

**TRAVIS PERKINS
(PROPERTIES) LIMITED**

**PROPOSED SUBMISSION DRAFT
BROMLEY LOCAL PLAN**

HEARING STATEMENT

**REFERENCE DLP63_1
CONCERNING DRAFT POLICY 1,
SITE 4**

NOVEMBER 2017

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**TRAVIS PERKINS
(PROPERTIES) LIMITED**

**PROPOSED SUBMISSION DRAFT
BROMLEY LOCAL PLAN**

**HEARING STATEMENT
REFERENCE DLP63_2
CONCERNING DRAFT POLICY 81**

NOVEMBER 2017

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APPENDICES

1.0 INTRODUCTION

- 1.1 On 23 December 2016 we submitted representations in relation to the above plan, on behalf of Travis Perkins (Properties) Limited (“TP”). One of the representations made, subsequently, was subsequently referenced DLP63_2 and concerned draft Policy 81. The representations sought modifications to the second paragraph of the policy as follows.

~~Notwithstanding the above uses, On sites in the SIL where non Class B operations are already in existence **or are permitted**, proposals should seek to provide Class B operations **are encouraged**. Proposals involving non Class B uses on these sites should provide employment generating uses that reinforce the role of the SIL. Proposals **for main town centre uses should also accord with draft Policy 91**. involving a quantum of floorspace to be used for display and sales should demonstrate that those uses are clearly ancillary to a primary Class B use.~~

- 1.2 Therefore the paragraph would read:-

On sites in the SIL where non Class B operations are already in existence or are permitted, Class B operations are encouraged. Proposals involving non Class B uses on these sites should provide employment generating uses that reinforce the role of the SIL. Proposals for main town centre uses should also accord with draft Policy 91.

- 1.3 This Statement responds to Questions 50 and 51 of Issue 11, “are the policies for employment in Bromley justified, consistent with national policy and will they be effective, based upon the Inspector’s Matters, Issues and Questions”.
- 1.4 Question 50 asks whether the plan provide for the positive planning of employment growth and an adequate analysis of employment floorspace needs in the Borough?
- 1.5 The first part of question 51 asks whether the evidence base sound and the wording of policy 81 sufficiently precise to define the SIL and the uses allowed within it, including a limited amount of ancillary retail use?
- 1.6 As background to this Statement, TP has lodged an appeal against the Council’s decision to refuse planning permission for the change of use of part of an existing industrial/warehouse building in Orpington. The property is within the Cray Business Corridor SIL. Permission has previously been granted for the change of use of part of it to Sui Generis Travis Perkins builder’s merchants. The appeal proposal seeks the change of use of the same area to a hybrid B8/A1 use for Wickes. The Sui Generis builder’s merchants would serve trade customers and facilities 26 jobs on the site as a whole. Wickes would serve both trade and retail customers and would provide 38 jobs on the site as a whole.
- 1.7 References to the content of the evidence base in Chapter 4 below, for Bromley are based upon the evidence of Grant Mills Wood in relation to that appeal.

2.0 LOCAL PLAN POLICY

Policy 80

- 2.1 The prelude to Policy 81 is Policy 80, Strategic Economic Growth, which identifies three strategic priority areas for economic growth:
- a) Bromley Town Centre;
 - b) Cray Business Corridor; and
 - c) Biggin Hill Strategic Outer London Development Centre.
- 2.2 The policy identifies three matters of focus, the first of which is bringing forward adequate development capacity.
- 2.3 Paragraphs 6.1.9 and 6.1.10 refer to the need to work with businesses to ensure the supply of quality employment floorspace, to the NPPF's approach to building a strong, competitive economy, and the commitment to securing economic growth in order to create jobs and prosperity, as well as to the GLA trajectory and to the evidence base.
- 2.4 Policy 80 therefore principally concerns economic growth, employment and prosperity from businesses. It is not restricted to Class B uses. We consider that Policy 80 provides for positive planning of employment growth in relation to question 50.
- 2.5 Subsequent policies (81-111) deal with specific types of economic development uses, and specific types of locations; industrial uses and locations, office uses and areas, homeworking, hotels, telecommunications, town centres and town centre uses, Biggin Hill Strategic Outer London Development Centre as well as Crystal Palace Strategic Outer London Development Centre.

