

## Comments on the Draft Revised SCI and Responses - 2016

No.	Consultee/Respondent	Comment	Officer Comments
<b>Introduction</b>			
Q1 Has this document given you a clear understanding of how the Council intends to engage with the community?			
	Very Clear	2 29%	
	Good	3 43%	
	Moderate	2 29%	
	Limited	0 0%	
Q2 Do you believe that we are seeking to involve all of the right groups of people in preparing future planning policies?			
	Yes	5 71%	
	No	2 29%	
Q3 If No, which additional groups should be included?			
3	Bromley resident	I think you exclude many people because of the complexity of this format. You must have some super-grad designing the portal because technically it is excellent but usability and design is poor. I can't imagine e.g. pensioners or perhaps those with limited intelligence getting to far down the line with the consultation. I work in system design and I am not convinced that usability was the major consideration. So I imagine a lot of residents will feel excluded.	The consultation software provided by Objective is used by many councils and is the UK's largest dedicated public sector cloud of consultation and engagement activities. Paper copies are available at Libraries, the Resource Centres, Community House and main reception at the Civic Centre.
20	Resident of South Eden Park Road	I have only lived in the borough a couple of years and the only real experience I have of Bromley council's "involvement" of local communities in planning is the case of the proposed KFC outlet in West Wickham. The complete and utter disregard for the opinions and concerns of local people in this process has astounded me, Such a shame. West Wickham high street is in dire need of a little modernisation but another fast food outlet creating even more traffic at an already snarled up roundabout is about as far from 'the right thing' as I can possibly imagine. It is also completely against the wishes of most local residents - at least I have yet to find a single person who thinks its in any way a good idea. Apologies	The application referred to was only considered when a further traffic assessment was undertaken, because of local concern, with the original decision deferred. This response demonstrates the need to better outline how the planning process works, not just in the local context but also in the national context too.

		for the rant but for this reason I therefore have very little confidence that local people have any say in the planning of our area, or that opinions will be truly listened to.	
34	Lanniston Developments Limited	Consultations on planning should involve proactively engaging the local development community, local builders, local planning consultants and others that derive their living from housebuilding and associated trades.	The Council has a consultation database that includes 1300 organisations and individuals. Any local builder or company making a living from housebuilding and associated trades could join the database. Local businesses can be alerted to consultations via the Business e-Bulletin emails sent to a range of businesses in, or working in, Bromley.
49	Petts Wood & District Residents' Association	Bromley Residents' Federation - Planning representative	Bromley Residents' Federation are already on the consultation database
Q4 Is the list of techniques described in this document sufficiently comprehensive to provide good community engagement?			
	Yes	5 83%	
	No	1 17%	
Q5 If No, which other consultation techniques would you add?			
	No replies		
Q6 Do you agree with the text and diagram in that section?			
5	Bromley resident	Yes	
23	CRA20TEN	We agree with the text and diagram in the Introduction section, the process appears reasonable	Noted
45	Lanniston Developments Limited	This process is too autocratic, DC is made up of a bunch of NIMBYs that stand in the way of progress and development and will ignore the views of the majority of locals. We will never see a polarised debate at DC with both sides of the argument being heard. DC should have appointed representatives from local companies even if they do not receive a vote at least a proper debate can be held. Same for the full council, appointed business leaders should be co-opted to participate in discussions. This might also help attract more potential councillors with the right credentials to create a more balanced approach to planning and housing and consider the wider community benefits.	The Council's decision making structure is not in the remit of this consultation or part of the Statement of Community Involvement.
51	Petts Wood & District Residents' Association	Yes	Noted
17	Resident of Lee, SE12	Yes	Noted

