Sustainability Appraisal (SA) of Bromley's Proposed Submission Draft Local Plan

SA Report

November 2016

REVISION SCHEDULE					
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INTRODUCTION

1 BACKGROUND

1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Bromley Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives, in terms of sustainability issues, with a view to avoiding and mitigating negative effects and maximising the positives. SA of Local Plans is a legal requirement.[1]

2 SA EXPLAINED

2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'), which were prepared in order to transpose into national law EU Strategic Environmental Assessment (SEA) Directive.[2]

2.1.2 In-line with the SEA Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[3] The SA Report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**
   – Including with regards to consideration of 'reasonable alternatives'.
2. What are the SA findings **at this stage?**
   – i.e. in relation to the draft plan.
3. What happens **next?**
   – What steps will be taken to finalise the plan?
   – What measures are proposed to monitor plan implementation?

2.2 This SA Report[4]

2.2.1 This document is the SA Report for the Bromley Local Plan (hereafter referred to as the 'Draft Local Plan'), and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

2.2.2 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What's the scope of the SA?

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] Directive 2001/42/EC
[3] Regulation 12(2)
[4] See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely where within this report certain regulatory reporting requirements are met.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 The Draft Local Plan will set out the vision and objectives to 2030 and the planning policies to support their delivery. When finalised it will also include a policies map showing designations and site allocations, and incorporate an Infrastructure Delivery Plan to support the delivery of the vision and objectives.

3.1.2 The Draft Local Plan has to be in general conformity with the London Plan (as revised, March 2016) and with the National Planning Policy Framework (NPPF) published in March 2012. The preparation of the Draft Local Plan has to meet the requirements of planning legislation and regulations, including the Duty to Co-operate introduced in the 2011 Localism Act. The Duty to Co-operate places a legal duty on the Council to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Neighbouring authorities, with whom Bromley has a duty to cooperate, include other South East London Boroughs (Croydon, Lambeth, Southwark, Lewisham, Greenwich and Bexley) and North Kent Districts (including Sevenoaks and Dartford).

3.2 Plan objectives

3.2.1 A 'vision' for the Borough has been established, which informed development of the following objectives for the Draft Local Plan:

- Open Space and the Natural Environment
  - Manage, protect and enhance natural environments;
  - Encourage the protection and enhancement of biodiversity;
  - Ensure that the Green Belt continues to fulfil its functions; and
  - Improve the quality of open space and encourage provision in areas of deficiency and in any new development.
- Health and Wellbeing
  - Produce healthier environments and infrastructure to support people in living fuller, longer, healthier, more sustainable lives;
  - Co-ordinate the improvement of Bromley's designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments;
  - Neighbourhoods offer good quality homes and an accessible range of shops and services, appropriate to the roles of the different centres - from town centres to local neighbourhood centres and parades; and
  - Ensure new community facilities are appropriately located to provide accessible effective modern services, and resist the net loss of facilities.
- Homes
  - Ensure there is an appropriate supply of homes to meet the varied needs of the local population, which responds to changing demographics, in particular as the population ages;
  - Ensure new residential development, extensions and conversions complement and respect local character; and
  - Ensure new homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure.

- Business, Employment and the Local Economy
  - The Strategic Industrial Location and Locally Significant Industrial Sites are retained and adapt successfully to the changing needs of modern industry and commerce;
  - Ensure there are an appropriate supply of commercial land and a range of flexible quality business premises across the Borough;
  - Ensure businesses contribute to a high quality, sustainable environment, through their premises development and locational decisions;
  - Support the appropriate provision of facilities to deliver high quality education and training;
  - Support the Strategic Outer London Development Centre (SOLDC) designation at Biggin Hill to enhance the areas employment and business opportunities, whilst having regard to the accessibility and environmental constraints; and
  - Support the digital economy and the infrastructure required for it and modern business, such as high speed fibre connections.
- Town Centres
  - Ensure vitality of Bromley Town Centre, delivering the aims of the Area Action Plan;
  - Encourage a diverse offer of main town centre uses and complementary residential development. Support the continued improvement of Orpington and other district and local centres;
  - Encourage safe town centres and a prosperous evening economy; and
  - Maintain and improve neighbourhood centres and parades across the Borough to ensure locally accessible facilities.
- Design and the Public Realm
  - Ensure development attains high quality design standards;
  - Ensure development includes appropriate well planned private or public open space that promotes and enhances biodiversity;
  - Ensure public areas are well designed, safe and accessible.
- Built Heritage
  - Continue to conserve and enhance locally and nationally significant heritage assets;
  - Ensure development complements and responds to local character, and the significance of heritage assets, including their settings;
  - 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 the network and encouraging patterns of development that reduce the need to travel and by improving road junctions and layouts whenever and wherever possible;
  - Support improvements to public transport links, including associated parking, and facilitate environments that encourage walking and cycling;
  - Locate major developments where they can maximise the use of public transport;
  - Ensure new developments include electric charging points, cycling facilities, cycling facilities such as dedicated cycle routes and car clubs where appropriate, increasing choice for local people;

  - Ensure streets are safe, accessible and uncluttered, improve road safety and reduce air and noise pollution from traffic;
  - Ensure the efficient movement of freight, whilst minimising its impacts on the transport network; and
  - Secure investment in critical public transport infrastructure to improve transport connectivity and orbital movements to East London.

- Environmental Challenges
  - Reduce environmental impacts and the use of precious resources in the design and construction of new development;
  - Support the development of local energy networks and low-carbon and renewable energy facilities;
  - Improve the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised;
  - Reduce the amount of waste that ends up in landfill, particularly biodegradable waste, and increase self-sufficiency;
  - Reduce air pollution and minimise problems of noise and light pollution; and
  - Ensure contaminated land can be remediated where possible.

3.3 What's the plan not trying to achieve?

3.3.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus for SA.

4.1.2 Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix II**.

Consultation on the scope

4.1.3 The SEA Regulations require that *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report* [i.e. the SA scope], *the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.[5] As such, these authorities were consulted on the SA scope in 2013. Since that time, the SA scope has evolved as new evidence has emerged - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2013.

N.B. Stakeholders are also welcome to comment on the SA scope at the current time. Any comments received will be taken into account in due course (see Part 3 'Next Steps').

4.2 Key issues / objectives

4.2.1 The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Objectives are grouped under six sustainability 'topics'. Taken together, these sustainability topics and objectives provide a methodological 'framework' for appraisal.

Table 4.1: Sustainability topics and objectives (i.e. the SA framework)

Sustainability Topic	Sustainability Objectives
Biodiversity	• The Borough's existing natural assets should be protected from the impacts of future development and enhanced; in particular for areas that are home to declining species or habitats. • Bromley's network of green infrastructure should be protected, enhanced and strategically expanded to deliver benefits for people and wildlife.
Climate change mitigation	• There is a need to improve the energy efficiency of the Borough's housing stock to reduce domestic GHG emissions. • Development should be designed and constructed in order to minimise resource use and to maximise the opportunities for reuse and recycling. • A shift towards low-carbon and congestion reducing forms of transport will be required in order to reduce transport related emissions. • The Borough should aim to generate a greater proportion of energy from renewable sources.

[5] In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

Sustainability Topic	Sustainability Objectives
Community and well-being	• There is a need to provide services and suitable accommodation for older people as the population aged over 85 in Bromley. • Housing affordability is a significant issue for many in Bromley (and London in general) with demand for affordable housing set to continue to rise. • Gypsy and Traveller communities are in need of enhanced access to services and healthcare. • The Borough is relatively affluent however it has high levels of inequality with some areas suffering from the highest levels of deprivation. There is a particular need to reduce health inequalities in these areas. • There is a need to improve levels of educational performance in certain areas of the Borough; and as the number of young people grows there will a need to ensure that there is sufficient provision of education facilities across the Borough. • Better access to public transport is required in the more rural areas of Bromley, and greater accessibility to London via public transport is necessary across the Borough. • Improved open spaces and recreation facilities are a requirement in certain areas. A particular focus should be on youth facilities in many places. • Give due regard to promoting equality of opportunity for all protected groups, e.g. the elderly.[6]
Economy	• The plan should promote investment to develop high value employment activities that support a knowledge-based economy in Bromley • There is a need to improve the competitiveness of key employment centres, in particular by improving the quality of the office stock in Bromley's town centres. • The plan should maximise the employment and business opportunities available at Biggin Hill in light of its designation as a Strategic Outer London Development Centre. • There is a need to protect and support smaller centres, shops and shopping parades.
Landscape, townscape and cultural heritage	• Landscape character should be protected, in particular that associated with areas of Green Belt and North Kent Downs AONB. • Urban areas and buildings that contribute the most to urban character should be protected. • The Borough's Heritage Assets should be protected and enhanced.
Water, flood risk and other climate change adaptation issues	• Action is needed to reduce the risk of flooding, particularly given increased risks associated with climate change. • Water quality is a concern in the Borough, with efforts needed to improve the ecological status of waterways. • Given the Borough's position in an area of severe water stress, water efficiency measures should be sought.

[6] The Council has a duty to give "due regard" to promoting equality of opportunity for all protected groups when making decisions; and publish information showing how they are complying with this duty. 'Protected groups' are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

4.3 A note on 'equalities' considerations

Equalities

4.3.1 The Council has a duty to give "due regard" to promoting equality of opportunity for all groups with protected characteristics when making policy decisions; and publish information showing how they are complying with this duty. 'Protected characteristics' are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

4.3.2 In the case of the Bromley Local Plan, equalities considerations were not an explicit focus of SA scoping work; however, in-light of an Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA) carried out in 2014[7], the SA scope has now been supplemented with an additional objective under the Community and well-being topic within the SA Framework. As such, the SA process can now be said to 'integrate' EqIA. Equalities issues/impacts are discussed as part of appraisal text within this report.

[7] Bromley Borough Council (2014) EqIA and HIA of the Bromley Local Plan. Prepared by URS (now AECOM).

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1 Plan-making has been underway for a number of years, with four formal consultations having been held (under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) prior to this current consultation (Local Planning Regulation 19), and a number of Interim SA Reports having previously been published.

5.1.2 Rather than recap the entire 'story' in detail, the intention here is to explain the work undertaken in 2016, which led to the development of the Draft Local Plan that is currently the focus of appraisal (see Part 2, below) and is currently published under Local Planning Regulation 19.

5.1.3 Specifically, in-line with regulatory requirements (Schedule 2 of the SEA Regulations), there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account appraisal findings when finalising the draft plan for publication.

5.1.4 This part of the report presents information regarding the consideration of reasonable **alternative spatial strategies**, i.e. alternative approaches to the allocation of land to meet development needs.

N.B. This information is important given the requirements of the SEA Regulations, specifically the requirement to present (within the SA Report) an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

Structure of this part of the report

5.1.5 This part of the report is structured as follows:

Chapter 6 - explains reasons for selecting the alternatives dealt with

Chapter 7 - presents an appraisal of the reasonable alternatives

Chapter 8 - explains reasons for selecting the preferred option.

6 DEVELOPING THE REASONABLE ALTERNATIVES

6.1 Introduction

6.1.1 This chapter explains the work undertaken to develop 'reasonable' spatial strategy alternatives. This chapter:

- explains the **context and background** to alternatives development; and then
- explains the **process followed in 2016** in order to establish reasonable alternatives.

6.2 Context and background

6.2.1 SA work commenced in early 2013, when AECOM (then URS) worked with the Council to establish alternatives for a range of the policy areas / issues set to be addressed through the Local Plan. Ultimately, alternatives were established for 18 issues in 2013, and each set of alternatives was subjected to appraisal at the time of the 'Options and Preferred Strategy' consultation, with findings presented within an Interim SA Report published in March 2013. Specifically, tables 11.1 and 12.1 of the Interim SA Report explained 'outline reasons for selecting the alternatives dealt with' and then section 13 presents alternatives appraisal findings.

6.2.2 Subsequent to the 2013 consultation the Council was able to take into account alternatives appraisal findings (plus consultation responses received on the alternatives) when preparing the 'Draft Policies and Designations' consultation document. In the run-up to finalising the consultation document in 2014 the opportunity was taken to update the alternatives appraisal findings - in relation to the 18 plan issues identified in 2013 - to account for newly emerged evidence.[8] Updated alternatives appraisal findings were then reported within the second Interim SA Report published alongside the 'Draft Policies and Designations' consultation document in February 2014.[9]

6.2.3 Each of the 18 issues that were a focus of alternatives appraisal work in 2013 and 2014 are discussed in turn below.

Housing quantum

6.2.4 The preferred approach in 2014 was to plan to deliver a low growth strategy, specifically a strategy slightly below the London Plan target. The alternatives appraisal served to highlight that this approach performed notably worse than higher growth options in terms of wide ranging 'community and wellbeing' considerations. The current proposal - as set out within the Proposed Submission Draft Local Plan consultation document - is to plan to meet the London Plan target in full as a minimum. This is in line with the current London Plan, which states that Boroughs should seek to achieve and exceed the relevant annual average housing target set out in Policy 3.3.

[8] N.B. as part of the alternatives appraisal 'updating' work ahead of the 2014 consultation the decision was taken to focus on the same 18 sets of alternatives previously considered in 2013, i.e. no additional issues/options were identified as necessitating attention, and none of the issues/options previously appraised were identified as no-longer necessitating attention.

[9] Updated alternatives appraisal findings were also reported within the Interim SA Report published in February 2014 alongside the 'Draft Policies and Designations' consultation document. Specifically, section 12 of the report presented 'outline reasons for selecting the alternatives dealt with', section 13 presented alternatives appraisal findings and then section 14 presented the Council's 'outline reasons for selecting the preferred approach' for each of the 18 issues that had been a focus of appraisal (i.e. it presented the Council's explanation of why the preferred policy approach was deemed to be justified, in light of alternatives).

Housing distribution

6.2.5 It was determined in 2013 (and reaffirmed in 2014) that the question 'on the table' relates to whether there should be a focus on the renewal of existing residential areas or instead a focus on further intensification of existing areas at a higher density. The preferred approach in 2013 was to focus on the renewal of existing residential areas, which includes the Town Centre. This remains the preferred approach. This approach broadly accords with sustainability objectives, i.e. is not associated with any notable drawbacks. It remains the case that the matter of housing distribution is worthy of further consideration, and hence it is discussed below in section 6.3.

Quality/design

6.2.6 The alternatives appraisal in 2013 served to confirm that the Council's preferred approach - of tailoring density and design requirements to the Bromley context - broadly accords with the SA Framework, with the alternative approach of relying on London Plan policy (i.e. the London Plan Density Matrix) generally less preferable. The Council has not significantly amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Affordable housing

6.2.7 The alternatives appraisal in 2013 found all alternatives likely to lead to significant positive effects in terms of community and wellbeing, particularly with regards to housing need and deprivation. Whilst a 40% Borough-wide target on large sites was identified as the best performing option in terms of the delivery of the maximum number of affordable homes, it was noted that this appraisal did not take into account deliverability. The Council has not amended the preferred approach of 35% affordable housing but has updated the policy to reflect the Planning Policy Guidance revision to only seek affordable housing on schemes capable of providing 11 or more homes and to reflect local intermediate housing income thresholds. No evidence has emerged that would indicate a need to revisit the alternatives appraisal findings. The Council's explanation for following the preferred approach (in-light of alternatives appraisal findings) is presented in section 12.2 of the 2014 Interim SA Report.

Identifying areas for renewal

6.2.8 The alternatives appraisal in 2013 found the three alternatives all likely to have significant positive effects in terms of 'community and wellbeing' and 'economy' objectives, with the council's preferred option of adopting a 'place' led approach found to be marginally best in terms of a number of objectives. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Travellers

6.2.9 The Councils' preferred approach - of enabling pitches within existing Local Authority sites and allocating certain existing sites, including some without permanent permissions as Traveller sites - was considered to be broadly best performing through alternatives appraisal in 2013, with no draw-back highlighted. Since this time, further evidence has come forward on the housing needs of these groups.[10] This assessment concluded that the total current need for additional pitches ranges from 11 to 12 pitches and 2 plots; plus an additional 9 to 10 pitches and 2 plots by 2020 to give a five year supply. Given that the Council's preferred policy still includes a criteria based approach to reviewing proposals for new pitches that contribute to meeting this need, a formal revisiting of the alternative appraisal is not seen as being necessary at this time.

[10] LB Bromley (2015) Gypsies & Travellers And Travelling Showpeople Accommodation Evidence Base Paper

Leisure and recreation, play and youth

6.2.10 The alternatives appraisal in 2013 concluded that the Council's preferred approach - of protecting open space provision where it makes an important contribution to the community, and enhancing provision where there is an identified area of deficiency - was broadly best performing from a sustainability perspective, with no draw-backs highlighted. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Parking

6.2.11 The alternatives appraisal in 2013 noted that the Council's preferred approach to parking would likely improve accessibility for rural residents and reduce the risk of 'overspill' parking affecting highway safety, and so was broadly the best performing of the alternatives identified, with no draw-backs identified. Residential parking standards have been amended as part of the Parking Policy and refined in light of responses and the minor alternations to the London Plan providing Outer London Boroughs the ability to provide more generous parking standard in areas of the their Boroughs falling within Public Transport Accessibility Levels 0-1 and parts of PTAL 2. Lower parking provision in areas with greater accessibility to public transport is more likely to encourage a model shift to public transport. The proposed approach seeks conformity with the London Plan as well as reflects evidence and local circumstances. As a result, a formal revisiting of the alternatives appraisal is not seen as being necessary at this time.

Relieving congestion

6.2.12 The alternatives appraisal in 2013 was broadly supportive of the Council's preferred approach of adopting mitigation measures at pinch points, recognising that this approach will allow beneficial development to come through in sustainable and accessible locations at key transport nodes. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Access to services for all

6.2.13 By focussing on the promotion of sustainable transport and improving accessibility by non-car modes, the appraisal of alternatives concluded in 2013 that the Council's preferred approach should lead to significant positive effects in terms of reducing emissions, improving health and reducing social inclusion. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit alternatives appraisal.

Business area designations

6.2.14 The alternatives appraisal in 2013 noted that the Council's preferred approach would likely result in significant positive effects for the economy by preserving Locally Significant Industrial Sites from development to other land uses. Since this time the Council has reviewed and updated the evidence regarding the existing industrial stock in order to ensure there is sufficient industrial land to meet the needs of future businesses.[11] This has led to the proposed designation of 13 Locally Significant Industrial Sites - five of which are existing Business Areas designated in the UDP. As a result, there is not considered to be a need to revisit the alternatives appraisal findings. It should be noted that changes have been made to the Strategic Industrial Location (SIL) policy to clarify consideration of non-industrial uses in the Cray Business Corridor, as well as the dual designation of Cray Business Park as a SIL and an Office Cluster.

[11] LB Bromley (2015) Industrial Land and Premises Update

Development outside business areas

6.2.15 The alternatives appraisal in 2013 confirmed that the Council's preferred approach - a criteria based policy to protect non-designated employment sites from change of use - is to be broadly supported from a sustainability perspective, as it is likely to retain economic activity within the Borough and provide employment opportunities. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Future requirements for office floorspace

6.2.16 The alternatives appraisal in 2013 found two of the options appraised to perform broadly well - both the Council's preferred approach of protecting all existing office floorspace in accessible (based on Public Transport Accessibility Level (PTAL) rating) locations, and the option of restricting new office developments to accessible (based on PTAL rating) town centre locations - before noting that as these options are not mutually exclusive both should be pursued. The Council has not amended the preferred approach since 2013; however, the Council has now determined a need to prepare a new, stand-alone policy on Office Clusters.

6.2.17 The **Office Clusters** policy within the Draft Local Plan consultation document has been drafted in light of ongoing loss of office floorspace in the Borough (resulting from the pressures of other higher value land uses and changes to Permitted Development Rights in May 2013), and informed by a review of the Borough's office stock.[12] The aim of the policy is to safeguard sites for continued office use to meet the employment needs of the Borough. Criteria based on accessibility, total floorspace, vacancy level, and age were used to assess prospective sites, leading to the identification of three areas: Crayfield Business Park, within the Cray Business Corridor; Knoll Rise, Orpington Town Centre; and Masons Hill, Bromley Town Centre. Two of the office clusters are found in local town centres and the fourth forms part of the strategically important Cray Business Corridor. All of the identified clusters have PTAL ratings of 4/5, meaning they have easy access to London Distributor Roads. Further prospective clusters have been discounted on the basis of their dispersal or the positioning of office space above shops. As such, no reasonable alternatives are identified at the current time.

