

# **Community Infrastructure Levy Draft Charging Schedule (DCS)**



**Consultation Statement including  
Schedule of Representations to the CIL  
Preliminary Draft Charging Schedule  
Consultation (2018) and CIL Draft  
Charging Schedule Consultation (2020)**

January 2021

London Borough of Bromley Planning Policy and Strategy

T: 0208 313 4344

E: [LCIL@bromley.gov.uk](mailto:LCIL@bromley.gov.uk)

## **1. Introduction**

1.1 This document sets out the consultation activities undertaken during the development of the London Borough of Bromley Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS); this includes details of representations received and the Council's response to these representation, in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) ("the Regulations"). The proposal for a CIL in the Borough began in late 2017; at the time of initial public consultation (January 2018) on the Preliminary Draft Charging Schedule (PDCS), the Council was required to follow Regulation 15 of the Regulations ('Consultation on a preliminary draft charging schedule'); Regulation 15 – which included the requirement for a PDCS - was revoked in September 2019 by amendments to the Regulations (2019, No 1103). Following a review of the responses received, and commissioning of further evidence, a Draft Charging Schedule (DCS) was produced in late 2020 and put forward for consultation under Regulation 16 ('Publication of a draft charging schedule') for a six-week period beginning on 6 November 2020 and ending on 20 December 2020.

## **2. Consultation on the Preliminary Draft Charging Schedule (22 January 2018 to 9 March 2018)**

2.1 Over 400 letters were sent to those registered on the Council's consultation database, including residents, local groups, neighboring planning authorities and statutory consultees. A press notice was also issued by the Council and an advert placed in the local press (see Appendix A). Documents were made available on the Council's website and at key deposit points.

2.2 17 responses were received (Table 1) to which the main representations were:

- How the Levy would be spent.
- Differential rates for Town Centre sites.
- Taking account of the (then proposed) MCIL2 revised Mayor of London Charging Rate.
- A broader range of development typologies to be tested for viability.

2.3 Matters in relation to spending will be covered post the introduction of CIL, via the annual Infrastructure Funding Statements introduced under the 2019 amendments to the CIL Regulations; the Infrastructure Delivery Plan (IDP) was also updated to reflect this. Further Viability evidence was commissioned (document reference: LBB-002) which increased the typologies of developments included in the assessment, and specifically comments on the viability of Town Centre sites. The viability assessment was also updated to include the (now in effect) MCIL2 rates and any changes to Local Plan policies.

## **3. Consultation on the Draft Charging Schedule (6 November 2020 to 20 December 2020)**

3.1 Following a review of the revised viability evidence, the Council determined that the proposed single residential rate across the whole of the borough was still viable. Furthermore, the revised evidence now reported that a higher rate could be supported for purpose-built student and shared-living accommodation.

3.2 A revised schedule was then put forward for consultation under Regulation 16. Approximately 1,500 emails and 500 letters were sent) to all individuals and organisations

on the Council's planning policy consultation database; those who responded to the PDCS and those who expressed an interest to be notified of CIL consultations. Letters including a copy of the DCS and the Statement of Representations Procedure were sent to the designated 'Consultation Bodies'. A notice was placed in local media, and all relevant documents were placed on the Council's website - [https://www.bromley.gov.uk/info/1004/planning\\_policy/1179/bromleys\\_community\\_infrastructure\\_levy](https://www.bromley.gov.uk/info/1004/planning_policy/1179/bromleys_community_infrastructure_levy) - which was referenced on all consultation notifications. An online questionnaire was also set up on Survey Monkey. Further details of how the DCS consultation addressed relevant legislation is set out in the compliance statement (document reference: LBB-008).

3.3 18 responses were received (Table 2), none of which expressed a request to be heard at the examination. The main representations were:

- How the Levy would be spent.
- Some divergence on support for the proposed rates, including the revised rates for shared living and that in some cases higher rates could be introduced.
- That the proposed residential rate should be reduced in Town Centres, Renewal Areas and Opportunity Areas.

#### How the Levy will be spent

3.4 Upon adoption of CIL, the Council will take forward proposals for the identification of CIL spending priorities, guided by the principles contained in the national Planning Policy Guidance<sup>1</sup>. This will be represented in a revised 'CIL Guidance note' (current draft provided as part of submission documents, see document reference: LBB-005) including details on the proposed expenditure of the 'neighbourhood proportion'; this will also be reported and reviewed in future annual Infrastructure Funding Statements. The Council's Planning Obligations SPD will also be amended to reflect the balance between the use of S106 and CIL.

3.5 The IDP (document reference: LBB-003) reports the infrastructure requirements to deliver the Local Plan, which was developed in consultation with key infrastructure providers. The IDP, which will be reviewed regularly, currently reports an identified funding gap of at least £93 million; this significant funding gap sufficiently addresses the requirement under Regulation 14(1)(a) and (5) of the Regulations.

#### Divergence on the proposed rates

3.6 Six responses were received from residents and local community / interest groups with differing views on the proposed rates. Three responses agreed with the proposed single residential rate; a further response proposed the rate should be lower (as they deemed it unaffordable) while another proposed that the rate should be increased (given they have remained static from those proposed in early drafts). One response reported that they did not support the increased rate for shared living, but that the rate for retail warehousing should be increased.

3.7 None of the above responses included any alternative proposals or disputed the viability evidence. As such the Council consider the rates are appropriate given the evidence presented.

---

<sup>1</sup> <https://www.gov.uk/guidance/community-infrastructure-levy#spending-the-levy>

## Residential rates in Town Centres, Renewal Areas and Opportunity Areas.

3.8 Three separate responses were received via Montagu Evans, representing three clients: Countryside Properties; Countryside Properties and The Riverside Group; and Areli Real Estate. The responses were largely the same, but with bespoke reference in each response to specific sites in the Borough that each client owns; and different policies which apply to these sites. The responses raised concern over the introduction of a single residential rate, and that the Council should consider a varied rate to represent key areas of proposed redevelopment, namely Town Centres, Renewal Areas and Opportunity Areas. The responses broadly assert that the rates as proposed in such areas will undermine the Council's ability to deliver local plan requirements for housing delivery; however, no specific alternative rates were proposed nor was the viability evidence called into question.

3.9 The Council have fully considered the potential introduction of a variable residential CIL rate through the CIL viability assessment (document reference: LBB-002). Paragraphs 30-32 of the document summarise the report findings and it is specifically noted that *"it cannot be certain that, compared with a rate set at a level of c. £100/sq. m borough-wide, an apparently more targeted approach would be significantly more responsive or beneficial. While that might be more relevant were a suitable general rate being put forward at a much higher level (to which the viability assessment does report possible in some circumstances), compared with the suggested flat-rate approach, any differential would be relatively small in both in monetary terms and in the context of CIL as a modest proportion of development value of cost."*

3.10 The CIL viability assessment used a number of development typologies and locations that reflect development that the Council expect to come forward in Bromley. The viability evidence shows that a £100 per sqm flat rate is appropriate. It is noted that neither the Regulations nor national Planning Practice Guidance (PPG)<sup>2</sup> (Paragraph: 022 Reference ID: 25-022-20190901) have an explicit requirement to introduce differential charging rates – it is at the discretion of the charging authority, reflecting local context. The PPG is clear that differential rates should not be used as a means to deliver policy objectives. No evidence has been put forward that contradicts the viability evidence or offers a detailed account of how specific policy aims will be affected. As such the Council consider the rates are appropriate given the evidence presented.

---

<sup>2</sup> <https://www.gov.uk/guidance/community-infrastructure-levy#charging-schedules-and-rates>

**Table 1: Schedule of Representations to the CIL Preliminary Draft Charging Schedule Consultation (January to February 2018); and LB Bromley responses**

ID	Organisation	Summary of Representation	Council's Response
PDCS-001	Resident	What rules will be in place to ensure that the levy is spent on the relevant infrastructure rather than being treated as an addition to the Council Tax?	Specific Governance arrangements of local CIL have yet to be decided however the list of specific infrastructure projects on which CIL can be spent will be compiled and published in compliance with Government CIL Regulations via the requirement to produce an 'annual Infrastructure Funding Statement'
PDCS-002	Natural England	The topic of the Community Infrastructure Levy Charging Schedule does not appear to relate to interests to any significant extent. Therefore do not wish to comment.	Noted
PDCS-003	Highways England	Development contributions towards SRN improvements would be secured via S278 agreements, and not via a CIL Reg123 List or S106. The use of S278s will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement.	Noted
PDCS-004	Clarion Housing Group	We very much support Bromley establishing a CIL as we believe this to be a clearer, more transparent method of local authorities funding infrastructure. It also provides housebuilders with more certainty upfront in terms of costs and makes the building of affordable homes more attractive.	Support noted
PDCS-005	Sport England	Support for addressing site specific matters under s106.	Support noted
		However, SE does not support the approach for collecting s106 for new sporting infrastructure as set out in the 123 list under the very broad categories of open space and health and wellbeing.	Noted
		The IDP approach for provision of open space and built sport facilities does not work for sports facilities as it accounts only for quantity of the facilities, not the quality.	Noted
		SE remains of the view that the Council should undertake a playing pitch strategy and a built sports facilities strategy at the earliest opportunity. This is supported by the current NPPF (paragraph 71), the draft NPPF (paragraph 97) and the draft London Plan further highlights the requirement for the Council to undertake a Playing Pitch Strategy (see paragraph 5.5.4).	Noted.
PDCS-006	GLA	The Mayor welcomes the principle of Bromley seeking to secure appropriate developer contributions in order to support the funding and delivery of improved infrastructure.	Noted
		Issues arising from the consultation including the MCIL2, and Indexation, should be discussed in a meeting with the GLA.	Meeting undertaken with GLA and TfL April 2018. Agreed Viability refresh necessary. This has been undertaken in the 2020 DSP report.
PDCS-007	Civic Society	Clarity is needed on items of infrastructure that could be funded through CIL, and for arrangements of spending funds that are received.	This will be undertaken as part of future annual Infrastructure Funding Statements
		What is the scope for using the funds obtained through the CIL for the support of non-commercial, cultural community facilities such as arts centres, galleries and venues for performance arts and music? Such support will be needed in Bromley Town Centre where there is a substantial increase in the population arising from planned development and demand for retail floorspace has plateaued.	As above
		What is the scope for using the funds obtained through the CIL for the restoration and re-use of heritage assets or for the promotion and interpretation of an area's heritage? Such measures are important in Bromley Town Centre where heritage is under pressure from increased intensification.	As above
		In the PDCS section entitled 'Neighbourhood Plans' it says 'Neighbourhoods without a Neighbourhood Development Plan, but where the CIL is charged will receive a capped share of 15% of the levy arising from development in their area.' How and to whom will this 'capped share' be paid? Will it be necessary to have a Neighbourhood Forum in place or a Neighbourhood Planning Area defined before the money can be paid?	As above