Q7 Do you have any general comments on this section?			
6	Bromley resident	Overall process is too complex for many	The plan making process is set by legislation.
24	CRA20TEN	No other comments on the introduction section	
35	Lanniston Developments Limited	I still have concerns that your public consultation in this fashion will fail to engage 98% of the population. More effort is needed to proactively get out in the community and canvass the average man in the street. My suspicion is that such a low key approach suits officers and members as it helps maintain the status quo.	The Council has received constructive feedback and whilst most residents don't respond to strategic consultations, the feedback will help make sure that the right level of consultation takes place for development proposals
<b>Engaging the community</b>			
Q8 Do you have any general comments on this section?			
36	Lanniston Developments Limited	There is clear opportunity to move with the times, social media is probably the most widely used forum today. This could be employed for instant public reaction to consultation issues. Bromley's planning access website is atrocious and suffers frequent down time, is not intuitive or user friendly and should be radically overhauled. Public comments should be made public and not kept secret. This would prevent spiteful objections which have become common place under the safety of anonymity. Other local authorities already operate in such a fashion.	The Council already uses social media to engage with the public. This is one of many consultation methods the Council uses. The Planning Access website is the customer facing version of the Council's Planning database. It relies on a good internet connection. This occasionally fails but the site is generally robust. An upgrade is expected in the summer along with a plan measuring tool. The publication of comments is an option but this may reduce the amount of comment received and will be considered more fully in due course.
59	Orpington and District Archaeological Society	The Orpington and District Archaeological Society is still active and wishes to be kept involved in the planning policy process.	Noted
25	CRA20TEN CRA20TEN	We would welcome an obligation by developers of 'Significant Applications' and the LB Bromley Planning Department under Paragraph 155 of the NPPF to consult local and neighbourhood organisations by public consultation including the use of public meetings. The term 'Significant Application' should be clearly defined, as applications that will have an impact on the local amenity. The definition should be clearly laid out and applied rigorously by the Planning Department. Certain area's would involve special consideration as an 'Area of Special Residential Character'. It is our opinion	The term "Significant Application" is clearly defined but perhaps needs to be better publicised locally to aid understanding The request for an assessment of the area as an Area of Special Residential Character is noted and will be taken forward at a later date. The Cray Valley has been proposed as a "Renewal Area" which would include support for health and wellbeing and improvements in accessibility. The Council is using the plan making process to identify sites for new schools to ensure there are

		<p>as a local residents' association representing over thirty roads in the Cray Valley West Ward, that our ward, and the area generally defined as St Paul's Cray and St Mary Cray should be considered as such, as an Area of Special Residential Character, recognising the historical commitment to low density housing with high spatial standards with public/private amenity space.</p> <p>The 'ASRA' should be considered as part of the Neighbourhood Plan when any Significant Applications are submitted.</p> <p>As LB Bromley's largest commercial and industrial area, designated the Cray Business Corridor, whilst the job opportunities are very welcome, with over 10% of the residential population of LB Bromley, we would like it recognised that the density of both commercial, industrial and residential populations has resulted in a significant impact on infrastructure of highways, schools and health amenities. We would therefore like such area's to be given additional consideration within any policy planning and future significant development applications for strict appliance of the definition.</p> <p>In summary, the term 'Significant Application' should be clearly defined and in certain important strategic areas, such as the Cray Corridor', should be strictly applied to enable the area to work in an efficient manner in the future.</p> <p>There is a potential, if policies are not strictly applied, for an area to become grid locked in terms of highways, Schools or Health, this would have a significant impact financially on the borough.</p>	<p>enough places to meet the requirements of local children and their parents.</p>
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**Involving the Community in Policy Planning**

Q9 Do you agree with the text, diagram and tables in this section?

Yes	3	100%
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Q10 Do you have general comments on this section?

21	Resident of South Eden Park Road	All sounds good on paper but I have lost faith in the council following the decision to allow KFC to go ahead in West Wickham.	Noted but see previous response
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27	CRA20TEN	We think that the adoption of Neighbourhood Plans, working in conjunction with the Planning department is a welcomed contribution. We feel that any such recognised Neighbourhood Forum should be given real powers to influence and not be just simply 'talking shops'.	Noted
37	Lanniston Developments Limited	I do think there is need for impartial, independent outside scrutiny to encourage healthy debate and to prevent the council acting as an autocracy.	The Council makes its best efforts to encourage comments from the wider community. Over 1300 people and organisations are on our Planning consultation database. The Council's wider decision making process is outside the scope of this consultation.
54	Knoll House Residents' Association	Whilst communicating on-line with interested groups may be the Council's preferred method of communication, the lack of availability of large documents e.g. LDP and even those at present offered for consultation make it very difficult for individual members of, for instance, residents groups to have a prior discussion to formulate a collective view before its submission. Placing a single copy of a consultation document in a local library is simply not sufficient if the Council really wants to engage the community. Both The Beckenham Society and other groups have found that this hampers their ability to formulate collective comments. Efforts to make more hard copies available would be appreciated.	Two copies of each consultation document are sent to libraries. The Council will review the number of copies sent to libraries in time for the final Local Plan consultation. It may be that a flexible approach is needed and the more important the document, the more copies will be available.
57	Orpington and District Archaeological Society	The Orpington and District Archaeological Society are happy to view documents online.	Noted
<b>Involving the community in Planning Application Decisions</b>			
Q11 Do you have general comments on this section?			
28	CRA20TEN	In general, the text is welcomed, we would stress that significant applications are discussed publically with local communities.	Noted
41	Lanniston Developments Limited	All sounds very good but this is not what happens in reality. Elected members interfere with the planning process far too often. Bromley has four planning committees when one with qualified and appropriate members would make far better and less costly decisions. Use of external town planners or cross employment with	The Council's decision making structure is not in the remit of this consultation or part of the SCI. The vast majority of planning applications are not actually considered by planning committees but more significant applications are considered by planning committees which aids transparency and

