

# Statement of compliance with the Duty to Cooperate

Local Plan Proposed Submission Document  
Regulation 19 Stage

May 2021

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# 1. Introduction

## Purpose of this statement

This statement outlines how London Borough of Bexley [‘the Council’] has prepared the Bexley Draft Local Plan Proposed Submission Document (Regulation 19 Stage) in accordance with Duty to Cooperate legislation. It sets out how and when, in the preparation of the document, the Council has engaged with representatives of identified Duty to Cooperate bodies that are prescribed in the relevant legislation, on relevant strategic matters and the actions and outcomes that have informed the Draft Local Plan.

This statement is a ‘living document’ that will be updated as new issues on strategic matters arise or if additional strategic bodies need to be involved in discussions, prior to the submission of the Plan.

## Background

### Stage 1: Review

In accordance with the NPPF and planning regulations, a review of the current Bexley Local Plan, comprising the Core Strategy and saved policies and proposals map from the Unitary Development Plan (UDP), commenced in 2017 to assess whether it needed updating. A decision was made to move forward with a single local plan that would replace these existing documents, taking on board all of the research and evidence collection that had taken place since the Core Strategy was adopted.

### Stage 2: Bexley Growth Strategy

In 2017 the Council adopted the Bexley Growth Strategy. The strategy was the first step in updating the Council’s Local Plan documents and set the foundations as to how good growth could be achieved in Bexley. It sought to ensure that growth is managed carefully to benefit local people, bringing benefits to transport connectivity, economic prosperity and skills.

### Stage 3: Call for Sites

In order to establish what land was available within the borough for development of all kinds; for example, new homes, schools, employment opportunities, parks, leisure and recreation, or community facilities, the Council undertook a Call for Sites exercise that took place for a period of nine weeks from 19 June to 18 August 2017.

Various methods of engagement encouraged residents, landowners, community organisations and other interested parties to submit details of sites they wished to be assessed for future development potential or change of land use. A total of 51 responses were received.

### Stage 4: Regulation 18 consultation

In February 2019 the Council consulted on the Regulation 18 document: Preferred approaches to planning policies and land-use designations. This document set out the Council’s preferred approaches across six themes, in three main sections:

- Part I: strategic and development management policies
- Part II: spatial policies including land use designations
- Part III: recommendations for land use designations for sites put forward through the Council’s ‘call for sites’ exercise and from other sources, such as the GLA’s strategic housing land availability assessment study.

The six themes were:

- Bexley's growth – sustainable growth and place making
- Bexley's homes – mixed and balanced communities
- Bexley's economy – including town centres
- Bexley's character – including good design and heritage
- Bexley's infrastructure – transport, community, digital and waste
- Bexley's environment – open space, biodiversity, climate change

The preferred policy approaches were accompanied by explanatory text on why the policy is needed and how to implement the policy in practice where further detail is required. A key diagram was also included in the consultation paper.

### **Stage 5: Draft Local Plan Regulation 19 consultation**

The Council has prepared a proposed submission version of the Local Plan that takes into consideration the responses received during previous rounds of public consultation. Public consultation on the Draft Local Plan Proposed Submission Document will be carried out for eight weeks from 28 May to 25 July 2021.

This stage represents the final opportunity for the public to make comments on the content of the Plan. The consultation will be undertaken in accordance with the Statement of Community Involvement (reviewed and updated in response to MHCLG planning guidance for the coronavirus (COVID19) pandemic May 2020) and in line with regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

## 2. Legislation and Guidance

### **Planning and Compulsory Purchase Act 2004**

The Localism Act 2011 amended Section 33 of the P&CPA by setting out, in Section 33A, that local authorities must cooperate with prescribed bodies and neighbouring local authorities to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters relating to sustainable development.

A strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas

### **The Town and Country Planning (Local Planning) (England) Regulations 2012**

Other public bodies, in addition to local planning authorities, are subject to the Duty to Cooperate.

Regulation 4 sets out these prescribed bodies:

- Environment Agency
- Historic England
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency (Greater London Authority in London)
- Each Primary Care Trust established under the National Health Service Act 2006 (now Clinical Commissioning Group)
- National Health Service Commissioning Board
- Office of Rail Regulation (now Office of Rail and Road)
- Each integrated transport authority (Transport for London)
- Each highway authority
- Marine Management Organisation

### **3. Demonstrating compliance with the Duty to Cooperate**

#### **Relationship with the London Plan 2021**

The Council works in close partnership with the Greater London Authority (GLA) and Transport for London (TfL) and all parties have taken part in frequent meetings and correspondence throughout the production of the Bexley Draft Local Plan. Many strategic issues have been resolved through this process.

