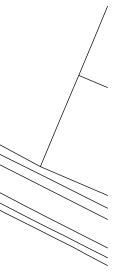


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description



stock wool

The Pump House 19 Hooper Street London E1 8BU 020 7264 8600

MAYBREY WORKS

Site Location Plan

info@stockwool.co.uk

BELLWAY

Client

Project

Drawing

Status

Planning

Scale 1:1250 @ A3

Project no_Drawing no

CAD File 3374-PL(90)-Site_Existing Date 20.12.16 Drawn YU Checked JSn

Revision

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PL(20)01

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Date:	DEVELOPMENT CO EXECUTIVE 13 th July 2015 15 th July 2015	NTROL COMMITTEE	
Decision Type:	Non-Urgent	Non-Executive	Non-Key
Title:	BROMLEY'S LOCAL PLAN - 'POTENTIAL SITE ALLOCATIONS DRAFT POLICY AND DESIGNATIONS ALTERATIONS' FOR CONSULTATION		
Contact Officer:	,	lanning Strategy and Projects mail: mary.manuel@bromley	
Chief Officer:	Chief Planner		
Ward:	(All Wards);		

1. Reason for report

- 1.1 This report seeks Development Control Committee's (DCC) endorsement of Appendix 1 as the consultative 'Local Plan Potential Sites, Draft Policy and Designation Alterations' stage in the preparation of Bromley's Local Plan. DCC is asked to consider the report and refer it to the Executive for approval for the purpose of consultation with residents, partner organisations, and the wider community.
- 1.2 The consultation is made under regulation 18 of the Town and Country Planning Regulations 2012. Early in 2014 the Council consulted on its Draft Policies and Designations, also under regulation 18. The planned consultation focuses on potential draft site allocations, in line with the vision and objectives in the earlier local plan documents. It also includes a limited number of new and revised policies and designations reflecting the requirement for the Local Plan to be in conformity with the London Plan (March 2015), and the updated evidence base. The report also sets out the proposed consultation in line with the Council's Statement of Community Involvement.
- 1.3 The report highlights the potential draft site allocations, policies and designations to be set out in the consultative document. Appendix 1 sets out the substantive content of the consultation document for approval.

2. **RECOMMENDATION(S)**

That Development Control Committee:

2.1 Endorse Appendix 1 as the 'Local Plan – Potential Sites, Draft Policy and Designation Alterations' document for the Executive to agree for public consultation.

That the Executive:

- 2.2 Consider the comments from Development Control Committee with regard to the Local Plan Potential Sites, Draft Policy and Designation Alterations, and
- 2.3 Agree Appendix 1 as the Local Plan Potential Sites, Draft Policy and Designation Alterations document for consultation, subject to the Director of Regeneration and Transformation, in consultation with the Chairman, being authorised to make any minor alterations to the document as required prior to publication.

Corporate Policy

- 1. Policy Status: New Policy:
- 2. BBB Priority: Children and Young People Excellent Council Quality Environment Safer Bromley Supporting Independence Vibrant, Thriving Town Centres

Financial

- 1. Cost of proposal: Estimated cost for the current consultation £3k
- 2. Ongoing costs: Non-Recurring Cost
- 3. Budget head/performance centre: Planning and Renewal
- 4. Total current budget for this head: £2.2m
- 5. Source of funding: Existing controllable revenue budget 2015/16

<u>Staff</u>

- 1. Number of staff (current and additional): 65ftes
- 2. If from existing staff resources, number of staff hours:

<u>Legal</u>

- 1. Legal Requirement: Statutory Requirement
- 2. Call-in: Not Applicable:

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough-wide

Ward Councillor Views

- 1. Have Ward Councillors been asked for comments? Ward Councillors have been invited to participate in earlier stages of the plan preparation, and will be consulted as part of the wider consultation process.
- 2. Summary of Ward Councillors comments: Ward Councillors comments have been taken into account in the preparation of this stage of the Local Plan.

3. COMMENTARY

- 3.1 The Local Development Scheme (LDS) agreed in May 2015 by the Executive sets an ambitious programme for the Local Plan in recognition of the importance of the Borough having an 'up to date plan' as required by Government guidance.
- 3.2 Consultation on the 'Draft Policies and Designations' document was undertaken in early 2014 which followed the 'Options and Preferred Strategy consultation in Spring 2013. DCC considered the response to the 'Options and Preferred Strategy' document consultation undertaken in Spring 2013 at its June 2013 meeting and agreed that the Preferred Options be progressed to draft policies and site allocations, with key issues and areas of potential non-conformity with the London Plan brought back to the Local Development Framework Advisory Panel (LDFAP) and Development Control Committee (DCC) for further discussion.
- 3.3 In 2014 the Council undertook consultation on its Draft Policies and Designations Document (DP&D) which also included a 'Call for Sites' inviting the submission of sites for assessment as potential draft site allocations in the Local Plan. Comments and sites continued to be received during 2014. During this time the Mayor consulted on his Further Alterations to the London Plan, to which the Council made representations. Following an Examination in Public , and an Inspector's report, in March 2015 the revised London Plan was published
- 3.4 As planned this consultation focuses on the identification of Draft Site Allocations, however, it also includes a limited number of revised and new draft policies which are considered important alongside the proposed draft allocations to reflect the requirement for the Local Plan to be in general conformity with the amended London Plan (March 2015) and updated evidence base. The proposed consultation is an 'informal' stage under regulation 18. It plays an important role in ensuring the early and ongoing engagement of the community and partners in the plan making process as required by Government. It provides a timely opportunity for residents, statutory and other partners to respond to, and comment on the draft allocations and ensure that the Draft Local Plan when finalised is a robust and 'sound' plan that also meets regulatory requirements.
- 3.5 The intention is for responses to consultation to be reported to DCC and the Executive alongside the earlier consultation responses to enable consideration to inform the preparation of the Draft Local Plan and the formal consultation under Regulation 19 of the Town and Country Planning Regulations.
- 3.6 The Planning Strategy Team lead the Local Plan preparation, working with officers across the Council and partner organisations, producing further evidence where necessary and developing the plan in line with the 'Vision and Objectives' and the Council's priorities.
- 3.7 Appendix 1 comprises the draft consultative 'Potential Site Allocations, Further Draft Policy and Designations, a key stage in the development of Bromley's Local Plan.
- 3.8 Development Control Committee is asked to consider and comment on Appendix 1 in advance of the Executive being asked to endorse the document for consultation. Comments from the DCC meeting will be reported to the Executive.
- 3.9 The Local Plan sets out the vision and objectives, and the policies against which planning applications will be determined (together with the London Plan) and the priorities against which the plan will be monitored and reviewed. The Local Plan is the spatial expression of Bromley 2020 as the Borough's Community Strategy and extends the vision to 2031.
- 3.10 Bromley's Local Plan, together with the London Plan, when adopted, will form the Development Plan for the Borough. The Local Plan has to be in general conformity with the London Plan (March 2015) and with the National Planning Policy Framework published in March 2012.

3.11 The preparation of the Local Plan has to meet the requirements of planning legislation and regulations, including the Duty to Co-operate introduced in the 2011 Localism Act, (amending the 2004 Planning and Compulsory Purchase Act). Planning legislation and regulations set out procedures to be followed in the preparation of development plans and for the plan to be 'legal and sound'. The Duty to Co-operate places a legal duty on the Council to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. This has been met to date through meetings and dialogue with individual boroughs and partners and sub-regional officer groups and is ongoing. The London Plan is also relevant in the context of Greater London.

3.12 National Context

The National Planning Policy Framework 2012 sets out the four 'Tests of Soundness' against which Bromley's Local Plan will be assessed by the Planning Inspectorate when examined. To demonstrate that the plan is 'sound' the Council the Plan will be:-

- Positively prepared –based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Government published the national planning policy guidance in March 2014, The relevant guidance to the plan making process has been followed

3.13 London Plan 2015

The Local Plan is required to be in 'general conformity with the London Plan. The formal amendments to the London Plan (March 2015) contain several key changes impacting on the preparation of the Local Plan. These include:

- Revised minimum housing figure of 641 homes per annum for the Borough, in the context of 423,887 per annum across London, and an identified need of 49,000 homes over a ten year period.
- Recognition of the need for flexibility for more generous parking standards in parts of Outer London where public transport is very poor.
- Bromley Town Centre designated as an Opportunity Area.
- Crystal Palace identified as a potential Strategic Outer London Development centre.
- Lower level classification of the guidelines for office development in Bromley Town Centre, and removal of office classification for Orpington Town Centre.
- Revised employment forecasts and wording requiring greater flexibility with regard to vacant commercial floorspace in particular, retail and office floorspace.

3.14 Consultation

It is proposed that the consultation on the 'Draft Allocations' follows the format used for the previous stages of the Local Plan preparation as outlined below. This consultation forms an informal stage of consultation in the Local Plan preparation, but a very important one. It will comply with the Council's adopted Statement of Community Involvement (2006).

Evidence of the consultation and engagement undertaken during the plan-making process will be required to demonstrate the Local Plan has followed the prescribed process, as set out in planning legislation and regulations, and the NPPF. This will be a matter for the Inspector at the Examination into the 'soundness' of the Local Plan.

The proposed consultation, as previously will be web based to minimise the costs to the Council and facilitate the analysis of responses. However, to maximise the awareness of the opportunity to respond it will include:

- Emails/ letters to around 1500 contacts on the planning database advising of the consultation details. This includes statutory consultees, adjoining boroughs and other partner agencies, residents associations and individuals, businesses and developers who have registered their interest in being consulted.
- A dedicated webpage and link from the Council's home page.
- Press releases and articles in the local papers and community newsletters.
- Poster and flyers placed in Council offices (including the Civic Centre, Mottingham and Cotmandene Outreach Centres and libraries).
- Article and link to the webpage in Community Links Bromley e-bulletin to over 500 voluntary and community organisations.
- Article and link to the webpage in the Council's business bulletin sent to over 2500 businesses.
- A display promoting the consultation within the Civic Centre
- Inclusion in 'Update' circulated to all residents associations.

In addition copies of the consultation document will be made available for inspection at the Civic Centre, Mottingham and Cotmandene Outreach Centres and Bromley Community Links.

Format of the Consultation Document

- 4.1 The **Introduction and Strategic Context** explain the purpose of the document and set the scene in relation to the scale and nature of the Borough. The Vision, Objectives, and Spatial Strategy forming the basis for the last consultation will be included to provide the context for the Potential Site Allocations, policies and further designations.
- 4.2 The **Spatial Strategy** is then set out, as in the Draft Policies and Designations document, highlighting:
 - Bromley Town Centre a focus for sustainable growth for retail, office, homes, and leisure and cultural activities
 - Cray Business Corridor the main industrial and business area within the borough, providing accommodation for a full range of businesses, and improving the offer for modern business
 - Biggin Hill SOLDC a cluster of businesses focused on aviation and high tech related industries
 - Protecting and enhancing the quality and character of all Bromley's Places
 - Protecting and enhancing the Borough's varied open spaces and natural environment
 - Improvement of Renewal Areas

• Maintaining and enhancing the network of town centres, local centres and neighbourhood parades.

Planning Strategy

4.3 The planning strategy is outlined followed by draft allocations, policies and designations set out under the thematic chapters, where appropriate, used in previous consultations for ease of reference.. The relevant chapters comprise: *Living in Bromley, Supporting Communities, Getting Around, Valued Environments* and *Working in Bromley.*

Draft Revised and New Policies

4.4 The consultation document only includes draft revised and new policies where they directly relate to the revisions to the London Plan 2015 to ensure the emerging Local Plan is in conformity, or to new and revised designations. The policies are set out below, however, the consultation document includes supporting text, and the broader context and links to the associated documents and evidence.

