setting on the river valley floor with views to the hills above on either side is also an important component of the character of the area. These green areas and their trees, in particular numerous fine specimen pine trees all contribute to the distinctive character of the village."</i></p> <p>...</p> <p><i>"The verdant setting of the railway village seen through long views at the ends of the roads and above the tops of the houses."</i></p> <p>The golf club is referenced in the BEAMS report, page 9, under Urban layout :</p> <p><i>"Large areas of the flood plane were developed as public open space for the village, to the north is Shortlands Golf Club while</i></p>

supports this view in his report (see HCUK comments below), which is submitted separately. SGC consider they are not, and never have been, integral to the village or its activities. In fact, only nine members are resident in the area under consideration and of those, three are Social Members, not golfers.

HCUK - report by HCUK sets out justification why the Golf Club should not be included in the proposed conservation area. The report sets out the history of the land occupied by the Golf Club, including statement that *"It goes without saying that the present Clubhouse (partially illustrated in the BEAMS report) is not a building of any architectural interest."*

The report then assesses the land owned by the golf club, noting that there is nothing in the history or physical structure of the Golf Club that would lead one to suppose that it could possibly be described as an area of special architectural or historic interest. It goes on to discuss other potential components of heritage significance, concluding that there is no evidence that Shortlands Golf course is of archaeological interest, artistic interest or communal interest. The report goes on to note that there is no evidence that the Golf Club is of any heritage significance and that it is certainly not of special interest.

The report sets out relevant policy and legislation for context. It recognises that Local planning authorities have considerable latitude when deciding what is special when designating conservation areas; and that many large conservation areas contain pockets that are not of special interest. However, it is considered in this case, the inclusion of a linear tract or finger of land within a conservation area, containing a Golf Course, is a different matter. If it clearly fails the test of special interest, there is a risk of the decision being so irrational that the Courts might consider a challenge to the designation.

to the south and east are Queen's Mead, the Valley School Recreation Ground and Martin's Hill Open Space"

The golf club is also referenced on page 10, under Open space, gardens and trees:

"A key feature of Shortlands Village is the manner in which it is encircled by the remaining open land of the river valley. This has now been tamed into the Shortlands Golf Course to the north and the Valley School Recreation Grounds, Queen's Mead Bowling Club, Queen's Mead and Martin's Hill to the south and east. The latter two are part of Bromley Town Centre Conservation Area and not part of this assessment

...

"The Shortlands Golf Club opens on to Ravensbourne Avenue on the east side and has a hedge running along its boundary and provides additional views of trees and greens beyond the car park. "

The conclusion of the BEAMS report notes:

"The setting of the village within the open spaces of the river valley is also key to the area's character. Some of this is already protected within the Bromley Town Centre Conservation Area. However, conservation area status would protect the Valley School Recreation Grounds, Queen's Mead Bowling Club and the Shortlands Golf Club (although this does have Metropolitan Open Space status) thereby preserving the boundaries of the village as it was originally conceived and protecting the open space for future generations."

We consider that the BEAMS report provides sufficient justification for the inclusion of the golf club within the conservation area.

The report refers to case law where a conservation area designation was quashed, and considers there are parallels in this case.

The report considers that the BEAMS report does not contain information that would be expected in a document appraising the character of a proposed conservation area; this includes Historic England best practice. The BEAMS report does not describe the character or appearance of the Golf Course in any detail, or say in what way its character or appearance might be architecturally or historically special, or research its historical development.

The report notes that the Golf Course has not been identified as a Local Green Space in the London Borough of Bromley's Local Plan, which itself calls into question why it should suddenly be said to be of such a high level of heritage significance. It considers that BEAMS should have spoken to golf club trustees to gain better understanding of issues, and that LBB should have given notice of public consultation to the golf club. No other examples of golf courses that might or might not have been included in conservation areas, or to the reasoning attached to those cases, has been provided.

