

ORPINGTON AND DISTRICT ARCHAEOLOGICAL SOCIETY

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14 November 2017

Dear Mr Banks

LONDON BOROUGH OF BROMLEY LOCAL PLAN EXAMINATION

I refer to your e-mail of 16 October.

Please find attached this society's submission for the London Borough of Bromley Local Plan Examination.

Yours sincerely

Michael Meekums

LONDON BOROUGH OF BROMLEY LOCAL PLAN EXAMINATION
SUBMISSION OF COMMENTS BY THE
ORPINGTON AND DISTRICT ARCHAEOLOGICAL SOCIETY

Set out below are ODAS 's comments regarding what we consider to be errors on four of the maps included in the draft LBB local plan:

Scadbury Local Nature Reserve – Map Set Part 1 Nos 5 & 9

The Orpington and District Archaeological Society (ODAS) is currently carrying out an excavation at Scadbury Moated Manor. As far as we can see on the current Unitary Development Plan the moated site is shown as being within the Scadbury Park Local Nature Reserve, and has green triangles around it to show that it is also within an Area of Archaeological Significance.

In 2013 Historic England Scheduled the moated site as an Ancient Monument, and it has since been placed on the 'At Risk' Register.

Bromley Council consulted local interested bodies (ODAS being one of those consulted) on the draft local plan. No maps were included when it was initially put onto the council website; they were only placed on the website at a later date. ODAS commented that we were content with the wording regarding the built heritage. It was only much later that we realised that we had not seen the maps. We nevertheless commented on two of them after the deadline had past in January 2017. We had noticed on the draft map set part 1 Nos 5 & 9 that the area around the moated site had been shown with a black dotted line around it, indicating that the area was not part of the Local Nature Reserve.

On looking at the Defra designation for the local nature reserve

http://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&activelayer=InrIndex&query=REF_CODE%3D%271009122%27 it would appear that the moated site is indeed part of the Local Nature Reserve. In the draft local plan there is a new separate map showing the Areas of Archaeological Significance for the whole borough and this includes – correctly – the area around the Scadbury moated site. We think what has happened is that since the Area of Archaeological Significance around the moated site is now shown on the new map of Areas of Archaeological Significance, Maps 5 & 9 have been wrongly amended. The green triangles on the current UDP have been replaced with new black dotted lines; these indicate the limits of the nature reserve, so exclude the moated site. This may be because it has not been appreciated that an area can be both an Area of Archaeological Significance and remain part of the Nature Reserve. ODAS considers that the black dotted lines around the moated site should be removed so that Map Nos 5 & 9 show clearly that the moated site remains part of the Local Nature Reserve, in line with the Defra designation.