Working with Businesses

- 2.6 TP considers that not all employment activities fit neatly within the above types of economic development uses. Its builder's merchants (sui generis uses) are one example; its Wickes branches (mixed B8/A1 uses¹) are another. These are economic development uses that can generate significant levels of employment and serve other business in the local area. The Plan should ensure that Bromley works with such businesses to ensure the supply of quality employment floorspace. Policy 80 accords with Paragraphs 6.1.9 and 6.1.10 above.

Policy 81

- 2.7 TP's representation, and this Statement, concern draft Policy 81 – Strategic Industrial Locations (SIL's). It states that B1b, B1c, B2 and B8 uses will be permitted and safeguarded in SIL's. Notwithstanding the policy goes on to state:-

¹ This classification has been accepted at appeal, and by Bromley Council.

“where non Class B operations are already in existence, proposals should seek to provide Class B operations”.

“Proposals involving non Class B uses on these sites should provide employment generating uses that reinforce the role of the SIL”.

“Proposals involving a quantum of floorspace to be used for display and sales should demonstrate that those uses are clearly ancillary to a primary Class B use”.

- 2.8 We consider these requirements below in terms of the NPPF, GLA forecasts and the evidence base.

NPPF²

- 2.9 The NPPF confirms that Government is committed to securing economic growth in order to create jobs and prosperity. The planning system must do everything it can to support sustainable economic growth, encouraging and not impeding it. Significant weight should be placed on the need to support economic growth through the planning system, and LPA's should proactively plan to meet the development needs of business and support an economy.
- 2.10 Local Plans should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth to meet anticipated needs over the plan period. The Plan should support existing business sectors, taking account of whether they are expanding or contracting. Policies should be flexible enough to respond to changes in economic circumstances.
- 2.11 Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

² paragraphs 18-22

3.0 GLA FORECASTS

The London Plan

- 3.1 The adopted London Plan includes evidence on forecast household and employment growth. The strategy is for managed growth, without encroaching on the Green Belt or unacceptable environmental impacts.
- 3.2 The GLA forecasts that the number of households will grow during the period 2015-2025, when c.424,000 new homes are required. On average, this equates to 12,470 dwellings/borough³ but it is half this level in Bromley (6,413 homes).
- 3.3 Additional households require additional jobs. London Plan Table 1.1 states that 861,000 additional jobs will be required in London (2011-2036) – an average of 25,234 jobs/borough. Growth in Bromley for the same period is lower at 16,000 additional jobs.
- 3.4 This overall growth is across all business sectors, and masks changes in particular sectors.
- 3.5 Growth is forecast in professional, real estate, scientific and technical activities, administrative and support service, information and communications, accommodation and food, health and education, “*other services*” as well as arts and entertainment.
- 3.6 By contrast “*Manufacturing is projected to continue to decline, from 129,000 jobs in 2011 to 34,000 by 2036*”. Sectors such as transport and storage, as well as wholesale, are also likely to decline.
- 3.7 Therefore, there will be employment growth across London to 2036, but this will be relatively low in Bromley, and manufacturing is forecast to decline.

³ Across the 34 boroughs

4.0 EVIDENCE BASE

Industrial Land Demand and Release Benchmarks in London 2011

- 4.1 This report for the GLA⁴ provides evidence to ensure that London has the right quantity and quality of industrial land to support its economy and its population, while using the land efficiently, at a metropolitan and local level. It confirms the structural change in the London economy shifting employment away from traditional manufacturing industries and into the service sector. Over the period 1998-2008, London's employment in industrial production has declined by 35%, a loss of nearly 100,000 jobs.
- 4.2 This report confirms a future decline in the "*general industrial*" and recommended the release of 732.7ha of industrial land across London from 2011 to 2031. This includes the release of 114.1 ha of industrial land in the south London sub region.⁵
- 4.3 Whilst this study is a little historic it has correctly identified trends in falling demand for industrial property.