Importantly, this has allowed the Council to work with the GLA to address, in the preparation of its Local Plan, the changing nature of the London Plan as it has progressed from inception to adoption - all of which has happened at the same time as the Council's review of its Local Plan.

The Council has responded to the following key stages of London Plan production; consultation draft, publication, consolidated suggested changes version, examination in public, report from the Panel of Inspectors, Intend to Publish London Plan and the Secretary of State directed changes and correspondence. The new London Plan 2021 was formally published by the Mayor on 2 March 2021.

There is a requirement for the Bexley Local Plan to be in general conformity with the London Plan. Within this context, local policy approaches are appropriate and indeed London Plan policy expects these to be set out in London boroughs' local plans. However, there are certain areas where a locally distinctive approach has been taken that differs from the strategic London Plan policy but that is justified by local evidence. The Council has raised these matters with the GLA and TfL during the preparation of this Draft Local Plan. Specifically, these matters relate to:

- Bexley Riverside Opportunity Area (OA)
- Parking management policy
- Lower Belvedere District Centre

#### **Bexley Riverside OA**

The GLA has raised concerns that the Bexley Local Plan does not actively promote the Bexley Riverside OA. They would like to see a narrative around the potential of the OA in the Bexley Local Plan and the boundary defined on a map.

Bexley Riverside is included as an OA in the London Plan with an indicative boundary. The final boundary will be defined as part of the preparation of a planning framework for the OA. The London Plan identifies a minimum number of 6,000 new homes and an indicative employment capacity of 19,000 jobs. These figures will be reviewed as part of the preparation of the planning framework for the OA. The London Plan notes that in some OAs the necessary infrastructure to support the proposed level of growth has not been committed. Therefore, the potential of the OA to deliver growth may be beyond Bexley's Plan period.

The Council considers that defining the area of the Bexley Riverside OA cannot be progressed at these early stages until further work is undertaken with the GLA on a planning framework for the area. Much of the area is within PTALs of 0-1 with no identified planned infrastructure and could lead to high levels of intensification in an unsustainable location.

#### **Parking management**

TfL raised concerns over Bexley's preferred approaches to parking standards in the Regulation 18 Local Plan document with regards to the deviation from London Plan parking standards. The Council has worked

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closely with TfL to adapt the approach to parking standards in the borough and the proposed Regulation 19 policy is in greater conformity than that at Regulation 18 stage. Notwithstanding this TfL still have concerns about some areas of divergence.

The main areas of concern are the standards proposed for family housing and in Opportunity Areas. The Council is proposing higher maximum parking standards than the London Plan for family housing (3 or more bedrooms) in poorly connected areas of PTAL 2 i.e. those further than 5 minutes walking distance from a town centre and railway station.

The Council is also proposing that the GLA's parking standards for outer London OAs would only apply to Thamesmead and Abbey Wood OA and not to Bexley Riverside OA as the planning framework is yet to be progressed or investment confirmed. Much of the proposed Bexley Riverside OA is underserved by public transport and there are areas that do not fall within a sustainable development location.

### Lower Belvedere District Centre

The London Plan 2021 identifies Belvedere as having potential as a future district centre. The GLA consider it too soon to allocate Belvedere as a district centre and are concerned that this designation could lead to unsustainable development in the area if applied now. They have suggested that the centre should not be allocated any sooner than the next review of London Plan Annex 1: Town Centre Network.

The Council would like to designate Belvedere as a district centre in the Local Plan. Evidence shows that the area within the proposed town centre boundary for Belvedere, is already functioning at district level status according to the GLA's definition of a district centre in the London Plan Annex 1. Allocating it in this Local Plan it will enable new retail capacity to be directed into the centre and help it realise its potential. Unless it is granted town centre status any town centre development here could be classed as 'out-of-centre' and may need to be refused unless it passes the national sequential and impact tests.

This collaborative work will culminate in the production of a Statement of Common Ground which is currently in preparation.

