London Borough of Bromley
Submission Local Plan 2017

CONSULTATION STATEMENT
(Regulation 22 (c))
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1 **Introduction**

1.1 This statement sets out the breadth of consultation undertaken in the plan making process, how those representations have been responded to and how they influenced the development of the Submission Draft Local Plan. The Council’s published documents are available on the Council’s website, in particular formal Committee papers are found at [Council and democracy - London Borough of Bromley](#).

1.2 It is produced in line with Regulation 22 c) of The Town and Country Planning (Local Planning) (England) Regulations 2012, setting out which bodies and persons the local planning authority invited to make representations under regulation 18, how they were invited to make representations, summarises the main issues raised by the representations made pursuant to regulation 18 and setting out how these representations have been taken into account. It also sets out that representations were made pursuant to Regulation 20, the number of representations made and provides a summary of the main issues raised in these representations.

**Background**

1.3 The Bromley Unitary Development Plan was adopted in 2006. It was supplemented by the Bromley Town Centre Area Action Plan (BTCAAP) 2010. These documents were prepared under legislation and regulations now superseded, latterly the Planning and Compulsory Purchase Act 2004, and in accordance with The Town & Country Planning (Local Development) (England) Regulations 2004 as Amended by the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.4 In 2008 ‘Planning Policy Statement 12 was published “Creating strong safe and prosperous communities through Local Spatial Planning”. In response the Council initiated work on its’ ‘Local Development Framework’ (LDF) as the spatial expression of the Council’s Sustainable Community Strategy.

1.5 Bromley’s early key stakeholder engagement included a Community Strategy workshop (June 2008) and officers/local partnerships workshop, (September 2008), which examined evidence and identified a range of planning issues and opportunities. A subsequent series of ward member workshops (2009/10) sought to explore the spatial implications of matters raised and recognise locally distinctive issues.

1.6 Development Control Committee (21st April 2009) recommended the convening of a member advisory panel to engage with officers and other parties and advise the Committee and the Council’s Executive with regard to the development of the LDF (and latterly, The Local Plan). The “Local Development Framework Advisory Panel” (LDFAP) met regularly throughout the process to consider in draft, evidence, representations and proposed consultation material prior to presentation for consideration at Development...
Control Committee and decision making at Executive. Details of Council decision making are set out in Appendix 1.

1.7 The public consultation process, which commenced in 2011 with the publication of the ‘Core Strategy Issues Document’, which introduced a web based approach hosted by an external Local Plan consultation platform. As this statement will demonstrate the online facility has been complemented by a wide range of approaches to ensure effective consultation and throughout the process, in line with the 2006 adopted Statement of Community Involvement (SCI) and the updated approved SCI (2016)

**Statement of Community Involvement**

1.8 The Statement of Community Involvement (SCI) was first adopted in 2006. It outlines the Council’s standards for community participation in the planning process and identifies the ways the Council proposes to achieve these standards.

1.9 In 2016 a consultation was held on revisions to the Statement of Community Involvement to ensure it reflected changes to the planning system and technological advances that enable a change in emphasis to new consultation techniques.

2 **Consultation**

**Stages**

2.1 Local Plan development, which commenced with pre-consultation workshops and was the subject of 5 main stages of consultation.

2.2 Stage 1: 2011 Core Strategy Issues Document
This stage initiated the development of Local Development Framework ‘Core Strategy’ in line with the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (2008)


Stage 2: 2013 Options and Preferred Strategy (OPS)
2016 Local Green Space Consultation (LGS)
Stage 5: 2016 Proposed Submission Draft Local Plan (PSDLP)
Methods of Engagement

2.4 The primary consultation process was established in the Stage 1 consultation (2011 Core Strategy Issues Document). The consultation encouraged responses on-line via a dedicated portal accessed via the Council’s website page Developing Bromley's Local Plan, and promoted on the front page of the Bromley website and via other methods outlined in para 2.5. The online facility enables borough wide access, assists in the analysis of the responses and minimises cost, although representations made in any written format were accepted.

2.5 To ensure the 2011 Core Strategy Issues Document (CSID) consultation reached as widely as possible the process included the following promotional activities to raise public awareness.

- Publicity through press releases, articles and adverts in the Bromley Times, News Shopper, Bromley Borough News, and Biggin Hill News and included newspaper ‘wrap arounds’.

- Promotional material including A4 posters and A5 flyers and hard copies of the CSID were made available across the Borough, in Council offices and reception points and at all council libraries and Community House (Community Links Bromley). Leaflets were also distributed via Cotmandene and Mottingham Outreach Centres and other community venues e.g. Bromley Adult Education College, Mytime leisure centres and police stations. Town Centre Managers also distributed leaflets and Bus Shelter advertising was displayed in Bromley Town Centre.

- At the start of the plan making process, letters/emails were initially sent to over 1000 residents, agents and others registered on the planning department’s consultation database. This included self-registrations though the portal which was encouraged in all publicity material.

- Presentations were made at the annual Residents Seminars and discussions at meetings of the Bromley Residents Federation, with Disability Voice, Bromley Youth Council and the Gypsy and Travellers Project.

- Promotion through regular partnership group meetings, including, as appropriate,
  - the Local Strategic Partnership, (subsequently the Borough Officers Group) with representatives of the Borough’s main strategic partners, namely, the Primary Care Trust - PCT (now Clinical Commissioning Group - CCG) and strategic NHS body, Public Health, Police Service, Bromley Federation of Housing Associations and Community Links, London Fire Brigade, Department of Work & Pensions, Community Links Bromley, London South East Colleges.
  - the Economic Partnership (quarterly, including the Chamber of Commerce, Community Links Bromley, Bromley Education Business
Partnership, London South East Colleges, Federation of Small Businesses and other business stakeholders) N.B. the membership of the partnerships consulted has changed over time to include new organisations including Your Bromley BID, Orpington 1st BID;

- Property Agents Forum (commercial property agents, typically 2-3 times a year);

- Articles and links to the document included in Bromley’s business e-bulletin sent to over 3,500 businesses in July and September 2011;

- Articles and links to the document in Bromley Community Links e-bulletin;

- Involvement in the production of the Public Health “Joint Strategic Needs Assessments” and engagement with Fire and Ambulance Services;

- Information sent to partner organisations and interest groups for circulation, including through health organisations / facilities, housing providers and faith organisations and mobility forums;

- advertised through the staff intranet (many staff are also resident in the Borough);

- and direct telephone access to the Local Plan team, advertised through all consultations listed above.

2.6 Later stages of the regulation 18 consultations repeated these approaches and also included publicity through ‘Update’, an online newsletter to local residents (Spring 2013, Spring 2014, Summer 2015). Additionally opportunities were taken to maximise engagement with a range of community and interest groups appropriate to the various stages of consultation e.g.

- ongoing engagement with the ‘Healthy Weight Forum’;

- the presentation to the Mottingham Big Local (19th March 2013) and a Bromley Town Centre Black and Minority Ethnic group on the 2013 Options and Preferred Strategy consultation;

- meeting with the Cray Valley Community Forum (27th March 2014) following the 2014 Draft Policies and Designations Document consultation;

- presentation to the Bromley Residents Federation (17th September 2015) and Bromley Youth Council (15th October 2015) regarding the Draft Allocations and Further Policies and Designations consultation;

- Presentation to the Allotment Holders Panel (24th February 2016) and onsite meetings during the Local Green Space consultation and during the preparation of the Proposed Submission Draft Local Plan;

- Meetings with the Bromley Biodiversity Partnership Group during 2016 (11th January and 14th March) specifically relating to the Local Green Space consultation.

- Consultations with the Traveller community have been significant and ongoing (set out in detail in Appendix 2);
Additionally, the database of contacts expanded throughout the Local Plan development from 1,000 to over 2,300.

**Duty to Cooperate**

2.7 The Localism Act 2011 introduced a legal duty to cooperate on the Council. The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. The bodies prescribed are:

- Environment Agency
- Natural England
- Mayor of London (as represented by the Greater London Authority),
- Civil Aviation Authority
- Homes and Communities Agency
- Bromley Clinical Commissioning Group (clinical commissioning group established under section 14D of the National Health Service Act 2006)
- National Health Service Commissioning Board
- Office of Rail Regulation
- Transport for London
- Highways Agency,
- Marine Management Organisation.

The Council’s Duty to Co-operate Statement 2017 sets out how it has met this duty.

**Developing Bromley’s Local Plan**

3 Pre Consultation analysis and workshops 2008 - 2010

3.1 The Council has been keen to develop policy on the basis of an effective appreciation of the spatial variations across the Borough. Recognising that electoral ward boundaries do not necessarily reflect these spatial variations, the process of Core Strategy development sought initially to understand local places and issues. The task was frontloaded with a series of workshops.

3.2 In Sept 2008 a Key Stakeholders initial workshop was held to discuss key strategic themes alongside data and the plans and strategies of partners and key stakeholders, as well as broader data (e.g. ONS etc.). The workshop included representatives from Community Links Bromley, London Fire Brigade, Metropolitan Police, Disability Voice Bromley, Age Concern, Bromley Primary Care Trust, the business community, Bromleigh Housing Association, Children and Family Forum, Bromley Mytime, English Heritage, Environment Agency, Bromley Friends of the Earth, Ethnic Communities Programme, Churches Together in Bromley and Transport for London

3.3 A series of member workshops were held in 2009 / 2010 to enable all ward members to contribute their knowledge of their communities in order to define some of the key characteristics that help to identify distinct areas and
communities within the Borough and to assist in the development of policies tailored to the particular needs of those areas.

- 8th December 2009 - North East Wards
- 27th January 2010 - North West Wards
- 17th February 2010 - Southern Wards

The workshops informed the development of the spatial approach to the plan and the identification of distinct “Places” within the Borough and highlighted issues subsequently consulted on in the “Core Strategy Issues Document” (2011).

3.4 As indicated in Appendix 1, the evidence was considered and draft issues identified with the support of the Local Development Framework Advisory Panel (LDFAP). The panel assisted with the development of a draft structure and approach for a Core Strategy Issues consultation. This approach, incorporating 21 pen portraits of areas of the Borough (‘Places’) was presented to, and considered by, Development Control Committee (8th March 2011). The Development Control Committee agreed the structure and approach to preparing the local development framework in line with the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (2008). The draft Core Strategy Issues Document was further refined with LDFAP engagement prior to presentation, and consideration, at Development Control Committee (19th April 2011).

4 Core Strategy Issues Document (2011)
(Local Development Framework Regulation 18)

4.1 The Stage 1 consultation on the “Local Development Framework Core Strategy Issues Document” set out a draft Vision for the Borough and objectives. It included information and a range of questions around strategic themes along with area profiles of the 21 ‘Places’ derived through the earlier member workshops. With recommendation from Development Control Committee, the document was approved by the Council’s Executive (25th May 2011) for consultation over the Summer / Autumn between July and the beginning of October 2011.

Consultation

4.2 This consultation was not a statutory consultation but formed part of the ‘front loading’ engagement process required by Government regulations and policy at that time. The aim being to increase participation and reduce the level of objections and resources required at later stages of the plan making process. The consultation activities, outlined in para 2.5 above, were employed and to launch the public engagement and raise the awareness of the development of the Local Plan a consultation ‘market stall’ set up in Bromley High Street on two busy market days in August and September 2011.
The consultation, ran for some 12 weeks over the Summer / Autumn of 2011 from 8\textsuperscript{th} July and was further extended by a few days following requests from several local residents finally closing 3\textsuperscript{rd} October 2011.

Representations made to the ‘Core Strategy Issues Document’ Consultation

Over 100 individuals and organisations responded to the consultation document making over 625 comments in total. The use of the on-line system to respond was relatively low. The spread / distribution of responses received to each of the 3 main sections as follows :-

- Vision and objectives - 46 comments
- Strategic / Spatial Themes- 358 comments
- Place Pen Portraits- 221 comments

The full representations were made available to all Members and presented to the Local Development Framework Advisory Panel for early consideration. Detailed summaries for all representations were publically reported to Development Control Committee 17th November 2011 for consideration. The representations on the Vision and Objectives and Strategic / Spatial Themes are set out in Appendix 1c and are further summarised below.

**Vision - Main representations included**

- The Vision statement should show more clearly how it is hoped Bromley will develop and relate closely to the Council’s Community Strategy, particularly regarding the quality of the environment and new housing.
- The objectives should be SMART (Specific, Measurable, Achievable, Realistic and Timed), reflecting areas of priority, including a realistic timeframe in relation to resources available. It was felt that some objectives were contradictory.
- The Vision referencing conservation areas etc reflects the current situation rather than a future vision addressing changes eg in population
- The loose boundary pen portraits were supported and it is suggested that the vision should be expanded to set out how the area and the places within it should develop.
- It was noted that there are major disparities between the income and health factors across the Borough and that these disparities should be reflected in the vision.
- Attention was drawn to London Plan references to borough responsibilities, in respect of social infrastructure

**Open and Natural Space Objectives - Main representations included:**

- broadly supported by Natural England and the Environment Agency with suggested amendments and additions
- Suggested additional Objective facilitating changes to the Green Belt boundary for land not serving the 5 purposes of Green Belt
- development, which preserves the openness and appearance of the Green Belt should therefore be allowed to provide for the growing

**Health and Wellbeing Objectives - Main representations included:**
The Healthy Urban Development Unit suggests that the objective concerned with tackling deprivation should reference “health inequalities”.

Natural England suggest explicit reference to the role of green infrastructure and the natural environment in respect of health, recreation and climate change with policies to ensure green infrastructure is designed to deliver these multiple functions.

The Environment Agency support the objectives and suggest an additional objective encouraging healthier local environments.

A suggested objective regarding planning for the ageing population, in particular a pro-active stance towards specialist housing.

**Housing Objectives - Main representations included:**

- Support for the increased supply of new homes.
- Existing policies would not deliver the necessary quantum of growth and would not be sound.
- Concern regarding the quality of existing flats particularly poorly maintained conversions which adversely affect character.
- Concern regarding the demolition of older properties for flats and ‘executive homes’, with little regard for infrastructure - local schools, surgeries.
- Suggested that the objective be titled “Homes” rather than “Housing”.
- The objective should provide an appropriate supply of housing suitable to a range of differing incomes.
- Bromley should sign up to the London Accessible Housing Register (LAHR).
- Potential to use the pen portraits to highlight where future development is likely.
- The Environment Agency support the objectives and suggests revisions related to the reduction of the environmental impact of new and existing developments notably in respect of contaminated land, flood risk and measures to mitigate and adapt to climate change.

**Community Facilities Objectives - Main representations included:**

- Support for new accessibly located community facilities and for the retention of existing / resistance of net loss (Metropolitan Police Authority / Service, Bromley College of Further and Higher Education and others).
- Change may be required to modernise the provision of services (South London Healthcare NHS Trust).
- Need to highlight “places of worship”.

**Business and Employment Objectives - Main representations included:**

- Support for the encouragement of business and employment through investment and development in the local economy.
- Support, with particular reference to land adjacent to Crayfields Business Park, for the objective to ensure that there is an adequate supply of commercial land.
- Business areas should be encouraged to adapt to the changing needs of modern industry and commerce.
- Representation on behalf of Scotia Gas Networks suggesting that sites be reviewed with only the best employment land retained and protected.
- Amendments to objectives suggested to that effect.
- The most efficient and effective use should be made of land, prioritising...
• previously developed land, noting employment from a range of uses including retail.
• Enhancement of Bromley’s position as a Metropolitan Town welcomed including the encouragement of a prosperous evening economy (Capital Shopping Centres)
• Support from The Environment Agency with suggested revisions relating to business, use of resources and environmental impacts.
• Sustainable design and construction can add value to the local economy.

**Town Centres Objectives - Main representations included:**
• Bromley Town Centre objective supported with suggested reference to the council working pro-actively with landowners to enable delivery.
• Retail offer should be diverse and including a mix of independents and chains
• suggest commitment to build and retain markets
• Need to look closer at areas for regeneration, where vacancy is an issue e.g.
• Concerns about anti-social behaviour deterring visitors.
• Proposal for banks in prime town centre locations including within Bromley Town Centre (would require BTCAAP changes).

**Environmental Issues Objectives - Main representations included:**
• Suggests reference to Green Infrastructure within the objectives
• The Environment Agency support the objectives and suggest combining elements with Objective section1 (Open and Natural Space) and revisions / additions notably relating to the water efficiency and flood risk of new developments, managing land sustainably; protecting soils, water, air quality and biodiversity and contributing positively to reducing and adapting to climate change.
• Surrey County Council welcome the objective to increase self-sufficiency in dealing with waste - municipal, commercial / industrial,
• construction/demolition

**Design and the Public Realm Objectives - Main representations included:**
• Support for the objectives to improve the provision of open space in new development, ensuring accessible and safe streets.
• Support from Natural England with encouragement for the council to include the provision of “soft” landscaping.
• Support from The Environment Agency with suggested additions, notably in relation to the improvement of rivers and their corridors, flood risk, sustainable design and construction and the highest design standards to deliver distinctive and valued additions to areas, retention of existing buildings for their historic associations and the energy already expended in their construction and referencing the Water Framework Directive

**Built Heritage Objectives - Main representations included:**
• Need to promote Bromley’s heritage, refer to heritage assets on the at risk register, and address historic character and the wider historic environment through appropriate new development

**Transport Objectives - Main representations included:**
• Safe accessible uncluttered streets objective is welcomed.
• Sustainable transport should be encouraged, through redevelopment opportunities which enhance public transport facilities, improve access and facilitate linked trips through to mixed-use developments.

• Encouragement of public transport use must be supported by improvements to the transport infrastructure.

• Unless a viable transport alternative is found, additional homes in Bromley should not be allowed, if cars are discouraged and the rail system is at capacity.

• Should include improved rail/tram/DLR links, specifically rapid transport connections North and to the West.

• Should include development of cycle lanes.

• The Environment Agency support objectives and suggest additions relating to enhancing existing and securing new public transport facilities /network and seeking developer / other contributions.

Suggested Additional Objectives

• The GLA highlight ‘Lifetime Neighbourhoods’ as an overarching objective for many of the neighbourhoods’ issues highlighted in the area profiles.

• “Working with local people, businesses and partner organisations”. The Environment Agency note that such work is critical to delivery of the strategy and suggest objectives to ensure all sections of society have opportunities and knowledge to engage effectively with Council to create better places.

• Disability Voice would like a clear commitment to “Accessible Bromley for all Disabled People” including commitment to engaging a Council Access Officer and require developers to employ an Access Consultant.

4.6 Having been considered by the Local Development Framework Advisory Panel and Development Control Committee in November 2011 these representations informed the development of the 2013 Options and Preferred Strategy Document where they were reflected within the amended and expanded Vision and Objectives and the range of options.


4.7 The Government sought to streamline and simplify the plan making process with the introduction of ‘Local Plans’, and in March 2012 published the National Planning Policy Framework (NPPF) alongside the Planning Policy for Traveller Sites (PPTS). The Town and Country Planning (Local Planning) (England) Regulations came into force in April.

4.8 The adopted documents (Bromley Town Centre Area Action Plan, and the Supplementary Planning Documents: Affordable Housing, and Planning Obligations) within the Local Development Framework continued to form part of Bromley’s development plan together with the ‘saved’ Unitary Development Plan (UDP) policies and the London Plan (July 2011). However, rather than continue with the Local Development Framework suite of documents approach, the emerging work was taken forward in the new format sought by the NPPF, expanding the Core Strategy into a full Local Plan.
4.9 The Development Control Committee (28th June 2012) considered the implications of the NPPF, with draft advice from the LDFAP, and agreed the preparation of a Bromley Local Plan, incorporating the earlier development and consultation of the Core Strategy Issues Document in 2011.

4.10 The emerging Options and Preferred Strategy, which responded to the representations the Core Strategy Issues Document, was developed throughout 2012. With support from the LDFAP, the draft Options and Preferred Strategy was considered by Development Control Committee (DCC) in July 2012, further developed and recommended for consultation by DCC in January 2013.

5 Options and Preferred Strategy (2013) (Regulation 18 Consultation)

5.1 With recommendation from Development Control Committee, the ‘Options and Preferred Strategy Document’, accompanied by an Interim Sustainability Appraisal, was agreed for consultation by the Executive on 6th February 2013. The consultation ran for just over 6 weeks from 1st March – 15th April 2013.

Consultation

5.2 Once again the web-based consultation, supported by the activities outlined in section 2.5, was undertaken by the Council. The online consultation portal enables people to respond to specific options and make their own comments as they progressed through the document.

5.3 The Council ensured that the new Town and Country Planning (Local Planning) (England) Regulations 2012 were complied with. Notably consultation with bodies included those representing the interest of disabled persons, the interests of different racial, ethnic or national groups, and interests of persons carrying on business in the LPA’s area and specific consultation bodies which for Bromley include the Greater London Authority (GLA), the Environment Agency, Natural England, Network Rail, the Highways Agency, and authorities that adjoin any part of Bromley.

Representations to the ‘Options and Preferred Strategy’ Consultation

5.4 Summaries of the 78 representations were reported to Development Control Committee 20th June 2013, and along recommended responses formulated in light of the Interim Sustainability Appraisal (2013) and the Equality Impact Assessment / Health Impact Assessment (2013). The detailed summaries are set out in Appendix 1g). A number of issues were raised in respect of the ‘Soundness’ of the plan in terms of ‘general conformity’ with The London Plan 2011, specifically

5.5 Housing
- The annual housing target of 470 (preferred option 1) was criticised as not meeting ‘objectively assessed housing need’ as required by the
National Planning Policy Framework (NPPF), ‘not being in conformity’ with the London Plan (2011) and not reflecting that London’s population (including Bromley’s) is growing faster than previously expected’. While Bromley is part of a wider South East London housing market and a 2009 Sub-regional Strategic Housing Market Assessment (SHMA) was prepared to meet Government planning guidance, it was suggested that an updated assessment for the Borough is prepared to meet the NPPF requirements.

Council Response and next stage of plan development: The ‘target of 470 homes’ was clarified as ‘at least 470 homes’ in the subsequent 2014 Draft Policies and Designations Document

- Density – in particular local residents associations and residents groups emphasised the importance of retaining the Borough’s character, there is concern that this limits the amount of housing and therefore the Council will need to consider additional sites for housing to meet need/London Plan targets. The GLA comments that higher density can be delivered in outer London locations in sensitive ways.

Council Response and next stage of plan development: Density and character representations addressed through the housing design policy in the subsequent 2014 Draft Policies and Designations Document

Parking
- The GLA raised the issue of non-conformity with the London Plan regarding Preferred Option 52 which set out a minimum parking expectation for residential development. The London Plan sets out maximum levels.

Council Response and next stage of plan development: Continued negotiation with the GLA in respect of parking and reflected in subsequent consultations.

Commercial Land and Premises
- Comments included reference to the full range of business (B1) use classes being appropriate in business areas (Preferred Option 89 directs large offices to town centres), and for some business areas, to be partially de-designated for instance Scotts Road, (part of the Farwig Business Area), and Crayfields, off Sevenoaks Way or a more flexible approach taken to allow residential or employment generating uses such as crèches and health facilities.
- The GLA highlighted potential conformity issues if the Council takes an over protective stance to offices and others make comments on the contribution vacant business premises can make to housing and other uses.
- The need to maintain the vitality of the town centres was raised in considering the development of policies and boundaries for the town centres, and for the primary and secondary frontages, specifically in relation to the increased permitted development rights for non-retail use in vacant shops.
Council Response and next stage of plan development: a suite of office, employment and town centre policies addressing the points raised developed for subsequent consultations.

Environmental Challenges
- flexible and non-prescriptive policies sought to ensure that new development can incorporate future advances in carbon reduction/renewable technology
- recognition of viability implications to ensure that new development is not prevented from coming forward.
- The Environment Agency highlighted the need for an up to date flood risk assessment
- The GLA highlight a risk of non-conformity if agreement with other Boroughs does not deliver sufficient waste sites.

Council Response and next stage of plan development: Policies developed for subsequent consultations, supported by up to date flood risk information. Partnership working with the South East London Waste Partnership

5.6 The representations were considered by the LDFAP and by the Development Control Committee in June 2013. It was agreed that, responding appropriately to representations the plan be progressed to draft policies and site allocations, with key issues and areas of potential non-conformity with the London Plan considered by the Local Development Framework Advisory Panel (LDFAP) and DCC.

5.7 Although not sought through this consultation a number of owners/developers put forward sites, to deliver the Local Plan, primarily but not exclusively for residential use.

5.8 In light of the substantial changes introduced by the NPPF and other changes including, the Community Infrastructure Levy (CIL) and a greater range of permitted development rights, the Council reviewed its Local Development Scheme (LDS). The revised LDS, which sets out the Council’s timetable for plan development, was considered by Development Control Committee in September 2013 and recommended to the Council Executive who endorsed it in October 2013. The LDS reflects the recent planning reforms, the Council’s resources and lessons from other authorities and Inspectors’ reports regarding timescales, and the necessity for authorities to demonstrate plans are based on objective and up to date evidence to be found ‘sound’.

5.9 During the Autumn of 2013 the LDFAP considered the development of draft policy approaches in light of representations to the Preferred Strategy and Options document.

5.10 With support from the LDFAP, the Draft Policies and Designations Document’ was considered by Development Control Committee in January 2014 and recommended for consultation.
6 Draft Policies and Designations (2014) (Regulation 18 Consultation)

6.1 With recommendation from Development Control Committee, the ‘Draft Policies and Designations Document 2014’, was agreed for consultation by the Executive on 15th January 2014, with the consultation running for 6 weeks from 10th February - 24th March 2014. The basis of the consultation as set out in para 2.5.

6.2 The Draft Policies and Designations Document 2014 developed the preferred strategy, and set out draft planning policies and designations to deliver the Local Plan Vision and Objectives (including enhanced the transport objectives). This consultation also included a Call for Sites inviting the submission of sites, for assessment to help deliver the emerging Local Plan’s Vision and Objectives.

6.3 The Council received over 100 responses to the consultation and over 50 completed ‘Call for Sites’ forms. The representations and the Council’s response and the development of the Draft Allocations, Further Policies and Designations (2015) were considered by the LDFAP. The representations and responses to these two consultations and to the Local Green Space consultation (2016) were considered at the Development Control Committee in July 2016. Links to the representations summaries and council responses are set out in Appendix 3.

The London Plan : Further Alterations to the London Plan (FALP January 2014)

6.4 The Council’s Draft Policies and Designations consultation in Spring of 2014, coincided with the Mayors consultation on his Further Alterations to the London Plan, to which the Council made representations. In March 2015 the LDFAP were updated on the FALP and the Bromley consultation which was still underway.

6.5 During 2014 and 2015 the LDFAP gave consideration to representations to the Draft Policies and Designations consultation including potential allocations as well as updated evidence (South East London SHMA 2014), S106, Community Infrastructure Levy (CIL), Local Plan Viability Assessment and the 2015 London Plan, published in March 2015.

6.6 In line with the vision and objectives in the earlier local plan documents and responding to the 2014 consultation and updated evidence bases a ‘Draft Allocations, Further Policies and Designations’ document was developed. The document included allocations, a limited number of new and revised policies and designations within the London Plan (2015), notably, the designation of Bromley Town Centre as an Opportunity Area, a revised minimum housing figure and the identification of Crystal Palace as a Strategic Outer London Development (SOLD) Centre.
6.7 The ‘Draft Allocations, Further Policies and Designations’ document was considered by Development Control Committee in July 2015 and recommended for consultation.

7 Draft Allocations, Further Policies and Designations (2015) (Regulation 18 Consultation)

7.1 With recommendation from Development Control Committee, the ‘Draft Allocations and Further Policies and Designations Document 2015’, was agreed for consultation by Executive on 15th July 2015, with the consultation running for 6 weeks up to 31st October 2015. In addition to the consultees on the database, consultation letters were sent to all addresses within 100m of any of the proposed allocations drawing their attention to the Local Plan process and the presence of a proposed allocation locally. (See Appendix 4)

7.2 The Council received over 1000 responses to the 2015 consultation document. Many of these were in response to individual proposed site allocations.

7.3 During the Autumn of 2015 the LDFAP were apprised of the initial responses to the consultation as well as the implications of
   - the updated National Planning Policy for Travellers,
   - ministerial statement on Local Plans (July 2015),
   - the Health and Wellbeing Strategy.

7.4 The LDFAP also considered updates on Statement of Community Involvement, Community Infrastructure Levy (CIL) and Local Plan Viability Assessment and Local Green Space criteria. A specific Local Green Space Consultation was considered and recommended by Development Control Committee in December 2015.

8 Local Green Space (LGS) Consultation 2016 (Regulation 18 Consultation)

8.1 The LGS consultation, was agreed by Executive on 13th Jan 2016, and ran between 10th February 2016 and 23rd March 2016.

8.2 The LGS consultation provided the opportunity to comment on the draft Local Green Space policy, draft Local Criteria for the Designation of Local Green Space and to nominate a sites to be considered by the Council for Local Green Space designation.

8.3 48 nominations for sites for assessment as Local Green Space were received. Together with comments on the Draft Local Green Space policy, methodology and criteria.
9 **Response to regulation 18 representations**

9.1 The staged approach to Local Plan development enabled the Council to front load work with early and ongoing engagement. This maximised opportunities for residents, statutory and other partners to respond to, and inform the development of policy throughout the process helping to ensure evolved policies and proposals for consultation under Regulation 18 and propose a robust and ‘sound’ plan for submission to the Secretary of State.