ID	Organisation	Summary of Representation	Council's Response
		In the PDCS section entitled 'Neighbourhood Plans', that: 'The Council must agree with the local community how to spend the money'. What is the process for this and how is the 'local community' defined?	As yet not defined – this will be considered once CIL is adopted
PDCS-008	BE Living	BE Living are critical of no differential between sites especially town centre sites and despite noting this was considered it is not clear as to why this was discounted. The delivery of these sites is critical the delivery of the Plan. Bromley cannot demonstrate that it has struck an 'appropriate balance' Reg14 (1).	The Council acknowledge this observation, which is covered in the Viability report update by DSP (2020). The Council consider that a flat rate is more practical approach and has been deemed affordable.
		Viability evidence does not specifically assess the viability of town centre sites allocated for residential development in the draft Local Plan. This is considered a major shortcoming of the viability evidence.	This has been covered in the DSP 2020 viability review.
		Bromley Town Centre and in particular Bromley North Station would be rendered unviable. Viability matters should be reviewed. Propose Bromley North brought forward under s106 and s278 regime.	This has been covered in the DSP 2020 viability review. The testing of CIL is not required to demonstrate viability of specific sites and specific development models.
		Has potential to prejudice the delivery of the Local Plan. Setting of an unrealistic high CIL rate places Local plan policies at risk. Residential rate put an unreasonable burden on town centre sites.	See Above
PDCS-009	Environment Agency	States it is essential that key environmental infrastructure elements are embedded in the Community Infrastructure Levy documents. The response points out that Capital funding sources must be identified and a clear commitment shown to the provision of infrastructure before new housing is allowed to proceed so as to mitigate the impact and not make any deficiencies worse. Information is given regarding flood schemes being currently assessed in the Borough, and schemes that contribute to outcomes for 2021.	LB Bromley can confirm that all schemes and data mentioned were included in the LB Bromley Infrastructure Delivery Plan (IDP) 2016 (since updated in 2020) which also forms part of the evidence base for the CIL as well as the Local Plan) and also the draft Local Plan IDP schedule Appendix 10.13.
		Consideration should be given to whether it would be best to include schemes in the Reg 123 list or that they remain within the s106 approach.	Regulation 123 no longer applies – further commentary o the prioritisation of CIL will be covered in future annual Infrastructure Funding Statements
PDCS-010	St William (Berkeley Group and National Grid)	Currently the PDCS applies a flat rate of £100 per m <sup>2</sup> to chargeable residential development across the Borough. Whilst this may be the simplest approach, St William are of the view that the Council should consider setting a variable rate to account for the varying viability of residential development across the Borough. As the PDCS notes, the key driver of development is local values. For instance a flat rate below £100 per m <sup>2</sup> should be considered for the north west of the Borough. This would accord with CIL Guidance which makes clear that Councils can set differential rates by area stating that:  <i>"If the evidence shows that the area includes a zone, which could be a strategic site, which has low, very low or zero viability, the charging authority should consider setting a low or zero levy rate in that area."</i>	The Council acknowledge this observation, which is covered in the Viability report update by DSP (2020). The Council consider that a flat rate is more practical approach and has been deemed affordable
		Assumes that the CIL viability assessment produced in 2015- 2016 will be updated as the CIL Charging Schedule is progressed to ensure that the overall delivery of the Local Plan, including the much needed delivery of affordable housing, is not adversely impacted.	Updated by the 2020 DSP Viability report
PDCS-011	Transport for London	TfL has two main concerns, which need to be corrected for the Draft Charging Schedule, is that your proposals/appraisals have generally failed to take account of the Mayor's revised proposals for his own CIL (MCIL2), together with the current MCIL and the Indexation rate is incorrect.	Updated by the 2020 DSP Viability report

ID	Organisation	Summary of Representation	Council's Response
PDCS-012	Hta (Riverside Group)	Recommends that the infrastructure delivery plan be revised to reflect the significant uplift in the borough's housing target as set out in the Draft London Plan (due to be adopted 2019).	Infrastructure Delivery Plan updated in 2020
		Recommends that the financial viability assessments take into consideration the full range of planning policy requirements set to be introduced within the replacement London Plan (due to be adopted in 2019).	Updated by the 2020 DSP Viability report
		Recommends that the financial viability assessment be tested using the proposed MCIL2 rates which are set to come into force from 2019, to coincide with the introduction of the LB Bromley CIL, which proposes an increased MCIL of £60/sqm (increased from £35/sqm in the currently adopted MCIL1).	Updated by the 2020 DSP Viability report
		Recommends that the financial viability assessments underpinning the CIL rates test a wider range of development types within the borough, including higher density development, and build to rent, and estate regeneration projects, and ensure that these accurately reflect the associated build costs, including the costs of expensive parking solutions, to provide a more realistic set of assumptions to underpin viability assumptions.	Updated by the 2020 DSP Viability report
		Recommends that the Council consider setting differential CIL rates across the borough, with the lower CIL rates in the renewal areas, to support the objectives of the development plan.	The Council acknowledge this observation, which is covered in the Viability report update by DSP (2020). The Council consider that a flat rate is more practical approach and has been deemed affordable
		Recommends that the Council include provision for discretionary relief in exceptional circumstances, (such as in the case of estate regeneration projects which can be encumbered with significant development costs not associated with typical developments) within the CIL Charging Schedule.	Based on the viability evidence, the Council considers the rates to be affordable and does not envisage the need for further relief measures. The Councils approach to relief will be covered in a CIL Operational Guidance document.
PDCS-013	Lambert Smith Hampton (Met Police)	Concern that no infrastructure costs identified for the Metropolitan Police (MPS) in the IDP. Considers CIL charges to support policing at Borough Level are necessary and appropriate. There is no mention in the PDCS the collection of CIL payments to fund policing infrastructure. MPS believes there is a strong case for inclusion of funding for policing infrastructure due to envisaged growth in the delivery of new homes, commercial space, and employment over the Draft Local Plan period which will significantly increase the need for policing and the cost for associated infrastructure. The respondent states this represents a legitimate infrastructure requirement that should be accounted for within Bromley CIL and includes quotes from 2 planning appeal cases whereby the Inspectors supported financial planning contributions in principle for police equipment and other items of capital expenditure.	Infrastructure Delivery Plan updated in 2020 in consultation with the Met Police
PDCS-014	Network Rail	It is necessary to seek alternative funding sources and Network Rail call on LB Bromley to invest revenue to improve London's railway and welcome the commitment in the CIL Regulation 123 list to support the Borough's and Mayor's transport priorities and seek third party funding contributions to the railway. Proposed levy in relation to Bromley Town Centre allocated sites and in particular Bromley North Station one of the largest site allocations, would potentially render development unviable prejudicing the achievement of strategic objectives that are central to delivering sustainable development in the borough. The site carries significant 'abnormal' costs than development elsewhere without constraints of replacing existing infrastructure such as a TfL bus stand, multi-storey carpark, station improvements etc and should not be subjected to an additional CIL cost – new infrastructure should be secured through s106 contributions as opposed to Reg 123 list. The charging schedule shows no differential between sites especially town centre sites, and it is not clear why this was discounted. In order to preserve the wider green belt, the delivery of these sites is critical to the delivery of the Plan and the proposed Charging Schedule should not prejudice this in any way. It is therefore imperative that the schedule is amended to better reflect the abnormal nature of the Bromley North site.	Regulation 123 no longer applies – further commentary on the prioritisation of CIL will be covered in future annual Infrastructure Funding Statements. The testing of CIL is not required to demonstrate viability of specific sites and specific development models. The Council consider that a flat rate is more practical approach and has been deemed affordable
PDCS-015	Dron & Wright (London Fire & Emergency Planning)	The following LEEPA sites in the borough are, Beckenham Fire Station, Biggin Hill Fire Station, Bromley Fire Station and Orpington Fire Station. Fire stations would fall under 'other forms of development' and therefore Nil rated which is welcomed as fire stations are a vital community safety facility.	Welcome noted.

