



## Appeal Decision

Inquiry Held on 7 and 8 February 2018 and 4 May 2018

Site visit made on 7 February 2018 and 4 May 2018

**by J Dowling BA(Hons) MPhil MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 24<sup>th</sup> July 2018**

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**Appeal Ref: APP/G5180/W/16/3165767**

**Potter's Yard, Turpington Lane/Bromley Common, Bromley BR2 8JN**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Langford Walker Ltd against the decision of the Council of the London Borough of Bromley.
  - The application Ref DC/16/03939/FULL1, dated 19 August 2016, was refused by notice dated 1 December 2016.
  - The development proposed is demolition of existing buildings and removal of existing yard area. Erection of six terraced houses with 12 car parking spaces. Retention of existing open areas, new landscaping and tree planting.
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### Decision

1. This appeal is dismissed.

### Procedural Matters

2. The Inquiry sat for three days. I undertook an unaccompanied site visit on the 7 February 2018 to enable me to familiarise myself with the site and its surroundings and to observe the traffic and pedestrian flows on the surrounding road network during the morning peak. In addition I undertook an accompanied site visit on the 4 May 2018 where in addition to visiting the appeal site at the request of the appellant I also visited the Jackson Nursery site and at the request of two interested parties I viewed the appeal site from their properties.
  3. A Statement of Common Ground (SoCG) was submitted at the start of the Inquiry which set out the policy context along with matters of agreement and those in dispute.
  4. Due to time constraints it was agreed that both parties could submit their closing statements in writing to an agreed timetable. The Council also agreed to publish the closing statements on their website so that they could be available for inspection by any of the interested parties.
  5. A completed Unilateral Undertaking (UU) was submitted by the appellant which would seek to use reasonable endeavours to enable at least 10% of the construction jobs to be secured by residents of the ward or companies based in the ward; for the first three months to reserve units for people living or working in the ward or who has formally lived in the ward or who have family members living in the ward; to carry out and complete the remediation works; to create and plant a communal orchard which would be made available to future residents in perpetuity; to provide up to 12 electric vehicle charging
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points and to create a management company for the future management of the proposed communal orchard.

### **Application for costs**

6. At the Inquiry an application for costs was made by Langford Walker Ltd against the Council of the London Borough of Bromley. This application is the subject of a separate Decision.

### **Main Issues**

7. Based on the original reasons for refusal and the evidence submitted and heard in relation to the appeal I consider that the main issues are:
  - whether the proposal is inappropriate development for the purposes of the National Planning Policy Framework (the Framework) and development plan policy;
  - the effect of the loss of the employment use of the land; and
  - if the proposal is inappropriate development whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the development.

### **Reasons**

*Whether the proposal is inappropriate development?*

8. Section 9 of the Framework sets out the Governments approach to development in the Green Belt. It is clear that the Green Belt is seen as very important and the protection of the essential characteristics of openness and permanence are a clear priority<sup>1</sup>. Furthermore, it advocates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances<sup>2</sup>. Paragraph 89 of the Framework states that Local Planning Authorities should regard the construction of new buildings as inappropriate in the Green Belt but then details six exceptions to this rule. The sixth exception allows:

*"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development."*

9. Policy G1 of the London Borough of Bromley Unitary Development Plan (2006) (the UDP) states that within the Green Belt permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm and as such I consider this part of the policy to be consistent with the Framework. However, the policy then goes on to list a number of exceptions for the construction of new dwellings. This list does not reflect the exceptions listed in the Framework and of particular relevance to this appeal would not allow the limited infilling or partial or complete redevelopment of previously developed sites. As a consequence I

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<sup>1</sup> Paragraph 79 of the National Planning Policy Framework