9.2 Appendix 1 sets out a record of member engagement, committee recommendations and Council decision making throughout the entire process, and appendices 1a – 1n detail the public consideration of representations and the development of the Local Plan.

9.3 The evolved policies were consulted on under Regulation 18 in three main documents. As described in sections 6, 7 and 8 above. The majority of Local Plan policies were consulted on in 2014. The subsequent 2015 and 2016 consultations proposed allocations and / or designations with related new or amended policies

- Draft Policies and Designations (2014) and
- Local Green Space Consultation (2016)

9.4 During the spring of 2016 the LDFAP considered the representations received to both, the Draft Allocations, Further Policies and Designations (2015), and the Local Green Space (LGS) Consultation 2016.

9.5 The responses to these two consultations were presented to, and considered by, Development Control Committee in July 2016 along with the earlier 2014 consultation representations. Links to the table of representations and officer recommendations in respect of amendments to produce the Proposed Submission Draft Local Plan are set out in Appendix 3. The committee considered these representations (Appendix 1k) and recommended the Proposed Submission Draft Local Plan (2016) for consultation under Regulation 19. The update to the Statement of Community Involvement was also recommended.

10 **Proposed Submission Draft Local Plan (2016)**

10.1 With recommendation from Development Control Committee, the ‘Proposed Submission Draft Local Plan’, was agreed for consultation by Executive on 20th July 2016, “subject to the Chief Planner, in consultation with the Leader of the Council, being authorised to make alterations and finalise supporting documents as required prior to its publication.” Following authorisation the Regulation 19 consultation on the Proposed Submission Draft Local Plan took place between 14th November and 31st December 2016.
Regulation 19 - Methods of Engagement

10.2 The Regulation 19 consultation built upon the well-established channels of engagement developed through the previous 4 consultations.

10.3 The consultation encouraged responses on-line via a dedicated portal accessed via the Council’s website Developing Bromley's Local Plan, and promoted on the front page of the Bromley website and via other methods previously outlined notably.

- Publicity through press releases, articles and adverts in the Bromley Times, News Shopper, Bromley Borough News and Biggin Hill News.

- Promotional material including A4 posters and A5 flyers and hard copies of the Proposed Submission Draft Local Plan were made available across the Borough, in Council offices and reception points and at all council libraries and Community House (Community Links Bromley). Leaflets were also distributed via Cotmandene and Mottingham Outreach Centres and other community venues.

- Consultation letters/emails to over 1,500 contacts - residents, agents and others registered on the planning department’s consultation database (including registrations though the online consultation portal)

- Presentations were made to residents associations at the annual Residents Seminar (Saturday 19th November 2016) and to Bromley Youth Council (13th October 2016) and attendance at the Mottingham Big Local ‘Refreshing the Partnership’ event (12th December 2017)
  
  - Promotion through the Borough Officers Group (with representatives of the Borough’s main strategic partners, namely, Bromley Clinical Commissioning Group, London Fire Brigade, Met Police Service, Department of Work & Pensions, Community Links Bromley, London South East Colleges.
  
  - the Economic Partnership (quarterly, including the Chamber of Commerce, Community Links Bromley, Bromley Education Business Partnership, London South East Colleges, Federation of Small Businesses and other business stakeholders including “Your Bromley” BID, “Orpington 1st BID.

  - Property Agents Forum (commercial property agents, typically 2-3 times a year)

- Articles and links to the document in Bromley Community Links e-bulletin

- Information sent to partner organisations for circulation, including health organisations / facilities and housing providers.

- advertised through the staff intranet (many staff are also resident in the Borough)
and direct telephone access to the Local Plan team, advertised through all consultations listed above.

10.3 In November 2016, during the Regulation 19 consultation period, Development Control Committee and Executive approved the Revised Local Development Scheme which signals the Council’s intention is to review Bromley Town Centre Area Action Plan once the Local Plan is adopted.

11 Regulation 20 Representations and Responses

11.1 The Council received over 600 representations from over 200 individuals, groups or organisations. The mains issues raised related to

Housing
Duty to Cooperate
- Between the borough and its London neighbours and
- With local authorities outside London
Consultation procedures
- Engagement with local house builders
- Consultation with residents near allocated sites
- Local Green Space consultation the public was not properly consulted
Housing supply methodology
- Difference between OAN and LP target
- Use of windfalls, lapse rates etc
- Deliverability of individual (named or allocated) sites
- Land availability – Green Belt review/ economic land review
- Sustainability Appraisal
- Role of the AAP and deliverability of sites in the Opportunity Area
- Affordable housing policy
- Other housing policies – over-restrictive, likely to discourage densification?

Travellers
Exceptional circumstances for de-designation of Green Belt land

Education
- Methodology for site allocations
- Exceptional circumstances for de-designation of Green Belt and MOL
- Building on designated open spaces and playing fields
- Unsuitability of individual sites

Transport
Residential parking standards

Open space and natural environment
Local Green Space
- The whole of the historic Queens Gardens in Bromley is proposed for designation as Local Green Space but LaSalle Investment wish for potential for further development in the indicative development area indicated in the AAP to be signposted
- The Diocese of Rochester oppose the designation of Bull Lane Allotments as Local Green Space mainly because they can end the lease.
- Some sites are deemed not to have been considered or assessed in a sound or justified way.

Methodologies for Green Belt/ MOL changes

**Designated employment land**

Evidence of need to support designations

**Town centres/ retail**

Lack of flexibility and support for other town centre uses

**Biggin Hill SOLD C**

- Exceptional circumstances for Green Belt release
- Request for additional Green Belt release
- Sustainability Appraisal

**Environmental challenges**

Viability of zero carbon policy

11.2 During the spring of 2017 the LDFAP considered representations on the Proposed Submission Draft Local Plan. Links to summaries of the representations and responses are found in Appendix 3.

11.3 Development Control Committee and Executive, on the 12th and 20th of June 2017 respectively, considered the representations and minor modifications. On 26th June 2017 Full Council agreed the submission of the Draft Local Plan to the Secretary of State.
## 12 Consultation Check Lists

12.1 Tables 1 and 2 provide a summary check of consultation activities undertaken throughout the plan making process.

<table>
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</thead>
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<tr>
<td><strong>Statement of Community Involvement (SCI) 2016</strong></td>
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<td>Council Website</td>
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<td>Consultation Portal</td>
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<tr>
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<td>√</td>
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<td>√</td>
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<tr>
<td>Surveys / Questionnaires</td>
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<td>√</td>
<td>√</td>
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<td>√</td>
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<tr>
<td>Database Notification</td>
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<tr>
<td>Local Specialist Press</td>
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<td>Flyers / posters</td>
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<tr>
<td>Displays</td>
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<td>√</td>
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<tr>
<td>Contact with hard to reach groups</td>
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<td>√</td>
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<tr>
<td><strong>Additionally from Statement of Community Involvement (SCI) 2006</strong></td>
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<td>Residents associations</td>
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<td>√</td>
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<tr>
<td>Businesses</td>
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<tr>
<td>Developers/ Agents / Landowners</td>
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<tr>
<td>Strategic Bodies and Groups</td>
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<tr>
<td>Central / Regional / Local Government</td>
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<td>Local Strategic Partnership</td>
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<td>√</td>
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<td>√</td>
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<tr>
<td>Local Community Groups</td>
<td>√</td>
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</tbody>
</table>
**Table 2: Range of Consultation Methods**  

<table>
<thead>
<tr>
<th>Method</th>
<th>Details</th>
</tr>
</thead>
</table>
| Council Website                | Main website [www.bromley.gov.uk](http://www.bromley.gov.uk)  
Developing Bromley’s Local Plan Webpage  
| Consultation Portal            | Consultation Portal Homepage (links to all consultation stages)  
[http://bromley-consult.objective.co.uk/portal](http://bromley-consult.objective.co.uk/portal) |
| Available for inspection       | Bromley Civic Centre,  
Libraries - 14 local libraries (including The Central Library), Upper Norwood Joint Library (Crystal Palace library in neighbouring Lambeth Borough),  
Community Links Bromley |
| Surveys / Questionnaires       | Online via consultation portal  
Paper questionnaire – with plans available for inspection / available to download |
| Notification from database     | Self-registration online (email)  
Database, from previous plan making activity, call for sites, other requests for contact (letters) |
| Local / Specialist Press       | Bromley Times,  
News Shopper,  
Bromley Borough News,  
Biggin Hill News magazine |
| Social Media                   | Facebook [https://www.facebook.com/LBBromley/](https://www.facebook.com/LBBromley/)  
Twitter [https://twitter.com/LBofBromley?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor](https://twitter.com/LBofBromley?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor) |
| Flyers / posters (provided for distribution / display) | At sites where available for inspection as detailed above  
Cotmandene and Mottingham Outreach Centres  
Bromley Adult Education College,  
Myme leisure centres  
Police stations  
Town Centre managers |
<table>
<thead>
<tr>
<th>Displays</th>
<th>Bromley Civic Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Contact with hard to reach groups</strong></td>
<td></td>
</tr>
<tr>
<td>Bromley Youth Council</td>
<td></td>
</tr>
<tr>
<td>Disability Voice and mobility forums</td>
<td></td>
</tr>
<tr>
<td>Faith groups (various individual and collective on database)</td>
<td></td>
</tr>
<tr>
<td>Black and Ethnic Minority (Asian) social group</td>
<td></td>
</tr>
<tr>
<td>Gypsy and Travellers Project</td>
<td></td>
</tr>
<tr>
<td>London Gypsy Traveller Unit</td>
<td></td>
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<tr>
<td><strong>Residents associations</strong></td>
<td></td>
</tr>
<tr>
<td>Annual Residents Seminars</td>
<td></td>
</tr>
<tr>
<td>Bromley Residents Federation meeting</td>
<td></td>
</tr>
<tr>
<td>staff intranet (many staff are also resident in the Borough)</td>
<td></td>
</tr>
<tr>
<td><strong>Businesses</strong></td>
<td></td>
</tr>
<tr>
<td>the Economic Partnership (quarterly, including the Chamber of Commerce,</td>
<td></td>
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<tr>
<td>Community Links Bromley,</td>
<td></td>
</tr>
<tr>
<td>Bromley Education Business Partnership,</td>
<td></td>
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<tr>
<td>London South East Colleges,</td>
<td></td>
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<tr>
<td>Federation of Small Businesses</td>
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<tr>
<td>Your Bromley BID,</td>
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<tr>
<td>Orpington 1st BID;</td>
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<tr>
<td>other business stakeholders</td>
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<tr>
<td>Property Agents Forum (commercial property agents, typically 2-3 times a</td>
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<tr>
<td>annual)</td>
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<tr>
<td>Bromley’s business e-bulletin</td>
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<tr>
<td><strong>Developers/ Agents / Landowners</strong></td>
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<tr>
<td>Past interest / database</td>
<td></td>
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<tr>
<td>Pre-application site agents</td>
<td></td>
</tr>
<tr>
<td>Call for sites (2014)</td>
<td></td>
</tr>
<tr>
<td><strong>Strategic Bodies and Groups</strong></td>
<td></td>
</tr>
<tr>
<td>Prescribed Bodies as set out in the Localism Act (2011) see para 2.7 and</td>
<td></td>
</tr>
<tr>
<td>The Council’s Duty to Co-operate Statement 2017</td>
<td></td>
</tr>
<tr>
<td>See Local Strategic Partnership below</td>
<td></td>
</tr>
<tr>
<td>Public Health (collaboration with the Joint Strategic Needs Assessment)</td>
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<tr>
<td>Ambulance Service</td>
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<tr>
<td><strong>Central / Regional / Local</strong></td>
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<tr>
<td>As set out in The Council’s Duty to Co-operate Statement 2017</td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Groups</td>
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<tr>
<td>--------------------------------</td>
<td>------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Local Strategic Partnership</td>
<td>Local Strategic Partnership (pre May 2013),</td>
</tr>
<tr>
<td></td>
<td>Bromley Primary Care Trust</td>
</tr>
<tr>
<td></td>
<td>Affinity Sutton Homes</td>
</tr>
<tr>
<td></td>
<td>Bromley Borough Police</td>
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<td></td>
<td>Community Links</td>
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<tr>
<td></td>
<td>Community Links Bromley</td>
</tr>
<tr>
<td></td>
<td>Borough Officers Group (post May 2013)</td>
</tr>
<tr>
<td></td>
<td>Bromley Clinical Commissioning Group</td>
</tr>
<tr>
<td></td>
<td>London Fire Brigade</td>
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<tr>
<td></td>
<td>Met Police Service</td>
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<tr>
<td></td>
<td>Department of Work &amp; Pensions</td>
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<tr>
<td></td>
<td>Community Links Bromley</td>
</tr>
<tr>
<td></td>
<td>London South East Colleges</td>
</tr>
<tr>
<td>Local Interest / Community</td>
<td>See Hard to reach groups above</td>
</tr>
<tr>
<td>Groups</td>
<td>Healthy Weight Forum’</td>
</tr>
<tr>
<td></td>
<td>Mottingham Big Local</td>
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<tr>
<td></td>
<td>Cray Valley Community Forum</td>
</tr>
<tr>
<td></td>
<td>Allotment Holders Panel</td>
</tr>
<tr>
<td></td>
<td>Bromley Biodiversity Partnership Group</td>
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</table>
Appendix 1

Record of member engagement, committee recommendations and Council decision making

<table>
<thead>
<tr>
<th>Committee / Grouping</th>
<th>Activity</th>
<th>Date</th>
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</thead>
<tbody>
<tr>
<td>Corporate Invitees</td>
<td>Community Strategy workshop</td>
<td>June 2008</td>
</tr>
<tr>
<td>Stakeholders</td>
<td>Local partnerships spatial issues workshop</td>
<td>22nd Sept 2008</td>
</tr>
<tr>
<td>DCC</td>
<td>Local Development Framework Advisory Panel (LDFAP) constituted</td>
<td>21st April 2009</td>
</tr>
<tr>
<td>North East Ward members</td>
<td>Workshops to consider the locally distinctive implications of change and develop with a view to developing a Core Strategy.</td>
<td>8th Dec 2009</td>
</tr>
<tr>
<td>North West Ward members</td>
<td></td>
<td>27th Jan 2010</td>
</tr>
<tr>
<td>Southern Ward members</td>
<td></td>
<td>17th Feb 2010</td>
</tr>
<tr>
<td>LDFAP</td>
<td>Consideration of the evidence from the member workshops, Place and character appraisal feedback, Approach to developing the Core Strategy Issues Document (including using 21 area pen portraits)</td>
<td></td>
</tr>
<tr>
<td>DCC</td>
<td>Considered and agreed the structure and approach to preparing the Core Strategy Issues Document (including Pen Portraits)</td>
<td>8th March 2011</td>
</tr>
<tr>
<td>LDFAP</td>
<td>Consideration of Core Strategy Issues Document</td>
<td></td>
</tr>
<tr>
<td>DCC</td>
<td>Consideration of Core Strategy Issue Document (Pen Portraits)</td>
<td>19th April 2011</td>
</tr>
<tr>
<td>CONSULTATION</td>
<td>Core Strategy Issue Document</td>
<td>8th July – 3rd October 2011</td>
</tr>
<tr>
<td>LDFAP</td>
<td>Consideration of representations to the Core Strategy consultation</td>
<td></td>
</tr>
<tr>
<td>DCC</td>
<td>Consideration of responses to the Core Strategy consultation</td>
<td>17th Nov 2011</td>
</tr>
<tr>
<td>LDFAP</td>
<td>Consideration of Preferred Strategy and Options</td>
<td></td>
</tr>
<tr>
<td>DCC</td>
<td>Consideration of options / preferred options on a number of topics.</td>
<td>28th June 2012</td>
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<tr>
<td>LDFAP</td>
<td>Consideration of Preferred Strategy and Options</td>
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<tr>
<td>DCC</td>
<td>Consideration of options / preferred options on a number of topics.</td>
<td>26th July 2012</td>
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<tr>
<td>LDFAP</td>
<td>Consideration of Preferred Strategy and Options</td>
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<tr>
<td>DCC</td>
<td>‘Options and Preferred Strategy Document’ considered and recommended</td>
<td>29th Jan 2013</td>
</tr>
<tr>
<td>Executive</td>
<td>‘Options and Preferred Strategy Document’ and Interim Sustainability Appraisal considered and endorsed for consultation</td>
<td>6th Feb 2013</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td></td>
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<tr>
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<tr>
<td>20\textsuperscript{th} June 2013</td>
<td>Consideration of responses to the Preferred Strategy and Options consultation</td>
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<tr>
<td>12\textsuperscript{th} Sept 2013</td>
<td>Revised Local Development Scheme considered and recommended</td>
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<tr>
<td>16\textsuperscript{th} Oct 2013</td>
<td>Revised Local Development Scheme considered and endorsed for consultation</td>
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<td>7\textsuperscript{th} Jan 2014</td>
<td>'Draft Policies and Designations Document' considered and recommended</td>
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<tr>
<td>15\textsuperscript{th} Jan 2014</td>
<td>'Draft Policies and Designations Document' considered and endorsed for consultation</td>
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<tr>
<td>10\textsuperscript{th} Feb - 24\textsuperscript{th} March 2014</td>
<td>'Draft Policies and Designations Document'</td>
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<td>13\textsuperscript{th} July 2015</td>
<td>Draft Allocations and Further Policies and Designations document considered and recommended</td>
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<td>15\textsuperscript{th} July 2015</td>
<td>'Draft Allocations and Further Policies and Designations document' considered and endorsed for consultation</td>
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<td>17\textsuperscript{th} Sept - 31\textsuperscript{st} October 2015</td>
<td>Draft Allocations and Further Policies and Designations document</td>
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<td>26th June 2017</td>
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Development Control Committee (DCC) considerations leading to approval by Full Council of the Submission Draft Local Plan (2017)

Appendices

1a) 8 March 2011 DCC
Agreed the structure and approach to preparing the Core Strategy Issues Document (including Pen Portraits)

1b) 19 April 2011 DCC
Minutes of the consideration of Core Strategy Issue Document (Pen Portraits) (endorsed by Executive 25th May 2011)

1c) 17 November 2011 DCC
Summarised representations reported to DCC and minutes of the consideration of responses to the Core Strategy consultation

1d) 28 June 2012 DCC
Minutes of the consideration of options / preferred options on a number of topics.

1e) 26 July 2012 DCC
Minutes of the consideration of options / preferred options on a number of topics.

1f) 29 January 2013 DCC
‘Options and Preferred Strategy Document’ considered and recommended (endorsed by Executive 6th Feb 2013)

1g) 20 June 2013 DCC
Minutes of the consideration of responses to the Preferred Strategy and Options consultation

1h) 7 January 2014 DCC
‘Draft Policies and Designations Document’ considered and recommended (endorsed by Executive 15th January 2014)

1i) 13 July 2015 DCC
Draft Allocations and Further Policies and Designations document considered and recommended (endorsed by Executive 15th July 2015)

1j) 10 December 2015 DCC
Minutes of the initial consideration of responses to the Draft Allocations and Further Policies and Designations consultation Local Green Space (local criteria for assessing potential sites) recommended for consultation. (endorsed by Executive 13th Jan 2016)

1k) 11th July 2016 DCC
Minutes of the consideration of representations to the Regulation 18 consultations and 'Proposed Submission Draft Local Plan' (regulation 19) recommended (endorsed by Executive 20th July 2016)

1l) 12 June 2017 DCC
Minutes of the consideration of representations to the Regulation 19 consultation. Endorsement for submission to the Secretary of State subject to agreement by Executive and approval by Full Council

1m) 20th June Executive
Minutes of the consideration of representations to the Regulation 19 consultation. Agreement for submission to the Secretary of State subject to approval by Full Council

1n) 20th June Full Council
Minutes of the consideration of representations to the Regulation 19 consultation. Approval for submission to the Secretary of State.
DEVELOPMENT CONTROL COMMITTEE  
Minutes of the meeting held at 7.30 pm on 8 March 2011

CORE STRATEGY - LOCAL AREAS, STRATEGIC THEMES AND ISSUES
In January 2011, the Local Development Framework Advisory Panel (LDFAP) endorsed the approach taken on the development of a Core Strategy Issues Document. The LDFAP also requested that Development Control Committee consider the developing Bromley Borough area pen portraits and overall structure and approach of the document which would be issued for consultation purposes in preparation for the development of Bromley’s Core Strategy. The Core Strategy would form the principal policy within the suite of documents constituting the Local Development Framework (LDF).

The report contained draft outlines of the key elements proposed for the Core Strategy Issues Document; visions and objectives for the Borough; 13 of the 21 area pen portraits (a further 3 area pen portraits were e-mailed to Members and were also circulated separately before the meeting) and strategic issues and themes. The remainder of the pen portraits would be available for Member comments at the next meeting of the Development Control Committee on 19 April.

Mr McQuillan, Chief Planner, gave a brief outline of the report and reminded Members that the document was not yet complete. Member comments would be reported to a meeting of the LDFAP on 24 March (which has since been moved to a proposed new date of 4 May 2011). Meanwhile, Members could forward any comments or amendments direct to Mr McQuillan by 24 March).

A final decision on the document would be taken by the Executive Committee at a meeting to be held on 25 May.

The area pen portraits were a direct result of three workshops held in 2009/2010 and although the depicted areas were not an exact mirror of existing Ward boundaries, they were detailed enough for Members to determine relevant issues within particular Wards.

Member views and suggested amendments for the three appendices are set out below.

Appendix 1 - Bromley in 2025
Community facilities (page 18) - Members were disappointed to note that reference to libraries had been omitted but were mindful of the current situation with regard to the intended closure of some Ward facilities. It was agreed that libraries would be referred to where appropriate.
Built Heritage (page 19) - The first sentence was amended to read: ‘Our manmade heritage assets - areas of distinctive character, listed buildings, conservation areas and monuments - are protected and enhanced. It was
agreed that a further objective be added to read: ‘Encourage a proactive approach to the improvement of heritage assets’.

*Climate Change and environmental issues (page 19)* - Councillor Fawthrop suggested that the objective ‘Ensure carbon reduction is a priority of any new development’, should be more specific. Councillor Fawthrop also alluded to the fact that no mention had been made about the use of methane or other deadly greenhouse gases. Mr McQuillan responded that the use of such gases would be covered by the first objective ‘Design and construct any new buildings to help reduce impacts of a changing climate’.

*Transport (page 19)* - Councillor Fawthrop stated that while it was good to encourage the use of public transport, it should not be promoted at a time when savings in public finances were to be made. It was suggested that it be clearly noted in the objectives that the Council welcomed and valued car ownership.

Mr McQuillan reported that the transport objectives had been approved by the Local Implementation Plan for Highways. It was agreed that the objective ‘Promote the use of public transport, walking and cycling’ be amended to read ‘Encourage the use of public transport, walking and cycling including new modes of transport’.

The fourth sentence of the description should be amended to read: ‘Any new developments should, where appropriate, include electric vehicle charging points and more car clubs, increasing transport choices for local people.’

*Business and employment (page 18)* - Councillor Russell Mellor was concerned at the lack of manufacturing businesses being established in Bromley. Members agreed that a further objective be added to read: ‘Encourage an adequate supply of commercial land in the Borough’.

*Open Space (page 17)* - Councillor Lydia Buttinger sought clarification on the meaning of ‘open space’. Mr McQuillan responded that ‘open space’ referred to both open and natural land. It was agreed that the title be amended to read ‘Open and Natural Space’. Councillor Buttinger was disappointed to note that the protection of trees had not been included as an objective. It was agreed that the first objective be amended to read: ‘Protect open spaces, natural environments and trees.’.

*Town centres (page 18)* - Councillor Will Harmer was surprised to note that nightlife was not alluded to as it contributed hugely to the prosperity of town centres. It was agreed that a further objective be added to read: ‘Encourage a safe and prosperous evening economy.’.

Councillor Mrs Manning was disappointed to note that Appendix 1 did not give sufficient emphasis to the high quality open space, 50% of which is Green Belt land, the 40 conservation areas and the number of listed and locally listed buildings within the Borough. Mr McQuillan agreed to redraft the description to include the above points.

*Housing (page 18)* - The Chairman suggested (and it was agreed), that the third objective be amended to read: ‘Ensure any new housing development..."
complements and respects local character in terms of design, density and car parking.’.

Appendix 2 - Area Pen Portraits

Beckenham Copers Cope and Kangley Bridge (page 23) - As Ward Member for Copers Cope, Councillor Russell Mellor commented that the report was comprehensive but he had doubts concerning the accuracy of the first paragraph on page 24. With regard to the second paragraph, Councillor Mellor stated that the loss of the Dylon factory was very disappointing. He emphasised the need for industrial estates to be retained and underlined the importance of maintaining a balanced planning policy. There was a demand for a large number of schools but there was only limited amount of open space. The introduction of the Copers Cope parking zone had proved to be successful and Councillor Mellor commented on the need for further car parking areas and suggested the introduction of underground car parks. The lower section of the area toward Clock House was dense and there was no room for development unless buildings were demolished. Councillor Mellor queried whether statistical evidence backed up statements in the report.

Bickley (page 27) - no comments.

Bromley Common (page 30) - As Ward Member, the Chairman made the following comments:-
Paragraph 1 of the section entitled ‘Character’, should make reference to the new development at the former Blue Circle site. The Chatterton Village area combines residential, retail and small industrial areas. However, there had been a decline in the number of industrial units, most of which had been converted into residential units. The Chairman felt that small industrial areas needed to be encouraged. There was no mention of the new Controlled Parking Zone (CPZ) in the Chatterton Road area. Reference to the CPZ in and around Chatterton Road would be inserted in the ‘Connectivity’ section of the report. Although generally opposed to applications for developments on Green Belt land, the major development on Crown Lane would yield additional social infrastructure i.e. extra care housing and a much needed new surgery. The words ‘and Higher Education’ should be deleted from the first line on page 31.

Chislehurst (page 33) - Referring to Demography and Community on page 33, Ward Member Councillor Katy Boughey, questioned the accuracy of the statement that ‘the northern part of the area suffers from higher levels of deprivation than the rest of the area’. Councillor Boughey suspected that Mottingham had been included as part of the pen portrait and suggested that Mottingham did not form part of the Chislehurst pen portrait area. Mr McQuillan confirmed that it was very difficult to separate the two areas as they were, in effect, overlapping. Councillor Boughey reported that there were no opportunities to reduce
congestion around the War Memorial. As a result, it was agreed that the final question under the ‘Key Issues and Main Opportunities’ section be deleted. Alluding to the problems of parking in the High Street and the surrounding areas, Councillor Boughey made reference to the bus stop outside Sainsbury’s supermarket which caused traffic congestion at Willow Grove and the High Street. A possible solution was to move that particular bus stop. Elderly residents in Mottingham were quite often isolated and living in accommodation too large for their needs. Councillor Boughey suspected that those residents may relinquish their accommodation if alternative housing was to be made available to them.

With reference to connectivity it was noted that residents of Bickley travelled to Chislehurst for trains to London Charing Cross, and residents of Chislehurst travel to Bickley for trains to London Victoria.

Clock House, Elmers End and Eden Park (page 36) - Ward Member for Clock House, Councillor Reg Adams, commented that the pen portrait was well written but a reference to libraries had been omitted from the description. Councillor Adams stated that connectivity in the area was excellent with access to trams and mainline London railway terminals. For the purposes of clarity it was suggested (and agreed) that the first two sentences of the section entitled ‘Connectivity’ should be amended to read: ‘The 3 areas designated on the map had a good range of public transport links to neighbouring boroughs and Central London, although public transport to Bromley Town Centre is limited to four bus routes. Clock House, Elmers End and Grove Park have rail stations on the Hayes to Charing Cross line which link to the Docklands Light Railway at Lewisham.

In response to the questions within the key issues and main opportunities section, Councillor Adams reported the following:

**Question 1** - The suburban residential character of the area could be maintained with the use of light industry employing people who live locally, as with the existing Rowden Works (which should be mentioned within the report). Currently, with the great availability of public transport many people commuted to London.

**Question 2** - A Controlled Parking Zone was in existence but parking pressures were immense, particularly around the hospital, the spa and library. Urging the Council to think innovatively, Councillor Adams agreed with Councillor Mellor’s suggestion of underground parking.

**Question 5** - The site at Churchfields (formerly belonging to NPower) had lain vacant for more than 10 years. It would be great to see the site reoccupied or redeveloped.

**Question 6** - Several schools within the area were changing to academy status and the report should to be amended to reflect this.

As Ward Member for Kelsey and Eden Park, Councillor Peter Dean gave the following responses to the questions on key issues and main opportunities:

**Question 1** - The area was urban in the extreme. Accommodation consisted of terraced and semi-detached housing. There were no flats. The majority of submitted planning applications were for extensions only, as very little space was available to do anything more.

**Question 3** - There were five parks in the Ward which was a significant number considering the size of the area. All parks contained football pitches.
which were underused. The Council should encourage the use of sports grounds.

*Question 4*- There were a few vacant shops at Elmers End but by and large all shops were all well occupied.

*Question 5*- The 'Wellcome' site had recently been vacated and could be reused for commercial use. However it was possible that it would be developed for other purposes.

*Question 6*- Changes by the three secondary schools to academy status were a welcome improvement. The Chairman reported that the Studio Arts Centre was currently being refurbished and brought back into use.