ID	Organisation	Summary of Representation	Council's Response
		Bromley and Biggin Hill Fire Stations are priorities for improvement, requiring replacement/refurbishment, costs are unknown at this stage but LEEFA requests fire-fighting facilities are added to the borough draft Reg 123 list and are considered for funding/part-funding by CIL.	Request noted.
PDCS-016	Aperfield Green Belt Action Group	Welcomes information on proposed changes and are pleased to learn developments in and around Bromley (Town Centre) will provide the majority of housing needs.	Support noted.
PDCS-017	Parish of SS Joseph & Swithun	No comment at this stage.	Noted

**Table 2: Schedule of Representations to the CIL Draft Charging Schedule Consultation (November to December 2020); and LB Bromley responses**

ID	Organisation	Summary of Representations	Council Response
DCS-001	NHS London Healthy Urban Development Unit	<p>We support the nil rating of health and related facilities in line with other London boroughs. We note that residential development which delivers additional care and support services will also be zero rated. While we understand that there are viability issues with regard to this type of development, we would ask that the Council continues to secure contributions from developments to mitigate their impact on health infrastructure through S106 agreements for these and other developments.</p> <p>The Infrastructure Delivery Plan included in the consultation process does not include the health projects which have been shared with the Council. Please can you advise when an updated IDP will be published including these? Should you require any further detail before publication please can you liaise directly and keep me advised of timescales.</p>	Support noted. Officer contacted the respondent and clarified that the IDP was updated with the latest information as of September 2020, and that revisions would likely take place at regular intervals which gives opportunity for inclusion of additional projects.
DCS-002	Transport for London	<p>We are pleased to see amendments to the draft charging schedule based on our previous comments, including the reference to the MCIL2 Charging Schedule which took effect on the 1 April 2019. We are also pleased that the MCIL2 rate of £60 per square metre (applicable to CIL liable development in LB Bromley) is a consideration in the CIL viability updated evidence to support the borough-wide rates proposed. However, there are several matters that require clarity, which have been set out below.</p> <p>The CIL Regulations were amended in September 2019 and the formula for calculating CIL in England set out in Schedule 1. In the section entitled 'Liability to pay CIL', it would be clearer if reference was made to Regulation 40, Schedule 1. Also, the link to the Mayoral CIL web page is out of date and should be amended to: <a href="https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/mayoral-community-infrastructure-levy">https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/mayoral-community-infrastructure-levy</a>.</p> <p>We note that Table 3.3 of the Infrastructure Delivery Plan (IDP) refers to transport infrastructure costs (for example, rail, DLR, and BLE) being funded in whole or part from CIL. Paragraph 3.32 also mentions that Network Rail station enhancements would be funded in part by CIL (and section 106) and this is welcomed. However, transport infrastructure is not specified as one of the priorities for CIL funding in the IDP Schedule (Appendix 1). While, there is no longer a legislative requirement to produce a Regulation 123 List setting out projects, or types of infrastructure intended to be funded or part funded through CIL, authorities are required to set out infrastructure priorities for the forthcoming year in the Annual Infrastructure Funding Statement. To positively plan for infrastructure delivery, it would be useful to have an indication of the transport priorities for CIL spend in advance of this. This will enable priorities to be aligned with those of TfL as early in the process as possible. We do appreciate that authorities are faced with competing priorities for CIL funding; however, TfL looks forward to working closely with you in ensuring that necessary transport infrastructure is prioritised and delivered in the borough to aid both the delivery of the local and London Plan, the Mayor's Transport Strategy and enable Good Growth</p>	<p>The DCS references all the operational provisions for liability and calculating CIL charges. Schedule 1 is a subset to Regulation 40, which is already referenced; therefore, further reference to schedule 1 in the DCS is considered unnecessary. In order to incorporate any future amendments to the regulations post adoption of the DCS, reference is made to the 'CIL Operational Guidance' produced by the Council which covers these matters in greater depth and clarity - this includes direct reference and reproduction of Schedule 1.</p> <p>The weblink in the DCS is correct and is the same as the one suggested by TfL in their response.</p> <p>We note work to identify CIL spending priorities has commenced. The Council has published its first Infrastructure Funding Statement (IFS) and will continue to report annually as per regulatory requirements.</p>
DCS-003	Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England have no comments to make on this consultation.	Response noted
DCS-004	Aperfield Green Belt Action Group	Whilst we are focused on the protection of the Green Belt and green spaces, we feel that the figures quoted appear proportionate and trust the charges made will be used for infrastructure and not other issues.	Council note support. Infrastructure priorities will be identified and use of CIL will be reported annually in the IFS.
DCS-005	Highways England	<p>Our interest in such strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically, how local authorities set and implement policy to manage trip demand and ultimately how these might contribute to the safe and efficient operation of the Strategic Road Network for which we are responsible. For Bromley, our interests lie in the M25 and A20.</p> <p>It should be noted that, in accordance with MHCLG guidance, any development contributions towards SRN improvements would usually be secured via S278 agreements, and not via a CIL Reg123 List or S106. The use of S278s will enable multiple sites to contribute if appropriate, and also secures the Secretary of State's position by ensuring that 100% of contributions go towards the SRN improvement.</p>	The Council note use of S278 agreements for improvements required on the SRN, and will consult Highways England on relevant planning applications
DCS-006	Sport England	<p>Sport England is pleased to note that sports facilities do not appear to be liable to pay CIL.</p> <p>Most community sports facilities such as leisure centres, playing fields etc are operated by local authorities, clubs and voluntary organisations on a not for profit basis to meet community needs. If CIL was charged for new facilities, or enhancements to existing facilities, this may have viability implications for implementing the proposals.</p> <p>Sport England is therefore supportive of the schedule as currently set out.</p>	Council note support,

ID	Organisation	Summary of Representations	Council Response
DCS-007	Environment Agency	<p>The existing environmental infrastructure may require updating and increased funding to ensure it is able to deal with more extreme weather events due to climate change. The EA2025 plan and the government 25-year environment plan show the need for infrastructure to be regularly inspected and maintained to high standards and ensure it is resilient to more extreme weather events. For example, flood defences across Bromley may require upgrading / replacing if they experience more pressure from increased numbers of flooding events. Also, existing waste management sites may require upgrading and new modern buildings to prevent odour issues during warmer summer events. We recommend mapping the status of the current environmental infrastructure across the borough and then map the future infrastructure requirements to support the proposed housing growth. We recommend integrating environmental infrastructure to deliver multiple environmental, social and economic benefits for residents, workers and visitors to Bromley. For example, by identifying areas for improvement such as river restoration or linking green corridors across the borough will deliver multiple benefits. Bromley has a high number of rivers with some running underground through culverts. This may require additional investment to ensure the culverts remain effective and we are keen to work with you to develop a longer-term plan for managing and improving the river network across Bromley. Attached is a map showing the high number of main rivers and flood zones across Bromley.</p> <p>We are pleased to see that comments from our 2016, 2018 and 2020 consultations have been used to inform to the Infrastructure Delivery Plan. We note that the flood risk management schemes updates we provided have been used to update Table 14.1 (updated details on scheme status also provided).</p> <p>Existing corridors of land along the river frontage should be safeguarded and opportunities taken to set back development to enable sustainable and cost effective flood risk management, including upgrading of river assets. Flood awareness and robust emergency planning and response will additionally be critical to sustainable ongoing flood risk management. It is our intention to use proposals for Community Infrastructure Levy charging schedules to secure funding for flood risk management schemes that are unlikely to be wholly funded through Central or Local government funds. CIL will help complement other funding sources and fill gaps that remain as more funding for flood risk infrastructure will be expected to be provided locally as the traditional form of Grant in Aid is being reduced. This could be infrastructure schemes to mitigate the impacts of surface water runoff, reduce flood risk, river restoration projects, or projects to deliver river basin management plan objectives, where they can be clearly linked to open space or flood defence benefits or other flood risk management infrastructure.</p> <p>We are pleased to note that the Draft Charging Schedule recognises the need to keep the Infrastructure Delivery Plan (IDP) as a 'living' document which will be updated as and when new infrastructure demands arise or projects are identified.</p> <p>As part of the Water Framework Directive (WFD) all waterbodies are assessed for environmental quality. Currently the water environment and rivers across Bromley are generally assessed as requiring improvement. We recommend the CiL levy focuses on how the river corridors and water quality across Bromley can be improved.</p> <p>The existing two main council waste management sites at Waldo Road and Churchfields require upgrading work due to ongoing drainage issues and some odour complaints from the local community. We are aware some work is proposed during 2021 but longer term we recommend consideration of full demolition and rebuild or consider the potential for a new integrated and modern waste management facility for the LB of Bromley which could perhaps be funded through the Community Infrastructure Levy process. A new modern integrated waste management facility in a single location would also remove the existing Waldo Road waste site from a high risk flood zone and away from a culverted river as flooding events are expected to increase in frequency we recommend considering alternative lower flood risk sites for a new waste management site. Modern waste management facilities would prevent disruption and amenity issues during a flood event or extreme heatwaves</p> <p>We recommend the Infrastructure Delivery Plan is updated to include the need for modern waste management facilities and how the ongoing development proposed could be used to fund new facilities. A new modern integrated waste site in Bromley would ensure compliance with the latest good practice and environmental Permitting guidance, fire prevention guidance and health and safety guidance. The objective is for all waste management activities to be conducted in modern and fully enclosed buildings to prevent odour and amenity issues and manage fire risk from waste sites. The London Plan policies and permitting good practice encourage full enclosure..</p>	<p>The Council notes support for the IDP and will continue to engage with the EA in future revisions and look to identify infrastructure priorities.</p>