<sup>2</sup> Paragraph 87 of the National Planning Policy Framework

- consider that the exceptions listed in the Framework should be given greater weight than those listed in the policy as to whether the development may be considered inappropriate or otherwise.
10. The Framework<sup>3</sup> defines previously developed land as land which is or was occupied by a permanent structure, including the curtilage of developed land (although it should not be assumed that the whole curtilage should be developed) and any associated fixed surface infrastructure. As a consequence I consider that a large proportion of the site, including the area where the proposed houses and parking would be sited, is capable of being considered as previously developed land.
  11. However, the exception also requires that any development of previously developed land should not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.
  12. The proposal would result in the demolition of the existing buildings and their replacement with a terrace of six houses, creation of car parking area and landscaping.
  13. The appellant makes the point in terms of openness and volume that the site is occupied by a number of existing buildings. Furthermore, they advocate that they can convert the existing buildings to three houses<sup>4</sup> and under permitted development they could erect other ancillary buildings and areas of hardsurfacing which would, in their opinion, have a far greater impact on the openness of the Green Belt than the appeal proposal.
  14. However the wording of the Framework states that new development should not have a greater impact than **existing**<sup>5</sup> development. As neither the conversion of the building that was approved under prior approval nor the ancillary buildings or hardsurfaced areas potentially allowed under permitted development have been carried out they do not exist. Therefore for the purposes of considering whether a development would be inappropriate they cannot, in my opinion, at this stage form part of either the volume calculations or the assessment of openness.
  15. Openness in the context of the Green Belt essentially means freedom from development. In considering the effect on openness I have had regard to the numerous Court of Appeal Judgements that the appellant has made reference to. In particular the findings in the John Turner judgement<sup>6</sup> regarding openness having a visual dimension.
  16. Having visited the site I agree with both of the previous Inspectors<sup>7</sup> that although the surrounding area has been significantly developed, including on land currently designated as Green Belt the site along with the adjacent Sea Cadet site contributes to the openness of the Green Belt. Furthermore, I concur that it acts as an important transition between the adjoining residential development and the more open expanses of Bromley Common.

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<sup>3</sup> Annex 2 of the National Planning Policy Framework

<sup>4</sup> LPA ref: 16/05502

<sup>5</sup> My emphasis

<sup>6</sup> John Turner v Secretary of State for Communities and Local Government and East Dorset Council [2016] EWCA Civ 466

<sup>7</sup> PINS ref: APP/G5180/W/16/3144248 and APP/G5180/W/16/3145669

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17. I observed on site that there are currently two single storey buildings located towards the rear of the site adjacent to the boundary with the Sea Cadets site and the pedestrian footpath that links Turpington Lane and Magpie Hall Lane. I acknowledge that they have an effect on openness but consider that given their location, limited height, bulk and mass their effect is very limited. The proposal would result in the demolition of these buildings and the creation of a two storey terrace of six units, which would each have their own separate curtilages. A shared driveway would lead to an area of surface parking and a cycle storage area with the remainder of the site landscaped.
18. The proposal would result in setting the new units further off the boundary than the current buildings in order to be able to provide rear gardens for the new units. Furthermore, the proposed new terrace would have a greater footprint and be higher and bulkier than the buildings it would replace. Whilst I recognise that this proposal is smaller than that contained in the previous appeal<sup>8</sup> I consider that it would result in the introduction of a significant quantum of development into what is currently a relatively open area. Furthermore, in my opinion the appeal scheme would be more visually prominent than the existing buildings and would be read as part of the neighbouring residential development rather than being reflective of its location within the Green Belt.
19. At the Inquiry the appellant highlighted the fact that large parts of the site are hardsurfaced and have previously been used for the parking of HGV's and lorries. Whilst I accept that the Framework includes associated fixed infrastructure within its definition of previously developed land in my opinion as this area does not contain buildings or structures it retains a sense of openness and does not obstruct views into and through the site. I acknowledge that the parking of vehicles in this area would reduce this sense of openness and restrict views however I agree with the previous Inspector in that even when combined with the existing buildings their scale and permanence would be significantly less than what is proposed.
20. As a result I consider that the proposal would have a greater effect on the openness of the Green Belt and the purposes of including land within it than the existing use and buildings.
21. Paragraph 90 of the Framework provides a list of five other forms of development that are also considered not inappropriate. I have assessed the proposal against this list and consider that it would not fall within any of these categories.
22. I therefore conclude that the proposal would not fall within the exceptions of development in the Green Belt and would adversely affect its openness contrary to the Framework, policy G1 of the UDP and policy 7.16 of the London Plan (2016) which states that the strongest protection should be given to London's Green Belt and that inappropriate development should be refused, except in very special circumstances.
23. As inappropriate development is, by definition, harmful to the Green Belt in accordance with paragraph 88 of the Framework I must give this substantial weight.