Biggin Hill

6.2.18 It was determined in 2013 (and reaffirmed in 2014) that the Council's preferred approach to Biggin Hill was the strongest performing of the alternatives. The appraisal in 2013 found that this approach would preserve the heritage of the site whilst also allowing for aviation-related use at the East Camp site, contributing to economic activity and jobs in the south of the Borough which is less well served in terms of employment and accessibility. Since this time a number of evidence reports have been commissioned examining the growth potential of the Biggin Hill Strategic Outer London Development Centre (SOLDC)[13] and options for releasing Green Belt land within the SOLDC.

6.2.19 In summary, it is now the case that exceptional circumstances for the amendment of the Green Belt boundary at Biggin Hill are considered to exist as a result of:

- a pressing need for development and realising the potential of the SOLDC exists;
- the inability to meet this need under existing Green Belt policy;
- the absence of alternative non-Green Belt locations in Bromley or London's other airports; and
- the significant economic benefits to Bromley and the wider economy of development.

[12] LB Bromley (2015) Key Office Clusters
[13] URS (2015) Planning for Growth in Bromley: Biggin Hill Study

6.2.20 The Green Belt boundary amendments proposed have been subject to detailed analysis of the five Green Belt purposes. Given the support these evidence based studies provide to the Biggin Hill SOLDC Green Belt Boundary Amendment there is not considered to be any need for further reasonable alternatives appraisal at the current time.

Ensuring the vitality & viability of the Borough's town centres

6.2.21 The alternatives appraisal in 2013 concluded that the preferred approach would likely lead to significant positive effects in terms of health and accessibility to services and infrastructure through enhancing the role of Bromley's district centres and improving provision of leisure and recreation facilities, and no notable draw-backs were highlighted. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Sustainable design and construction

6.2.22 The alternatives appraisal in 2013 found two of the options appraised to perform broadly well - both the Council's preferred approach of capitalising opportunities associated with developments and alterations, and the option of focusing on opportunities associated with major developments - before noting that as these options are not mutually exclusive both should be pursued. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Feasibility in different sizes and types of development

6.2.23 The Council's preferred approach since 2013 has been that major developments should aim to achieve a minimum additional carbon reduction in line with the relevant London Plan policy. The alternatives appraisal in 2013 found that the alternative option performed best as it required all new development schemes to be screened in order to assess the feasibility and viability for carbon reductions. It is important to note that the alternatives appraisal did not identify any significant draw-backs for either of the options. Since then, the preferred approach has been amended to reflect changes to the London Plan. No evidence has emerged that would indicate a need to revisit the alternatives appraisal findings.

Incorporating renewable energy into new development

6.2.24 The alternatives appraisal in 2013 noted that the Council's preferred option - of ensuring that all major developments include renewable energy generation on-site to account for a minimum of 20% of the total carbon reduction - would lead to a significant positive effect in terms of generating renewable energy to offset emissions. At the same time, it found that the alternative approach (enabling offsite measures) would deliver similar benefits. As a result, the appraisal recommended bringing the two alternatives together into a hybrid approach would allow greater flexibility and would have a greater chance of securing renewable energy generation. The Council has not amended the preferred approach since 2013, and no evidence has emerged that would indicate a need to revisit the alternatives appraisal findings. The Council's explanation for following the preferred approach (in-light of alternatives appraisal findings) is presented in section 12.2 of the 2014 Interim SA Report. It should be noted that the incorporation of renewable energy into new development forms one part of the Council's strategy for reducing carbon emissions.

6.3 Developing reasonable alternatives in 2016

Introduction

6.3.1 Building on the work carried out in 2013/14 the Council and AECOM worked together to develop *spatial strategy* alternatives, in recognition of the fact that it is the spatial strategy - i.e. the approach to site allocations - that is the key issue at the heart of the plan. It is the issue which generates the most interest, and (in the view of AECOM) is the element of the plan that is most likely to result in 'significant effects on the sustainability baseline'. The aim of this section is to explain this work, and in doing so explain 'outline reasons' for selecting or rejecting alternatives.[14]

6.3.2 While the focus of this section is on the identification and appraisal of spatial strategy alternatives; consideration has also given to potential alternatives for meeting education needs in the Borough. Evidence published in 2015 and updated in 2016 suggest that the need for school places is increasing and that there are issues in relation to the capacity of education facilities. This is considered further below.

Education

6.3.3 The capacity of education facilities within the Borough was identified as a key issue in the early stages of plan-making within the Core Strategy Issues Document published in 2011. Subsequently, the development of the Local Plan has run in parallel with reports to the School Places Working Party, which have tracked the markedly sharp increase in demand for school places.

6.3.4 The Council's Primary and Secondary School Development Plans (published in January 2015 and updated in January 2016) set out the identified need for school provision in the Borough during the life of the Local Plan. In line with the NPPF and London Plan, the Council must ensure provision of an appropriate range of educational facilities by assessing the need over the plan period and allocating sites accordingly.

6.3.5 The Local Plan Draft Policies and Designations consultation document (Feb 2014) involved a 'Call for Sites' for a range of uses, including education. Alongside sites submitted through the 'Call for Sites', the Council considered sites proposed by Free School providers and other vacant education and social infrastructure sites. In light of recent developments on "restricted" sites" sites below 5,000 sqm were not generally considered reasonable, given national guidelines. It should be noted that one site below the 5,000 sqm threshold was assessed by the Council as it is in a highly accessible location and proposed by a free school provider.

6.3.6 Sites were then assessed by the Council, in line with the approach to social infrastructure and specifically education, set out in London Plan Policies 3.16 and 3.18, and ranked according to performance:

A. Site presents a realistic opportunity for school development. N.B. whilst proposals could be policy compliant more extensive development would be dependent upon Urban Open Space (UOS) policy changes and designations in the emerging Local Plan being successfully taken through to adoption.
B. Site offers potential, however, may be required to provide for other strategic needs within the Local Plan; or involve the allocation of UOS that is inaccessible to the public (long term); or require the re-designation from Green Belt or Metropolitan Open L following the demonstration of 'exceptional circumstances'.
C. Site problematic due to a range of strategic policy and/or site specific constraints, the mitigation of which could affect deliverability, but in the absence of sufficient A & B sites may be considered.
D. Site not considered realistic due to a range of site specific issues (e.g. size, flood risk) and strategic policy limitations including associated with the protection of employment land and

[14] Regulations require appraisal of 'reasonable alternatives' and reporting of 'outline reasons for selecting the alternatives dealt with'.

open spaces (notably the need to maintain the integrity of Green Belt / MOL and the robustness of boundaries).

6.3.7 The assessments were informed by a range of Local Plan background papers (residential site assessments, industrial land assessments), and the assessment of Green Belt / MOL boundaries at existing primary School Sites and secondary school sites. The method and detailed findings of this work were presented in the Education Background Paper published in September 2015.

6.3.8 The Education Background Paper (2015) demonstrated that collectively the A ranked sites were insufficient to address the identified needs and it was therefore necessary to consider B ranked sites. Following the consideration of B ranked sites it was clear that needs would still not be met. With outstanding need remaining, and having exhausted all other options, the Council recognised that 'exceptional circumstances' exist that provide the justification to consider the re-designation of existing schools within Green Belt / MOL to facilitate development which would normally be 'inappropriate' under the NPPF.

6.3.9 Informed by the findings of the Education Background Paper (2015) the Draft Allocations, Further Policies and Designations Document (September 2015) proposed a range of approaches to address the education needs over the plan period, specifically through:

- The assessment of the capacity of existing sites (including redundant social Infrastructure and other policy compliant sites in addition to the existing education);
- Policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational premises;
- Appropriate re-designation of existing school sites from Green Belt and Metropolitan Open Land to UOS; and
- Specific site allocations (with re-designations where required).

6.3.10 Since consultation on the Draft Allocations, Further Policies and Designations Document ended in October 2015, the Education Background Paper has been updated to reflect updated need, representations from the 2015 consultation, the consideration of Councillors, as well as additional sites. It reaffirms the conclusions of the 2015 Education Background Paper that there are exceptional circumstances for the release of sites from Green Belt and MOL.

6.3.11 The implication is that a clear preferred approach has emerged through detailed work, and a sequential approach to considering sites. There is no justification for appraising alternative approaches.

Spatial Strategy

6.3.12 When developing spatial strategy alternatives, there is inevitably a need to give consideration to 'top down' / strategic factors ('drivers') alongside 'bottom up' (i.e. site specific) factors. As such, top-down and bottom-up factors are considered in turn below, before a final section draws the various factors together in order to establish reasonable alternatives.

N.B. As part of the discussion of bottom-up factors consideration is given to the **site options appraisal** work completed by the Council in 2014/15. The discussion serves to demonstrate that site options appraisal work 'integrated' SA.

Strategic ('top down') considerations

6.3.13 Primarily considerations are: 1) London Plan policy, and in particular the housing target established by the Further Alterations to the London Plan (FALP, March 2015); and 2) the Strategic Housing Market Assessment (SHMA) for the South-East London sub region (2014).

The London Plan

6.3.14 Revisions to the London Plan (FALP) have a number of implications for Bromley, but most notable is the new housing target of 641 dwellings per annum (dpa). This is a considerable increase on the previous target of 500 dpa, which was used as the basis for establishing the spatial strategy in 2014. Other notable changes to the policy context implemented through the FALP include designation of Bromley Town Centre as an Opportunity Area and identification of Crystal Palace as a potential Strategic Outer London Development Centre (SOLDC).[15] These factors may have implications for the spatial strategy, as economic growth in these areas could potentially be supported by housing growth that meets identified needs. It is also noted that the FALP has implications for neighbouring Croydon - establishing more ambitious growth targets and reaffirming the role of Croydon as an Opportunity Area.

The South-East London sub region SHMA

6.3.15 A SHMA for the South-East London sub region was finalised in June 2014, establishing that there is a need to deliver approximately 7,200 dpa across the sub-region if objectively assessed housing needs (OAHN) are to be met. This is to meet requirements of future household growth as well as alleviate current unmet demand by catering for existing households currently lacking their own accommodation.

6.3.16 The SHMA also identifies that there is a need for 5,000 of these homes (i.e. 70%) to be affordable (i.e. available at below market rates for those able to demonstrate need). Delivery of 70% affordable housing is clearly unrealistic, and hence this suggests a need to consider delivering more than 7,200 dpa (e.g. delivering 15,000 dpa would mean that only 30% of new homes would need to be affordable in order to meet needs in full).[16]

6.3.17 The SHMA identifies that within Bromley there is a need to deliver approximately 1,300 dpa in order to meet OAHN. The SHMA also identifies that there is a net annual affordable housing need of 1,404 units per annum. This suggests a need to consider - no matter how unrealistic given other policy objectives - the possibility of delivering more than 1,300 dpa, in order to more fully meet affordable housing needs.

Capacity ('bottom-up') considerations

Identifying site options

6.3.18 Potential development sites for housing (and housing mixed with other uses) have come forward from a number of different sources and activities undertaken during the process of developing the Core Strategy and Local Plan. The first representations regarding sites were submitted in response to the Core Strategy Issues consultation in 2011 and the Options and Preferred Strategy consultation in 2013. These were taken into account and then added to by a formal Call for Sites in 2014 alongside the Draft Policies and Designations document. In addition, particular landowners that regularly review their property assets were approached, including the Council, the NHS, Network Rail and Royal Mail. Work on other aspects of the Local Plan has also prompted further investigation of potential areas or specific sites through, for example, the assessment of employment and business land.

[15] A SOLDC is an area with specialist strengths already or with the potential to function above the sub-regional level and to generate growth above the Outer London trend without competing against existing town or other centres.

[16] Planning Practice Guidance states that: *"The total affordable housing need should… be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."*

Appraising site options

6.3.19 All sites put forward for housing development have been subject to criteria-based analysis, informed by desk-top review and site visits where required. This has enabled an understanding of the issues and opportunities at each site, and ultimately a view to be formed in the suitability of each site for allocation within the plan.

6.3.20 Specifically, the merits of all sites options have been established subsequent to appraisal against criteria under the following headings:

- open space and natural environment;
- flood risk and drainage;
- pollution;
- heritage, character and landscape;
- accessibility and community facilities;
- transport and infrastructure;
- business and employment; and
- other issues highlighted by review of existing uses and features of the site and surrounds.

6.3.21 Further information on the specific criteria/issues that were taken into account under each of these broad headings is presented in **Appendix III**.

6.3.22 Essentially, the outcome was completion of a 'proforma' for each site, and the completed proformas are available at:

http://www.bromley.gov.uk/info/1004/planning_policy/153/developing_bromley_s_local_plan

6.3.23 From a review of the methodology and completed proformas it is apparent that the process of site options appraisal can be seen to have integrated SA. A review of the SA framework (see table 4.1, above) does not highlight any additional criteria that should necessarily have been applied, or issues that should necessarily have been taken into account.

6.3.24 Whilst the methodology might ideally have reflected additional criteria/issues - e.g. in relation to landscape/townscape/heritage considerations - it is recognised that the methodology needed to be pragmatic, i.e. reflect the evidence-base available and the need to ensure consistency of appraisal ('a level playing field'). For example, pragmatic considerations meant that it was not possible to employ a specialist to visit all site options in order to explore landscape/townscape/heritage issues, and hence the appraisal primarily relied on querying the proximity of site options to Listed Buildings and Conservation Areas. There was some potential to supplement understanding drawing on information provided by site promoters; however, caution needed to be applied in order to ensure a level playing-field.

Site options appraisal findings

6.3.25 Of the 69 site options appraised the Council has determined to allocate 13. The 56 non-preferred site options are not categorised further in terms of their relative merits within this SA Report; however, from an investigation of the completed site appraisal proformas it is apparent that some are more constrained than others.

Developing the reasonable alternatives

6.3.26 Given the SHMA findings, and given that the London Plan target is a minimum figure, there is a 'reasonable' need to test the option of delivering above the London Plan target as well as the option of delivering the London Plan target as a minimum (i.e. the Council's preferred approach). In other words, there is a need to appraise at least two spatial strategy alternatives.

6.3.27 It could be argued that there is a need to test the option of delivering below the London Plan target, given the environmental sensitivities that exist (and recognising that the strategy in 2014 was to deliver a figure slightly below the target); however, this would not appear to be a 'reasonable' option worthy of detailed consideration (appraisal) at the current time. A strategy delivering a housing figure below the London Plan minimum target would not be in 'general conformity' with the London Plan and could only be pursued through Duty to Cooperate agreements (i.e. the Council would need to demonstrate that any shortfall could be met by neighbouring authorities). This conclusion on 'unreasonableness' is also supported by the Council's site options appraisal work, which identifies capacity to deliver the London Plan target, and does not identify any preferred sites that have notable draw-backs / would not be allocated in an ideal world.

6.3.28 Having established that there is a need to test at least two growth quantum alternatives, there is a need to consider the questions:

1) What is a 'reasonable' higher growth option to test?
2) Is there a need to consider alternative distributions of housing growth?

What is a 'reasonable' higher growth option to test?

6.3.29 It appears certain that the option of delivering a level of housing growth approaching that necessary to meet the SHMA objectively assessed housing needs figure (even before any account is taken of the possibility of 'uplifting' the figure in order to better meet affordable housing needs) is unreasonable. There would be major conflicts with national and regional policy relating to issues such as protection of Green Belt, open space (Urban Open Space and Metropolitan Open Land) and employment land (even recognising the potential for mixed use redevelopment of employment sites to lead to an increase in employment floorspace).

6.3.30 Government policy dictates that Green Belt release is only possible in exceptional circumstances, and it seems unlikely that housing need alone would lead to the exceptional circumstances whereby significant Green Belt release in Bromley is justified. Rather, there is clearly a need for any significant alterations to the Green Belt to be made through the London Plan, i.e. subsequent to high level, strategic consideration of options. As stated within the Further Alterations to the London Plan (FALP) Inspector's report:

"Once adopted, statute will require the local plans produced by London Boroughs to be in general conformity with the FALP. That includes conforming with a strategy which seeks to meet London's needs on brownfield land within the existing built up area. The [Strategic Housing Land Availability Assessment, SHLAA] identifies most of the existing capacity and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London. Within the confines of the FALP's strategy there is little scope to do more."

6.3.31 Although it may not be possible to deliver housing growth capable of meeting the SHMA objectively assessed housing needs figure, there is nonetheless the possibility of exceeding the London Plan target to some extent; indeed, it can be argued that there is a need to do so. This is on the basis that the FALP target is a minimum, which in turn reflects the fact that the FALP target relates to capacity rather than OAHN. Specifically, the FALP target of 42,000 dpa across London is driven by the Mayor's SHLAA, whilst objectively assessed housing need for London, as established by the Mayor's SHMA (2013), is 49,000 dpa (i.e. 17% higher than the target).

6.3.32 As such, it would seem reasonable that authorities should explore exceeding the FALP target - drawing on capacity over and above that which it was possible to identify through the London-wide SHLAA - in order to contribute to a situation whereby London's housing needs are more fully met.

6.3.33 There is also a need to consider the potential for an increased quantum of housing to support the economic growth ambitions of the Borough, in particular within Bromley Town Centre Opportunity Area (OA), the Cray Business Corridor, and the Strategic Outer London Development Centre (SOLDC) at Biggin Hill. It could be argued that economic growth in these areas will lead to greater demand for housing, whilst in turn the provision of new housing would support these economic centres.

Is there a need to consider alternative distributions of housing growth?

6.3.34 The preferred approach to distributing housing is primarily driven by site specific considerations (i.e. the consideration of site options in isolation, 'on their merits'), although top-down / strategic considerations also have a bearing, most notably the strategy of supporting growth at the Bromley Town Centre OA, the Cray Business Corridor, and the SOLDC at Biggin Hill. This strategy is strongly justified, and it would not appear that there is a ('reasonable') need to consider alternative approaches to distributing the London Plan target.

6.3.35 If an increased quantum of housing were to be delivered, one option would certainly be to apply precisely the same spatial strategy. Another option would be to deliver additional housing solely at the opportunity/growth areas (so that the overall effect is to deliver housing in a more concentrated fashion). As discussed, it can be argued that housing focused at these areas would be supportive of economic growth objectives.

Establishing the reasonable alternatives

6.3.36 There is a 'reasonable' need to appraise two alternative housing quantum figures: one that would involve delivering the London Housing Plan target of 641 dpa; and another that would involve delivering a higher figure. It is not possible to define a higher growth figure specifically. For the purpose of appraisal the Council agreed to use 750 dpa.

6.3.37 In terms of spatial distribution, the preferred strategy would seem broadly appropriate for delivering 641 dpa, but under a higher growth scenario it seems reasonable to consider a slightly modified strategy; specifically, one whereby housing is focused to a greater extent at the Borough's strategic growth areas, including the proposed SOLDC at Crystal Palace.

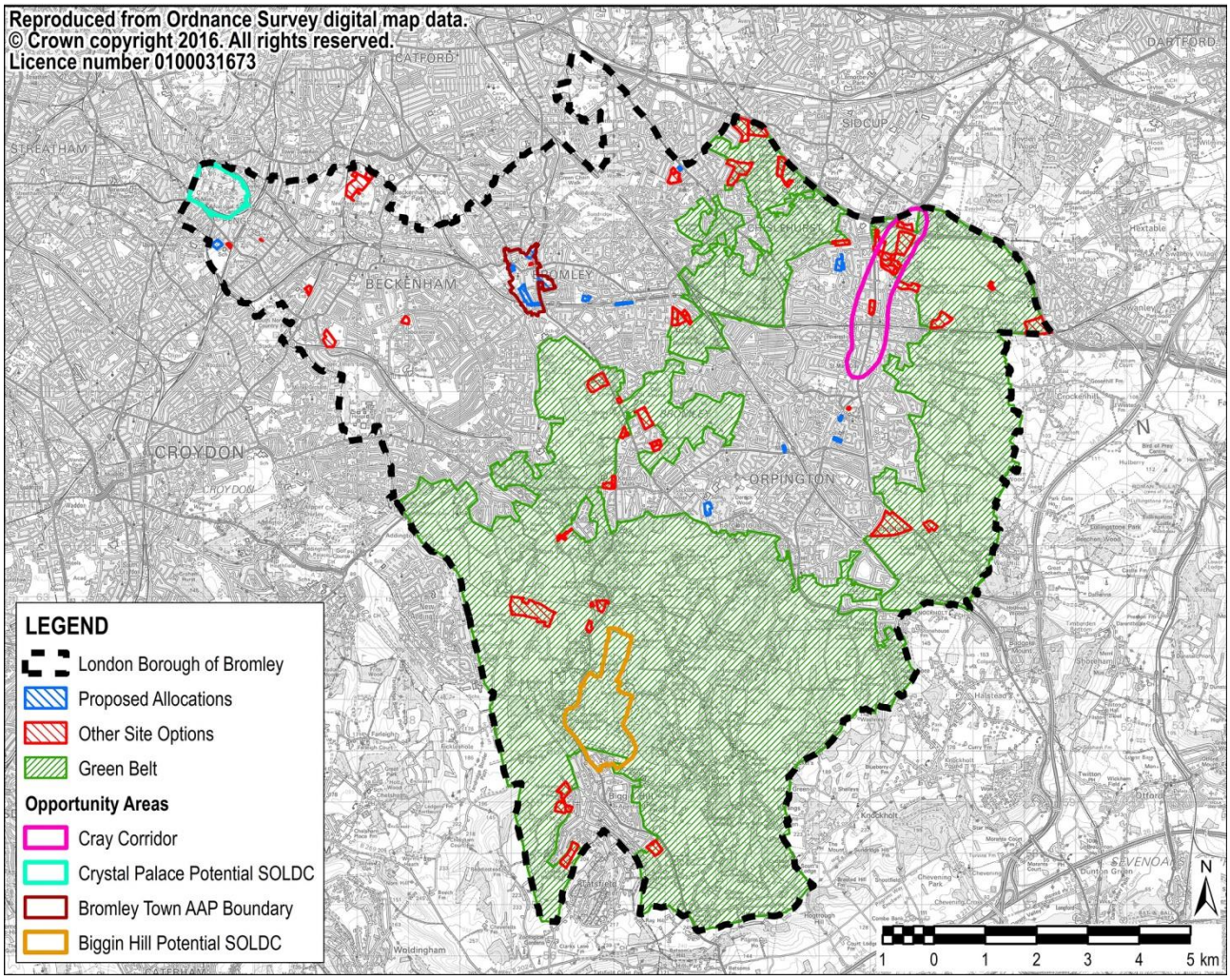
6.3.38 Ultimately, two reasonable spatial strategy alternatives were established:

1) London Plan target as a minimum, delivered in-line with the preferred spatial strategy (i.e. the Council's preferred option)

2) Higher growth strategy, with additional housing focused at the Borough's strategic economic growth areas.