The London Industrial Land Demand Study 2017

- 4.4 This Study is the latest report to assess the range of uses that occupy industrial land in London. It found that London's industrial floorspace stock has fallen by around 5 million sqm (19%), from c.25.8m sqm in 2001 to c.20.8m sqm in 2016. Five Boroughs did not follow this trend, including Bromley where the Industrial floorspace supply grew by 14,300 sqm.⁶
- 4.5 The report projects a further reduction in demand for industrial floorspace of 1.05m sqm for the period 2016-41, although Bromley is set to have an increase of 17,200 sqm⁷. In land terms, this amounts to a reduction of 166.5ha across London, with a growth of 1.4ha in Bromley.
- 4.6 Therefore, in the context of the London Plans forecast London wide decline in manufacturing, and relatively low employment growth in Bromley, the industrial land studies forecasts a modest growth in industrial land and floorspace in Bromley.

Economic Development & Employment Land Study 2010

- 4.7 One of the main objectives of the report was to identify future employment land requirements in Bromley between 2006 and 2026. Requirements were assessed based on economic growth forecasts, allowances for "*churn*" the loss of some sites. Three scenarios were considered:
1. No change in the economic climate within Bromley.
 2. High growth aspirations.

⁴ Roger Tym & Partners and Jones Lang LaSalle

⁵ Bromley, Lewisham, Sutton, Richmond-upon Thames, Wandsworth, Merton, Croydon and Kingston-upon Thames

⁶ The report also found that Bromley's warehousing stock increased by 8,333sqm between 2008 and 2015.

⁷ Demand for warehousing is expected to grow across the capital between 2016 and 2041, but focused in clusters such as Brent and Hounslow.

3. Improved performance scenario based upon maintaining the economic climate within Bromley, but with increased employment generation and reduced out-commuting.
- 4.8 In light of the data in the London Plan and abovementioned GLA reports, Scenario 1 is the most likely. Table 8 shows the economic aspirations that apply to each scenario. Excluding offices, this shows a 2,018sqm growth in “*other business*” and a significant decline of 60,616sqm in warehousing for the period to 2026.

Updated Employment Land Review 2012⁸

- 4.9 Chapter 14 of this report updates GVA 2010 Study of future employment land requirements. It identifies a need for 121,100sqm (net) between 2006-2031. With 10% added for choice and flexibility, this creates a total requirement of 133,200sqm between 2006 and 2031. This is more in line with GVA’s Scenario 1, than either scenario 2 or 3. DTZ forecast a requirement for 85,000sqm for Industrial (B1c & B2) and -6,900sqm for warehousing.
- 4.10 We conclude that there is a need for additional industrial and warehousing floorspace in Bromley, but that this need is relatively modest and should be accommodated within the locations set out in paragraph 2.1 above.