*Cray Valley, St Paul's Cray and St Mary Cray (page 40)* - Ward Member for Cray Valley West, Councillor John Ince made the following observations:-

There were some inaccuracies within the report. While deprivation existed, it only occurred in small pockets, particularly in the St Paul's Cray, St Mary Cray and Cotmandene areas. The area benefited from large amounts of open space i.e. to the north east there was farmland and Hobblingwell Woods, the top end of which was a habitat for wildlife. This should be highlighted within the report.

There were plans to incorporate a resource centre in Cotmandene Crescent. With reference to housing, Councillor Ince reported that St Paul's Cray had benefited hugely from the 'right to buy' policy. However, his weekly surgeries were full of housing association residents seeking help with unresolved maintenance problems. Many shops and public houses had closed down, to be replaced by high density housing.

There were small pockets of unemployment within the area.

With regard to 'Connectivity'(page 42), it was noted that trains from St Mary Cray do not run to St Pancras and reference to this should be deleted from the report.

It was agreed that the final paragraph on page 42 be amended to read:- ‘How can the quality of the housing stock be improved? Is additional residential development desirable or needed?’

It was agreed that the final question relating to Cray Valley Wanderers FC (page 43) be deleted.

*Crofton and Farnborough (page 45)* - Ward Member, Councillor Charles Joel requested that the Ward name be amended to read 'Farnborough and Crofton'. He commented that the area was great for country walks and this should be reflected in the report.

There were inaccuracies in references to:-

• the statistics on residents' ages;
• health;
• statistics for schools; and
• shopping centres/parades.

All major GP surgeries and bus termini should be clearly marked on all plans. Councillor Joel would send his views with suggested amendments to the Chief Planner.
Crystal Palace, Penge and Anerley (page 48) - Ward Member for Penge and Cator, Councillor Peter Fookes, asked what the economic impact would be if a major football club was to establish itself within the area. The following comments were also made by Councillor Fookes:-

- The report should reflect the existence of the new London Overground railway service;
- Health facilities were in need of improvement;
- Some prosperous areas did exist;
- There was no shortage of supermarkets; and
- It was good to see that Yeoman House was being redeveloped into an 83-bedroom hotel.

With reference to 'Social Infrastructure' (page 49) Councillor Adams suggested the amendment of the sixth line, second sentence to read:-

'Demand for primary school places has increased and the provision of school capacity in this area is complicated by the flow of pupils across Borough boundaries.'

The sentence beginning on the fifth line of the section entitled 'Connectivity' should be amended to read:- 'Crystal Palace, Penge West, Penge East and Anerley stations offer a range of routes to Victoria, London Bridge and East Croydon, as well as the new London Overground which links South East London with East London'.

The first sentence of the first paragraph in the section entitled 'Character' should be amended to read:- 'The far North West is dominated by Crystal Palace Park and the top of Sydenham Hill'.

Hayes (page 52) - Ward Member, Councillor Mrs Anne Manning requested that the Chief Planner send her a copy of the document via e-mail. Councillor Manning pointed out that the reference with regard to there being six bus routes was inaccurate as it was possible to travel to numerous places, with the exception of Beckenham. Referring to the third key issue, it was noted that Hayes does not have a town centre. Councillor Manning commented that employment opportunities could arise from existing premises on Hayes Common being reoccupied. In relation to transport, Councillor Mrs Manning hoped the railway line would be kept open and stated that there was not enough off-street parking provision within the area. Councillor Fawthrop commented that as Coney Hall was politically linked to Hayes, it would make sense for Hayes and Coney Hall to be tagged together. Councillor Mrs Manning agreed with this observation as residents in Coney Hall travelled to Hayes to shop and use the railway station.

Keston (page 55) - As Ward Member for Keston, the Chairman made the following comments:-

- references to deprivation within the area were inaccurate and the first sentence of the section entitled 'Business and Employment' should be deleted; and
- the existence of Keston Garden Centre in Oakley Road should be included in the employment section.
With regard to key issues and main opportunities, the Chairman commented that:

- the Keston Mark area was well served by buses but it would be helpful to have a route from Keston Village to the Princess Royal University Hospital;
- no opportunities existed to improve cycle routes in the area;
- the final key issue question should be amended to read: 'Is pressure for development eroding the special qualities of the Keston Park and Farnborough Park Conservation Areas?'. In response to the question, the Chairman stated that pressure for development was eroding the special qualities of the Keston Park and Farnborough Park Conservation Areas. In addition, the whole area bounded by Croydon Road, Oakley Road and Hastings Road was becoming urbanised by new developments, such as the new development on the former allotment site between Oakley Road and Gravel Road. There were concerns regarding the former allotment site on Croydon Road as it had lain redundant for many years. It was situated on Green Belt land and should not to be used to supply housing but returned to its original use or an appropriate Green Belt use.

**Mottingham (page 59)** - Councillor Fookes reported that the Coldharbour Leisure Centre was situated within Greenwich, not Lewisham as stated in the section on social infrastructure. This should be amended.

**Shortlands, Park Langley and Pickhurst (page 62)** - Pickhurst should be removed from the title as it was situated within Hayes. It was requested that more emphasis be placed on the importance of private gardens.

The connectivity section should contain reference to the 367 bus which travels through Beckenham to Croydon.

The first bullet point under the section entitled 'Key Issues and Main Opportunities' should be amended to read: ‘How can we preserve the remaining Edwardian and Victorian buildings to the character of the area?’.

The final question on page 64 should be deleted.

**West Wickham and Coney Hall (page 66)** - Councillor Mrs Manning observed that Coney Hall had a greater link with Hayes than with West Wickham.

With reference to the key issues and main opportunities, the following comments were made:

- Changes permitted over the years had damaged the appearance of certain areas;
- The shopping centre was dying and was now an area of restaurants and cafes;
- Community facilities were good; and
- In respect of the potential of the former All Saints/John Rigby school site, it was important to maintain the character of the school.

Councillor Fawthrop alluded to the Coney Hall Estate which was originally intended as a starter home scheme. At times of economic pressure, owners had been unable to move up the housing ladder and had opted to remain where they were by extending and modifying their homes instead which made them no longer fit for use as starter homes.
It was suggested that the word 'deprived' be replaced with alternate wording throughout the document.

Appendix 3 - Bromley's Strategic Issues
Councillor Mellor referred to the lack of surgeries and availability of GPs within Copers Cope Ward, which meant that residents in the north of the Ward had a fair distance to travel for appointments. Councillor Mellor requested that Members of Planning Committees look favourably upon planning applications relating to change of use to surgeries.

RESOLVED that:-
1) the structure and approach to preparing the Core Strategy Issues Document as set out in the report be agreed;
2) with reference to the objectives, area pen portraits and strategic themes forming Appendices 1-3, that the comments and suggested amendments referred to above be considered by the Local Development Advisory Panel on 24 March 2011 (meeting subsequently moved to 4 May 2011 and may be subject to further change); and
3) the remaining area pen portraits be considered at the next meeting of Development Control Committee on 19 April.

Appendix 1b

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 19 April 2011

CORE STRATEGY - FURTHER EIGHT AREA PEN PORTRAITS
In January 2011, the Local Development Framework Advisory Panel (LDFAP) endorsed the approach taken on the development of a Core Strategy Issues Document. The LDFAP also requested that Development Control Committee consider the developing Bromley Borough area pen portraits and overall structure and approach of the document, which would be issued for consultation purposes in preparation for the development of Bromley’s Core Strategy. The Core Strategy would form the principal policy within the suite of documents constituting the Local Development Framework (LDF).

On 8 March 2011, Members considered 13 of the 21 area pen portraits (Minute 88). A further three area pen portraits were e-mailed separately to Members but were not considered at that meeting.
Members were now asked to consider the final five area pen portraits together with the three previously circulated at the meeting held on 8 March. Members’ views and suggested amendments are set out below.
Biggin Hill (page 45) - No comments/amendments received.
Bromley Town (page 49) - The words “to London” should be deleted from the first line of the second paragraph.

Councillor Mrs Manning would send comments/amendments direct to the contact officer.
It was noted that the use of an apostrophe in reference to ‘GP’s/doctor’s [sic] surgeries’ should be removed throughout the entire document.

Chelsfield, Green Street Green and Pratts Bottom (page 55) - With reference to Green Belt land, Ward Member Councillor Jackson commented that it would be helpful to allude to Glentrammon Recreation Ground and „The Green” at Green Street Green.

Under the heading „Key Issues and Main Opportunities“, it should be reported that Green Street Green was in close proximity to Orpington Town Centre. The importance of the viability of village life should be emphasised. With regard to demography and community, Councillor Jackson disputed that the majority of housing consisted of family homes; there was no shortage of smaller accommodation for elderly residents and single people.

The impact on commuting and parking in and around the area should be noted.

It was agreed that the land at Fort Halstead (referred to in paragraph 5, page 61) should be alluded to but would not be referred to as a point of consultation.

Darwin and Green Belt Settlements (page 59) - Councillor Mrs Manning would send comments/amendments direct to the contact officer.

It was noted that Wickham Court (referred to in paragraph 2, page 59) and the former All Saints (John Rigby) Secondary School (referred to in paragraph 1, page 61) were both situated within Coney Hall, not in Darwin.

Eastern Green Belt (page 64) - Councillor Ince emphasised the need for strong legal action to be pursued against anyone who destroyed woodlands within the area.

It was also noted that certain parts of the area were populated by the Traveller community.

Orpington, Ramsden and Goddington (page 68) - Ward Member Councillor Huntington-Thresher requested that the title of the area pen portrait be changed to read:- "Orpington, Goddington and Knoll" as Ramsden Estate was slowly becoming non-existent and could no longer be deemed as an entity in its own right.

The reference to "playing fields" on page 68 should incorporate Grassmeade Recreation Ground and the protected area between Burwood School and Blenheim Primary School.

Under ‘Demography & Community’, the report stated that income in the area tended to be lower than the Borough average, whereas in the following paragraph under ‘Business and Employment’ it stated that the area had an average household income that was close to that of the Borough average. Councillor Huntington-Thresher requested that the inconsistency of the two statements be addressed. In addition, Councillor Huntington-Thresher suggested that rather than reporting averages, a truer reflection of areas could be gained by reporting the dichotomy of areas.
Ward Member Councillor Buttinger supported Councillor Huntington-Thresher's comments. Councillor Buttinger commented that two conservation areas had been omitted from the area pen portrait and emphasised the importance of protecting conservation areas and maintaining the openness of the land.

The impact on residents regarding parking issues around commuting and the town centre should be addressed.

Shops should be encouraged to provide services required by residents.

Petts Wood and Poverest (page 73) - Ward Member Councillor Auld, observed that the area of Poverest had not been referred to throughout the report, even though it formed part of the pen portrait title.

Councillor Auld reported the following: -
- The difference between ward boundaries and constituency boundaries was somewhat confusing.
- In garden suburbs there should be a presumption against back garden development.
- The reference to River Ravensbourne flowing through the area (page 73, final paragraph) was inaccurate. The sentence should be amended to read "The Kyd Brook flows through the area and although it is mostly culverted, there is some flood risk."
- Willett Recreation Ground should be highlighted, together with the sports facilities available ie. tennis and cricket.
- Under the heading 'Business and Employment', there are two areas of business, namely Station Square and Queensway. The number of eating establishments, both eat-in and take-away, should be reported.
- Facts pertaining to rail travel should be updated.
- Issues around commuter parking should be addressed.
- It was the desire of Petts Wood residents and all three Ward Members that the issue of side space be strictly monitored to ensure it is kept to a minimum of 1 metre generally, with a wider side space achieved, where appropriate, in conservation areas and areas of special residential character.
- The number of licensed premises should be limited to the number of existing premises.

Councillor Fawthrop suggested that the title of the area pen portrait should be changed to "Petts Wood and Surrounds".

Councillor Bosshard reported that there were three supermarkets and more than three GP surgeries in the area.

Referring to the final paragraph on page 74, Councillor Evans reported that there were six other schools and questioned the need to highlight that extra provision could be made available at Southborough School.

Paragraph 5 on page 74 stated that the Turpington Estate was situated on the western boundary. Turpington Estate is, in fact, situated squarely within Bromley Common.
The Coppice Estate should be highlighted as a working class area built during the inter war period and located on the western boundary.

Ravensbourne, Plaistow and Sundridge (page 77) - Ward Member Councillor Harmer commented that Plaistow and Sundridge consisted mainly of Edwardian and Victorian buildings. There was a mix of large and small family accommodation within the area, and that if the decision was taken to demolish the buildings and replace them with flats, it would change the area considerably.

The existence of a golf course should be highlighted. Large developments of housing on the golf course would cause significant traffic issues. There were transport problems at Bromley North. In particular, taxi drivers were being pushed into residential roads.

It was noted that Holy Trinity School had stood vacant since 2005. Several facilities including a library, a school and the Downham Boys Club were shared with the Borough of Lewisham.

Councillor Adams agreed with Councillor Huntington-Thresher's suggestion that the dichotomy of areas should be reported rather than the Bromley average.

As a final comment, Councillor Adams also referred to the section titled 'Social Infrastructure' on page 79. The final sentence did not make sense and should be amended to read: "During recent years, residential development has replaced two community hall sites and a scout hut in the area of Shaftesbury Park on the Downham Estate."

RESOLVED that the comments and suggested amendments referred to above be noted.

Appendix 1c

Responses to the Core Strategy (Vision and objectives and Strategic / Spatial Themes) as reported to

DEVELOPMENT CONTROL COMMITTEE
7.30 pm on 17 November 2011

Vision and Objectives

Vision
Whilst some commented that the objectives are clear and focussed others felt that the objectives do not focus on the key issues residents are concerned about, are contradictory and should be SMART (Specific, Measurable, Achievable, Realistic and Timed), reflecting areas of priority, including a realistic timeframe in relation to resources available. It was suggested that the Vision statement should show more clearly how it is hoped Bromley will develop over the course of the Core Strategy.
period. The Vision eg., „There are 45 conservation areas and a wide range of historic and listed buildings” reflects today (Environment Agency) rather than considering future changes in the role of town centres in the future, traffic and infrastructure changes and population growth. The Core Strategy should identify what has stopped us achieving the Vision today.

The loose boundary pen portraits are supported and it is suggested that the vision should be expanded to set out how the area and the places within it should develop, building on the pen portraits which set the scene. It was suggested that the Vision should relate closely to the Council's Community Strategy and develop the CS themes further, particularly regarding the quality of the environment and new housing.

The contribution of future development to achieving the Vision that “people enjoy a good quality of life in all Bromley's places” was highlighted.

Some comments noted that it is important to appreciate and acknowledge Bromley's position as London's greenest borough and the extent of Green Belt. However, others considered the Vision environmentally biased, noting that whilst environmental considerations are obviously important, most residents put education, health, prosperity, opportunity, mobility and transport above the environment.

It was noted that there are major disparities between the income and health factors across the Borough and that these disparities should be reflected somewhere within the overall Vision statement.

It should be acknowledged that The London Plan 2011, the National Planning Policy Framework and future guidance documents together with reference to working with adjacent boroughs all affect the outcomes of this document. Attention is drawn, to London Plan references to borough responsibilities, in respect of social infrastructure and suggest that London Plan terminology is used.

Objectives
1. Open and Natural Space
Suggested responses included:-
Whilst there is a need to protect open spaces, natural environments and trees, there is also increasing pressure on the Green Belt to provide for the growing needs of the community. Appropriate development, which preserves the openness and appearance of the Green Belt should therefore be allowed.
Small release of Green Belt for housing would be preferable to compromising the character and quality of life of residential areas that are already “full”.
Changes should be made to the Green Belt boundary for land not serving the 5 purposes of Green Belt set out in PPG2. This would also be in line with the draft NPPF which includes references to the presumption in favour of sustainable development, and the need to support economic growth through the planning system.
extending the allowance for previously developed land within Green Belt to come forward for development, which is allocated for redevelopment to similar sites not already allocated or designated for development in a local plan.
Also, when reviewing Green Belt boundaries through Local Plans
have regard to the long term so that the boundaries endure beyond the plan. 
take account of the need to promote sustainable patterns of development. 
Suggested additional Objective:
“To review the Green Belt Boundary to ensure that any sites, which do not meet the 5 criteria set out in PPG 2, are removed from the designation”. 
Improving access to the Green Belt by the neighbouring urban populations should be a priority. 
This objective is broadly supported by Natural England with this suggested rewording “Encourage protection, enhancement and creation of biodiversity”
This objective is supported by the Environment Agency who suggest reference to delivering the Water Framework Directive though this objective link with the blue ribbon policy in the London Plan. 
incorporating actions from the local biodiversity action plan.
combining elements with Objective 7 (Climate Change and Environmental Issues) revise objectives to refer to protection of land, soil, surface and ground waters and air, and the protection and enhancement of fish stocks. Managing for the benefit of wildlife and people. 
Add new objectives: 
Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change. 
Improve the quality of surface and ground water, rivers and wetlands for the benefit of people, the economy and wildlife. 
All sections of society to have opportunities to enjoy water and wetlands through sport and other recreations.

2. Health and Wellbeing 
Objective to provide a healthier environment welcomed as is the support for all communities to improve their own environments. The Healthy Urban Development Unit suggests that the objective concerned with tackling deprivation should reference “health inequalities”. 
The role of biodiversity and the natural environment in respect of health, recreation, climate change adaptation and quality of life should be made more explicit in the Core Strategy and policies included to ensure the Borough”s green infrastructure is designed to deliver these multiple functions. (Natural England) 
The Environment Agency support the objectives and suggest an additional objective: Healthier local environments should be encouraged and managed to enhance people’s lives and support a sustainable economy.
A specific objective regarding planning for the ageing population in respect of housing and other support mechanisms, in particular a pro-active stance towards Owner Occupied Retirement Housing.

3. Housing 
Support for the objectives which facilitate an increased supply of new homes. 
Comment that the continuation of existing policies would not be a sound approach since they would not deliver the necessary quantum of growth. 
Raise the quality of existing flats particularly poorly maintained conversions which adversely affect the character. 
Too many old properties are readily demolished in favour of new build flats and executive homes, with little regard for infrastructure - local schools, surgeries. 
It is suggested that the objective be titled “Homes” rather than “Housing”
The objective should provide an appropriate supply of housing suitable to a range of differing incomes.
Bromley should sign up to the London Accessible Housing Register (LAHR)
In many places there are few, if any opportunities for future housing development, however the pen portraits could at least highlight any that are likely to come up, even where development would be contrary to other objectives.
The Environment Agency support objectives and suggest revisions to include:
New and existing developments should have a reduced environmental impact and well-planned environmental infrastructure
The issues of contaminated land must be addressed safely before development begins
Measures to mitigate and adapt to climate change and flood risk shall be incorporated into new developments.

4. Community Facilities
Support for the objectives which support new community facilities that are accessibly located and it is essential that the Core Strategy seeks to protect the net loss of such facilities (Metropolitan Police Authority / Service, Bromley College of Further and Higher Education and others).
South London Healthcare NHS Trust support the retention of facilities whilst noting that change may be required to modernise the provision of services, involving intensification, relocation or reprovision of traditional community facilities in more suitable locations.
Supporting text should highlight “places of worship”

5. Business and Employment
Support for the encouragement of business and employment through investment and development in the local economy.
The objective to ensure that there is an adequate supply of commercial land in the Borough by ensuring that appropriate sites are available for redevelopment is supported, with particular reference to land adjacent to Crayfields Business Park.
An increase in local employment opportunities is supported and identified business areas should be encouraged to adapt to the changing needs of modern industry and commerce.
Acorus (for Scotia Gas Networks) comment that there should be reference to the “qualitative value” of business and employment land & buildings. Only the best employment land should be retained and protected with a review of sites no longer “fit for purpose”. Changes reflecting the flux in the current and potential uses are suggested to the 3rd & 4th bulleted objectives to ensure an Appropriate range of suitable, available and developable land and premises… Adequate supply of high quality available, developable and suitable commercial land…
The most efficient and effective use should be made of land, prioritising previously developed land, noting that job creation can come from a range of Economic Development uses including retail.
Capital Shopping Centres support the enhancement of Bromley”s position as a Metropolitan Town and they, and others welcome the encouragement of a prosperous evening economy, which it is suggested, should build on existing strength.
Suggestion that banks be allowed in prime town centre locations to meet the objective of encouraging investment and developing the local economy (UDP Shopping frontage policies and parts of the Bromley TCAAP out of date). The Environment Agency support objectives and suggest revisions to include: Businesses and other organisations know what the best environmental options are for using resources wisely. Businesses and other organisations reduce the impacts of their activities on water, land and air and are responsible operators.

6. Town Centres
The approach of ensuring the continued vitality of Bromley Town Centre, particularly through the implementation of the AAP is supported by an Opportunity Site landowner who suggests that it should be made clear in the Core Strategy that the council will work pro-actively with landowners to enable delivery. Retail should be diverse and include a mix of local and chain offerings i.e. not just fashion and clothing shops from the usual brands. Include commitment to build and retain markets like the Thursday market in Bromley Town or the Friday and Saturday offerings in the High Street. The Council needs to look closer at areas for regeneration, e.g. shop closures in Petts Wood. Town Centres should be safe and welcoming all day or night. The behaviour of youths during the evenings and weekend will deter people from visiting the town centre. All existing retail sites should seek to fulfil their potential, including through expansion or redevelopment. Sustainable design and construction can add value to the local economy. Enable banks in prime town centre locations to "ensure continued vitality of Bromley Town Centre" (require BTCAAP changes).

7. Environmental Issues
Reference to Green Infrastructure in this section is welcomed but should be incorporated into the objectives since they can significantly contribute to climate change adaptation. The Environment Agency support objectives and suggest revisions to the text to include wildlife and biodiversity and suggests the inclusion of water efficiency of new developments in the criteria for energy and resource saving in the final document. They also suggest combining elements with Objective section1 (Open and Natural Space) and additional objectives to include: Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change. Flood risk from all sources is effectively managed and people and property are better prepared and protected. Land is used sustainably to meet the needs of the public, business and the environment. Ensuring the right waste and resource management infrastructure is in place. Air quality is protected and improved. Businesses and other organisations and the public know what the best environmental options are for managing waste and using resources wisely. Safe, secure water supplies are used efficiently to meet the needs of the public, business and the environment.
People and wildlife are helped to adapt to climate change and reduce its adverse impacts.
Surrey County Council welcome the objective to increase self-sufficiency in dealing with waste, and stress that this should relate to all three major waste streams - municipal waste (MSW), commercial and industrial (C&I) waste and construction and demolition (C&D) waste.

8. Design and the Public Realm
Support for the objectives to improve the provision of open space in new development, ensuring accessible and safe streets.
Natural England welcomes the reference to appropriate private and public open space, and encourages the council to include the provision of "soft" landscaping.
The Environment Agency support objectives and suggest inclusion of the following objectives:
Ensure a presumption against harm arising from any development
Ensure that there will be no net loss, and there should be clear benefits, arising from any development.
Ensure the improvement of rivers and their corridors
Ensure that land is managed sustainably to protect and improve water, land and air and contributing positively to reducing and adapting to climate change
New and existing development should have a reduced environmental impact and well planned environmental infrastructure
Development must achieve the highest design standards and which, at a minimum, is good enough to approve and will be a distinctive and valued addition to the area.
Use construction and design techniques that encourage sustainable forms of development and favour the retention of existing buildings with their historic associations and the energy already expended and embodied in their construction.
Ensure that the location is the most sustainable for development, taking the Water Framework Directive and environmental enhancement into account.
Flood risk is managed effectively and people and property are better protected
Ensure the consideration of flood risk in design and construction of development demonstrated through a flood risk assessment where required.

9. Built Heritage
Bromley does not do enough to promote its heritage and 'spread the word'.
Text should refer to heritage assets on the at risk register, rather than "historic features" and an additional objective added
"To address historic character and the wider historic environment through appropriate new development".

10. Transport
Safe accessible uncluttered streets objective is welcomed. The problem for people with disabilities relating to shared space and street furniture was highlighted.
The objective to encourage the use of public transport must be supported by improvements to the transport infrastructure.
If cars are being discouraged and the rail system is at capacity, unless a viable alternative is found building more homes in Bromley should not be allowed.
Should include improved rail/tram/DLR links, specifically rapid transport connections North and to the West i.e.
Bromley North direct trains to Charing Cross and Cannon street.
Extension of tram from Beckenham into Bromley Town and beyond, and / or Extend DLR from Lewisham into Bromley.

Should include development of cycle lanes. Sustainable transport should be encouraged throughout the Borough, through redevelopment opportunities which enhance public transport facilities, improve access and facilitate linked trips through to mixed-use developments.

The Environment Agency support objectives and suggest inclusion of the following objectives:

Major development and or facilities should only be planned where they can maximise the use of existing public transport or secure new public transport facilities to and from major housing, employment, health, education and shopping.

Ensure improved accessibility to the public transport network by promoting bus and highway development and enhancing the frequency of public transport, wherever appropriate.

Support improvement to the quality of the network by the enhancement of facilities, infrastructure and user information.

Seek developer and other contributions to the provision of and improvement to the public transport system.

Suggested Additional Groups of Objectives

'Lifetime Neighbourhoods'

The GLA suggest an additional objective regarding meeting 'Lifetime Neighbourhoods' principles as this may provide an overarching objective for many of the neighbourhoods' issues set out in each of the area profiles with the Core Strategy setting out how the different neighbourhoods will contribute to achieving the principles of Lifetime Neighbourhoods.

"Working with local people, businesses and partner organisations".

The Environment Agency comment that it is critical to the delivery of the strategy that actions and partners involved in delivering the Core Strategy can and should be identified, including local people, neighbouring councils, GLA, DCLG, authorities with environmental responsibility (the Environment Agency, Natural England and English Heritage) infrastructure and service providers, professional and trade associations and major interest groups. They suggest an additional group of objectives headed "Working with local people, businesses and partner organisations". With the following objectives:

Ensure all sections of society have opportunities to influence and know how to engage with Council in order to create better places and communities.

Ensure that staff have the necessary skills to work with all sections of society to develop shared solutions to identified problems and to deliver the Core Strategy.

"Accessible Bromley for all Disabled People".

Disability Voice would like a clear commitment within the strategy for an accessible Bromley for all disabled people, constituting a strategic/ spatial theme in its own right, including written commitments to:

engage a Council Access Officer to champion the access needs of Deaf, disabled and older people

a strategic approach to ensure continuity of access between future developments, so deaf, disabled and older people will be able to travel door to door safely and make full use of available facilities
not only meet mandatory access requirements, but all developments to be constructed to BS800 (and future incarnations) and beyond as standard practice. require all developers to have to employ an Access Consultant

Minutes of the meeting held at 7.30 pm on 17 November 2011

Re CORE STRATEGY ISSUES DOCUMENT - CONSULTATION RESPONSE

Consultation had been undertaken between July and the beginning of October 2011 on a Core Strategy Issue Document. The timescale and changing context for the preparation of the Core Strategy was set out in Appendix 2 of the report.

The Chairman gave a brief summary of the report and drew Members' attention to paragraph 3.3 which identified ways in which the consultation process had been carried out. Attention was also drawn to paragraph 3.5 which outlined the key issues needed to be taken into consideration during the next stage of the consultation process.

Referring to page 74 - paragraph 3.5, first line of the second bullet point (Areas of Special Residential Character), Councillor Russell Jackson asked that the words 'Chelsfield Residents Association' be amended to read 'Chelsfield Park Residents Association'. Councillor Jackson looked forward to the consideration of that matter.

In relation to English Heritage and the historical character of the area, Councillor Mrs Manning emphasised the importance of ensuring that this was highlighted as a key issue.

Councillor Michael commented on the need to retain areas specifically for new businesses and industrial use. Referring to the subject of town centres (page 81), Councillor Michael stated that town centres should be safe and welcoming at all times of the day or night and suggested that the borough needed to provide family-friendly venues and that the Council should use its licensing controls with regard to the sale of alcohol etc.

Councillor Jackson commented on the viability of village life as a distinct element of Bromley and asked that this be reflected somewhere within the document. Councillor Ince stated that urban open space should be included in the first category of paragraph 3.5 (Green Belt and other protected open space).

Councillor Fawthrop requested that Petts Wood be included as an area of special residential character in terms of its housing.

The Chairman informed Members that a further report would be submitted to the Local Development Framework Advisory Panel in March 2012. The Chief Planner advised that the report would reflect all the comments made by Members and would explain the reasons why some would not be pursued.
RESOLVED that:-
1) Member comments be reflected in a further report to be submitted to the Local Development Framework Advisory Panel in March 2012; and
2) the timescale and changing context for the preparation of the Core Strategy as set out in Appendix 2 of the report be noted.

Appendix 1d

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 28 June 2012

LIVING IN BROMLEY - HOUSING OPTIONS
In May 2012, the Local Development Plan Advisory Panel (LDPAP) agreed that work undertaken in preparation of the Core Strategy be incorporated into a Bromley Local Plan to comply with the Government’s Planning Reforms. The report outlined the preferred strategy and options in relation to housing which would form the major part of the Living in Bromley section of the Local Plan. Members were requested to agree the policy approach set out in the report for incorporation into the Local Plan Options and Preferred Strategy Consultation document. The Executive would be requested to agree the document for consultation in early autumn.

The Chairman gave a brief outline of the report and stated that residents had been involved in the consultation process as suggested by the LDPAP.