6.3.39 It is not possible to define the specific additional sites (i.e. sites over and above those proposed allocations presented within the current consultation document) that would be delivered under option 2, but it is likely that they would be selected from the pool of site options that have been subjected to appraisal by the Council - see **Figure 6.1**.

Figure 6.1 Housing site options within Bromley - showing the Council's preferred sites and those that could potentially come into contention under a higher housing growth scenario



7 APPRAISAL REASONABLE ALTERNATIVES

7.1 Introduction

7.1.1 The aim of this Chapter is to present an appraisal of the two reasonable spatial strategy options introduced in Chapter 6.

7.2 Appraisal methodology

7.2.1 For each of the options, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability themes / objectives / issues identified through scoping (see Part 1) as a methodological framework. **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects.

7.2.2 Effects are predicted taking into account the criteria presented within SEA Regulations.[17] So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects is also a consideration.

7.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make certain assumptions regarding how each option will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

7.2.4 In some instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

[17] Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

7.3 Appraisal findings

7.3.1 Summary appraisal findings are presented below, whilst detailed appraisal findings are presented in **Appendix IV**.

7.3.2 To reiterate, for each sustainable topic, the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise performance in terms of 'significant effects' (using **red** and **green** shading). Also, ' **=** ' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them); and ' **-** ' is used to denote instances where the objective in question is not applicable.

Table 10.1: Summary appraisal findings - Alternative approaches to housing policy

Topic	Option 1 London Plan target as a min – delivered in-line with the preferred spatial strategy	Option 2 Higher growth strategy – with additional housing focused at the economic growth areas
Biodiversity	1	2
Climate change mitigation	1	2
Community and well-being	2	1
Economy	2	1
Landscape, townscape and cultural heritage	1	2
Water, flood risk and other climate change adaptation issues	1	2

Looking across the appraisal findings it is clear that **Option 1** [London Plan target] ranks highest in a number of respects, namely in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk. By meeting the minimum target for housing delivery target set by the Further Alterations to the London Plan (2015), this option should also lead to significant positive effects in terms of community and wellbeing, including on the basis that it would support regeneration within the Borough's renewal areas.

The pursuit of **Option 2** (higher growth) could lead to greater negative effects in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk, given the likelihood of additional land take. However, these impacts could be reduced through a balanced spatial strategy, with housing density increased in suitable areas (e.g. through a review of the Bromley Town Centre AAP) and areas of designated open space (UOS/ MOL and Green Belt) carefully selected. Where negative impacts cannot be avoided through such a spatial strategy, mitigation measures could be utilised, such as the restoration of wildlife features or the installation of Sustainable Drainage Systems (SuDS). Importantly, by exceeding the FALP 2015 minimum target through a balanced spatial strategy and mitigation measures, **Option 2** would be likely to deliver significant positive effects in terms of addressing the Borough's need for new and affordable housing, and its economic growth ambitions in the SOLDCs, at Cray Valley and within Bromley Town Centre.

8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for developing the preferred strategy in-light of alternatives appraisal.

8.2 The Council's outline reasons

8.2.1 The Council considers that Option 1 is the more sustainable strategy given the likely adverse impacts that would arise from a higher growth option proposed through Option 2.

8.2.2 Paragraph 14 of the NPPF states that:

> *"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
> - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
> - *specific policies in this Framework indicate development should be restricted".*

8.2.3 The footnote to Para 14 gives examples of such restrictive policies including Green Belt and Local Green Space.

8.2.4 In turn, the London Plan reflects the NPPF - whilst it encourages Boroughs to exceed their annual housing supply targets, it also contains policies to protect open space and the natural environment.

8.2.5 The Council's strategy has been to protect open space wherever possible, but it has agreed some change to provide for needs which are not able to be met elsewhere, notably for Traveller sites (in accordance with central government policy), for education land (in order to meet identified local needs) and at Biggin Hill Airport (to allow airport related economic growth). The evidence base shows exceptional circumstances exist in these cases – i.e. there are no other reasonable alternatives and that the harm caused by the changes is demonstrably outweighed by the benefits.

8.2.6 In terms of housing, the Council demonstrates, through its housing trajectory, that it can meet the annual London Plan housing target (with a buffer included) over the life of the plan. Achieving a higher target (and proving deliverability) would require additional land allocations and the release of either designated industrial land or open space (or both) – which is contrary to the Council's overall strategy.

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 This section of the SA Report presents appraisal findings in relation to the Draft Local Plan. It builds upon the SA work carried out in 2014 that was presented in Part 3 of the Interim SA Report which was published in February 2014.

9.2 Methodology

9.2.1 The appraisal identifies and evaluates the 'likely significant effects' of the Draft Local Plan on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Chapter 4, above) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

• Biodiversity • Community and well-being • Landscape, townscape and cultural heritage	• Climate change mitigation • Economy • Water, flood risk and other climate change adaptation issues

9.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Draft Local Plan in more general terms.

9.2.3 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.[18] So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Draft Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. Explicit reference is made within the appraisal as appropriate (given the need to balance the desire of systematic appraisal with a desire to ensure conciseness/accessibility).

Adding structure to the appraisal

9.2.4 Although, under each of the six topic heading, there is a need to focus on the effects of the draft plan - 'as a whole', it is helpful to break-up the appraisal and give stand-alone consideration to the various components of the draft plan. As such, each of the six draft plan appraisal narratives is broken-up under the following headings:

- Spatial Strategy
- Living in Bromley
- Supporting Communities
- Getting Around
- Bromley's Valued Environments
- Working in Bromley
- Environmental Challenges
- The draft plan 'as a whole'

9.2.5 As such, the appraisal below is presented as 54 (6 x 8) separate appraisal narratives. Within each narrative, reference is made to specific policies/proposals as relevant.

9.2.6 Finally, efforts are made within the appraisal narratives to highlight those draft policies that are a particular focus of consultation at the current time, i.e. those policies discussed within the current Draft Local Plan.

[18] Environmental Assessment of Plans and Programmes Regulations 2004

10 APPRAISAL OF THE PROPOSED DRAFT LOCAL PLAN

10.1 Biodiversity

Spatial Strategy

10.1.1 The spatial strategy seeks to improve existing built areas and as such should not lead to significant negative effects in terms of biodiversity. A focus of the spatial strategy is also to protect and enhance the Borough's varied open spaces and natural environment. It should be noted that there are a number of Sites of Importance for Nature Conservation (SINCs) in and around some of the areas where growth is directed as well as a SSSI situated in the north of the Cray Business Corridor. However, it is anticipated that any significant impacts on biodiversity will be avoided or mitigated in light of the wider policies in the Plan that are focused on wildlife protection (e.g. **Draft Policy 72** on Protected Species).

Living in Bromley

10.1.2 **Draft Policy 1** (Housing Supply) makes provision for a minimum of 641 additional homes per annum. This is likely to result in an increased land take of brownfield land, which may hold biodiversity value of significance (whether designated or otherwise); these sites may also contribute to wider green infrastructure services such as reducing urban heat island effects and reducing surface water run off rates. Additionally, the increase in housing supply will result in an increased population. This in turn may increase pressure on biodiversity sites through increased demand for leisure and recreation. Potential for a long-term negative effect the significance of which will be dependent on the mitigation provided through other plan policies. The Bassets Campus and Civic Centre allocations both contain a SINC; however, if development in these areas is avoided then the potential for effects will be reduced.

10.1.3 **Draft Policy 3** (Backland and Garden Land Development) will provide greater protection for garden habitat (containing natural habitats) from development. This may result in minor positive effects for biodiversity.

10.1.4 **Draft Policy 13** (Renewal Areas) focuses housing and regeneration at 'Renewal Areas' which should restrict the loss of land for biodiversity as most development will take place in existing urban areas, which could have a positive effect for biodiversity. Of particular note is **Draft Policy 16** (Bromley Common Renewal Area) which specifically mentions the need for green infrastructure at the Hayes Lane/Homesdale Road/A21 Junction with Bromley Common. Additionally **Draft Policy 17** Cray Valley Renewal Area, outlines an aim to *"protect and enhance the green wildlife corridor along the River Cray".*

Supporting Communities

10.1.5 **Draft Policy 24** (Allotments and Leisure Gardens) seeks to safeguard and expand provision for allotments. While the primary aim of allotment provision is for health and well-being of communities there are likely to still be minor positive effects for biodiversity through retention and expansion of such allotments.

10.1.6 **Draft Policy 29** (Education Site Allocations) proposes a number of allocations for the extension of or new education facilities. Development at some of these sites will result in the loss of green/open space that may have biodiversity value or contribute to wider green infrastructure services; however, at this stage the biodiversity value of these sites is unknown.

Getting Around

10.1.7 The policies in this chapter seek to reduce the demand for transport and promote the uptake of sustainable transport. This should have the effect of reducing emissions from transport with subsequent benefits in terms of air quality. Although it is not possible to determine direct links between air quality and its effect on biodiversity within Bromley; it is likely such improvements are likely to result in long-term positive effects for local biodiversity. Additionally, reduced transport movements would likely reduce noise levels that may disturb wildlife.

Bromley's Valued Environments

10.1.8 It is **recommended** that **Draft Policy 37** (General Design of Development) should expect all development proposals to positively contribute to biodiversity and green infrastructure.

10.1.9 **Draft Policy 49** (The Green Belt) gives significant protection to designated Green Belt land in the Borough by limiting the type of development that can take place there except in 'very special circumstances'. **Draft Policy 50** (Metropolitan Open Land) applies the same level of policy protection to Metropolitan Open Land that is given to land in the Green Belt. **Draft Policy 51** (Land Adjoining Green Belt of Metropolitan Open Land) seeks to prevent detrimental effects from development on the nature conservation value of land in the Green Belt and in Metropolitan Open Land. While these are not biodiversity designations the policies will help to protect areas of open space and greenfield land and have the potential for minor long-term positive effects on biodiveristy.

10.1.10 **Draft Policy 54** (South East London Green Chain) seeks to protect the character and function of the Green Chain route from development and requires the planting of additional vegetation and improved habitat along the route which should have long-term positive effects for the movement of flora and fauna. Existing open and green space will be retained and enhanced through **Draft Policies 55** (Urban Open Space) and **56** (Local Green Space) - the latter being a new designation for important open space to the community.

10.1.11 **Draft Policy 57** (Outdoor Recreation and Leisure) and **Draft Policy 58** (Outdoor Sport, Recreation and Play) seek to protect sport and recreation facilities from development and enhance their provision. This should lead to greater open space provision that would have indirect positive effects on biodiversity. **Draft Policy 59** (Public Open Space Deficiency) commits the Council to secure improvements in open space provision in areas of deficiency.

10.1.12 **Draft Policy 67** (Minerals Workings and Associated Development) requires developers to restore minerals sites to an appropriate Green Belt use when extraction is complete.

10.1.13 **Draft Policy 68** (Development and SSSI) and **Draft Policy 69** (Development and Nature Conservation Sites) seek to protect SSSIs, LNRs, SINCs and RIGs from development as these are the most important sites for biodiversity and geodiversity in the Borough. **Draft Policy 70** (Wildlife Features) will require any damage or loss of non-designated habitat or wildlife feature to be mitigated against or replaced. It is **recommended** that this policy is strengthened by requiring 'no net loss' of habitat as this will increase the total amount of space for biodiversity.

10.1.14 **Draft Policy 71** (Additional Nature Conservation Sites) will provide further protection and active management for new sites that are identified as being of nature conservation interest.

10.1.15 **Draft Policy 72** (Protected Species) seeks to protect priority species listed in the Wildlife and Countryside Act 1981 from development that would adversely affect them, and to ensure sufficient migration measures are employed to manage this.

10.1.16 **Draft Policy 73** (Development and Trees) requires consideration of the wildlife habitat of existing trees and states the intention to use Tree Preservation Orders to protect trees of environmental importance and visual amenity. It is likely to have positive effects for biodiversity especially in light of the council's intention for any replanting to occur with native species.

10.1.17 The Council is committed to improving the provision and management of trees and woodlands through **Draft Policy 74** (Conversation and Management of Trees and Woodlands). Hedgerows affected by development will require to be replaced with native hedgerow species through **Draft Policy 75** (Hedgerows and Development).

10.1.18 **Draft Policy 76** (Kent Downs AONB) should help to safeguard flora and fauna associated with the AONB and its setting. The effects of this will be added to by **Draft Policy 77** (Landscape Character and Quality) which will seek to restore and enhance the local landscape.

10.1.19 **Draft Policy 78** (Green Corridors) will seek to protect green corridors against adverse impacts from development and will also support their enhancement and management.

10.1.20 **Draft Policy 79** (Biodiversity and Access to Nature) seeks to enhance existing biodiversity and address deficiencies in access to nature through the provision of new space.

10.1.21 **Draft Policies 68 to 79** will all have long-term positive effects on biodiversity.

Working in Bromley

10.1.22 The policies in the 'Working in Bromley' chapter seek to direct the majority of new development to existing settlements and employment areas in a hierarchy which should reduce the need to develop land of biodiversity importance.

10.1.23 **Draft Policy 80** (Strategic Economic Growth) identifies three priority areas for economic growth: Bromley Town Centre; the Cray Commercial Corridor and the Biggin Hill Strategic Outer London Development Centre. **Draft Policy 81** (Strategic Industrial Locations) supports the intensification and upgrading of the Cray Business Corridor. This area includes the Ruxley Wood and Ruxley Gravel Pits SSSI. While it is acknowledged that the policy does not support additional land take for employment development, the policy does support intensification which could adversely affect biodiversity at the sites. It should be noted that the A20 Sidcup Bypass runs between the two sites so additional disturbance is not likely to be significant.

10.1.24 **Draft Policy 103** (Biggin Hill SOLDC) and associated policies **105** (West Camp), **108** (East Camp) and **106** (South Camp) seek to promote employment development adjacent to SINC sites and in the vicinity of Saltbox Hill SSSI. Additional development at these locations has the potential to lead to negative effects on the integrity of the SSSI and SINCs.

Environmental Challenges

10.1.25 Policies **115** (Reducing Flood Risk) and **116** (Sustainable Urban Drainage Systems) should have minor positive effects on biodiversity by reducing pollution in water bodies.

10.1.26 Policies relating to pollution including **118** (Contaminated Land), **119** (Noise Pollution), **120** (Air Quality) and **122** (Light Pollution) should have long-term minor positive effects on biodiversity through reducing different types of pollution in the wider environment. **Draft Policy 123** (Sustainable Design and Construction) requires development proposals to demonstrate that the principles of sustainable design and construction have been taken into account; this includes the promotion and protection of biodiversity and green infrastructure.

The preferred approach 'as a whole'

10.1.27 The policies in the plan offer a high level of protection for designated and non-designated sites of biodiversity importance and seek to improve provision where possible. Whilst some allocations and identified areas for strategic growth contain or are in close proximity to designated biodiversity, including SINCs and SSSIs, the most sensitive areas of the Borough are avoided and there is suitable mitigation provided through Draft Local Plan policies.

10.1.28 Employment growth is planned at Biggin Hill and the Cray Valley Business Corridor which are within close proximity to a SSSI, a SINC, and Ancient Woodland. Intensification at these sites has the potential to lead to negative effects; however other policies set out in the 'Bromley's Valued Environments' chapter, including: Draft Policies 68 Development and SSSI**,** 69 Development and Nature Conservation Sites**,** 72 Protected Species, 71 Additional Nature Conservation Sites, should mitigate these effects sufficiently.

10.1.29 On balance, it is appropriate to conclude **neutral effects** at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline. Development proposed in the Draft Local Plan combined with development proposed in surrounding Local Authorities could have a cumulative effect on biodiversity; however, the nature and significance of this effect is uncertain at this stage. Negative cumulative effects are most likely to arise as a result of the fragmentation of habitats and ecological corridors as well as increased atmospheric pollution. The mitigation provided through Local Plan policies and available at the project level should ensure that cumulative negative effects are not of significance. Conversely, there is also the opportunity for development to have cumulative positive effects through the enhancement of habitats and provision of green infrastructure. Where possible, any opportunities to enhance biodiversity either within the Borough or across Local Authority boundaries should be explored.

10.2 Climate change mitigation

Spatial Strategy

10.2.1 The Spatial Strategy is to focus housing development at existing urban areas in accordance with the settlement hierarchy. The main employment growth will occur at existing areas also; although growth at Biggin Hill is somewhat isolated from the rest of the Borough. Overall, growth is being focussed in those areas of the Borough with better access to public transport and services/facilities, which should help to encourage the use of sustainable transport and reduce the need to travel. This may in turn help to reduce per capita GHG emissions and have long-term positive effects on climate change. However, the growth proposed will inherently involve an increase in overall GHG emissions and therefore has the potential for negative effects the significance of which is uncertain at this stage.

Living in Bromley

10.2.2 **Draft Policy 1** (Housing Supply) seeks to provide a minimum of 641 new housing units across the proposed allocations; town centre renewal and the development of housing in Renewal Areas. Focusing development at existing urban areas should help to reduce the need to travel as well as promote travel by sustainable modes of transport which should lead to reductions in transport-related emissions. The policy also supports the conversion of properties and vacant properties being brought back into use which would minimise the use of construction materials and likely improve the efficiency of the dwelling stock thereby reducing emissions. This is significant given that the Borough has one of the highest carbon footprints in Greater London due to its car dependency and older, less efficient dwelling stock. Ultimately, the delivery of 641 new dwellings per year along with associated infrastructure will result in an increase of overall GHG emissions with the potential for a long-term negative effect on climate change. Mitigation provided through other Draft Local Plan policies should help to ensure that the residual negative effect is minor.

10.2.3 **Draft Policy 4** (Housing Design) requires the design of new developments to give priority to pedestrians and cyclists over the movement and parking of vehicles which should further support modal shift and have a long-term positive effect on climate change.

10.2.4 **Draft Policy 10** (Conversion of non-residential buildings to residential) permits redundant buildings to be converted to residential use (subject to conditions) which should help to minimise resource use.

10.2.5 **Draft Policy 13** (Renewal Areas) seeks to maximise opportunities for regenerating existing communities, deliver new housing and improve accessibility and transport connectivity which should help to reduce domestic emissions and emissions from transport in these areas.

Supporting Communities

10.2.6 **Draft Policy 20** (Community Facilities) requires new community facilities to be located in areas that maximise accessibility and the opportunity for users to use sustainable transport. **Draft Policy 26** (Health and Wellbeing) encourages opportunities to support and enhance health and well-being, physical activity and facilities to be accessible by public transport. These policies have the potential for a minor positive effect.

Getting Around

10.2.7 **Draft Policy 30** (Parking) makes provision for electric vehicle charging points which should help to reduce transport-related emissions in the Borough. The policy also requires ‘minimum’ parking spaces for residential development and sets a maximum number of spaces for residential development in PTALs 2 - 6a. setting a ‘maximum’. Setting a limit on the number of parking spaces for the development of 1-2 bed and 3 bed homes in areas with good access to public transport will help to encourage the use of sustainable modes of transport to a greater degree and have a long-term minor positive effect on climate change.