Body	Correspondence sent (Y/N)	Reg 18 response (Y/N)	DtC meetings
GLA London Plan Team	Y	Y	Throughout the local plan production process including three general and three topic specific meetings specifically for the development of the Bexley Regulation 19 Document: General: September 2020, March 2021 x 2, April 2021 Affordable housing thresholds: November 2020 Industrial Land Study: September 2019, September 2020 Belvedere District Centre: March 2021
TfL	Y	Y	Throughout the local plan production process including three general and two specific meetings specifically for the development of the Bexley Regulation 19 Document: September 2020 March 2021 April 2021

Body	Correspondence sent (Y/N)	Reg 18 response (Y/N)	DtC meetings
TfL Commercial (land)	Y	Y	
London HUDU and Bexley CCG	Y	Y	Throughout the local plan production process and specific Regulation 19 meetings in September 2020.
Local Enterprise Partnerships - LEAP	N	N	The GLA and TFL engage with London boroughs on behalf of LEAP.
London Local Nature Partnership	Y	N	London LNP declined a formal meeting.

## Relationship with other Duty to Cooperate bodies

### London Councils and ALBPO

London Borough of Bexley is a member of London Councils, a cross-party organisation that represents London's 32 borough councils and the City of London Corporation. London Councils represents its members in front of the Government, the Mayor of London and any other bodies and works to develop policies that will help the members deliver the best possible deal for their residents.

London Councils runs several committees, networks, and forums. In relation to planning issues, the Association of London Borough Planning Officers (ALBPO) is run by London Councils. London Borough of Bexley's Planning Policy Officers attend the regular meetings of the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group where strategic matters and new development plans are discussed.

### Southeast London Planning Authorities' Policy Group (SELPG)/Southeast London Housing Partnership

The group is comprised of London Boroughs of Bexley, Bromley, Lewisham and Southwark and Royal Borough of Greenwich. It was originally set up as the Southeast London Housing Partnership in 2008 to work together on housing matters, jointly producing a Strategic Housing Market Assessment for the Southeast London sub-regional housing market area in 2009 and then again in 2014.

In 2012 the group formed the Southeast London Planning Authorities' Policy Group to hold regular Duty to Cooperate meetings on all strategic cross-boundary matters as well as housing.

### Southeast London Joint Waste Planning Group (SELJWPG)

The SELJWPG was formally ratified in July 2007 and comprises of London Boroughs of Bexley, Bromley, Lewisham and Southwark, Royal Borough of Greenwich and the City of London Corporation. All members are local planning authorities (LPAs) and unitary waste authorities who are working together to meet the requirements set out in the London Plan for waste management facilities by pooling their apportionment requirements at a sub-regional level. The group also collectively responds to Duty to Cooperate matters where appropriate.

The group, made up of planning policy and waste planning officers from each borough, produces a joint waste planning technical paper, a living document that is updated as evidence to support the submission of each LPA's local plan. The approach taken has been supported by Inspectors for those local plans already adopted. The group remains committed to joint working and meet as needed to produce each iteration of the technical paper.

## London Waste Planning Forum (LWPF)

Waste planning authorities in London and across the wider Southeast, the EA, GLA, LWARB, London Councils and other London organisations dealing with waste are members. The Forum provides a framework to support and coordinate waste planning in London. The Forum enables authorities to engage and cooperate on strategic waste matters that cross administrative boundaries. Duty to Cooperate is a standing item on the agenda and the Forum meets quarterly. London Borough of Bexley is an active member, representing the SELJWPG as Chair. The LWPF makes collective responses to policy documents and the members of the Forum agree a consistent approach to waste planning, including the definition of strategic levels of waste movements for statements of common ground.

## Junction 1a Steering Group

Highways England, Kent County Council and Dartford Borough Council set up a joint Steering Group in 2020 to address the cross-boundary issues arising due to congestion at Junction 1a of the M25 and work up a programme of projects and provide solutions into the future. Membership was extended to London Borough of Bexley in the autumn of 2020 although the Council does not have the full status of key stakeholder. Two representatives from the Council may attend meetings – a transport planner and a strategic planner.

## Regulation 18 to Regulation 19 policy development

The discussions with stakeholders to develop the Local Plan as part of the Duty to Cooperate have been ongoing since the Local Plan review in 2017. More targeted engagement activities on specific issues relating to the Regulation 18 document and the development of the Bexley Draft Local Plan (Regulation 19) took place via virtual Microsoft Teams meetings from September to January 2020.

Full details of the Council's cooperation with all appropriate prescribed bodies are set out in Table 1.