Referring to Option 4A.3, Councillor Fawthrop raised concerns in relation to housing targets as developers were increasingly reporting that they could not viably include affordable housing in their schemes. Councillor Fawthrop suggested that a clause be inserted to ensure that economic conditions were taken into consideration. He also suggested that the words 'right to buy' and 'shared ownership' be incorporated into the option. Councillor Jackson requested that a percentage of the 35% target be allocated to shared ownership and that where Housing Association developments were proposed, that a right to buy scheme was incorporated. The Chairman responded that the issue of 'right to buy' could be dealt with individually at the time of application.

The Chairman referred to Option 4A.4 which stated that if more than 10 units were proposed, then the developer would be under an obligation to supply affordable housing. In response, the Chief Planner informed Members that the London Plan needed a percentage or numerical target and option 4A.3 was preferred because the 35% target was what the Council achieved via the UDP period. People disposing of and acquiring land should be aware of the constraints and whether a viability assessment had been undertaken. The target of 35% worked effectively. Large sites consisting of more than 10 units would be subject to a viability assessment. Councillor Mellor commented on the importance of meeting targets and preferred to see a target of 470 units over the plan period. However, he did emphasise the need for the Council to remain mindful of the need to protect Green Belt land.
In response to a comment from Councillor Owen in relation to inappropriate development on residential gardens, the Chief Planner informed Members that Option 2A.4 recognised that development of residential gardens was not acceptable where it would cause harm to the residential area and prevented developers from using garden land for development.

Referring to paragraph 3.6.3, Councillor Ince noted there were no targets for intermediate/shared ownership. The Chief Planner clarified that under the existing plan, the percentage split was 70/30 between social housing and other types of affordable accommodation and emphasised the importance of selecting the most suitable type of housing for individual sites.

Councillor Joel welcomed the provision of housing designed for wheelchair accessibility and commented that he would like to see a percentage target set for the provision of a mix of housing supply for disabled, elderly and young people.

Subject to the comments and suggestions above, Members RESOLVED that the policy options be incorporated into the Local Plan Options and Preferred Strategy Consultation document.

OPTIONS PAPER FOR GYPSIES & TRAVELLERS AND TRAVELLING SHOWPEOPLE

In May 2012, the Local Development Plan Advisory Panel (LDPAP) agreed that work undertaken in preparation of the Core Strategy be incorporated into a Bromley Local Plan to comply with the Government’s Planning Reforms. The report outlined the preferred strategy and options in relation to Gypsies and Travellers, which would form the major part of the Living in Bromley section of the Local Plan. Members were requested to agree the policy approach set out in the report for incorporation into the Local Plan Options and Preferred Strategy Consultation document. The Executive would be requested to agree the document for consultation in early autumn.

Referring to paragraph 3.19 (page 55), Councillor Mellor sought clarification on what liability was placed on the Council to provide a pitch to people living outside the Borough. In response, the Chief Planner informed Members there was no liability on the Council and that anyone could ask for a pitch in Bromley however, they would need to pass a test in order to obtain one.

Councillor Scoates referred to Option 2: Existing sites without permanent permissions (page 59) and stated that it was not acceptable to grant further temporary permission for the site in Layhams Road and that the site should not be expanded. The Chief Planner reported that if families were established and their children were settled in school, it would be difficult to refuse further temporary permission. He also stipulated that age, disability and education were crucial factors in traveller appeals. The only other alternative would be to find a number of sites elsewhere in the Borough. Councillor Scoates was disappointed with the current policies which stipulated that the Council was required to grant plots to meet a specified quota and by doing so, land had been eroded. Councillor Ince stated that further alterations to Green Belt land should be resisted; however, the Council were under challenge to create more spaces and were expanding anyway.
Councillor Fawthrop was concerned with the large number of articulated lorries at the Travelling Showman site and suggested that some action be initiated to revert the site to farmland. The Chief Planner confirmed that he was satisfied that all residents were part of the Travelling Showpeople’s Guild. No further provision was planned for the site which had been granted permanent permission.

Councillor Buttinger refused to support any option which involved building on Green Belt land. In response, the Chief Planner emphasised the need to take account of expanding families. He stipulated that the preferred option suggested that, having established what the borough’s target for provision should be, the Council would then have a policy to deal with sporadic visitors to the area.

It was suggested that the Chairman should write to local MPs to request that the issues raised by Members be considered in Parliament and nationally. A letter should also be written to the Secretary of State to reinforce the Council’s views.

Subject to the comments and suggestions outlined above, Members RESOLVED that:-
1) the options set out in the report and recommended by the Local Development Plan Advisory Panel be endorsed as 'Preferred Options' in the forthcoming Local Plan consultation document;
2) the Chairman write to local MPs to request that the issues raised above be considered in Parliament and nationally;
3) the Chairman also write a letter to the Secretary of State reinforcing the Council's views.

7c REVIEW OF GREEN BELT, METROPOLITAN OPEN LAND AND URBAN OPEN SPACE BOUNDARIES
In May 2012, the Local Development Plan Advisory Panel (LDPAP) agreed that work undertaken in preparation of the Core Strategy be incorporated into a Bromley Local Plan to comply with the Government’s Planning Reforms. Following LDPAPs review of the Green Belt, Metropolitan Open Land and Urban Open space boundaries, DCC Members were requested to agree that the suggested amendments made by the LDPAP be incorporated into the Local Plan Options and Preferred Strategy Consultation document. The Executive would be asked to agree the document for consultation in early autumn. Referring to indicator number 11 on page 74 of the report, Councillor Fawthrop requested that the car park for Jubilee Gardens and the scout hut adjacent to it (located in Tent Peg Lane), be incorporated.

Councillor Manning commented that it was logical to have boundaries for common land but questioned why the bulk of the land was designated as Green Belt land whilst that which stretched beyond the boundary was designated as urban open space. The Chief Planner confirmed that this was in keeping with the rules on Green Belt boundaries which stipulated that any land outside a defensible boundary would be classified as urban open space.

Councillor Buttinger was concerned that a significant amount of Green Belt land had been given up to development and suggested that a policy be put in place whereby if a development took away green space then it should be replaced.

Councillor Michael was pleased to note that smaller pieces of land had been redesignated. The Chief Planner reported that there was approximately
32 sq m of green land comprising various designations. Councillor Bosshard emphasised the need for the Council to continue to be robust in developing Green Belt boundaries. **Subject to the comments and suggested amendments outlined above,** Members RESOLVED that the suggested amendments to the Green Belt, Metropolitan Open Land and Urban Open Space boundaries be endorsed and included in the forthcoming Local Plan consultation document.

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**DEVELOPMENT CONTROL COMMITTEE**

**Minutes of the meeting held at 7.30 pm on 26 July 2012**

**BROMLEY LOCAL PLAN**

In May 2012, the Local Development Plan Advisory Panel (LDPAP) agreed that work undertaken in preparation of the Core Strategy be incorporated into a Bromley Local Plan to comply with the Government’s Planning Reforms. At a Development Control Committee Meeting also held in May 2012, Members considered and agreed the preferred strategy and options in relation to housing, gypsies and travellers and the Green Belt which would form the major part of the Living in Bromley section of the Local Plan. Members were now requested to agree the preferred strategy and options with regard to the remaining main theme areas of the Local Plan. In early September, the draft Options and Preferred Strategy document would be reported to the Executive and approval would be sought for a six-week public consultation period.

Each option was considered as follows:-

Appendix A – Living in Bromley
Options 1a-1b – Councillor Ince was unsure of the suggested preferred option as areas within his Ward (Cray Valley West) would require regeneration rather than renewal. The Head of Planning Strategy and Projects responded that Option 1 was preferred as it encompassed a broader range of areas.

Appendix B – Supporting Communities
“Bromley 2030 Vision”, third line: - The word ‘choice’ should be replaced with a suitable alternative.

Option 4 – One Member queried whether the recently acquired cemetery at Sidcup By Pass would create sufficient capacity without the need to seek further sites. It was reported that advice given by officers was that further sites would be required over the lifetime of the plan.

Paragraph headed ‘Options for Education’ (page 16) – as the initial paragraph did not include reference to selective schools, the words ‘Academies and Free Schools’ should be deleted.

Options 5-5b – With regard to Option 5b, the Chief Planner reported that the Local Authority would not be able to decide which educational establishments took on certain sites.
Paragraph headed ‘Development Management Policies’ (page 17) – With regard to specific protections for facilities important to local communities, Councillor Michael suggested that libraries be added to the list. It was also reported that at a meeting of the Local Development Framework Advisory Panel, Members had requested that the heading ‘Development Management Policies’ be changed to ‘Development Control Policies’.

Appendix C – Getting Around – Working Draft
Policy Options – Visions
- Amend first sentence to read: ‘Moving around the borough is easier due to reduced road congestion and improved public and private transport networks.’.
- 5th line, amend sentence to read along the lines of: ‘Any new development might where appropriate, include electric vehicle charging points and there are more car clubs, increasing choices for local people.’.
2nd paragraph, page 20 – Discussion about uncluttered streets took place. Officers should ensure that every option throughout Appendix C was marked as either ‘preferred’ or ‘not preferred’.

Option 4 – Amend first sentence to read: ‘To promote the safe use of cycling, walking, public and private transport to improve access to services for all. One Member suggested that the Mayor should consider car parking with the use of Oyster Cards.
Option 10a-10d – One Member preferred option 10d as no funds were available to carry out DLR extensions. The Chief Planner reported that Option 10d was not the preferred option of LDAFP Members. Two possible further options were raised.

Appendix D – Bromley’s Valued environments – Working Draft No comments.

Appendix E – Working in Bromley – Working Draft
Option 1A – The Chief Planner would check and confirm to Members the precise location of Footscray Business Area.

Option 1A.1 – The Chief Planner explained the background to the High Court challenge with regard to Site A and informed Members that the Local Authority had been instructed to do what was set out in option 1A.1.

Options 3A.1-3A.3 – In option 3A.2, ‘designated’ should be replaced by ‘review’ or ‘recognise’ as Members were concerned that the word ‘designated’ could be open to interpretation. Councillor Papworth suggested that Option 3A.2 should not be the preferred option at all.

Appendix F – Environmental Challenges – Working Draft
Options 1A-1B – Councillor Fawthrop commented that people who worked from home contributed substantially to the reduction in carbon emissions and suggested that reference could be made to the provision of adequate access to the internet was made available to all homes.
RESOLVED subject to the comments and amendments suggested above that:
1) the policy options as set out in the paper and appendices be incorporated in
the Local Plan Options and Preferred Strategy Consultation document; and
2) the basis of the consultation process for the Options and Preferred Strategy
stage of the Bromley Local Plan be agreed.

Appendix 1f

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 29 January 2013

OPTIONS AND PREFERRED STRATEGY CONSULTATION DRAFT LOCAL
PLAN
Consideration was given to the consultative Options and Preferred Strategy
document which formed a key stage in the preparation of Bromley's Local Plan.
Member comments would be reported to a meeting of the Executive on 6 February
2013 at which time the document would be considered for approval for public
consultation.

Members scrutinized the document and conveyed the following comments with
suggested amendments (in italics):

Homes (page 22, first two lines) - Amend to read: '...density of development, spatial
standards, parking requirements and improving the choice of accommodation
available.'

Homes (page 22, second objective) - Include reference to domestic housing
extensions as these formed a vital element of planning within the Borough.

Business, employment and the local economy (page 22) - This section should
include reference to the use of digital communication and highlight the importance
of the digital economy for the future of the Borough.

Built Heritage (page 23) - Reference should be made to the continual monitoring of
built heritage.

Transport (page 24) - Include reference to the development of car parks around train
stations in the Borough. The Head of Planning Strategy and Projects agreed to
report back to Members following discussions on this point with Highways Division
and the Environmental Health Officer.

Transport (page 24) - The development of dedicated cycle routes/lanes should be
incorporated into the objectives.

Location (page 31, paragraph 4) - Include reference to protect Metropolitan Open
Land.

As a general point, it was noted that the document contained the words
'Development Management' throughout. Members requested that these be replaced
with the words 'Development Control' as agreed at a meeting of the Local
Development Framework Advisory Panel held in December 2012.
Option 6 (page 32, paragraph 2, line 7) - A request to delete reference to 'back gardens' was rejected as this line quoted London Plan Policies. The proposed Bromley approach included the importance of all residential gardens.

Option 9 (page 33) - Amend to read: 'The design of all new housing developments should be of a high standard and layout and enhance the quality of local places whilst respecting local character, spatial standards, context and density.

Option 17 (page 37, paragraph 3) - There were concerns that the wording for this paragraph, including reference to '10% of 1-9 houses' in numerical terms did not make sense. Officers were requested to re-word the paragraph.

Option 19 (page 38) - delete the words 'a mix of'.

Option 30 (maps) - Members requested that the maps be amended to clarify locations within the Borough and for the descriptions to be revised accordingly.

Option 32(ii), (page 53, second bullet point) - Incorporate reference to the possible impact on Green Belt land.

Supporting Communities (page 57, final line) - amend to read: '..over 60 years of age recorded in 2011 than in 2001, almost half of the total. '...

Option 35 (page 58) - amend to read: 'To support the quality of life in all Bromley's neighbourhoods through the appropriate provision and retention of a range of social infrastructure such as health and education provision,........'

Option 40 (page 63) - It was reported that this option included the protection of school playing fields from being sold off. The Head of Planning Strategy and Projects stated that it possibly included the protection of education sites in instances where a school had closed down however, she would check this point and report back to Members. It was suggested that the words 'ensuring proposals are sympathetic to Green Belt land' be inserted into the Option.

Option 41 (page 63) - Replace the word 'positively' with 'appropriately'.

Option 46 (page 67) - Amend to read: '.........securing enhancement where appropriate opportunities arise whilst maintaining the openness of Green Belt land'. The Acting Chief Planner explained that Green Belt policy applied to proposals anyway so it would not be necessary to reiterate that point.

Option 51 (page 69) - Amend to read: 'To explore the opportunities for Burial Sites.' Getting Around (page 71, 3rd bullet point of the second paragraph) - Amend to read: 'High car dependency and high mobility requirement amongst much of the population;' Page 80 - It was suggested that an additional option 57a be inserted relating to congestion problems within the Borough to read something along the lines of: 'Support additional car parking facilities at transport interchanges ie. train stations'. It was also suggested that parking facilities should accommodate the use of Oyster cards. The Head of Planning Strategy and Projects commented on the need to be mindful of a possible conflict with the Transport Strategy; she agreed to look into this matter further and report back to Members.
Option 66 (page 84) - There were concerns that the term ‘overground’ could be confused with the TfL brand ‘Overground’. Members therefore requested that the paragraph be amended to read ‘Heavy rail link - Improving heavy rail links between Bromley North and Lewisham.’

Open and Natural Space (page 87) - The definition of Green Belt land should be extended to include Metropolitan Open Land and urban open space.

Option 77 (page 90) - Amend to read: ’…protection of the Areas of Archaeological Importance and Sites of Special Scientific Interest.’

Option 98 (page 111) - Concerns were raised about managing the contraction of shops in high streets.

Option 100 (page 111) - Councillor Bennett J.P. was mindful that separate access should be provided at all times for residents living in accommodation situated above shops.

Option 108 (page 115) - Amend to read: ’Proposals for development and alterations to existing building should…….’

Subject to the comments and suggestions set out above, Members RESOLVED that Appendix B, as the draft Options and Preferred Strategy, be endorsed and referred to the Executive to agree to public consultation.

Appendix 1g

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 20 June 2013

REPORT ON LOCAL PLAN ‘OPTIONS AND PREFERRED STRATEGY’ CONSULTATION
When adopted, Bromley’s Local Plan would guide development in the Borough for the next 15-20 years and together with the London Plan, would form the development plan for the Borough.

Members considered a summary of the consultation undertaken for the Local Plan ‘Options and Preferred Strategy’ stage together with responses received and the next steps to be taken. Particular attention was given to the ‘soundness’ and ‘general conformity’ of the Local Plan with the National Planning Policy Framework and the London Plan.

The Chairman expressed his disappointment that the consultation had been responded to more by third parties whose responses related to areas of concern within their specific fields of expertise. Responses received from residents largely supported the Strategy.

The majority of residents did not agree with the GLA and a number of developers who called for a review on the release of Green Belt land. The Chairman urged the
Council to adhere to the current system of permitting the release of Green Belt land only in cases where exceptional circumstances for doing so were proven.

Residents considered that the current provision of gypsy and traveller sites within the Borough should be maintained. Councillor Fawthrop conveyed his displeasure that planning applications which had already received permission were not taken into consideration when housing targets were set by the GLA. He continued to say that house building had declined since targets were introduced and that Government and Socialist interference did not aid the situation.

Referring to the GLA’s view that the option for parking did not conform with the London Plan, Councillor Fawthrop believed it was the London Plan which did not conform with Government opinion. Whilst the Chairman considered that the option for minimum parking should be maintained, Councillor Fookes believed an increase in parking provision was required.

Councillor Michael was in favour of retaining the housing target of 470 units and advised the Council to inform the GLA that an increased target would have a significant impact on the character and openness of the Borough and that a distinction between inner and outer London should be made. Councillor Fookes suggested that 500 units would be a more realistic target. Councillor Michael also urged the Council to make it clear that Green Belt land characterised the openness of the Borough and barred against urban sprawl. The release of Green Belt land should not, therefore, be permitted.

Referring to the GLA’s comments (page 17, paragraph 3.4.7), that a higher density could be achieved in outer London locations in ‘sensitive ways’, Councillor Ince stated that areas of local character were, by their very nature, low density areas. He queried what the GLA meant by the word ‘sensitive’.

Commenting on the options for Gypsies and Travellers (page 29), Councillor Mrs Manning queried why the Showmens site in King Henry’s Drive was no longer used when there was a clear demand for sites. The Head of Planning and Strategy Projects believed the site was not specifically for gypsies and travellers but agreed to look into the matter further and report back to Councillor Mrs Manning.

Councillor Dykes was concerned with the loss of office space through change of use to living space. Referring to the economic recession and its impact on businesses over the past few years, Councillor Joel was confident that the current lack of office occupation would improve in time. Councillor Mellor was concerned at the desperate shortage of commercial land within the Borough and was vehemently opposed to the change of office use for the reason that office buildings were not suitable for conversion to residential accommodation. Councillor Ince stated that the local authority should retain its ability to decide whether or not permission for conversion should be granted.

Councillor Papworth referred to the soaring costs of house prices and the benefits captured by developers. He emphasised the need to establish a support system for younger residents who were currently required to save for
approximately 10-15 years in order to accumulate enough money for a deposit to buy a house with a mortgage costing 10 times their salaries. Councillor Fawthrop drew attention to the double standards of the current housing supply system where developers provided social housing consisting of confined living space with no gardens however they reaped all the benefits by providing private accommodation for people who could afford bigger and better things. Councillor Smith said that whilst there was a shortage of housing in some areas, there was actually an over-supply in others.

**RESOLVED that the preferred options be progressed to develop draft policies and site allocations, with key issues and areas of potential non-conformity with the London Plan brought back to the LDFAP and DCC for further discussion.**

Detailed Summaries of Representations to the ‘Options and Preferred Strategy’ Consultation considered at Development Control Committee (June 2013) and Executive

**1 Vision and Objectives**

**Open Space and the Natural Environment**

1.1 There was general support for the objectives relating to open space and the natural environment with most respondents in agreement. However, a number of respondents disagreed going on to make detailed comments regarding the Green Belt (GB). One respondent sought for the protection of the Green Belt to be more explicit while others raised the need for a robust evidence base/Green Belt review as required by the National Planning Policy Framework (NPPF).

1.2 Natural England commented that the first two objectives should be informed by an understanding of such matters as landscape character, designated and locally important habitats, and areas of green infrastructure that deliver ecosystem services. They suggest consideration of the use of an Accessible Natural Green Space (ANGS) approach to the fourth objective which combines benefits for human health and well-being as well as biodiversity.

1.3 A number of landowners or their agents, made comments regarding the need to review the Green Belt on the basis that there are some areas where land should actually be included in the urban area, and particular attention should be given to whether objectively assessed housing need is met. Reference was made to the use of strategic landscape and visual impact assessments in relation to any potential Green Belt release.

1.4 There were detailed comments regarding protecting residential amenity and resisting over development within built up areas, and also the importance of trees within the built up area. There were a few detailed comments regarding design and non-planning related comments.

**Health and Wellbeing**
1.5 There was general support for the Health and Wellbeing objectives, with responses focusing on particular issues that individuals or organisations felt should be given prominence in these objectives, or had been omitted. Many of which will be taken into account in more detailed development management policies.

1.6 A number of the comments made are covered by objectives and options in other sections, for instance, ensuring adequate open space for communities, addressing overcrowding in areas and dwellings, affordable housing to support economic growth, improving movement between areas, (e.g. by cycle routes and accessible paths), reference to new facilities being sustainable and meeting future needs and the important role of libraries and their maintenance.

7 The role of Renewal Area developments in supporting and enhancing health and wellbeing was highlighted, and a specific representation was made on behalf of Cray Wanderers, relating to the potential for a football led mixed development to improve health and well-being in the Crays. The GLA point out that there is no specific reference to meeting the Government’s ‘lifetime neighbourhoods’ principles; however, these run throughout the document and will be incorporated into policies. Babbacombe Road Residents’ Association raise concern about the lack of reference to reducing crime and anti-social behaviour. Other comments include the importance of the voluntary sector and a mix of age groups/generations within communities, communication with, and the involvement of local communities. A representation referred to the need to lobby parliament regarding preventing building on green space and also a number of non-planning matters.

Homes

1.8 Many of the comments made related more to the development of detailed policies against which to assess planning applications rather than the higher level objectives for the Local Plan. These will be taken into consideration as the policies are developed and include comments relating to parking issues, the needs of emergency vehicles, the mix of housing types, the management of the construction of houses, and regard to managing rain and surface rain run off caused by paving/non porous materials and the impact on flooding, with a view that the third objective regarding minimising environmental impact does not cover this adequately. Further comments were made to maintaining the side space requirement for residential extensions, protecting the Green Belt, ensuring garden space, and homes not too densely built, and rooms not too small.

1.9 The first objective for an ‘appropriate supply of housing was generally supported with no-one disagreeing although one respondent suggested the use of ‘adequate’ rather than ‘appropriate’ in the first objective.

1.10 Two comments refer to the need for the second objective to include ‘reflecting trends and requirements’ while respecting existing properties and character, and ‘embrace/accept change in terms of design, trends and technology’. Another point was that there should be more emphasis on design ‘enhancing’ and not merely ‘complementing’ existing character. Other comments made reference to modern construction and technology enabling positive changes to house building and the quality for occupiers. Again, policies relating to detail of design have still to be
developed as well as those under Environmental Challenge in relation to environmental impacts.

1.11 One business commentator made reference to the need for housing affordable for people moving into the area, and for businesses to attract employees.

1.12 Other comments included if someone owns a building they should be allowed to make changes unrestricted by planning, that developments which local residents do not like should not be built and the Council should be making it easier for the private sector to build houses with fewer requirements on them.

**Business, employment and the local economy**

1.13 There was broad support for the vision and objectives in this area. Respondents highlighted the importance of support to encourage manufacturing, hi-tech and creative businesses and high speed fibre connections.

1.14 It was suggested that the language could more closely align to the emphasis and wording in the NPPF in terms of the planning system "doing everything it can" to support sustainable economic growth.

1.15 The Biggin Hill SOLDC objective was welcomed, with the comment that the wording could more closely reflect the positive action-orientated wording of London Plan Policy 2.16, which is not simply to "enhance" the area's employment, but to "realise the potential".

1.16 It was also suggested to add at the end of the Biggin Hill Objective: 'and the wishes of the local community.'

**Town Centres**

1.17 There was general support for the vision and objectives with particular agreement for the diversity and range of uses within town centres. The importance of transport, access and parking was raised, as well as the importance of retail within the smaller town centres. A number of the specific points related to areas which policy development will consider, such as the change of use from retail to takeaways, cafes and restaurants, the possible consideration of park and ride, bringing empty shop units back into use in shopping parades Some points raised are outside planning, for instance the level of policing.

1.18 Detailed comments were raised in relation to Opportunity Areas in Bromley Town Centres, protecting heritage assets, strengthening the shopping offer in The Glades, leisure and recreational sites in and around town centres, protect current residential properties from overdevelopment and taking into account local circumstances (particularly Bromley and Beckenham).
Design and the Public Realm

1.19 The majority of respondents agreed with the objectives with two disagreeing; one of whom commented that reference in the introductory paragraph to car parking should not be a key consideration in this context. Natural England, in agreeing with the objectives, asked that the introductory paragraph refers to greening the urban environment and the value of including trees to soften the townscape and provide urban cooling.

1.20 Detailed comments regarding seating, and a balance in the ‘decluttering’ of streets, together with the comments regarding trees are for consideration as policies are developed.

Built Heritage

1.21 Eleven of the respondents agree with the objectives with several making specific comments. For example, Biggin Hill Airport Ltd raises concern that they may be too restrictive for the development solution which may be required at West Camp, that Petts Wood ASRC is facing saturation and concern with how ‘ensuring a proactive approach to the protection of and improvement of heritage assets’ will be achieved as the existing system is perceived as not working well in conservation areas. The respondent disagreeing with the objectives states the need to ‘ensure that ‘heritage assets’ do not get in the way of trying to build reliable and modern buildings that keep up with the needs of modern Bromley.

1.22 Other comments included that heritage assets should not have to contribute to strategic economic growth and, that it is important to promote this heritage to encourage future growth and innovation. Reference was also made to the importance of raising awareness of Bromley’s heritage through libraries and education.

Transport

1.23 General support was expressed for the five transport objectives, with several suggestions for expansion of one or more objectives. Babbacombe Residents’ Association suggested that the first objective goes on to say ‘and facilitate a greater proportion of journeys being made by public transport’ and the GLA suggests an additional objective should be to ‘facilitate efficient movement of freight whilst minimising its impact on the transport network’ and that the last objective could be expanded to recognise the differing roles of roads in the borough by taking a corridor approach. Network Rail suggest that the second objective should be amended to include ‘Support the renewal and enhancements to public transport infrastructure and links, including associated stations, parking and facilitate environments that encourage walking and cycling’. Tesco suggests encouraging improvement to the quality and management of parking in town centres.
**Environmental Challenges**

1.24 There is general support for these objectives with detailed comments regarding the need for measurable targets, for soil to be considered as an asset including the ‘best and most versatile agricultural land’, and the impact on views and landscapes and habitats to be considered in the development of local energy networks and low-carbon and renewable energy generation.

1.25 The one respondent disagreeing with the objectives queried whether the Council should be doing anything with regard to carbon levels whether building on flood plans and provide more facilities to recycle metals and electrical products.

1.26 Babbacombe Road Residents’ Association asked for the fourth bullet point to be amended by adding ‘i.e. by initiating central waste collection points within new developments thus directing residents to split waste appropriately and also encouraging residents to create less waste.’ And to add two further bullet points: ‘wherever possible seek to adapt unused properties to meet demand before considering new development’ and ‘Ensure, wherever possible, the recycling of rubble, soil and material waste from any new development’.

1.27 The GLA highlight an omission regarding Regionally Important Geological Sites (RIGS) and encourage the Council to expand its strategy to protect and enhance these sites in line with London Plan Policy 7.20 and London’s Foundation (2009) Supplementary Planning Guidance (SPG).

**THEMES**

**2 LIVING IN BROMLEY**

**Housing Supply (Preferred Option 1)**

2.1 Of the representations received in response to Question 10 (relating to the options for an annual housing target), four responses received from local residents agreed that Preferred Option 1 which is to seek to deliver a realistic annual housing target of 470 homes is the most appropriate approach. However, a larger number of responses were also received from agents and landowners who do not support the preferred option and have expressed concern that the target is not in accordance with the London Plan or the National Planning Policy Framework (NPPF). They request that the Council identify and release Green Belt sites for residential development in order to meet the current London Plan target and to meet housing need. They state that the Council has not had adequate regard to the NPPF which at Para 14 states that Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet the objectively assessed needs, with sufficient flexibility to adapt to rapid change. The robustness of the evidence behind the target has also been highlighted as an issue, in particular the London Borough of Bromley is not considered to have produced a robust SHMA that addresses the requirements of the NPPF to demonstrate housing need.

2.2 The GLA have expressed concern that there is a potential conformity issue with the Council’s preferred option which is below the London Plan target for LB Bromley of 500 units per annum. The GLA have stated that 2011 Census information found
that the population of London was 8.17 million indicating London’s population is
growing faster than forecast at the time of the development of the 2011 London Plan.
Consequently it is likely that the annual housing target for London of 32,210 units will
increase as need increases. The GLA state that the Councils ‘Options and Preferred
Strategy’ document relies on the 2009 sub-regional SHMA which is now out of date
and does not reflect the population growth referred to above. The GLA’s view is that
reducing Bromley’s annual target at this point in time would not reflect the fact that
London’s and Bromley’s overall housing need will be increasing.

Location (Preferred Options 4, 5, 6 and 7)

2.3 There are four preferred options for the location of new housing and 52
responses were received in respect of these options. These are the Town Centres
first approach (Preferred Option 4), Existing brownfield sites and windfall sites at a
density that respects local character (Preferred Option 5), Protection of residential
gardens (Preferred Option 6) and Renewal of Existing Residential Areas (Preferred
Option 7). In general the majority of representations received supported these
options as preferred options however there were also a few concerns raised as
noted below.

