

# London Borough of Bromley Local Plan Examination – Matters Statement

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**Our ref** 14473/05/SB/RM  
**Date** November 2017  
**From** Lichfields on behalf of Dylon 2 Limited and Relta Limited (Objections 134 & 135)

**Issue** **3 - Is the Spatial Strategy for Bromley sound having regard to: the needs and demands of the Borough; the relationship with national policy and Government objectives; the provisions of the London Plan; and, the evidence base and preparatory processes? Has the Plan been positively prepared?**

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**1.0 Q.9. Will the strategy satisfactorily deliver the new development and infrastructure needed over the plan period?**

1.1 No.

1.2 Housing need in Bromley is identified in the tested London SHMA (2013) to total 1,315 dpa. This Local Plan is only planning for the delivery of 641 dpa, so housing need over this plan period will go substantially unmet. As set out in response to Q.16, the Council has not complied with the requirements under Policy 3.3 of the adopted London Plan to produce a Local Plan which achieves and exceeds the London Plan minimum benchmark (Draft Policy 1) or secondly, closes the gap with housing need. This is despite the fact that the recently published new London SHLAA identifies a capacity based estimate for Bromley of 1,424 dpa, a significant uplift on 641 dpa being planned for in this plan. As such, not only is this Local Plan failing to meet need, it is not even trying to do any more than the bare minimum required of it in terms of housing delivery. As such the plan has not been positively prepared with a strategy that seeks to meet objectively assessed needs (OAN) (NPPF paragraph 182).

**2.0 Q.12. The preparatory work for the Plan has not included a comprehensive review of Green Belt to accommodate development but only changes, where necessary, to meet certain development needs. Justify this approach and its implications for the spatial strategy?**

2.1 As detailed in our response to Q.42 and Q.44, the ‘2014 Review’ (SD26) does not set out any clear and transparent criteria for review and consequentially is wholly inadequate. It fails to meet the requirement for ‘positive planning’.

2.2 It provides only limited commentary and a schedule of changes that were originally reported to the Council’s Development Control Committee in June 2012 (SD58).

2.3 In order to be sound, a full and comprehensive review of Green Belt (and MOL and UOS) boundaries is required to enable the Council to “*meet objectively assessed development and infrastructure requirements*”, as required by the NPPF (para.182). The GB review undertaken is not “*adequate, up-to-date and relevant evidence*” (NPPF para. 158).

- 2.4 In light of our evidence (appended to our Hearing Statements) in response to Issues 5 and 10, we conclude that the BLP fails to address the balance between the significant need for residential development and the extent of current (restrictive) designations of GB and MOL, does not accord with the requirements of the NPPF and is not sound.

**3.0 Q.13. Give further details on the relationship between the implementation of policies in the Local Plan and Bromley Town Centre Areas Action Plan. Should any changes to the Area Action Plan which would result from the adoption of this Plan be explicitly stated on a schedule as an Appendix?**

3.1 Yes.

3.2 The Town Centre Area Action Plan and emerging Local Plan have significant inconsistencies. Parts of the Town Centre Area Action that would be superseded should be explicitly stated in a BLP Appendix, for clarity, or the Area Action Plan withdrawn all together.

Total Word Count – 401