10.2.8 **Draft Policy 31** (Relieving Congestion) and **Draft Policy 33** (Access for All) encourage the use of sustainable transport by locating development in accessible locations that can be accessed by walking, cycling or public transport without compromising safety and by requiring facilities such as bus shelters or cycle storage. Both policies should help to facilitate modal shift and reduce transport-related emissions in the Borough with a long-term minor positive effect.

10.2.9 **Draft Policy 35** (Transport Investment Priorities) makes a commitment to secure investment in potential future schemes increasing public transport accessibility to Central and East London. However **Draft Policy 36** (Safeguarding Land for Transport improvements) would result in the safeguarding of land for a number of transport improvement schemes, including a number of road schemes which could further increase car dependency and in turn increase transport emissions through increasing capacity of the road network. It is **recommended** that more supporting information (both justification text and route maps) should be provided to explain the rationale behind these road schemes.

Bromley's Valued Environments

10.2.10 **Draft Policy 37** (General Design of Development) requires that "*development should address sustainable design and construction and include where appropriate on-site energy generation*" and include recycling and waste storage facilities on-site. These measures should help to reduce GHG emissions, minimise resource use and generate increased renewable energy with a long-term minor positive effect on climate change.

10.2.11 **Draft Policy 41** (Conservation Areas) protects Conservation Areas from development that would harm or change the character or appearance of the area. This approach could prevent/restrict residents in retrofitting new technologies to improve the energy efficiency of the building stock. Retrofitting the existing building stock is an issue as domestic energy use is the greatest contributor to the Borough's high carbon footprint – primarily due to the age of the dwelling stock. It is **recommended** that policies encourage the retrofitting of dwellings; including those in Conservation Areas and those that have heritage value providing that certain design conditions are met.

10.2.12 **Draft Policy 55** (Urban Open Space)**, Draft Policy 50 (**Metropolitan Open Land) and **Draft Policy 56** (Local Green Space) seek to protect and enhance provision of Open Space, Green Corridors which should help mitigate against climate change through increased carbon sequestration and enhanced potential for active transport routes. Potential for a long-term minor positive effect.

Working in Bromley

10.2.13 By directing development growth in-line with the settlement hierarchy this should help to reduce the need to travel by delivering employment and retail growth at the most accessible locations in the Borough. The one exception to this is **Draft Policy 103** (Biggin Hill SOLDC) which allocates growth at a relatively isolated location that is not well-served by public transport. Furthermore, the majority of housing delivery will occur in the north or the Borough whilst Biggin Hill is in the south. Development at Biggin Hill could therefore encourage transport via private car and lead to increased emissions from transport, resulting in negative effects in terms of climate change mitigation. It is **recommended** that provisions for improved public transport connections are made to mitigate the significance of this effect.

Environmental Challenges

10.2.14 **Draft Policy 112** (Planning for Sustainable Waste Management) supports the waste hierarchy in the approach to waste management by seeking to make more efficient use of resources and waste and requires proposals for major development to provide Site Waste Management Plans. **Draft Policy 113** (Waste Management in New Development) supports recycling by requiring adequate on-site provision of recycling space in new development. **Draft Policy 114** (New Waste Management Facilities and Extensions and Alterations to Existing Sites) adds to this by seeking to move waste up the waste hierarchy.

10.2.15 **Draft Policy 123** (Sustainable Design and Construction) requires all development proposals to demonstrate that the principles of sustainable design and construction have been taken into account. This includes minimising carbon dioxide emissions; using resources efficiently; minimising pollution; minimising the generation of waste and maximising reuse and recycling; and securing sustainable procurement of materials. Additionally **Draft Policy 124** (Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy) seeks to reduce the carbon dioxide emissions from new developments in accordance with the levels set out in the London Plan. These requirements should benefit climate change mitigation through reducing emissions and minimising resource use during the construction and operation of the development. Domestic energy is the biggest contributor to carbon emissions in Bromley and this policy should contribute to the reduction in average household energy use.

The preferred approach 'as a whole'

10.2.16 The plan performs favourably on the basis that the spatial strategy should help to reduce the need to travel/support more sustainable transport, and policy is in place requiring development to contribute to moving waste up the waste hierarchy and facilitate low carbon heating / electricity and energy efficiency. Average household energy use and emissions should decrease as a result of these policies. This should lead to positive effects in terms of climate change mitigation.

10.2.17 There are, however, possible draw-backs in that Biggin Hill is perhaps less than ideal given poor public transport accessibility. If transport-related emissions are to be reduced then investment in public transport will be required that links existing communities and new housing with employment growth at Biggin Hill.

10.2.18 On balance, it is appropriate to conclude **neutral effects** at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline[19]. When the Draft Local Plan is considered in-combination with development proposed in the surrounding areas of the Borough there is the potential for a cumulative negative effect as a result of increased GHG emissions. However, this is not likely to be of significance as proposed development should help to reduce the need to travel and improve access to sustainable modes of transport. The incorporation of low carbon heating/ electricity and energy efficiency in new development should also help to mitigate the significance of any residual negative effect.

[19] In relation to climate change mitigation, there is very little potential to conclude that a Local Plan will result in significant effects, recognising the climate change mitigation is a global issue.

10.3 Community and well-being

Spatial Strategy

10.3.1 The Spatial Strategy focusses development in sustainable locations, close to existing facilities, and re-using brownfield sites in accordance with the settlement hierarchy. This should benefit existing communities and aid regeneration and renewal in deprived areas in the Borough. By focussing development in the more urban north of the Borough, there is the potential that more rural areas to the south could 'miss out' from the benefits of development (including public transport improvements, community and health infrastructure and increased access to employment). It is **recommended** that public transport improvements linking growth and development in the north are inclusive to the south in order to ensure that rural areas benefit from growth. Overall, the spatial strategy will have a significant long-term positive effect on community and well-being.

Living in Bromley

10.3.2 From an EqIA perspective you could argue that there is a need to establish higher housing supply targets in order to address existing inequalities in access to housing and growing demand for housing. **Draft Policy 1** (Housing Supply) seeks to increase housing delivery which should help address housing affordability given that it sets out to meet the minimum target identified in the FALP London Plan 2015. The policy focusses development in town centres, renewal areas and development in suitable locations (for public transport). This should help to address deprivation in the more deprived parts of the Borough, although it is likely that the more rural areas will not benefit from additional housing and affordable housing. The delivery of 641 new dwellings will have a significant long-term positive effect by meeting the housing needs of communities.

10.3.3 **Draft Policy 4** (Housing Design) requires residential developments to meet the minimum space standards set out in the London Plan and requires amenity space and play space, which should lead to health benefits in terms of increased living space and improved opportunities for recreation. The policy also gives priority to active transport in its layout which should lead to health benefits by encouraging walking and cycling and also improving air quality by reducing the need to travel via private car. The policy obliges developments to meet Building Regulation M4(2) and deliver a proportion of wheelchair user units (Building Regulation M4 (3) [2a] or [2b]) - all units that are wheelchair accessible - both of which will benefit the ageing population as it will allow people to remain independent in their own homes for longer. Potential for a minor long-term positive effect.

10.3.4 Criterion G seeks a layout that is designed to give priority to pedestrians and cyclists over the movement and parking of vehicles. This may disadvantage disabled residents who rely on the private vehicle. However, this is unlikely to be significant issue as **Draft Policy 30** (Parking) ensures that any new residential development provides designated blue badge parking and **Draft Policy 33** (Access for all) requires proposals to be designed to ensure ease of access and movement for people with disabilities, both physical and sensory.

10.3.5 **Draft Policy 2** (Provision of Affordable Housing) defines the thresholds for affordable housing. The policy states that affordable housing will be sought on all housing sites capable of providing 11 residential units or more, or where the residential floorspace is more than 1000spm, irrespective of the number of dwellings. This policy should lead to an increase in the number of affordable housing units delivered in the Borough and have a significant long-term positive effect for communities.

10.3.6 **Draft Policy 7** (Accommodation for Family Members) has the potential to increase delivery of accommodation for elderly people or those that have care needs, subject to criteria. This could help to address the housing needs of Bromley's increasingly ageing population and have a minor positive effect.

10.3.7 **Draft Policy 9** (Residential Conversions) allows the sub-division of residential units, subject to development proposals meeting a range of criteria. This policy has the potential to contribute to increasing housing affordability and choice of accommodation for smaller or less affluent households with a minor positive effect. The same effects are predicted as a result of **Draft Policy 10** (Conversion of Non-Residential Buildings to Residential).

10.3.8 **Draft Policy 11** (Specialist and Older People's Accommodation) seeks to increase housing supply for older people through protecting existing specialist accommodation and supporting opportunities to maximise the use of sites currently providing specialist accommodation. The policy also seeks to ensure that development provides appropriate parking.

10.3.9 **Draft Policy 12** (Travellers' Accommodation) states that the Council will seek to address the accommodation needs of Travellers and Travelling Show-people. The policy requires proposals for new traveller sites to be located within a range of community infrastructure and to demonstrate that they will have no adverse impacts on the health or wellbeing of Gypsies and Travellers (related to the quality of the local environment). This policy approach should help to address health inequalities for these groups and ensure they are able to participate fully in society. The policy also seeks to work with other LAs in the sub-region to secure the provision of transit sites in an appropriate location, which will have a positive effects in terms of equalities.

10.3.10 **Draft Policy 13** (Renewal Areas) seeks to direct new development to the Borough's most deprived areas. This policy provides support to improve provision of health and community infrastructure and improve the environmental quality of the area which should help to address health inequalities. Furthermore proposals will be expected to maximise opportunities to provide a range and mix of tenures which should help to address housing affordability. The policy also supports the need to improve public transport accessibility which should help to improve access to employment and other infrastructure. Policy has the potential for a long-term minor positive effect.

Supporting Communities

10.3.11 **Draft Policies 20** (Community Facilities) and **21** (Opportunities for Community Facilities) seek to protect existing provision and increase provision in accessible areas where there is an identified need; this should result in benefits in terms of health, inequalities, improved recreation and education. **Draft Policy 20** (Community Facilities) promotes quality of life and the health and wellbeing of those living and working in the Borough and seeks the provision, enhancement and retention of a range of social infrastructure, including places of worship and venues for cultural and social activities. Policies will have long-term minor positive effects for communities.

10.3.12 **Draft Policy 22** (Social Infrastructure in New Developments) seeks to deliver on-site supporting infrastructure (or off-site where not possible) for new development; taking into account of the nature and scale of the proposal and whether the site is in an area of deficiency. This should help to increase access to infrastructure and reduce inequalities with a positive effect on this topic.

10.3.13 **Draft Policy 23** (Public Houses) seeks to protect pubs and only permits their loss subject to certain criteria being met. This should ensure that protection is given to an important community resource.

10.3.14 **Draft Policy 24** (Allotments and Leisure Gardens) will safeguard existing allotments and explore opportunities for additional allotment provision. This should result in benefits in terms of health due to increased open space provision, the opportunity to contribute towards healthy eating and increase the opportunity for people to undertake a leisure pursuit.

10.3.15 **Draft Policy 26** (Health and Wellbeing) explicitly states the Council's intention to improve health and reduce health inequalities through supporting local health strategies; delivering healthy, quality environments; and ensuring access to open space, and both improving and providing new health facilities. This policy will have a long-term positive effect on communities and well-being.

10.3.16 **Draft Policy 27** (Education) seeks to ensure the provision of a range of educational facilities to cater for lifelong learning through identifying areas of deficiency; protecting existing 'Education Land' and extending existing schools. **Draft Policy 28** (Educational Facilities) supports proposals for new schools or extensions to existing schools where there is local need. Opportunities to maximise the use of existing Education Land or redundant social infrastructure will be explored before new facilities are considered.

10.3.17 **Policy 29** (Education Site Allocations) proposes a number of allocations for the extension of existing or new education facilities. The allocation of these sites will lead to the re-designation of Metropolitan Open Land or Greenbelt to Urban Open Land to allow the expansion of existing facilities and the development of new schools. Any losses to the community in terms of access to the environment should however be offset by the gains resulting from increases in the provision of educational facilities to meet projected needs. **Draft Policies 27 to 29** have the potential for a long-term positive effect by helping to meet the education needs of the Borough.

Getting Around

10.3.18 Generally, transport policies are focussed around increasing public transport accessibility and reducing the need to travel through increased walking and cycling provision. This approach, combined with focussing development in-line with the settlement hierarchy and at renewal areas, should ensure that deprived areas are better-able to access community infrastructure and employment; and that healthy lifestyles are encouraged as the opportunity for active travel is increased.

10.3.19 **Draft Policy 30** (Parking) requires provision for 'blue badge' parking for older people, disabled people and those of poor health. From an EqIA perspective there is also a need to consider disabled parking at public transport interchanges. **Draft Policy 34,** (Highway Infrastructure Provision) also seeks to improve the ease of access for those with mobility impairments. This should help to reduce inequalities in opportunity and access to community infrastructure and to address health inequalities.

10.3.20 **Draft Policies 31** (Relieving Congestion) and **33** (Access for all) seek to improve access to sustainable transport, along with improvements to the highway network and other supporting infrastructure. In Particular, **Draft Policy 33** (Access for all) seeks to ensure that the proposals are designed in such a manner so as to ensure ease of access for people with disabilities. This should help to reduce inequalities experienced by those with disabilities, ensuring that Bromley Borough Council are fulfilling their public sector equality duties, under the Equalities Act 2010.

10.3.21 **Draft Policy 35** (Transport Investment Priorities) and **Draft Policy 36** (Safeguarding Land for Transport Improvements) safeguard land and provide support for transport schemes that would improve access to employment at the Docklands and to East London in the future.

Bromley's Valued Environments

10.3.22 **Draft Policy 37** (General Design of Development) affords protection to the amenity of residents and occupiers of adjacent buildings, which should lead to health benefits in terms of reducing peoples' exposure to air, noise and light pollution from new development. The policy also requires suitable access for people with impaired mobility which should lead to increased accessibility to buildings and housing for older and disabled people. Potential for minor positive effects.

10.3.23 **Draft Policies 49** (the Green Belt) and **50** (Metropolitan Open Land) allow, in principle, sport and recreation in these designated areas, subject to them preserving the openness of the Green Belt not conflicting with its purposes. **Draft Policy 57** (Outdoor Recreation and Leisure) and **58** (Outdoor Sport, Recreation and Play) seek to retain and enhance recreation and leisure facilities which should have a minor long-term positive effect for health.

10.3.24 Policies to protect and enhance open space and biodiversity, such as **Draft Policy 54** (South East London Green Chain), **Draft Policy 60** (Public Rights of Way and Other Recreational Routes) and **Draft Policy 78** (Green Corridors), should result positive effects for health through improved access to leisure opportunities and active travel routes. **Draft Policy 59** (Public Open Space Deficiency) specifically seeks to increase open space provision in areas of deficiency; this should be of benefit to those who are currently unable to access open space and have a long-term minor positive effect for health. Together these policies should help to improve health and reduce inequalities.

Working in Bromley

10.3.25 Generally the employment policies promote growth in accessible locations which should in turn help to promote the uptake of sustainable transport and increase the quality (i.e. frequency and coverage) of service through increased demand and patronage. Increased employment opportunities should also help in terms of housing affordability with a positive effect for communities and health.

10.3.26 **Draft Policy 80** (Strategic Economic Growth) promotes growth in Bromley Town Centre, the Cray Valley and at Biggin Hill. Increased employment opportunities focussed in the renewal areas and towns should lead to benefits for deprived communities. In particular, economic growth in the Cray Corridor should have a positive effect as it is relatively deprived in comparison to the rest of the Borough. Allocating jobs at Biggin Hill should have positive effects for the rural southern part of the Borough although it is poorly served by public transport.

10.3.27 **Draft Policy 91** (Proposals for Main Town Centre Uses) follows the sequential approach of supporting development in-line with the settlement hierarchy which should help to increase access to community facilities, shops and services and help to encourage sustainable transport.

10.3.28 **Draft Policy 97** (Change in Use of Upper Floors) supports proposals for mixed-use development, subject to proposals meeting a range of criteria. This approach should potentially help to increase access to community infrastructure and residential accommodation which could help to address housing affordability issues with a long-term minor positive effect.

10.3.29 **Draft Policy 111** (Crystal Palace SOLDC) looks to enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of Crystal Park. This should help to deliver a positive effect on wellbeing.

Environmental Challenges

10.3.30 **Draft Policy 114** (New Waste Management Facilities and Extensions and Alterations to Existing Sites) contains criteria to protect against health impacts from new waste-related development. Additionally policies **119** (Noise Pollution), **120** (Air Quality) and **122** (Light Pollution) seek to minimise pollution from all new development.

10.3.31 **Draft Policy 123** (Sustainable Design and Construction) requires new development to avoid internal overheating and contributing to the urban heat island effect as well as to minimise pollution and to promote biodiversity and green infrastructure. This should ensure that new development has a positive effect on the health of residents.

The preferred approach 'as a whole'

10.3.32 The Spatial Strategy seeks to direct housing development and employment growth to accessible locations and use development to improve access in areas of deficiency. The approach to increasing housing provision should lead to improved affordability, flexibility to allow for extensions and subdivisions and change of use to accommodate new dwellings for market housing and also provide additional housing for older people. The preferred approach will also help to meet the education needs of the Borough, which is identified as a key and ongoing issue for communities. The approach should encourage healthy lifestyles through active transport and access to leisure facilities and open space. The policies in the 'Supporting Communities' chapter should result in improvements to community infrastructure and investment in public transport.

10.3.33 In terms of equalities, the preferred approach will have positive effects as it will help to meet the needs of all residents and visitors. Increasing accessibility to affordable housing will have significant benefits as affordability is a significant barrier to greater equality within the Borough. The preferred approach supports equal access to facilities and services for existing communities and in new developments.

10.3.34 The combination of the above factors means that the Draft Local Plan as a whole is likely to result in **significant positive effects** in terms of community and wellbeing. There is also likely to be significant cumulative positive effects when the Draft Local Plan is considered in-combination with the delivery of new housing and associated community infrastructure proposed in surrounding areas.

10.4 Economy

Spatial Strategy

10.4.1 Generally the spatial strategy focuses housing development in the main settlements and near the main employment areas; intending to match housing growth with employment growth. The Strategy also seeks to protect existing employment land from redevelopment. Allocating employment growth at Biggin Hill may result in a potentially negative effect as housing growth will be detached from employment growth in this relatively isolated part of the Borough. In order to address this it is **recommended** that improvements are made to public transport accessibility to Biggin Hill. Other than this one strategic site, development in the rest of the Borough is in-line with the settlement and retail hierarchy so should lead to long-term significant positive effects in terms of the local economy within metropolitan, major, district and local centres.

Living in Bromley

10.4.2 **Draft Policy 1** (Housing Supply) broadly allocates development in-line with the settlement hierarchy – namely by matching housing growth with employment growth and job supply; with a focus on renewal areas. The policy seeks to bring vacant properties back into use and deliver mixed-use development; both of which should make a positive contribution to the local economy and its key employment centres. Additionally **Draft Policy 2** (Provision of Affordable Housing) should benefit the local economy through increasing the affordability of housing and resulting in greater 'disposable income' than would otherwise be the case.

10.4.3 **Draft Policy 10** (Conversion of non-residential buildings to residential) will permit the conversion of genuinely redundant non-residential buildings to residential use. This could potentially result in a reduction of some employment space across the Borough and have a minor negative effect; however, this is uncertain at this stage.

10.4.4 **Draft Policy 13** (Renewal Areas) seeks to deliver '*demonstrable economic, social and environmental benefits'*. The policy lists a number of opportunities that proposals will be expected to maximise, among them is to '*make a positive contribution to the vitality of local centres having regard for their importance as providers both of local facilities and local employment.'* Policy has the potential for a significant positive effect depending on the proposals that come forward.

Supporting Communities

10.4.5 Policies under this theme seek to make the Borough an attractive place to live and work in which should help attract employers to the area. **Draft Policy 21** (Opportunities for Community Facilities) encourages the temporary use of vacant buildings for community facilities; community uses in town and district secondary frontages, neighbourhood centres and local shopping parades; the creation of community hubs and the cultural and leisure use of the public realm. These approaches should help to increase the vitality of town and district centres, and have a long-term positive effect the local economy by attracting people and businesses to the centres.

10.4.6 Additionally, **Draft Policy 27** (Education) and **28** (Educational Facilities) should play a positive role in improving the skills of residents from early years through to further and higher education. Subject to the timely provision of necessary additional educational capacity, this should enable residents to take advantage of the office and knowledge-based jobs that the Plan seeks to deliver.