2.4 Whilst the majority of representations received in response to Preferred Option 4
supported the town centres first approach, concern was raised regarding the supply
of brownfield land to meet London Plan targets over the next ten years and beyond
and whether this option is sustainable long term. A suggestion was put forward by
one agent that a contingency for an alternative approach to delivery be provided to
allow any necessary release of Green Belt or MOL land to meet the Council’s target
in a planned fashion. Another representation states that it is not essential to
concentrate on a town centres first approach and whilst there are some benefits, the
Council should adopt a flexible stance.

2.5 Most representations received in respect of preferred Option 5 (existing
brownfield sites and windfall sites at a density that respects local character)
supported this as a preferred option however concern is raised in one response
about the inclusion of windfall sites in the five year supply. Concern was also raised
over the ability of this option to deliver all new housing (as this has not been
substantiated by a robust and reliable evidence base to demonstrate that this option
is the most appropriate approach to delivering the vision and objectives).

2.6 Almost all representations received in response to Preferred Option 6 (protection
of residential gardens) agreed that this is the most appropriate approach. However
one response suggested that the option is developed further with flexibility to allow
for well-designed new housing to be developed on garden land and to ensure that it
is not interpreted as a ban on all such development.

2.7 Nine out of the ten representations received in respect of Preferred Option 7
(renewal of existing residential areas) supported this as a preferred option. One
representation received from a residents association stated that they feel greater
priority needs to be given to bring empty homes and derelict empty houses into
residential use. Another representation received from an agent (acting on behalf of a
land owner) stated that it is inappropriate for the Council to adopt a dogmatic
approach to resisting the loss of existing housing stock.
Quality and Design (Preferred Options 9 and 11)

2.8 Preferred Option 9 states that the design of all new housing developments should be of a high standard and layout and enhance the quality of local places whilst respecting local character, spatial standards, context and density. The majority of representations received support this as the Preferred Option. One response did however suggest that the London plan density matrix should be applied pragmatically where there is a clear opportunity to provide for increased numbers of residential units. Also the GLA highlight potential conformity issues with London plan Policy 3.4 and state in their representation that in general new development in Bromley should conform with the density ranges set out in the density matrix. London Plan Policy 3.4 is sufficiently flexible to accommodate instances where the local context and character dictate that this is not appropriate. The GLA state that high density development does not have to have a detrimental impact on the character of the Borough and that the Council are encouraged to explore additional design guidance which focuses on high quality, high density development.

2.9 There was general support for Preferred Option 11 which relates to housing as part of a mixed use development.

Affordable Housing (Preferred Option 12)

2.10 Preferred Option 12 seeks a 35% target for affordable housing on sites of 0.4ha or larger and on sites capable of providing 10 dwellings or more. Whilst there was support for this as a preferred option, a number of representations made suggestions that the policy should be flexible and the amount of affordable housing sought should be subject to viability. One representation put forward that Option 16 should be the preferred option even though it was more complicated. Option 16 suggests increasing the affordable housing target and provision in some areas and decreasing it in others.

2.11 It was considered that seeking financial contributions on sites providing 1-9 dwellings should not be a preferred option and there is a need for flexibility in the wording of policies seeking payments from smaller developments having regard to viability.

Specialist Accommodation and the application of the principles of affordable housing to Care Homes (C2) (Preferred Options 18 and 20)

2.12 The Council were commended for the acknowledgment of the ageing population and the higher survival rates across the age spectrum, and for the Council's aspiration to provide appropriate accommodation. Representations agreed that in reflecting the varying needs of the Borough's population, housing policies should provide for a mix of housing types and tenures, specifically addressing the need for specialist accommodation for the elderly/ageing population. It was acknowledged that there is some ambiguity in the Use Class classification for many forms of specialist accommodation for the elderly.

2.13 Whilst the London Plan does recommend that Council's consider seeking affordable housing contributions from Care Homes and other C2 Use Class developments, (as put forward in Preferred Option 18) a number of providers were concerned that if affordable housing policy is applied to this type of development it
could prevent it from coming forward. Representations suggested that this would be in conflict with Preferred Option 20, which seeks to encourage the provision of specialist, and supported accommodation and felt that any policy to seek affordable provision should be robustly justified by the Council. It is important to note that under the current adopted Affordable Housing SPD (para 6.27) proposals for sheltered housing and extra care homes are already subject to other residential policies, including affordable housing.

**Renewal Areas (Preferred Options 22, 25)**

2.14 The GLA and the neighbouring boroughs of Croydon and Bexley support the renewal area designations and welcome the opportunity to work across borough boundaries in “Crystal Palace, Penge & Anerley” and “The Cray Valley” (adjacent to the Fooths Cray sustainable growth area in Bexley). Lewisham also wish to be kept apprised of strategic/cross boundary issues in relation to Renewal Areas. English Heritage are encouraged by the use of “Places” but queried how the places were defined.

2.15 Natural England support the principle of preparing development briefs (where appropriate) for development opportunities relating to Renewal Areas, to maximise their contribution to social, economic and environmental improvements (Preferred Option 28). They highlight that environmental benefits should not be an afterthought in the planning process, rather the retention, protection, enhancement and their ongoing management should be clarified through Development Briefs.

2.16 A number of representations refer to specific sites. “The Cray Valley” Renewal Area includes land at business parks at Crayfields. Legal and General are landowners in this area and suggest two areas adjacent to the existing employment areas could be designated for business to support renewal and address issues in the Renewal Area. Cray Wanderers FC wish to return and grow within “The Cray Valley” Renewal Area through a sport led mixed use development where they feel they have a significant part to play in the social, economic and environmental well-being of that Renewal Area.

2.17 Bromley College highlight the quantity and quality of college facilities, located in “Bromley Common” Renewal Area, which provide education and training, supporting Renewal Area improvements.

2.18 A further representation was received for a site for residential development in Chislehurst, however, the site lies outside both the Mayor’s Regeneration Areas and the Boroughs proposed “Renewal Areas”

**Gypsies and Travellers (Preferred Options 29, 30 & 32, 33, 34, and 35)**

2.19 There is support on behalf of Gypsies and Travellers and from the London Gypsy Traveller Unit (LGTU) for the options to further expand Local Authority sites (Option 29) and to allocate the long standing sites as travellers sites (Option 30) and the point is made that these should be safeguarded for future provision. The London Borough of Croydon supports the allocation of a number of temporary sites close to the Borough boundary which it acknowledges have been in use for a long time and whose need for school places is met across the boundary in New Addington.
2.20 One respondent objected to the provision of sites for Gypsies and Travellers.

2.21 Representations, including from the LGTU, emphasised that the two options (29 and 30) alone would be insufficient and they did not therefore support the option to resist allocating further sites (Option 31). These responses emphasised the need for a robust and up to date assessment of need, including consideration of hidden/latent need, and family formation. Reliance on sites without an occupancy restriction (Chalkpit and King Henry’s Drive) was queried. In fact both land owners have now indicated their desire to be excluded as options and, given that they have unrestricted caravan permissions it would be appropriate to withdraw these sites from the proposals. (N.B. King Henry’s Drive is also no longer occupied by Travelling Showmen and hence can also be withdrawn from the assessment in respect of need).

2.22 The Showmen’s Guild advise that previous advice from a Guild officer, indicating that previously agreed permissions for Showpeople at Layhams Road meet all current needs, were incorrect and that there is a need for two additional plots in Bromley. They advise that extending the site towards Sheepbarn Lane would finally meet the need. The original statement was made in relation to showpeople living on site at the time whereas they suggest that the Government guidance “Planning for Travellers” is clear and that a homeless family should not be disadvantaged for not having moved onto site in advance of permission but should in fact be rewarded for this. This view is supported by a representative of the family commenting that there is currently doubling up on plots.

2.23 The LGTU recommend that the London Gypsy Traveller Accommodation Needs Assessment (GTANA) should be used as the baseline figure to inform the strategic policies set out in the Bromley Local Plan and wish to challenge the limit of site options to the Green Belt. Given the land constraints identified the high level of need for new pitches, they recommend a more innovative and inclusive approach in identifying the required site allocations, including a policy response which considers the provision of Gypsy & Traveller pitches as part of mixed use developments.

2.24 Comments on the criteria based policies for both Gypsies and Travellers and Travelling Showpeople (options 32 and 35) include a representation from Natural England emphasising the importance of considering environmental factors, specifically landscape and habitats and concern was raised, on behalf of Travellers, that this approach offers no certainty of meeting future need.

2.25 Neighbouring local authorities - Bexley, Lewisham and Croydon all support collaboration on Gypsy and Traveller issues generally and specifically on transit sites and Travelling Showpeople. However, representations on behalf of travellers are dissatisfied with the approach to seeking a sub-regional transit site, which they feel is a delaying tactic additionally it is suggested that most families prefer to stop on family owned sites rather than on purpose built transit sites.

2.26 Whilst an assessment of potential pitch numbers within the proposed allocated Traveller Sites offers flexibility in respect of the longer term need, the assessment will need to be revisited in the light of the withdrawal sites as possible locations the revised needs position put forward by the Showmen’s Guild.
3 SUPPORTING COMMUNITIES

Community Uses (Preferred Options 35 and 36)

3.1 There is broad support for Options 35 and 36 from a range of stakeholders including Bromley College of Further Education and Cray Wanderers. The GLA recommend the option be expanded to read “provision, retention and enhancement”. Other representations seek an additional reference to libraries and emphasise the importance of maintaining community centres. Bromley Children & Families Voluntary Sector Forum highlighted when plans are developed care needs to be taken to harness the knowledge/skills held within the ‘voluntary sector’, who have the potential to add significant value.

3.2 Representations on behalf of a leisure landowner, proposing a residential development, stressed the need to assess whether facilities are needed in a particular location.

3.3 The Chislehurst Society and Babbacombe Road Residents Association support the local identification of community facilities.

3.4 Croydon Council advise of their protocol to assist the development management process in relation to proposals involving the loss of community facilities trialling an approach which requires applicants to contact community organisations who may have a need for the site.

Planning for Social Infrastructure (Preferred Options 37 and 38)

3.5 The town centre first approach is generally supported by the GLA and other stakeholders but with emphasis on the point made in the document that there should be scope for alternative locations where appropriate relating to the specific needs of the area and the scale of the catchment for facilities (smaller catchments needing facilities in locations in addition to town centres to ensure accessibility).

3.6 Bromley College of Further Education note these options also recognise the potential to enhance existing facilities, with mixed community uses enhancing their long term sustainability. This “community hub” approach is also supported by Babbacombe Rd Residents Association and Cray Wanderers. The London Fire and Emergency Planning Authority (LFEPA) comment that should fire stations be declared surplus they consider the most appropriate use to be as residential.

Education (Preferred Options 39, 40, 41 and 42)

3.7 There is broad support for the option to ensure facilities from early years through to Further and Higher education, although one comment raised concerns about the increase in numbers of school children. Croydon Council support the designation of “Education Land” (Option 40) and suggests that given the forecast increase in school rolls this designation could be extended to other sites – e.g. vacant police stations, empty care homes, redundant hospitals etc. The Chislehurst Society comment that “Education Land” designation should not apply to sports grounds, owned or used by an education institution and separate from any education buildings, whilst another representation comments that not all existing sites are appropriate and could instead be disposed of to finance education elsewhere.
3.8 The assessment of need to inform the allocation of new sites is supported and the GLA highlight the criteria approach in the London Plan.

Health and Healthy Environments (Preferred Options 43 and 44)

3.9 Natural England support Option 43 highlighting the contribution made by the natural environment, by accessible natural green space and particularly to the provision of attractive opportunities for walking and cycling to health. They also note the need for new housing development to take account of infrastructure provision as well as the provision of green space, wildlife and recreation areas, in order to promote health and wellbeing.

3.10 The approach to acknowledging health throughout the plan was supported, although a representation highlights debate around Climate Change. Bromley Cyclists draw attention to active sustainable options (walking and cycling) in the plans Getting Around section, flagging that these offer great potential in respect public health, referencing the British Medical association (BMA) and specifically the National Institute for Health and Clinical Evidence (NICE), which indicates that health improvement should be an objective in all transport policy development (“Healthy transport = Healthy Lives” 2012).

3.11 There is also support from residents associations and a desire to be actively involved in defining community needs for local health facilities.

Leisure and Recreation, Play and Youth (Preferred Options 46, 47)

3.12 There was broad support and endorsement from residents groups, individuals and leisure and recreation providers, including those seeking sites, and other stakeholders for the option to encourage sports and recreation facilities and secure enhancements where appropriate opportunities arise (preferred Option 46). One comment noted that such facilities were “essential … to ensure the long term physical and mental health of the community” and flagged the need to ensure the great opportunity to improve provision within the Borough to all sectors of the community as part of the legacy of the 2012 Olympics games. The Bromley Children & Families Voluntary Sector Forum feel strongly that work encouraging provision should include relevant voluntary sector organisations (with specific expertise working with individuals who have learning difficulties) and also those that provide a general community service (e.g. youth organisations). Natural England also flag the importance of supporting leisure activities, particularly for young people and for generating a sense of local identity and community. They make the explicit link between health, leisure and a quality green spaces and biodiversity. A response highlighted the need for this option to be underpinned with hard & measurable targets and another demanded no building of any sort within the Green Belt.

3.13 Two responses from owners of leisure facilities, both of whom support the encouragement of the provision of sports and recreation facilities, make comments about need and viability. One which again noted their importance in enhancing the health and wellbeing of residents and helping to nurture a sense of local identity and community participation, particularly amongst young people, highlighted the importance of ensuring the long term sustainability of such facilities. The other representation from the owners of a leisure site, seeking residential development,
commented that facilities have to be in locations where they are genuinely required and that following an examination of need the Council may consider a flexible approach to the re-development of sites, particularly for larger sports fields where little demand exists. Conversely, The Chislehurst Society, feel there should be greater emphasis on the protection of existing facilities so as to avoid pressure for change of use of facilities that may lead to the eventual loss of open space.

3.14 The protection of smaller open spaces (option 47) is supported by residents groups, who wish to be involved in the policy development in their areas together with other stakeholders, noting the important contribution they make to the local area. Natural England specifically reference the encouragement of additional public open space in areas of deficiency. A representation from Intu suggests that the protection of valuable smaller open spaces should be balanced against the wider objectives of the Local Plan (including the Bromley Town Centre Area Action Plan). Accordingly, development proposals located on / adjacent to smaller open spaces should be considered on their merits.

Allotments (Preferred Option 49 and Option 50)
3.15 All representations supported the encouragement of allotments and one stressed the need for old under-used sites to be made available to the community.

Burial Sites (Preferred Option 51)
3.16 Views on burial sites were not generally supportive of additional sites although they seem to refer to internments which it was suggested totally change the character of such sites and are unsustainable. The decline in internments was highlighted and investment in cremation services suggested.

Other Strategic Matters
3.17 The Theatres Trust highlight the importance of support for culture, increasingly seen as an investment in an area’s present and future quality of life. It flags growing awareness of the role that the arts and culture play in developing an educated workforce and in attracting an educated workforce. They suggest that specific protection is vital for cultural facilities and that policies should include criteria to avoid the loss of any cultural/community asset or change of use, except in exceptional circumstances where a replacement facility may be required. They also point to the potential for pubs to be transformed as additional venues for live music and comedy, new plays and dance, making a vibrant contribution to a town’s evening economy.

3.18 A residents association support attempts to protect local communities and the provision of facilities that are important to such local communities as quoted within this section i.e.; “corner shops, pubs, theatre etc. Specifically, they express support for setting up of Neighbourhood Forums they consider would enable Residents’ Associations the means to effect control over their locality.

4 GETTING AROUND

Parking (Preferred Options 52 and 53)
4.1 There were two preferred options in this section. The preferred option 52 of minimum parking expectation for residential development and preferred option 53
'parking provision at key transport interchanges' was supported by the majority of the individuals that responded to Question 49.

4.2 However the GLA have responded that the approach of minimum parking expectations for residential developments and flexibility for all other uses is not in conformity with the London Plan. The London Plan only recognises the potential for flexibility for public car parking serving a town centre as a whole and office developments in outer London subject to certain criteria. One agent suggested that adopted policy should take into account opportunities to promote and allow car free development on sites with good accessibility to public transport/employment etc. thus freeing up land for housing provision.

4.3 The Highways Agency agreed with the preferred option of parking at key transport interchanges as long as there was no adverse impact on the Strategic Road Network (SRN) in the form of increased traffic, queues and delays.

4.4 However ‘parking provision at key transport interchanges’ (preferred option 53) was not supported by one residents’ group, which pointed out that the increase in car use would cause congestion and blighting the immediate neighbourhood. Specifically referring to future development at Site A (Bromley Town Centre Area Action Plan) it was suggested that the current take-up of car parking facilities has been continually underused over a period of many years.

4.5 Additionally the GLA thought this preferred option would undermine policies to encourage more walking, cycling and public transport. The GLA stated that policy should be subject to clear assessment and criteria e.g. existing and potential improvements to pedestrian, cycle and bus links, impacts on congestion, potential for Controlled Parking Zones (CPZs) introduction/extension to ensure no net increase in parking availability.

4.6 Other respondents suggested allowing more street parking for commuters, more bike racks, to mark out reserve places for car sharers, and that there was no pick up or drop-off at Bromley South Station.

Relieving congestion (Preferred Options 57 and 58)

4.7 Overall, the preferred option 57 of pinch point mitigation measures, was supported by most respondents however, the GLA commented that the approach to congestion relief be broadened to reflect policy in the London Plan, and refer to supporting criteria. The Highways Agency suggested the option should consider impacts on the strategic road network as there were known pinch points outside of the borough for example the M25.

4.8 An agent was concerned that no alternatives were offered by the Council and considered this option conflicts with the preferred option in respect of parking provision. A Residents’ Association commented that we should seek to ensure that no new development created a new pinch point.

Access to services for all (Preferred Options 59,60, 61 and 62)

4.9 This topic had four preferred options in all. Firstly preferred option 59 ‘Developer to provide safe and accessible pedestrian and cycle routes within schemes’ was
supported in all of the representations. However, an agent suggested the policy should be developed to state ‘where possible and/or appropriate’ stating that site specific considerations may hinder the ability for delivery of such routes.

4.10 The Highways Agency agreed in principle but added the measures need not be restricted to developers and transport providers because the Local Authority has a responsibility in this respect.

4.11 Secondly the preferred option 60 of ‘Developer contributions towards cycle routes’ again was supported by the majority of respondents, but one was concerned that ‘Large retailers’ must also contribute to the cost of cycle routes and pedestrian access, whilst another commented that this would encourage ‘excess expenditure on cycling’. The GLA advised the preferred option could be extended to walking routes and added that the London Plan cycle parking standards had been reviewed.

4.12 Thirdly, the preferred option 61 of ‘Developer contributions towards transport services and interchanges’, was broadly supported. However the GLA asked for the defining of ‘accessibility’ in this and the fourth option, and one agent said the ‘level of contribution needs to be constrained’.

4.13 Fourthly, the preferred option 62 ‘Public transport developer contributions’ was again supported by the majority of representations. The GLA referred to the introduction of CIL replacing planning obligations of this nature and that this policy will have to be worded appropriately embedding CIL both local and Mayoral within the Local Plan is required. The GLA stated that major schemes /public transport improvements that could benefit the borough and developer contributions toward these will be important. Network Rail stated they should be seen as an integral part of local transport networks and welcomed further discussion as section 106 and CIL revenue could play a vital role in developing London’s rail network and wish to be part on discussions on the proposed Council Transport Strategy.

4.14 Finally only one respondent did not like the way any of the options were “worded nor the principle they embody that developers of property should contribute to public transport provision”. Importantly a developer suggested that all planning obligations of this nature should be delivered as part of the Community Infrastructure Levy (CIL) and published on the Councils Regulation 123 List and that the Council could clarify how these policies sit alongside CIL regulation.

Public Transport Investment Priorities (Preferred Options 64 and 65)

4.15 The preferred option 64 relating to DLR extensions, which states the intention to “promote the extensions of the DLR to Bromley North including by safeguarding sufficient land to enable construction and operation, in particular at former Bromley Town Centre area Action Plan Site A” providing a direct link to London, was welcomed. However, several representations mentioned the need to safeguard sufficient land to enable construction, and one group queried the amount of additional land that may be required. The GLA advised there is a need to support major investment in public transport with higher density development. LB Lewisham responded that it has a number of issues that need to be resolved in relation to the proposed route of the DLR. Whereas Network Rail supported the general principle but would like the preferred option broadened to state “promote the rail capacity and
4.16 Preferred Option 65 regarding Tramlink extensions to Bromley Town Centre and Crystal Palace, improving accessibility and orbital public transport routes to Bromley Town Centre, was supported. The GLA reiterated that the safe guarding of land should be included. Regarding option 67 “Over ground rail linkages” which was not preferred because of the impact on the case for the DLR, the GLA felt that ‘a number of options for improving public transport connections to the borough are still being considered and there is on-going work to assess the costs and benefits of each option on a consistent basis. Therefore discounting options at this stage is premature’.

Question 60

4.17 Question 60 which asked for additional issues that may require strategic policy received a few comments. Importantly two local residents/households requested the urgent review of that part of the A21 safeguarding line affecting 2-16 Bromley Common and its urgent removal before the Local Plan proceeds any further because of the consequent effects of this designation affecting the owners for some years now.

4.18 The GLA asked for development of the area of ‘servicing of premises road safety to include covering the need for construction logistics, delivery and servicing plans and promotion of sustainable freight distribution’ to accord with the London Plan and an expansion of the strategic policy on public transport (i.e. more than planning obligations) in particular the promotion of the bus network and associated needs including safeguarding, garaging and driver facilities. The GLA also reiterated the need to embed the CIL in the Local Plan and added the developer contributions to the possible DLR extension and other public transport schemes because as yet funding has not been identified.

4.19 One group asked that developers should design developments with cycle routes through natural lines of travel adjusting development to improve access to current cycling infrastructure. Finally, another group felt that the general tone of this chapter was “unambitious and fails to address reality; that sustainable and particularly sustainable options (walking and cycling) address so many of the issues which the plan has to tackle”.

5 BROMLEY’S VALUED ENVIRONMENTS

5.1 Although the ‘Options and Preferred Strategy’ consultation did not make a ‘call for sites’ a number of landowners submitted sites, primarily requesting removal from the Green Belt and allocation for housing, or in some circumstances employment or other uses.

Open and Natural Space (Preferred Options 68, 69, 70, 71, 72, 73 and 74)

5.2 There was general support for the Preferred Option 68 review and define all open space designations with 14 of the 15 respondents in agreement, with many specifically referring to a review of the Green Belt in relation to its five functions set out in the NPPF. Specific mention was made of particular sites, from owners,
developers or others with an interest including Cray Wanderers, Keston Garden Centre, Flamingo Park.

5.3 Many local residents and groups emphasised the importance of protecting the Green Belt, (and other open space designations) with meeting housing need given as the reason for reviewing and potentially amending it. Any review of open space designations should be in the context of the housing need and supply discussion, supporting infrastructure and employment land provision.

5.4 The protection of the character of the borough, in historic and development terms was supported, some commenters highlighted that this can allow change and that some areas of the Borough character can be improved.

5.5 Biggin Hill Airport Ltd agreed and asked that the Green Belt boundaries at Biggin Hill are reviewed to provide ‘insets’ that remove Green Belt from existing and future development areas, and gave the example of South Camp. They made specific comments in relation to the different areas such as West Camp, The Terminal Area and East Camp,

5.6 The one respondent disagreeing stated that Council policy should be no building on Green Belt land.

5.7 Preferred Option 69 regarding the protection of designations once defined was supported, with one respondent disagreeing stating that ‘proposals related to designated areas of open space will contribute to future maintenance, level of sue and enhanced access to such places through partial development will need to be judged on their individual merits’. The GLA asks that Council’s strategy should extend to the Regionally Important, Local Important Geological Sites to protect and enhance these sites in lie with the London Plan Policy 7.20.

5.8 Preferred Options 70, 71 and 72 relating to the All London Green Grid Supplementary Planning Guidance being incorporated into the planning policies, developing policies to improve use of and access to open space, and working with neighbouring boroughs were supported.

5.9 Preferred Option 73 regarding the incorporation of green spaces in all Area Action Plans or Neighbourhood Plans by way of site allocations is supported by two Residents Associations. However, Signet Planning, on behalf of the owners of the former GSK site ,state ‘designating new open ‘green’ space needs to be balanced against the Councils ability to deliver new housing as it is acknowledged that ‘existing open space designations restrict he number of large sits which can come forward for housing’ and acknowledges that new public realm/amenity/open space doesn’t necessary need to be ‘green’ to successfully provide benefit to the community’.

5.10 The Involvement of ‘Park Friends’ in the development of open space policies (PO74) is supported.
5.11 Any review of open space designations should be in the context of the housing need and supply discussion, supporting infrastructure and employment land provision.

5.12 The protection of the character of the borough, in historic and development terms was supported, some commenters highlighted that this can allow change and that some areas of the Borough character can be improved.

**Built Heritage (Preferred Options 75, 76 and 78)**

5.13 There was general support for the options for the built environment with specific comments made in relation to Preferred Option 76 regarding Areas of Special Residential Character.

5.14 English Heritage highlight the need to ensure heritage assets are protected. They wish Bromley to conserve the historic and local character of the area especially in the town centres and in particular in Bromley town centre where several high rise buildings are proposed. Local organisations have highlighted the importance of retaining and enhancing the local character both of residential areas and town centres.

5.15 Chelsfield Park Resident’s Association, who are seeking designation as an ‘Area of Special Residential Character’ have concerns about the impact on existing ASRCs of updating the criteria. Fearing alteration could be interpreted as a measurable decline in Bromley’s residential character in contrast with its visions and objectives.

5.16 The Chislehurst Society put forward a formal report to Officers regarding specific improvements for Chislehurst High Street and Belmont Parade. To this end it has submitted (November 2012) a report “Chislehurst High Street – Proposals for Improvement” prepared by the Chislehurst Town Team, comprising people representing a wide range of interests.

5.17 One respondent disagreed with Preferred Option 78 regarding working closely with the Bromley Museum, the Museum of London Archaeology Service and English Heritage to ensure the protection of Areas of Archaeological Significance, although there was no reason given.

5.18 Additional comments in relation to this section referred to the ASRC criteria to be applied to all new developments including spatial standards, and the provision of community facilities, such as toilets/washroom which enable better use of public space and especially sports activities to be more widely supported.

**6 WORKING IN BROMLEY**

**Strategic Industrial Locations (Preferred Options 79 and 80)**

6.1 There was general support for employment land and the local economy, taking forward the Strategic Industrial Location designations in the London Plan for St Mary Cray and Foots Cray Industrial Park, however, there were different views as to how this should be translated into designations and flexibility between types of employment use.
Business Area Designations (Preferred Options 81)
6.2 A number of representations were made concerning flexibility being applied to the designated Business Areas, with suggestions that proposals be judged on their merits in terms of employment generation rather than the rigid use-class criteria, in order to allow other functions such as health facilities and leisure. A flexible approach would allow responses to changes in economic circumstances so that Business Areas are supported by complementary uses that contribute to economic development.

6.3 A review of the Green Belt in-between two industrial estates in a built up area in the Crays was proposed on behalf of the owner for A-grade business (office based) employment.

Development Outside Business Areas (Preferred Option 84)
6.4 Respondents supported options for flexibility to encourage the redevelopment of former industrial sites (which are redundant with no prospect of re-use in the future) to alternative employment uses. It was argued that mixed-use schemes would provide refurbished business space that is economically viable, in line with the emphasis on viability as set out in the NPPF.

6.5 Similarly, representations were put forward that the options protecting employment land were too restrictive. The Council should avoid the long-term protection of sites as this is not consistent with the NPPF. Policy should aim to be positive in encouraging growth rather than stifling growth with a long list of criteria.

Future Requirements for Office Floorspace (Preferred Options 86, 89 and 90)
6.6 Representations were received concerning GLA evidence that highlights a strong need for the Council to consider mixed-use development in light of the decline in Outer London office centres. Mixed-use development will help bring forward new employment generating uses, refurbished attractive offices and also homes. The GLA raised the issue of potential non-conformity regarding offices. While Croydon and Bexley support the protection of employment land in line with Bromley as a ‘restricted’ Borough in the London Plan for the loss of business/industrial land.

Biggin Hill Strategic Outer London Development Centre (Preferred Options 91, 92, 93 and 95)
6.7 Representations supported the Strategic Outer London Development Centre (SOLDC) designation of Biggin Hill, notably the GLA and Biggin Hill Airport on behalf of the LoCATE initiative. Points were made that wording of policy needs to be more positive and action orientated as per the London Plan. It was highlighted that the SOLDC requires clear land designations if the growth is to be realised as per the London Plan. A review of the Green Belt constraints is welcomed in order to increase certainty and confidence for investors to support aviation technology and related business (office/hi-tech R&D) growth.

Making sure the Borough remains competitive relative to London and the South East (Preferred Options 96 and 97)
6.8 There was general support expressed with the recognised need to focus new development in the town centres and not allow out of town development and to
consider the extent of the shopping centres and the role of primary and secondary frontages. LB Bexley was supportive and asked to be kept advised of any new retail developments in Sevenoaks Way.

**Bromley Metropolitan Town Centre** (Preferred Options 98)

**6.9** Revisiting the contribution the former Site A in the Bromley Town Centre Area Action Plan can make to the development of the Town Centre is supported by Babbacombe Road Residents’ Association and Boyer Planning. The latter, representing a key landowner expressed their wish to be involved in the process.