Spatial Strategy Map

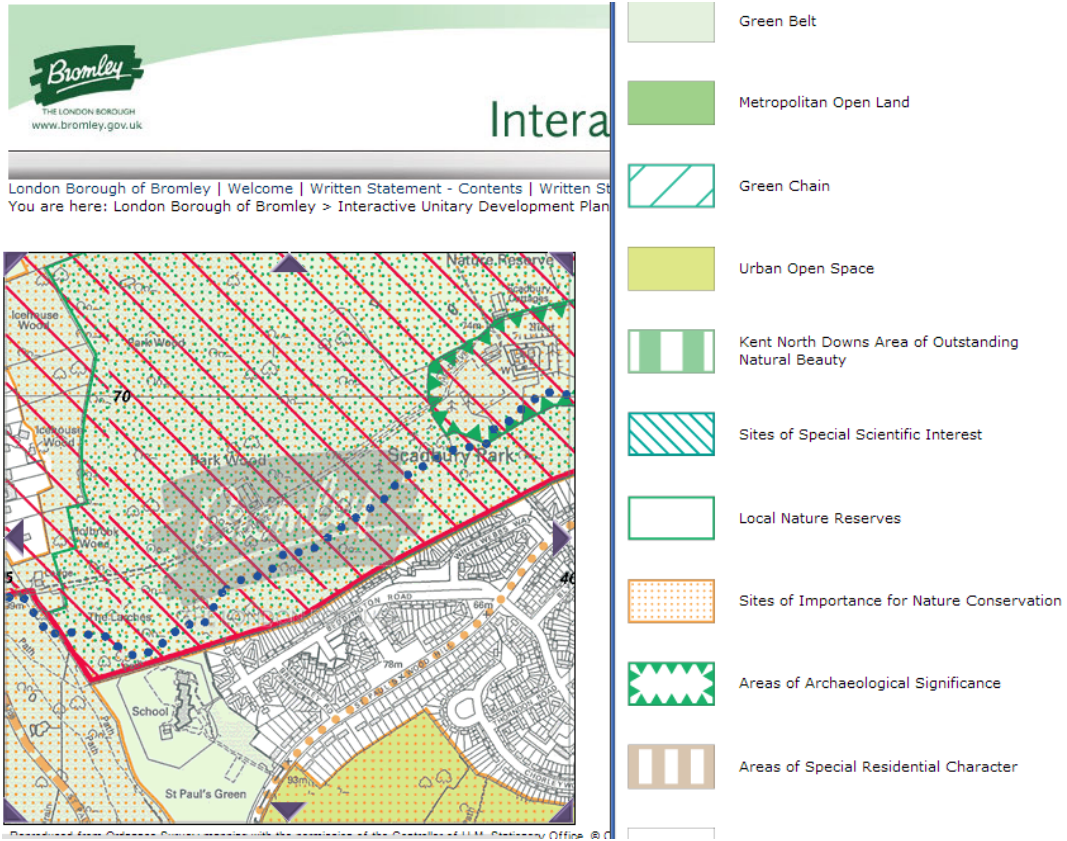
We have also noticed that the Spatial Strategy map showing the renewal area for the Cray Business Corridor has the northern boundary going through the Scadbury Local Nature Reserve rather than along the boundary between the reserve and the houses on the estate. ODAS would like to see northern boundary redrawn.

Fordcroft Romano-British Bath House and Anglo-Saxon Cemetery Scheduled Monument

Historic England have suggested a series of new maps showing the boundaries around the scheduled monuments in the borough. ODAS welcomes this suggestion. However the map showing the boundary around the Fordcroft Romano-British Bath House and Anglo-Saxon cemetery has been drawn in the wrong place. The line appears to exclude the bath house itself. ODAS feels that the boundary needs to be redrawn so that it matches the one on the Historic England website showing the designated area of the Scheduled monument see <https://historicengland.org.uk/listing/the-list/list-entry/1001973> .

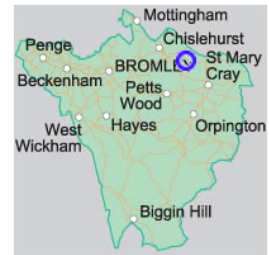
Below are copies of all the relevant maps for ease of reference.