ID	Organisation	Summary of Representations	Council Response
DCS-008	Countryside Properties	<p>Context for representations is provided, including reference to the Preliminary Draft Charging Schedule and earlier iteration of the CIL viability assessment. Mayoral CIL and relevant adopted and emerging policy is also noted, including the adopted and emerging London Plans; and the Bromley Local Plan.</p> <p>On 8th February 2017, the London Borough of Bromley (LBB) selected Countryside Properties as its preferred development partner to bring forward the first phase of Site 10, Churchill Quarter. This is located in the northern part of the allocation within Bromley Town Centre.</p> <p>Bromley Town Centre is an Opportunity Area as outlined within the London Plan. Opportunity Areas, as defined within the London Plan, have the capacity to deliver 575,000 additional jobs and 303,000 addition new homes. This will be achieved through accommodating developments of higher densities in areas with good existing or potential public transport accessibility. Bromley Opportunity Area, as set out within the London Plan, has the capacity to deliver 2,000 new jobs and a minimum of 2,500 new homes. Furthermore, the Opportunity Area should promote Bromley Town Centre's role as a Metropolitan Town Centre through the delivery of new residential development and distinctive cultural, leisure and quality shopping experiences. Bromley Opportunity Area should also promote the enhancement of Bromley's business environment through the delivery of modern viable office provision.</p> <p>The Bromley Local Plan specifically outlines the following in relation to Site Allocation 10</p> <p>Redevelopment for mixed use including 1230 residential units, offices, retail and transport interchange.. Proposals will be expected to:</p> <ul style="list-style-type: none"> <li>- Incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location</li> <li>- Improve Bromley South Station Provide a high quality public realm and accessibility to and through the site.</li> <li>- Provide an attractive and active frontage to the High Street.</li> <li>- Be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.</li> </ul> <p>The Churchill Quarter Site is located within Bromley Town Centre which is designated as both a Metropolitan Centre and an Opportunity Area within the London Plan as detailed above. The Site further lies within Site Allocation 10. The Site as existing comprises of twenty residential maisonette properties at Ethelbert Close, Bromley Town Church and Nos. 102 108 High Street.. On the 11th May 2018 Countryside Properties (UK) Limited submitted a planning application for the redevelopment of the Churchill Quarter site (ref: 18/02181/FULL1). The application proposals seek full planning permission for the following:</p> <ul style="list-style-type: none"> <li>- Seven blocks, ranging between heights of 1 and 15 storeys (17 levels on the western boundary);</li> <li>- 410 new residential units comprising of 116 x 1 bed units, 207 x 2 bed units and 37 x 3 bed units;</li> <li>- 1315 sqm of new flexible community space (Use Class D1);</li> <li>- 1193 sqm of commercial floor space (Use Class A1 / A3/ D1/ D2);</li> <li>- 615 sqm of office / maker spaces (Use Class B1);</li> <li>- 103 Car parking spaces;</li> <li>- 807 cycle parking spaces; and</li> <li>- Public realm improves including the redesign of Library Garden, upgrading of Churchill Way, areas allocated for public art in Library Gardens and the Site, and informal and formal play spaces.</li> </ul> <p>There are currently ongoing negotiations with the Council in respect to the application proposals and various scheme amendments are under consideration. These are looking to positively respond to the feedback received through the statutory consultation process, whilst ensuring a deliverable scheme that meets the Councils strategic objectives as land owners and Partners.</p> <p>The following sections respond to the draft Charging Schedule and demonstrates how LBB's blanket approach to adopting a single CIL charge rate for residential development would be contrary to the aspirations of the Local Plan and would intrinsically discourage the delivery of much needed housing in the most sustainable location within the Borough.</p> <p>1) Whilst it is acknowledged that applying a flat rate is the simplest approach for LBB when considering CIL, this does not reflect or support the Council's and GLA's aims to deliver new development within the most sustainable locations including Opportunity Areas and Town Centres such as Bromley Town Centre. Within the emerging London Plan, draft Policy GG2 (Making the best use of land) states that to create successful sustainable mixed-use places, which make the best use of land, those involved in planning and development must enable the development of brownfield land, particularly in Opportunity Areas, surplus public land and sites within and on the edge of town centres. The policy further states that Sites should be prioritised for development which are well-connected by existing or planned public transport and</p>	<p>Context and site information noted.</p> <p>1) The Council have fully considered the potential introduction of a variable residential CIL rate through the CIL viability assessment. Paragraphs 30-32 summarise the report findings and it is specifically noted that: <i>it cannot be certain that compared with a rate set at a level of c. £100/sq. m borough-wide, an apparently more targeted approach would actually be significantly more responsive or beneficial. While that might be more relevant were a suitable general rate being put forward at a much higher level, compared with the suggested flat-rate approach any differential would be relatively small in both in monetary terms and in the context of CIL as a modest</i></p>

ID	Organisation	Summary of Representations	Council Response
		<p>developments should proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development particularly in locations which are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. This approach of delivering development in sustainable places is further echoed within LBB's Local Plan. Paragraph 1.4.15 of the Local Plan states that new housing to meet and exceed where possible, the minimum 641 London Plan target should be provided in sustainable locations, close to existing facilities and re-use brownfield sites. We already know that this requirement will be increasing within the new London Plan, and thereafter further through the new central Government Standard Methodology which we consider further below. Furthermore, emerging Policy SD1 (Opportunity Areas) of the Intend to Publish Version of the London Plan states that the ensure Opportunity Areas fulfil their potential Boroughs should support development which creates employment opportunities and housing choices for Londoners. At a local level, Policy 90 (Bromley Town Centre Opportunity Area) of the LB Local Plan identifies that Bromley Town Centre will deliver a minimum of 2,500 new homes and an indicative 2,000 jobs. Policy 92 (Metropolitan &amp; Major Town Centres) further outlines that the Council will require development within Bromley Town Centre to contribute positively to the town's status as an Opportunity Area and to its role as a Metropolitan Centre.</p> <p>2) The above clearly demonstrates that both the emerging London Plan and LBB Local Plan place emphasis on the need to deliver development within sustainable locations such as Opportunity Areas. LBB's current proposed approach for a flat chargeable rate for development would be in direct contradiction with this and would not provide any incentive to landowners and developers to deliver the strategic and local policy aspirations for development in sustainable locations.. At present, the draft schedule sets a flat rate for the whole borough and does not adopt an approach which differentiates the varying context of locations within the Borough. On the one hand, the borough comprises of a significant quantum of Green Belt and greenfield land but also has urban locations which are designated as opportunity and renewal areas. These varying spectrums pose different issues with significantly more costs associated with delivering developments on previously developed land in town centre locations such as Churchill Quarter. A blanket rate for the borough, would significantly impact the delivery of a number of urban schemes. As a predominately Green Belt borough, the opportunities to help deliver development in sustainable locations on previously developed land is imperative to help alleviate pressures on Green Belt land. The adoption of 'zones' which better reflect the nature of the location such as Bromley's town centres, opportunity areas and renewal areas would be much more appropriate to acknowledge the different contexts. This approach would allow for varying rates, with a zero rate or reduced rate in areas where development is prioritised by planning policy at levels but also where there are significantly greater development costs associated with such schemes. This would help incentivise developers to bring forward schemes in these locations. The accompanying Viability Report, prepared by Dixon Searle (July 2020) recognises that there is an alternative approach that could be adopted where a variable rate is adopted to key areas including Town Centres. An approach of this nature was raised during the consultation exercise on the preliminary drafting schedule within a number of the responses received, however, the Council within their response to these consultation responses identify that the Council consider that a flat rate is a 'more practical approach and has been deemed affordable'. Whilst it is acknowledged that the proposed approach would be simpler, the Borough has a duty to ensure sustainable development is brought forward. As outlined above, in a borough which comprises a significant proportion of Green Belt land, it is imperative that the Council use all reasonable endeavours to ensure in the first instance housing and employment targets can be delivered within the locations identified and prioritised in the Local Plan. Applying a variable rate to CIL, where the rate charged for development is reduced in these areas, would assist LBB in achieving its policy aims and targets.</p> <p>3) Furthermore, the proposed blanket approach to the application of CIL throughout the Borough would intrinsically discourage the delivery of much needed housing within LBB. As set out within the current London Plan, Table 3.1 identifies an annual housing target for the LB Bromley of 641 units. This equates to a minimum ten year target of housing to be delivered between 2015 and 2025 of 6,413 units. This is the basis on which the adopted Local Plan was prepared (Policy 1 – Housing Supply). Whilst the adoption of the Local Plan is relatively recent and we understand LBB are not in the process of producing a new Local Plan, the London Mayor is shortly to adopt its new London Plan. Within the Intend to Publish London Plan, draft Table 4.1 identifies a housing target of 774 units per annum (ten year housing target of 7,740) for LBB. This represents an increase from the adopted London Plan and Local Plan (641 units), reflecting the Mayor's drive to increase housing delivery within the capital through the optimisation for housing delivery on all suitable and available sites. Against this increased target LBB's latest Annual Monitoring Report (November 2020) shows that the Council can only demonstrate 3.31 years of supply of housing. This automatically triggers para 11 of the National Planning Policy Framework and the presumption in favour of sustainable development. This can only lead to an increase in speculative residential development proposals in unplanned locations. A variable CIL rate would help discourage this and at worst at least ensure appropriate CIL levels are captured from such sites.</p>	<p><i>proportion of development value of cost.</i></p> <p>It is noted that neither the Regulations nor the PPG (Paragraph: 022 Reference ID: 25-022-20190901) have an explicit requirement to introduce differential charging rates – it is at the discretion of the charging authority, reflecting local context. The PPG is clear that differential rates should not be used as a means to deliver policy objectives; the respondent's justification for differential rates refers to the need to ensure delivery of various policies, hence this seems to be at odds with the PPG.</p> <p>In setting the proposed rates, the Council consider that an appropriate balance has been struck between securing necessary infrastructure funding and ensuring that the potential effects on economic viability are mitigated. This is consistent with the key test for CIL Charging Schedules set out in the regulations.</p> <p>2) The CIL Viability assessment used a number of development typologies that reflect the type of development that we expect to come forward in Bromley. The viability assessment shows that a £100 per sqm flat rate is appropriate. The respondent has only made very broad assertions about variable rate and offers no specific evidence that sites in Bromley would necessitate a variable rate to ensure deliverability.</p> <p>Re: the impact on local and regional policy, there is also no evidence that specific policy aims will be affected. Re: the London Plan, the GLA responded to the PDCS consultation, supporting the principle of Bromley seeking to secure appropriate developer contributions in order to support the funding and delivery of improved infrastructure. The GLA did not raise any objections at DCS consultation stage in relation to impacts on the delivery of strategic policy.</p> <p>The Council notes that large-scale residential development of the type referred to by the respondent are the types of development most likely to necessitate infrastructure improvements, to mitigate impacts from large amounts of new residents in a specific area. This is the fundamental principle of CIL. The issue at hand is whether such typologies can viably accommodate a CIL charge, which the Council considers is the case with the proposed DCS rate, based on evidence. The respondent's issue seems to be more one of principle of whether large-scale development should have to pay CIL, which is at odds with CIL guidance and legislation</p> <p>The respondent seems to have an expectation of a much higher and more onerous bar of evidence than that sought by legislation, policy and guidance. The key test in the CIL regs is to strike an appropriate balance between infrastructure needs and the impact on economic viability; the Council considers that the proposed CIL rates strike the appropriate balance.</p> <p>3) As noted above, the CIL viability assessment demonstrates that the proposed residential rate is viable. The viability</p>

