
Decision Maker: DEVELOPMENT CONTROL COMMITTEE AND RENEWAL,
RECREATION AND HOUSING PDS COMMITTEE

Date: DCC: 10 January 2023
RRH PDS: 23 January 2023

Decision Type: Non-Urgent Non-Executive Non-Key

Title: LOCAL PLAN REVIEW: ISSUES AND OPTIONS
CONSULTATION

Contact Officer: Ben Johnson, Head of Planning Policy and Strategy
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Chief Officer: Tim Horsman, Assistant Director (Planning)

Ward: All Wards

1. Reason for report

1.1 This report provides details of the proposed 'Issues and Options' Local Plan consultation.

2. RECOMMENDATION(S)

2.1 That the Development Control Committee and Renewal, Recreation and Housing PDS Committee:

- 1) Note the details of the proposed Local Plan 'Issues and Options' consultation including the example section provided at Appendix 1; and,
- 2) Note that the final decision to approve the 'Issues and Options' draft for public consultation will be for the Director of Housing, Planning, Property and Regeneration, in discussion with the Portfolio Holder for Renewal, Recreation and Housing.

Impact on Vulnerable Adults and Children

1. Summary of Impact: No Impact
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Transformation Policy

1. Policy Status: New Policy – review of the Local Plan
 2. Making Bromley Even Better Priority:
 - (1) For children and young People to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
 - (4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
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Financial

1. Cost of proposal: costs associated with consultation will be met from the Planning Policy and Strategy budget and funds from the Council's Growth Fund earmarked reserve.
 2. Ongoing costs: future costs associated with the Local Plan review will be met from the Planning Policy and Strategy budget and funds from the Council's Growth Fund earmarked reserve.
 3. Budget head/performance centre: Planning Policy and Strategy; Council's Growth Fund earmarked reserve
 4. Total current budget for this head: £0.568m; £0.6m
 5. Source of funding: Existing Revenue Budget for 2022/23; Council's Growth Fund earmarked reserve
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Personnel

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: Planning and Compulsory Purchase Act 2004; Town and Country Planning (Local Planning) (England) Regulations 2012
 2. Call-in: Not Applicable
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Procurement

1. Summary of Procurement Implications: N/A
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Property

1. Summary of Property Implications: N/A
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Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: The Local Plan review will include policies concerning carbon reduction and sustainability. The Local Plan will be subject to a

sustainability appraisal which assesses the extent to which the policies within the document will help to achieve sustainable development.

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? N/A
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

Background

- 3.1 On 6 October 2022, Executive agreed to commence a review of the Bromley Local Plan¹ and agreed additional one-off funding of £600k for the Local Plan review process, to be met from the Council's Growth Fund earmarked reserve.
- 3.2 Ahead of commencing the review, a call for sites consultation exercise was undertaken between August and November 2021. As part of this exercise, landowners, developers and other interested parties were invited to put forward potential development sites for allocation, for development of housing, employment and retail uses or any other uses. These sites will help to give an understanding of what land is available to meet different development needs.
- 3.3 The next stage of the Local Plan review will be an 'Issues and Options' consultation, in line with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

'Issues and Options' consultation

- 3.4 The 'Issues and Options' consultation will include separate chapters covering topic areas to be included in the Local Plan, e.g. housing, economy, design. Each topic chapter will set out the current Local Plan position, highlight relevant changes since adoption (e.g. changes to national or London-wide planning policy); and then identify various potential options for the new Local Plan to address any relevant changes. The full 'Issues and Options' document is not yet prepared but an example draft section (covering Housing²) is provided at Appendix 1, to set out what the document will look like and the scope of the content. There are likely to be a number of issues which cut across different topic areas, for example, design could refer to general design principles, housing design, or sustainable design standards, meaning it could potentially be discussed in at least three sections. Where possible, the document will seek to avoid repetition and will discuss issues within a specific topic area, to help focus responses.
- 3.5 The Government announced forthcoming changes to the planning system in early December 2022, and indicated that a consultation on changes to the National Planning Policy Framework (NPPF) would be launched later in December 2022. Any proposed changes to the NPPF will be reflected in the 'Issues and options' draft document, where they would have an impact on the scope of the Local Plan review; at the time of writing, there is little specific detail on the extent of changes, hence any commentary at this stage would only be speculation.
- 3.6 The Director of Housing, Planning, Property and Regeneration will approve the final 'Issues and Options' document for consultation, in discussion with the Portfolio Holder for Renewal, Recreation and Housing.
- 3.7 The rationale of this consultation is to seek views from stakeholders on potential policy options at an early stage; these views would then help inform the drafting of the Local Plan, alongside requirements set out in national and London-wide planning policy, Council priorities and updated evidence base documents. The 'Issues and Options'