Current Unitary Plan

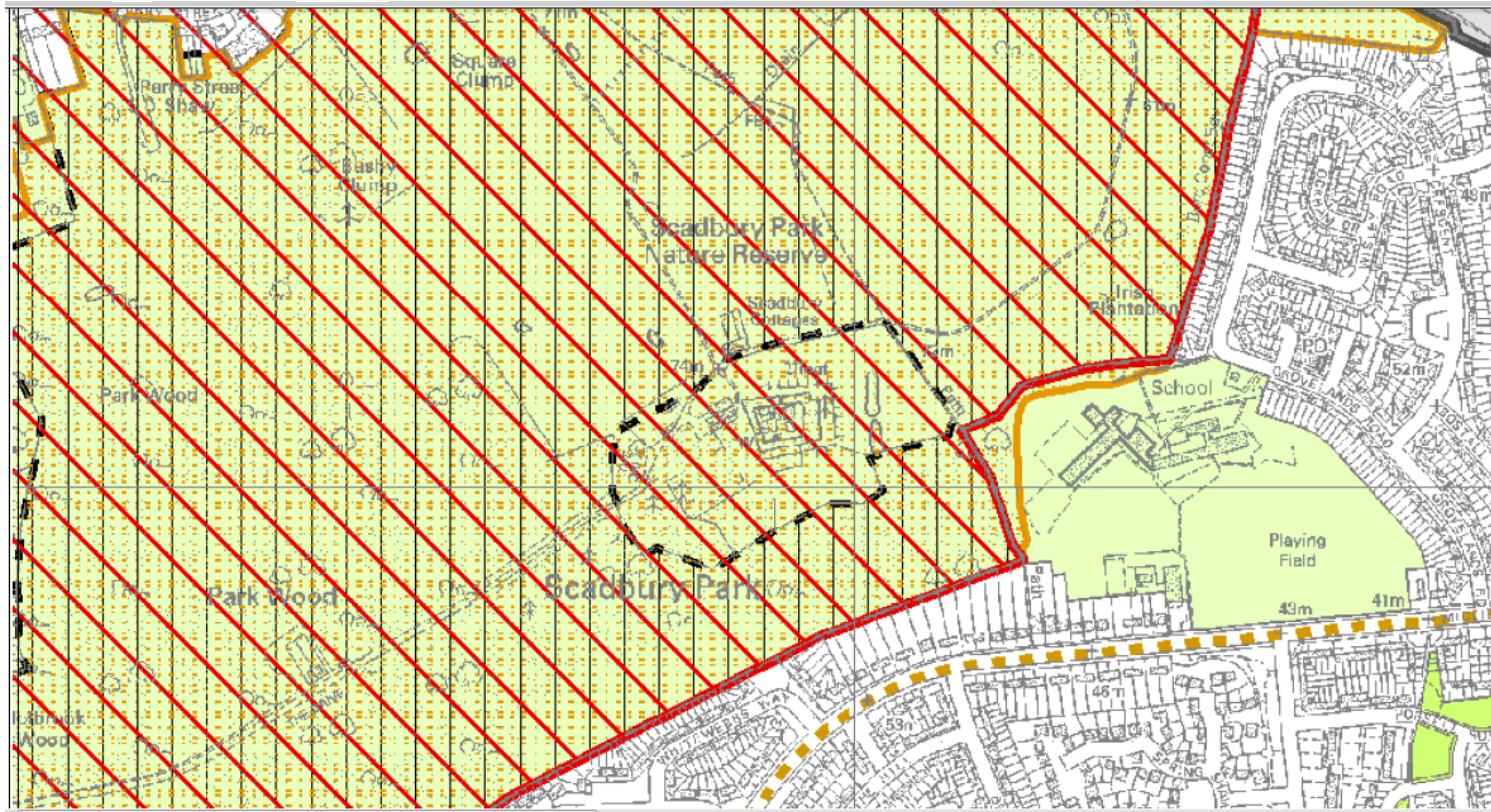


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London Borough of Bromley Environs