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<sup>8</sup> PINS ref: APP/G5180/W/16/3145669

*Loss of the employment use*

24. Policy EMP5 of the UDP allows the redevelopment of business sites outside of the Designated Business Areas subject to a number of caveats. These include that the size, configuration, access arrangements or other characteristics make it unsuitable for a Class B1, B2 or B8 use and that marketing of the site confirms the unsuitability and financial non-viability of the site for those uses.
25. I note that the appellant considers that EMP5 is time expired given the date of the UDP and the fact that it predates the Framework. However, as this policy does not prevent the redevelopment of business sites it merely requires that their potential future use for business is tested I consider that it accords with the Framework<sup>9</sup> which seeks to avoid employment sites being protected in the long term where there is no reasonable prospect of a site being used for that purpose.
26. The appeal site is located outside of the Designated Business Area and as such complies with the first requirement of this policy. Furthermore, it was clear from the evidence given at the Inquiry and from what I observed on site that current access arrangements to the site for commercial vehicles are restricted. Consequently, depending on the size of the vehicle, this would potentially require vehicles to route through the residential road network in order to be able to turn into the site. As a result I consider that the current access arrangements make the site unsuitable for Class B1, B2 and B8 uses that would require deliveries and collections from larger vehicles.
27. I am satisfied that the site has been subject to appropriate marketing. Whilst there have been a number of inquiries in the main these appear to be for alternative uses that would require planning permission and which, due to the location of the site in the Green Belt, means that there is an degree of uncertainty as to whether this would be granted. Furthermore, I consider that due to the Rookery Estates restrictive covenant it was clear that even if planning permission for an alternative use such as that suggested by Mr Parmar was to be obtained it is highly unlikely that it would be allowed to be implemented.
28. Finally, having obtained prior approval for the conversion of the existing buildings to three houses it is clear that when considered against the costs involved in bringing the current buildings to a level where they could be let or sold that the residential value of the site is such that the continued commercial use of the site would be unviable. As a result whilst I agree that the proposal would result in the loss of an employment use I am satisfied that the proposal would comply with policy EMP5 and the Framework.

*If the proposal is inappropriate development whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify the development.*

29. In support of the proposal the appellant has cited a number of fallback positions that they consider would have a greater effect on the openness of the Green Belt than the appeal scheme. However, in order to establish the validity

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<sup>9</sup> Paragraph 22 of the National Planning Policy Framework

- of a fallback position it is necessary to first establish that there is a greater than theoretical possibility that the fallback position may take place.
30. The fallback positions advanced by the appellant include the resumption of the existing commercial use; conversion of the existing buildings to residential and the possibility of erecting further outbuildings and hardsurfacing in association with the existing commercial use of the site under Classes H and J of Schedule 2, part H of the Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO).
31. As was outlined at the Inquiry the site has not been used for commercial purposes for a significant amount of time. For the reasons outlined above I accept that the continued use of the site on a commercial basis is unviable. The results of the marketing exercise have demonstrated that it would be very difficult to find a tenant and it was clear from the evidence at the Inquiry that the current owner does not wish to restart their previous business. Finally, even if the site were to remain in employment use it is clear from the evidence given by the representative for Rookery Estates that they would invoke the restrictive covenant to prevent the site being used on a commercial basis. As a result whilst I accept that it would be theoretically possible that the use could recommence and additional outbuildings and hardstanding areas could be constructed on the basis of the evidence before me I consider that this is very unlikely. Furthermore, there is no evidence that even if the commercial use of the premises did recommence that any future occupier of the site would exercise their permitted development rights or if they did what form this development would take. As a result I do not consider that there is a greater than theoretical possibility that these scenarios would occur. As a consequence I consider that I can only give this fallback position very limited weight.
32. With regards to the implementation of the prior approval it is clear from the evidence that the residential scheme is viable. Furthermore, the planning history for the site indicates a strong desire by the current owners to develop it for residential purposes. Consequently, I consider that should this appeal be dismissed then it is very likely the appellant would undertake this work. As a result I deem that the fallback position advanced with regards to the conversion of the buildings is realistic. Having established that the fallback position is viable and capable of implementation it is then necessary for me to consider what weight should be attached to it.
33. Unlike the appeal scheme the proposal would convert the existing buildings to one, two bed and two, one bed units. As a result I consider that the levels of activity and domestic clutter associated with the prior approval would be far lower than that which would result from the appeal scheme which is for two, two bed units and four, three bed units. Furthermore, unlike the prior approval scheme, the appeal proposal would result in the reconfiguration of the site with a more urban layout as each of the units would have individual curtilages and the remainder of the site would be formally laid out to parking areas and landscaping. Consequently, I consider that the appeal scheme would have a greater effect on the openness of the Green Belt than that which would result from the prior approval. Therefore whilst significant weight can be afforded to the fact that residential development can be carried out at the site I do not consider that it overcomes the harm to openness that I have identified would result from the appeal scheme.