¹ Executive report 6 October 2022, 'LOCAL PLAN REVIEW – TIMESCALES AND BUDGET', available from: <https://cde.bromley.gov.uk/documents/s50100152/Exec%20210922%20Local%20Plan%20Review%20Report.pdf>

² There may be changes to the housing section prior to finalising the 'Issues and Options' consultation draft.

document will not set out any preferred policy positions at this stage.

- 3.8 There is no statutory minimum consultation period for a Regulation 18 consultation, but it is proposed to consult for a period of 8 weeks. Consultation would be undertaken in line with relevant regulations and the Council's Statement of Community Involvement (SCI). A specific communications plan will be prepared with support from the Council's communications team, to ensure that the reach of the consultation is extensive.

Integrated Impact Assessment

- 3.9 The Integrated Impact Assessment (IIA) is an important technical document which underpins the Local Plan process, and includes various statutory assessments/appraisals including a Sustainability Appraisal (SA) which is governed by specific legislation.
- 3.10 Stage A of the SA process (the scoping stage) needs to identify the scope and level of detail of the information to be included in the SA report. It should set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives. The scoping stage helps ensure the SA process is proportionate and relevant to the plan being assessed.
- 3.11 When deciding on the scope and level of detail of the information to be included in the report, the plan-maker must consult the statutory consultation bodies (Historic England, Natural England and the Environment Agency). Officers intend to undertake this scoping consultation alongside the 'Issues and Options' consultation.

4. POLICY IMPLICATIONS

- 4.1 The preparation of a Local Plan is informed by various statutory and policy requirements, including national policy and guidance set out in the NPPF and Planning Practice Guidance (PPG); and London-wide policy set out in the London Plan.
- 4.2 The Levelling Up and Regeneration Bill proposes some significant changes to the plan-making process, and will result in consequential amendments to the NPPF and PPG as a result. Such amendments could affect the Local Plan review process, for example, changes to process requirements or impacts on the scope or type of evidence needed. Officers will keep up-to-date with ongoing policy changes, in terms of the impacts on the plan-making process.

5. FINANCIAL IMPLICATIONS

- 5.1 Costs associated with the 'Issues and Options' consultation will be met from the Planning Policy and Strategy budget and funds from the Council's Growth Fund earmarked reserve.

6. LEGAL IMPLICATIONS

- 6.1 The Planning and Compulsory Purchase Act (2004) (as amended); and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the statutory requirements for preparation of a Local Plan. Additional legislation applies with regard to preparation of the different assessments that form part of the IIA. The Local Plan and supporting documents will be prepared in line with relevant legislation.

Non-Applicable Sections:	Impact on Vulnerable Adults and Children; Personnel/Procurement/Property Implications; Customer Impact
Background Documents: (Access via Contact Officer)	<p>Bromley Local Plan 2019, available from: https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan</p> <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 (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>National Planning Practice Guidance – https://www.gov.uk/guidance/plan-making</p> <p>Planning and Compulsory Purchase Act 2004 - https://www.legislation.gov.uk/ukpga/2004/5/contents</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - https://www.legislation.gov.uk/uksi/2012/767/contents</p> <p>Bromley Statement of Community Involvement (July 2016) - https://www.bromley.gov.uk/planning-policy/statement-community-involvement</p> <p>Executive report 6 October 2022, 'LOCAL PLAN REVIEW – TIMESCALES AND BUDGET', available from: https://cds.bromley.gov.uk/documents/s50100152/Exec%20210922%20Local%20Plan%20Review%20Report.pdf</p>