DRAFT LOCAL PLAN Map 5

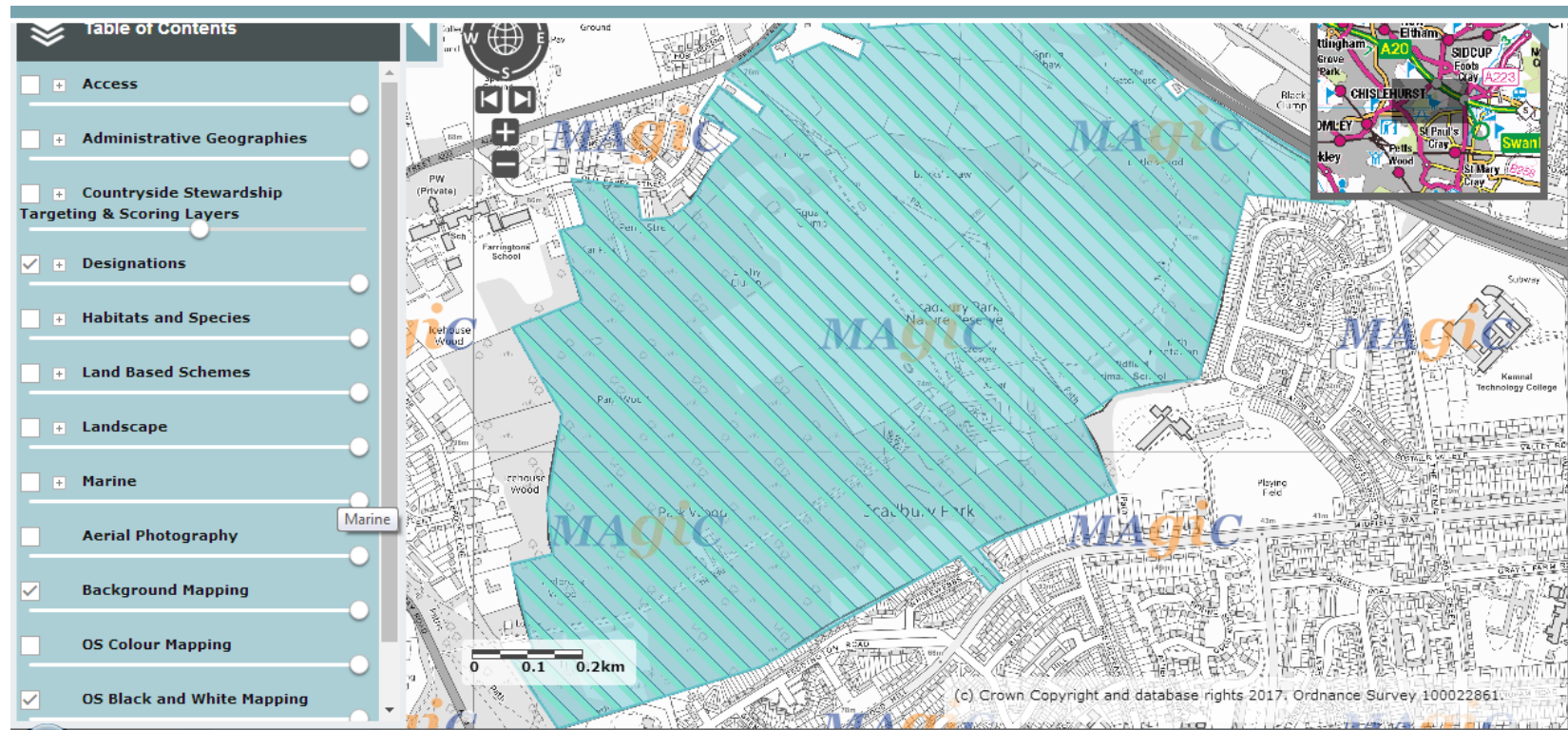


DRAFT LOCAL PLAN KEY

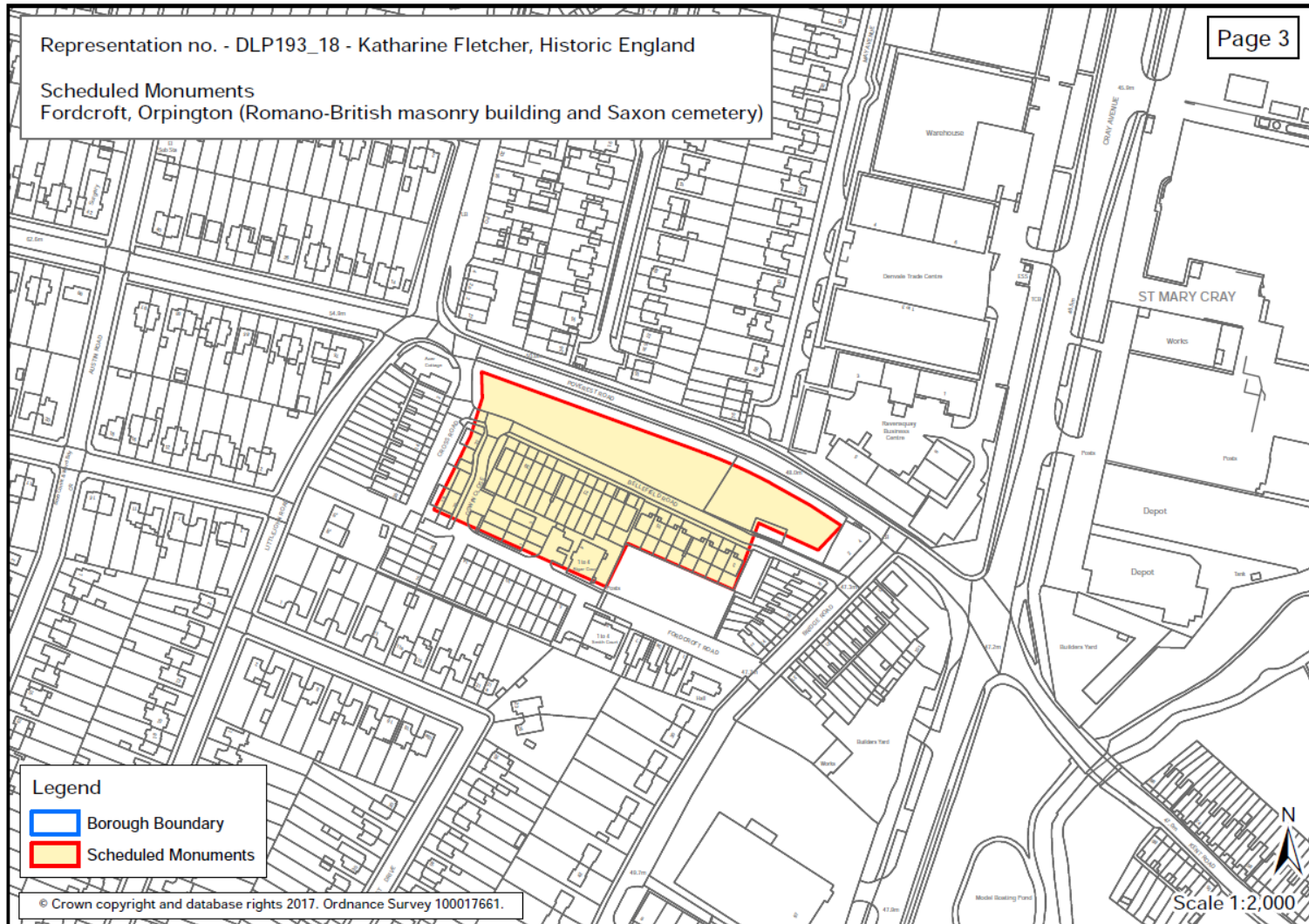
Key

- | | |
|---|---|
|  | Green Belt (UDP boundaries. For changes see Policies Map Set Part 2) |
|  | Metropolitan Open Land (UDP boundaries. For changes see Policies Map Set Part 2) |
|  | Green Chain (UDP boundaries. For changes see Policies Map Set Part 2) |
|  | Urban Open Space (UDP boundaries. For changes see Policies Map Set Part 2) |
|  | Kent Downs Area of Outstanding Natural Beauty (UDP boundaries, no change, designated outside the Local Plan process) |
|  | Sites of Special Scientific Interest (UDP boundaries, no change, designated outside the Local Plan process) |
|  | Sites of Importance for Nature Conservation (UDP boundaries. For changes see Policies Map Set Part 2) |
|  | Local Nature Reserves (These are designated outside the Local Plan process. Two new LNRs have been designated since 2006, There are shown in Policies Map Set Part 2) |
|  | Conservation Areas (These are designated outside the Local Plan process. The only change since 2006 has been to Beckenham Town CentreConservation this is shown in Policies Map Set Part 2) |
|  | Areas of Special Residential Character (UDP boundaries. For changes see Appendix to the Policy Document) |
|  | The Capital Ring (UDP boundaries, no change, designated outside the Local Plan process) |
|  | The Green Chain Walk (UDP boundaries, no change, designated outside the Local Plan process) |