⁸ DTZ’s Retail, Office, Industry and Leisure Study

5.0 CONCLUSIONS

- 5.1 Policy 80 plans positively for employment growth based upon general economic growth and not simply Class B uses. However, it is important for subsequent policies concerning Working in Bromley to continue with this approach.
- 5.2 The policy requirement to protect industrial land in SILs via Policy 81 is understood, but this will harm economic growth if it is too rigid. As noted in paragraph 2.6 above, businesses do not always fit neatly into economic or planning classifications. The Council accepts in Policy 81 that where there are existing non B uses in SIL locations, that reuse or redevelopment for other non-Class B uses will be acceptable. The same flexibility should be afforded to sites which have permission for non-Class B uses. In the case of TP in Orpington (as summarised in paragraph 1.6 above), this will ensure that a more intensive use is provided serving not only trade businesses (for which permission already exists) but also retail customers. There will be no loss of the permitted function but a dual use with added benefit to customers. This will result in the provision of 12 additional jobs, in accordance with Policy 80.
- 5.3 Such an approach will promote economic growth, to create jobs and, proactively meeting the development needs of business and supporting the economy, in accordance with the NPPF. However, for the most part (sites in SILs other than those not in (or permitted) to have a non Class B use) the general policy protection will remain.
- 5.4 Indeed, this accords with the contents of the London Plan which forecasts a continued contraction in traditional industrial employment, and with the evidence base which shows the need for a balanced provision of employment land – and not requirements for significant additional new floorspace.
- 5.5 We therefore consider that subject to the proposed changes the Plan Policies will relate to the need to work with businesses to ensure the supply of quality employment floorspace, to the NPPF's approach to building a strong, competitive economy, and the commitment to securing economic growth in order to create jobs and prosperity, as well as to the GLA trajectory and to the evidence base. This accords with the objectives of paragraphs 6.1.9 and 6.1.10 of the Plan. It should define the SIL, the uses allowed within it, including a limited amount of ancillary retail use, whilst retaining sufficient industrial land.

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APPENDICES

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| 1.0 | Email from JPP |
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1.0 INTRODUCTION

1.1 On 23 December 2016, Montagu Evans submitted representations in relation to the above plan, on behalf of Travis Perkins (Properties) Limited ("TP"). One of the representations made, subsequently referenced DLP63_1 concerned draft Policy 1, Housing Supply, and specifically Site 4 – the Gas Holder Site. The representations supported the principle of a mixed use development, in line with the draft allocation, but objected to it in two respects:-

- 1) TP sought the deletion of the requirement for 60 units within the policy, as it was not clear that this could be achieved.
- 2) Clarification was sought on the wording of the requirement for remediation of the site contamination.

1.2 During 2017 TP has progressed its proposals for the Site, including holding a pre-application meeting with officers on 3 October. Arising from this, we are instructed by TP to prepare this Hearing Statement to update and clarify the position of the company in respect of Policy 1. This Statement responds to Question 20 of Issue 5, "*Are the sites identified for housing supply deliverable and developable*" based upon the Inspector's Matters, Issues and Questions.