Table 1: list of neighbouring authorities and other prescribed bodies

Body (DtC group in brackets if relevant)	DtC type	Regulation 18 correspondence sent (Y/N)	Regulation 18 response received (Y/N)	Specific DtC meetings for Regulation 18 to 19 policy development	Statement of common ground in preparation?
Kent County Council	neighbouring planning authority	Y	N	13/10/2020	Y
Barking and Dagenham	neighbouring planning authority	Y	N	25/01/2021	N
LB Bromley (SELBG and SELJWPG)	neighbouring planning authority	Y	Y	23/09/2020	Y

<b>Body (DtC group in brackets if relevant)</b>	<b>DtC type</b>	<b>Regulation 18 correspondence sent (Y/N)</b>	<b>Regulation 18 response received (Y/N)</b>	<b>Specific DtC meetings for Regulation 18 to 19 policy development</b>	<b>Statement of common ground in preparation?</b>
Dartford Borough Council	neighbouring planning authority	Y	Y	Throughout the Local Plan production process and Reg 18 to 19 meeting 02/09/2020	Y
Royal Greenwich (SELBG and SELJWPG)	neighbouring planning authority	Y	Y	28/09/2020	Y
LB Havering	neighbouring planning authority	Y	N	Written correspondence	N
LB Lewisham (SELBG and SELJWPG)	neighbouring planning authority	Y	Y	30/09/2020	Y
Sevenoaks District Council	neighbouring planning authority	Y	Y	Throughout the Local Plan production process and Reg 18 to 19 meeting 8/10/2020	Y
LB Southwark (SELBG and SELJWPG)	neighbouring planning authority	Y	N	22/09/2020	Y
Thurrock Council	neighbouring planning authority	Y	N	10/09/2020	N
Environment Agency (LWPF)	other prescribed body	Y	Y	15/09/2020	N
Historic England	other prescribed body	Y	Y	08/10/2020	N
Natural England	other prescribed body	Y	Y	n/a Natural England were unable to attend a DtC meeting due to lack of resources.	N
Civil Aviation Authority	other prescribed body	Y	N	n/a Followed up Reg18 consultation with emails dated 18/08/2020 and 30/09/2020. No response.	N

Body (DtC group in brackets if relevant)	DtC type	Regulation 18 correspondence sent (Y/N)	Regulation 18 response received (Y/N)	Specific DtC meetings for Regulation 18 to 19 policy development	Statement of common ground in preparation?
LHUDU/Bexley & Greenwich CCG/Oxleas NHS Trust	other prescribed body	Y	Y	Throughout the Local Plan production process, Local Plan presentation to Bexley CCG on 13/03/2019 and Reg 18 to 19 meeting 29/09/2020	Y
Office of Rail and Road	other prescribed body	Y	N	n/a Followed up Reg18 consultation with emails dated 18/08/2020 and 30/09/2020. No response.	N
Highways England	other prescribed body	Y	Y	24/09/2020	Y
Port of London Authority	other prescribed body	Y	Y	1/10/2020	N
Sport England	other prescribed body	Y	Y	7/10/2020	Y
Marine Management Organisation	other prescribed body	Y	Y	12/10/2020	N
Local Nature Partnerships: Kent LNP	other prescribed body	Y	N	n/a Kent LNP do not respond to individual local plan developments.	N

## Statements of Common Ground

Alongside the Duty to Cooperate, the 2018 revision to the NPPF introduced a requirement to produce Statements of Common Ground throughout the plan-making process. These are a written record of the progress made by strategic plan making authorities on strategic cross-boundary issues as they prepare local plans. They document where effective cooperation is taking place as plans are drawn up and taken through the statutory process to adoption.

As a result of the ongoing Duty to Cooperate meetings and correspondence detailed in the previous section and in accordance with paragraph 27 of the NPPF, the Council anticipates producing statements of common ground with the following bodies:

- Greater London Authority and Transport for London
- London Healthy Urban Development Unit (HUDU) and Bexley Clinical Commissioning Group
- South East London Planning Authorities' Policy Group (LB Bromley, Royal Greenwich, LB Lewisham, LB Southwark)

- City of London and City of Westminster
- Kent County Council and Highways England
- Dartford Borough Council
- Sevenoaks District Council
- Environment Agency
- Sport England
- Thames Water

Statements of Common Ground are not proposed with a number of bodies as set out in the table above. This has been informed by discussions with those bodies where it is considered that there are no strategic, cross boundary issues which need to be addressed.

Early draft Statements of Common Ground have been prepared and will continue to be updated as the Local Plan progresses.