Living In Bromley

Revised Draft Policy - Housing Supply

The Council will make provision for **a minimum of 641** additional homes per annum over the fifteen year Plan period which will be facilitated by:

- i. The development of Proposal Sites;
- ii. Town centre renewal involving the provision of housing;
- iii. The development of housing within Renewal Areas where appropriate;
- iv. The development or redevelopment of windfall sites;
- v. The conversion of suitable properties;
- vi. Mixed use developments including housing in suitable locations;
- vii. The provision of suitable non-self-contained units;
- viii. Vacant properties being brought back into use;

ix. Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities.

Getting Around

Revised Draft Policy - Parking

i. The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms	2 spaces
3 bedrooms	1.5 spaces
1-2 bedrooms	1 space

Except in the three 'parking zones' identified on Maps a, b, c where

The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms 1.5 spaces

3 bedrooms 1 space

1-2 bedrooms 0.7 space

ii. The accessibility, type, mix and use of any new development along with availability and opportunity for public transport will be considered when determining appropriate levels of residential vehicle parking.

iii. Parking for all other types of development is to be provided at levels set out in London Plan (LP) Table 6.2

iv. In addition to the above, developments must:

a. provide designated blue badge parking as per LP Table 6.2.

b. meet minimum cycle parking standards as per LP Table 6.3

c. ensure 1 in 5 spaces have provision (both active and passive) for electric vehicle charge points.

d. make provision for a car club, if above the minimum Transport for London (TfL) threshold.

v. Where parking pressures are identified at and around key public transport interchanges, new parking proposals will be supported on the basis that they do not undermine policies to encourage walking, cycling and public transport use.

vi. For development where servicing problems may arise, the Council will normally require off-street/rear servicing facilities.

Revised Draft Policy - Safeguarding land for transport investment

The Council will continue to safeguard land for the following transport investment schemes:

• A21 Masons Hill, between Kentish Way and the B265 intersection Hayes Lane and Homesdale Road

The Council will continue safeguards currently in force relating to land at:

- A233 Leaves Green Road/Downe Road to Blackness Lane, Keston
- A208 Mottingham Road/ Whitehorse Hill/ William Barefoot Drive/ Elmstead Lane
- B251 Hayes Lane/ Shortlands Road/ Scotts Lane

The Council proposes to explore with TfL the potential for improvements at the junction of the A232 Croydon Road and the A233 Westerham Road and Oakley Road.

The Council proposes the safeguarding of land and route alignment for the following public transport investment (including land for construction and operation):

- Docklands Light Railway from Catford to Bromley South via Bromley North
- Tramlink from Beckenham Junction to Crystal Palace

Valued Environments

Revised Draft Policy - Areas of Special Residential Character

Development proposed within Areas designated as Areas of Special Residential Character on the proposals maps will be required to respect, **enhance and strengthen their special and distinctive qualities.**

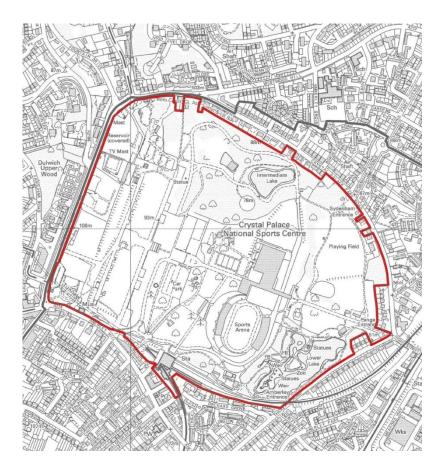
Working in Bromley

New Draft Policy - Crystal Palace Strategic Outer London Development Centre

The Council will expect any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC) as defined on the policies map to maintain enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of the Crystal Palace Park, and particularly the sub-regional importance of the National Sports Centre. Any development proposals will be subject to other policies within the Local Plan, notably Metropolitan Open Land policies and guidance related to the Crystal Palace Park Conservation Area and will be required to be in accordance with the objectives identified as part of the approved masterplan for the park. They will be expected to contribute to and/or strengthen as appropriate the sub-regional importance of the SOLD having regards to its specialist identified strengths whilst maintaining and improving the park's open setting and the visual and landscaping amenities which inform its character and that of the key heritage assets within its boundaries.

The Council will work with the Mayor, the community and other stakeholders to ensure that development proposals and other initiatives within the SOLD contribute to the long term planning and regeneration strategies for the park and support where appropriate the wider Crystal Palace, Penge and Anerley renewal area objectives.

Proposed SOLDC Boundary



The council seeks to retain an adequate stock of good quality office floorspace to meet the forecast employment growth for the Borough.

The offices and sites in the following locations, defined as Key Office Clusters (KOCs) on the policies map, will be safeguarded for office use:

- i Beckenham High Street , Beckenham Town Centre
- ii Crayfield Business Park, The Crays
- iii Knoll Rise, Orpington Town Centre
- iv. Masons Hill, Bromley Town Centre

New Draft Policy - East of South Camp

Development proposals for the area east of South Camp will be restricted to airport and aviation related development. This location is not considered appropriate for non-airport related development but could be used for replacement or relocated flying club buildings, aircraft parking and maintenance and similar aviation facilities.

New Draft Policy - Terminal Area

Development proposals for the Terminal Areas will be restricted to airport and aviation related development. This location is not considered appropriate for non-airport related development.

Potential Draft Site Allocations and Designations

4.5 Table 1 summarises recommended draft site allocations and designations for inclusion in the consultation document. The local plan identifies, designates and safeguards land for a particular use (such as housing, employment, education and open space) to ensure sufficient land is available to implement the Local Plan vision and objectives.

Table 1

Ward	Site	Recommended Draft Designation/Allocation	
Bickley	Vacant Gasholder Station, Homesdale Road / Liddon Rd,	Mixed Use Retail and Residential	
Bickley	St Hugh's Playing Field, Chislehurst Road	Education Use	
Bickley	Land Adjacent to Bickley Station	Residential	
Bickley	Scotts Park Primary School	Safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,	
Biggin Hill	Strategic Outer London Development Centre (SOLDC), Biggin Hill (BH)	For employment development (aviation related) West Camp – remove from Green Belt for aviation related use airside and business/enterprise use as part of the SOLDC Terminal Area – remove from Green Belt for airport and aviation related uses as part of the SOLDC East Camp – retained in Green Belt for aviation and airport related uses as part of the SOLDC Land East of South Camp – remove from Green Belt for aviation and airport related use as part of the SOLDC South Camp - aviation and airport use airside and business/enterprise on remainder of land as part of SOLDC Biggin Hill Locally Significant Industrial Site for business use and part of the SOLDC	
Biggin Hill	Oaklands Primary School	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,	
Biggin Hill	Saltbox Hill	Traveller Site	
Bromley Common & Keston	148 Croydon Road	Traveller Site	
Bromley Common & Keston	The Beechwood Centre, Lower Gravel Road	Locally Significant Industrial Site	
Bromley Common & Keston	Bencewell Business Park, Oakley Road	Locally Significant Industrial Site	
Bromley Common & Keston	Bromley Education Trust (BET) Hayes Lane	Education Use, removal from Green Belt and designation as Urban open Space	
Bromley Common & Keston	Enterprise House, Hastings Road	Locally Significant Industrial Site	
Bromley Common & Keston	Land at Turpington Lane	Education Use, removal from Green Belt and re- designation as Urban Open Space	

Ward	Site	Recommended Draft Designation/Allocation
Bromley	Bromley Industrial	Locally Significant Industrial Site
Town	Centre + others,	
	Waldo Road	
Bromley	1 Westmoreland Rd	Education Use
Town		
Bromley	Bromley Civic Centre	Mixed use with potential education use, housing, civic
Town		centre uses and other town centre uses.
Bromley	Bromley North Station	Mixed use including residential
Town		
Bromley	Masons Hill	Key Office Cluster
Town		
Chelsfield	Chelsfield Park	Area of Special Residential Character
and Pratts	proposed ASRC	
Bottom		
Chislehurst	Edgebury Primary	Safeguarded as Education Land - remove from Green Belt
		and designate as Urban Open Space,
Chislehurst	Land adjacent	Safeguard for Education Use - remove from Green Belt and
	Edgebury Primary	designate as Urban Open Space,
Chislehurst	Mead Road Infants	Safeguarded as Education Land - remove from Metropolitan
	School	Open Land and designate as Urban Open Space,
Chislehurst	Marlings Park Estate	Area of Special Residential Character
	proposed ASRC	
Chislehurst	Land at Bushell Way	Education Use
and		
Mottingham		
& Chislehurst		
North		
Copers Cope	Beckenham High	Key Office Cluster
	Street	
Copers Cope	Maybrey Works,	Mixed use including residential
	Worsley Bridge Road	
Cray Valley	St Mary Cray Primary	Safeguarded as Education Land - remove from Green Belt
East	School	and designate as Urban Open Space,
Cray Valley	Old Maidstone Road	Traveller Site
East	(Council Site)	Traciallan Oita
Cray Valley	Star Lane (Council	Traveller Site
East	Site)	Trouglier Cite
Cray Valley	Trunks Alley,	Traveller Site
East	Hockenden Lane	Trovallar Sita"
Cray Valley	Adj Vinsons	Traveller Site"
East	Cottages, Hockenden	
	Lane Cravfielde Industriel	Kay Office Cluster
Cray Valley	Crayfields Industrial	Key Office Cluster
West	Park Bromlov Vallov	Mixed Lice Including Residential
Cray Valley West	Bromley Valley	Mixed Use Including Residential
VVC31	Gymnastics Club, Chipper field Road	
Cray Valley	Midfield School /	School sites safeguarded for Education Use, removal from
West	Groveland site	Green Belt and re-designation as Urban Open Space
Crystal	Crystal Palace	Strategic Outer London Development Centre
Palace	Urysiai Falaue	Strategic Outer London Development Centre
Crystal	James Dixon Primary	Safeguarded as Education Land - remove from Metropolitan
Palace	School	Open Land and designate as Urban Open Space,
	001001	

Ward	Site	Recommended Designation/Allocation	
Darwin	Higham Hill Farm, Layhams Road Keston	Locally Significant Industrial Site	
Darwin	Kimberley Business Park, Blackness Lane	Locally Significant Industrial Site	
Darwin	Meads Green, Millies View, St Joseph's Place, Layhams Road	Traveller Sites	
Darwin	Keston Mobile Park, Layhams Road	Traveller Site	
Darwin	Keston's Showman's Park, Layhams Road	Traveller Site (Travelling Showmen's Yard)	
Darwin	Land at junction with Sheepbarn Lane	Allocate as Traveller Site (extending the Travelling Showmen's Yard Traveller Site)	
Farnborough and Crofton	No new proposed alloc	cations/designations	
Hayes and Coney Hall	Wickham Common Primary	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,	
Kelsey & Eden Park	Langley Park Girls & Boys Schools	Safeguarded for Education Use, removefrom Green Belt and designate as Urban Open Space	
Kelsey & Eden Park	Former Co-op Sports Ground, Balmoral Avenue	Safeguard for Education Use (retained as Urban Open Space)	
Mottingham & Chislehurst North	Castlecombe Primary and Youth Centre	School site safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,	
Orpington	Former Milk Depot, Bruce Grove	Mixed use including residential	
Orpington	Knoll Rise	Key Office Cluster	
Penge & Cator	Franklin Industrial Centre, Franklin Road	Locally Significant Industrial Site	
Petts Wood and Knoll	No new proposed allocations/designations		
Plaistow and Sundridge	No new proposed allocations/designations		
Shortlands	No new proposed allocations/designations		
West Wickham	No new proposed allocations/designations		

Ward	Site	Recommended Draft Designation/Allocation
Parking Standards - Revised		
Bromley Town, Plaistow & Sundridge, Shortlands	Parking Area covering area including parts of wards focused on Bromley Town Centre with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Orpington, Farnborough & Crofton, Petts Wood & Knoll	Parking Area covering areas within wards focused on Orpington Town Centre with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Crystal Palace, Penge & Cator, Clock House, Copers Cope	Parking Area identified including areas within wards in the NW of the borough with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Borough- wide	Various extended, new and upgraded SINCs	Extended, new and upgraded Sites of Importance for Nature Conservation (SINCs)
Bromley Common and Keston	Junction A232 Croydon Road and A233 Westerham Road and Oakley Road (Keston Mark)	Junction improvements

4.6 The consultation process will include the opportunity for comments on all the draft designations, policies and potential site allocations. Maps will be included where appropriate. However, where these are numerous and large in terms of complexity and electronic size they may be provided in a separate document for ease of reading and reference. A series of appendices will be attached and links to background documents and the evidence base. This includes information regarding all the sites submitted in response to the 'Call for Sites'. Sites assessed for potential housing or mixed use as part of the site assessment process but not recommended to be taken forward as potential site allocations in the consultation document are set out in Table 2.