Getting Around

10.4.7 **Draft Policies 31** (Relieving Congestion) and **33** (Access For All) seek to encourage accessibility by public transport, walking and cycling. As these policies may require developers to make contributions to infrastructure improvements and other facilities it could potentially lead to negative effects through reducing attractiveness to some businesses. However, increasing peoples' access to shops, services and employment opportunities would also be expected to result in some positive effects for the economy through increased spending and the generation of additional economic activity.

10.4.8 **Draft Policies 35** (Transport Investment Priorities) and **36** (Safeguarding Land for Transport Improvements) are expected to result in improvements to the Borough's public transport connectivity to Canary Wharf and East London through the extension of the Docklands Light Railway (DLR) to Bromley Town Centre. The extension of the DLR could attract businesses to Bromley town centre, particularly for 'back office' functions which would open up employment opportunities to new and existing residents. New transport links to Canary Wharf and East London may also attract high-skilled workers to live in the Borough, however this would also potentially encourage the out-commuting of residents for employment which could undermine local employment.

Bromley's Valued Environments

10.4.9 **Draft Policy 37** (General Design of Developments) will require all development proposals, including extensions to existing buildings, to be of a high standard of design and layout. The maintenance and enhancement of an attractive environment should help to encourage investment and increase the competitiveness of the Borough, thus having a minor positive effect for the economy.

Working in Bromley

10.4.10 **Draft Policy 80** (Strategic Economic Growth) identifies three priority areas for economic growth: at Bromley Town Centre; Cray Commercial Corridor and Biggin Hill Strategic Outer London Development Centre. The Cray Business corridor is identified as a '**Strategic Industrial Location**' which will be safeguarded for B1, B2 or B8 development and has policy support for intensification, and upgrading, of land use in order to create more jobs in a key employment centre. This intensification approach should not only maintain existing employment but also deliver additional employment opportunities thereby having a long-term significant positive effect in terms of the economy. **Draft Policy 80** (Strategic Economic Growth) will be supplemented by **Draft Policy 82** (Locally Significant Industrial Sites (LSIS)) which will protect LSIS sites from change of use, subject to criteria.

10.4.11 In recognition of the increasing pressure on change of use of employment sites to residential, **Draft Policy 83** (Non-Designated Employment Land) provides policy support for the protection of employment land outside SILs and LSISs from change of use unless it can be shown that there has been no demand for such space and that there is not likely to be in the medium to long-term. This approach should help to deliver a varied and flexible employment base which should have a positive effect on the local economy by being responsive to market conditions.

10.4.12 **Draft Policy 84** (Business Improvement Areas (BIAs)) will result in the designation of three BIAs in Bromley Town Centre with the aim of managing and improving the supply of high quality office floorspace. Improving the supply of quality office floorspace will be critical to maintaining the competitiveness of the Borough in the future as the economic recovery continues. The BIAs are in strategic locations in the town centre and should help to ensure the delivery of employment opportunities in the future with a positive effect.

10.4.13 There has been significant loss of office space within the Borough, with the trend expected to continue. In order to ensure adequate supplies of good quality office accommodation are retained to accommodate forecast employment growth over the Plan period, **Draft Policy 85** (Office Clusters) establishes Key Office Clusters. This is a new designation which will the clusters of offices identified as important to the Borough and support the provision of good quality office stock. In total three Clusters have been designated and are likely to lead to positive economic effects.

10.4.14 **Draft Policy 86** (Office Uses Outside Town Centres) seeks ensure that new office development will be located within the town centre (provided that the retail function of the town centre is not impaired). In light of employment growth being forecast to increase in the Borough over the Plan Period, the aim of the policy is to ensure policy is to safeguard sufficient land for office based employment in the most appropriate locations (such as the BIAs in Bromley Town Centre for large offices), and restrict the release of purpose-built large offices through a criteria based approach which considers the market and favours retaining employment generating uses on sites.

10.4.15 **Draft Policy 88** (Hotels) seeks to direct new hotel development to the edge of Bromley and Orpington town centres, or within a district centre or local centre. This approach is in-line with the settlement hierarchy so that any new hotel developments will service employment growth and be located in accessible locations. This policy should facilitate the development of new hotels that would deliver additional jobs in key employment centres in the Borough and have a minor positive effect on the local economy.

10.4.16 **Draft Policy 91** (Proposals for Main Town Centre Uses) will seek to ensure that new retail, commercial and leisure developments are located, where possible, within designated town centres. Development outside of defined town centres will be restricted in order to protect town centres. This policy should ensure that new development is directed to the most accessible areas, where the greatest employment areas are based.

10.4.17 **Draft Policy 92** (Metropolitan and Major Town Centres) seeks to protect existing retail use in primary and secondary frontages. **Draft Policy 94** (District Centres) seeks to achieve the same objective for district centres.

10.4.18 **Draft Policies 95** (Local Centres) and **96** (Neighbourhood Centres, Local Parades and Individual Shops) provide policy support for essential daily goods and services for these areas, with the aim of not undermining the larger centres.

10.4.19 **Draft Policies 93** (Bromley Shopping Centre) and **97** (Change of Use in Upper Floors) seek to protect existing 'town centre uses' while allowing the flexibility of changes in use if the demand is not there in order to maintain the vitality of town centres. In the event that town centres continue their trend of constriction, the policies will support a level of flexibility that should benefit the local economy through enabling alternative uses and allowing more people to live in town centres.

10.4.20 **Draft Policy 103** (Biggin Hill Strategic Outer London Development Centre (SOLDC)) supports high-tech industry and aviation-related development at the airport's 'West Camp' (**105**), 'East Camp' (**108**) and 'South Camp' (**106**). This approach is in accordance with the London Plan and would lead to the creation of a number of high-value employment opportunities in high-skilled occupations.

10.4.21 **Draft Policy 111** (Crystal Palace SOLDC) looks to enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of Crystal Park, so presenting opportunities to encourage economic growth.

Environmental Challenges

10.4.22 The Draft Policies included in this chapter focus on placing obligations on new development (including that for employment) to ensure that the environment is protected. None of the policies have a clear direct relationship with the 'Economy' topic.

The preferred approach 'as a whole'

10.4.23 Overall, the approach seeks to match employment growth with housing growth which is likely to have positive effects in terms of the economic growth objectives. The exception to this is Biggin Hill, which is in a relatively isolated part of the Borough; however growth here aims to achieve specific aviation and high-tech industry objectives, and accords with the London Plan SOLDC designation. Also of note is the policy of focusing growth at 'Renewal Areas', where proposals will be required to *'make a positive contribution to the vitality of local centres having regard for their importance as providers both of local facilities and local employment.'*

10.4.24 A number of the policies included in the 'Working in Bromley' chapter seek to protect retail uses in town centres, from the Metropolitan level down to the neighbourhood level. However the policy is flexible in that should there be no market demand for these uses, the policy would allow a change to alternative uses. This approach should help to maintain the vibrancy and vitality of the Borough's town centres and have a long-term positive effect.

10.4.25 Also of note are policies that seek to improve the supply of quality office space. Employment growth in high-tech and office jobs should lead to the creation of additional high-value employment in the Borough.

10.4.26 Overall, the Draft Local Plan as a whole should lead to **significant positive effects**, including through improving the competitiveness of employment centres; protecting and enhancing smaller centres, shops and parades; delivering additional employment and high-value employment; and making the best use of employment opportunities at Biggin Hill. There is potentially an issue in that new transport links between Bromley and Canary Wharf could give rise to increases in out-commuting; however, it is not clear that this would be to the detriment of the local economy.

10.4.27 There is also the potential for significant positive cumulative effects on the wider economy when the Draft Local Plan is considered in-combination with the delivery of new employment and associated infrastructure improvements proposed in the surrounding areas.

10.5 Landscape, townscape and cultural heritage

Spatial Strategy

10.5.1 The Spatial Strategy allocates no development in the AONB so there should be no significant negative effects in terms of landscape. It directs development to major settlements in-line with the settlement hierarchy where a number of designated townscapes and cultural heritage assets are located; consequently there is the potential for negative effects to occur. This is discussed in more detail in relation to the relevant Development Management policies below. Additionally, there may also be negative effects on landscape associated with Green Belt amendments around Biggin Hill which will result in expansion of development into land previously designated as Green Belt. Furthermore, there may be re-designation of Green Belt to Urban Open Space to allow expansion of existing schools which may again result in negative effects.

Living in Bromley

10.5.2 **Draft Policy 1** (Housing Supply) seeks to bring empty properties back into use, this is expected to have positive effects in terms of the townscape as it should help to enhance the character of urban areas.

10.5.3 **Draft Policy 3** (Backland and Garden Land Development) requires new residential development to demonstrate that it will have '*no unacceptable impact upon the character and appearance of an area in relation to the scale, design and density of the proposed development*' and that '*a high standard of separation and landscaping is provided'*.

10.5.4 A number of the Development Management Policies include criteria that will require new development to achieve high standards of design and enhance local character which should have positive effects in terms of townscape. For example, **Draft Policy 4** (Housing Design) requires new housing development to achieve a high standard of design, '*whilst enhancing the quality of local places. Housing schemes will also need to respect local character, spatial standards, physical context and density*. It also requires off-street parking to be '*well-integrated within the overall design of the development'*.

10.5.5 Similarly **Draft Policy 6** (Residential Extensions) and **Draft Policy 7** (Accommodation for Family Members) require the scale, form and materials of extensions to complement the existing dwelling and surrounding area. In addition, **Draft Policy 9** (Residential Conversions) will only permit residential conversions where it can be shown that the character and appearance of the area is not adversely affected. These policies should help to ensure that the landscape and townscape features in urban areas in the Borough are protected.

10.5.6 In terms of landscape issues, **Draft Policy 12** (Traveller's Accommodation) requires proposals for new development within allocated traveller sites to be sensitively located and landscaped in order to minimise adverse impacts on the visual amenity of the site and adjoining land.

10.5.7 **Draft Policy 13** (Renewal Areas) includes a number of criteria that proposals must achieve, two of which are expected to have positive effects in terms of the landscape, townscape and cultural heritage topic, namely: to '*deliver high quality environments which complement and enhance existing development and 'assets', including built heritage and other environmental assets*'; and to optimise '*opportunities to increase provision or enhance the quality of open spaces*'.

Supporting Communities

10.5.8 **Draft Policy 22** (Social Infrastructure in New Developments) will require developments of significant scale to incorporate public realm which creates a sense of place within their design. This should have a positive effect in terms of protecting urban character in the Borough.

10.5.9 **Draft Policy 29** (Education Site Allocations) proposes a number of allocations for the extension of existing or new education facilities. The allocation of these sites will lead to the re-designation of Metropolitan Open Land or Greenbelt to Urban Open Land to allow the expansion of existing facilities and the development of new schools. Any losses to the community in terms of access to the environment should however be offset by the gains resulting from increases in the provision of educational facilities to meet projected needs. The loss of open land is unlikely to have a negative effect of significance.

Getting Around

10.5.10 **Draft Policy 30** (Parking) sets out minimum levels for off-street parking spaces in residential development but does not take visual impacts of parking on the street scene into account. It is **recommended** that the policy is revised to incorporate a requirement for the design of parking to demonstrate that it will not adversely affect the street scene, particularly in the setting of designated assets and areas such as Conservation Areas.

Bromley's Valued Environments

10.5.11 **Draft Policy 37** (General Design of Development) requires all development proposals to be of a high standard of design and layout. This should result in a strong level of protection for existing development and a high standard of design for future development in the Borough with a positive effect on landscape and townscape.

10.5.12 With regards to townscape issues, a number of development management policies are included that are expected to have a positive effect in terms of this topic. **Draft Policy 38** (Statutory Listed Buildings) requires development involving listed buildings or their setting to ensure that the character, appearance and special interested of listed buildings are preserved and that there is no harm to their setting. Similarly **Draft Policy 39** (Locally Listed Buildings) seeks to preserve and conserve the character of buildings on the Council's Local List of local or historical interest.

10.5.13 **Draft Policy 41** (Conservation Areas) requires development proposals to '*respect or complement the layout, scale, form and materials of existing buildings and spaces; respecting and incorporating in the design existing landscape or other features that contribute to the character, appearance or historic value of the area; and use high quality materials'*. In addition, **Draft Policy 42** (Development Adjacent to a Conservation Area) requires proposals to preserve or enhance the setting of Conservation Areas and not detract from views into or out of the area.

10.5.14 **Draft Policy 45** (Historic Parks and Gardens) requires development proposals within or adjoining a registered historic park or garden to protect the special features, historic interest and setting of the park or garden. **Draft Policy 46** (Ancient Monuments and Archaeology) will not permit development proposals if they would adversely affect SAMs or other nationally-important archaeological sites, involve significant alterations to them or harm their settings. Both policies should help ensure that the Borough's heritage assets are protected and enhanced.

10.5.15 Much of the Borough is characterised by suburban development, as such **Draft Policy 47** (Tall and Large Buildings) requires proposals for such developments to be of the '*highest architectural quality*' and make a positive contribution to the townscape. Similarly, **Draft Policy 48** (Skyline) aims to prevent development that would adversely affect local views, landmarks or skyline ridges.

10.5.16 In cases where development proposals are otherwise acceptable, but cannot avoid damage to and/or loss of wildlife features, **Draft Policy 70** (Wildlife Features) will seek to replace such features through the creation, enhancement and management of wildlife habitats and landscape features.

10.5.17 **Draft Policies 73** (Development and Trees) and **74** (Conservation and Management of Trees and Woodlands) seek the protection of trees that are covered by a Tree Preservation Order (TPO) and to improve the amenity and conservation value of trees and woodlands through a number of mechanisms, including encouraging appropriate new tree planting in suitable locations.

10.5.18 A number of the development management policies, including **76** (Kent Downs Area of Outstanding Natural Beauty) and **77** (Landscape Quality and Character) seek to protect the quality and character of the local landscape.

10.5.19 In addition a number of policies are included that relate to the Green Belt such as **Draft Policy 49** (Green Belt), **51** (Dwellings in the Green Belt or on Metropolitan Open Land), **52** (Replacement Residential Dwellings in the Green Belt), **53** (Land Adjoining Green Belt or Metropolitan Open Land) and **63** (Development Related to Farm Diversification). These policies should ensure that the Green Belt is protected from inappropriate development and that the openness of the Green Belt is preserved, thereby helping to protect the Borough's landscape character.

Working in Bromley

10.5.20 Development is focussed on major settlements in-line with the settlement hierarchy; where there are designated townscapes and cultural heritage assets.

10.5.21 **Draft Policy 89** (Telecommunications Development) requires development involving telecommunications to demonstrate that it will have minimal visual impact and that any adverse impact on the character, appearance and amenity of the area has been minimised.

10.5.22 **Draft Policies 92** (Metropolitan and Major Town Centres) and **94** (District Centres) will not permit change of use from retail where the proposal would result in harm to the retail character or attractiveness of the town.

10.5.23 **Draft Policy 97** (Change in Use of Upper Floors) seeks to encourage owners to bring unused or under-utilised upper floors of existing buildings in the town centres, into productive residential, community or office use, provided the proposal does not adversely affect the character or appearance of the property.

10.5.24 **Draft Policy 101** (Shopfronts and Security Shutters) will ensure that proposals to remove shopfronts of architectural or historic merit will be resisted. The policy will also require proposals for new shop fronts to demonstrate a high quality of design and complement the surrounding street scene and building. This approach is expected to have a positive effect in terms of townscape.

10.5.25 **Draft Policy 102** (Advertisements) will require all proposals for advertisements, hoardings and signs to have regard to the character of the surrounding area and, where they are located in a conservation area, to preserve or enhance the appearance of it. This approach should help to ensure that the urban character and heritage assets in the Borough are protected.

10.5.26 **Draft Policy 103** (Biggin Hill SOLDC) and **105** (West Camp) seek to increase economic growth activities at Biggin Hill Airport and the adjoining industrial area. The policies require proposals to include the sensitive re-use of heritage buildings, which should ensure that minimal negative effects are experienced.

10.5.27 **Draft Policy 111** (Crystal Palace SOLDC) looks to enhance and support the unique existing functions; including ensuring that the park's open setting, visual and landscaping amenities, and key heritage assets are maintained and improved. It expected that this will lead to positive effects in terms of the Boroughs landscape and heritage.

Environmental Challenges

10.5.28 **Draft Policy 114** (New Waste Management Facilities and Extensions and Alterations to Existing Sites) will require consideration to be given to the likely impact of proposals on the local environment and will require proposals for new facilities, extensions and alterations to be '*well designed and contribute positively to local character as far as possible'*.

10.5.29 **Draft Policy 122** (Light Pollution) requires lighting in proposals for new development to have 'no adverse impact on landscape'. This should help to protect the landscape character thereby having a positive effect in terms of the landscape topic.

The preferred approach 'as a whole'

10.5.30 The policy of restricting development in the Green Belt except in very special circumstances should help to preserve landscape character. Similarly Draft Policy 76 (Kent Downs Area of Outstanding Natural Beauty) will seek to protect the AONB from development that might potentially have a detrimental impact. Together these policies should have a positive effect in terms of protecting the Borough's landscape character.

10.5.31 The spatial strategy seeks to focus development in-line with the settlement hierarchy which could potentially result in negative effects on Conservation Areas and listed buildings; however, a number of the policies require proposals to demonstrate a high standard of design that takes into account landscape, townscape and cultural heritage assets. These policies should provide a good level of protection to designated assets in the Borough.

10.5.32 Development at the Biggin Hill SOLDC should enable the restoration and maintenance of historic assets in the Conservation Area which is identified as being 'at risk'. Policy requires development to '*sensitively re-use heritage assets*' while allowing flexibility for some demolition where re-use is not feasible and/or redevelopment is needed to deliver a viable development solution for the site. By seeking to retain and restore as many of the heritage assets as possible, this approach is expected to enable redevelopment at Biggin Hill where there is currently the potential for all assets to be lost due to neglect and disrepair. The policy is therefore expected to have a positive effect overall.

10.5.33 The preferred approach for meeting the education needs of the Borough reflects the lack of opportunities for expansion of existing education facilities. While the preferred approach will result in the re-designation of existing school sites from Green Belt and Metropolitan Open Land to Urban Open Space this is not likely to be of significance for landscape, townscape or heritage given the urban character of the Borough. It is also important to remember that there are no other reasonable alternatives for meeting the education needs of the Borough during the life of the plan.

10.5.34 Taken together the policies in the Plan should enable growth to be accommodated while the landscape, townscape and cultural heritage of the Borough is maintained and enhanced. Consequently, **significant positive effects** in terms of the landscape, townscape and cultural heritage topic are predicted for the Draft Local Plan as a whole. At this stage the cumulative effects are uncertain; however, in line with the NPPF development within the borough and in the surrounding areas should protect and enhance valued landscapes and heritage assets.

10.6 Water, flood risk and other climate change adaptation issues

Spatial Strategy

10.6.1 The proposed distribution of housing, employment and retail development as set out in the Spatial Strategy is shown at a very strategic level thus the ability to comment on its potential effects in terms of the water, flood risk and other climate change adaptation issues topic is limited. It will however be important for the call for sites proforma that will inform the selection of site allocations to include criteria relating to flood risk to ensure that flood risk is minimised.

Living in Bromley

10.6.2 **Draft Policy 1** (Housing Supply) seeks to deliver a minimum of 641 dpa during the life of the plan. The policy will result in additional development across the Borough which will increase demand for water and total water demand in an area of water stress. Additional development is also likely to result in increased paved surface areas which will reduce the ability of water to infiltrate into the ground. Potential for a negative effect although a number of development management policies considered below will help to provide mitigation.

10.6.3 **Draft Policy 3** (Backland and Garden Land Development) will require new residential development on backland or garden land to be resisted unless a number of criteria are met. Criteria include the requirement for there to be no unacceptable loss of landscaping, habitats or playspace which should have some minor positive effects in terms of reducing surface water runoff and therefore reducing flood risk. This is particularly beneficial in terms of climate change adaptation as the severity and frequency of flood events is set to increase.

10.6.4 **Draft Policy 12** (Traveller's Accommodation) seeks to address the accommodation needs of Travellers. The policy states that proposals will only be acceptable if they are able to meet a range of criteria, one of which states that proposals for sites in areas at high risk of flooding, including functional floodplains, will generally be resisted.

Supporting Communities

10.6.5 The policies included in this chapter focus on supporting communities through the provision of social infrastructure. None of the policies have a clear relationship with the 'Water, Flood Risk and other Climate Change Adaptation Issues' topic.

Getting Around

10.6.6 **Draft Policy 30** (Parking) sets out minimum levels of parking for new residential development, with a minimum established for three 'parking zones' where there is high accessibility to radial and orbital public transport links. It is recommended that the policy is revised to include a maximum level of parking provision and to include a requirement for the use of permeable material in parking areas. This could have a positive effect through reducing runoff rates and increasing infiltration, thereby preventing increased flood risk.

