

Orpington Field Club

Text from Email dated 14th November 2017

Re: Examination of Bromley Local Plan.

Representations on Draft Policy H1 Housing Supply concerning Green Belt sites to the east of Thornet Wood Road, Bickley.

DLP No. 65_1, Charles Mills, Daniel Watney for Fairworth Gospel Halls Trust; and

DLP No 87_2, John Escott, Robinson Escott Planning on behalf of Mr P Antill

Orpington Field Club (DLP rep. no. 184) would be very grateful if the following could be passed on to the Inspector, Elizabeth Hill.

The Orpington Field Club wishes to comment on DLP numbers 65_1 and 87_2 which propose the removal of sites east of Thornet Wood Road, Bickley from the Green Belt so that they can be used as alternative housing sites. Orpington Field Club members would like to point out that these sites are adjacent to a Site of Importance for Nature Conservation (SINC) of Metropolitan Importance which includes the adjacent Jubilee Country Park Local Nature Reserve. The area immediately to the south of the representation sites includes Blackbrook Wood which is semi-natural ancient woodland and lowland meadows which appear similar to those within Jubilee Country Park LNR, both Priority Habitats listed in Section 41 of the NERC Act 2006. The biodiversity of these sites helps to fulfil LBB's biodiversity duty as outlined in the NERC Act.

We feel that if these sites are omitted from the Green Belt and made available for development then the adjacent SINC and LNR will be put seriously at risk. If the representation sites were developed it is likely that the site immediately to the south would also come under threat of development some time in the

future. This would be a challenge to the SINC and LNR and would be detrimental to the openness of Jubilee Country Park. The representation sites enhance the nature conservation value of Jubilee Country Park Local Nature Reserve through increasing the size of habitat areas thereby increasing resilience to climate change as recommended in London Plan Policy 7.19, supporting text 7.60. The London Plan also states, under Planning Conditions Section D, '*Planning decisions should*' (point b), '*give strong protection to sites of metropolitan importance for nature conservation (SMIs). These are sites jointly identified by the Mayor and boroughs as having strategic nature conservation importance*'.

Orpington Field Club members therefore strongly support the London Borough of Bromley in retaining sites east of Thornet Wood Road, Bickley within the Green Belt.

Thank you for your attention in this matter.

Dr Judith John, Conservation Officer Orpington Field Club

PS RE: SD18d Proposed Submission Draft Local Plan Consultation 2016 – Summary of Responses 2017 Part 3. I noted a small mistake when reading Section 5.3 Nature Conservation and Development. Draft Policy 70, DLP59_45 Under Minor modification, '*Bromley Biodiversity Action Plan*' should read '*Bromley Biodiversity Plan*'.