

BEXLEY LOCAL PLAN EXAMINATION

Inspectors:

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Dear Mr Salom

Local Plan Examination

We would like to thank the Council, and all other participants, for their helpful contributions to the examination hearing sessions and for preparing the specific pieces of additional work which we requested at those sessions.

At this stage we envisage that it is likely that we will be able to conclude that the plan is sound and legally compliant, subject to the main modifications we indicated were necessary at the hearing sessions and the following further modifications:

- **Policies SP3 and DP7** – specifically stating in policy SP3 the plan period employment floorspace requirement and ensuring that the two policies and their supporting text are consistent with the Council's note 'Action arising from Matter 3 – providing detailed calculations of industrial jobs growth, floor space requirements and supply capacity'
- **Crossness Sewage Works** – in order that policy DP7 is justified and effective the policies map needs to be revised so that (i) the boundary of the Crossness Sewage Treatment Works Operational Land (CSTWOL) is the same as that you have agreed with Thames Water (ii) the entire revised CSTWOL area is designated as Strategic Industrial Land and (iii) the boundary of the Metropolitan Open Land in this area is consistent with the revised CSTWOL area. The last is necessary and justified because this land is already predominantly developed with critical infrastructure, further development of which, without this revision, would require the demonstration of very special circumstances. However, the SINC and other designations within the revised CSTWOL area should remain unchanged from that shown on the Submission Policies Map.

- **Site allocation CRA1 and adjoining land** - we will set out our reasoning in full in our final report on the examination but, having regard to the written evidence and discussions at the hearing sessions, we conclude that the “triangle” land’s proposed designation as SINC is justified, as is the alignment of the Strategic Green Corridor as shown on the proposed Policies Map. Moreover, for the plan to be sound it is not necessary or appropriate for the “triangle” land to be included in the CRA1 site allocation.

However, we conclude that the land’s designation as Urban Open Space is not justified. This is primarily because, whilst it is open (ie undeveloped), as land at the edge of the built-up area it does not act as a break in the built-up area and we consider its contribution to landscape character, as distinct from that of the Green Belt to the west and the river corridor to the north and east, is minimal. Moreover, it is not justified to exclude this land from the Sustainable Development Location given its distance from the relevant key facilities and that other areas of SINC/Strategic Green Corridor designation are within Sustainable Development Locations. Whilst a fence separates this land from the area shown to be within the Sustainable Development Location on the submission policies map, this fence could be readily removed.

Consequently, for the plan to be sound changes to the policies map are necessary to remove the Urban Open Space designation from the “triangle” land and to align the boundary of the Sustainable Development Location with that of the Green Belt boundary to the west of this land.

- **Consistency of Terminology**

As we have previously informally indicated, for the plan to be effective there is also a need to ensure there is consistency in terminology within the plan itself and between the plan and the designations shown on the policies map.

We understand that you have already made good progress in preparing the main modifications and policies map changes we indicated were necessary at the hearing sessions. We should be grateful if you would now complete this work with the addition of these additional changes in order that the schedule of modifications and policies map changes can be the subject of Sustainability Appraisal (SA) and Habitats Regulations Assessment (insofar as is necessary) and then formal public consultation.

We emphasise that these are not our final conclusions on the plan which will be set out in detail in our report on the examination and, of course, will be informed by the SA, HRA and public consultation. Should the Council be minded to not adopt the plan on the basis of these modifications please advise us as soon as possible in order that we can consider how best to take forward the examination.

Please contact us via Andrea if you have any queries. However, we are not inviting, nor envisage accepting, comments from any other parties to the examination at this stage.

Yours sincerely

Malcolm Rivett and Deborah Board

INSPECTORS