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Bottom		
Chislehurst Beaverwood Depot, Beaverwood Rd, Chislehurst		
Chislehurst Flamingo Park, Sidcup Bypass, Chislehurst		
Chislehurst Land on the North West side of Kemnal Road, Chisle	ehurst	
Chislehurst Virgin Active Health Club, Sidcup By-pass, Chislehu	Virgin Active Health Club, Sidcup By-pass, Chislehurst	
Chislehurst World of Golf, A20 Sidcup By-pass		
Chislehurst Land off Bushell Way	Land off Bushell Way	
Clock House National Grid Site, Churchfields Road, Beckenham		
Copers Cope Former Nat West Bank Sports Ground, Copers Cope	Road	

Copers Cope	SeGas sports ground, Worsley Bridge Road	
Cray Valley West	Crayfields Business Park (Area 1), Main Road St. Pauls Cray	
Cray Valley East & West	Crayfields Business Park (Area 2a), Main Road St. Pauls Cray	
Cray Valley East	Crayfields Business Park (Area 2b), Main Road St. Pauls Cray	
Cray Valley West	Crayfields Business Park adjoining open land (Area 3), Main Road St. Pauls Cray	
Cray Valley East	Crayfields Business Park adjoining open land (Area 4), Sandy Lane, St. Pauls Cray	
Cray Valley East & West	Crayfields Business Park adjoining open land (Area 5), Sandy Lane. St. Pauls Cray	
Cray Valley East	Land rear of Tesco, Edgington Way	
Cray Valley East	Land off Chapmans Lane, Chalkpit Avenue, St Paul's Cray	
Cray Valley East	Ruxley Cottage, Maidstone Road	
Cray Valley East	Lower Hockenden Farm, Hockenden Lane	
Cray Valley West	Gasholder Station St Mary Cray, Lessons Hill/ Sevenoaks Way, St Mary Cray	
Cray Valley West	Bournewood Quarry, off A20	
Cray Valley West	Land fronting Sevenoaks Way, adjoining Ruxley Lakes	
Darwin	Land north west of Leaves Green Road Keston	
Darwin	Land at Leaves Green Road (A233) Keston	
Darwin	Land to the south-east of Belvedere Road, Biggin Hill	
Darwin	Land to west of Blackness Lane (Adj Foxley) Keston	
Darwin	Layhams Farm, Layhams Road, Keston	
Kelsey and Eden Park	Land at North End Drive	
Orpington	Priory Gardens Depot, High Street, Orpington	
Penge and Cator	Penge Auto Sprays, 85 Maple Road, Penge	

4.7 As indicated earlier the Local Plan process requires particular stages and steps to be followed to be found 'sound' at the Examination in Public. This also applies to associated documents including the Infrastructure Delivery Plan and supporting documents to introduce a Community Infrastructure Levy to help deliver the Local Plan. The Council has to pay the costs of the Examination in Public together with the cost of the further consultation stages of the plan preparation and the production of evidence where gaps need to be addressed or updates required as circumstances change.

5 POLICY IMPLICATIONS

- 5.1 Bromley 2020 as the Sustainable Community Strategy for the Borough was the starting point for developing the Core Strategy Issues Document in 2011 and for the Vision and Objectives in the Options and Preferred Strategy stage of the Local Plan preparation. The Local Plan will extend this vision until 2031 and contributes to all the priorities within Building a Better Bromley. The Local Plan together with the London Plan will form the development plan for the Borough. The Local Plan, once adopted will replace the saved policies of the UDP.
- 5.2 The Local Plan has to be in general conformity with the London plan (March 2015) and with the National Planning Policy Framework published in March 2012. Importantly the Local Plan sets out the vision and objectives, and the policies against which planning applications will be determined (together with the London Plan) and the priorities against which the plan will be monitored and reviewed.

6 FINANCIAL IMPLICATIONS

- 6.1 The cost of the consultation process for this stage of the Local Plan is estimated to be in the region of £3k which will be funded from the local plan budget within Planning.
- 6.2 The Executive agreed a carry forward sum of £60k to fund the preparation of the Council's Local Plan in June 2015. The revised timetable in the Local Development Scheme agreed by the Executive in May 2015 indicated that the examination of the Plan will now take place during 2016. A further request may have to be made to the Executive to carry forward some or all of the £60k into 2016/17, in order to meet the future costs of the examination in public and to undertake any further evidence work required.

7 LEGAL IMPLICATIONS

7.1 The proposals are consistent with the planning legislation and regulations.

Non- Applicable Sections:	Personnel Implications
Background Documents: (Access via Contact Officer)	Report No DR 14/002 DCC and Executive 'Draft Policies and Designations for Consultation' Report No DRR13/016 DCC 29/1/13 Bromley's Local Plan – Options and Preferred Strategy for Consultation Report to Executive 12/6/13 Growth and Delivery Plans for Bromley Town Centre, Biggin Hill and Cray Corridor Employment Areas Report No DRR13/082 DCC Report on Local Plan 'Options and Preferred Strategy' consultation June 2013 Bromley 2020 Bromley's Community Strategy National Planning Policy Framework March 2012 London Plan (March 2015)) LBB UDP 2006 (Saved) Local Plan Evidence Base http://www.bromley.gov.uk/ldf

Bromley's Local Plan Potential Site Allocations, Limited Revised & New Draft Policies & Designations.

Proposed Consultation – Beginning of September to 16th October 2015

To avoid starting consultation in the main summer holiday period it is suggested that consultation commences at the beginning of September and provides six full weeks for residents, businesses, partner agencies and the wider community to be fully involved in the process.

The format and layout of the document will be unified once incorporated into the specialist consultation software, with space for comments on each section. It will then be available via the Council's website, consultation portal and in local libraries.

Contents

- 1. How to Give Your Views
- 2. Introduction
- 3. Vision and Objectives
- 4. Spatial and Planning Strategy
- 5. Living in Bromley
- 6. Supporting Communities
- 7. Getting Around
- 8. Bromley's Valued Environments
- 9. Working in Bromley

Appendices (to final document)

- Extracts from the London Plan 2015 where needed
- Glossary

Additional Document A - Sites of Importance for Nature Conservation (SINCs) Additional Document B - Site Assessments

How to Give Your Views

The Draft Allocations, Further Policies and Designations Document is available for comment from

Your views are sought on whether you agree with the draft allocations and limited number of related key draft policies set out in the document and their ability to contribute to achieving the vision, objectives and spatial strategy for the Borough.

The document is designed for you to be able to comment online on each section. You may comment on as little, or as much of the document as you wish.

Respond Online:

If you are able to access the Internet, you will find our consultation portal is the easiest and quickest way to tell us what you think.

Online Consultation Portal:

http://bromley-consult.limehouse.co.uk/portal/lpdpd/lpdpdc

If you have not already used the Portal, we encourage you to do so. It is a very simple process and once registered you will automatically be informed when we publish other planning consultation documents.

Other Ways to Comment:

While the consultation is designed for on-line responses, the Council wishes to ensure that everyone has the opportunity to respond. Therefore there are printed copies of this document available to be viewed in all Bromley libraries, the Cotmandene and Mottingham Community and Learning Shops, at Bromley Civic Centre and Community House. (see below for addresses). There is a comments response form available when viewing the document which can be completed.

If you, or someone you know needs the document in a particular language or format, please contact us.

If you are not using the Portal, please email or send your comments to us using the following details:

Email: Idf@t

ldf@bromley.gov.uk

Postal address:

Planning Strategy Team London Borough of Bromley Civic Centre Stockwell Close Bromley BR1 3UH Phone: 020 8313 4730

Please ensure your comments reach us by

This isn't the only opportunity to be involved in the development of the Local Plan but it is a key stage and your views are important.

Next Steps

The responses to this document will be reported to the Council's Development Control Committee and Executive and help inform the preparation of the 'Draft Local Plan'.

Civic Centre Stockwell Close Bromley BR1 3UH

Open 8:30am – 5pm Monday – Friday

Cotmandene Community Resource Centre 64 Cotmandene Crescent St Paul's Cray Orpington BR5 2RG

9.30am to 1pm, 2pm to 4pm Monday – Thursday.

Closed all day Friday.

Mottingham Community and Learning Shop

1-2 Cranley Parade Beaconfield Road Mottingham SE9 4DZ

Mondays - closed. Tuesday to Friday 9:30am - 1pm and 2 - 4pm

All responses (online, emails and letters) must be received by 5.00pm

2015.

Please note that all responses will be made available for public inspection.

Introduction

This document forms a key stage in the development of Bromley's Local Plan which together with the London Plan (March 2015) will form the Development Plan for the Borough.

The Local Plan will set out the vision and objectives to 2031 and the planning policies to support their delivery. When finalised it will also include a policies map showing designations and site allocations, and incorporate an Infrastructure Delivery Plan to support the delivery of the vision and objectives.

Purpose of this consultation document

This document provides another opportunity for local residents, businesses, partner agencies and the wider community to be involved in the plan-making process.

It builds on the earlier public consultation work undertaken by the Council in preparing the Local Plan, in particular, the 'Options and Preferred Strategy' document in Spring 2013, and the Draft Policies and Designations Document in 2014 as well as the ongoing engagement with the community, partner agencies and other local authorities in line with Council's adopted Statement of Community Involvement and its Duty to Co-operate under the Localism Act 2011.

The Draft Policies and Designations document in 2014 included a 'Call for Sites' inviting details of sites to be considered for potential inclusion as a 'Site Allocation' within the draft Local Plan and how they could contribute to the vision and objectives for the Borough.

This document invites comments on the sites identified as Draft Site Allocations. It also includes a limited number of new and revised policies, and designations which provide the context for the draft site allocations, and the requirement of the Local Plan to be in 'general conformity' with the London Plan.

Structure of the Document

After this introductory chapter, the *Vision and Objectives for the borough* are set out, as included in the 2014 Draft Policies and Designations document for ease of reference.

This is followed by the *Strategic Context* which briefly sets out the key economic and social trends, the national and London context and the challenges and opportunities for the Borough. It then presents the *Planning Strategy* which incorporates the 2014 Spatial Strategy for the borough, and sets out the approach to delivering the vision and objectives for the borough as a whole, and in particular the role of the Draft Site Allocations, while ensuring conformity with the National Planning Policy Framework (2012) and the London Plan (2015).