2.0 LOCAL PLAN POLICY 1

- 2.1 Policy 1, Housing Supply, requires the Council to make provision for a minimum average of **641** additional homes per annum over the ten, and possibly fifteen, year plan period. It aims to achieve this in ten ways, listed as criteria a-j in the policy. Criterion (a) states that the development of allocated sites and sites with planning permission will be one way in which the required housing supply is achieved.
- 2.2 The policy then goes on to identify thirteen sites that are allocated to include residential development, as outlined in Appendix 10.2 of the Plan. The fourth site listed is the Gas Holder site on Homesdale Road.
- 2.3 Appendix 10.2 contains a plan of each site, with the boundary edged red, and a table with basis information in relation to that site. Site 4 is the Gas Holder site, although the red line only includes the western part of the site and its northern boundary to Liddon Road. The eastern part of the Site and boundary to Homesdale Road is excluded from the site definition.
- 2.4 The table beneath the plan confirms that the gas holders are no longer in use, that development is expected in Plan Years 6-10 and that redevelopment should:-
- Be for mixed use;
 - Include 60 residential units;
 - An unspecified amount of employment floorspace;
 - Ensure complete remediation of contaminated land; and
 - Mitigate flood risk (the northern part of the site is in flood zone 2).
- 2.5 We refer to this proposal below as “the proposed 60 Unit Allocation”. The successful delivery of the requirements of Policy 1 to deliver 641 units p.a. is based in part on the realism of allocations such as for the Gas Holder site.
- 2.6 In light of the pre-application advice of the Council, and further work undertaken by TP since December 2016, this Statement updates and clarifies TP’s position in relation to the emerging Local Plan in respect of the proposed 60 Unit Allocation and Policy 1.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 TP has developed an approach to mixed use development in London, which it has successfully undertaken at St Pancras and Battersea. This incorporates a builder's merchant at ground floor which is enclosed with a deck above it. Residential uses can then be constructed on the deck. The format is expensive to deliver and therefore requires a critical mass of development to make it viable. However, the format does make good use of urban land to meet needs for economic development and residential requirements.
- 3.2 TP wished to undertake such a scheme at the Gas Holder site. The approach particularly suited the circumstances of the site, where the land is contaminated. Notwithstanding the principle of "the polluter pays" in reality the land owner will not undertake more than a rudimentary remediation exercise. Accordingly, clean-up costs need to be borne by the development.
- 3.3 The technical requirements to remediate such sites are much more onerous, and therefore more expensive, for residential use than for commercial development. The provision of a builders merchant/ trade units, as a commercial use at ground floor, with residential on a deck above, would therefore reduce remediation requirements and costs and make the scheme more affordable.
- 3.4 TP's pre-application submission to LB Bromley of 8 August 2017 therefore proposed a builders merchant with trade units, accessed from a new access east of Tesco's vehicular entrance/ egress. These commercial uses were to be enclosed with 120 apartments above. As the site has a PTAL 2 rating, full car parking provision is required for the residential – which equates to 149 spaces. These were to be accessed from Liddon Road. The rationale for the accesses, parking etc was set out in a note prepared by transport consultants. This is referred to below as "the 120 Unit Scheme".
- 3.5 At the pre-application meeting on 3 October, we were advised by planning officers that the Borough Engineer would object to the 120 Unit Scheme because he did not consider that Liddon Road had the capacity to provide a safe access for such a volume of vehicles.
- 3.6 It was noted that the Site 4, Policy 1, allocation relies on Liddon Road to serve 60 dwellings and officers were questioned about the investigations that support the ability of Liddon Road to support a further 60 units. Whilst we were promised a response on this from Officers by the end of October, no response has been received in the six weeks since the meeting. Accordingly, TP sought a second opinion from JPP engineers. Its advice, contained in the email at Appendix 1, supports to views of the Borough Engineer as reported on 3 October in relation to the 120 units,
- 3.7 JPP also conclude that we cannot rely on the roads supporting 60 dwellings, which ties in with the failure of the Council to produce any justification for such a site capacity over the last 6 weeks.

- 3.8 TP therefore concludes that Liddon Road does not have the capacity to support 60 new dwellings. The limited infill of 7 new dwellings along the Liddon Road frontage is, however, more realistic in terms of transport capacity.
- 3.9 Therefore, for transport reasons alone, we consider that it is unsafe to rely upon the ability of Site 4 to deliver 60 dwellings.
- 3.10 Whilst we have not received written pre-application advice from Bromley since 3 October, at the meeting Officers advised that the scale and massing of the 120 Unit Scheme was too great for the site. Whilst the scale of the scheme could have been reviewed in the same format, the costs of constructing a deck over the commercial uses would become disproportionately high for fewer dwellings and so that option was not pursued.
- 3.11 Accordingly, TP considered the potential for a scheme based upon 60 dwellings on the eastern part of the site, accessed from Liddon Road, and commercial to the east accessed from Homesdale Road. This would still be a mixed use development, but the two uses would adjoin one another rather than the housing being above the commercial. This would require more onerous remediation of the western part of the site to residential standards. BNP Paribas advised TP that such a scheme would not be viable. As noted above, JPP has advised that such a scheme is also unlikely to be acceptable in transport terms.
- 3.12 Therefore, TP now proposes a simple residential infill of 7 units along Liddon Road, and the redevelopment of the rest of the Site for builder's merchants and trade units. Two storey residential units will front onto Liddon Road, with on street car parking, reflecting the character of much of the street. The traffic generation, around one tenth of that likely for the Proposed 60 Unit Allocation, is considered by JPP to be acceptable. TP's builder's merchants and trade units will be accessed from Homesdale Road which should also be suitable for the type of development envisaged.