The respondent sets out the risks for the golf club. The Trustees of Shortlands Golf Club are concerned that conservation area designation will increase the risk of the Club becoming unviable, and of the managed Golf Course becoming an unmanaged tract of land without a purpose. In examining these fears, reference is made to other clubs and sporting facilities that have been included or excluded within conservation areas, seeking parallels and comparisons. With regard to trees, the Trustees are concerned that conservation area designation would impose a further layer of bureaucracy on this process, which might cause delay in decision-making, and that it would introduce an external form of control based

The response from the golf club is really just a disagreement with the justification put forward in the report, rather than identification of any particular errors. It is worth noting that Historic England consider that the proposed area justifies conservation area designation; while the HE response does not go into specific detail about all elements of the area, the response has clearly been informed by a detailed reading of the BEAMS report and an understanding of the boundary proposed, which includes the golf club. The golf club's criticisms of the BEAMS report for not reflecting HE best practice are clearly not of significant concern to HE, given that no issues were raised by HE themselves.

The response raises a number of criticisms of the BEAMS report but we consider that these are unfounded. There is no set template for setting out the justification for a conservation area. The statutory requirement is that a conservation area should be designated where the local planning authority determines that an area has special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The BEAMS report sets out detailed discussion of the architectural and historic interest of the areas proposed to be included within the boundary. It is a proportionate assessment which provides sufficient justification in line with legislation and guidance. BEAMS are a very experienced heritage consultant who have specific expertise in preparing this type of report².

The case law cited in the representation – the Arndale case – is not considered to be relevant. This case involved a decision by a local planning authority to designate a conservation area one week after it was brought to their attention that a particular building was to be demolished. The area was not subject to any independent assessment or public consultation. The judgement considered that the intent of the designation was to preclude development of a particular building rather than to protect special architectural or historic interest of an area, as per the

² See examples on BEAMS website- http://www.beamsltd.org/about_us.html

more on the trees themselves than on a century of experience of running a Golf Club and designing its course. The Trustees are concerned that the imposition of an external layer of control over trees, from a body that has no track record in golf, could compromise safety. In the event of a conservation area being designated, the Council would exercise ultimate control over trees and thereby influence the detailed design of the course.

Reference is made to other golf clubs in conservation areas; If they are to be designated as conservation areas there must be compelling evidence that they are of special architectural or historic interest, and that it is desirable, in the public interest, to preserve them or enhance them. The overwhelming evidence is that golfing facilities have very rarely been considered in this way, and that conservation area designation is exceptional. When compared with other courses that have been wholly or partly included in conservation areas, Shortlands Golf Club falls so far below the bar that any proposition to bring it within a new conservation area cannot be substantiated. To include Shortlands Golf Course within a conservation area, when only the buildings and a small part of St Andrews Golf Club (the "Home of Golf") is included in a conservation area would be irrational.

In the event that Council Members seek to pursue such a designation, it is requested that contact is made with the Trustees to arrange an accompanied site visit, subject to current social distancing guidance, so as to see for themselves that the Golf Club is not an area of special architectural or historic interest.

legislative requirements. The circumstances with the proposed Shortlands Village Conservation Area are entirely different. The decision to designate the area has clearly not been expedited to preclude development of a particular building. The Council has carefully considered the proposed area, sought independent advice on the merits of this area, and then undertaken extensive consultation to seek views of local residents, organisations and other stakeholders.

The representation considers that as the golf club is not designated as a Local Green Space in the Local Plan, this calls into question why it should suddenly be said to be of such a high level of heritage significance. An LGS is not specifically a heritage designation, although historic significance can factor into justification for an LGS. The fact that an area was not designated as an LGS does not preclude future designation within a conservation area; they are wholly separate designations.

With regard to the comments on lack of engagement with the golf club prior to public consultation, there is no requirement for this (and indeed, no statutory requirement for public consultation at all). There was sufficient information about the golf club available to enable BEAMS to arrive at their conclusions, and the public consultation has enabled interested parties to make representations on the proposals.

The representation notes that no examples of other conservation areas with golf clubs are provided, but there is no requirement to do this. As noted above, BEAMS have assessed the area and we consider that the golf club warrants inclusion due to the contribution that the open space makes to the historic interest of the area.