The **thematic chapter headings** from earlier Local Plan consultations are used to structure the proposed draft site allocations, as well as a limited number of new and

revised draft policies and draft designations for ease of reference. However, not all themes have Proposed Draft Site Allocations and therefore aren't included in the document. The table below summarises the position.

Theme	Proposed Draft Site Allocations	New/Revised Draft Policies	New/revised Draft Designations
Living in Bromley	Housing and Mixed use Sites	Housing Supply	
Supporting Communities	Education Sites		Education Sites
Getting Around		Parking Standards Safeguarding land for transport investment	Areas for Parking standards
Valued Environments	n/a	Areas of Special Residential Character	Areas of Special Residential Character Sites of Importance for Nature Conservation
Working in Bromley		Key Office Clusters	Key Office Clusters, Locally Significant Industrial Locations,
		Biggin Hill SOLDC, East of South Camp, Terminal Area	Biggin Hill SOLDC
		Crystal Palace SOLDC	Crystal Palace SOLDC
Environmental Challenges	n/a	n/a	n/a

Summary: Draft Allocations, Policies and Designations by Theme

Each thematic chapter sets out the context, methodology and evidence base underpinning the proposals. More detailed information is available in background papers.

Making your views known

The focus of the consultation is the five thematic chapters; however, comments can be made on the vision, objectives and spatial strategy which were part of the 2014 Draft Policies and Designations consultation document.

The responses to this document will be reported together with the responses from the previous consultation to the Council's Development Control Committee and its Executive. In light of the responses, the changing national and London landscape, and any update to the evidence base the intention is to prepare the Draft Local Plan for consultation. This will in due course include a formal consultation under Regulation 19 of the Town and Country Planning Regulations 2012.

Relationship with the 2014 Draft Policies and Designations Document and the Mayor's Further Alterations to the London Plan.

Last year the Council consulted on its 'Draft Policies and Designations Consultation Document' (DP&D) focusing on development management policies and designations taking forward the response to the 'Draft Options and Preferred Strategy' document (2013). The DP&D included a 'call for sites' inviting the submission via a proforma of sites to be considered as Draft Site Allocations in the Local Plan to support the delivery of the vision and objectives.

At the same time as the Council consulted on its DP&D, the Mayor of London published his Draft Further Alterations to the London Plan for consultation. As the Council's Local Plan is required to be in 'general conformity' with the London Plan, changes have to be considered for their implications for the emerging borough plan.

Following an Examination in Public and Inspector's report (*), the Mayor published the revised London Plan (March 2015) which has several key changes which are reflected in the Council's drafting of this document. In particular:

- The increase in the minimum housing figure for Bromley of 641 houses per annum for 2015/2025
- The importance of identifying // sites to optimise housing, including town centres, poorer quality commercial space,
- The revised population projections, and identification of pressures, for instance, for primary and secondary school places.
- Recognition that in parts of outer london a more generous approach to residential parking standards may be appropriate.
- Designation of Bromley Town Centre as an Opportunity Area
- The identification of Crystal Palace as a potential Strategic Outer London Development Centre

In addition to contributing to the revision of the Local Plan, the Council has continued to take into account the London Plan's evidence base to update its evidence base to support the preparation of the Local Plan, engage with local communities and to work with other local authorities, in particular adjoining boroughs and district councils, and the Greater London Authority and partner agencies to meet its Duty to Co-operate.

Bromley Town Centre Area Action Plan

The Council adopted the Bromley Town Centre Area Action at the end of 2010 and this will continue as adopted policy and a Development Plan Document as part of the Bromley 'Local Plan' together with the Borough-wide Local Plan.

The 2015 London Plan designated Bromley Town Centre as an 'Opportunity Area' and the Council will work with the Greater London Authority to optimise the contribution that the Town Centre can contribute to the borough's Local Plan vision and objectives, and the London Plan Policy () for Opportunity Areas. It is proposed that following the adoption of the Bromley Borough-wide Local Plan that the Bromley Town Centre Area Action Plan (BTCAAP) will be reviewed consistent with the Opportunity Area provisions in the London Plan. Unless specifically referred to, the allocations in the BTCAAP will not be altered by the Borough-wide Local Plan.

Strategic Approach

The planning strategy is set out in chapter x demonstrating the Council's approach to delivering its vision and objectives for the borough, while being in conformity with the London Plan and National Planning Policy Framework. The 'golden thread' through the NPPF, London Plan and the emerging Local Plan is balancing the economic environmental and social well-being of the Borough.

Site Allocations will be included in the Draft Local Plan as a key element of its delivery. Therefore the draft site allocations cover housing and mixed use sites, gypsy and traveller sites, education and employment sites.

The London Plan was revised in March 2015, and as outlined earlier includes several changes impacting on the development of Bromley's Local Plan. This has contributed to several new and revised policies in this document. In addition, the liberalisation of permitted development rights, in particular the change of use of offices to residential has led to the creation of draft key office clusters.

Economic growth is focused on the three areas of Bromley Town Centre, Biggin Hill Strategic Outer London Development Centre, and the Cray Business Corridor.

Housing growth is focused in town centres, and areas of good accessibility with smaller infill development likely across different parts of the borough.

Social infrastructure is distributed across the borough to serve local communities.

Infrastructure Requirements

Although in general the recommended sites for inclusion in the Draft Local Plan, for new development are in areas already well served by infrastructure provision, it is important the specific site allocations in the Draft Local Plan are supported by the necessary infrastructure to ensure sustainable development takes place. Some of this will be site specific and will be identified within specific allocations, but, in other cases, growth in general will need to be supported by additional physical, social and green infrastructure to cater for the additional population and provide services and facilities.

The Council prepared an early draft of an Infrastructure Delivery Plan (2013) which is currently being updated. This will be included as part of the Draft Local Plan and an Infrastructure Plan will be regularly reviewed.

The Council is currently preparing a borough Community Infrastructure Levy in accordance with the 2011 Localism Act and the Community Infrastructure Regulations 2010 (as amended). The levels of any proposed CIL charged will be separately consulted on and do not form part of the Local Plan process.

Vision and Objectives

Vision

Bromley 2031

Introduction

This section restates the Vision and Objectives for the Borough set out in the Draft Policies and Designations document 2014 for ease of reference.

"Bromley is known for the high quality of its living, working and natural environments. The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives.

Bromley values its distinctive neighbourhoods, ranging from the rural to suburban and urban. Neighbourhoods provide a choice of good quality homes, jobs and a range of shops and services appropriate to the different town, district and local centres. Bromley Town Centre is recognised for its cultural and leisure facilities and vibrant high quality shopping experience.

The protection and enhancement of conservation areas and historic assets such as Downe House, Crystal Palace and Biggin Hill, along with high quality new development have contributed to civic pride and wellbeing.

The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley's special character and the health and wellbeing of local residents and visitors alike.

Bromley has high levels of educational attainment, whilst strong and diverse businesses are able to invest to support a thriving economy."

Open Space and the Natural Environment

The value of natural spaces, whether private gardens, rivers, lakes or Green Belt, is recognised and afforded a high priority. Land, air and water environments are sustainably managed, ensuring that the wide range of different open spaces and habitats, with their distinctive animal and plant life, are well managed and accessible. As well as helping conserve and enhance biodiversity, Bromley's natural environment supports the wellbeing of its communities, with open spaces and trees providing healthy environments and space for leisure and sport. Opportunities are taken to increase natural habitats, especially in areas with a deficiency, linking them together and improving their quality and accessibility.

1

Objectives:

- Manage, protect and enhance natural environments.
- Encourage the protection and enhancement of biodiversity.
- Ensure that the Green Belt continues to fulfil its functions.

• Improve the quality of open space and encourage provision in areas of deficiency and in any new development.

Health and Wellbeing

The quality of life in Bromley has improved in all its neighbourhoods with all residents enjoying better health and wellbeing. Areas with a concentration of social and/or environmental difficulties are being improved. Communities are served by local shopping parades, education, healthcare, leisure, community and cultural facilities, including libraries and places of worship. New facilities are encouraged in accessible locations to deliver flexible and efficient community hubs. The environment is designed to maximise accessibility for people with disabilities. Residents are helped to improve their own places and local environments for the benefit of all the community. There is less crime and anti-social behaviour.

Objectives:

• Produce healthier environments and infrastructure to support people in living fuller, longer, healthier, more sustainable lives.

• Co-ordinate the improvement of Bromley's designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments.

• Neighbourhoods offer good quality homes and an accessible range of shops and services, appropriate to the roles of the different centres - from town centres to local neighbourhood centres and parades.

• Ensure new community facilities are appropriately located to provide accessible, effective and modern services, and resist the net loss of facilities.

Homes

A range of decent homes of different types and sizes are available and housing supply is tailored to local needs. Any new housing complements and respects the character of neighbourhood in which it is located, paying particular attention to the density of development, parking requirements and improving the choice of accommodation available.

3

Objectives:

• Ensure there is an appropriate supply of homes to meet the varied needs of the local population, which responds to changing demographics, in particular as the population ages.

• Ensure new residential development, extensions and conversions complement and respect local character.

• Ensure new homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure.

Business, employment and the local economy

Bromley is a prosperous, thriving and skilled borough where businesses choose to locate. New businesses start up and grow using local skills, supply chains and investment and Business Areas offer high quality flexible accommodation. There is an improved range of employment opportunities for residents and education and skills levels have been raised throughout the Borough.

4

Objectives:

Business Areas adapt successfully to the changing needs of modern industry and commerce.

• Ensure there is an appropriate supply of commercial land and a range of flexible quality business premises across the borough.

• Ensure businesses contribute to a high quality, sustainable environment, through their premises development and locational decisions.

Support the appropriate provision of facilities to deliver high quality education and training.

• Support the Strategic Outer London Development Centre (SOLDC) designation at Biggin Hill to enhance the areas employment and business opportunities, whilst having regard to the accessibility and environmental constraints.

• Support the digital economy and the infrastructure required for it and modern business, such as high speed fibre connections.

Town centres provide a range of goods and services and are safe, clean and welcoming for all. Bromley Town Centre is a competitive Metropolitan Town Centre, complementing others in the region and attracting a wide range of visitors to its shopping, cinema, theatre and restaurant areas. Orpington functions as a strong and vibrant major centre, offering a good range of shopping, leisure and public amenities. These centres, together with the district, local and neighbourhood centres, provide accessible shops, services and facilities for residents and wider communities across the Borough.

5

Objectives:

• Ensure vitality of Bromley Town Centre, delivering the aims of the Area Action Plan.

• Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes.

- Support the continued improvement of Orpington and other district and local centres.
- Encourage safe town centres and a prosperous evening economy.

• Maintain and improve neighbourhood centres and parades across the Borough to ensure locally accessible facilities.

Design and the public realm

New development of all kinds is well designed, safe, energy efficient and complements its surroundings, respecting the existing scale and layout. Private or public open space, and appropriate car parking are key considerations. Public art and street furniture make places more attractive and comfortable for users. Our roads and streets are clean but uncluttered, with street trees and verges improving their appearance.

6

Objective:

- Ensure development attains high quality design standards.
- Ensure development includes appropriate well planned private or public open space.
- Ensure public areas are well designed, safe and accessible.

Built heritage

Our man-made heritage assets; areas of distinctive character, listed buildings, conservation areas and monuments, are protected and enhanced. No historic features are considered to be "at risk" and underused heritage assets are brought back into productive uses. The Borough's rich heritage is widely enjoyed.

Objective:

7

- Continue to protect locally and nationally significant heritage assets.
- Ensure development complements and improves the setting of heritage assets.
- Encourage greater accessibility of heritage assets.