34. Finally the appellant advocates that, subject to undertaking the works in the correct order, they could erect further outbuildings, extend the hardsurfacing and convert the existing buildings to housing. All of which in their opinion would have a greater impact on the openness of the Green Belt than the appeal scheme. Whilst I accept that this might theoretically be possible on the basis of the evidence before me I consider that this would be very unlikely as it would result in additional build costs and adversely affect the setting and outlook for the buildings to be converted which would, in my opinion, affect the viability of the residential scheme. As a consequence I give this fallback position very limited weight.
35. In coming to these conclusions I have taken into account the various legal judgements on fallback referred to by the appellant.
36. The appellant disputes as to whether the Council can demonstrate that they have five years worth of housing land supply. As a result they advocate that the 'tilted balance' comes into effect with regard to the presumption in favour of sustainable development. However, the second part of bullet point four of paragraph 17 of the Framework states that this presumption in favour of sustainable development should not be applied where specific policies in the Framework indicate that development should be restricted. These restrictions<sup>10</sup> include land designated as Green Belt. As a result whilst I accept that the proposal is capable of being delivered quickly, would boost the supply of housing and would make the efficient use of land in accordance with the Framework, the benefit would be very modest and is in any event significantly outweighed by the harm to the openness of the Green Belt that I have identified above.
37. I agree with the appellant that whilst individual benefits may attract limited weight, when taken together these benefits can attract significant weight. The appellant considers that the scheme would deliver a number of clear benefits including provision of six affordable 'starter' homes; loss of a bad neighbour development; improvements to highway safety through the cessation of the current use; delivery of a well designed scheme that would integrate into its surroundings and would result in landscape improvements that would benefit not only the site but the visual amenity of the wider area; redevelopment of the site would help with the renewal objectives for the area – in particular the creation of a gateway to Bromley; delivery of homes and jobs for local people in one of the more deprived wards; the proposed communal orchard would act as a continuation of the linear park on the adjoining site and provide a recreational benefit to future residents; drainage at the site would be improved including a reduction in surface water run-off ; the proposal would result in the efficient use of previously developed land; a reduction in the quantum of hardsurfacing at the site and the Council would benefit from Community Infrastructure Levy (CIL) payments.
38. Dealing with each of these in turn. Under the terms of the Unilateral Undertaking (UU) no discount is proposed to be applied to the new units nor are they to be formally given to a Registered Social Landlord. As a result the affordability referred to by the appellant appears to be based solely on the size of the proposed units. As the majority of the units proposed are three bed, I consider this to be family accommodation rather than starter homes. As a

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<sup>10</sup> Footnote 9 of Paragraph 14 of the National Planning Policy Framework

- consequence I do not consider that affordable starter homes is a benefit that the scheme would deliver.
39. I note the comments regarding the effect of the previous use on the living conditions of the residents of adjoining properties and the issues with highway safety. Furthermore, the appellant has made reference to a number of appeal decisions in the Green Belt where the loss of an unneighbourly use was a material consideration. However, for the reasons outlined above I consider that, given the appellant has prior approval to convert the existing buildings to residential and that Rookery Estates have made it clear that they would prevent the commercial use of the site I consider that it is unlikely that a commercial use would recommence at the site and as a consequence I give the benefit delivered by the cessation of the previous use very limited weight.
  40. I accept that the proposal has through the proposed architectural detailing, layout and palette of materials been designed to reflect and respect the character and appearance of the wider area. I also accept that as a consequence of the proposal the site would be tidied up and landscaped. However, for the reasons I have already outlined I consider that the proposal would adversely affect the openness of the Green Belt which I consider outweighs any benefit that would be delivered from these elements of the appeal scheme.
  41. All parties accepted that the due to its overgrown nature and the fact that it has been allowed to fall into disrepair that the site detracts from the character and appearance of the area. Consequently I accept that it does not accord with the Council's long term aspirations to create a gateway to the area. However, whilst the appeal scheme would result in the landscaping and tidying up of the site I consider that to a lesser degree the same effects would be delivered through the prior approval and as a result I give this benefit very limited weight.
  42. Under the UU the appellant would seek to use reasonable endeavours to enable at least 10% of the construction jobs to be secured by residents of the ward or companies based in the ward. Whilst this is a benefit that would be delivered by the scheme I consider given that the scheme is for six units the number of construction jobs created would be relatively small and therefore I can only give this benefit limited weight.
  43. The adjoining linear park, unlike the proposed communal orchard, is publicly accessible. As a consequence whilst I accept that the communal orchard could be perceived visually as continuation of the linear park it would only be for use by future residents of the scheme and is in any case required as mitigation. As a result I consider that this can only be given limited weight.
  44. I accept that the proposal would improve the drainage at the site, reduce the quantum of hardstanding and result in the more efficient use of previously developed land in accordance with the guidance contained within the Framework. However, I consider that the harm that would arise to the openness of the Green Belt as a result of the proposal outweigh these benefits.
  45. CIL payments are required to mitigate the effect of the proposal on infrastructure provision in the district and are therefore not a benefit of the scheme as a result I can give this benefit no weight