**Continue to develop and grow Orpington** (Preferred Options 99, 100 and 101)

**6.10** The three respondents for these options to encourage a mix of new retailer and businesses, encourage more independent shops and continental markets and encourage the re-use of upper floors supported the preferred options with a specific comment suggesting encouraging a fruit and vegetable market which would help increase footfall and the town centre.

**Ensuring the Vitality and Viability of the Borough’s Town Centres** (Preferred Options 103, 104 and 105)

**6.11** There was support for these options, although a query from Babbacombe Road Residents’ Association as to why clustering restaurants and pubs is not a preferred option and a comment that before extending the recreation and leisure offer in district centres it seems important to assess the options of extending the offer on existing recreation and leisure sites in the borough, including landholdings at Copers Cope Road.

**Ensuring an adequate supply of local shops and community services** (Preferred Option 106)

**6.12** There was concern with this preferred option to prevent vacant units from staying empty by allowing a variety of use classes from Petts Wood and District Residents’ Association that there may be a local parade with no shops. Babbacombe Residents’ Association suggested that the non-preferred option 108 to remove local parade designations where all shops units are vacant or with non A1 designations.

**6.13** English Heritage highlighted the heritage assets in many of the town centres and advised that strategic management should include an explicit reference to how these will continue to be conserved and enhanced, and policies should demonstrate an understanding of historic and local character. Other town centre related detailed comments were raised in relation to, strengthening the shopping offer in The Glades, leisure and recreational sites in and around town centres, protect current residential properties from overdevelopment and taking into account local circumstances (particularly Bromley and Beckenham).

**7 ENVIRONMENTAL CHALLENGES**

**Sustainable design and construction, carbon reduction and renewable energy** (Preferred Options 109, 111, 114, 115, 116, 117 and 118)

**7.1** There were 17 representations on the Strategic Options for sustainable design and construction standards, carbon reduction and renewable energy. Of these, the majority supported the suggested Preferred Options.
7.2 With regard to sustainable construction standards, there were opposing views as to the merits of using the Code for Sustainable Homes as a benchmark, with equal support and objection to the Preferred Option (of not using the Code).

7.3 The proposal to continue using the London Plan targets for carbon reduction in new development were supported by two out of three respondents, the one objector preferring there to be no policies relating to carbon reduction. The GLA requested that the local policy should be flexible enough to reflect updates to the Building Regulations and the London Plan and include a requirement to submit an energy strategy for Major developments.

7.4 There was general agreement on the preferred Strategic Option to encourage development of local energy networks and the GLA reiterated the importance of using the energy hierarchy set out in the London Plan. In terms of the renewable energy requirement, there was support for the preferred option, but one respondent raised concerns about its potential impact on the viability of development.

Flood risk management and sustainable drainage (Preferred Options 120 and 121)

7.5 All nine people and groups that commented in the issues of tackling flood risk and improving drainage were in support of the Preferred Options. The Environment Agency (EA) made the most substantial comments, requesting to be involved in the development of policies in the Local Plan as it moves forward. The EA suggested that the Preferred Option on Flood Risk Assessments be expanded to include additional areas including those identified in the Strategic Flood Risk Assessment (SFRA) and the Local Flood Risk Strategy. They reiterated that the SFRA needs to be updated so it can accurately inform the plan.

7.6 Two respondents agreed with the Preferred Option to require Sustainable Urban Drainage Systems in accordance with the London Plan and EA guidance rather than develop local criteria but the EA recommended that the Options be merged in order to ensure the Borough (as Lead Local Flood Authority) address their key role under the Flood Water Management Act 2010.

Waste management (Preferred Options 126 and 127)

7.7 The key representation made about the Strategic Options for waste relates to whether the Borough can show that it will be able to meet its waste apportionment targets set out in the London Plan. The GLA state that The South East London Waste Partnership Technical Paper – which summarises the various boroughs’ waste arising and capacity - does not currently satisfy the requirements of the policy and they recommend that the Council identify any agreements that Bromley have made with other boroughs for pooling its targets.
DEVELOPMENT CONTROL COMMITTEE  
Minutes of the meeting held at 7.30 pm on 7 January 2014

DEVELOPING BROMLEY’S LOCAL PLAN - DRAFT POLICIES AND DESIGNATIONS FOR CONSULTATION

Members were requested to endorse Appendix 1 of the report as the consultative ‘Draft Policies and Designations’ stage in the preparation of Bromley’s Local Plan. Following approval from the Executive, this document would form the basis of consultation with residents, partner organisations and the wider community, scheduled for early 2014.

Member comments, questions and suggestions together with officer responses (where applicable) are set out below.

<table>
<thead>
<tr>
<th>Member Comments, Questions and Suggestions</th>
<th>Officer Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>It should be noted within the document that Site L: Former DHSS Building at Bromley South had been sold to the Education Funding Agency for the purpose of establishing a Free School. This site had been previously earmarked within the Bromley Town Centre Area Action Plan as a site for mixed office and residential use.</td>
<td>Noted.</td>
</tr>
<tr>
<td>Page 115 – Conservation Areas. Unlike the draft policy on Locally Listed Buildings, no reference is made to the Council having a policy of considering applications for Conservation Areas in the future.</td>
<td>Reference to potential new Conservation Areas could be made although this would be dealt with under a separate process. Areas of Special Residential Character are considered through the Local Plan process. The proposed continuation of Policy BE14 – Trees located within Conservation Areas, was omitted in error from the document.</td>
</tr>
<tr>
<td>Page 43 - Housing Supply: There is potential here for non-conformity with the GLA. 470 additional homes per annum over a 15 year period is the correct one for Bromley. The Council should continue to fight for this.</td>
<td>Noted.</td>
</tr>
<tr>
<td>Page 83 - Parking: Whilst there is potential for non-conformity with the GLA, the minimum standard for Bromley is justified. Flexibility should be maintained for parking in Outer London.</td>
<td>Noted.</td>
</tr>
<tr>
<td>Page 56 - Conversion of non-residential buildings to residential: Additional reference should be made to not adding undue parking</td>
<td>Noted and additional clause to be included.</td>
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and highway pressures on the area.

<table>
<thead>
<tr>
<th>Page 100 - The Green Belt: This should highlight that the surrounding edge of Green Belt land is the most vulnerable because once it is developed, the remainder of the land would become vulnerable.</th>
<th>The Draft Policy on page 103 of the report refers to land adjoining Green Belt or Metropolitan Open Land. The Draft Policy on page 100 protects all Green Belt land however, supporting text could be supplemented.</th>
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<tbody>
<tr>
<td>Page 54 - Side Space Policy: The 1m side space which applied to buildings consisting of two or more storeys should also apply to one storey buildings.</td>
<td>The Side Space Policy was introduced to prevent the appearance of terracing however, there are other policies which refer to layout and character of areas more generally which provides protection. Applying side space policy to one storey would need to be considered in more detail and separately to this consultation.</td>
</tr>
<tr>
<td>Page 96 - Development and Trees: The final sentence should be amended to read: 'When trees have to be felled, the Council will seek suitable replanting of native species.'</td>
<td>Will be amended to read as suggested.</td>
</tr>
<tr>
<td>Page 97 - Conservation and Management of Trees and Woodlands: Reference should be made to ensuring there is sufficient room for trees to grow to their full size and potential.</td>
<td>Supplementary Planning Guide can provide information on detailed requirements.</td>
</tr>
<tr>
<td>Page 151 - Working in Bromley: Comments regarding the loss of offices and the permitted developments rights to allow a change of use without seeking the Council’s consent, raised concerns as to whether there was sufficient protection.</td>
<td>DCC had considered Article 4 requests for three areas within Bromley Town Centre namely, London Road, Bromley North Station and the extension at Bromley South. These would be submitted for Portfolio Holder consideration at the Renewal and Recreation PDS meeting to be held on 28 January 2014.</td>
</tr>
<tr>
<td>Page 104 – There was concern that Urban Open Space would not have the same protection as Green Belt Land.</td>
<td>Green Belt and Metropolitan Open Land have the same protection. Urban Open Space has a different function and has protection but not at the same level. The NPPF brought in a new designation - Local Green Space (LGS) and areas could be suggested for consideration as part of the Local Plan process. Whilst small areas and all Urban Open Space could not</td>
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<tr>
<td>Page Range</td>
<td>Statement</td>
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<tr>
<td>Pages 183-184</td>
<td>It should be noted that the proposed development at Chipperfield Day Centre has commenced. Although the proposed development at Grays Farm Production Village had been permitted, this was no longer going ahead and may affect the target for housing provision.</td>
</tr>
<tr>
<td>The possible removal of Green Belt status had been omitted from the document. This was discussed at a meeting of the Local Framework Advisory Panel on 4 December 2014.</td>
<td>This would be reviewed and reported back to Members.</td>
</tr>
<tr>
<td>Page 65 - Crystal Palace Penge &amp; Anerley Renewal Area</td>
<td>The transport infrastructure needs to be reflected.</td>
</tr>
<tr>
<td>Page 65 - Crystal Palace Penge &amp; Anerley Renewal Area</td>
<td>The importance of this regeneration site should be reflected on page 139 of the document as a potential area for economic growth.</td>
</tr>
<tr>
<td>Page 11 - Draft Designation Schedule</td>
<td>It does not make sense to designate Bromley Civic Centre for retail use particularly while the Town Centre’s principal shopping centre in and around the High Street is suffering an element of decline. Kentish Way, which lies between the two, would also act as a deterrent. Any new retail use would need to be directly supportive of the existing shopping area.</td>
</tr>
<tr>
<td>Pages 46/47 – Living in Bromley</td>
<td>Residential development schemes should contain a percentage of disabled units, bedsits, 1/2/3 and 4 bedroomed properties. Flexibility on car parking should also be considered especially in developments consisting of 4 or more bedrooms. Should encourage mixed development schemes in Town Centres.</td>
</tr>
<tr>
<td>Page 81 – Burial Space</td>
<td>The only available land that could be suggested as possible burial space is farmland.</td>
</tr>
<tr>
<td>Page 100 – The Green Belt</td>
<td>Fracking could be undertaken on GB land however, this would be dictated by Government.</td>
</tr>
<tr>
<td>Aviation-related activities need to be monitored re. expansion.</td>
<td>Noted.</td>
</tr>
</tbody>
</table>
Councillor Fawthrop reiterated his view that Petts Wood ASRC should be designated as ‘saturated’.

There will be a future Supplementary Planning Document relating to design which could be the most appropriate place to include this. Evidence would also be considered for the next cycle of Local Plan consultation.

The practice of joining together two semi-detached houses to form a single detached house had an impact on Areas of Residential Character – this should be addressed via guidance.

Noted.

Page 177 – 2nd paragraph. Councillor Mellor requested feedback regarding the progress of discussions on the future of Fort Halstead.

An update would be reported to Members.

Members agreed that major changes to side space policy was an important issue and should be considered as a separate item at a future Development Control Committee meeting.

**RESOLVED** that subject to the above comments, suggestions and amendments, the ‘Draft Policies and Designations’ document (Appendix 1 of the report) be endorsed for the Executive to agree its release for public consultation.

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**Appendix 1i**

**DEVELOPMENT CONTROL COMMITTEE**  
Minutes of the meeting held at 7.30 pm on 13 July 2015

**BROMLEY'S LOCAL PLAN - POTENTIAL SITE ALLOCATIONS DRAFT POLICY AND DESIGNATIONS ALTERATIONS’ FOR CONSULTATION**

Members were requested to endorse Appendix 1 as the consultative ‘Local Plan – Potential Sites, Draft Policy and Designation Alterations’ stage in the preparation of Bromley’s Local Plan. Members were also asked to refer the document to the executive for approval for the purpose of consultation with residents, partner organisations and the wider community.

The Chairman reported that progress in drafting the Local Plan had been reviewed by the Local Development Framework Advisory Panel. The Potential Sites, Draft Policy and Designation Alterations’ stage focussed on designating sites in Wards for particular purposes. The latest updates incorporated an increased housing target of 641 units; minimal parking provision and variations to the Biggin Hill SOLDC.

The following comments were made:-
• Living in Bromley (page 135) - the first sentence within the coloured table should read 'The Council will make provision for at least 641 additional homes per annum over the fifteen year Plan period which will be facilitated by: ....'.
• Getting Around (page 136) - with regard to the provision of off-street parking for 1-2 bedroom accommodation, clarification was sought on what constituted 0.7 space.
• Safeguarding land for transport investment (page 136) - One Member was pleased to note the Council's proposal to explore with TfL the potential for improvements at the junction of the A232 Croydon Road and the A233 Westerham Road and Oakley Road as currently this was an extremely precarious junction. Feedback on progress achieved in this matter was requested.
• Potential Draft Site Allocations and Designations (Table 1 - page 139) - One Member was unhappy with the proposal to redesignate land at Turpington Lane for educational use due to the winding nature of the surrounding roads and the inability to prevent vehicles from speeding.
• Potential Draft Site Allocations and Designations (Table 1 - page 140) - The Maybury Works in Worsley Bridge Road was currently industrial, commercial and employment use. The former Dylon site located adjacent to this had been designated for commercial use. Redesignating The Maybury Works to mixed residential would result in an over-intensive use and a request to retain its current designation was requested. Members were informed that retaining the site's current designation would be difficult because whilst it provided employment for 40-60 people, approximately one third of the site remained unused.
• Potential Draft Site Allocations and Designations (Table 1 - page 140) - in regard to Bromley Civic Centre, the words "and other town centre uses" was vague and should be clarified.
• Potential Draft Site Allocations and Designations (Table 1 - page 141) - One Member opposed the expansion of the site at Higham Hill Farm, Layhams Road, Keston. The land was used as a buffer between the road and the showman's site. A long-term strategy was required to locate plots elsewhere.
• School sites should be safeguarded and one Member asked whether this could be done at the determination stage of an application. The Chairman reported the Education Department considered it necessary to redesignate now to present less difficulty in future consideration of applications. It was also incumbent upon the Council to identify and adopt land for educational use. It was noted that if the Council identified enough sites, then applications submitted from elsewhere could be turned down at determination stage.
• Table 2 - Sites not recommended for housing/mixed use allocations (page 143) - A proposal for high density housing at Potters Yard, Turpington Lane was recently refused. An appeal had been submitted for which a decision was yet to be made.
• Members were informed that the redesignation of various schools from Green Belt to Urban Open Space would make it easier in the future for land to be used for education purposes.
• One Member was uncomfortable with the development proposals at Biggin Hill Airport and the removal of Green Belt land from what was an important historical site. The developers had asked for more land to be redesignated than that already included within the consultation document. There was concern that agricultural land next to the site would be used for development purposes; Members were assured that the SOLDC boundary would remain the same and the quality of the environment would be retained.
• It was agreed that Tree Preservation Orders be placed on trees at the Biggin Hill site. The Chief Planner confirmed that provisos would be implemented in relation to re-planting.
• In regard to parking (page 73, paragraph 5), it was noted that three areas had been identified where lower minimum parking standards than the rest of the borough would be appropriate given their higher level of public transport accessibility. Despite this, there was a very high density of housing in these areas and the majority of residents owned cars.

The following officer updates and clarifications were circulated to Members (revised text in italics):
- ‘Appendix One - Draft Consultation Document (pages 23-24)
Show as a Policy/Proposal. Insert at the top of page 24 ‘The following sites are proposed as allocations for consultation purposes:-’ (list as in Appendix One p.24 then follows)

Page 24
After ‘Site Assessment 2015’ (at the foot of the page) insert ‘which is enclosed as Additional Document B. The Broad Locations for growth in the later stages of the Plan are identified mainly due to Opportunity Area, Town Centre and/or Renewal Area status’.

Page 34

Amend Traveller site boundary Map 1 Star Lane (below). The amended site boundary (blue hatched line) limits the site to the extent of existing traveller pitches. The red line, in the DC report, predominantly followed physical features (escarpment/earth bunds).

Page 47/48
Show as a Policy/Proposal: ‘In conclusion, the sites that comprise Table 7 which are set out in full at Appendix 3 (p62-66) are draft allocations and proposals for consultation purposes. All are subject to their being supported by the necessary site specific infrastructure’.

The recommendations set out on page 130 of the report were amended to read (amendments in bold):-
‘That development Control Committee:
2.1 Endorse Appendix 1 as the Local Plan, potential sites, draft policy and designation alterations document for the executive to agree for public consultation. That the Executive:
2.2 Consider the comments from DCC with regard to the Local Plan – potential sites, draft policy and designations alterations, and
2.3 Approve Appendix 1 as the Local Plan – potential sites, draft policy and
designations alterations, document for public consultation, together with any agreed
amendments, subject to the Director of Regeneration & Transformation, in
consultation with the Chairman, being authorised to make any minor alterations to
the document as required, and agree the final supporting documents prior to the
publication.
RESOLVED that subject to the amendments set out above, Appendix 1 be
endorsed as the ‘Local Plan – Potential Sites, Draft Policy and Designation
Alterations’ document for the Executive to agree for public consultation.

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 10 December 2015

LOCAL PLAN DRAFT ALLOCATIONS, FURTHER POLICIES AND
DESIGNATIONS CONSULTATION SEPTEMBER/OCTOBER 2015 INITIAL
REPORT
Members considered the consultation process undertaken in September/October
2015 in respect of the Local Plan ‘Draft Allocations, Further Policies and
Designations’ document. The scale of response was substantial, with over 1,100
individual responses being received, many covering a number of sites/policies and
designations. A further report setting out the key issues arising from the consultation
and their implications for the
Local Plan, would be brought to future meetings of the DCC and the Executive.
RESOLVED that:-
1) the consultation process undertaken with regard to the Local Plan ‘Draft
Allocations, Further Policies and Designations’ document be noted; and
2) the scale of the response be noted with a further report being brought to
DCC and the Executive analysing the responses and their implications for the
Local Plan.

LOCAL GREEN SPACE

Member agreement was sought on the proposed process for inviting sites to be
nominated by local communities to be assessed as Local Green Space (LGS) by the
Council. The process would include a six week consultation period on the draft
criteria for the assessment of potential LGS sites and a revised Draft Local Green
Space Policy. The suggested approach was triggered by the Executive decision
made on 15 July that a petition to designate Bull Lane allotments as Local Green
Space should be taken into consideration as a formal submission as part of the Local
Plan process.
It was reported that designation of Local Green Space could only be applied through
the plan making process. Should a suggested site already be protected, e.g.
designated as Green Belt, it was unlikely that designation would bring additional
benefits to the site and that it would be taken forward as local green space.
Councillor Michael believed this to be a positive move and one which should be
pursued. However, she also drew Members’ attention to the fact that not all land
would remain protected if very special circumstances were proven for development of a particular site.

Councillor Bosshard was pleased with the introduction of the LGS as a way of protecting green space for local community use. The Executive Committee’s decision in July 2015 that a petition to designate Bull Lane allotments as Local Green Space should be taken into consideration has only just reached the six-week consultation stage; as this would need to be incorporated into the Local Plan, officers were asked if the process could be accelerated.

**RESOLVED that the Executive Committee be recommended to endorse:**

1. the proposed local criteria for assessing potential sites for the Local Green Space designation and the revised Draft Local Green Space Policy for consultation; and
2. the process for inviting local communities to submit sites for consideration as Local Green Space and comment on the revised Draft Local Green Space Policy.

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**Appendix 1k**

**DEVELOPMENT CONTROL COMMITTEE**

**Minutes of the meeting held at 7.30 pm on 11 July 2016**

**BROMLEY’S PROPOSED DRAFT LOCAL PLAN FOR CONSULTATION**

(Page references in these Minutes refer to the DCC agenda unless otherwise stated)

Members were requested to endorse the Draft Local Plan, subject to alterations agreed by the Chief Planner in consultation with the Leader of the Council and finalisation of supporting documents, for a six weeks consultation in compliance with Regulation 19 of the Town and Country Planning Regulations 2012.

The Chairman directed discussion through the sections contained in the Draft Local Plan. The following comments and proposed amendments were made by Members for the purposes set out in the recommendations:-

Chapter 1 - Introduction
Page numbers to be included against each chapter listed on page 61.
Agreed that a general description of areas within the Borough (i.e. suburban, urban, rural) be added to the introduction section.

Chapter 2 – Vision and Objectives
The Chairman referred to the ‘boxed’ text on page 70 (Vision – Bromley 2031) which had been strengthened in regard to the protection and enhancement of conservation areas and heritage assets within the Borough.
Design and the Public Realm (page 72) – It was agreed that a clarified definition such as ‘good quality’ public art be included to avoid any misunderstanding that graffiti may be considered as such.

Chapter 3 - Spatial Strategy
This chapter focused on employment and growth of specified areas such as the economic growth of the Biggin Hill SOLDC, the Cray Business Corridor and changes to Green Belt boundaries in regard to education sites.
It was noted that whilst taking land from the Green Belt to accommodate the expansion of schools was not ideal, some protection would be retained by its reclassification as Urban Open Space or Metropolitan Open Land.

Page 77 - Members voted in favour of this paragraph being amended to read:-

Paragraph 5: ‘The London Plan 2015 imposes the minimum housing target …’

Conformity with the London Plan (page 77) - It was noted that the forecasted increase in employment growth of 13.6% incorporated all methods of employment including home working.

Chapter 4 – Living in Bromley

The Council would provide a minimum of 641 additional homes per annum. The Housing Supply Policy identified and allocated sites for residential development and outlined the timescales involved in delivering schemes. The Greater London Authority was satisfied that Bromley was achieving its housing target.

It was necessary for a predicted number of units to be set against each development scheme as a way of planning how housing targets could be met.

It was suggested that the proposed bus station development at Bromley North could be transferred to nearby sites. The Chief Planner explained that the Bromley North site allowed for a variation in the mix of development however, this should include transport.

Ravensbourne, Plaistow, Sundridge Renewal Area Policy (page 119) – Whilst acknowledging that PTAL ratings were taken from the London Plan, Councillor Turner disagreed with Downham being categorised as an area of deprivation and the statement that transport links were ‘relatively poor’. Grove Park was the nearest Railway Station to Downham and operated services to several London mainline stations. The demographics of the area were changing with some properties now selling at £250k which made this a good area for starter homes. This concern could be addressed by the following revision: ‘Transport links comprise…’

Conversion of Non-Residential Buildings to Residential Policy (page 101) – The Chief Planner explained that this was a broad policy and agreed that the text could be cross-referenced to policies on the retention of industrial units.

Specialist and Older Peoples Accommodation (page 103) – It was acknowledged that the Borough had a large ageing population and that various types of accommodation were available. It was suggested that attempts should be made to prohibit the development of bungalows into housing consisting of two or more storeys to avoid the loss of potential accommodation for elderly people. The Chief Planner explained that in such cases, a substantial amount of evidence would need to be produced to prove that there was a need to retain bungalow accommodation and that it was more likely that the impact on the character of an area would be constraint.

Travellers’ Accommodation (page 106) – Members were informed that Traveller sites were considered and designated as ‘Traveller sites inset within the Green belt’ for GB use; non-GB use would not be acceptable other than for Traveller purposes. The siting of static caravans (which were not considered to be houses), would need to be determined through the planning application process.

Housing Supply (page 86, second paragraph) – concern was raised as to how the housing target of 641 units per annum, provided for the level of need across tenures within the borough. The Chief Planner explained that whilst in isolation, the Bromley housing provision was set at 641 units per annum, the housing provision and needs/requirement was balanced out across London and South East London, as shown in the London Plan.
Backland and Garden Land Development (page 94) – Cross-reference should be added in the supporting text to flood risk assessment and nature conservation policies. Councillor Fawthrop noted that the current Policy H7 stated that exceptions did not apply in Areas of Special Residential Character (ASRCs) however, nothing about this was incorporated in the draft Local Plan Policy. The Chief Planner explained that Garden Land national policy had changed and a strengthened cross-reference to ASRCs could be added.

It was suggested that the supporting text on page 95, paragraph 2 in relation to biodiversity, should be strengthened to protect native habitats by, for example, ensuring that bird and bat boxes were installed when necessary. The Chief Planner explained that emphasis on priority being given to indigenous species and landscaping could be included within the ‘nature conservation’ section however, he would check where a cross-reference to nature conservation policy would be most appropriate.

Travellers’ Accommodation (pages 106-109) - Concern was raised about the recent increase in plots at the Travellers’ site in Layhams Road which only had temporary permission. The boundary of the Star Lane site had been reduced in order to separate the site from the adjacent Green Belt. The application for one plot in Cudham Lane was granted by the High Court on appeal. It was suggested that an informative be added stating that this was designated for personal use only and that any future need would be considered should the pitch be vacated.

Side Space (page 99) – Concern was expressed over possible terracing effects of ground floor (single storey) development. The Chief Planner noted that it was possible to address this concern through the policy on ‘Residential Extensions’ (page 98) as this referred to space or gaps between buildings including single storey extensions. However, the Side Space policy X (page 99) was concerned with two-storey developments.

Accommodation for Family Members (page 99) - The Chief Planner agreed to strengthen the text to emphasise that any additional accommodation i.e. granny annexes must have access to the main dwelling house and be ancillary to it.

Provision of Affordable Housing (page 88) – This Policy reflected what was outlined in the National Planning Policy Framework (NPPF).

Chapter 5 - Supporting Communities

Education (page 130) – The Kentwood Site had been added to the list of designated sites for educational use. As a number of the courses were a vital requirement within this part of the Borough, it was requested that the current Adult Education Centre be relocated as close as possible to its original site.

The deletion of the allocation for secondary education at Balmoral Avenue was queried, particularly noting the potential time implications for other sites such as Kentwood coming forward and the potential for school sites to drop out. The Committee was advised that consideration was given to the recommendation of the Advisory Panel, notably in respect of the number of schools in close proximity. A vote to reallocate the site at Balmoral Avenue for education use fell.

It was agreed that the Education Policy (page 147) should place emphasis on schools expanding upwards in order to conserve Green Belt/MOL land and recreation areas.

Valued Local Community Assets (page 124) – The Chairman emphasised the importance of public houses within local communities and considered the six months marketing period to be insufficient time. It was noted that empty buildings such as these were often inhabited by squatters and the eviction process was a long and
difficult one. The six month period was retained following the fall of a vote at 7-8 to extend this to 12 months.

Social Infrastructure (page 122) – One Member requested that emphasis be placed on new developments incorporating appropriate convenience stores; social and community services. The Chief Planner agreed that the words ‘other facilities’ be included in this text.

Burial Space (page 151) – It was suggested that reference be made to reflect the safeguarding of plots for private burials.

Chapter 6 – Getting Around

Members were generally satisfied with the Cross-over Policy.

Access for All (pages 160/161) – The final sentence of the second paragraph of the supporting text was amended to read: ‘Contributions towards the Mayoral cycle route programmes may be sought’.

Chapter 7 – Bromley’s Valued Environments

Visiting Member Councillor Mellor considered the predicted number of units required (300-400) within the Copers Cope area was too high and he requested a reduction of these figures.

Areas of Special Residential Character (page 191) – Councillor Mellor also requested that the boundary of the existing Copers Cope ASRC be increased up to the edge of the Conservation Area in order to protect the piece of land between the two. Following a vote, Members agreed to retain the current Copers Cope ASRC boundary.

Reintroduction of ASRC development guidelines from the 2006 UDP Appendix 1.2 was proposed to strengthen guidance.

Councillor Fawthrop referred to the description of the Petts Wood ASRC which had been amended without reference to the three Ward Members. The Chief Planner agreed to discuss the amended description with officers and Ward Members. The amended description could then be inserted (page 7 of the supplementary agenda).

Chapter 8 – Working in Bromley

It was suggested that the boundary of South Camp at Biggin Hill Airport be reduced. However, Members were informed that the Airport already possessed PDRs and that the release of GB land was for business development. Requests for the release of further GB land was being independently assessed. The issue of an Article 4 Direction restricting the use of PDRs was suggested but it was noted that this could be at odds with the Strategic Outer London Development Centre designations. It was considered beneficial to small businesses if companies could be persuaded to sub-divide their offices into small business suites or to consider leasing small areas of larger offices. This could often be completed without the need for a separate planning permission.

Chapter 9 – Environmental Challenges

Whilst happy to note the Noise Pollution Policy, Councillor Fawthrop also alluded to light pollution which impacted on the landscape and nature conservation such as bats and other small species of mammal. He requested that a revision to the light pollution policy be included in the draft Local Plan (page 257).

Chapter 10 – Delivery and Implementation

No comments.

RESOLVED that subject to the amendments agreed above, the Draft Bromley Local Plan document be endorsed and referred to the Executive to agree, subject to the Chief Planner, in consultation with the Leader of the Council,
being authorised to make alterations to the Draft Local Plan and finalise supporting documents as required, prior to its publication.

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Appendix 1

DEVELOPMENT CONTROL COMMITTEE
Minutes of the meeting held at 7.30 pm on 12 June 2017

SUBMISSION OF BROMLEY’S DRAFT LOCAL PLAN
Report DRR17/026

Members were requested to endorse the Council’s Proposed Submission Draft Local Plan, together with the Policy Map Sets (Appendix A) and a Schedule of Proposed Minor Modifications (Appendix B).

Formal consultation on the proposed Submission Draft Local Plan was undertaken in November/December 2016.