• Encourage a proactive approach to the protection and improvement of heritage assets to contribute to strategic, local planning and economic objectives.

Transport

Moving around the borough is easier due to reduced road congestion and improved public transport networks. Commuting traffic has reduced as more people share car journeys and choose alternative ways of working and travelling. Reduced road traffic results in less pollution and greenhouse gases from transportation. Any new development should where appropriate include electric vehicle charging points and there are more car clubs, increasing travel choices for local people. Walking and cycling to work, school and for leisure, has increased and the road

environment is safer for vulnerable users. Public transport is more accessible to those with mobility problems and is safer and more reliable.

8

Objectives:

• Reduce road congestion at peak times through better management of the network and encouraging patterns of development that reduce the need to travel and by improving road junctions and layouts whenever and wherever possible.

• Support improvements to public transport links, including associated parking, and facilitate environments that encourage walking and cycling.

• Locate major developments where they can maximise the use of public transport.

• Ensure new developments include electric charging points, cycling facilities such as dedicated cycle routes, and car clubs where appropriate, increasing choice for local people

• Ensure streets are safe, accessible and uncluttered, improve road safety and reduce air and noise pollution from traffic.

• Ensure the efficient movement of freight, whilst minimising its impacts on the transport network.

• To secure investment in critical public transport infrastructure to improve transport connectivity and orbital movements to East London.

Environmental challenges

New development is designed in such a way as to not only enhance the character of the area but also to ensure it does not worsen any environmental problems. Buildings are resource efficient, using less energy, producing less carbon and conserving water. Opportunities for appropriate low carbon, decentralised energy networks and renewable energy are considered and flood risk is reduced. Less waste is produced and more is managed and disposed of locally through new cleaner technologies. Pollution control prioritises key local problems and new development helps bring contaminated land back into use.

9

Objectives:

• Reduce environmental impacts and the use of precious resources in the design and construction of new development.

• Support the development of local energy networks and low-carbon and renewable energy generation.

• Improve the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised.

• Reduce the amount of waste that ends up in landfill, particularly biodegradable waste, and increase self-sufficiency.

• Reduce air pollution and minimise problems of noise and light pollution. Ensure contaminated land can be remediated where possible.

PLANNING STRATEGY

Introduction

The Draft Policies and Designations document (2014) set out a spatial strategy for the Local Plan identifying locations for strategic development and in broad terms the location for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated.

The Focus for the Spatial Strategy

- Bromley Town Centre a focus for sustainable growth of retail, office, homes, and leisure and cultural activities.
- Cray Business Corridor the main industrial and business area within the Borough, providing accommodation for a full range of businesses, and improving the offer for modern business.
- Biggin Hill SOLDC a cluster of businesses focused on aviation and high tech related industries.
- Protect and enhance the quality and character of all Bromley's Places.
- Protect and enhance the Borough's varied open spaces and natural environment.
- Improvement of Renewal Areas.
- Maintain and enhance the network of town centres, local centres and neighbourhood parades.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the three dimensions to sustainable development: economic, social and environmental, and the purpose of planning to contribute to the achievement of sustainable development.

For plan-making this means that:

- "local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably

outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

- specific policies in this Framework indicate development should be restricted".

The NPPF (paragraph 17) sets out 12 core planning principles which the emerging Local Plan has incorporated. . This includes " proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and

other development needs of an area, and respond positively to wider opportunities for growth".

The National Planning Practice Guidance (2014) advises that "the NPPF should be read as a whole, need alone is not the only factor to be considered when drawing up a Local Plan".

The Planning Policy for Travellers Sites (2012) sets out the Government's approach to the provision for Gypsies and Travellers which the Council has complied with in the Gypsy and Traveller section of the Living in Bromley chapter.

Conformity with the London Plan 2015

Section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004 requires the Council's development plan documents to be in general conformity with the London Plan.

This requirement is a key factor in the Council's strategic approach to the location of development and growth and specific Draft Site Allocations within this consultation document.

The London Plan 2015 sets out the minimum housing target for the Borough of 641 per annum (10 year figure of 6413), provides forecasts for employment growth of 13.6 % increase between 2011 and 2036, and identifies the growing demand for school places and other social infrastructure.

The London Plan influences the spatial strategy for the Borough, identifying Bromley as restricted in terms of the loss of industrial land, with Strategic Industrial Locations, two potential Strategic Outer London Development Centres, at Biggin Hill and Crystal Palace, Bromley Town Centre an Opportunity Area, a network of town centres and regeneration areas.

Locations for Development

The requirement to be in conformity with the London Plan, in addition to the NPPF, guides the options the Council can consider for delivering the forecast growth over the plan period, and contributed to the earlier stages of the Local Plan preparation, the 'Options and Preferred Strategy' and 'Draft Policies and Designations' documents.

The Council has identified three strategic areas for economic growth at Biggin Hill, the Cray Business Corridor and Bromley Town Centre, while seeking to maintain employment opportunities across the borough, and access to services and facilities across the borough. The re-use of existing employment land and floorspace for business use is prioritised with modern and more efficient buildings.

Social infrastructure is required to meet the needs of local communities and therefore should be provided in accessible locations. Ensuring the provision of sufficient education sites to meet the need over the plan period has required an assessment of sites across the Borough.

New housing to meet the minimum 641 London Plan target should be provided in sustainable locations, close to existing facilities, and re-use brownfield sites. The London SHLAA supporting the 641 figure excluded t sites with open space designations. The provision of housing over the plan period will not be distributed evenly across the borough, with Bromley Town Centre already providing significant growth as part of the adopted Bromley Town Centre Area Action Plan, and a broad location within the housing trajectory in Years 11 - 15 in line with its Opportunity Area designation. The Borough has a substantial number of conservation areas and Areas of Special Residential Character which impact on the likely scale of development in these areas.

Green Belt and Open Space Designations

The preparation of the Local Plan, is the time that the Green Belt boundaries can, if there are exceptional circumstances, be amended. However, once amended they should be capable of enduring beyond the plan period.

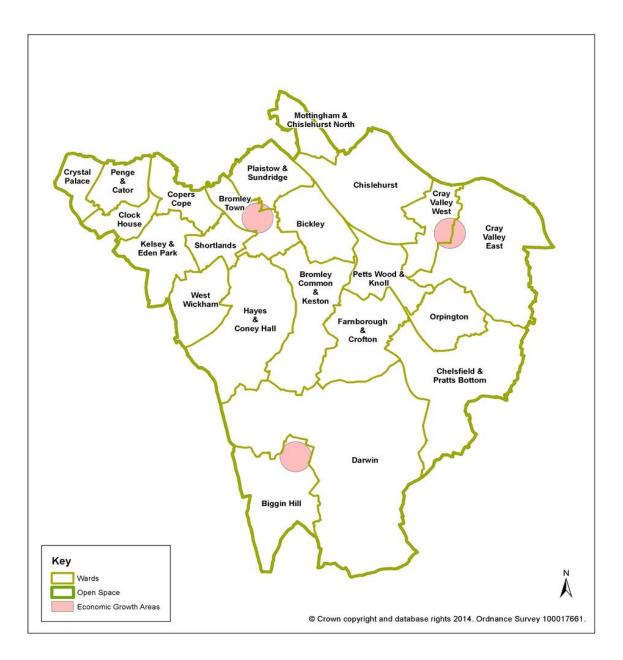
The Council is seeking to amend the Green Belt only where there are exceptional circumstances, and the amendment will help meet identified needs which it can demonstrate cannot be accommodated elsewhere.

The areas affected by proposed Green Belt and other open space designation changes are:

Biggin Hill Strategic Outer London Development Centre

New education sites within Green Belt,

Expansion of existing schools



Living in Bromley

Context

National Planning Policy Framework (NPPF, 2012) and National Planning Practice Guidance (NPPG, 2014)

NPPF Paragraph 17 sets out that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

The NPPF section 6 sets out national policy on the delivery of homes. In particular, NPPF paragraph 47 sets out what Local Planning Authorities should do to boost significantly the supply of housing. This includes needs assessments and identifying a supply of housing sites.

In terms of plan making local planning authorities should have a clear understanding of housing needs in their area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs and prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability, and the likely economic viability of land to meet the identified need for housing over the plan period. In terms of need the NPPG states that assessing need is the first stage in developing a Local Plan and once assessed a SHLAA should establish the likelihood of land being developable whilst taking into account any constraints such as Green Belt.

To assist in maintaining a five year supply of land for housing the Framework requires local planning authorities to look further into the future and to identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and where possible for years 11-15. Future housing will come from allocated sites and other sources including empty homes brought back into use and unplanned windfall sites and conversions. The allocation of 'large' sites is required though to give more certainty to the continued supply and demonstrate that the Local Plan is sound at Examination.

The NPPG specifies in paragraph 5 that where constraints have been identified the assessment should consider what action would need to be taken to remove them (including when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions may include investment in infrastructure, dealing with fragmented land ownership or reviewing a development plan policy that is constraining development. Paragraph 7 also advises that, where possible, local planning authorities should identify a supply of specific developable sites or broad location for year 11-15. Importantly, local plans can pass the test of soundness where LPAs have not been able to identify the latter.

London Plan (2015)

The London Plan sets many of the parameters for delivering sustainable housing development at London Borough level.

The London Plan para 3.14A and Policy 3.3 specifies that minimum housing supply targets for each borough are set out from 2015 until 2025. For Bromley this target is 641 dwellings per annum. These targets are informed by the GLA's Strategic Housing Market Assessment (SHMA) (2013) and London's housing land capacity as identified through the 2013 GLA Strategic Housing Land Availability Assessment (SHLAA). Consistent with the NPPF this approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development. Paragraph 3.17 sets out that on the supply side, the London SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (para. 47 NPPF) not least its central dictum that resultant development must be sustainable.

The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally (2007 practice guidance).

The London Plan (para 3.19A) observes that national policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their requirements with an additional buffer of 5% moved forward from later in the plan period. In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses and the London SHLAA's evidence, it must be recognised that in addressing this national objective, capacity which elsewhere in the country would be termed "windfall" must here form part of the 5 year supply.

The Inspector's report (Nov 2014) into the Further Alterations to the London Plan paragraph 21 specifies that "Once adopted, statute will require the local plans produced by London Boroughs to be in general conformity with the FALP. That includes conforming with a strategy which seeks to meet London's needs on brownfield land within the existing built up area. The SHLAA identifies most of the existing capacity and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London. Within the confines of the FALP's strategy there is little scope to do more." Paragraph 33 states "However, in order to be in general conformity with Table 3.1, Boroughs need only meet their individual targets".

LB Bromley's housing supply

At present sites that will help contribute to housing supply within the Borough over the next 15 years are included in the Bromley Town Centre Area Action Plan (2010) and the five year supply of deliverable land for housing (June 2015). Some of these sites were also included in the GLA's SHLAA 2013. A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7200 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum is estimated at approximately 1300 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units.

The Council contributed to the London-wide SHLAA / Housing Capacity Study (SHLAA, 2009). As a result of the Assessment an annual housing monitoring target of 500 units was allocated to the Borough in the 2011 London Plan for the plan period 2011/12 – 2020/21. The Council also contributed to the GLA's SHLAA 2013 which assigned an annual housing monitoring target of 641 units to the Borough and has been adopted through the 2015 London Plan (consolidated with alterations since 2011). The 2013 SHLAA shows that the basis for the increased target from 500 to 641 per annum for Bromley is comprised of small sites. The 2009 SHLAA attributed a small site capacity of 195 units per annum compared to 352 units within the 2013 SHLAA.