46. Whilst I note the support that the scheme has locally I do not consider that this outweighs the harm that I have identified above.
47. The appellant highlighted that the proposal would accord with a number of policies within the development plan including T18, EMP6 and H1. Furthermore, for the reasons outlined above I consider that the proposal would accord with EMP5. I acknowledge that planning policy and primary legislation both identify the importance of the development plan in making decisions whilst requiring that other material considerations be taken into account. It is well established that compliance with the development plan is not compliance with each and every policy and the decision maker is required to reach a conclusion with regard to the plan when read as a whole. On this basis I conclude that whilst the proposal may accord with other policies within the plan for the reasons outlined it would not comply with the most relevant policies namely G1 of the UDP and 7.6 of the London Plan and therefore I consider that it does not accord with the plan when read as a whole.
48. I accept that the appeal proposal would result in less vehicular activity than the car wash that was proposed on the Sea Cadets site<sup>11</sup>. However, this scheme was dismissed at appeal and does not lead me to a different conclusion in this case.
49. At the request of the appellant I visited the Jackson Road site and whilst there are some similarities between the two schemes I consider that they are materially different not least because of the large number of glasshouses located on the Jackson Road site; the proximity of a number of listed buildings and the site layout and topography. As a result the Jackson Road decision does not lead me to a different conclusion in this appeal.
50. I accept, given its previous use that the site may be contaminated and that the proposal would secure its remediation. However, whilst this is a benefit of the scheme I do not consider it sufficient to address my concerns regarding the effect on openness.
51. Opposite the site is the Bromley Common Conservation Area. From what I observed on site I agree with the Council and the appellant that the proposal would not adversely affect the setting of the Conservation Area.
52. As a result I do not find the other considerations in this case clearly outweigh the harm I have identified to openness. Looking at the case as whole, I consider that the very special circumstances required to justify the development do not exist. Consequently the proposal would be contrary to policy G1 of the UDP and 7.6 of the London Plan.

#### *Unilateral Undertaking*

53. A completed Unilateral Undertaking (UU) was submitted by the appellant which would seek to use reasonable endeavours to enable at least 10% of the construction jobs to be secured by residents of the ward or companies based in the ward; for the first three months to reserve units for people living or working in the ward or who has formally lived in the ward or who have family members living in the ward; to carry out and complete the remediation works; to create and plant a communal orchard which would be made available to future residents in perpetuity; to provide up to 12 electric vehicle charging

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<sup>11</sup> PINS ref: APP/G5180/W/17/3173651

points and to create a management company for the future management of the communal orchard.

54. The Framework<sup>12</sup> states that planning obligations should only be sought where they meet a number of tests namely that they are necessary to make the development acceptable in planning terms; directly related to the development and fairly and reasonably related in scale and kind. In my opinion the remediation works and provision of vehicle charging points meet these tests.
55. Whilst I agree that landscaping around the site would be necessary to mitigate the effect of the scheme this could also be delivered through the use of a condition. Furthermore, in my opinion the landscaping does not need to take the form of a communal orchard for which there is no policy justification. However, as no landscaping condition has been suggested I am satisfied that the communal orchard and its management meets the Framework test in that it would provide the necessary landscape mitigation for the site.
56. With regards to the proposals to secure employment opportunities locally and give first choice to purchase the new units to local residents or people who have a local connection are commendable, in my opinion they are not necessary to make the development acceptable in planning terms and therefore I consider that they fail to meet the Framework tests.