## 4. Evidence of cooperation on strategic matters

### Housing and gypsy and traveller accommodation

#### Duty to Cooperate bodies

- South East London Boroughs Group (SELBG)
- Dartford Borough Council
- Sevenoaks District Council

#### Areas for cooperation

- a) Housing need and land availability
- b) Gypsy and traveller accommodation

#### a) Housing need and land availability

##### Background

In 2017 the GLA produced a London Strategic Housing Land Availability Assessment (SHLAA) to inform the housing targets in the new London Plan. It covered a 25-year period from 2016 to 2041. The study drew on four sources of capacity: planning approvals; site allocations; potential sites identified through the call for sites or GLA/TfL studies or borough's local knowledge and; small sites based on annual trends.

The South East London Borough Group is considered to cover a housing market area and in the past joint strategic housing market assessments (SHMA) have been carried out. In 2017 the Council decided to carry out a local SHMA that would take an in-depth and broader look at housing need in Bexley than previous SHMAs had done.

Although Sevenoaks is an adjoining borough (with a minor section of shared boundary) neither the Council nor Sevenoaks DC consider the housing market area to be shared as agreed in the joint Statement of Common Ground between the Council and Sevenoaks in 2019.

##### Key discussion points

London boroughs of Bromley and Lewisham and Royal Greenwich all responded to the Regulation 18 consultation with a query as to whether London Borough of Bexley could commit to achieving the housing targets set out in the London Plan and stated that they would be unable to take any of Bexley's potential unmet housing need. During individual DtC meetings with each local authority that took place in September 2020 DtC, the Council explained Bexley's spatial strategy and the ongoing work on the housing trajectory showing that Bexley would be capable of meeting the London Plan housing target.

##### Next steps

The Council will continue to keep Duty to Cooperate bodies informed with regards to Bexley's ability to meet the London Plan housing target.

#### b) Gypsy and traveller accommodation

##### Background

The Government's Planning Policy for Traveller Sites 2015 sets out that the preparation of Local Plans and setting of pitch and plot targets should be undertaken by local planning authorities working collaboratively with neighbouring planning authorities and reiterates that local planning authorities have a Duty to Cooperate on planning issues that cross administrative boundaries.

The Council commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) in 2017 to identify the accommodation needs of Gypsies and Travellers, Travelling Showpeople and houseboat dwellers from across the Borough. The study carried out consultation with stakeholders including neighbouring councils. It also looked at any potential cross-boundary issues.

The Study did not identify any significant cross-boundary matters with regards to regular movement of Gypsies, Travellers and Travelling Showpeople from neighbouring areas or difficulties with any sites or locations close to the boundary of the study area. A local landowner, Peabody, reported some trespassing issues onto Peabody land in Thamesmead due to a blanket ban on unauthorised encampments taken out by Greenwich Council in Dec 2017. Sevenoaks DC, Dartford BC and Royal Greenwich provided details of unauthorised encampments in their areas as part of evidence gathering for the study.

With regards to local need for pitches in Bexley, the Council considers that it will be able to meet the need identified in the Bexley GTAA through the intensification or extension of existing sites within Bexley without needing to request help from neighbouring boroughs.

### **Key discussion points**

Dartford BC confirmed during a DtC meeting in September 2020 that they can meet their own identified need for traveller pitches in Dartford. LB Bromley, LB Lewisham, LB Greenwich, LB Southwark and Sevenoaks DC raised no cross-boundary issues with regards to pitch provision or unauthorised encampments.

### **Next steps**

The Council will continue to keep neighbouring boroughs informed with regards to Bexley's ability to meet the identified need for gypsy and traveller pitches.

## **Economy**

### **Duty to Cooperate bodies**

- London Borough of Bromley
- Royal Borough of Greenwich
- Dartford Borough Council

### **Areas for cooperation**

- a) Designated Industrial Land
- b) Foots Cray Business Area
- c) Retail and town centres

#### **a) Designated Industrial Land**

##### **Background**

Bexley has an established industrial land base consisting of mainly traditional industrial activities that are often located within Bexley's London Plan Opportunity Areas. However, some existing employment areas and sites are not well suited to the needs of modern business, as they suffer from poor public realm and ageing infrastructure.

The Draft Local Plan will set enough employment land aside to accommodate jobs growth, however the Council has also identified a need to stimulate land-use intensification in employment locations through transition to a circular economy model. The Bexley Industrial Land Intensification Study has provided the

evidence for the release of designated employment land through the assessment of sites, and the setting out of considerations to guide future uses on the released sites. It also identifies potential sites as being viable for intensification.