The Council updated the five year housing supply paper in June 2015 (previously published in September 2014) in response to the increased annual housing target in March 2015. The Paper sets out which sites and allowances are included within the supply and concludes that Bromley is able to meet its five year housing supply target.

A revised draft housing supply policy sets out an updated target figure for the Borough following the alteration of the London Plan (2015) as follows:

Housing Supply

The Council will make provision for a minimum of 641 additional homes per annum over the fifteen year Plan period which will be facilitated by:

- *i* The development of Proposal Sites;
- *ii.* Town centre renewal involving the provision of housing;
- iii. The development of housing within Renewal Areas where appropriate;
- iv. The development or redevelopment of windfall sites;
- v. The conversion of suitable properties;
- vi. Mixed use developments including housing in suitable locations;
- vii. The provision of suitable non self-contained units;
- viii. Vacant properties being brought back into use;
- ix. Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities.

Supporting text

London Plan Policy 3.3 provides a regional context for housing requirements and sets out borough figures for housing provision from 2015/16 – 2024/25 based on the findings of the GLA's 2013 London Strategic Housing Land Availability Assessment and the 2013 Strategic Housing Market Assessment (SHMA) and other analysis.

The Borough has an annual housing provision figure of 641 units per annum as set out in Table 3.1 of the London Plan to assist in meeting requirements across London. The 2013 SHLAA specifies provision of approximately 289 units per annum on large sites (0.25 ha+) and 352 units on small sites. The figure for housing provision will be rolled forward over a 15 year period in line with advice set out in the London Plan and the GLA's Housing Supplementary Planning Guidance (SPG) 2012.

Policy 3.3 of the London Plan specifies that boroughs should enable development capacity to be brought forward to meet targets whilst having regard to other policies in the Plan (i.e. development on brownfield land, intensification, town centre renewal, opportunity areas, mixed use, renewal of existing residential areas). New sites should be identified and existing sites reviewed to enable targets to be met.

A SHMA for the South-East London sub region was finalised in June 2014 and estimates an annual housing requirement across the sub region of 7200 units and a net annual need for 5000 affordable units. The net additional dwelling requirement for Bromley per annum is estimated at approximately 1300 units. Across the sub-region annual capacity targets identified within the 2013 SHLAA reach 7893 units.

Demonstrating an adequate supply for the Local Plan period

The results of the London-wide SHLAA (2013) provided the Borough with a minimum housing supply capacity figure of 641 units per year over a ten year period (2015/16 – 2024/25). A number of large sites included in the Council's housing trajectory also formed part of the GLA SHLAA (2013). To supplement the assessment it has been necessary to establish if there are additional sites that can add certainty to the

number of developable sites across the Plan period. Consequently evidence within the GLA's SHLAA will be supplemented with the Site Assessment 2015 based on the annual minimum target figure (included as a supporting document).

Site assessment methodology

The identification and assessment of land available for housing development has followed the methodology in the Planning Practice Guidance.

The main stages of the assessment are:

- Site identification
- Site assessment
- Identification of other sources of supply (windfall sites etc)
- Assessment review identification of need and production of a draft trajectory. (If there are not enough sites or locations, then further work will be required)
- Production of a final evidence base.

Site identification

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

Assessment

All sites put forward for housing development have been subject to an information gathering exercise including site visits and aerial photography where required. This has enabled an understanding of the physical characteristics of the sites, any constraints they may have, and any potential linkages with other sites.

These site surveys, along with any information submitted by landowners or their agents, have drawn together the following information:

- Site location, size and potential boundaries
- Current land uses and character
- Surrounding land uses and character
- Physical and environmental constraints including access, contamination, flood risk, infrastructure etc

- Heritage and landscape quality and assets
- Accessibility of the site and proximity to relevant facilities or infrastructure

As stated in the Planning Practice Guidance, the assessment should be guided by the development plan, emerging planning policy and national policy. The Draft Policies and Designations document (2014) set out possible future policies for the Local Plan and this has informed the policy framework for the sites alongside the London Plan and the NPPF. All current and potential policy designations have been noted for each site, for example:

- Open space and landscape Green Belt, Metropolitan Open Land, Urban Open Space
- Natural environment Tree Protection Orders, Sites of Special Scientific Interest, Sites of Importance for Nature Conservation
- Heritage, character and quality Conservation Areas, Listed Buildings
- Business and employment Business Areas and future business designations, shopping frontages and town centre locations

Assessment review

In order to establish which sites could provide the most sustainable solution to meeting future housing supply, they have been considered in the context of the current and future policy framework – particularly the draft housing supply policy set out above and the spatial strategy in the Draft Policies and Designations document 2014.

Spatial Strategy summary

- Bromley Town Centre focus for sustainable growth of retail, office, homes, leisure and cultural facilities
- Cray business corridor the main industrial and business area within the Borough
- Biggin Hill SOLDC a cluster of businesses focussed on aviation and high tech related industries
- Protect and enhance the quality and character of all Bromley's places
- Protect and enhance the Borough's varied open spaces and natural environment
- Improve Renewal Areas
- Maintain and enhance the network of town centres, local centres and neighbourhood parades

Using this strategy and policy framework, the following eight sites set out in the Housing Trajectory table have been identified for their potential to contribute to housing supply subject to any further work necessary on the individual sites:

Bromley North Station:

Allocate for mixed uses including residential, office, retail and transport interchange (approx. 250 units)

Bromley Civic Centre:

Allocate for mixed use development. Further work to be carried out to review Council accommodation needs and to determine how best the site can contribute additional residential units depending on its need for education purposes. (approx. 20 units)

Gas Holder station, Homesdale Road/ Liddon Road, Bickley:

Allocate for residential led mixed use development (approx. 60 units)

Bromley Valley Gymnastics Centre, Chipperfield Road:

Allocate both parts of the site for mixed use development including reprovision of library, community uses, gymnastics centre and new residential. (approx. 200 units)

Former milk distribution depot, Bruce Grove:

Allocate for residential and/ or employment (approx. 30 units)

Maybrey Works:

Allocate for residential led mixed use development (approx. 60 units)

Land adjacent to Bickley Station:

Allocate for residential development (approx. 30 units)

Bassetts Campus:

Allocate for residential development (approx. 100 units)

The result of the assessment of these and all other sites put forward for consideration as housing allocations can be viewed in the supporting document "Site Assessment 2015".

Housing Trajectory

The trajectory below sets out housing supply for the plan period. It is divided into 3 time periods covering the full 15 years of the Local Plan. In accordance with the NPPF the first five years represent the Five Year Housing Supply position (at the time of writing), years 6-10 demonstrate deliverable sites, and years 11-15 potentially developable sites and broad locations.

Housing trajectory table

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Bickley							
Gas Holder Site Homesdale Road/Liddon Road	CFS	Large	1	0	30	60	90
Land adjacent to Bickley Station	CFS	Large	0.9				
Biggin Hill							
49 Sunningvale Avenue	S	Large	0.26				
20-22 Main Road Biggin Hill TN16 3EB	Р	Large	0.4	18	0	0	18
Bromley Common and Keston							
Blue Circle Sports Ground Crown Lane Bromley BR2 9PQ	s	Large	12	155	0	0	155
Bromley Town							
Title House 33-35 Elmfield Road BR1 1LT	S	Small	0.19				
Archers Court 48 Masons Hill BR2 9LG	S	Small	0.2				
Babbacombe House Babbacombe Road BR1 3LW	s	Small	0.05				
Land at South Side of Ringers Road BR1 1HP	s	Large	0.27				
165 Masons Hill BR29HW	S106	Small	0.13	537	890	400	1827
Site B Tweedy Road/London Road	BAAP	Large	0.37				
Site C Town Hall	BAAP	Large	0.7				
Site F Bromley Civic Centre	BAAP	Large	5.75				
Site G West of High Street	BAAP	Large	3.2				
Site K Westmoreland Road Car Park of BAAP	s	Large	0.96				
Site P Sainsburys West Street	BAAP	Large	1.25				
Bromley North Station	CFS	Large	2.86				
Chislehurst							
Graham Chiesman House St Pauls Cray Road Chislehurst BR7 6QA	s	Large	0.9	42	0	0	42
Clock House							
County House 221-241 Beckenham Road BR3 4UF Land Adjacent Clock House	G	Small	0.12	85	0	0	85
Station UDP		Small	0.01				

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Copers Cope							
Dylon International Ltd Worsley Btidge Road SE26 5HD	Р	Large	0.28				
Dylon International Ltd Worsley Btidge Road SE26 5HD	S	Large	0.28				
57 Albemarle Road BR3 5HL	S106	Small	0.16	332	60	0	392
Land rear of 86-94 High Street BR3	s	Large	0.35				
125 Park Road BR3	S	Small	0.11				
Kent County Cricket Ground	S	Large	2.04				1
Maybrey Works	CFS	Large					
Cray Valley East							
76 High Street BR6 0JQ	S	Small	0.23	50	0	0	50
Cray Valley West							
Grays Farm Production Village	Р	Large	1.09				
Bromley Valley Gym Chipperfield Road St Mary Cray		Large	2.8	45	80	120	245
Crystal Palace							
Anerley School For Boys Versailles Road SE20 8AX	s	Large	0.7				
193 Anerley Road Penge	S	Small	0.13				
1 Chilham Way BR2 7PR	S	Large	0.78	48	60	120	228
The Haven Springfield Road	Р	Large	1.4				
Crystal Palace Park Crystal Palace Park Road SE20	Р	Large	80				
Farnborough and Crofton							
Bassetts House Broadwater Gardens BR6 7UZ	CFS	Large	2.5	0	100	0	100
Hayes and Coney Hall							
Fair Acres Estate Fair Acres	S	Small	0.01				
Isard House Glebe House Drive	Р	Large	0.57	54	0	0	54
Hayes Court West Common Road	Р	Large	2.6				
Kelsey and Eden Park							
Langley Court South Eden Park Road	Р	Large	10.6	195	0	0	195
The Rising Sun	Р	Large	0.18		•	-	
Orpington							
Depot Bruce Grove Orpington	CFS	Large	0.3				
Orpington Police Station The Walnuts BR6 0TW	Р	Small	0.2	162 30 0		192	
Berwick House 8-10 Knoll Rise BR6 0EL	G	Small	0.1				
Plaistow and Sundridge							
Sundridge Park Management Centre Ltd Plaistow Lane Bromley BR1 3JW	Р	Large	2.27	158	0	0	158

LB Bromley summary housing trajectory(indicative figures)	Status	Site size	Site Area (ha)	2015/16 - 19/20	2020/21- 24/25	2025/26 - 29/30	Totals 2015/16 – 2029/30
Sundridge Park Manor Willoughby Lane Bromley BR1 3FZ	PCO	Large	3				
Holy Trinity Convent School Plaistow Lane BR1 3LL	S	Large	0.95				
25 Scotts Road BR1 3QD	Р	Large	0.4				
Plaistow Lane Service Station Plaistow Lane	S	Small	0.1				
West Wickham							
Summit House Glebe Way BR4 0RJ	Р	Large	0.5	54	0	0	54
BROAD LOCATIONS (additional units within BTC, or identified through BTCAAP review, continued town centre/retail changing patterns and renewal areas)				0	150	750	900
Sites of 9+ units and broad locations total				1935	1400	1450	4785
Small sites projection (includes sites <9units commenced for first 5 years and projection)				1270	1760	1760	4790
Vacant units projection				100	100	100	300
Prior approval projection				190	60	0	250
Trajectory total				3,495	3,320	3,310	10125
GLA Target				3,205	3,205	3,205	9615
GLA target + 5% buffer				3,365	3,365	3,365	10095
Difference (between trajectory total and GLA target +5% buffer)				130	-45	-55	30

(P=planning permission granted, S=started, CFS=call for sites, G=prior approval granted, BAAP=Bromley town centre area action plan allocation, UDP=UDP proposal site, S106=awaiting S106 signing, PCO=pending consideration)

Summary of trajectory table

Subdivision of small and large sites set out above over Plan period				
Small sites	4790			
Large sites	4785			
Prior approval and Vacant units	550			
TOTAL	10125			

In accordance with paragraph 47 (bullet 4) of the NPPF the draft Local Plan will include information on the delivery of affordable and market housing across the plan period and how the Council intends to monitor and manage this delivery to ensure a five year supply of housing is maintained.