ID	Organisation	Summary of Representations	Council Response
		<p>4) In addition to the above, it should also be noted that the Government published on 16th December details of a new standard methodology to calculate housing need. This increases LBB's annual need to 1,211 units per annum thus exacerbating this situation even further. It is clear therefore that LBB need to significantly deliver additional housing to meet not only their current adopted target but any increase in this which may be applied upon both the adoption of the new London Plan and the revisions to the Standard Housing Methodology. The adoption of the Borough's blanket CIL charging rate for development, will significantly impact the viability of projects in many sustainable and prioritised locations, which could result in a number of developments unable to be brought forward. This would undermine the ability of the Council to address its growing housing shortfall. Whilst it is acknowledged that CIL plays an important role to generate funding for infrastructure to support new development, this should not be at the expense of bringing forward sustainable and Plan led development within the Borough. Paragraph 10 of the NPPG states that 'when deciding the levy rates, an authority must strike an appropriate balance between additional investment to support development and the potential effect on the viability of development'. It is considered that LBB's draft charging schedule does not achieve an 'appropriate balance' as it has the potential to discourage developers to bring forward much needed housing. The Viability Report that supports the draft Charging Schedule clearly recognises that an alternative approach could be appropriate. We therefore encourage LBB to review the rate for residential development and look to apply a reduction in identified urban areas where there are higher cost implications for developers to bring forward sites. This would ensure that much needed housing is delivered alongside other policy aspirations for these locations. Indeed through proper viability testing of the CIL rates it is possible that in strategically important locations for redevelopment a zero CIL rate is appropriate for some uses including housing.</p> <p>5) In summary, whilst we acknowledge the need for LBB to adopt a CIL Charging schedule to ensure sufficient funding is raised through developments to deliver additional infrastructure within the Borough, the current draft Schedule presents significant implications for both the delivery of developments within urban locations but also the much needed housing development within the Borough. There is both a clear drive at national, regional and local level to ensure development is delivered in sustainable locations on previously developed land including Opportunity Areas, Town Centres and Site allocations and the current approach to CIL provides no incentive for developers and landowners to do this. Given the importance of the CIL Charging Schedule for developers in the Borough, we look forward to further engagement with the Council as this is progressed to adoption.</p>	<p>assessment reflects costs associated with developing different types of site, based on different BCIS build costs and with increased allowances for certain other inputs for the larger flatted typologies.</p> <p>More generally, the viability assessment uses a buffer factor (explained in para 1.3.9 of the CIL viability assessment) which means that the recommended rates are at approximately half the level of the potential maximum viable rates. The viability assessment makes no allowance for discounting of existing floorspace, which would reduce the amount of CIL liable development (significantly in cases where there is a large amount of existing floorspace, as is the case with the examples cited by the respondent). The Bromley Development Control Committee report of 24 September, paragraph 3.10, provides more detail (see document reference: SD-001)</p> <p>The respondent's comments on how the presumption in favour of sustainable development will manifest on individual future planning decisions is completely speculative. The presumption does not displace the Development Plan as the starting point for decision-taking. It does not necessarily follow that the presumption will lead to more development in unplanned locations, or that a variable CIL rate could discourage such unplanned development.</p> <p>It is noted that planning policy has in built flexibility to allow for site-specific evidence to be put forward, e.g. in relation to affordable housing. This was noted in the viability assessment, para 3.2.2.</p> <p>As noted in the points above, the respondent has put forward no evidence to demonstrate that housing delivery would be discouraged; the points raised are entirely speculative. The Council considers that the proposed rates are suitable and are supported by detailed viability evidence – the respondent has not sought to challenge any of the detail of the viability assessment, e.g. the inputs, the context, etc; nor have they provided any viability evidence of their own. The points raised have all been considered in detail by the Council during the formulation of the proposed CIL charging schedule.</p> <p>4) See comments above re: the respondent's assertions on impact on housing delivery and delivery of policy aims; and the general lack of any detailed evidence to support the respondent's broad assertions on viability impacts</p> <p>Re: the standard method, this is not relevant for CIL or indeed any other planning policy consideration at the current time. The standard method is largely a plan-making consideration, and even then, there has to-date been a different, bespoke approach to assessing housing need in London. The standard method can apply to the five-year housing supply or the housing delivery test, but only where the adopted Development Plan is more than five years old; Bromley's Local Plan was adopted in 2019, hence it is not applicable.</p>

ID	Organisation	Summary of Representations	Council Response
DCS-009	Countryside Properties and The Riverside Group	<p>Context for representations is provided, including reference to the Preliminary Draft Charging Schedule and earlier iteration of the CIL viability assessment. Mayoral CIL and relevant adopted and emerging policy is also noted, including the adopted and emerging London Plans; and the Bromley Local Plan.</p> <p>Pike Close Estate is located to the west of Burnt Ash Lane and extends approximately 0.9ha. The Estate currently comprises of 92 residential units. The Estate is located within the Ravensbourne, Plaistow &amp; Sundridge Renewal Area, which has been identified by the LBB as an area where proposals should provide demonstrable economic, social, and environmental benefits. Pre-application engagement with local residents, the GLA and LBB has been undertaken in relation to the Site's redevelopment since 2016. In 2018, Countryside were selected as joint development partner alongside the Riverside Group, a registered affordable housing provider, to bring forward the redevelopment of the Pike Close Estate. Since the appointment of Countryside the scheme has continued to evolve and engagement has been continued to be undertaken with key stakeholders. Between the 22 March and the 15 April 2019 a ballot, in accordance with the Mayor of London's ballot requirements for new regeneration projects, was held. An offer document was produced by Riverside which was voted on by local residents and of the 86 eligible votes, 77 of these were returned. 82% of the returned votes were in support of the regeneration of Pike Close and as such, the ballot was approved. As a result of a clear majority voting in favour for the regeneration of Pike Close, the team are now in the process of working towards an application for the Site's regeneration. The proposed scheme will seek to reprovide the existing residential accommodation on the Site for residential alongside an uplift in residential units.</p>	Context and site information noted.
		<p><b>The observations in this section of the representations follow those set out in Submission DCS-008 - but reflect Pike Close in the context as a Renewal Area, The following variations and additions are:</b></p> <p><u>In point 1</u></p> <p>Replaces <i>"within the most sustainable locations including Opportunity Areas and Town Centres such as Bromley Town Centre"</i> with <i>"within the most sustainable locations including Renewal Areas such Ravensbourne, Plaistow &amp; Sundridge Renewal Area, which as set out above, Pike Close is situated within"</i></p> <p>Replaces <i>"Furthermore, emerging Policy SD1 (Opportunity Areas) of the Intend to Publish Version of the London Plan states that the ensure Opportunity Areas fulfil their potential Boroughs should support development which creates employment opportunities and housing choices for Londoners. At a local level, Policy 90 (Bromley Town Centre Opportunity Area) of the LB Local Plan identifies that Bromley Town Centre will deliver a minimum of 2,500 new homes and an indicative 2,000 jobs. Policy 92 (Metropolitan &amp; Major Town Centres) further outlines that the Council will require development within Bromley Town Centre to contribute positively to the town's status as an Opportunity Area and to its role as a Metropolitan Centre."</i> with <i>"Furthermore, Policy 13 (Renewal Areas) of the LB Local Plan states that the Council will seek to maximise opportunities for the enhancement and improvement within Renewal Areas. Renewal Areas will be required to maximise opportunities to deliver high quality environments, support health and wellbeing, create inclusive communities, encourage an appropriate mix of housing tenures, make a positive contribution to the vitality of local centres and improve accessibility."</i></p> <p><u>in point 2</u></p> <p>Varies sentence beginning "The above clearly demonstrates....." from <i>"such as Opportunity Areas"</i>. with <i>"such as Renewal Areas"</i>. Varies sentence beginning "These varying spectrums pose " from <i>"in town centre locations such as Churchill Quarter"</i> with <i>"in town centre locations such as Pike Close"</i>. Varies sentence beginning "The accompanying Viability Report, prepared by Dixon Searle" from <i>"key areas including Town Centres"</i> with <i>"key areas including Renewal Areas"</i>.</p> <p><u>In point 4</u></p> <p>Additional paragraph <i>" This is especially important for Sites such as Pike Close, which are to be delivered in combination with a Registered Housing Provider. The Mayor's Estate Regeneration draft policy within the Intend to Public London Plan (draft Policy H8 Loss of existing housing and estate redevelopment) requires all development proposals that include the demolition and replacement of affordable housing to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Adopting a CIL charge to these types of housing schemes has the ability to significantly affect the viability of schemes and as such, hinder their ability to deliver any uplift affordable housing, which is a strategic priority for both the GLA and LBB."</i></p> <p><u>In point 5</u></p>	<p>The Council's response to submission DCS-008 also applies here, given that the responses are almost entirely the same.</p> <p>Re: the elements which differ, the reference to renewal areas does not provide any justification to amend the proposed CIL rates. The Council considers that the proposed rates to not threaten the delivery of the renewal area policies, and we note that no detailed evidence is put forward to support the respondent's assertion that the delivery of the renewal area policy objectives will be affected.</p> <p>Re: affordable housing, it is noted that any development of social housing would benefit from specific CIL relief, which would have a positive impact on scheme viability. As noted above, no detailed evidence is put forward to reinforce the broad points made; it is entirely supposition.</p>