### **Key discussion points**

Royal Greenwich raised concerns within their written response to the Regulation 18 consultation and during a DtC meeting in September 2020 with regards to the loss of employment in Bexley and the potential impact this could have on the economic function of the sub-market Thames Gateway area between LB Bromley, the Council and Royal Greenwich. The Council explained that, even though there is no longer a requirement in the new London Plan to be a 'retain' borough, we are still following the 'no net loss' of employment land principle through the planned intensification of remaining employment land. The Bexley Industrial Land Study has provided the evidence for this process. It was therefore agreed between Royal Greenwich and the Council that there should be no negative impact on the wider industrial market area.

### **Next steps**

The Council will continue to keep Royal Greenwich and LB Bromley informed of the outcomes of the Bexley Industrial Land Study.

## **b) Foots Cray Business Area**

### **Background**

Within the Regulation 18 Consultation Document, the Strategic Industrial Location (SIL) of Foots Cray Business Area was identified as a location where B1a offices would be permitted as an exception due to a concentration of large office premises and a healthy and well-functioning office market in this location. After gathering further evidence that showed there was no additional demand for office space in this location, it was decided not to proceed with this approach in the Draft Local Plan.

### **Key discussion points**

LB Bromley raised concerns in their written response to the Regulation 18 consultation and in a DtC meeting in September 2020 with regards to the cross-boundary importance of the Foots Cray SIL and the London Plan's policies that discourage office development within SIL. They also wanted to have a clearer understanding of the amount and type of industrial development in this area and if it is likely to be office uses instead of storage and distribution-based development. The Council explained that we have changed the approach towards development in the Foots Cray area. Further research will be carried out to build a case for serving an Article 4 Direction restricting the change of use from offices to residential.

### **Next steps**

The Council will continue to keep LB Bromley informed of the outcomes of any plans for the Foots Cray area, including the progression of any Article 4 Directions.

## **c) Town centre network and hierarchy**

### **Background**

Bexley's town centre network and hierarchy were reviewed as part of the development of the new Local Plan. The proposed changes to the network and hierarchy were set out in Part II of the Regulation 18 document. The key changes proposed were a new District town centre at Belvedere Station and three new Local Centres at Abbey Wood, Bexleyheath Station and Sidcup Station.

### **Key discussion points**

The GLA raised concerns over Belvedere's capacity to sustain District Centre status in their written response to the Regulation 18 Consultation Document.

Royal Greenwich raised concerns in their written response to the Regulation 18 Consultation Document with regards to the proposed new District Centre at Belvedere potentially having a negative impact on Greenwich's town centre network. During a Duty to Cooperate meeting in September 2020 the Council explained that the area within the proposed town centre boundary for Belvedere already contains the required amount of retail floorspace to fall under the GLA's definition of a District Centre. Details were also given of the Council's aim to distribute future retail capacity from across Bexley into Belvedere as the north of the borough is lacking in retail options compared to the centre and south. This will allow the centre to grow over time and meet the need of new development in the future. Royal Greenwich confirmed that they now do not think it will have an impact on Greenwich as they can see that the floorspace is already there.

Royal Greenwich also raised concerns over the proposed Abbey Wood Village Local Centre status as currently the borough boundary splits the centre in two and Royal Greenwich do not draw boundaries around their Local Centres. They requested to see local evidence to show there is enough retail floorspace to support the upgrade. A discussion took place over possible solutions and it was agreed that the retail floorspace across the borough boundary would be reviewed.

### **Outcomes and next steps**

It was agreed that London Borough of Bexley and Royal Greenwich would carry out a more detailed assessment of potential development sites to understand how new and existing commercial uses could be accommodated across the borough boundary to achieve a local centre designation for Abbey Wood.

## **Environment and character**

### **Key Duty to Cooperate bodies**

- Royal Borough of Greenwich
- London Borough of Bromley
- London Borough of Southwark
- Dartford Borough Council

### **Areas for cooperation**

- a) Views
- b) Tall buildings

#### **a) Views**

##### **Background**

The new London Plan requires development plans to identify locally significant views and to set out what it is about the view that is significant.

Bexley's Reg 18 consultation document contained a preferred detailed policy approach DP12 Protected Views, that was informed by early findings from the Bexley Local Characterisation Study. It identified some potential views to be designated including areas around Crayford and Erith Marshes and Lesnes Abbey.