Traveller Sites

Context

The emerging Local Plan has set out, in past consultations, the Council's intention to address the accommodation needs of travellers, in line with the "Planning Policy for Traveller Sites" (PPTS), through the allocation of sites with current or historic permissions as Traveller sites. The assessment for traveller use, of sites which came forward in response to the Council's Call for Sites, confirms the lack of alternative sites for use by travellers and supports the "exceptional circumstances" for the Council's approach to making limited alterations to produce "insets within the Green Belt" for use "as a traveller site only.

A recent planning appeal for a Traveller Site (providing an additional two plots to the southern end of the existing permitted Travelling Showmen's Site), was recovered by the Secretary of State and temporary planning permission granted for a three year period (expiring 3rd December 2013). In light of that appeal decision, a further allocation for Travelling Showmen (increasing the extent of the previously proposed allocation by 2 plots) is now recommended. (Map 8 Appendix 1)

The maps in Appendix 1 illustrate this newly recommended allocation and set out the detailed boundaries of the previously proposed Traveller Sites.

The Government's Planning Policy for Traveller Sites (PPTS), relates to "Gypsies and Travellers" and "Travelling Show-people" under the single umbrella of "Travellers". It requires local planning authorities to produce a robust evidence base to establish traveller accommodation needs, in order to inform the preparation of local plans and planning decisions, and to annually update a supply of specific deliverable sites sufficient to provide five years a worth of sites and broad locations for growth for years 6-10, and where possible years 11-15.

In addition to establishing the appropriate level of pitch provision the guidance also requires Local Plans to address effective enforcement of planning policy. Addressing needs in accordance with the guidance will assist the Council in resisting future inappropriate development in the Green Belt. Previously the Council has lost appeal decisions due to the weight Planning Inspectors have given to the issue of identified need that has not been met.

Bromley is covered to a large extent by planning and landscape constraints, notably Open Space designations, including Green Belt and Metropolitan Open Land, along with a range of other protective designations. These designations and other strategic needs of the plan, notably the housing requirement, represent very significant challenges to identifying suitable locations for Traveller Sites.

All existing traveller sites, with or without permission, lie within the Green Belt and are by definition "inappropriate". Past studies, dating back to the 2003 GL Hearne "Bromley Gypsy Sites Study" have illustrated the difficulty, in practice, of finding sites other than within the Green Belt. The GL Hearne study concluded by suggesting that, subject to extensive consultation, allocations from within the Green Belt or Metropolitan Open Land (MOL) might be considered.

Throughout the development of the London Plan 2011 Bromley worked closely with the GLA in developing it's borough targets for Gypsies and Travellers and Travelling Showpeople, although the 2011 plan subsequently determined not to set borough targets.

Section 110 of the Localism Act 2011 places a 'Duty to Cooperate' on Local Planning Authorities when preparing development plan documents. The Duty requires constructive, active engagement on an on-going basis to support all activities relating to a strategic matter. This engagement has been on-going with neighbouring authorities, within and beyond London and is detailed in the evidence base, however, these discussions did not result in any expressions of interest or willingness from neighbouring authorities to support the provision of Bromley's identified need.

In line with the Planning Policy for Traveller Sites (PPTS) 2011 and the statutory duty to assess the accommodation needs of travellers under section 8 of the Housing Act 1985, Bromley first published it's "Gypsies and Travellers and Travelling Showpeople Accommodation Evidence Base Paper" in 2011. This evidence base has been updated with each subsequent Local Plan consultation and indicates the numbers of council and private sites and the extent of the current unmet need which substantially comprises long established families who have been living on private sites, by virtue of temporary permissions, granted on appeal. Temporary permissions due in part to the inability of the Council to demonstrate that the needs of travellers had been addressed.

The PPTS highlighted the Government aim to promote more private traveller site provision and crucially advised that, whilst the Green Belt should be protected from inappropriate development, in exceptional circumstances, limited alteration to the defined Green Belt boundary to accommodate a site inset within the Green Belt to meet a specific, identified need as "a traveller site only", could be undertaken through the plan-making process.

Local Plan consultations in March 2013 and February 2014, acknowledging the difficulties in finding appropriate traveller sites and the PPTS encouragement of private sites, consulted on addressing unmet need through allocating existing sites inset within the Green Belt for traveller use only.

The Local Plan draft traveller policy, consulted on in 2014, (set out in Appendix 2) makes clear that once the Local Plan is adopted the Council will seek to meet identified need for provision by first considering the potential within allocated Traveller Sites thus enabling it to resist future sites within the Green Belt. Since development for traveller pitches is "inappropriate" within the Green Belt other than "insets" specifically allocated "as a traveller sites only", the scope to meet the five year supply and future provision over the plan period is dependent upon the capacity within the allocated sites. (listed in Table 1 below),

Table 1TravellerSiteAllocations(PreviousConsultations)Detailed boundaries for consultation in Appendix 1

Traveller Site (Gypsies & Travellers)	Planning Status	Pitches
Star Lane	Planning Status	22
	LA (permission)	
Old Maidstone Road	LA (permission)	14
Land at 148 Croydon Road, Keston	Private (permission)	5
"Meadow View", Salt Box Hill, Biggin Hill	Private (permission)	3
	Private (expired	
	temporary permission -	
Land Adj 1 Vinsons Cottages,	application to be	
Hockenden Lane, Swanley	determined)	1
		1
	Private (expired	
	temporary permission -	
Southview, Trunks Alley, Hockenden	application to be	
Lane, Swanley	determined)	2
Mead Green, Layhams Road,	Private (expired	2
Millies View, Layhams Road,	temporary permissions -	2
	applications anticipated)	
St Joseph's Place Layhams Road,	3 adjacent sites	2
Traveller Sites (Travelling		Plots
Showpeople)		
Travelling Showpersons Yard,		
Layhams Road	Private Authorised	29

At the previous consultation stage (Draft Policies & Designations Feb 2014) two sites were the subject of outstanding planning appeals and not included - Land at junction of Sheepbarn Lane and Layhams Road for 2 Travelling Showmens Plots and a single Gypsy and Traveller pitch at Cudham Lane North ("Archies Stables").

The appeal which extends the existing Travelling Showpeoples Site by 2 plots, has since been granted temporary planning permission and was therefore subject to the full site assessment for Traveller sites. The second of the two appeal sites for a single Gypsy and Traveller pitch remains outstanding.

The detailed boundaries in Appendix 1 reflect those set out through previous and current planning permissions, with exception of the Council's site in Star Lane and private sites in Layhams Road. These boundaries have been recommended on the basis of the physical terrain and the desire to produce robust, defensible boundaries as indicated below.

• The Star Lane Traveller site has operated since the 1960s. For rental purposes there is a plan illustrating the individual pitches, however the boundary of the site itself had not been clearly defined. Several years ago works were undertaken to construct steep earth bunds, in the order of 20ft high, separating the traveller pitches from St Pauls Cray Hill Park. It is recommended that the traveller site boundary be defined to reflect the land

currently to the south of the earth bund, to support effective management / maintenance (See Map 1 Appendix 1)

• <u>Layhams Road Sites</u> ("Millies View", "St Joseph's Place", "Mead Green" and "Keston Mobile Park") As per the various appeal decisions it is recommended that the sites continue to be limited to the rear of the parcels of land, but that a unified, more defensible boundary be created (see Map 7 Appendix 1) to enable more effective monitoring and control of the sites.

Two previously assessed sites, King Henry's Drive, and "Chalk Pit", Old Maidstone Road, which were highlighted in the Options and Preferred Strategy consultation (2013) are no longer in traveller use or ownership and as such they were rejected at Tier 3 on grounds of deliverability and therefore no traveller Site inset boundaries are proposed.

Whilst the Local Plan will establish the boundaries of the Traveller Sites, any development within the sites, the siting of caravans, landscaping etc. remains subject to the full planning application process. The evidence base indicates that the boundaries allocated Travellers sites as illustrated can provide the five year supply and address the need for pitches over the plan, subject to the additional allocation for 2 showmen's plots detailed below, and the outcome of the outstanding appeal for a single gypsy traveller pitch.

Site Assessment methodology

Existing sites and those which came forward through the "Draft Policies & Designations" Call for Sites were subject to a site assessment reflecting the Planning Policy for Traveller Sites (PPTS) which requires local authorities to ensure that traveller sites are sustainable economically, socially and environmentally, specifically identifying the following as being important

- promoting co-existence between the site and the local community
- access to appropriate health services, regular education, welfare and employment infrastructure whilst avoiding undue pressure on local infrastructure and services
- due regard for the protection of local amenity and local environment
- consideration of the effect of local environmental quality (noise and air quality) on the health and wellbeing of travellers and the avoidance of locations in areas at high risk of flooding, including functional floodplains
- effectively using previously developed (brownfield), untidy or derelict land
- protecting the Green Belt from inappropriate development

The Site Assessment set out in detail in the Evidence Base involves a 3 Tier approach

<u>Tier 1 Location and Key Constraints</u> provides a high level sieving process. It identifies key aspects of a site's location, protective designations, the accessibility of key social infrastructure and its current or proposed use.

- Green Belt and Open Space Protection (excepting existing or historic traveller sites which benefit from current or historic permissions. These sites will progress through the assessment criteria the lack of alternatives may constitute exceptional circumstances to warrant their allocation).
- Relationship to other Areas of Constraint includes areas of protection (including historic, visual amenity and ecological designations) and hazard areas (including flooding, contaminated land and public safety zones)
- Proximity to Key Social Infrastructure defined as access to a doctors surgery or medical centre, a primary school, and a food shop.
- Land Utilisation Sites which are required to meet other objectives of the plan. Eg featuring in the 5 year housing supply paper

<u>Tier 2 Infrastructure</u> - Following completion of the Tier 1, sites that warrant further assessment were subject to Tier 2, which examines transport and site infrastructure.

- Transport Infrastructure minimising any impact on local amenity resulting from vehicle traffic, with an independent vehicular access point with access to nearby public transport node.
- Site Infrastructure Basic infrastructure (water, electricity). Assumed if a potential site / area is located within 500m of existing development

<u>Tier 3 Impact, Access & Deliverability</u> Having met the minimum requirements of Tiers 1 and 2, sites were assessed in terms of the impacts of the site on local character and appearance, impact on and from surrounding land uses, the contribution it could make, land ownership and necessary preparatory work / mitigation.

Site Assessment Results and Recommendations

In order to ensure that all alternatives sites have been thoroughly explored, the Traveller Site Assessment methodology, previously applied to existing traveller sites, in earlier stages of the Local Plan, has been applied to sites coming forward through the call for sites.

The full assessment tables for sites which came forward through the call for sites were used to undertake the Tier 1 sift. The vast majority of sites submitted, were subject to open space protection, in the main Green Belt. Of the remaining sites, whilst they were well located in respect of proximity to key social infrastructure all were dismissed for a range of reasons, notably hazard areas (flood risk, and contaminated land), and areas of constraint (historic, visual amenity and ecological designations. Several sites were sifted at tier 1 on grounds of efficient land utilisation, given their high PTAL ratings they are required to deliver other objectives of the Local Plan. Additionally, had such sites not been sifted at tier 1 there would be significant viability issues (tier 3) for acquisition, as low density Traveller sites in the context of other competing high value and strategically important high density uses.