ID	Organisation	Summary of Representations	Council Response
		At the end of "to ensure development is delivered in sustainable locations on previously developed land including Opportunity Areas, Town Centres and Site allocations" replaces " <i>Site allocations</i> " with " <i>Renewal Areas</i> "	
DCS-010	Areli Real Estate	<p>Context for representations is provided, including reference to the Preliminary Draft Charging Schedule and earlier iteration of the CIL viability assessment. Mayoral CIL and relevant adopted and emerging policy is also noted, including the adopted and emerging London Plans; and the Bromley Local Plan.</p> <p>Areli Real Estate have a land interest within Orpington Town Centre, specifically the Walnut Shopping Centre Site. Areli purchased the Walnuts Shopping Centre Site in September 2019 and will bring forward the Site for redevelopment. The Walnuts Shopping Centre is located within the Orpington Town Centre and comprises a mix of retail, leisure and commercial uses. Orpington town centre is a designated Major Town Centre towards which growth and regeneration should be strategically targeted towards in accordance with adopted Development Plan policy and National Planning Guidance. Critically policy at all levels requires redevelopment opportunities in such a location to be optimised in order to reduce pressure for development in less sustainable locations including the Green Belt, the protection of which continues to be strongly advocated.</p> <p>The Walnuts Shopping Centre represents an exciting regeneration opportunity within the town centre which has the potential to bring forward a wide range of appropriate town centre uses including a significant quantum of residential accommodation for the Borough. Areli Real Estate have begun consultation on the redevelopment of the Site with key stakeholders and the London Borough of Bromley. The proposal to date comprises of the redevelopment of the Walnuts Shopping Centre Site to provide a mixed use development comprising of residential, commercial and leisure uses. The redevelopment of the Site which includes both the Walnuts Shopping Centre and Walnuts Leisure Centre will provide approximately 1000 new homes, a state of the art new leisure facility, high quality floorspace for retail and other town centre uses and new high quality public realm including a new civic town square.</p> <p><b>The observations in this section of the representation follow those set out in Submission DCS-008 - but reflect Orpington Town Centre and the Walnut Shopping Centre, The following variations and additions are:</b></p> <p><u>In point 1</u></p> <p>Varies in the sentence beginning "Whilst it is acknowledged that applying a flat rate is the simplest approach..." from "<i>including Opportunity Areas and Town Centres such as Bromley Town Centre</i>" to "<i>including Major Town Centres like Orpington</i>".</p> <p>Varies references to London Plan Policy SD1 and substitutes with - "<i>Furthermore, Policy 13 (Renewal Areas) of the LB Local Plan states that the Council will seek to maximise opportunities for the enhancement and improvement within Renewal Areas. Renewal Areas will be required to maximise opportunities to deliver high quality environments, support health and wellbeing, create inclusive communities, encourage an appropriate mix of housing tenures, make a positive contribution to the vitality of local centres and improve accessibility.</i>"</p> <p><u>in point 2</u></p> <p>Varies sentence beginning "The above clearly demonstrates that..." from "<i>such as Opportunity Areas</i>" to "<i>such as Major Town Centres</i>". Varies sentence beginning "These varying spectrums pose " from "<i>in town centre locations such as Churchill Quarter</i>" with "<i>in town centre locations such as Walnuts Shopping Centre</i> "</p> <p><u>In point 4</u></p>	<p>Context and site information noted.</p> <p>The Council's response to submission DCS-008 also applies here, given that the responses are almost entirely the same.</p> <p>Re: the elements which differ, the reference to renewal areas does not provide any justification to amend the proposed CIL rates. The Council considers that the proposed rates to not threaten the delivery of the renewal area policies, and we note that no detailed evidence is put forward to support the respondent's assertion that the delivery of the renewal area policy objectives will be affected.</p> <p>Re: the reference to the impact of CIL on complex large-scale town centre regeneration projects, we note that no detailed evidence is put forward to support the respondent's assertion.</p>

ID	Organisation	Summary of Representations	Council Response
		<p>Additional Paragraph ""The Borough's blanket CIL charging rate for development further hinders the delivery of Town Centre regeneration schemes such as Orpington Town Centre. Within recent Government announcements, the regeneration of the high street and the strategic regeneration of declining town centres has been identified as a key focus for both central and local Government. Large scale town centre regeneration projects are hugely complex in nature often requiring land use assembly and lease term considerations. The delivery of residential uses alongside other town centre uses is an important part of scheme deliverability. As a result of this, the delivery of Town Centre regeneration schemes are often costly and complex and the delivery of residential uses as part of mixed use schemes is an important part of scheme deliverability. The adoption therefore of a blanket CIL rate for development does not take into account these complexities of these types of schemes or provide any incentive for high quality town centre regeneration scheme to come forward. Adoption of such an approach can only serve to frustrate the successful delivery of such important regeneration objectives and encourage residential development in non-town centre locations."</p>	
DCS-011	Network Rail	<p>We have reviewed the Infrastructure Delivery Plan and Schedule table 2020 and confirm that all railway/station enhancement projects within LB Bromley have been included and no further projects have been identified for inclusion at this stage.</p>	<p>Council note support. Infrastructure priorities will be identified and use of CIL will be reported annually in the IFS.</p>
DCS-012	Metropolitan Police	<p>Representations were previously made to the LB Bromley CIL preliminary draft charging schedule (PDCS) (March 2018) consultation, on behalf of the MPS, in a letter dated 9 March 2018.. We are pleased to see that the comments submitted to the Council have been incorporated as part of the Infrastructure Delivery Plan (IDP) Update Report 2020 (September 2020). The growth in homes, offices and other uses will significantly increase the need for policing and the cost for associated infrastructure. This therefore represents a legitimate infrastructure requirement that should be accounted for. We are pleased to see that the LB Bromley's Local Plan makes reference to 'policing' as infrastructure. The MPS have to move towards securing S106/CIL from development due to the impacts on crime. The MPS would like to have the ability to receive financial contributions during the LB Bromley's Local Plan period, and are in the process of working up a formula linking to development impacts which should be available soon.</p> <p>A breakdown of non-property related infrastructure sought by the MPS is provided and an extract of the Draft Wandsworth Planning Obligations SPD (2020) is provided at Appendix 1, which provides an example of what the MPS are seeking to be included within LB Bromley's Infrastructure Study. We highlight that a number of other London Boroughs are now using this text. In addition, we enclose an extract of the adopted Mid Sussex Development Infrastructure and Contributions SPD (July 2018) at Appendix 2, which shows how contributions are charged. There are quite a few Police and Crime Commissioners across the Country who are charging in this way.</p> <p>It is widely accepted and documented that policing infrastructure represents a legitimate item for inclusion within the CIL Charging Schedule. A number of policing authorities have sought legal advice on this issue and received confirmation of this. The advice also confirms that S106 and CIL infrastructure is not limited to buildings and could include equipment such as surveillance infrastructure and CCTV. Case law is provided in support of this view, with a number of appeals and court cases where the charges were found legitimate provided at Appendix 3.</p> <p>The MPS have an emerging infrastructure requirement for neighbourhood police facilities that can provide a base of operation for officers of the MPS and can be secured through S106 agreements. Further information on the neighbourhood police facility will be disclosed soon.</p> <p>The MPS have an urgent infrastructure requirement for a car pound facility within the London Borough of Bromley or any other London Borough. The requirement is for 6 - 12 acres (2.5 - 5 hectares) of open industrial land (leased from private landlords or purchased freehold).</p> <p>A car pound facility is where the MPS deal with vehicles that have been stolen, seized for motoring offences or for forensic examination. The MPS are finding that the owners of their existing car pound sites are seeking to pursue development opportunities and cease the current use when the lease permits. Both of the current car pound sites are subject to pressure for industrial and/or residential development and intensification of use.</p> <p>The MPS are concerned that if their existing car pounds have to be vacated, this may have significant difficulties in operating their vehicle recovery and car pound service. The difficulties that exist in finding land for car pounds also extend to other aspects of policing, including the following:</p> <ul style="list-style-type: none"> <li>• Driver training;</li> <li>• Firearms training; and</li> <li>• Dog Training.</li> </ul>	<p>Council note the support for IDP and will continue to engage with the Metropolitan Police on future iterations of the IDP and the development of planning policy.</p> <p>As highlighted in the IDP, some of the items may be better served by S106 rather than CIL. The Council will revise its Planning Obligations SPD after the adoption of CIL which may include a specific approach to securing the items highlighted.</p>