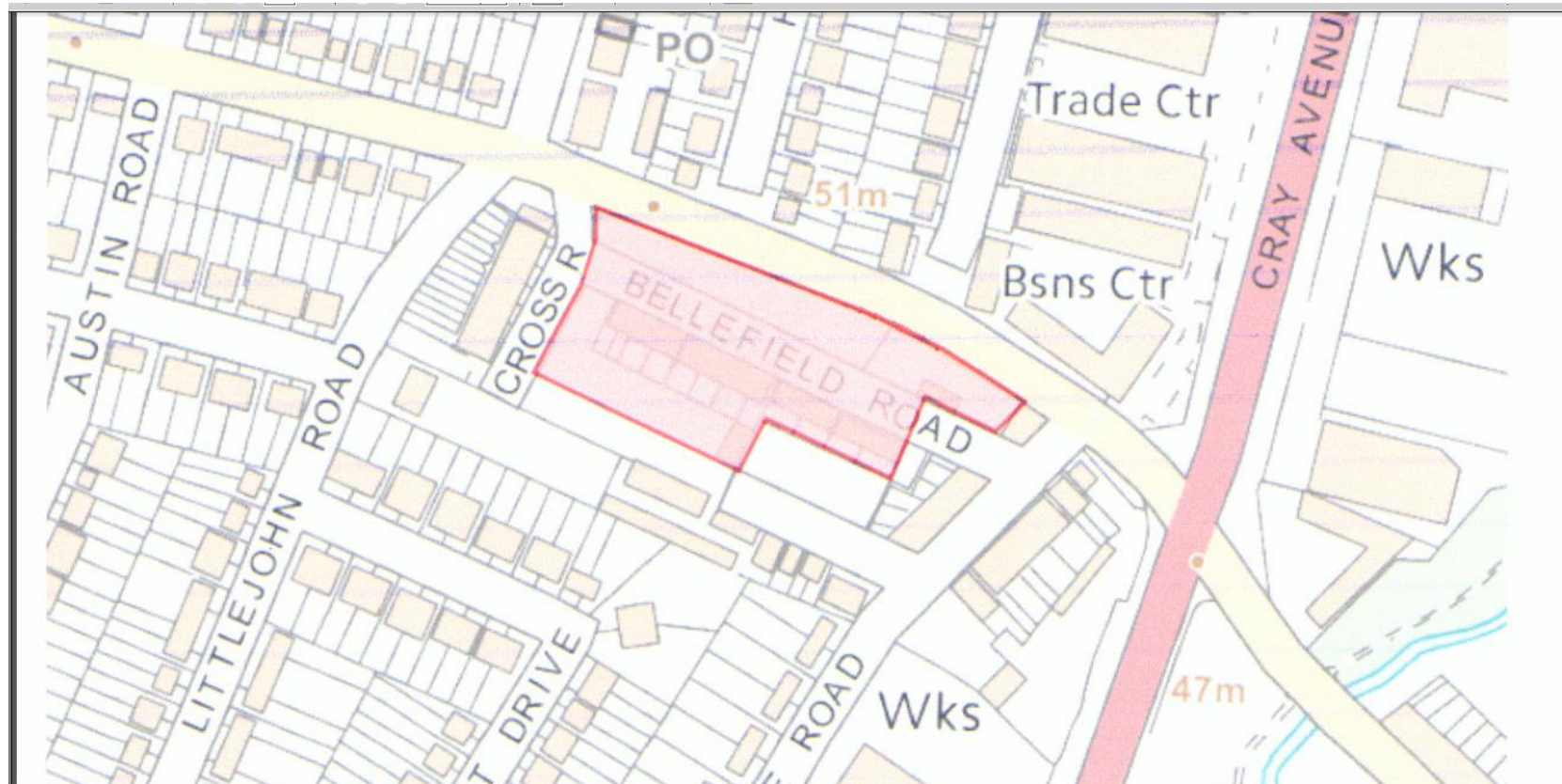
Defra Scadbury Local Nature Reserve Designation