### **Key discussion points**

The Royal Greenwich, LB Bromley, LB Southwark and Dartford BC all made comments on the preferred policy approach to views in the regulation 18 document.

Dartford BC raised concerns in their reg 18 consultation response with regards to the possible impacts of protected views across Crayford and Erith Marshes on development in their borough. During a meeting between the Council and Dartford BC on 2 September 2020 a discussion took place with regards to the local evidence and it was agreed that specific views would be removed from the policy text, replaced with a reference to the supporting evidence document. Dartford BC acknowledged that the potential views would cross Green Belt space and would therefore be unlikely to affect developments in their borough.

Although not mentioned in LB Bromley's written response to the Reg 18 document, the LB Bromley raised concerns with regards to the impact on Bromley's local views from development in Bexley and cited a shared view near to Chelsfield in the Duty to Cooperate meeting on 23 September 2020. The Council agreed to work with Bromley's GIS officer to gain a better understanding of the view and to consider whether it is appropriate to designate it as a protected local view.

Royal Greenwich raised concerns in their written response to the Regulation 18 document with regards to the proposed protected Local View in preferred policy approach DP12 from Lesnes Abbey to Canary Wharf. They noted that the view would pass directly through the Woolwich riverfront and the Greenwich Peninsula masterplan area and could have an impact on development in the areas identified as potentially suitable for tall buildings in the current Greenwich Local Plan. In the subsequent Duty to Cooperate meeting on 28 September 2020, the Council explained that specific views would now be detailed in the supporting evidence, rather than in the policy and that the policy approach was about ensuring a developer considers the design of the new building in relation to the view, rather than preventing development.

### **Outcomes and next steps**

Further work undertaken on evidence to inform any potential protected local views with liaison with GIS Officer from LB Bromley with regards to possible view through Chelsfield.

Reword policy for Draft Local Plan to ensure that protected views are referenced in the evidence with clear signposts rather than policy text.

## **b) Tall buildings**

### **Background**

The Bexley Regulation 18 document contained a preferred policy approach, DP11 Building heights, that sought to define what a tall building is in Bexley and set appropriate locations for tall buildings. Since the public consultation on this document, the new London Plan has been published and Policy D9 Tall buildings sets a lower limit of 18 metres.

### **Key discussion points**

Royal Greenwich raised concerns in their written response to the Reg 18 document with regards to the tall building definition set in preferred policy approach DP11 and its potential to prejudice development in Greenwich, making it difficult for the area around Abbey Wood to develop in a cohesive way. They also recognised the joint work taking place on the Thamesmead and Abbey Wood Opportunity Area Planning Framework for the area but requested further discussion on the matter. In the subsequent Duty to Cooperate meeting on 28 September 2020, the Council explained that the definition was being reviewed in

light of the emerging Characterisation Study and new London Plan and is therefore likely to be higher. Further flexibility will also be built into the policy.

### **Outcomes and next steps**

Royal Greenwich welcomed the discussion around tall buildings and agreed the approach sounded more suitable. They will pass this information on to their officer working on the Greenwich design and characterisation studies and contact us again if necessary.

## **Infrastructure**

### **Key Duty to Cooperate bodies**

- Royal Borough of Greenwich
- Dartford Borough Council
- London Healthy Urban Development Unit (HUDU)
- Sport England
- Highways England
- Kent County Council
- Junction 1a Steering Group

### **Areas for cooperation**

- a) Transport – M25 Junction 1a and Crossrail Extension
- b) Education
- c) Playing pitches
- d) Healthcare

#### **a) Transport**

##### **Background**

M25 (A282)/A206 Junction 1a (Jn1a) is the first M25 interchange to the south of the Dartford River Crossing. The last 30+ years have seen a series of capacity enhancements at the interchange, required to support development growth across its catchment. Jn1a is an important connection point into the strategic road network for many residents and businesses in the north of the borough, via Bob Dunn Way.

The interchange is now reaching its capacity limits again – including issues for north-bound (tunnel-bound) traffic joining the motorway. The former dedicated lane for that traffic was taken away when the toll booths were removed.

Highways England (HE) as the strategic highway authority and Kent County Council (KCC) as local highway authority recognise that further interventions will be necessary to support further development growth.