Responses to the consultation were summarised in Appendix C of the report. In the event that the Proposed Submission Draft Local Plan was adopted by Full Council, the document would be submitted to the Secretary of State for inspection. A response could be expected approximately 10 months following submission. The Chief Planner confirmed to Councillor Buttinger that reference had been made in the Proposed Submission Draft Local Plan to landscaping and the protection of native plants and hedgerows and advised that supplementary guidance could be formulated.

Referring to page 525 of the Proposed Submission Draft Local Plan – Changes to Metropolitan Land, Green Chain and Urban Open Space Designations, Councillor Mellor was disappointed to note the deletion of MOL/GC designations for sites 13, 14 and 15 located within his Ward as he had previously requested they be retained. He considered deletion of these designations would result in a loss of valuable land. The Head of Planning Strategy, Renewal and Recreation reported that only the areas which had already been developed were taken out of the Metropolitan Open Land designation within the Proposed Submission Draft Local Plan and the undeveloped land retained the designation. It was confirmed to Councillor Mellor that deletion of a designation referred solely to the developed land within a defined area. Councillor Brooks was informed that whilst the designation of UOS allocated to the area around Winsford Gardens, Croydon Road, Penge would be deleted, the gardens themselves would still retain the UOS designation.

Referring to Views of Local Importance (page 458), Councillor Buttinger requested whether a specific view from Norsted Lane, Pratts Bottom, had been considered as a VLI in order to protect and retain the view across the city of London which could be seen from this site. The Head of Planning Strategy confirmed that whilst this area had been reviewed, at the present time, incorporating the site into the document would result in a material amendment which would significantly delay the adoption of
the Proposed Submission Draft Local Plan. A policy did exist however, which protected sites such as this one. (Subsequent to the meeting Councillor Buttinger was informed that this was Draft Policy 37.)

The Chief Planner confirmed that the list of housing sites would be updated periodically when the 5 year housing land supply was reviewed. The Council sought provision of 35% affordable homes on developments providing 11 or more residential units. Where an application proposed a level below this threshold, a viability assessment would be required which would be scrutinised by an independent person.

It was noted that the intermediate housing income threshold outlined on page 49 of the report (paragraph 2.1.35), was already two years old. The Chief Planner confirmed that this information would be updated every three years and was included in the schedule of minor modifications.

The Chairman put the recommendation in the report to the meeting and it was unanimously agreed that:

1 the summary of representations (Appendix C) and the suggested minor modifications (Appendix B) in response to the Regulation 19 consultation on the Proposed Submission Draft Local Plan (Appendix A), be noted;
2 Members of the Executive be recommended to agree the following documents as the main submission documents which will form the Bromley Local Plan:-
   a) Proposed Submission Draft Local Plan (November 2016) (Appendix A – part 1);
   b) Policy Map Sets (November 2016) (Appendix A – parts 2 and 3);
   c) Bromley Local Plan – Schedule of Proposed Minor Modifications (June 2017) (Appendix B); and
3) Members of the Executive be recommended to delegate authority to the Chief Planner, in consultation with the Leader of the Council, to approve the preparation of necessary further information and amendments to the Bromley Local Plan Proposed Submission Draft Local Plan:-
   a) prior to, or soon after, submission of the Bromley Local Plan to the Secretary of State for Communities and Local Government for Independent Examination, including the Regulation 22 documents; and
   b) during the public examination in response to, for example, unexpected national policy changes.

Appendix 1m

Executive
Minutes of the meeting held at 7pm on 20 June 2017

SUBMISSION OF BROMLEY'S DRAFT LOCAL PLAN
Report DRR17/026
The Council was required to have an up to date Local Plan and submission of the Draft Local Plan formed the final stage of the preparation with the Inspector appointed by the Secretary of State leading the examination process after submission. By submitting the Local Plan the Council would make significant progress towards meeting the Government’s requirement to have an up to date Local Plan.

The formal consultation on the Proposed Submission Draft Local Plan (PSDLP) was undertaken in November/December 2016. The responses to the consultation were summarised in Appendix C. This consultation was undertaken under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on the PSDLP as agreed by the Executive in 2016.

The Portfolio Holder for Renewal and Recreation summarised the issues that had arisen through formal consultation, and confirmed that it was not possible to make significant changes to the Plan at this stage without having to conduct a further formal public consultation. Meanwhile, developers could submit planning applications in the normal way. Should the Inspector require changes in the Plan, possibly in response to changes in national or regional policy or targets, the Council could seek to make the appropriate modifications, and the Council would retain the final decision on adopting the Plan.

It was confirmed that although officers represented the Council at public examination, the inspector led the examination and it might be possible for Members to attend and speak.

The report had already been considered and endorsed by Development Control Committee on 12th June 2017. The Executive agreed that the Draft Local Plan (Appendix A) accompanied by the required supporting documents and the schedule of suggested minor modifications (Appendix B) should be referred to Council to approve its submission to the Secretary of State for Communities and Local Government for Independent Examination.

The Portfolio Holder for Renewal and Recreation led Members in thanking the officers, Mary Manuel and her team, for their hard work in preparing the Plan for submission.

RESOLVED that
1. It is agreed that the Draft Local Plan (Appendix A) forms the plan for Submission to the Secretary of State, and is accompanied by the Schedule of Suggested Minor Modifications (Appendix B) and the relevant supporting, background and technical documents.
2. The Draft Local Plan be referred to Full Council for approval for Submission to the Secretary of State for Communities and Local Government for Independent Examination.
3. Authority be delegated to the Chief Planner in consultation with the Leader of the Council to approve the preparation of necessary further information and amendments to the Bromley Local Plan Proposed Submission Draft Local Plan: (i) prior to or soon after submission of the Bromley Local Plan to the Secretary of State for Communities and Local Government for
Independent Examination including the Regulation 22 documents and (ii) during the public examination in response to for example, unexpected national policy changes.

Appendix 1n

Full Council
Minutes of the meeting held at 7pm on 26th June 2017

SUBMISSION OF BROMLEY’S DRAFT LOCAL PLAN
Report DRR17/026

A motion to approve the Draft Local Plan for submission to the Secretary of State for Communities and Local Government for Independent Examination was moved by Councillor Peter Morgan, seconded by Councillor Alexa Michael and CARRIED.
## Appendix 2

### Engagement with / relating to Travellers

<table>
<thead>
<tr>
<th>Date</th>
<th>Sites</th>
<th>Contacts</th>
<th>Nature of Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>Various (including bricks &amp; mortar)</td>
<td>GLA, consultants and London wide invitees (inc Bromley “supporting people” contact)</td>
<td>Develop Londonwide 2008 Gypsy and Traveller Accommodation Needs Assessment (GTANA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Fieldwork interviewers (Fordham)</td>
<td>GTANA survey interviews</td>
</tr>
<tr>
<td>March 2008</td>
<td>Londonwide 2008 Gypsy and Traveller Accommodation Needs Assessment (GTANA)</td>
<td>Chairman of the Guild (at the time) &amp; legal representative</td>
<td>Meeting to discuss site expansion</td>
</tr>
<tr>
<td>May 2009</td>
<td>Keston Travelling Showmans Ground</td>
<td>GLA and Traveller groups</td>
<td>Significant input re London Plan Development &amp; Examination in Public appearance</td>
</tr>
<tr>
<td>2009 - 2011</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>Various</td>
<td>Gypsy Traveller Project, Friends, Families &amp; Travellers (FFT)</td>
<td>Responses to the CSID</td>
</tr>
<tr>
<td></td>
<td></td>
<td>London Gypsy Traveller Unit, Traveller Families</td>
<td>Telephone discussions explaining the Local Planning process</td>
</tr>
<tr>
<td>Sept 2011</td>
<td>Council sites &amp; settled community in St Mary Cray</td>
<td>Gypsy Traveller Project Workers (2) and Traveller rep</td>
<td>Explain the Plan process &amp; seek response to the Core Strategy Issues Document (CSID)</td>
</tr>
<tr>
<td>Jan 2012</td>
<td>Star Lane</td>
<td>Travellers on site</td>
<td>Met with LA site manager and travellers to discuss site issues</td>
</tr>
<tr>
<td></td>
<td>Old Maidstone Road</td>
<td>Travellers on site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Saltbox Hill</td>
<td>Traveller family &amp; support worker</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Chalkpit site</td>
<td>Family member</td>
<td>Confirmed the site was unoccupied.</td>
</tr>
<tr>
<td></td>
<td>Unauthorised sites</td>
<td></td>
<td>Site visits with LA site manager</td>
</tr>
<tr>
<td>7th Feb 2012</td>
<td>John Wilson (Police Traveller Liaison)</td>
<td></td>
<td>Meeting to discuss Local Plan</td>
</tr>
<tr>
<td>2012</td>
<td>148 Croydon Rd, (various)</td>
<td>Traveller family and Planning advisor</td>
<td>Planning Appeal – discussion appellant regarding personal need and the wider Borough need inc. site visits</td>
</tr>
<tr>
<td></td>
<td>Star Lane</td>
<td>Traveller planning advisor</td>
<td></td>
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<tr>
<td></td>
<td>Old Maidstone Road</td>
<td>Traveller planning advisor</td>
<td></td>
</tr>
<tr>
<td>28th June 2012</td>
<td>Options for travellers (methodology &amp; sites)</td>
<td>Development Control Committee</td>
<td>Report</td>
</tr>
<tr>
<td>Sept 2012</td>
<td>Bexley</td>
<td>London Borough of</td>
<td>Duty to Co-operate – Bexley</td>
</tr>
<tr>
<td>Date</td>
<td>Location</td>
<td>Actor</td>
<td>Description</td>
</tr>
<tr>
<td>------------</td>
<td>---------------------------------</td>
<td>----------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>20th Dec 2012</td>
<td>Chalkpit</td>
<td>Owner</td>
<td>Met to explain Options for Chalkpit site</td>
</tr>
<tr>
<td>2012 / 2013</td>
<td>Archies Stables, LBB</td>
<td></td>
<td>Case in the High Court &amp; Court of Appeal</td>
</tr>
<tr>
<td>Nov 2012 / Jan 2013</td>
<td>Adj Keston Travelling Showmans Ground</td>
<td>Travelling Showman</td>
<td>Discussion of site (refused &amp; dismissed) and his families needs. Added to database</td>
</tr>
<tr>
<td>Jan 2013</td>
<td>Sites in the Options Paper (not Archies Stables)</td>
<td>Traveller families</td>
<td>Letters re Options Consultation - insets within the Green Belt as Traveller sites only</td>
</tr>
<tr>
<td>Jan 2013</td>
<td>Mead View Travellers</td>
<td></td>
<td>Telephone discussions about Options Consultation</td>
</tr>
<tr>
<td>22nd Jan 2013</td>
<td>Sites &amp; need in SE London</td>
<td>SE London Councils Gypsy &amp; Traveller Partnership Group Lewisham, Greenwich, Southwark, Bexley, Lambeth</td>
<td>Duty to Co-operate discussions</td>
</tr>
<tr>
<td>Jan 2013</td>
<td>Keston Mobile Park Mead Green Millies View St Josephs Place Traveller neighbour (supporter)</td>
<td>Travellers</td>
<td>Meetings outlining the Options Consultation</td>
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Appendix 3

July 2016 - Summary of Responses to Regulation 18 consultations:

Bromley Draft Policies and Designations (2014)
Local Green Space Policy and Criteria for Designation (2016)

July 2016 - Summary of Regulation 18 Consultation Responses.pdf

June 2017 - Summary of Responses to Regulation 19 consultation:

Bromley Proposed Submission Draft Local Plan Consultation (2016)

June 2017 - Summary of Responses PDF1.pdf
Contents
Section 1 – Introduction
Section 2 (part) - Living in Bromley – including Housing Policy 1 and proposed housing and mixed use site allocations (Appendix 10.2).

June 2017 - Summary of Responses PDF2.pdf
Contents
Section 2 – Living in Bromley (continued from PDF 1) including Travellers and Renewal Areas
Section 3 – Supporting Communities incorporating Social infrastructure, Health and wellbeing, Education and proposed education site allocations (Appendix 10.4)
Section 4 Getting Around

June 2017 - Summary of Responses PDF3.pdf
Contents
Section 5 Valued Environments, incorporating Built Heritage, Open and natural space, and proposed Local Green Space Sites (Appendix 10.8) and Nature conservation and development

June 2017 - Summary of Responses PDF4.pdf
Contents
Section 6 – Working in Bromley, incorporating Business and employment, proposed Office Clusters (Appendix 10.14), Town Centres, Town Centre Shopping Frontages (Appendix 10.9), Biggin Hill SOLDC and related Green Belt changes (Appendix 10.10) and Crystal Palace SOLDC
Section 7 Environmental challenges, incorporating Waste Site Allocations (Appendix 10.11)
Section 8 - Delivery and Implementation
Section 9 – Glossary
Appendix 10.12 Implementation and Monitoring Framework
Policies Map Sets 51
Appendix 4

Consultation Approaches

Consultees

Focussed mail consultation letter relating to Specific Sites

Paper Consultation Response Forms

Newspaper Wraparound

‘Update’, Summer 2015


West Beckenham Residents’ Association: The Official Website (2016) featuring Bromley Local Plan Flyer

Councillors Websites – Penge and Cator

Bromley Times Newspaper,

Biggin Hill Today Newspaper,

New from Crystal Palace Website
Consultees

The contacts listed below include, agents, businesses, stakeholders and interest groups, London boroughs, district and parish councils, housing associations, residents associations, educational stakeholders, sports clubs and organisations.

Additionally over 1,000 individual consultees are registered on the data base and over 3,000 letters were sent to addresses within 100m of individual allocations (some of which subsequently registered on the database – note potential double counting)

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G Weeks and Sons Ltd
Gas Appliances
GlaxoSmithKline UK Ltd
Graduates (School)
Graham Webb
Greggs Bakery
H.S.B.C.
Haart/Woolwich
Halifax
Holland and Barrett
Howard New Aircraft and General Cleaning Services
Iceland
Iceni Projects Ltd
IKEA
J Sainsbury PLC
J.T.L. Engineering and Building Recruitment and Training
JETS Biggin Hill Ltd
Jon's Barber Shop
Joseph Samuel Corporation
K.F.C.
Kebab House
Kentucky Fried Chicken (Great Britain) Limited
Kinetika
King Palace
Kingsley-Smith & Co
Koi Water Farm
KSG Appointments Ltd
Langford Walker
Launderette
Legal and General Assurance Society Ltd
LIDL UK GmbH
Limes Leisure Investments LLP
Linay and Shipp - Residential
Linays Commercial
Lloyds TSB Bank
Locksbottom Business Association
Loog Bua
M F Jacks
Mackays
Majestic Catering
Manak and Whiting
Markoss Aviation Ltd
Marks and Spencers
Marshells
McDonalds
Metrobus Ltd.
Mirage
Moldflow Europe
Mottingham Village Traders Group
Muirhead Aerospace
Nationwide
NatWest Bank
Naz Balti
New Look
New World Noodle House
NEXT
Noble Garden
Olive Tree
Orchard House Dental Practice
Oorpington Car Stereos
Oryx Jet
OX Group UK
Oxfam
Partners
Pat's Textiles
PDSA
Peacocks
Penge Auto Sprays
Petallica Ltd
Pine Rooms
Pizza Express
PlanInfo
Pound Stretcher
Priory Pharmacy
PTA Ltd.
Pumfrey and Lythaby Solicitors
Quantel Ltd
Quicksilver Amusements Arcade
R & S Builders
Reid's Music Store
Relta Limited
Richard Babington
Rizon Jet UK
Robert Dyas - Ironmonger
Robinson, Griffiths and Jackson
Royal London Mutual Insurance Society Ltd
Ruth Brushett
Sainsbury
Save the Children
Savers Toiletries and Healthcare
Scope
Scotts Pie and Mash
SEM Ltd
Shipping & Airlines
Shoe Zone
Shoregate Consulting Ltd
Shurgard Storage Centres UK Ltd
Somerfield Stores
South East London Chamber of Commerce
Spice Mela
Stead and Simpson
Superdrug
Surrey & Kent Flying Club
Sutton Windows
Swinton Insurance
T.G. Baynes & Sons
Tan Express
Taste Temptation
Tattoo and Body Piercing
Telereal Trillium
Tesco Stores Ltd
The Bickley Manor Hotel
The Co-operative Estates
The Co-operative Group
The Fragrance Shop
The Harvest Moon
The Milton Group
The Rookeny Estates Company
The Walnuts Shopping Centre
The White Hart
The Works
Thomas Collison
Thomas Cook
Thomas Dunton & Co.
Thornburrows
Tone Clothing
Total Recall
Transcity Exhibitions Ltd.
Tudorcroft Ltd
Valley Tree Surgeons
Vendair
Vero Italian Restaurant
VTB Mobility Ltd
W.H. Smith
W.J. King (Bromley) Vauxhall
Waitrose
Waldrons
Wellers Solicitors
WH Smith
Whelan Farms Ltd.
Whitbread Property
Whitehouse Renault Orpington
Whitmores (Chislehurst) Vauxhall
Wilkins Kennedy
Wilkinson - Hardware
Wilkinsonos
William Nash Ltd
WM Morrison Supermarkets Plc
Wright (Properties) Ltd and Waitrose Ltd
Xian Restaurant
Yoe Bo Chinese Restaurant
Your Move

**Stakeholders / Interest Groups**

Acert (Advisory Council for the Education of Romany and other Travellers)
& Foxbury Wood
Advisory Panel on Conservation Areas & The Beckenham Civic Society
Age UK Bromley & Greenwich
Air Transport Users Council
Airport Operators Association
Albyfield and Hurstwood Drive
Neighbourhood Watch
All Saints Church
All Souls' Church, Pratts Bottom
Ancient Monuments Society
Anerley Methodist Church
APCA Core Panel
Association of Circus Proprietors
Avenue Baptist Church
Bat Conservation Trust
Battle of Britain Fighter Association
Beaverwood Lodge S & L Club
Becckenham & Penge Citizen's Advice Bureau
Becckenham Baptist Church
Becckenham Labour Party Women's Section
Becckenham Liberal Democrats
Becckenham Methodist Church (Bromley Rd)
Becckenham United Reformed Church
Belmont Mission/Jubilee Church & Community Centre
Biggin Hill Airport Consultative Committee
Biggin Hill Airport Ltd
Blackbrook Lane Plot Owners
British Geological Survey
British Romany Union
Bromley & Chislehurst Conservative Association.
Bromley & Chislehurst Labour Party
Bromley & District Estate Agents Association
Bromley Allotment & Leisure Gardens Federation
Bromley Ambulance Service
Bromley and West Kent Archaeological Group
Bromley Asian Cultural Association
Bromley Baptist Church
Bromley Biodiversity Partnership
Bromley Borough Local History Society
Bromley Borough Roads Action Group
Bromley Bridleways Access Group
Bromley CAMRA
Bromley Christian Centre
Bromley Civic Society
Bromley Civic Society & The Friends of Bromley Town Parks & Gardens
Bromley Common Allotment Association's Bromley Common Methodist Church
Bromley Congregation Of Jehovahs
Bromley Council on Ageing
Bromley Friends Forum
Bromley Friends of the Earth
Bromley Gypsy/Traveller Project
Bromley Healthcare
Bromley High Street (North) Traders
Bromley Hospitals Patient & Public Involvement Forum
Bromley Humanists
Bromley Labour Party Local Government Committee
Bromley Mental Health Forum
Bromley Mind
Bromley Mobility Forum
Bromley Museum
Bromley Mytime
Bromley North Traders Association
Bromley Parish (St Peter & St Paul)
Bromley Racial Equality Council
Bromley Ramblers
Bromley Reform Synagogue
Bromley Somali Community Association
Bromley Sparks
Bromley Talking Newspapers
Bromley Town Church
Bromley United Reformed Church
Bromley Wheelchair User Group
Bromley Youth Council
Brook Lane Community Church
BT Group plc
Bull Lane Action Group
Campaign for Real Ale
Central Beckenham Liberal Democrats
Central Bedfordshire Council, Mineral and Waste Planning Shared Service
Chelsfield Methodist Church
Children & Families Voluntary Sector Forum
Chislehurst Methodist Church
Christ Church Beckenham
Christ Church, Bromley
Christ Church, Chislehurst
Christ Church, Penge
Christ Church, Petts Wood
Christ Lutheran Church
Christian Outreach Centre London (South-East)
Church of God
Church of The Annunciation
Churches Together in Bromley
Churches Together in Orpington
Churchill Retirement Living
Churchill Theatre Bromley
Citygate Church
Clock House Methodist Church
Community Care Protection Group
Community Links Bromley
Community Options
Coney Hill Baptist Church
Confederation of British Industry
Connex Transport UK
Cornerstone Christian Centre
Council for British Archaeology
Council for the Protection of Rural England
Country Land & Business Association
Countryside Conservators Panel
CRA20TEN
Cray Festival
Cray Village Community Forum (CVCF)
Cray Wanderers Football Club
Crays Business Challenge
Crockthorn & Orpington Trust
Crystal Palace Campaign
Crystal Palace Football Club
Crystal Palace Sports Partnership (CPSP)
Crystal Palace Triangle Planning Group
Cudham Village Club
Department for Children, Schools and Families
Department for Constitutional Affairs
Department for Culture Media & Sport
Department for Environment, Food & Rural Affairs
Department for Transport
Department for Transport, Airports Policy Division
DH Estates & Facilities
Diocese of Rochester
Disability Consultative Group
Disability Voice Bromley
Disabled Living Foundation
Downe Baptist Church
East Street Evangelical Church
East Surrey Badger Protection Society
EDF Energy
Education Funding Agency
Elmers End Free Church
Elmstead Baptist Church
Emmanuel URC Church
Empty Homes Agency
English Golf Union
English Heritage - London Region
Environment Agency
Environment Agency, Thames Region - South East Area
Equality and Human Rights Commission
Ethnic Communities Programme
Experts by Experience
Fairmount Residential Home
Fairworth Bromley Trust
Fairworth Educational Centre
Federation of Members Sporting Clubs
(Bromley)
Fields in Trust
First Trust
Flightpath
Forestry Commission
Friends of Alexandra Recreation Ground
Friends of Biggin Hill Parks
Friends of Cator Park
Friends of Chislehurst and Walden
Friends of Chislehurst Commons
Friends of Coney Hall Recreation Ground
Friends of Croydon Road Recreation Ground
Friends of Crystal Palace Park
Friends of Darrick Wood
Friends of Edgebury Open Space
Friends of Glentrammon Recreation Ground
Friends of Harvington Estate
Friends of Havelock Recreation Ground
Friends of Hayes Common
Friends of Hayes Parks
Friends of High Broom Wood
Friends of Hoblingwell Wood
Friends of Hoblingwell Wood
Friends of Hillydale Open Space
Friends of Jubilee Country Park
Friends of Kelsey Park
Friends of Meadside Open Space
Friends of Mottingham Woods
Friends of Penge Parks
Friends of Penge Rec
Friends of Pickhurst Rec & Green
Friends of Poverest Park
Friends of Priory Gardens
Friends of Richmal Crompton Fields
Friends of Royston Field
Friends of Scadbury Park
Friends of South Hill Woods and Kingswood Glen
Friends of St. George’s Churchyard
Friends of the Earth (London Region)
Friends of the Earth Southwark
Friends of the Great North Wood
Friends of Tugmutton Common
Friends of Warren Road
Friends of Well Wood
Friends of Whitehall Recreation Ground
Friends of Willett Recreation Ground
Friends of Winsford Gardens
Friends, Family and Travellers
Good Shepherd Old RC Church
Greater Grace Christian Church - Wickham Halls
Greater London Authority
Greater London Authority (Member)
Greater London South County Scout Council
Green Chain Working Party
Green Street Green Baptist Church
Greenpeace - Bromley
H M Courts Service
Hayes Free Church
Hayes Lane Baptist Church
Hayes Parish Church
Healthwatch Bromley
Highways England
Historic England
Historic England
Holy Innocents Church
Holy Trinity Church
Home Builders Federation Ltd
Homes & Communities Agency
Hope Church
Irish Travellers Movement in Britain
Jubilee Church
Kent Archaeological Rescue Unit
Kent Association for the Blind
Kent Bat Group
Kent Downs AONB
Kent Wildlife Trust
Keston Parish Church
KICC The Open Door
King’s Church
Landmark Information Group
Legal and General Investment Management
Living Streets
Local History Society for the London Borough of Bromley
London Central/London General
London City Airport
London Cycling Campaign
London Development Agency, Design, Development & Environment Team
London Fire & Emergency Planning Authority, Southern Command
London Fire and Emergency Planning Authority
London Fire Brigade
London First Group
London Gypsy and Traveller Unit
London Parks & Gardens Trust
London Travel Watch
London Walking Forum
London Wildlife Trust
Made in London
Southern Gas Networks
Spiritual Progress Centre
Sport England
Sport England, London Region
St. Andrew's Church
St. Anthony Church
St. Augustine's Church
St. Barnabas Church
St. Edmund of Canterbury
St. Edward the Confessor
St. Francis Church
St. Francis of Assisi
St. George's Church
St. Giles Church
St. Giles The Abbot & St Nicholas Church
St. James' Church
St. James the Great Church
St. John the Evangelist
St. John's Church
St. John's United Reform Church
St. Joseph's Roman Catholic Church
St. Lukes Church
St. Mark's (C of E) Church
St. Marks Church
St. Mark's Parish Church
St. Martin of Tours Church
St. Mary Cray Community Forum
St. Mary the Virgin Church
St. Mary's Church
St. Mary's Church Bromley
St. Mary's Church, St Mary Cray
St. Mary's of Nazareth
St. Mary's Parish Church
St. Michael & All Angels Church
St. Nicholas Church
St. Patricks Church
St. Paul's Church
St. Paul's Cray United Reform Church
St. Peter's Hall
St. Swithun's Church
St. Theresa's Church
Stagecoach Selkent
Stepping Stones Club
SUSTRANS
Sydenham Society
Temple United Reform Church
Thames Water Property Services
The AA Motoring Trust
The Alliance of British Drivers, London Region
The Architect's Panel
The Association of Independent Showmen
The Camden Society
The Church Commissioners
The Coal Authority
The Crown Estate Commissioners
The Crystal Palace Foundation
The Design Council Cabe
The Diocese of Southwark
The Dulwich Society
The Friends of Bromley Town Parks & Gardens
The Garden Centre Group
The Georgian Group
The Girl Guide Association
The Gypsy Council
The Gypsy Council (GCECWCW)
The Hall (church)
The Lambethans' Society
The Lawn Tennis Association
The London Forum of Amenity and Civic Societies
The London Green Belt Council
The National Trust London and the South East Region
The Norwood Society
The Open Spaces Society
The Parish Church of St. Mark, Bromley
The Ridge Wildlife Society
The Salvation Army
The Salvation Army, Penge Corps
The Scout Association
The Society for the Protection of Ancient Buildings
The Tree Council
The Twentieth Century Society
The United Benefice of Cudham & Downe
The Victorian Society
Theatres Trust
Threshers Day Nursery
T-Mobile (UK) Ltd.
Transco, South East Ldz
Transport for London
Traveller Law Reform Project
Trust for London
Trustees of Chislehurst Commons Unit (HUDU)
University of Westminster
Upper Norwood Association for Community Care
Vodaphone Limited
Walnuts Leisure Centre
Walnuts Shopping Centre
West Beckenham Conservative Club Ltd
West Kent Badger Group
West Wickham Field Club
West Wickham Methodist Church
West Wickham Spiritualist Church
Witnesses
Women's Design Service
Woodland Trust
Working Families
Workspace Group Plc

**London Boroughs**

Royal Borough of Greenwich
City of London Corporation, The Commons
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
Royal Borough of Greenwich
London Borough of Hammersmith & Fulham
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Islington
Royal Borough of Kensington and Chelsea
Royal Borough of Kingston-Upon-Thames
London Borough of Lambeth
London Borough of Lewisham
London Borough of Newham
London Borough of Redbridge
London Borough of Richmond-Upon-Thames
London Borough of Southwark
London Borough of Southwark
London Borough of Southwark
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
Westminster City Council

**District and Parish Councils**

Brasted Parish Council
Chelsfield & Farleigh Parish Council
Crockenhill Parish Council
Dartford District Council
Halstead Parish Council
Kent County Council
Knickholt Parish Council
Sevenoaks District Council
Shoreham Parish Council
Surrey County Council
Surrey County Council

Tandridge District Council
Tatsfield Parish Council
Tilsey Parish Council
Westerham Town Council
Woldingham Parish Council

**Housing Associations**

A2Dominion Group
Abbeyfield (Beckenham) Society Ltd.
Abbeyfield (Bromley) Society Ltd.
Abbeyfield (Orpington) Society Ltd.
Affinity Sutton
Affinity Sutton Group
Anchor Housing Association
Anerley Housing Co-operative Ltd.
Broomleigh Housing Association
Chislehurst & Sidcup Housing Association
Clarion Housing Group
Family Mosaic
Glebe Housing Association Ltd.
Hexagon Housing Association
Hyde Housing Association
Kenistone Housing Association
L&Q Beaver Homes
L&Q Group
Methodist Homes (MHA)
Moat Homes Ltd
Penning Churches Housing Association Ltd.
Presentation Housing Association Limited
Radcliffe Housing Society Ltd
Riverbirds Housing Association
Riverside Group
Sanctuary Housing Association
Town & Country Housing Group
Viridian Housing
Wandle Housing Association
Warden Housing Association