ID	Organisation	Summary of Representations	Council Response
		<p>We acknowledged that it may be difficult to deliver this car pound requirement within the London Borough of Bromley, but suggest that the Council work with the MPS to identify suitable plots for the delivery of a car pound facility within the borough, if possible. Further to the above, the MPS request that the LB Bromley's Infrastructure Delivery Plan (IDP) includes a section highlighting the importance of the MPS car pound requirement in the borough.</p> <p>As indicated above, it is widely accepted and documented that policing infrastructure represents a legitimate infrastructure requirement that should be accounted for. It is therefore important that policing is referred to as social infrastructure and as such, we are pleased to see that the LB Bromley's Infrastructure Delivery Plan (IDP) Update Report 2020 makes reference to emergency services. We do however, request that a section is also included in the LB Bromley's IDP confirming that policing infrastructure can be included within CIL/S106. The MPS also have an emerging infrastructure requirement for neighbourhood police facilities that can be secured through S106 Agreements. In addition to the above, the MPS have an infrastructure requirement for a car pound facility, which we acknowledge may be difficult to deliver within the Borough. We note that this requirement is not relevant to this consultation; however we are keen to engage with the Council to discuss how the MPS car pound requirement can be accounted for in the borough and the potential for a site allocation in the future, if possible.</p>	
DCS-013	Cray Forum	<p>Agreed with the residential and supermarket rates, no comment on other rates</p> <p>Asks whether levy can be used to support Heritage and open space and encourage residents to use and appreciate the benefit of these facilities.</p>	Council note support. Infrastructure priorities will be identified and use of CIL will be reported annually in the IFS.
DCS-014	Orpington and District Archaeological Society	<p>No comment on CIL rates.</p> <p>Support the collection of the levy and agree that it should not be collected when work on improving Schedule Monuments and Archaeological Sites takes place.</p> <p>Regarding the Infrastructure Delivery Plan (IDP). Glad to see that the levy can be spent on Open Spaces and Heritage Assets. The paper states as part of the local plan evidence base that provision to the east of the Borough is in greater need of improvement. The Orpington and District archaeological Society would welcome money to be spent on improving Scadbury Park and in particular the Moated Manor Site. Perhaps some of the levy could be spent on Scadbury as part of the work to be carried out under Regeneration and Open Space Strategies.</p>	Council note support. Infrastructure priorities will be identified and use of CIL will be reported annually in the IFS.
DCS-015	Anonymous via Survey Monkey	Expressed disagreement with shared living and retail warehousing rate - feels that Shared Living should not be charged at a higher rate, and that Retail Warehousing should be charged at a higher rate	The Council consider the rates to be appropriate and are supported by the Viability study. No reasons or evidence have been put forward to support the disagreement with these specific rates.
DCS-016	Friends of Scadbury	<p>Agreed with all rates. I agree to the levy if the funds are used to improve the borough for all its residents with particular emphasis on green spaces which have proved so essential in lockdown. The document notes the eastern side of the borough needs improving and Scadbury is mentioned. This has suffered from a lack of investment for many years.</p> <p>Any heritage sites, monuments and green spaces should be exempt from the levy</p>	Council note support. Infrastructure priorities will be identified and use of CIL will be reported annually in the IFS.
DCS-017	Anonymous via Survey Monkey	Disagreed with residential rate. The amount for residential developments is too low. It is the same figure that has been discussed at Bromley for the last 5 or so years.	The Council consider the rates to be appropriate and are supported by the Viability study. No evidence has been put forward to support the disagreement with these specific rates.
DCS-018	Resident via Survey Monkey	Disagreed with Residential rates. Rates being set to high. Feel they should be roughly halved .£8000 on an 80sqm residence is too much and will slow housing projects or increase price they are offered for post development sales. What evidence? This is a subjective stealth tax levy. It hinders enterprise. Ill timed In view of depression of economy and slowing of business generally across the country. Also poor proposal in view of the excessive time planning applications and appeals are taking.	<p>The Council consider the rates to be appropriate and are supported by the Viability study. No evidence has been put forward to support the disagreement with these specific rates.</p> <p>With regards to the current economic circumstances, we would highlight that the Government's response to the Covid-19 pandemic was to amend the CIL Regulations to include a deferral of payment, rather than introduce further relief from paying (or a subsequent reduction) on existing CIL charges.</p> <p>The Council does not consider that CIL will extend the time taken for planning applications to be determined. We would highlight that one of the Government's main drivers for the introduction of CIL is that it would be a quicker mechanism for securing most planning contributions.</p>

## Appendix A – Consultation notification on Preliminary Draft Charging Schedule

### Consultation letter

 THE LONDON BOROUGH	<b>Planning Strategy and Projects</b> Civic Centre, Stockwell Close, Bromley, BR1 3UH
	Telephone: 020 8464 3333      Fax: Direct Line: 020 8313 4344      Internet: <a href="http://www.bromley.gov.uk">www.bromley.gov.uk</a> Email: <a href="mailto:LCIL@bromley.gov.uk">LCIL@bromley.gov.uk</a>
	Your Reference:      Our Reference:

«Title» «Given\_Name» «Family\_Name»      22nd January 2018  
«Position»  
«Company\_\_Organisation»  
«Address\_Line\_1»  
«Address\_Line\_2»  
«Address\_Line\_3»  
«Post\_Town»  
«Post\_Code»

Dear «Title» «Family\_Name»,

**London Borough of Bromley Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule (PDCS) Consultation**

We are writing to you because you are registered on our planning consultation database. Your comments are invited on Community Infrastructure Levy Preliminary Draft Charging Schedule (PDCS). The PDCS has been published for its first round of consultation to help inform the preparation of the Draft Charging Schedule. This will then be followed by a further round of consultation expected later in 2018.

Bromley's Community Infrastructure Levy, once adopted, will largely replace planning obligations as the main way that Bromley will help fund local infrastructure through charges on new development. It will be collected alongside the Mayoral CIL. The consultation builds on ongoing engagement with the community, partner agencies and other local authorities in line with Bromley Council's adopted Statement of Community Involvement.

The document is available for inspection and comment via the link to the 'Planning Consultation Portal' on the 'Developing Bromley's Community Infrastructure Levy' page of the Council's website [www.bromley.gov.uk/pdcs](http://www.bromley.gov.uk/pdcs) until 9<sup>th</sup> March 2018.

In order for you to make comments on line, you will need to log into the portal if have forgotten your 'Username' or 'Password', please follow the instructions for 'Forgotten password?' or 'Forgotten username?' options on the 'Login/Register' option at the top of the Consultation Portal front page. If you have [problems](#) go to the Help icon and select registering online for assistance.

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

Please submit comments by 9<sup>th</sup> March 2018.

The comments received will be made public in a report when they are considered by the Council and will be used to develop the next stage of Bromley's Community Infrastructure Levy.

Yours «FAITH\_SINC»,

Jim Kehoe  
Chief Planner  
Planning Division  
Department of Environment and Community Services



## London Borough of Bromley News Release

1 February 2018  
For immediate release

### Community Infrastructure Levy (CIL) consultation underway

Consultation about the Council's proposed Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule (PDCS), is underway and responses are being invited by Friday 9<sup>th</sup> March 2018.

The 6 week consultation period gives an opportunity for comment about the CIL, which is a levy that allows local authorities to raise funds from new development towards the infrastructure needed because of that development. The CIL will provide infrastructure to support the development of an area and will be used for specific projects selected by the Council from the final Regulation 123 list of infrastructure projects. It will also work in tandem with a smaller number of S106 Legal Agreements which are used where necessary to make an individual planning application acceptable in planning terms.

"When development takes place, often, new or updated infrastructures, such as roads are needed. Residents in a new housing development will need access to medical or educational facilities for instance and the CIL is the mechanism to make sure that these costs are factored into the planning process providing developers with more certainty up front. They will know how much they will need to contribute before they submit a planning application and can factor this in when they are budgeting to decide if a development is viable. The CIL largely replaces the old s.106 agreement system. I would encourage interested parties to look at the proposals on our website and respond as they see fit" said Councillor Peter Morgan, Executive Councillor for Renewal and Recreation.