**Conclusion**

57. I therefore conclude that the proposal would be inappropriate development in the Green Belt as defined by the Framework. The proposal would erode the openness of the Green Belt. As outlined above I give only limited weight to each material consideration cited to support the proposal and conclude that taken together they do not outweigh the harm that the scheme would cause. Consequently, I conclude that the very special circumstances necessary to justify inappropriate development in the Green Belt do not exist. For the reasons given above and having regard to all other matters raised I conclude that the scheme is not sustainable development for which the Framework indicates that there should be a presumption in favour and therefore the appeal should be dismissed.

*Jo Dowling*

INSPECTOR

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<sup>12</sup> Paragraph 204

**APPERANCES**

**FOR THE APPELLANT**

Mr Christopher Rees

**He called**

Mr Ian Dix	Vectos
Mr John Escott	Chartered Town Planner, Robinson Escott Planning LLP
Mr Thomas Hegan BSc (Hons) MRCIS	Partner, Turner Morumm LLP
Mr Robert McQillian	Independent planning consultant
Mr Adrian Tutchings FRICS	Senior Partner, Linays Commercial Limited

**FOR THE LOCAL PLANNING AUTHORITY**

Mr Ian Rees-Phillips, of Counsel

**He called**

Mr David Board BA (Hons) PG Dip MRTPI	Principal planner, London Borough of Bromley
Ms Claire Glavin	Planner, London Borough of Bromley

**INTERESTED PARTIES**

Mr Terry Bagnall	Local resident
Mr Simon Clayton	Local resident
Mr James Hasell	Local resident
Ms Janet Lahouag	Local resident
Mr Traiq Lahouag	Local resident
Mr Garry Parmar	Local resident
Mr Lee Reeves-Perrin	Solicitor for Mrs Potter, current owner of the site
Mr Anthony Sheanon	Local resident
Mr Steve Spear	Representative on behalf of former local resident
Mr Barry Wolfenden	Representative for Rookery Estates

**Documents received and accepted into the Inquiry prior to opening**

<b>Document 1</b>	Rebuttal Proof of Evidence for Claire Galvin submitted by email 29/01/18
<b>Document 2</b>	Costs application by appellant
<b>Document 3</b>	Extract from SPON's costs and email from Cushman Wakefield dated 18 May 2017 submitted by email 1/02/18
<b>Document 4</b>	Replacement appendices 11 and 12 for Mr Escott's Proof of Evidence submitted by email 1/02/18
<b>Document 4</b>	Signed general Statement of Common Ground dated 2/02/18
<b>Document 5</b>	Signed Housing Statement of Common Ground dated 5/02/18
<b>Document 6</b>	Extract from the Bromley Maps and Conservation area description and accompanying email 5/02/18

**Documents submitted during the course of the Inquiry**

<b>Document 7</b>	Copy of appeal decision for the Sea Cadets Hall (TS Narvik), Magpie Hall Lane, Bromley BR2 8JE (PINS ref: APP/G5180/W/17/3173651)
<b>Document 8</b>	Copy of appeal decision for Sunridge Park Mansions, Willoughby Lane, Bromley BR1 3FZ (PINS refs: APP/G5180/W/16/315788; APP/G5180/Y/16/3157889; APP/G5180/W/17/3171036; APP/G5180/Y/17/3171038)
<b>Document 9</b>	Extract from SPON'S Architects and Builders Price Book 2017
<b>Document 10</b>	Extract from Council's Environmental Health incident log for the site
<b>Document 11</b>	Opening statement on behalf of the appellant
<b>Document 12</b>	Statement from Mr Terence Bagnall
<b>Document 13</b>	Statement from Mr Simon Clayton
<b>Document 14</b>	Statement from Mr James Hasell
<b>Document 15</b>	Statement of Pamela Anne Potter
<b>Document 16</b>	Copies of the vehicle licences for the appeal site
<b>Document 17</b>	Appendix CG-14 to Claire Glavin's Proof of Evidence
<b>Document 18</b>	Copy of extract of the summary of responses (June 2017) for the Bromley Proposed Submission Draft Local Plan Consultation 2016 with regard to renewal area
<b>Document 19</b>	Extract from the Bromley Biodiversity Plan
<b>Document</b>	Closing statement for the Council
<b>Document</b>	Closing statement for the appellant