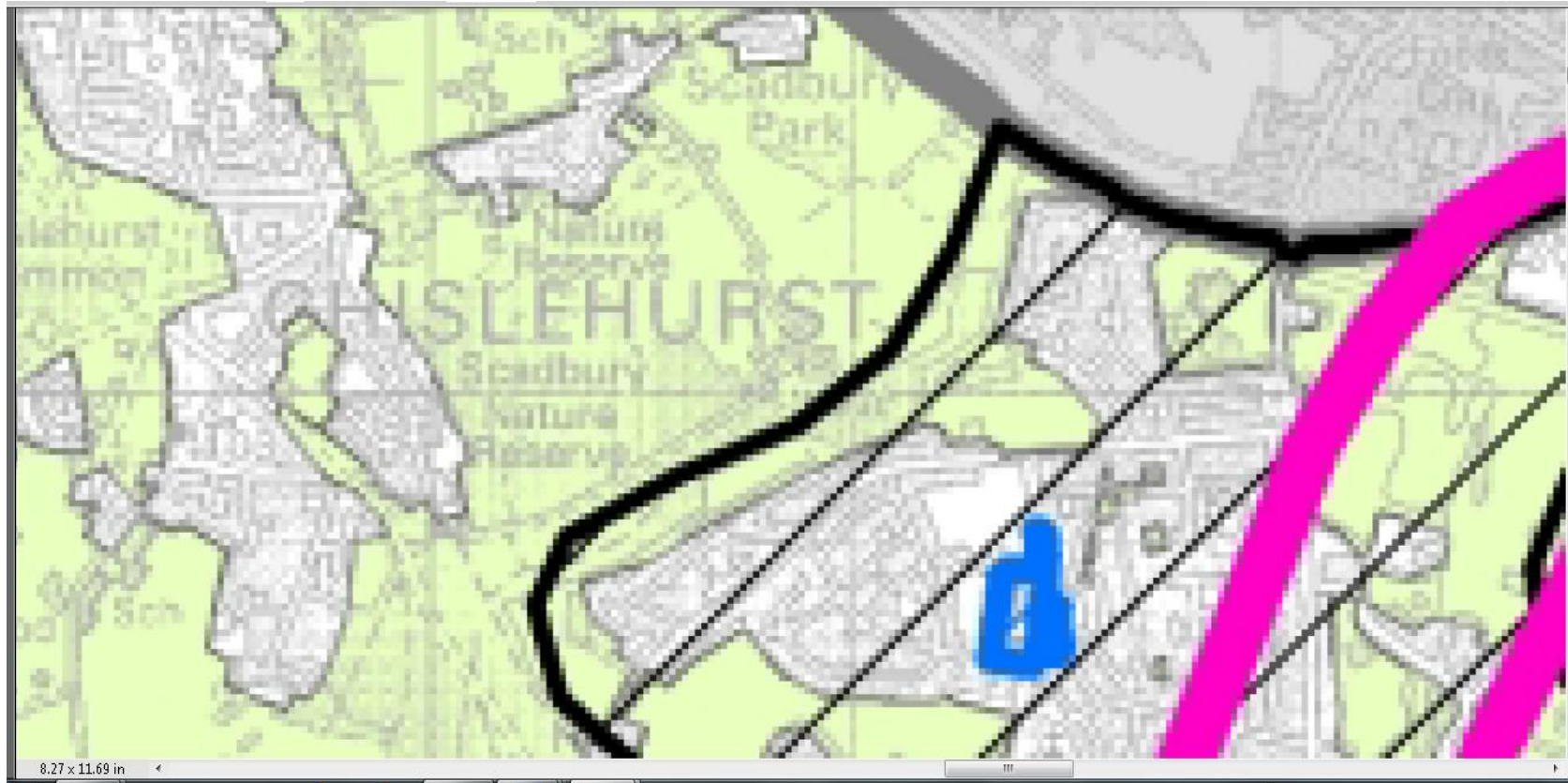
SCHEDULED MONUMENTS - FORDCROFT – HISTORIC ENGLAND SUGGESTED MAP



FORDCROFT - HISTORIC ENGLAND LISTING



DRAFT LOCAL PLAN SPATIAL STRATEGY



DRAFT LOCAL PLAN – SPATIAL STRATEGY KEY