If and when, the Community Infrastructure Levy is adopted, it will be applied as a statutory charge. The CIL's Preliminary Draft Charging Schedule (PDCS) document represents the first stage of public consultation on the proposed charges, which would apply borough wide.

As well as inviting comments on the PDCS, views and responses are invited on the relevant evidence base documents, which include a Viability Assessment Report, the Infrastructure Delivery Plan (IDP), background evidence paper on Section 106 Monies Raised and Affordable Housing Provision, and an Indicative Regulation 123 list.

The consultation information and documents are available on the Council's website at : [www.bromley.gov.uk/consultation](http://www.bromley.gov.uk/consultation) or alternatively the PDCS is available at the Main Reception, Civic Centre and all Bromley Libraries.

#### ENDS

For media enquiries, please contact Andrew Rogers, Communications Executive, on 020 8461 7670 or email [andrew.rogers@bromley.gov.uk](mailto:andrew.rogers@bromley.gov.uk)

## Local newspaper notice

### PUBLIC NOTICE

#### COMMUNITY INFRASTRUCTURE LEVY (CIL) PRELIMINARY DRAFT CHARGING SCHEDULE (PDCS) CONSULTATION

**Town and Country Planning Act 2008 (Part 11) (as amended) Localism Act 2011 (part 6).  
The Community Infrastructure Levy, England and Wales Regulations 2010 (as amended)  
Regulation 15 Preliminary Draft Charging Schedule.**

The London Borough of Bromley has commenced consultation on its Community Infrastructure Levy Preliminary Draft Charging Schedule (PDCS), for a 6 week period, with consultation formally closing on Friday 9<sup>th</sup> March 2018. Comments are invited on the PDCS and relevant background documentation.

If and when, the Community Infrastructure Levy is adopted, it will be applied as a statutory charge on all new development. CIL will largely replace planning obligations as the main way that Bromley Council will help fund local infrastructure through charges on new development. The PDCS represents the first stage of public consultation on the proposed charges, which would apply borough wide.

The consultation information and background documents are available on the Council's website at : [www.bromley.gov.uk/pdcs](http://www.bromley.gov.uk/pdcs) or alternatively the PDCS is available at the Main Reception, Civic Centre, Stockwell Close, Bromley BR1 3UH between 9.00 -17.00 weekdays and all Bromley Libraries. Full details of library locations and opening times are available at : [http://www.bromley.gov.uk/directory/11/libraries\\_in\\_bromley](http://www.bromley.gov.uk/directory/11/libraries_in_bromley).

Representations can be made by email to [LCIL@bromley.gov.uk](mailto:LCIL@bromley.gov.uk), by post at the address above, or online via the Council's consultation portal at <http://bromley.objective.co.uk/portal>

Any organisation or individual who wishes to be informed of the consultation on the next stage of public consultation for CIL (Draft Charging Schedule stage) should make this request as part of their representation.

**All representations must be received by the Council by 5pm on Friday 9<sup>th</sup> March 2018.**

## Appendix B – Consultation notification on Draft Charging Schedule

### General consultation letter



**Bromley**  
THE LONDON BOROUGH

Planning Policy and Strategy,  
Civic Centre, Stockwell Close, Bromley,  
BR1 3UH

Email: [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk)

4 November 2020

Dear Sir or Madam,

**London Borough of Bromley Community Infrastructure Levy Draft Charging Schedule Consultation**

The Community Infrastructure Levy (CIL) allows local authorities in England and Wales (known as charging authorities for the purposes of CIL) to raise funds from developers undertaking new building projects. The primary use of CIL is to gain financial contributions from certain types of development to help fund new or improved strategic infrastructure required to support the growth identified in the Bromley Local Plan.

The London Borough of Bromley intends to submit a CIL Draft Charging Schedule for independent examination, in accordance with Section 212 of Planning Act 2008 (as amended). The Bromley CIL Draft Charging Schedule, the relevant evidence which supports it, and this statement of representations procedure are available to view on the Council's website at:  
[https://www.bromley.gov.uk/info/1004/planning\\_policy/1179/bromleys\\_community\\_infrastructure\\_levy](https://www.bromley.gov.uk/info/1004/planning_policy/1179/bromleys_community_infrastructure_levy)

The COVID-19 pandemic affects our ability to display documents for inspection at the Council's principal office at the Civic Centre, Stockwell Close, Bromley, BR1 3UH; however, we can arrange for documents to be made available for inspection by appointment. Please contact the CIL team at [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk) to arrange this.

Consultation will run from 6 November 2020 until 20 December 2020. Any representations must be made within this period. Representations on the Bromley CIL Draft Charging Schedule can be made in writing to: Bromley CIL Draft Charging Schedule, Planning Policy and Strategy, Civic Centre, Stockwell Close, Bromley, BR1 3UH; via email to: [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk); or through an online questionnaire at: <https://www.surveymonkey.co.uk/r/9BYJ96V>.

You have been contacted as you responded to a previous consultation on the CIL Preliminary Draft Charging Schedule. Please contact the CIL team via the details above if you require any further information on the consultation.

Yours sincerely



Ben Johnson  
Head of Planning Policy and Strategy, London Borough of Bromley

## Consultation Bodies letter



Planning Policy and Strategy,  
Civic Centre, Stockwell Close, Bromley,  
BR1 3UH

Email: [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk)

4 November 2020

Dear Sir or Madam,

### London Borough of Bromley Community Infrastructure Levy Draft Charging Schedule Consultation

The Community Infrastructure Levy (CIL) allows local authorities in England and Wales (known as charging authorities for the purposes of CIL) to raise funds from developers undertaking new building projects. The primary use of CIL is to gain financial contributions from certain types of development to help fund new or improved strategic infrastructure required to support the growth identified in the Bromley Local Plan.

The London Borough of Bromley intends to submit a CIL Draft Charging Schedule for independent examination, in accordance with Section 212 of Planning Act 2008 (as amended). The Bromley CIL Draft Charging Schedule, the relevant evidence which supports it, and this statement of representations procedure are available to view on the Council's website at:

[https://www.bromley.gov.uk/info/1004/planning\\_policy/1179/bromleys\\_community\\_infrastructure\\_levy](https://www.bromley.gov.uk/info/1004/planning_policy/1179/bromleys_community_infrastructure_levy)

The COVID-19 pandemic affects our ability to display documents for inspection at the Council's principal office at the Civic Centre, Stockwell Close, Bromley, BR1 3UH; however, we can arrange for documents to be made available for inspection by appointment. Please contact the CIL team at [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk) to arrange this.

Consultation will run from 6 November 2020 until 20 December 2020. Any representations must be made within this period. Representations on the Bromley CIL Draft Charging Schedule can be made in writing to: Bromley CIL Draft Charging Schedule, Planning Policy and Strategy, Civic Centre, Stockwell Close, Bromley, BR1 3UH; via email to: [lcil@bromley.gov.uk](mailto:lcil@bromley.gov.uk); or through an online questionnaire at: <https://www.surveymonkey.co.uk/r/9BYJ96V>

You have been contacted as you are an identified consultation body as set out in the CIL regulations. A copy of the Draft Charging Schedule and Statement of Representations Procedure is enclosed. Please contact the CIL team via the details above if you require any further information on the consultation.

Yours sincerely

Ben Johnson  
Head of Planning Policy and Strategy, London Borough of Bromley

## Local newspaper notice

**PUBLIC NOTICE**

**LONDON BOROUGH OF BROMLEY**

**COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE**

The London Borough of Bromley intends to submit a Community Infrastructure Levy (CIL) Draft Charging Schedule for independent examination, in accordance with Section 212 of Planning Act 2008 (as amended).

The Bromley CIL Draft Charging Schedule, the relevant evidence which supports it, and this statement of representations procedure are available to view on the Council's website at: [https://www.bromley.gov.uk/info/1004/planning\\_policy/1179/bromleys\\_community\\_infrastructure\\_levy](https://www.bromley.gov.uk/info/1004/planning_policy/1179/bromleys_community_infrastructure_levy)

The COVID-19 pandemic affects our ability to display documents for inspection at the Council's principal office at the Civic Centre, Stockwell Close, Bromley, BR1 3UH; however, we can arrange for documents to be made available for inspection by appointment. Please contact the CIL team at [licil@bromley.gov.uk](mailto:licil@bromley.gov.uk) to arrange this.

Consultation will run from 6 November 2020 until 20 December 2020. Any representations must be made within this period.

Representations on the Bromley CIL Draft Charging Schedule can be made in writing to: Bromley CIL Draft Charging Schedule, Planning Policy and Strategy, Civic Centre, Stockwell Close, Bromley, BR1 3UH; via email to: [licil@bromley.gov.uk](mailto:licil@bromley.gov.uk); or through an online questionnaire at: <https://www.surveymonkey.co.uk/r/9BYJ96V>

Organisations and individuals making representations may request the right to be heard by the examiner at the CIL examination; this request should be expressly stated in your representation. Please note that the CIL examiner is responsible for determining who can participate in the examination, including the ability to speak at any future examination hearing.

Representations may be accompanied by a request to be notified at a specified address of any of the following—

- (i) that the draft charging schedule has been submitted to the examiner in accordance with section 212 of PA 2008,
- (ii) the publication of the recommendations of the examiner and the reasons for those recommendations, and
- (iii) the approval of the charging schedule by the charging authority.



THE LONDON BOROUGH  
[www.bromley.gov.uk](http://www.bromley.gov.uk)