Bromley's Valued Environments

10.6.7 **Draft Policy 78** (Green Corridors) will require the Council to assess the likely impact of development proposals on the quality and character of green corridors through the Borough and will seek and support appropriate enhancement and management.

10.6.8 **Draft Policy 79** (Biodiversity and access to nature) seeks to enhance biodiversity across the Borough, assist ecological restoration and address spatial deficiencies in access to nature. This should help prioritise the connecting of fragmented habitats and increase the size of habitat areas which is expected to have a positive effect in terms of increasing climate change adaptation.

10.6.9 **Draft Policy 54** (South East London Green Chain) will require development proposals to respect and not harm the character or function of the Green Chain or the Green Chain Walk. It sets out a range of measures that proposals will be required to incorporate in order to ensure that these areas are protected.

10.6.10 **Draft Policy 56** (Local Green Space) seeks to protect local green space from inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm.

10.6.11 Taken together, the policies above are expected to help retain and enhance green spaces in the Borough which should help to increase rainwater infiltration and reduce run-off thus having a long-term minor positive effect on climate change adaptation.

Working in Bromley

10.6.12 The policies included in this chapter focus on retail and employment. None of the policies have a clear relationship with the 'Water, Flood Risk and other Climate Change Adaptation Issues' topic.

Environmental Challenges

10.6.13 **Draft Policy 114** (New Waste Management Facilities and Extensions and Alterations to Existing Sites) will require new waste management facilities and extensions and/or alterations to existing waste management facilities to demonstrate that they will not undermine the local waste planning strategy and help the Borough move up the waste hierarchy. The criteria include the 'protection of water resources'.

10.6.14 **Draft Policy 115** (Reducing flood risk) has the potential for a positive effect as it seeks to manage and reduce flooding from all sources, and to avoid inappropriate development in relation to flood risk through applying sequential and exception tests. It will also require all development proposals to reduce surface water run-off entering the sewerage network and reduce rainwater run-off through the use of suitable Sustainable Drainage Systems (SUDS).

10.6.15 **Draft Policy 116** (Sustainable Urban Drainage Systems) will require all developments to seek to incorporate SUDS or demonstrate alternative sustainable approaches to the management of surface water as far as possible. It will also require applications for developments located within Flood Zones 2, 3a and 3b and in Flood Zone 1 for areas identified as hot spots in Bromley's Surface water Management Plan (SWAMP), Preliminary Flood Risk Assessment (PFRA) and in the Local Strategy, to be accompanied by a Flood Risk Assessment (FRA). Potential for a long-term positive effect on climate change adaptation.

10.6.16 **Draft Policy 123** (Sustainable Design and Construction) will require all developments to demonstrate that the principles of sustainable design and construction have been integrated as appropriate and have been taken into account in the design process of proposals.

10.6.17 **Draft Policy 124** (Carbon Dioxide Reduction, Decentralised Energy Networks and Renewable Energy) will require major developments to aim to reduce their carbon emissions above the building regulations and in accordance with the levels set out in the London Plan. It outlines additional provisions for creating a local carbon off-setting scheme which will address shortfalls in reductions through payments in lieu.

The preferred approach 'as a whole'

10.6.18 It is critical that new development in the Borough does not lead to increased flood risk. The most effective way of managing future flood risks is to reduce exposure. Policy on flood risk recognises this, and is set to require development in Flood Risk Areas to seek opportunities to deliver a reduction in flood risk compared with the existing situation.

10.6.19 Several of the Development Management policies should further help to reduce flood risk in the Borough. Policy on SUDS should reduce surface runoff rates and increase infiltration thus lowering the risk of flooding. This effect will be enhanced by policy on backland and garden development. Taken together these policies are expected to have significant positive effects in terms of flood risk.

10.6.20 Policies aimed at protecting/enhancing green corridors and local green space should help contribute towards mitigating the urban heat island effect through providing vegetation that cools the environment and provides shade, thus having positive effects in terms of climate change adaptation, and are also a positive from a flood risk perspective.

10.6.21 Finally, policy on sustainable design and construction should help to ensure efficient use of natural resources, including water, efficiently. However, it is noted that the policy on parking is less than ideal from a water quality and flood risk perspective. It is recommended that the policy should be revised to include a maximum level of parking provision and to include a requirement for the use of permeable material in parking areas. This would help to reduce runoff rates and increase infiltration, thereby preventing increased flood risk.

10.6.22 On balance, it is appropriate to conclude **neutral effects** at this stage for the Draft Local Plan as a whole, i.e. it is not possible to conclude positive or negative effects on the baseline. Cumulative effects are most likely to arise as a result of increased demand for water resources. The incorporation of water efficiency measures in new development should help to mitigate the significance of this effect; however, ultimately water companies have a legal duty to ensure enough water is available to meet customers' needs.

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

12 INTRODUCTION (TO PART 3)

12.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

13 PLAN FINALISATION

13.1.1 Subsequent to publication of the Proposed Submission Draft Plan, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

13.1.2 If found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

14 MONITORING

14.1.1 At the current time there is only a need to present 'a description of the measures envisaged concerning monitoring'.

14.1.2 The Council has prepared a Implementation and Monitoring Framework in Appendix 1 of the Draft Local Plan. **Table 13.1** lists a selection of the Council's proposed measures, as well as any wider monitoring measures, that are of particular importance given the findings of the appraisal presented in Part 2 of this report.

Table 14.1: A selection of the Council's potential monitoring measures

Sustainability topic	Proposed indicator of note (given appraisal findings)
Biodiversity	• Change in Green Belt land (ha) • Change in Metropolitan Open Land (ha) • Change in Urban Open Space (ha) • Change in Local Green Space • Number of developments demonstrating economic, social or environmental benefits
Community and well-being	• Net additional/improved sport and recreation facilities (School provision and public accessible) • Provision of new homes • Number of affordable Homes • Number of units of specialist housing for older people • Number of developments demonstrating economic, social or environmental benefits • Number of Traveller pitches/plots • % of residential applications where education contributions are sought successfully • New permanent "Forms of Entry" provided • Completion of public realm projects (as outlined in the IDP) • Completion of transport projects (as outlined in IDP)
Landscape, townscape and cultural heritage	• Number of listed buildings demolished/ part demolished
Climate change	• Major developments meeting and exceeding carbon reduction targets, and

Sustainability topic	Proposed indicator of note (given appraisal findings)
mitigation	monies from the carbon off-setting fund spent on local projects • Capacity of renewable energy installations incorporated into major developments • Increased use of decentralised energy networks
Economy	• Number of developments demonstrating economic, social or environmental benefits • Change in B-Class floorspace in Strategic Industrial Locations (sqm) • Change in B Class floor space within locally significant industrial sites (sqm) • Number of vacant retail units (by centre) • Footfall (by centre) • Completion of transport projects (as outlined in IDP)
Water, flood risk and other climate change adaptation issues	• Major applications with Sustainable Urban Drainage Systems, and S106 agreements for drainage and flood risk infrastructure

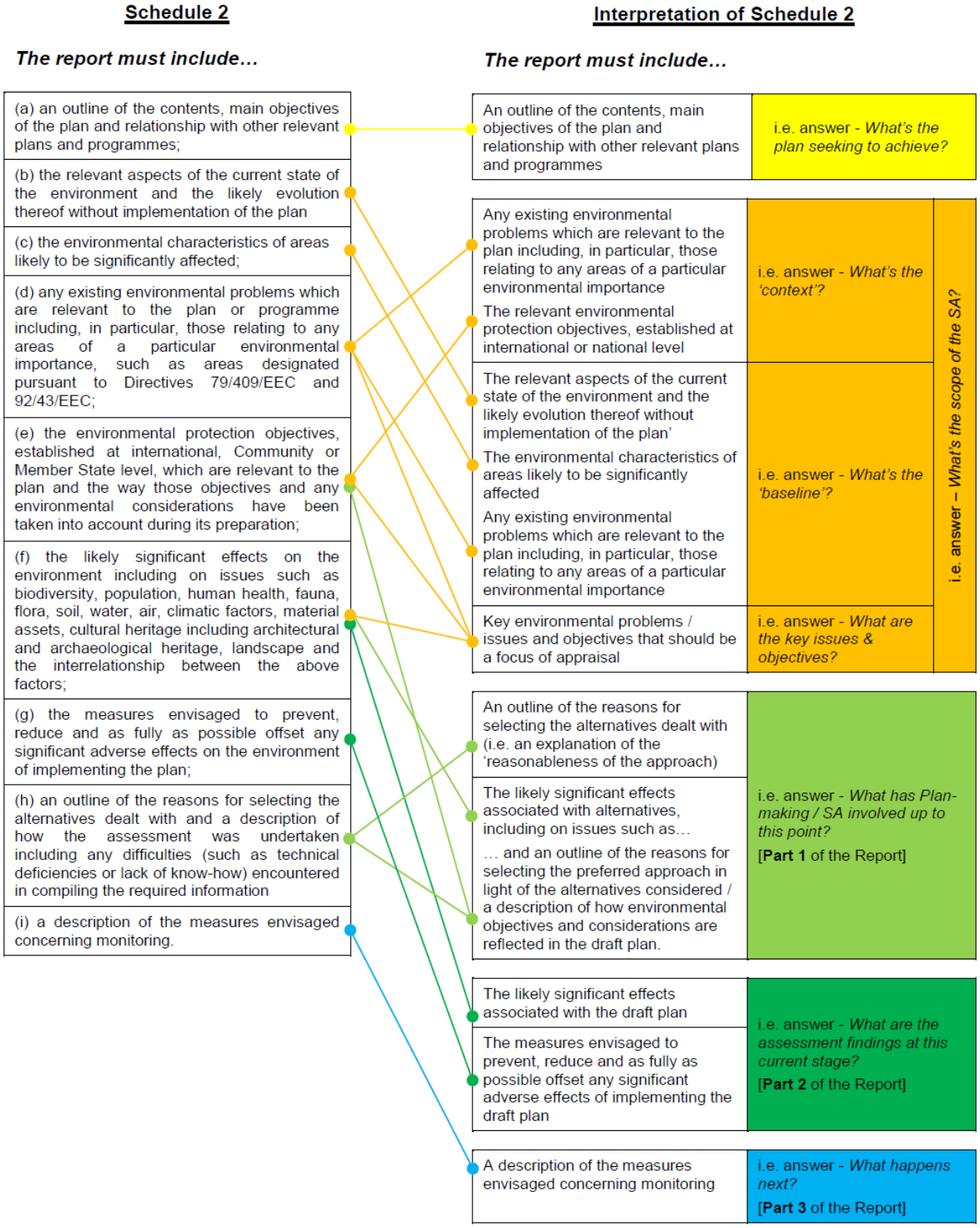
APPENDIX I: REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of the SEA Regulations

	Questions answered		As per Regulations… the SA Report must include…
Introduction	What's the plan seeking to achieve?		• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the Draft Plan
Part 2	What are the SA findings at this current stage?		• The likely significant effects associated with the Draft Plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the Draft Plan
Part 3	What happens next?		• A description of the monitoring measures envisaged

Table B: Questions answered by the SA Report, in accordance with Regulations



Whilst Tables A and B signpost *broadly* how/where this report presents the information required of the SA Report by the Regulations, as a supplement it is also helpful to present a discussion of *more precisely* how/where regulatory requirements are met - see Table C.

Table C: 'Checklist' of how and where (within this report) regulatory requirements are (or will be) met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website. The outcome of scoping was an 'SA framework', and this is presented within Chapter 4 ('What's the scope of the SA') in a slightly updated form. Also, more detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented (in an updated form) within Appendix II.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix II. With regards to explaining *"how… considerations have been taken into account"* - • Chapter 6 explains how reasonable alternatives were established in 2016 in-light of earlier consultation/SA. • Chapter 8 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	• Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation). • Chapters 10 presents the Draft Plan appraisal. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.

Regulatory requirement	Discussion of how requirement is met
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The appraisal of alternatives (section 6 and Appendix IV) and the Draft Local Plan (section 10) identifies potential mitigation measures where necessary. how the plan might potentially 'go further' in certain respects, and makes a number of specific recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 5 and 6 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 8 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Part 3 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	Interim SA Reports were published alongside earlier consultation documents, under Regulation 18 of the Local Planning Regulations. At the current time, this SA Report is published alongside the Proposed Submission Draft Local Plan, under Regulation 19, in order to ensure informed representations.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Reports, alongside consultation responses received, and findings of this SA Report, when finalising the Proposed Draft Local Plan for publication. Appraisal findings presented within the SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).

APPENDIX II: CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

Biodiversity

- There is a need to halt the overall decline in biodiversity and the degradation of ecosystem services; and restore them in so far as feasible and seek to deliver net gains in biodiversity where possible[20,21].
- Local plans should support healthy well-functioning ecosystems, encourage the 'preservation, restoration and re-creation of priority habitats, ecological networks' and promote the 'protection and recovery of priority species'.
- Local plans should adopt a 'landscape approach' to protecting and enhancing biodiversity. This focuses on the conservation of biodiversity over large areas of land (i.e. at the landscape scale) where habitat patches that are now fragmented would once have functioned more as an interconnected whole[22].
- There is a need to protecting and maximising the value of areas already rich in wildlife; expand, buffer, and create connections and stepping stones between these areas; and make the wider landscape more permeable to wildlife.
- In addition to designated nature reserves, positive action for wildlife is required in the 'wider countryside and in the urban areas', for example parks and sports grounds can be enhanced to support species, whilst continuing to provide a venue for recreation[23].
- Positive planning for 'green infrastructure' is recognised as part of planning for ecological networks and making the built environment permeable for wildlife[24]. This would also contribute to enhancing the All London Green Grid[25].
- New development should incorporate green space consisting of a 'network of well-managed, high-quality green/open spaces linked to the wider countryside[26]'. These spaces should be of a range of types (e.g. community forests, wetland areas and public parks) and be multifunctional, for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management system.

Climate change mitigation

- The need to 'support the transition to a low carbon future in a changing climate' is a 'core planning principle'[27].

[20] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[21] Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf
[22] The Wildlife Trusts (2010) A Living Landscape: play your part in nature's recovery [online] available at: http://www.wildlifetrusts.org/alivinglandscape
[23] Bromley Biodiversity Partnership (2006) The Future of Darwin's Wildlife in Bromley: the Bromley Biodiversity Action Plan 3rd Edition 2006-9 [online] available at: http://www.bromley.org/ciswebpl/bbap/specialistinfo.asp
[24] The Wildlife Trusts & TCPA (2012) Planning for a healthy environment: good practice for green infrastructure and biodiversity [online] available at:: http://www.wildlifetrusts.org/news/2012/07/06/planning-healthy-and-natural-environment
[25] GLA (2012) Green Infrastructure and Open Environments: the All London Green Grid [online] available at: http://www.london.gov.uk/sites/default/files/ALGG_SPG_Mar2012.pdf
[26] TCPA (2012) Creating garden cities and suburbs today [online] available at: http://www.tcpa.org.uk/data/files/Creating_Garden_Cities_and_Suburbs_Today.pdf
[27] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf

- Planning should play a key role in securing 'radical reductions' in greenhouse gas (GHG) emissions planning for new development in locations and ways which reduce GHG emissions27 in order to meet the targets set out in the Climate Change Act 2008[28].
- Local plans should support energy efficiency improvements to existing buildings and extensions[29].
- Local plans should positively promote renewable energy technologies and consider identifying suitable areas for their construction; working with developers to make renewable energy projects acceptable to local communities.
- Local plans should encourage transport solutions that support reductions in greenhouse gas emissions and reduce congestion; notably through concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport.
- The London Plan[30] seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. Additionally it aims for 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025, with decentralised heating and cooling networks to be prioritised; and expects development proposals to evaluate the feasibility of Combined Heat and Power (CHP) systems.
- There is a need for local plans to reduce the production of waste and use it as a resource wherever possible[31].

Community and wellbeing

- A 'core planning principle' is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all' and support vibrant and healthy communities[27].
- There is overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities[32]. To ensure that the built environment promotes health and reduces inequalities for all local populations there is a need to:
- Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
- Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by improving active travel; good quality open and green spaces; the quality of food in local areas; and the energy efficiency of housing; and
- Support locally developed and evidence-based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
- Protection and promotion of town centres is encouraged; and planning policies should promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship[33]. Developments which provides high quality social infrastructure, including education, skills and sports facilities are to be supported, and those which involve their net loss should be resisted.
- Development should be designed to help improve access to social infrastructure. Inclusive design should take into account the specific needs of older and disabled people[34]. Improving choice and

[28] The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.
[29] Committee on Climate Change (2012) How local authorities can reduce emissions and manage climate risk [online] available at: http://hmccc.s3.amazonaws.com/Local%20Authorites/1584_CCC_LA%20Report_bookmarked_1b.pdf
[30] GLA (2016 The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan
[31] Planning Policy Statement 10: Planning for Sustainable Waste (2011) [online] available at: http://www.communitites.gov.uk/documents/planningandbuilding/pdf/1876202.pdf
[32] The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf
[33] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[34] GLA (2011) The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan

independence for vulnerable people by providing the services necessary to meet their current and future health needs will help in supporting them in leading active, healthy and independent lifestyles[35].

- There is a need to reduce levels of crime, anti-social behaviour and the harm caused by drugs and alcohol; ensure safe public spaces for all elements of Bromley's communities; and to engage and empower local communities to play an active and valued role in making Bromley Safer[36].
- Local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area in order to 'boost significantly the supply of housing'[37].
- The transport system should be balanced 'in favour of sustainable transport', with developments to be located and designed to facilitate these modes of travel, in order to minimise journey lengths for employment, shopping, leisure and other activities.
- Planning policies should aim for 'a balance of land uses' and wherever practical, key facilities should be located within walking distance of most properties.
- Higher levels of walking and cycling could reduce congestion, improve local environmental quality, improve personal health and reduce transport-related greenhouse gas emissions[38]. Plans should ensure that local, high-level strategic policies and plans support and encourage both walking and cycling[39].
- Travellers should be treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community, through promoting more private traveller site provision, whilst recognising that there will be those that cannot afford private sites; enabling the provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and having due regard for the protection of local amenity and environment[40].
- The Council has a duty to give "due regard" to promoting equality of opportunity for all groups with protected characteristics when making policy decisions; and publish information showing how they are complying with this duty. 'Protected characteristics' are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Economy

- The planning system should contribute to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'[41].
- In order to revitalise town centres and high streets it is necessary for Local Authorities to re-imagine these places, ensuring that they offer something new and different that neither out-of-town shopping centres nor the internet can offer, rather than simply relying on retail provision[42].
- Retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport[43].

[35] Bromley Local Strategic Partnership (2009) Building a better Bromley – 2020 vision [online] available at: http://cds.bromley.gov.uk/mgConvert2PDF.aspx?ID=1564
[36] Safer Bromley Partnership (2008) Community Safety Strategy [online] available at: http://www.bromley.gov.uk/downloads/file/748/community_safety_strategy_2008-11
[37] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[38] Lancaster University, University of Leeds & Oxford Brookes University (2011) Understanding Walking and Cycling: Summary of Key Findings and Recommendations [online] available at: http://www.its.leeds.ac.uk/fileadmin/user_upload/UWCReportSept2011.pdf
[39] Available online @ http://guidance.nice.org.uk/PH41
[40] CLG (2012) Planning policy for traveller sites [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf
[41] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[42] High streets at the heart of our communities: The Government's response to the Mary Portas Review [online] available at: http://www.communities.gov.uk/publications/regeneration/portasreviewresponse
[43] GLA (2016) The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan

- Lower order retail and service facilities, which provide neighbourhood level provision, can provide economic resilience, act as a 'hub' for local communities, and play an important role in the shopping hierarchy because of their accessibility[44].
- Local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas and promote the development and diversification of agricultural and other land-based rural businesses[45]. The improvement of transport links and the provision of adequate digital infrastructure can facilitate the 'significant untapped potential' of rural areas to contribute to economic growth and employment[46].

Landscape, townscape and cultural heritage

- Authorities should set out in their local plan a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Assets should be recognised as being an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- The planning system should protect and enhance valued landscapes. Particular weight is given to 'conserving landscape and scenic beauty'. Local Authorities should adopt policies and measures for the protection, management and planning of all landscapes, whether outstanding or ordinary, that determine the quality of people's living environment[47].
- London Boroughs should seek to 'maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration'. London Boroughs should also seek to increase the accessibility of such cultural heritage to members of the public[48].
- Local planning authorities are encouraged to 'plan positively to enhance the beneficial use of the Green Belt, with inappropriate development in these areas not to be approved 'except in very special circumstances'.
- Local planning authorities can 'set out their own approach to housing density to reflect local circumstances' but should also look to 'encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'.