In his determination of the recent planning appeal for Showpeoples plots at Sheepbarn Lane the Secretary of State agreed with the Inspector's assessment that there does not appear to be any reasonable alternative accommodation for the appellants. The site identified (Map x in Appendix 1) has been subject to the Traveller Site Assessment methodology, and given the need, accepted by the

Secretary of State and in the absence of alternative sites is additionally recommended for allocation as a Traveller Site the site

A further site, in Cudham Lane North, remains the subject of an outstanding appeal. Having initially been recovered by the Secretary of State, it's recovery was subsequently the subject of a Judicial Review and the case has been returned to the Planning Inspectorate for determination. As a Green Belt site currently without any current or historic planning permission, is sifted out at Tier 1. Any future assessment on this site will be considered in light of the outcome of that appeal decision.

5. Conclusions

The Bromley Gypsies and Travellers and Travelling Show-people evidence base addresses the requirement in planning guidance and the statutory duty under section 8 of the Housing Act 1985 to assess the accommodation needs of travellers.

The site assessment process confirms the lack of sites other than in the Green Belt, to meet the needs, supporting the Council approach previously consulted on to allocate existing traveller sites with current or historic permissions.

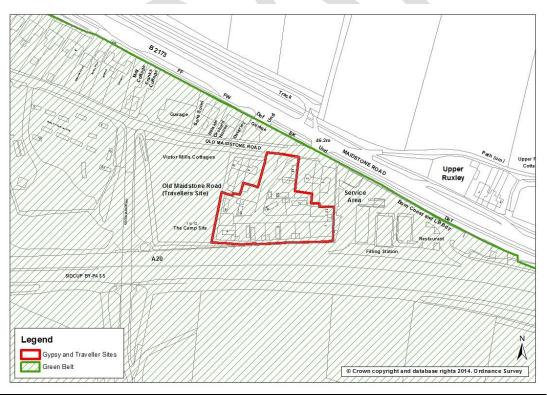
Following a recent appeal decision a further Traveller Site is recommended for allocation to provide an additional 2 Showmen's plots.

The proposed boundaries, indicated in the appendices, will enable the Council to meet the requirements of national guidance to demonstrate specific deliverable sites sufficient to provide five years a worth of sites and broad locations for the longer term.

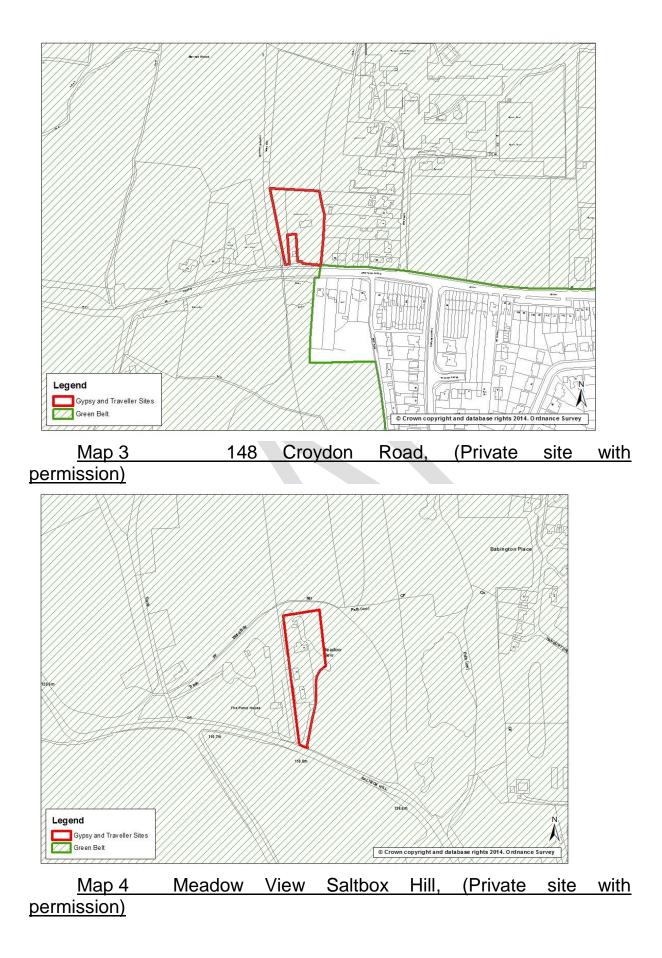
Appendix 1 Traveller Site Boundaries

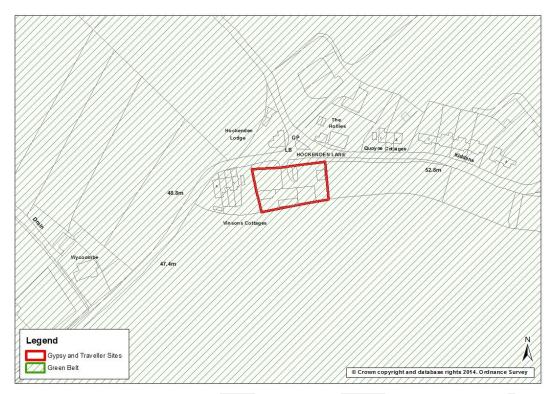


Map 1 Star Lane (Council Site)



Map 2 Old Maidstone Road (Council Site)

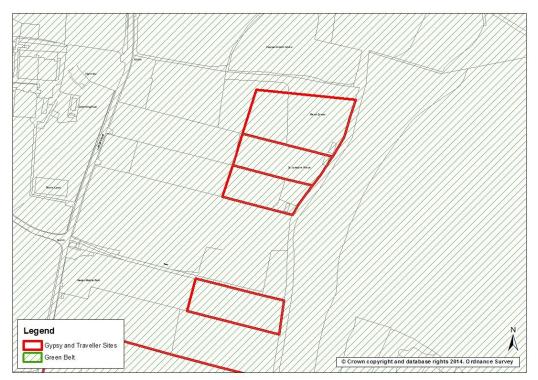




<u>Map 5 Adjacent to Vinsons Cottages, Hockenden Lane - (Private site</u> with expired temporary permission, application being considered)



<u>Map 6 Trunks Alley, Hockenden Lane - (Private site with expired</u> temporary permission, application being considered)



Map 7 Mead Green, St Joseph's Place, Millies View (adjacent sites) and Keston Mobile Park, Layhams Road (Private sites with expired permissions, new applications anticipated)



Map 8 Travelling Showmen's Site Layhams Road, (Private site with permission) indicating recommended extension to the south, at junction with Sheepbarn Lane (Private site with temporary permission)

Appendix 2

Draft Policies and Designations Document (February 2014)

Policy 5.12 Traveller's Accommodation

The Council will monitor and seek to address the accommodation needs of Travellers, including pitches for Gypsies and Travellers, and plots for Travelling Show-people, in partnership with representative groups and the wider sub region.

The Council will seek to meet the identified need for provision by first considering the potential within allocated Traveller sites. Proposals for new development within allocated traveller sites will need to be sensitively located and landscaped to minimise adverse impacts on the visual amenity of the site.

Proposals for new traveller sites to address an identified need for provision will be acceptable provided that:

- i the site lies outside any areas of constraint, complying with Green Belt and other open space policies, and
- ii. the site is well- related to schools, medical facilities, shops and public transport, and
- iii. there are no adverse effects on the residential amenity of neighbouring properties and the local environment, and
- iv. there are no adverse impacts on the health and wellbeing of travellers related to local environmental quality (such as noise and air quality).
 Sites in areas at high risk of flooding, including functional floodplains, will generally be resisted given the particular vulnerability of caravans.

With regard to the need for transit pitches the Council will work with the sub-region to secure their provision in an appropriate location within the sub-region.

Site name: Maybrey Works, Worsley Bridge Road

Summary:	Site not recommended for allocation
Address:	Maybrey Works, Worsley Bridge Road, Lower Sydenham SE26 5AZ
Ward:	Copers Cope
Current use:	Electricity substation, pool river transformer, pumping station, light industrial units and storage space
Potential use:	Residential led mixed use development. Subject to other uses and flood risk constraints, London Plan suburban/ urban residential density, around 60 units.
Site description:	The site is approximately 0.6 ha in size, currently occupied by industrial buildings and is bounded by open playing fields to the south and east, by the former "Dylon" site to the west, Worsley Bridge Road to the north with terraced and flatted residential to opposite. The Dylon site has been granted planning permission for a residential mixed use scheme, the Maybrey site remains the only land east of the railway line in industrial use. West of the railway lies the bulk of the Lower Sydenham Business area which is characterised by large warehouses used for general industrial uses.

	Criteria
Open space and	There is no designated open space on site
natural environment	The Site includes a site of importance for nature conservation on its eastern
	boundary along the river Poole.
Flood risk and	The site is in flood zone 2 and 3
drainage	The site is in an area of groundwater/ surface water flood risk
Pollution	The site is in an air quality management area
	There are nearby noise emitting sources which may be incompatible with the proposed development including the combination of traffic on the railway and from industrial activities in the Lower Sydenham Business Area across the railway to the west.
	The site may contain contaminated land
Heritage,	The Site is adjacent to the former "Dylon International" Locally Listed Building sited
Character and	on the adjacent site however permission for redevelopment has been granted
landscape	The site is not in a Conservation Area or ASRC
	Development could affect local views, the skyline or landmarks depending on its
	scale and design: There is a view of Local Importance across the site. The site
	adjoins Metropolitan Open Land.
Accessibility and	Nearest shopping centre - 1.8 km Beckenham District Centre
community facilities	Nearest GP - 1 km Sydenham Green Health Centre
	Nearest shopping parade - 430 m - Southend Lane Parade (Lewisham) -Nearest primary school Site - 891m Worsley Bridge Primary Or Heseltine Primary School
	(Greenwich)- 629m Heseltine Primary School
	Nearest secondary school -659m Sedgehill secondary school
	Nearest leisure centre - 2.4 km The Spa, Beckenham Nearest cinema - 2.6 km away Odeon Cinema, Beckenham
	Nearest library - 2.4 km Beckenham Library
	Nearest park - 1.8 km Cator Local Park
	Development of the site would not result in the loss of a community facility
Transport and	Public Transport Accessibility Level 2 (low). The site is within 400m walk of a bus
infrastructure	stop with one all-day service going to Bromley via West Wickham and
	Beckenham
	Site is 200 metres from Lower Sydenham Train Station
	The site although in a low PTAL location has good bus services and is within close
	walking distance to the Lower Sydenham train station with very convenient
	commuter links to London.
	Access to the site would be improved by infrastructure works
	There is an Electricity Substation, a Poole River Transformer and the Worsley Bridge Pumping Station- Those facilities need to be retained on the site and

	integrated within any development proposal.
Business and employment	The site is located in the Lower Sydenham Business Area (this is proposed to become a Locally Significant Industrial Site in the Local Plan). It is proposed that the Maybrey site does not form part of the LSIS. The site is not in any town or local centre or shopping frontage and could help improve the vitality of the area
Deliverability	The site is in single ownership. Phasing and deliverability information for this site has not been provided however it is considered that the site has potential to be developed within years 6-10 of the housing trajectory.
Recommendation	Not recommended for allocation. Retain in business use.

Additional information

The status of the eastern section of the Lower Sydenham Business Area (proposed as an LSIS) has been reviewed along with other business and employment land designations. Details are set out in the Local Plan Industrial Land Update 2015.