4.0 CONCLUSIONS

4.1 Policy 1 requires the Council to make provision for a minimum average of 641 additional homes per annum for at least ten years based, in part, upon allocations of the Plan. The Gas Holder site is one of 13 allocated sites based upon the following requirements:-

- Mixed use;
- Include 60 residential units;
- An unspecified amount of employment floorspace;
- Ensure complete remediation of contaminated land; and
- Mitigate flood risk.

4.2 In accordance with the representations of 23 December 2016, TP continues to believe that the site can be developed for mixed use purposes, but that as it is not clear that 60 units can be achieved on the site, this figure should be deleted. Work undertaken since those representations, including verbal pre-application advice from the Council, indicates that around 6 or 7 units is more realistic.

4.3 The inclusion of employment floorspace at the site continues to be supported by TP.

4.4 Employment uses would not require the complete remediation of the site but rather the appropriate remediation of contaminated land. It is inappropriate and unnecessary to for the Plan to require complete remediation of it.

4.5 However, part of the site is located in flood zone 2 and any redevelopment of it will need to mitigate flood risk.

Appendix 1
Email from JPP

Subject:

FW: 13104 / 9.00: Homesdale Road, Bromley - Gas governors / Feasibility 027

Jonathan

As requested we have reviewed the access arrangements for land located between Liddon Road and Homesdale Road.

Liddon Road has a carriageway width of approximately 7.4m and is bound, for the majority of its length, by parking bays on both sides of the road providing an effective carriageway width of approximately 4.4m. Liddon Road serves a number of residential dwellings, commercial premises and the car park for Bickley Primary School. (We understand that there will be another school adjoining the existing, and that some of the commercial floorspace may be converted to use as residential). A carriageway width of 4.4m is below the normal width requirement of 4.8m to 5.5m for a standard residential road. Whilst a road width of 4.1m can be appropriate for two cars to pass based on Manual for Streets standards, this is a straight and traditionally designed street with housing and parking on both sides. Accordingly, it will feel narrow, and potentially unsafe, to most users who will seek a passing place.

We have looked at three scenarios:-

- TP's multi-level mixed use scheme incorporating 120 apartments (above a builders merchants) with the residential uses accessed from Liddon Road (subject of the pre-application meeting);
- The Council's draft local plan allocation for 60 houses accessed from Liddon Road; and
- TP's latest scheme with 7 houses along Liddon Road and a builder merchants.

Given the effective width restrictions on Liddon Road we would advise that Liddon Road has limited potential to support large scale residential development. Accordingly, we share the views of the Borough Engineer that Liddon Road cannot support a scheme of 120 apartments in transport terms. Indeed, we do not consider that it is realistic to rely upon this road being able to serve 60 houses as envisaged in the draft local plan. Accordingly, we consider that a small scale limited development is most appropriate due to the limited effective width of Liddon Road. The proposed development comprising 7 dwellings with on street parking off Liddon Road is the scale of development that we consider to be appropriate for the nature and width of Liddon Road. Arising from this, the use of the rest of the site will need to be accessed from Homesdale Road. (I note that the ground floor commercial uses of TP's pre-application scheme was also be assessed from Homesdale Road. Indeed, the extent of the Council's draft allocation means that the eastern part of the site will also need to be accessed from Homesdale Road too.

Homesdale Road (B265) is a classified road of a higher standard than Liddon Road. Homesdale Road has a carriageway width of approximately 6.8m and is bound by footways on both sides of the carriageway. It is proposed to serve a builders merchants with related trade units from an access off Homesdale Road. Homesdale Road is considered appropriate to serve a development of this nature and scale. Furthermore, there really is only one possible location for an access to the site which is immediately east of the Tesco access. Whilst the proximity of the two access positions is not ideal, there really is no other suitable location. Furthermore, traffic generation to a builders merchants and trade units is relatively limited, and so the nature of the proposed uses is also helpful. Therefore, we consider the proposed access location to be safe and appropriate for the reuse of the bulk of the former gas holder site (excluding the 7 houses on Liddon Road) for a builders merchants and trade uses.

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