Water, flood risk and other climate change adaptation issues

- Local Plans should take account of the effects of climate change in the long term, taking into account factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape[49].
- Planning authorities are encouraged to 'adopt proactive strategies' to adaptation. New developments should be planned so that they avoid increased vulnerability to climate change impacts. Where new development is at risk to such impacts, this should be managed through adaptation measures including the planning of green infrastructure.
- Local plans should support 'greening' of the urban public realm to help reduce the urban heat island effect and encourage the design of places that avoid overheating and excessive heat generation[50].

[44] CLG (2012) Parades of shops: towards an understanding of performance and prospects [online] available at: http://www.communities.gov.uk/documents/regeneration/pdf/2156925.pdf
[45] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[46] Federation of Small Businesses (2012) The Missing Links - Revitalising our rural economy [online] available at: http://www.fsb.org.uk/policy/assets/rural_report_web_final_proof.pdf
[47] Council of Europe (2000) The European Landscape Convention [online] available at: http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm
[48] GLA (2016) The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan
[49] CLG (2012) National Planning Policy Framework [online] available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
[50] GLA (2016) The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan

- Development should be directed away from areas at highest risk from flooding, and should 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- The Flood and Water Management Act[51] sets out the following approaches to flood risk management:
- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
  - Sustainable drainage systems (SuDS);
  - Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; and
  - Identifying areas suitable for inundation and water storage.
- In terms of SuDS the plan recommends 'greenfield run-off rates' and 'close to source surface water run-off management'. Drainage systems can also deliver other benefits such as improving water use efficiency and quality, biodiversity, amenity and recreation[52].
- Local planning authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply' and should encourage and incentivise water efficiency measures at the demand side[53].

What's the sustainability 'baseline'?

Biodiversity

The current situation

Bromley has an extensive range of biodiversity-rich **habitats** that bring a wide range of environmental and social benefits to the Borough and further afield. The diversity of habitat types includes woodlands, grasslands, hedgerows and ponds and rivers. Parks, gardens, verges, small greens and even railways also offer important 'green connections'.[54]

Bromley contains a significant proportion of the Capital's important wildlife habitat. The Borough contains around one third of London's ancient **woodlands**.[55]

Designations include[56]:

- Six Sites of Special Scientific Interest including Hayes and Keston Commons (all of which are in 'favourable' or 'unfavourable recovering' condition)[57];
- 94 Sites of Importance for Nature Conservation (many of which are of regional importance) varying in size and composition from Cudham Valley to Bromley Palace Park;
- Five Local Nature Reserves e.g. High Elms, Scadbury; and
- London's only part of the Kent Downs Area of Outstanding Natural Beauty.
- There are **open space** areas of deficiency around Bromley town; and these are recognised as lacking easy public access to Sites of Importance to Nature Conservation (SINCs).[58]
- Bromley's **green corridors** form a notable part of the All London Green Grid, a strategic interlinked network of high quality green infrastructure and open spaces that connect with town centres, public transport nodes, the countryside and residential areas.

[51] Flood and Water Management Act (2010) [online] available at: http://www.legislation.gov.uk/ukpga/2010/29/contents
[52] GLA (2016) The London Plan: Spatial Development Strategy for Greater London [online] available at: https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan
[53] Defra (2011) Water for life (The Water White Paper) [online] available at http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf
[54] London Borough of Bromley (2011) Core Strategy Issues Consultation [online] available at: http://bromley-consult.objective.co.uk/portal/cs/csissues?pointId=s1302517270630#section-s1302517270630
[55] Bromley Biodiversity Partnership (2006) The Future of Darwin's Wildlife in Bromley: the Bromley Biodiversity Action Plan 3rd Edition 2006-9 [online] available at: http://www.bromley.org/ciswebpl/bbap/specialistinfo.asp
[56] London Borough of Bromley (2011) Core Strategy Issues Consultation [online] available at: http://bromley-consult.objective.co.uk/portal/cs/csissues?pointId=s1302517270630#section-s1302517270630
[57] Environment Agency (2011) Bromley, London Borough Environmental Fact Sheet [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/Bromley_2013.pdf
[58] See: http://www.gigl.org.uk

- There have been increasing **pressures on biodiversity** in Bromley due to factors including development and agricultural intensification; as a consequence some habitats and species have been in decline.[59]

The likely situation in the future (assuming no intervention through the plan)

Without the Plan the protection and enhancement of biodiversity may not be pursued as effectively at the strategic level. **Development pressure** is likely to increase as a result of Bromley's growing population, which in turn is likely to lead to an increase in pressure on Bromley's existing biodiversity assets.

Habitat fragmentation is likely to mean that many species populations struggle to adapt to **climate change** i.e. will be unable to shift in response to shifting 'climate envelopes'. Climate change will also be associated with low water levels and reduced river flows.[60]

Climate change mitigation

The current situation

The typical resident of Bromley has one of the highest **carbon footprints** in London and a particularly high level of domestic and transport greenhouse gas emissions, which is mainly due to the prevalence of pre-1945 housing in the Borough and a high level of car dependence respectively.

Bromley has an average **gas and electricity usage** figure that is above the national average. In line with the national trend it has declined over the period 2005 to 2014 however it still remains above the national average; particularly so for gas use[61].

Between 2008/09 and 2009/10, 56% of trips on any given day in Bromley were made by **private car**, which compares with an overall average for Greater London of 38%. In 2011 40.3% of people in employment travelled to work in a car or van; higher than the Greater London average of 28.0% but lower than that for England (57.0%)[62].

There has been a steady decline in **total motor vehicle traffic** in Bromley over the period from 2006 (437,762 vehicles) to 2015 (398,886)[63].

The AEA Microgeneration Index suggests that there is 0.349 MWe of installed **renewable energy** in Bromley, of which 99.8% is solar PV. As of 2015; Bromley had 1,298 domestic PV installations; below the national average of 1,773[64].

The total amount of **municipal waste** produced in Bromley has been reducing and, importantly, so has the amount being sent to landfill. Increased composting has been a significant contributor to this trend. The most recent data available shows that Bromley ranked 2nd highest out of all the Boroughs for household waste **recycling** in 2011/12 at 50%[65]

The likely situation in the future (assuming no intervention through the plan)

Per capita emissions have been falling in recent years. However, although emissions continue to fall, reducing emissions from private car use and from pre-1945 buildings represents a challenge to continuing the downward trend.

Current planning policy in Bromley requires all planning applications for major developments to include details of how the proposed development will meet or preferably exceed building regulations in terms of **energy efficiency**. This policy has been applied successfully on major developments in recent years across

[59] Bromley Biodiversity Partnership (2006) The Future of Darwin's Wildlife in Bromley: the Bromley Biodiversity Action Plan 3rd Edition 2006-9 [online] available at: http://www.bromley.org/ciswebpl/bbap/specialistinfo.asp
[60] Defra (2011) UK Climate Change Risk Assessment [online] available at: http://www.defra.gov.uk/publications/2012/01/26/pb13698-climatechange-riskassessment/
[61] DECC (2016) Gas and Electricity Consumption [online] available at: http://tools.decc.gov.uk/en/content/cms/statistics/local_auth/interactive/domestic_ge/index.html
[62] ONS (2013) 2011 Census - Method of Travel to Work (QS701EW) [online] available at www.neighbourhood.statistics.gov.uk/dissemination/
[63] DfT (2016) Traffic Counts [online] available at: http://www.dft.gov.uk/traffic-counts/area.php?region=London&la=Bromley
[64] DECC (2016) Domestic Solar Photovoltaic Installations [online] available at: http://tools.decc.gov.uk/en/content/cms/statistics/local_auth/interactive/domestic_solar/index.html
[65] Environment Agency (2011) Bromley, London Borough Environmental Fact Sheet [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/Bromley_2013.pdf

the Borough and this is likely to continue; however the policy does not apply to smaller developments of less than 10 dwellings.

Community and wellbeing

The current situation

In the 2011 Census Bromley had a **population** of 309,392[66]. The population rose by 14,400 in the ten years from 2001 to 2011, and the population is forecast to rise to 316,000 by 2021.

With 2,061 residents per square kilometre, Bromley is the least densely populated area of London[67]; however **density** varies greatly from the urban north to the rural south in the area designated as Green Belt.

Bromley's population is generally **older** than the London average with fewer residents in their 20s and 30s. Bromley has the largest population in London of residents over 85.

In a London context, Bromley has a significantly higher proportion of residents who identify as white British and therefore it also has a significantly lower proportion of Black, Asian and minority ethnic (BAME) groups than the London average. However, in a regional and national context, the number of residents identifying as white British is broadly comparable to these wider averages. In this respect, the BAME groups sharing protected characteristics in Bromley which are most prevalent are residents identifying as Black African and Black Caribbean, as well as those identifying as Asian British, 'Other white', and Indian.[68]

Regarding religion in Bromley, the majority of residents identify as Christian. This proportion is higher than London, South East, and England averages. The proportion of residents with no religion is broadly comparable to the national average, slightly lower than the South East average, but higher than the London average. Religions other than Christianity which are represented in the population include Islam (2.53%) Hinduism, (1.61%) and Buddhism (0.51%).[69]

The 2011 Census shows that the proportion of residents who feel their day to day activities are not limited by disability is slightly lower than the London average, but higher than the south east and England averages. In contrast the proportion of people who feel that their day to day activities are limited a lot by disability are lower than all other comparators.[70]

Bromley's population is comparably **healthy**, with life expectancy at birth above the national average at 81.3 (male) and 84.9 (female)[71]. However, there are **inequalities** in health and wellbeing between different groups of the population and geographical areas of the Borough including significant variations in life expectancy between wards. Life expectancy remains consistently lowest in wards including Crystal Palace, Penge and Cator.[72]

While on the whole Bromley is one of the **less deprived** Boroughs in London, there are significant **pockets of deprivation**, particularly in the northeast and northwest of the Borough. These areas also suffer the greatest employment deprivation and have the worst educational attainment. Along with Croydon, Bromley has the largest range between the most deprived and least deprived areas in London.

The level of basic **education** of Bromley residents is very good, with only 5% of residents of working age having no qualifications, compared with 8.4% of Greater London residents and 9.7% nationally[73].

[66] ONS (2013) Census 2011 [online] available at: http://www.neighbourhood.statistics.gov.uk/dissemination/
[67] Office for National Statistics (2011) 2011 Census – Population and Household Estimates for England and Wales, March 2011 [online] available at: http://www.ons.gov.uk/ons/dcp171778_270487.pdf
[68] ONS (2011) Ethnicity and National Identity in England and Wales [online] available at: http://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/ethnicityandnationalidentityinenglandandwales/2012-12-11
[69] ONS (2011) Religion in England and Wales [online] available at: http://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/articles/religioninenglandandwales2011/2012-12-11
[70] ONS (2011) QS303EW - Long-term health problem or disability [online] available at: https://www.nomisweb.co.uk/query/construct/summary.asp?reset=yes&mode=construct&dataset=532&version=0&anal=1&initsel=
[71] Public Health England (2015) Bromley Health Profile 2015 [online] available at: http://www.apho.org.uk/resource/item.aspx?RID=127125
[72] Bromley Local Strategic Partnership (2009) Building a better Bromley – 2020 vision [online] available at: http://cds.bromley.gov.uk/mgConvert2PDF.aspx?ID=1564
[73] Nomis (2014) Qualifications *in* Labour Market Profile: Bromley [online] available at: http://www.nomisweb.co.uk/reports/lmp/la/2038431878/report.aspx

Bromley contains around 131,000 households across a range of **housing** types such as flats, terraces, and bungalows; but the majority of houses are detached and semi-detached (around 50%, which is significantly higher than neighbouring Boroughs)[74]. Almost a third of households (31%) own their homes outright and almost half (44%) are buying their own home. However, housing **affordability** remains a significant issue with the average house price £374,975 in Bromley (2015), compared to the London Borough average of £465,468 London and the national average of £209,995[75]. Average house prices in the town of Bromley are currently significantly higher than in the comparable urban centres of Lewisham and Croydon[76].

The north west of the Borough has good **transport links** both within and outside the Borough, however in the south and east (where it is more rural) access to public transport remains very limited. This has a range of consequences in terms of social exclusion and **access** to services.

Compared to the London average Bromley has a high level of car ownership (1.17 cars or vans per household compared to 0.82 respectively[77]) and usage. This leads to problems of **congestion** and crowding of parked cars on residential streets. Trips made using other modes of transport included 8% of trips made by bus/tram, 6% by rail, 1% by bicycle and 29% by walking[78].

Bromley as a Borough is generally well served in terms of **parks and open space**, and also in terms of playing fields and outdoor recreation facilities[79]. It is estimated that within the Borough there is around 4 hectares of publicly accessible open space per 1000 population although areas of deficiency remain. Increased provision of facilities for children and young people is a well-recognised need in the Borough.

Bromley has one of the largest communities of **Gypsies and Travellers** in England and Europe. This group experiences the worst health and well-being of any group and is associated with significantly lower life expectancy. The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008) identified that of all London Boroughs, Bromley has the greatest need for pitches.

The likely situation in the future (assuming no intervention through the plan)

Housing affordability is likely to be a continuing issue, including as a result of reducing average household sizes. There will be a continued need for provision of both market and affordable housing.

Increases in numbers of both elderly people and infants (0-4 year olds) will result in an increase in **pressure on community infrastructure** in the future including on GP practices. Strains on primary and secondary school provision can also be expected, as can need for additional housing suitable for the needs of the elderly.

Economy

The current situation

Bromley is a distinctive part of London's suburbs that is closely connected to **London's economy**, and itself has one of the largest Borough economies south of the Thames.

Overall household **incomes** in the Borough are higher than both the London and national average. Average income varies significantly across the Borough. The average annual income within the Borough is £27,728, whilst the resident-based average annual income is significantly higher at £34,519, due to many residents commuting out of the Borough to Central London.

The **economic activity** rate in 2012/13 for people of working age for Bromley was 77.9%, which was higher than both the London (76.4%) and the UK average (77.3%)[80].

[74] South East London Strategic Housing Market Assessment 2014 [online] available at https://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base/Documents/SELondonSHMA2014.pdf
[75] London Datastore (2015) [online] available at: https://data.london.gov.uk/dataset/average-house-prices-Borough/resource/347f5ac3-919b-480f-bfd9-346349ab3da2
[76] Bromley Town Centre Area Action Plan (2010) [online] available at: http://www.bromley.gov.uk/downloads/download/194/bromley_town_centre_area_action_plan
[77] ONS (2013) Census 2011 [online] available at: http://www.neighbourhood.statistics.gov.uk/dissemination/
[78] http://www.tfl.gov.uk/assets/downloads/london-travel-demand-survey.pdf
[79] London Borough of Bromley (2011) Core Strategy Issues Consultation [online] available at: http://bromley-consult.objective.co.uk/portal/cs/csissues?pointId=s1302517270630#section-s1302517270630
[80] See: http://www.nomisweb.co.uk/reports/lmp/la/2038431878/report.aspx#tabeinact

Employment growth in Bromley has been strong compared to other Outer London Boroughs; however this has not translated into a higher value local economy. The quality of the employment activities on offer locally is mismatched to the work force's potential, given the qualifications, skills and occupation profiles of the Borough's population, many of whom work within the 'knowledge-driven' sectors[81].

The main **employment centres** in Bromley are located in the northern part of the Borough and are Bromley Town Centre, the Major Town Centre of Orpington; the District Centres of Beckenham, Penge, Petts Wood and West Wickham; and the Business Areas in St. Mary Cray, Lower Sydenham, Elmers End and Biggin Hill; with Bromley town centre being the largest.

There is a deficiency of quality 'Grade A' **office space** which is frequently identified as a significant constraint on economic development, business growth, retention, and inward investment in the Borough[82]. There is therefore a need to refurbish poorer quality office stock in Bromley town centre to attract employment and economic growth.

In terms of **retail**, Bromley Town is the largest town in the Borough and is designated as a Metropolitan Town Centre within London. The latest Retail Study[83] concluded that Bromley has capacity to accommodate a further 10,700 sq/m net of comparison floor space at 2016, with further growth by 2026 if forecast trends occur.

Biggin Hill is widely known for its airport and RAF base which played a key role in the Battle of Britain. Although the RAF left the base in the mid-1970s, the airport continues to function as a significant employer in the area handling general aviation including flight schools and international private flights, and providing an estimated 900 jobs. The London Plan has designated Biggin Hill as a Strategic Outer London Development Centre (SOLDC). As a result consideration needs to be given to the significant employment and business opportunities for the existing land in the area.

The likely situation in the future (assuming no intervention through the plan)

It is likely that the trend towards a loss of employment land will continue across the Borough. Insufficient supply of quality office floor space could have implications for the growth of higher value sectors, and in turn on local economic prosperity.

The Bromley Town Centre Area Action Plan is likely to play a key role in helping to improve the competitiveness of Bromley's town centre. Future market conditions will however play a significant role in influencing the amount of development that comes through the development pipeline in Bromley Town over the next few years.

Landscape, townscape and cultural heritage

The current situation

Just over 9000 hectares of the Borough is Green Belt or Metropolitan Open Land. It is estimated that there is about 4 hectares of publicly accessible open space per 1000 population.[84] London's only part of the North Kent Downs AONB lies at the south of the Borough.

The **character** of the built environment in the Borough has been influenced by a number of historical styles. It includes Victorian villas and terraced houses in Anerley and Penge, the Edwardian suburbs of Beckenham, and the mock Tudor houses with gardens and suburban centres of the 1930s expansion, such as in Petts Wood and West Wickham[85]. In suburban areas of Bromley, tree lined roads and avenues, parks, gardens and woodlands are **distinctive features**[85].

Bromley town centre features a strong architectural heritage. This is reflected by its designated Conservation Areas, which are found in the north and central parts of the centre. It also features a number

[81] GVA Grimley (2010) LB Bromley: Economic Development and Employment Land Study [online] available at: http://www.bromley.gov.uk/downloads/file/714/btcaap025-bromley_economic_development_employment_land_study
[82] Michael Rogers LLP (2013) Bromley Town Centre Office Market Study [online] available at: http://www.bromley.gov.uk/downloads/download/597/bromley_town_centre_office_market_study_2013
[83] DTZ (2012) Retail, Office, Industry and Leisure Study [online] available at: http://www.bromley.gov.uk/downloads/file/1590/retail_office_industry_and_leisure_study-final_report_march_2012
[84] Bromley (2014) Annual Monitoring Report [online] available at: http://www.bromley.gov.uk/downloads/file/2503/bromley_annual_monitoring_report_1_april_2013_-_31_march_2014
[85] London Borough of Bromley (2011) Core Strategy Issues Consultation [online] available at: http://bromley-consult.objective.co.uk/portal/cs/csissues?pointId=s1302517270630#section-s1302517270630

of listed and locally listed buildings. However, there are also a number of poor and under-utilised buildings and a lack of distinctive landmark buildings[86].

Recent investment in **Orpington** has led to improved accessibility and appearance. In other centres traffic dominates and there is a large amount of clutter from signs and barriers.

The Borough of Bromley contains a wide variety of **heritage assets**. These include a number of medieval houses such as Downe and St Mary Cray. Also of note are some of the best examples of 1930s suburban development. The Borough's built heritage assets include:

- 45 conservation areas. These vary in size and composition from villages (Cudham, Downe), to town centres (Bromley and Orpington Town Centres), and suburban (The Chenies, Petts Wood Elm Road, Beckenham);
- 815 statutory listed buildings. These include the Keston Windmill and Down House (all Grade I), The National Sports Centre at Crystal Palace (Grade II*) and the Crystal Palace Dinosaurs;
- 2155 Locally Listed Buildings, including many Arts and Crafts style houses;
- 7 Scheduled Ancient Monuments, including the Iron Age fortifications at Holwood;
- 5 parks which are included on the Register of Parks and Gardens of Special Historical Interest.

In 2016, the Borough's Heritage at Risk Register showed that there were 26 **listed buildings** and other structures under threat. Largely these consisted of buildings that were left vacant or in a state of disrepair. Those listed included the vacant RAF buildings at West Camp, Biggin Hill and the terraces at Crystal Palace Park[87]. The Conservation Area at Biggin Hill is listed as 'at risk'.

The likely situation in the future (assuming no intervention through the plan)

As development pressure increases due to growth in population and demand for housing, there may be an increase in **pressure on landscapes** due to release areas of open space and Green Belt for residential development.

The **quality of the built environment** is under threat from a number of sources, including development pressure and inadequate building maintenance. However, the Supplementary Planning Guidance and Appraisals that exist for all 45 of the Borough's Conservation Areas will continue to help protect the character of these areas and ensure that development is appropriate and strictly controlled.