It is acknowledged that the designation may result in impacts on the operation of the golf club, and this has been considered as a material consideration when determining whether to recommend designation of the proposed conservation area. However, the

		<p>representation does not specify these impacts in any great detail, and instead just states that it will result in additional bureaucracy, mainly relating to trees. While works to trees would be subject to a notification process where a conservation area is in place, this is not considered to be a significant impact³; proposals for re-designing the course which involve removing trees may need to factor in the six week notification process but this is not a particularly long timeframe. Where safety is an issue, it is noted that there is provision for dangerous trees to be removed without initial notification.</p> <p>It is acknowledged that conservation areas introduce additional requirements for many landowners within the proposed area. The question is whether the area justifies designation based on the requirements of legislation. We consider that the proposed boundary is justified, taking into account the conclusions of the BEAMS report.</p> <p>It is noted that there was some support for the inclusion of the golf club from residents and residents groups. Most responses were not substantiated with further details of why they supported the inclusion, although one representation noted that the golf club has a unique history and its grounds, including a section of the river Ravensbourne, offer a haven for wildlife.</p>
Residents; local residents group	Include the whole of Ravensbourne Avenue (adding western side north of Downs Hill up to the Farnaby Road junction).	The BEAMS report considers that only the western side of Ravensbourne Avenue up to Down Hill is justified for inclusion in the Conservation Area.
Residents; local residents group	Include Farnaby Road	Farnaby Road is not considered to be of sufficient special interest to warrant conservation area designation as it has been overly eroded. Other roads in the area are more worthy of inclusion by the BEAMS report, e.g. Ravensbourne Avenue and its grander leafier character with more detailed and decorative semi-detached housing, some of an impressive scale in large

³ Details on the process are available here: <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#Protecting-trees-in-conservation-areas>; https://ecab.planningportal.co.uk/uploads/1app/guidance/guidance_note-works_to_trees.pdf

		plots with wide gaps and views to the rear. The BEAMS report also refers to Ravensbourne Avenue as having considerable historic interest as it follows an ancient carriageway.
Residents; local residents group	Include the part of golf club north of Farnaby Road	The area examined in the report contains the core area of historic and special interest. The proposed suggestion is not considered to be appropriate for inclusion within the Conservation Area as it does not form part of this core area. This part of the golf club links more with the character of the Warren Avenue playing fields to the north rather than relating to the proposed Shortlands Village Conservation Area.
Residents; local residents group	Include Ravensbourne Avenue railway embankment	This location was left out in error – the BEAMS report does highlight that the embankment should be included due to the quality of the trees.
Residents; local residents group	Include Downs Hill up to the railway so it is contiguous with the existing Downs Hill Conservation Area.	The area examined in the report contains the core area of historic and special interest. The proposed suggestion is not considered to be appropriate for inclusion within the Conservation Area as it does not form part of this core area.
Residents	Remove Shelbey Court (corner of Farnaby Road and Beckenham Lane)	While Shelbey Court itself has little to no architectural interest, the inclusion of this corner relates to the trees and prominence of the site rather than the building, and to provide continuity up to 2 Farnaby Road and 14 Beckenham Lane. It is a sensitive corner in terms of impact on the character and appearance of the wider area and should therefore remain in the proposed Conservation Area.
Residents	Include a number of additional streets and buildings suggested for inclusion: <ul style="list-style-type: none"> • Bromley Gardens; • Bromley Crescent; 	The area examined in the report contains the core area of historic and special interest. The proposed suggestions are not considered to be appropriate for inclusion within the Conservation Area as they do not form part of this core area.

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| | <ul style="list-style-type: none">• the Victorian buildings on Ridley road and Gwyder Road;• include the section of Mays Hill Road between Kingswood Road and Valley Road;• Tootswood Road;• Scotts Avenue;• Scott's Lane;• Shortlands Road; and• South Hill Road. | |
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- 3.9. The proposed boundary and details of representations received were discussed with ward councillors. Ward councillors supported the designation of the Shortlands Village Conservation Area but there was general disagreement regarding the inclusion of the golf club, as they did not consider that it merited inclusion because it would create additional bureaucracy for the golf club; the site was already protected by the Metropolitan Open Land (MOL) designation; and the club house was of no particular merit. As noted in Table 1 above, officers consider that the golf club should be included. The Conservation Area designation should be justified based on whether an area meets the requirements of legislation, i.e. whether there is special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Therefore, the fact that the golf club already has significant protection through the MOL designation is not a relevant consideration when considering whether an area should be designated as a Conservation Area; if the area is considered to warrant designation, it should be designated.
- 3.10. In conclusion, the proposed boundary has been subject to extensive consultation and representations received have been fully considered. The consultation exercise showed significant support for the designation of the Shortlands Village Conservation Area. Where representations suggested changes to the proposed boundary (either additions or removals), responses to these have been set out in Table 1. One amendment to the boundary is proposed, to include the railway embankment on Ravensbourne Avenue, as shown at Appendix 3.