		neighbouring boroughs would reduce the risk of intimidation from members.	local democracy.
53	Petts Wood & District Residents' Association	It is good practice to alert groups/individuals to significant applications which have the potential to create considerable change in an area. It is important to involve relevant community groups as well as those who represent the interests of the entire borough i.e. The Bromley RA Federation	Noted. The SCI states that for "Significant Applications", a developer should contact both local residents and interest groups and arrange a public meeting or exhibition prior to the application being submitted.
55	Knoll House Residents' Association	The validation process itself has not been included. This is reviewed periodically by Development Control and reference to a list of requirements should be mentioned in the body of this document and appended in full. The list of requirements should also include the site area and the proposed density of new and additional development	The validation process, i.e. checking whether an application is valid, takes place before neighbour and other notifications are sent out and is not part of the consultation process.
58	Orpington and District Archaeological Society	The Orpington and District Archaeological Society welcomes the proposal that before a "significant" application is submitted to the Council, applicants will be expected to contact local interest groups of the development proposed. We also appreciate the weekly planning lists on the council's website.	Noted

### Monitoring and Review

Q12 Do you have any general comments on this section?

38	Lanniston Developments Limited	We have already seen that respondents to the Local Plan consultation were tenfold over the previous period. Gone are the days when just paying lip service to public consultation obligations allowed councils to do as they please. Public servants need to recognise that they are such and are funded by the taxpayer.	Noted – the Council welcomes comments on its proposed Local Plan.
7	Bromley resident	Over complexity will reduce use of website	Noted
29	CRA20TEN	The text is ok	Noted
39	Lanniston Developments Limited	We have to be ever mindful of the NIMBY lobby who will lend mutual support to stand in the way of progress. A small organised group will often make the most noise and lobby their local councillors even when the wider majority would fully support what is being proposed. This is	The Council receives both pro and anti-development comments.

		difficult as most of the elected members are entrenched in Nimbyism in there local wards and associations. This is not unsurprising but the issue needs to be addressed in a proper democratic fashion. There is also a climate of jealousy within the council over those that make money or profits. The commercial aspect of what a development contributes to society is often overlooked or ignored.	
56	Knoll House Residents' Association	I appreciate that only a limited number of local people will wish to respond to consultations. However, far better publicity could be given to the availability of documents offered for consultation e.g. local press (not just a statutory notice) by inviting the Editor to include a short article in local press	Editors will naturally decide to include a story but more publicity could be considered for larger applications, with applicants needing to be part of this

### Financial and Legal considerations

Q13 Do you have any general comments on this section?

30	CRA20TEN	Financial constraints should not be allowed to impede public consultation on significant applications	Noted
40	Lanniston Developments Limited	If the costs awarded against the council on numerous planning appeals were instead channelled in to a better decision making process in the first place then this would almost undoubtedly save the taxpayer money. Lack of time or recourses should not be used as an excuse to create a local plan that will be pulled to pieces by a planning inspector or risk government intervention because it has not been adopted. The current housing crisis and proposed changes to NPPF should also be considered at this stage.	The Council rejects a planning application based on its policies and principles and then sometimes needs to outline the reasons at an appeal. If costs are awarded by a Planning Inspector, then the Council do not have an option but to pay these costs.

### Representations received by post

x	Wickham Common Residents' Association	Various comments on the validation process and suggested amendments to the "Involving the Community in Planning Applications" section of the Statement of Community Involvement.	The suggestion to mention that documents are available to view on Public Access only after the application is deemed valid will be included in the Statement of Community Involvement along with a clarification that documents are available on the Planning Public Access website.
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**Representations received by email**

x	NLP Planning on behalf of London Biggin Hill Airport	Reminding the Council about physical and technical safeguarding and bird strikes around the airport	Noted and passed to Development Control
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