As part of any future re-development at **Biggin Hill**, there could be opportunities for protection and enhancement of a number of listed buildings in the area. Without the Plan, there is a risk that there will not be a comprehensive strategy for the area's re-development. As a consequence it is likely that more listed buildings at Biggin Hill will fall into disrepair.

Water, flood risk and other climate change adaptation issues

The current situation

The Borough is covered by two **catchments**; the Ravensbourne and the Cray. Both rivers and many of their tributaries have their source in Bromley and flow northwards through the Borough towards the Thames. The area of land in Bromley that is within flood zones 2 and 3 surrounds the main watercourses in the north of the Borough[88]. There are approximately 9,800 properties in areas at **risk of flooding** from fluvial (river) sources in Bromley; 6% of all properties in the Borough. 81% of these properties are in areas where the likelihood of flooding is low. Large areas of the Borough have been subject to **past flooding**[89]. The last major flood event in the Ravensbourne catchment was in September 1968, which caused flooding of residential and commercial properties. Local drainage water and surface flooding occurred close to the River Cray in 1979, with the River itself flooding in 1979[90]. The risk of fluvial flooding within the urban parts of Bromley has been

[86] Bromley Town Centre Area Action Plan (2010) [online] available at: http://www.bromley.gov.uk/downloads/download/194/bromley_town_centre_area_action_plan
[87] English Heritage (2016) Heritage at Risk Register [online] available at: http://risk.english-heritage.org.uk/register.aspx?rs=1&rt=0&pn=1&st=a&di=Bromley&ctype=all&crit=
[88] Environment Agency (2013) Bromley, London Borough Environmental Fact Sheet [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/Bromley_2013.pdf
[89] N.B. Historical events are not necessarily indicative of future flooding. The regulatory and/or maintaining authority or water company could since have made improvements that mitigate flood risk.
[90] Halcrow (2008) Bromley Borough Council - Strategic Flood Risk Assessment [online] available at: http://www.bromley.gov.uk/downloads/file/954/strategic_flood_risk_assessment-bromley

greatly reduced by the construction of defences and channel alterations such as straightening and culverting. There is, however, still a residual risk of fluvial flooding due to potential failure of this **infrastructure**, for example breaching of defences or collapse of culverts.

Water quality of river water bodies in Bromley is classified as moderate or poor under the Water Framework Directive, driven predominantly by poor ecological status. Of the five water bodies monitored under the Water Framework Directive; only the Shuttle is of poor ecological status in 2012. The average **water consumption** in Bromley in 2011-12 was 165 litres per person per day (l/p/d). The five year average, calculated for Bromley, is 163 l/p/d (2007-08 to 2011-12). The Borough falls within Thames Water's 'London water resource zone'. This is classified as seriously **water stressed**.[91]

The likely situation in the future (assuming no intervention through the plan)

It is likely that hotter and drier summers will place a further strain on **water resources.** Annual flows of the River Thames by the 2050's could be over 10% lower when compared to today's values. Changes in climate may also cause increases in areas at risk of **flooding**, thereby increasing the number of properties in the Borough at risk.

[91] Environment Agency (2013) Bromley, London Borough Environmental Fact Sheet [online] available at: http://www.environment-agency.gov.uk/static/documents/Research/Bromley_2013.pdf

APPENDIX III: SITE OPTIONS

As discussed in Chapter 7, work was undertaken in 2015 to appraise site options. The site options appraisal methodology was not explicitly developed to integrate SA; however, examination of the methodology demonstrates that it did, in effect, integrate SA. Given the evidence-base available (which in turn is a factor of time and resources), it is not clear that any additional criteria could have been applied / additional information gathered in order to better reflect the SA framework ('integrate SA').

Site options appraisal findings are available within the 'Site Assessments, Housing and Mixed Use' document available at:

http://www.bromley.gov.uk/info/1004/planning_policy/153/developing_bromley_s_local_plan

The aim of this appendix is to present further information on the site options appraisal methodology. Specifically, the aim is to list the specific criteria / issues considered under the eight headline criteria.

Criteria	Specific matters taken into account
Open space and natural environment	*Open space policy designations including:* **Green Belt** – national policy designation set out in the National Planning Policy Framework (NPPF) the extent of which is established through the Local Plan. **Metropolitan Open Land** – Open land significant at the regional (London) level, policy set out in the London Plan. **Urban Open Space** – local level policy set out in the Local Plan. *Protective natural environment designations including:* **SSSI** (Site of Special Scientific Interest) – nationally significant site with a high level of protection. Sites established under the Wildlife and Countryside Act, but policies for protection are' included in Local Plan. **SINC** (Site of Importance for Nature Conservation) – locally established sites, policies for protection set out in the Local Plan **Local Nature Reserve** – policies for protection set out in the Local Plan **TPO** (Tree Protection Order) – Orders made outside the Local Plan development process but relevant policies set out in the Local Plan.
Flood risk and drainage	**Flood zones** – Environment Agency data upated quarterly. Flood zone categories set out in the Technical Guidance to the National Planning Policy Framework (NPPF). Vulnerable types of development can only be located in particular flood zones providing certain criteria are met using the Sequential Test and Exception Test set out in the NPPF. Other information such as surface water flooding – from Environment Agency data and local knowledge
Pollution	The **Air Quality Management Area** has been established where monitoring of air quality shows exceedance of air quality limits. An action plan for the area aims to control and reduce the pollutants Potential **contaminated land** identified from Council's database, local knowledge and site visits Potential noise pollution problems identified through desk based analysis and site visits
Heritage, **Character and landscape**	**Statutorily Listed Buildings** – buildings considered to have nationally significant special architectural or historic interest, listed by English Heritage. **Locally Listed Buildings** – buildings of local architectural or historic interest **Conservation Area** – designations through a separate process, but policies for development control set out in the Local Plan Local views, skyline or landmarks – local knowledge and site visits

Accessibility and community facilities	Distances to the nearest shopping centre have been measured using Google maps Distances to the nearest GP, shop, leisure centre, library, theatre, cinema and park measured in Google maps using likely walking or road route as appropriate Distances to the nearest schools measured as a straight line ("crow flies") distance from the site to the school entrance.
Transport and infrastructure	**PTAL** (Public Transport Accessibility Level) – measure of accessibility used by Transport for London (TfL) combining walking distances and public transport modes. Checked using the WebPtal tool online. Sites with a low PTAL (0-1) are calculated to be the least accessible using this methodology, sites with PTAL of 6 are calculated as the most accessible. Distances to bus stops and rail stations measured using a likely walking or road route using Google maps. Access to the site includes both identifying whether there is an existing site entrance point and the nature of roads and the road network immediately around the site. Checked on site visits. Potential additional network congestion or highway safety concerns related to the potential use, the physical relationship of the site to the surrounding road network and the scale of potential development (i.e. larger sites have more potential to add to any local congestion problems)
Business and employment	**Business Areas** (established in the Unitary Development Plan) and proposed new designations through the Local Plan: **SOLDC** (Strategic Outer London Development Centre) – Areas considered strategically important to London as a whole for growth and development of a range of uses. Principle established in the London Plan and management policies set out in the Local Plan **SIL** (Strategic Industrial Location) – key industrial land areas to be protected for business uses. Principle set out in the London Plan, boundaries established in the Local Plan. **Locally Significant Industrial Site** – policy set out in the London Plan but sites established through the Local Plan The extent of, and policies for the hierarchy of shopping centres and shopping frontages are set out in the Local Plan.
Deliverability/ ownership/ phasing	Information provided by site proposer (land owners or agents) through the Call for Sites process where given.
Other issues were highlighted by review of existing uses and features of the site in the context of surrounding land-uses.	

APPENDIX IV: SPATIAL STRATEGY ALTERNATIVES

Introduction

Chapter 7 presents summary appraisal findings in relation to the spatial strategy / housing policy alternatives. The aim of this appendix is to present detailed appraisal findings.

Appraisal methodology

Methodology is discussed in detail in Chapter 7. Essentially, for each of the sustainable topics established through Scoping (see Chapter 4), the alternatives are ranked in order of preference (1 being the highest preference) and efforts are also made to categorise performance in terms of 'significant effects' (using **red** and **green** shading). Also, ' **=** ' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them); and ' **-** ' is used to denote instances where the objective in question is not applicable.

Appraisal findings

Set out below is an appraisal of alternative approaches to addressing housing supply.

(1) London Plan target – delivered in-line with the preferred spatial strategy
(2) Higher growth strategy - with additional housing provision focused at economic growth areas

Sustainability topic	Discussion of significant effects (and discussion of relative merits in more general terms)	Rank of preference	
		Opt 1	Opt 2
Biodiversity	Both of the alternatives put forward have the potential to lead to impacts on the Borough's biodiversity. The pursuit of the London Plan target of a minimum of 641 extra homes per annum under **Option 1** will primarily involve the development of brownfield land. Such land can be highly valuable for certain forms of biodiversity, and can often be the best or only available habitat for rare and endangered species. However, the draft Policy 70 (Wildlife Features) would require any damage or loss of non-designated habitat or wildlife features to be mitigated, or for compensatory habitat to be provided by developers, so potentially preventing or limiting this impact. Achieving a higher rate of housing growth in order to support the Borough's strategic economic growth areas under **Option 2** would be likely to involve additional brownfield land take, potentially involving higher densities that could leave less space or wildlife features on site (e.g. should housing levels be increased in and around Bromley Town Centre). In addition, this approach may require the release of greenfield land, particularly in the vicinity of Biggin Hill SOLDC and at Crayfields Business Park. However, in these areas the majority of sites are free from any wildlife conservation designation (with the exceptions of Land south of Chapmans Lane and Land at Highfield Road and Beech Road). It is clear from this assessment that **Option 1** is the best performing in terms of biodiversity. Whilst **Option 2** is the lowest performing option, it is assumed that its higher housing target could be reached without allocating the two site constrained by biodiversity designations, and as such would not lead to any significant negative effects on biodiversity.	1	2
Climate change mitigation	The issue of climate change mitigation is an important one in the Borough. Bromley has one of the highest per capita carbon footprints in London and a particularly high level of domestic and transport greenhouse gas emissions, which is mainly due to a prevalence of pre-1945 housing and a high level of car dependence. In terms of the relative performance of the two options, it is important to note that **Option 1** would be capable of delivering benefits in two key ways. Firstly, the focusing of development at Bromley Town Centre	1	2

Sustainability topic	Discussion of significant effects (and discussion of relative merits in more general terms)	Rank of preference	
	would likely encourage greater uptake of sustainable forms of transport given the area's very high level of public transport accessibility (PTAL 6a). Secondly, by concentrating housing growth within this Opportunity Area, higher density development is more likely to be delivered with potential gains in terms of climate change mitigation through energy efficiency and the development of decentralised energy infrastructure (e.g. District Heating Systems). The effect of **Option 2** on climate change mitigation is very much dependant on the means by which additional housing growth is delivered. The development of greenfield land could encourage reduced density development and would be likely to take place in areas with lower public transport accessibility (e.g. site options would come into contention at locations with a PTAL score of less than two, although it is noted that commutes to strategic economic growth areas would be short). Conversely, if additional housing growth were to be concentrated in the Borough's major centres, then Option 2 could deliver greater benefits than Option 1 by further supporting public transport uptake and low carbon development. This would be supported by wider policy, as the London Plan promotes the principle of a compact city and has identified Bromley Town Centre as a Metropolitan Town Centre where housing should be intensified as part of mixed use schemes. On balance, it appears that **Option 1** is likely to be the best performing of the alternatives by a small margin. This is due to the likelihood that **Option 2** would require the development of at least some greenfield land in order to increase housing provision around areas such as Biggin Hill and the Cray Valley.		
Community and well-being	A key determinant of wellbeing is access to appropriate and affordable housing. As is the case across London, Bromley faces challenges in terms of addressing its housing needs. The 2014 SHMA for the South-East London sub region estimated the net additional dwelling requirement per annum for Bromley to be approximately 1,300 units, with an even greater demand for affordable homes (1,404 dpa). **Option 1** sets out to deliver a minimum of 641 dpa as per the London Plan target in order to assist in meeting minimum requirements across London. In doing so it will help to ensure that around half of the Borough's current housing need is met. This is likely to have positive knock on effects in terms of regenerating more deprived areas of the Borough, given the focus of development into renewal areas, the contribution new housing may be able to provide towards new and improved facilities (with new developments expected to provide appropriate social infrastructure under proposed Policy 6.3), and support for local businesses. Given that there are significant pockets of deprivation in the Borough (particularly in the northeast and northwest) and high demand for housing, the meeting of this minimum target should deliver important benefits. London Plan Policy 3.3 however notes that London's Borough's should seek not only to achieve the minimum annual average housing target, but should also aim to exceed it in order to address the city-wide housing shortfall. While **Option 1** does this, **Option 2** will deliver a greater quantum of housing and therefore make a larger contribution to addressing objectively assessed housing need, helping to secure broader benefits in terms of local regeneration and economic growth given that the additional housing would be likely be more spread across the Borough. For instance, housing growth around the strategic economic growth areas could potentially support the	**2**	**1** ☆

Sustainability topic	Discussion of significant effects (and discussion of relative merits in more general terms)	Rank of preference	
	renewal areas around the Cray Valley, Bromley Common, Orpington, and Crystal Palace; although site options around Crystal Palace and Bromley Town Centre appear currently to be limited and would require a further call for sites or a push for increased densities. It should be noted, however, that the pursuit of **Option 2** could result in development in areas with lower access to public transport and facilities, so resulting in higher social exclusion. This would most likely be the case should development occur on the Green Belt situated site options to the north of Biggin Hill. Additional development to the north and north-west of the Borough could also lead to increased car use and so worsen air quality issues that have led to the designation of an AQMA, particularly where PTAL scores are low. This impact is less likely to occur under **Option 1** given that much development is to be concentrated in Bromley Town Centre where public transport accessibility is very high. Overall, it is apparent that **Option 2** is the strongest performing of the two alternatives given its greater potential to narrow the gap between housing supply and demand, so potentially delivering regeneration and economic development. Meanwhile, by meeting the minimum requirements of the London Plan, **Option 1** is likely to lead to similar benefits, albeit to a lesser extent. However, this is ultimately dependant on the level of growth delivered through **Option 1** as 641 dpa is a minimum. As a result both alternatives are anticipated to result in **significant positive effects** on the baseline		
Economy	The FALP 2015 sets out revised projections for employment growth in the Borough at a rate of 13.6% (16,000 jobs) between 2011 and 2036. This represents a significant rate of increase. In order to support such growth, the London Plan identifies Strategic Outer London Development Centres (SOLDCs). These areas have economic functions that operate above the sub-regional level. Within the Borough, Biggin Hill, the Cray Valley, and Crystal Palace are identified as SOLDCs. Bromley Town Centre is also identified in the London Plan as having strategic economic significance. It employs around a fifth of all employees in the Borough and is designated as a Metropolitan Town Centre. Under **Option 1** the majority of the housing growth proposed is to be established in the vicinity of Bromley Town Centre area. This may help to support business growth in this area by increasing footfall and allowing businesses to base themselves near to their employees. Developer contributions such as improved facilities could also aid regeneration and so secure a more pleasant local environment with the ability to attract new businesses. It is anticipated that **Option 2** will deliver similar benefits but on a greater and wider scale given its focus on delivering a higher number of homes per annum across a broader area. For instance, it is estimated that business development at the Biggin Hill SOLDC could lead to the creation of around 3,000 jobs in the area over 15-20 years. By encouraging housing development to the north of the site or on the outskirts of Biggin Hill through green belt release, this alternative could make this site more attractive to businesses and their employees, so supporting its economic potential. However, under this alternative it would be crucial to avoid the loss of potentially vital employment land (e.g. quality office space which has been identified as a significant constraint on economic development in the Borough). For example, three of the six site options in the Cray valley renewal area are designated business land with a range of industrial and		

Sustainability topic	Discussion of significant effects (and discussion of relative merits in more general terms)	Rank of preference	
	office buildings and parking and so would represent an economic loss should they be developed under Option 2. Assuming that losses to key existing or potential employment land would be prevented, it is clear that **Option 2** is the strongest performing of the two alternatives in terms of economic development within the Borough and is likely to lead to **significant positive effects**. It should also be noted that **Option 1** is also likely to lead to positive benefits in terms of attracting businesses by focusing new housing into the key economic growth area of Bromley Town Centre.		
Landscape, townscape & cultural heritage	The importance of the landscape of Bromley is demonstrated by the multiple designations that serve to protect it. In total, over 9000ha of the Borough consists of Green Belt, Metropolitan Open Land or Urban Open Space, representing about 60% of the total area. Under **Option 1** impacts on the landscape character of the Borough will be avoided as this alternative sets out to deliver housing growth in brownfield sites within the more urbanised north. This development has the potential to result in impacts on townscape and cultural heritage, although policies will direct tall buildings to appropriate areas (through the Bromley Town Centre AAP). In addition, focusing housing development in the town centre may help to protect the suburban character of other areas of the Borough, In contrast, **Option 2** has the potential to have a greater impact on the landscape should a decision be taken to release greenbelt land to support growth in more rural areas, such as in the vicinity of the Biggin Hill SOLDC. However, it should be noted that the extent of these impacts would depend on the nature of the greenbelt sites selected, with the cluster of sites north of Biggin Hill airport not expected to impact upon local views (with the exception of Layhams Farm, dependent on development scale). Given that permission to build on Green Belt land will only be granted in 'very special circumstances', it is also the case that **Option 2** could have to pursue a brownfield, density led strategy. In this case, there wold be a greater risk of impacts on the Borough's townscape and cultural heritage, such as the suburban character of much of its urban areas. These could however be mitigated by directing additional development to areas of existing higher density, such as within Bromley Town Centre. It should also be noted that any additional development in or around the Crystal Palace SOLDC would need to be in keeping with the setting of the Crystal Palace Park Conservation SPG. Overall, it is clear that **Option 1** is the best performing of the alternatives given that it is more likely to focus development onto brownfield land and at lower densities than **Option 2**, thereby helping to better protect the character and heritage of both urban and rural areas of Bromley.	1	2
Water, flood risk and other climate change adaptation issues	The risk of fluvial flooding within the urban parts of Bromley has been greatly reduced by the construction of defences and channel alterations such as straightening and culverting. However, additional development in the Borough is likely to result in increased paved surface areas which will reduce the ability of water to infiltrate into the ground, so increasing the risk of surface water flooding. As a result, both **Option 1** and **Option 2** have the potential to increase surface flood risk, with the latter potentially having a more negative impact due to the greater quantum of housing targeted. However, the adoption of mitigation measures such as SuDS could help to reduce this risk. It should also be noted that the parts of Bromley Town Centre are subject to fluvial flood risk, particularly areas located to the south of railway. Whilst both Options direct development into this centre, **Option 2**	1	2

Sustainability topic	Discussion of significant effects (and discussion of relative merits in more general terms)	Rank of preference	
	is likely to increase levels of housing here by a greater amount, so potentially increasing exposure to flood risk. Bromley falls within Thames Water's 'London water resource zone', which is classified as seriously water stressed. However, the Borough is not thought to be any more water stressed than other locations in London or the South East, and it is fair to assume that if housing need is not met in Bromley then it will have to be met elsewhere in the region. As a result, neither of the Options are considered to preferable in this respect. The results of this assessments suggest that there is no major difference between the two Options. It seems however that **Option 1** performs somewhat better given that it could result in a lower paved area and less exposure to fluvial flood risk, although mitigation measures could be taken to avoid these risks under **Option 2**.		

Summary

Looking across the appraisal findings it is clear that **Option 1** [London Plan target] ranks highest in a number of respects, namely in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk. By meeting the minimum target for housing delivery target set by the Further Alterations to the London Plan (2015), this option should also lead to significant positive effects in terms of community and wellbeing, including on the basis that it would support regeneration within the Borough's renewal areas.

The pursuit of **Option 2** (higher growth) could lead to greater negative effects in terms of biodiversity, climate change mitigation, landscape, townscape, and flood risk, given the likelihood of additional land take. However, these impacts could be reduced through a balanced spatial strategy, with housing density increased in suitable areas (e.g. through a review of the Bromley Town Centre AAP) and areas of designated open space (UOS/ MOL and Green Belt) carefully selected. Where negative impacts cannot be avoided through such a spatial strategy, mitigation measures could be utilised, such as the restoration of wildlife features or the installation of Sustainable Drainage Systems (SuDS). Importantly, by exceeding the FALP 2015 minimum target through a balanced spatial strategy and mitigation measures, **Option 2** would be likely to deliver significant positive effects in terms of addressing the Borough's need for new and affordable housing, and its economic growth ambitions in the SOLDCs, at Cray Valley and within Bromley Town Centre.