Options for designation

3.11. The BEAMS report sets out three options for designating the proposed area:

- Option A – add the area to the existing Bromley Town Centre Conservation Area, with the area being regarded as a separate character area within the wider Conservation Area.
- Option B – add the southern section around Queens Mead and across the pedestrian bridge to Valley Road to the existing Bromley Town Centre Conservation Area; and designate the rest of the assessment area as a new Shortlands Village Conservation Area.
- Option C - create a new Shortlands Village Conservation Area for the entire assessment area.

3.12. BEAMS noted that Option B was their preferred option, as this would have the advantage of being a more clearly defined artisan village with fewer exceptions. As noted above, HE also support Option B.

3.13. Option B was also the most popular option from the consultation responses. Of those representations which stated agreement or disagreement with each option, 95 strongly agreed or agreed with Option B and 29 strongly disagreed or disagreed. In comparison, 63 representations strongly agreed or agreed with Option C and 41 strongly disagreed or disagreed; and 32 representations strongly agreed or agreed with Option C and 45 strongly disagreed or disagreed.

3.14. Given the support in the BEAMS report and from the consultation responses, officers consider that Option B should be the chosen option for designating the proposed Conservation Area. As noted in the BEAMS report, the Southern section around Queens Mead and across the pedestrian bridge to Valley Road will form part of an extended Bromley Town Centre Conservation Area. Although part of this Southern section includes the Pumping Stations on Valley Road (over the railway from the existing Bromley Town Centre Conservation Area), this area aligns well with the existing Conservation Area, both geographically and in terms of character. The area to the west of the railway is detached from the other properties on the western side which are included in the Shortlands Village Conservation Area along Valley Road

around Shortlands Station. Including the Southern section in the Bromley Town Centre Conservation Area also means the Shortlands Village Conservation Area is a more clearly defined artisan village.

- 3.15. Option B will necessitate an extension to the Bromley Town Centre Conservation Area and the designation of a new Shortlands Village Conservation Area. Appendix 3 shows the new and extended boundaries.

Conservation Area appraisals

- 3.16. Conservation Area Appraisals provide a statement of character and appearance for a Conservation Area along with a management plan for its conservation. Officers will prepare a Conservation Area Appraisal for the Shortlands Village Conservation Area and an amended Appraisal for Bromley Town Conservation Area, based on the BEAMS report and informed by engagement with relevant stakeholders (as appropriate). These appraisals will be brought to a future meeting of the Development Control Committee for adoption.

4. POLICY IMPLICATIONS

- 4.1 Conservation Area designation will be relevant in the determination of planning applications in the newly designated area. Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals on listed buildings and conservation areas. In respect of conservation areas, it requires that 'special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'
- 4.2 There are a number of Development Plan policies set out in the Local Plan and London Plan which would apply to proposals within a Conservation Area. Section 16 of the NPPF sets out national policy on how the historic environment should be conserved and enhanced.

5. FINANCIAL IMPLICATIONS

- 5.1 The designation of the new and amended Conservation Areas can be undertaken using existing resources.

6. LEGAL IMPLICATIONS

- 6.1 The formal process for designation will be completed in line with statutory requirements, in conjunction with the Council's legal services department.
- 6.2 The representation from the Shortlands Golf Club mentions a potential legal challenge of any decision to designate a Conservation Area which includes the golf club within the boundary. Officers consider that the golf club should be included in the boundary, and that there is sufficient justification for its inclusion as set out in the report.

Non-Applicable Sections:	IMPACT ON VULNERABLE ADULTS AND CHILDREN PERSONNEL IMPLICATIONS PROCUREMENT IMPLICATIONS
Background Documents: (Access via Contact Officer)	Bromley Local Plan 2019 - https://www.bromley.gov.uk/download/downloads/id/4768/bromley_local_plan.pdf

	<p>London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>National Planning Policy Framework (February 2019), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf</p> <p>'SHORTLANDS VILLAGE CONSERVATION AREA', Development Control Committee 14 July 2020, available from: http://cdslbb/documents/s50082507/SHORTLANDS%20VILLAGE%20CONSERVATION%20AREAPART%201%20REPORT%20TEMPLATE.pdf</p>
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