**Residents Associations**

Chelsfield Village Society
Aldersmead Road Residents’ Association
Alexandra Residents’ Association
Andace Park Residents’ Association
Anerley Association
Aperfield Green Belt Action Group
Avington Grove Residents Association
Babbacombe Road Residents Association
Badgers Mount Residents’ Association
Barnmead Residents’ Association
Beadgers Road Residents’ Association
Beckenham Place Park Residents' Association
Beckenham Society
Penge Forum
Penge Forum
Petts Wood & District Residents' Association
Place Farm & Sparrows Drive Estates Residents' Association
Pratts Bottom Residents' Association
Queen Adelaide Court Tenants & Residents' Association
Ravensbourne Valley Preservation Society
Restovan Park Residents' Association
Rowan Park Residents' Association
Royston Estate Residents' Association
SCOTRA
Shortlands Residents' Association
South Penge Park Residents' Association
Spring Park Residents' Association
St. Mary Cray Action Group
St. Paul's Cray Community Association
St. Paul's Cray Residents' Association
St. Paul's Cray Tenants & Residents' Association
Stirling Drive Residents' Association
Sundridge Park Preservation Society
Sundridge Residents' Association
The Chislehurst Society
The Federation of Private Residents' Associations
The Gardens Residents' Association
The Grove Park Community Group
The Groves Residents' Association
The Hayes (Kent) Community Council
The Quinton Close Residents' Association
The Ravensbourne Residents' Association
The Riverbirds Residents' Association
Turpington Community Association
Vale Road Residents' Association
Vinson Close Residents' Association
Well Hill Residents' Association
West Beckenham RA
West Beckenham Residents' Association
West Wickham Residents' Association
Wickham Common Residents' Association
Windsor Drive Community Association
Woodlands Valley Residents' Association
Yester Park Residents Association

Educational Stakeholders

Alexandra Primary School
Ashgrove School
Babington House
Balgowan Primary School
Bickley Park School
Bickley Primary School
Biggin Hill Primary School
Bishop Challoner School
Bishop Justus C of E Secondary School
Blenheim Primary School
Breaside Preparatory School
Bromley Asian Cultural Association
Bromley College of Further and Higher Education
Bromley Gypsy/Traveller Project
Bromley High School GDST
Bromley Road Infant School
Bullers Wood School for Girls
Burnt Ash Primary School
Burwood School
Castlecombe Primary School
Charles Darwin School
Chelsfield Primary School
Chislehurst (St. Nicholas) Primary School
Churchfields Primary School
Clare House Primary School
Coopers Technology College
Crofton Infant School
Crofton Junior School
Cudham C of E Primary School
Darrick Wood Infant School
Darrick Wood Junior School
Darrick Wood School
Darul Uloom London Islamic School
Dorset Road Infant School
Downe Primary School
Edgebury Primary
Edgebury Primary School
Eltham College
Ethnic Communities Programme
Farnborough Primary School
Farringtons School
FFT Planning
Glebe School
Grays Farm Primary School
Green Street Green Primary School
Harris Academy Beckenham
Harris Academy Bromley
Harris Primary Academy Kent House
Harris Primary Academy Orpington
Hawes Down Infant School
Hawes Down Junior School
Hayes Primary School
Hayes School
Highfield Infant School
Highfield Junior School
Holy Innocents Primary School
Irish Travellers Movement in Britain
James Dixon Primary School
James Dixon Primary School
Kemnal Technology College
Keston Church of England Primary School
Langley Park Girls School
Langley Park School for Boys
Leesons Primary School
Malcolm Primary School
Manor Oak Primary School
Marian Vian Primary School
Marjorie McClure School
Mead Road School
Midfield Primary School
Mottingham Primary School
Newstead Woods School for Girls
Oak Lodge Primary School
Oaklands Junior School
Parish Church of England Primary School
Perry Hall Primary School
Pickhurst Infant School
Pickhurst Junior School
Poverest Primary School & Adult Education Centre
Pratts Bottom Primary School
Princes Plain Primary School
Pupil Referral Unit
Raglan Primary School
Ravens Wood School
Ravensbourne School
Rectory Paddock School
Redhill Primary School
Riverside School
Scotts Park Primary School
Somali Well Women Project
Southborough Primary School
St. Anthony’s Roman Catholic Primary School
St. Christopher’s The Hall School
St. Davids College
St. George’s, Bickley, Church of England Primary School
St. James’ Roman Catholic Primary School
St. John’s Church of England Primary School
St. Joseph’s Roman Catholic Primary School
St. Mark’s Church of England Primary School
St. Mary’s Catholic Primary School, Beckenham
St. Mary’s Cray Primary School
St. Olave’s & St Saviour’s Grammar School
St. Paul’s Cray Church of England Primary School
St. Peter & St. Paul Catholic Primary School
St. Philomena’s Roman Catholic Primary School
St. Vincent’s Catholic Primary School
Stewart Fleming Primary School
The Highway Primary School
The Priory School
Traveller Law Reform Project
Tubbenden Junior School
Unicorn Primary School
Valley Primary School
Warren Road Primary School
Wickham Common Primary School
Wickham Court School
Worsley Bridge Junior School

Sports Clubs / Organisations

Shortlands Golf Club
Beccehamians Rugby Football Club
Beckenham Cricket Club
Beckenham Rugby Football Club
Beckenham Town Football Club
Bickley Park Cricket Club
Blackheath Harriers
Broke Hill Golf Club
Bromley Bowling Club
Bromley Cricket Club
Bromley Football Club
Bromley Indoor Bowls Centre
Bromley Lawn Tennis Club
Bromley Town Bowling Club
Bromley Valley Gym Centre
Brookside Football Club
Chelsfield Cricket Club
Chelsfield Lakes Golf Club
Chelsfield Park Cricket Club
Chislehurst & West Kent Cricket Club
Coney Hall Football Club
Cray Valley Bowls Club
Crown Golf
Cyphers Indoor Bowling Club
Downe Cricket Club
Downham & Bellingham Cricket Club
Farnborough (Kent) Sports Club
Flamingo Park Sports & Leisure Club
Kent County Cricket Club
Knoll Lawn Tennis Club
Langley Park Sports & Social Club
Leaves Green Bowmen
Old Bromleians Football Club
Old Dunstonians Sports Club
Old Elthamians Sports Club
Old Wilsonians
Orpington Rovers FC
Park Langley Club: Squash/Badminton
St. Nicholas Rifle & Pistol Club
Sundridge Park Lawn Tennis & Squash
Raquets Club
Sydenham Lawn Tennis & Croquet Club
Sydenham Sports Club
Warman Sports Trust
Wendover Lawn Tennis Club
Westbury Lawn Tennis Club
Westcombe Park & Orpington Sports Club
Wickham Park Sports Club Ltd
Addresses within 100m of proposed allocations contacted by post.

<table>
<thead>
<tr>
<th>Site</th>
<th>Proposed Allocation</th>
<th>No. of addresses contacted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beechwood Centre</td>
<td>Additional LSIS</td>
<td>14</td>
</tr>
<tr>
<td>Bencewell Business Park Oakley Road</td>
<td>Additional LSIS</td>
<td>3</td>
</tr>
<tr>
<td>Bromley Industrial Centre + others, Waldo Road</td>
<td>Additional LSIS</td>
<td>12</td>
</tr>
<tr>
<td>Enterprise House 27 Hastings Road Bromley</td>
<td>Additional LSIS</td>
<td>22</td>
</tr>
<tr>
<td>Franklin Industrial Centre 20 Franklin Road</td>
<td>Additional LSIS</td>
<td>22</td>
</tr>
<tr>
<td>Higham Hill Farm Layhams Road Keston</td>
<td>Additional LSIS</td>
<td>9</td>
</tr>
<tr>
<td>Kimberley Business Park Blackness Lane</td>
<td>Additional LSIS</td>
<td>4</td>
</tr>
<tr>
<td>Bassett's Campus, Broadwater Gardens</td>
<td>Housing Site Allocation</td>
<td>170</td>
</tr>
<tr>
<td>Bromley North Station</td>
<td>Housing Site Allocation</td>
<td>547</td>
</tr>
<tr>
<td>Bromley Valley Gym</td>
<td>Housing Site Allocation</td>
<td>148</td>
</tr>
<tr>
<td>Former depot, Bruce Grove</td>
<td>Housing Site Allocation</td>
<td>104</td>
</tr>
<tr>
<td>Gas Holder Homesdale Road/Liddon Road</td>
<td>Housing Site Allocation</td>
<td>127</td>
</tr>
<tr>
<td>Land adj Bickley Station, Southborough Road</td>
<td>Housing Site Allocation</td>
<td>112</td>
</tr>
<tr>
<td>Bromley Civic Centre</td>
<td>Housing Site Allocation</td>
<td>186</td>
</tr>
<tr>
<td>1 Westmoreland Road (BTC AAP Proposal site L)</td>
<td>Education</td>
<td>96</td>
</tr>
<tr>
<td>Bromley Education Trust</td>
<td>Education</td>
<td>100</td>
</tr>
<tr>
<td>Bushell Way, Former Whitehorse Hill Allotments</td>
<td>Education</td>
<td>261</td>
</tr>
<tr>
<td>Castlecombe Primary School</td>
<td>Education</td>
<td>28</td>
</tr>
<tr>
<td>Edgebury School &amp; Land Adjoining</td>
<td>Education</td>
<td>299 (of which 135 in Greenwich Borough)</td>
</tr>
<tr>
<td>Former Co-Op sports ground</td>
<td>Education</td>
<td>128</td>
</tr>
<tr>
<td>James Dixon Primary School</td>
<td>Education</td>
<td>33</td>
</tr>
<tr>
<td>Langley Park Boys &amp; Langley Park Girls Schools</td>
<td>Education</td>
<td>32</td>
</tr>
<tr>
<td>Mead Road School</td>
<td>Education</td>
<td>41</td>
</tr>
<tr>
<td>Midfield Primary School, The Landway Unit and The Link Youth Centre</td>
<td>Education</td>
<td>92</td>
</tr>
<tr>
<td>Oaklands Primary School</td>
<td>Education</td>
<td>45</td>
</tr>
<tr>
<td>Scotts Park Primary School</td>
<td>Education</td>
<td>41</td>
</tr>
<tr>
<td>St. Hughs Playingfield</td>
<td>Education</td>
<td>117</td>
</tr>
<tr>
<td>Location</td>
<td>Use</td>
<td>Code</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>----------------------</td>
<td>------</td>
</tr>
<tr>
<td>St. Mary Cray Primary School and adjacent Youth Centre</td>
<td>Education</td>
<td>10</td>
</tr>
<tr>
<td>Turpington Lane Allotments</td>
<td>Education</td>
<td>261</td>
</tr>
<tr>
<td>Wickham Common Primary School</td>
<td>Education</td>
<td>47</td>
</tr>
<tr>
<td>Hockenden Lane Sites</td>
<td>Gypsy &amp; Traveller Sites</td>
<td>21</td>
</tr>
<tr>
<td>Land at 148 Croydon Road, Keston</td>
<td>Gypsy &amp; Traveller Sites</td>
<td>19</td>
</tr>
<tr>
<td>Old Maidstone Road</td>
<td>Gypsy &amp; Traveller Sites</td>
<td>54</td>
</tr>
<tr>
<td>Sites in Sheepbarn Lane/Layhams Road</td>
<td>Gypsy &amp; Traveller Sites</td>
<td>51</td>
</tr>
<tr>
<td>Star Lane, St Paul's Cray</td>
<td>Gypsy &amp; Traveller Sites</td>
<td>39</td>
</tr>
<tr>
<td>Beckenham High Street</td>
<td>Key Office Clusters</td>
<td>27</td>
</tr>
<tr>
<td>Crayfields Industrial Park &amp; Cray West Centre</td>
<td>Key Office Clusters</td>
<td>12</td>
</tr>
<tr>
<td>Masons Hill</td>
<td>Key Office Clusters</td>
<td>31</td>
</tr>
<tr>
<td>Orpington High Street</td>
<td>Key Office Clusters</td>
<td>19</td>
</tr>
<tr>
<td>Biggin Hill Airport Strategic Outer London Development Centre</td>
<td>SOLDC</td>
<td>69</td>
</tr>
<tr>
<td>Crystal Palace Draft Strategic Outer London Development Centre</td>
<td>SOLDC</td>
<td>19</td>
</tr>
</tbody>
</table>
Dear Sir/Madam

Bromley Local Plan – Draft Allocations, Further Policies and Designations Document

Your comments are invited on land uses, planning policies and potential development sites in the borough. The proposals are contained in the Draft Allocations, Further Policies and Designations (DAFPD) document which has been published for consultation as part of the preparation of the Local Plan for the borough.

We are consulting you because, although you are not on our consultation database, you live nearby one of the sites for which there are specific proposals in this document, namely «Consultation Site Name». In total, there are more than 50 sites where changes are being proposed which could affect residents and businesses and the wider community over the coming years.

The Local Plan together with the London Plan will form the Development Plan for the Borough, and replace the saved Unitary Development Plan policies.

The DAFPD is an important stage in the preparation of the Local Plan. It provides another opportunity for local residents, businesses, partner agencies and the wider community to be involved in the plan-making process. Apart from the specific site mentioned in this letter, there are other site specific proposals, additional and changed designations and policies.

The proposals build on the earlier public consultation work undertaken by the Council, as well as the ongoing engagement with the community, partner agencies and other local authorities in line with Bromley Council’s adopted Statement of Community Involvement.

The document is available for inspection and comment via the link to the 'Planning Consultation Portal' on the 'Developing Bromley's Local Plan' page of the Council’s website www.bromley.gov.uk/localplan until 31st October 2015.

You will need to register or already be registered in order to make comments. If you have registered but have forgotten your 'User Name' and/or 'Password', please follow the instructions under 'Login/Register' on the Planning Portal site. If you have problems go to the Help icon and select registering online for assistance.

17th September 2015
Copies of the document can be viewed at any of the libraries within the Borough, Upper Norwood Joint Library, the Civic Centre in Bromley and the Outreach Centres at Mottingham (1-3 Cranley Parade) and 64 Cotmandene Crescent, St. Paul’s Cray during their normal working hours. If you need any help regarding the consultation, please contact the Planning Policy team on the above number.

Please submit comments by 31st October 2015.

The comments received will be made public in a report when they are considered by the Council and will be used to develop the next stage of the Local Plan.

Yours faithfully,

Jim Kehoe
Chief Planner
Planning Division
Department of Renewal and Recreation
London Borough of Bromley Proposed Submission Draft Local Plan

How to respond to the Draft Local Plan

The London Borough of Bromley’s Proposed Submission Draft Local Plan is being published for consultation. This consultation is undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). Representations received during this process will be submitted along with the Draft Local Plan for Examination by an independent Inspector, appointed by the Planning Inspectorate.

Following previous targeted consultations, the Council has now prepared a set of documents that it intends to submit for final approval, including the Draft Plan main policy document, policies maps and supporting evidence base and appendices.

Advice for preparing a representation

At this stage of the Local Plan process, the Council is asking for feedback on matters of legal compliance, soundness and compliance with the Duty to cooperate. This is consistent with the requirements of the Planning and Compulsory Purchase Act 2004 (as amended).

When making a representation, you should consider whether the Draft Plan demonstrates the following:

Legal compliance

- The Draft Plan should be included in the current Local Development Scheme (LDS), a programme of work produced by the Council including the Local Plan and relevant supporting documents;
- Community consultation should be undertaken in general accordance with the Council’s Statement of Community Involvement (SCI)¹;
- The Draft Plan should be published in accordance with the Regulations², including publication of all documents prescribed by these Regulations, both at the Council offices and on the Council website. The Council must also notify relevant persons and organisations identified in the Regulations and any persons who have requested to be notified;
- The Council must provide a Sustainability Appraisal Report during publication of the Draft Plan. This should also identify how the appraisal was carried out,

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the baseline information used to inform the appraisal and the outcomes of that process;

- The Draft Plan should be in general conformity with the London Plan\(^3\).

**Soundness**

- The Draft Plan should demonstrate soundness as explained in paragraph 182 of the National Planning Policy Framework (NPPF)\(^4\), which includes a series of principles outlined below.
- **Positively Prepared.** The Draft Plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified.** The Draft Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective.** The Draft Plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
- **Consistent with national policy.** The Draft Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

**Compliance with the Duty to co-operate**

- The Council is expected to provide evidence of how it has complied with the requirements of the Duty to co-operate\(^5\). How to complete your representation

Representations must be received by the Council by no later than **5pm, 31 December 2016.**

Representations can be made using the Council’s online Consultation Portal: [www.bromley.gov.uk/localplan](http://www.bromley.gov.uk/localplan). The Consultation Portal allows you to view all the Draft Plan documents which have been published for consultation. This is the Council’s preferred option for receiving and processing representations. To use this option, please follow the Login / Register link on the Portal’s home page.

If you cannot make a representation using the Consultation Portal, you may also provide representations by the following options:

- **by email** to [ldf@bromley.gov.uk](mailto:ldf@bromley.gov.uk);
- **by post** to the Council’s mailing address (see next page).

Attached to this guide is a **Representation Form** to be used for commenting on particular policies or elements of the Draft Plan.

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3 The London Plan (Greater London Authority 2015): [https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan](https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan)


The Representation Form contains three Parts:

- **PART A: Personal Details.** These details are required in order to be considered by the Council and the Inspector as a valid representation. Personal details collected by the Council will be handled in accordance with the Data Protection Act 1998. However, please be aware that representations made anonymously or without a valid postal address will not be considered.

- **PART B: Your Representation.** A separate copy of this Part must be completed for each section, policy or other element of the Draft Plan you wish to comment on. This Part should be completed with clear reference to the above considerations on legal compliance, soundness and compliance with the Duty to co-operate.

- **PART C: Appearing at the examination.** This Part of the Representation Form asks you if you wish to participate at the oral examination to be conducted by an independent Inspector following the Council's submission of the Draft Plan. As with Part B, a separate copy of this Part must be completed for each section, policy or other element you wish to comment on. If you wish to participate at the oral examination, you must provide an explanation as to why you consider this to be necessary, with specific reference to the section, policy or other element of the Draft Plan in question.

When making a representation via the online Consultation Portal, the Representation Form can be completed by following the Add Comments links found within the document itself.

If you need to make a representation by email, please complete and attach the Representation Form which can be found in the Supporting Documents folder of the Consultation Portal: www.bromley.gov.uk/localplan.

If you need to make a representation by post, please download and print the Representation Form from the above link. Alternatively, you may pick up a copy of the Representation Form from the Bromley Civic Centre or any London Borough of Bromley library. Please send a completed copy of the form to the mailing address of the Council’s Planning Strategy Team

**Contact us**

For more information on the Draft Plan consultation process, or for further guidance on making a representation, please contact the London Borough of Bromley’s Planning Strategy Team:

**Email:** ldf@bromley.gov.uk
**Phone:** 020 8313 4730
**Mailing address:** Planning Strategy Team
London Borough of Bromley Civic Centre
Stockwell Close
Bromley BR1
3UH
London Borough of Bromley
Proposed Submission Draft Local Plan

Representation Form PART A:

Personal Details

1. Personal Details Details

<table>
<thead>
<tr>
<th>Title</th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Last Name</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Job Title</td>
<td></td>
<td></td>
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<tr>
<td>Organisation</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address Line 1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Line 2</td>
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<tr>
<td>Post Code</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Telephone Number</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Agent’s (if applicable)

|                           |                           |
|                           |                           |
PART B: Your Representation

3. To which part of the Draft Plan does this representation relate? Section [ ] Policy [ ]
   Other Element [ ]

4. Do you have any concerns over whether this part of the Draft Plan is legally compliant? Please elaborate below.
5. Do you have any concerns over soundness of this part of the Draft Plan? Please elaborate below, with specific reference to the principles outlined in paragraph 182 of the National Planning Policy Framework (see guidance note “How to respond to the Draft Local Plan”)

6. Do you have any concerns over whether the Council has complied with Duty to co-operate? Please elaborate below.

Please continue on another page if necessary
Representation Form

PART C: Appearing at the examination

7. With regard to this particular section, policy or element of the Draft Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note. The independent Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral examination.

Representations must be received by the Council by no later than 5pm, 31 December 2016
Newspaper Wraparound

Front

BROMLEY COUNCIL'S NEW PLANNING STRATEGY
2030...
We’re looking forward to Bromley’s future

Help us shape your borough

www.bromley.gov.uk/ldf

Back

Bromley Council is asking for your help to develop a long term plan shaping the Borough.

We’re setting out options for Bromley’s future looking at:

- Living in Bromley
- Supporting communities
- Getting around
- Working in Bromley
- Bromley’s valued environments
- Environmental challenges

Commenting is easy. You can either:

- Go to our website www.bromley.gov.uk/ldf
- Visit your local library and ask for the "Bromley Local Plan Options and Preferred Strategy" document
- If you need any help getting online contact Bromley Council Planning on 07738 510 485

The consultation runs until 13 April 2013
So tell us what you think!

www.bromley.gov.uk/ldf

Inside Pages

Objectives for Bromley

Positioning our Borough for the future

Open Space and the Natural Environment

- Enhance the provision and improvement of new parkland
- Ensure that the green belt is maintained
- Maintain open spaces
- Provide a high quality of new urban spaces

Health and Wellbeing

- Neighbourhoods offer good quality homes and an accessible range of shops and services
- Promote healthy lifestyles
- Encourage social interaction

Environmental challenges

- Protect the health and safety of the local community
- Protect the environment
- Enhance the quality of life for residents

Built heritage

- Continue to protect locally and nationally significant heritage assets
- Encourage development complements and improves the existing heritage assets
- Encourage greater accessibility of heritage assets
- Encourage a proactive approach to the protection and improvement of heritage assets to contribute to strategic, local planning and economic objectives

Transport

- Reduce road congestion at peak times through better management of travel and encouraging alternative modes of travel
- Provide new and improved public transport links
- Improve cycling facilities

Homes

- Encourage new residential development and conversions
- Improve local environments
- Support local communities
- Enhance the attractiveness of our town centres

Design and the public realm

- Encourage the development of attractive urban spaces
- Enhance public realm
- Improve the public realm

Business, employment and the local economy

- Encourage business and employment opportunities
- Promote economic growth
- Encourage local businesses

Full list of objectives and options visit www.bromley.gov.uk/ldf
Dear Resident,

I’m proud we are investing in our future in many different ways. This is part of our prudent approach to managing funds effectively on behalf of our residents.

One way is by getting better returns on our investments. Over the past couple of years the Council has invested some of its funds in income earning property investments. These purchases are on track to achieve an annual income of £5 million – five or six times the earnings from the equivalent investments in bank deposits. The returns go towards providing frontline services and help balance our budget year on year.

Further, we constantly review the way we deliver services to ensure they are efficient and cost effective. Whether we decide to retain a service in-house, or to commission it out to others better placed to provide it, ultimately we still control the character and quality of the service you experience. If we can deliver in a different way and save money, we make no apology for making such a choice.

I am delighted our town centres are the focus of many enhancements and, looking ahead, we want to invest further in our borough by continuing to encourage high quality development, while at the same time protecting the unique character of Bromley. I encourage you to take part in the consultation to develop our Local Plan this autumn. Please see the lead story in this edition of Update to find out more.

Councillor Stephen Carr
Leader, Bromley Council

Planning for the future

Residents and businesses are being alerted to a major consultation exercise by the Council covering land uses, planning policies and potential development sites in the borough.

The consultation, due to begin in the autumn, is part of the process in drawing up Bromley’s Local Plan, which will set the pattern of development across the borough over the next 15 years. Views will be sought on a wide range of topics concerning the future of the borough such as draft site allocations for housing development, education uses, business and employment, land and nature conservation. The plans cover the entire borough and contain particular reference to Elgin Hill and Crystal Palace.

The Local Plan has to balance the requirement for development with the continued protection of the high quality environment that makes Bromley such an attractive place to live and work. Maintaining the unique character of Bromley is a priority and the Local Plan has an important part to play in encouraging high quality development in the borough.

Responses to the consultation will be taken into account in finalising the draft Local Plan which will undergo further consultation before being submitted to the Secretary of State for independent examination in 2016.

Further information about the Local Plan is available online at www.bromley.gov.uk/localplan and a link to the consultation will be available when it goes “live” in the autumn.
Consultation - Proposed Submission Draft Local Plan

Bromley Council is consulting on its Proposed Submission Draft Local Plan (the Draft Local Plan). This is the latest in a series of consultations on the developing Local Plan for the Borough which, when adopted, will guide development over the next 15 years.

Your views are sought on whether the Draft Local Plan is "sound" and whether the Council has complied with its legal obligations in drawing up the plan. Further information about what this means, and how to comment can be accessed via this link http://bromley-consult.limehouse.co.uk/portal/pslp/dlp
The Local Plan is shortly to be submitted to central government for approval. There is a final opportunity to comment, before 31 December, on their website. Find it here.
Penge and Cator Councillors website

http://www.pengeandcatorcouncillors.co.uk/

Latest news from the Penge and Cator councillors on Bromley Council

Bromley Local Plan Consultation

Posted on November 17, 2016 by pengeandcatorcouncillors

A bit of a dry subject we know but Bromley are currently consulting on the future of the borough in respect of planning up until the 2030’s and beyond until December 31st. This is the final stage of consultation and involves housing, schools, the future of the Green Belt, business and employment. For more information, please go to http://www.bromley.gov.uk/localplan
Residents invited to have their say on land use and planning policy

12:13 15 November 2016

Simon Allin

The council is holding a consultation on the final stage of the Local Plan

Residents have been invited to give their views on land use, planning policies and potential development sites across the borough.

A consultation - the final stage of the Local Plan - has been launched by the council, and includes draft site allocations for housing, education use, business and employment land, and nature conservation.

Local people and businesses who have yet to respond can do so by visiting www.bromley.gov.uk/localplan

Council leader Stephen Carr said: “Whether it be homes, schools for our children or premises for business to thrive and prosper, we need to ensure that we have the right development coming forwards in the right place.

“Our proposed Local Plan has to balance the need for land for development coming forward with the continued protection of the high quality environment that makes Bromley an attractive place to live and work.

“There is rightly enormous interest in future development in the Borough, particularly when it is near to where we live. Maintaining the unique character of Bromley is a priority and we want to ensure that our Local Plan encourages high quality development.
“Individual planning applications will be ultimately determined using the policies in the Local Plan so it is important to a wide range of people and organisations and I would encourage anyone who is interested to get involved in this consultation.”

Responses to this consultation will be taken into account in finalising the Draft Local Plan and will form part of the information that the council submits to the Secretary of State for independent examination in 2017 by a planning inspector.

The deadline for the submission of responses is December 31.
Bromley council launches consultation on development blueprint

Saturday, 3 December 2016 By Luke King in Planning

RESIDENTS are being invited to have their say on land uses, planning policies and potential development sites in Bromley borough.
The consultation, open until December 31, 2016, comes as Bromley puts the finishing touches on the borough’s Local Plan, which sets out a development programme for the next 15 years.

The consultation details draft site allocations for housing, education use, business and employment land, as well as nature conservation. Both Biggin Hill and Crystal Palace Park are mentioned in the council’s plans.

Councillor Stephen Carr, leader of Bromley council, said: “Whether it be homes, schools for our children or premises for business to thrive and prosper, we need to ensure that we have the right development coming forwards in the right place.

“There is rightly enormous interest in future development in the borough, particularly when it is near to where we live. Individual planning applications will be ultimately determined using the policies in the Local Plan so it is important to a wide range of people and organisations and I would encourage anyone who is interested to get involved in this consultation.”

Responses to the consultation will be taken into account in finalising the Draft Local Plan and will form part of the information the council submits to the Secretary of State for independent examination in 2017.

Visit www.bromley.gov.uk/LocalPlan
BROMLEY BOROUGH 2026 AND BEYOND……..

November 21, 2016
by jerrygreen85
Bromley 2026 and beyond, Bromley council draft local plan November 2016, Crystal Palace Park
0 Comment
BROMLEY BOROUGH 2026 AND BEYOND……..

A major consultation about land uses, planning policies and potential development sites across Bromley borough is now under way until 31 December 2016. This is intended to be the final formal stage of consultation in the development of Bromley’s Local Plan which will set the pattern of development across the borough over the next 15 years.

Interested residents and businesses are encouraged to respond and register if they haven’t already, on the website by visiting www.bromley.gov.uk/LocalPlan.

The consultation includes draft site allocations for housing, education use, business and employment land, and nature conservation. The plans also specifically mention both Crystal Palace park and Biggin Hill. Bromley council leader Cllr Stephen Carr said, “Whether it be homes, schools for our children or premises for business to thrive and prosper, we need to ensure that we have the right development coming forwards in the right place.

“Our proposed Local Plan has to balance the need for land for development coming forward with the continued protection of the high quality environment that makes Bromley an attractive place to live and work.

“There is rightly enormous interest in future development in the borough, particularly when it is near to where we live. “Maintaining the unique character of Bromley is a priority and we want to ensure that our Local Plan encourages high quality development.

“Individual planning applications will be ultimately determined using the policies in the Local Plan so it is important to a wide range of people and organisations and I would encourage anyone who is interested to get involved in this consultation.”

Responses to this consultation will be taken into account in finalising the Draft Local Plan and will form part of the information which the council submits to the Secretary of State for independent examination in 2017 by a Planning Inspector.

Further information about Bromley’s Local Plan is available at www.bromley.gov.uk/LocalPlan
(Source: Bromley council press release)

http://www.newsfromcrystalpalace.co.uk/bromley-borough-2026-and-beyond /