##### **Key discussion points**

Highways England responded to Bexley's Regulation 18 consultation document on 5 April 2019 and raised concerns over the impact the Local Plan could have on M25 junctions 1a, 1b, 2, 30 and 31. They noted that the M25, A282 and A13 are heavily congested throughout the peak hour periods and any material increase in traffic on this section of the Strategic Road Network (SRN) would be a concern. They requested that the evidence base for the Local Plan provides indication as to what the residual impacts will be of the high level of development proposed in the Plan would be on the SRN. They also requested some minor amendments to the transport policies to ensure they reference Highways England and the SRN.

Kent County Council also identified traffic congestion issues at Junction 1a of the M25 and requested further modelling to demonstrate the impact on the Kent County Council network and where required, details of appropriate mitigation.

### **Next steps**

Following a Duty to Cooperate meeting between Highways England and the Council in September 2020 the Council agreed to carry out further evidence work to model the impacts of the Local Plan on Junction 1a of the M25. The requested changes were also made to the strategic transport policy SP10 and the detailed transport policy DP24.

The agreed modelling has been commissioned and is ongoing, with the results proposed to be published at submission stage. This is considered appropriate as it is not anticipated that the results of the modelling work will materially alter the policy approach set out in the Draft Local Plan. The Council is also continuing to attend the Junction 1a Steering Group with a view to participate in the identification of mitigation measures for the junction.

## **b) Education**

### **Background**

Bexley's Regulation 18 consultation document stated that a local assessment of overall need for educational facilities across the borough, based on Bexley's Schools Commissioning Plan, would be carried out to inform the designation and protection of educational land on the policies map. The assessment showed that Bexley has enough designated education land to meet its statutory responsibilities with regards to school place provision.

### **Key discussion points**

In a DtC meeting in September 2020 Dartford BC sought further information with regards to pupils from Dartford and Bexley attending secondary schools across the borough boundaries. The Council explained that after discussion with colleagues in the Education Department it appeared that the flow into and out of the boroughs was balanced and no one borough was taking an excessive share of the school place requirements.

In a DtC meeting in September 2020 LB Bromley raised concerns over a possible increase in pressure on Bromley schools from new development in Bexley. They sought reassurance that London Borough of Bexley was allocating enough education land in Bexley to reduce any impact on Bromley. The Council assured LB Bromley that an assessment of education land and school place requirements had been carried out to support the Bexley Local Plan and that requirements for new school places can be met on existing sites through site intensification.

### **Next steps**

The Council agreed to share data, where possible, with regards to the number of Bexley residents attending secondary schools in Dartford.

## **c) Playing pitches**

### **Background**

The Council has historically combined the land use designation of school buildings and playing fields. This land use currently has an associated policy that seeks to retain the use of the land where there is a recognised need for such facilities in the area. Through recent evidence gathering for the development of

the Local Plan it has become clear that there are some playing fields/pitches that are separate from a school building and therefore may not be covered by this policy.

#### **Key discussion points**

Sport England provided written comments to Bexley's Regulation 18 consultation and a meeting was held in October 2020 to enable Sport England to help inform the policy development for the Regulation 19 document.

Following these discussions, it was decided to identify playing pitches as a type of community infrastructure in their own right and protect them as part of a community infrastructure policy with a requirement to use the Bexley Green Infrastructure Study findings which includes an assessment of playing pitches. The policy will also protect school playing fields in the same manner.

#### **Next steps**

To continue to consult with Sport England on the Local Plan process.

### **d) Healthcare**

#### **Background**

The Council has a good working relationship with the London Healthy Urban Development Unit (HUDU) and the Bexley CCG. Following on from the Regulation 18 consultation Bexley visited Bexley CCG and gave a presentation on the document. Regular meetings have been held with HUDU, who also work closely with Bexley CCG, the most recent of which was a DtC meeting on the development of the Regulation 19 document in September 2020.

#### **Key discussion points**

In its response to the Regulation 18 consultation document, HUDU sought clarification on the amount and location of growth planned for the borough to enable the NHS to plan for population growth. During the DtC meeting in September 2020 the Council was able to take HUDU through the proposed key diagram and housing trajectory and the basis of the evidence used for population growth.

The meeting also enabled HUDU to help inform the policy development for the Regulation 19 document, with a particular emphasis on promoting good health, encouraging walking and social interaction, design to enable good health and enabling the provision of community infrastructure. HUDU were also able to provide helpful input into the development of the health impact assessments policy.

#### **Next steps**

The Council agreed to continue to keep HUDU and the Bexley CCG informed throughout the Local Plan process. Specifically, information will continue to be shared with regards to the location and amount of development planned in the borough.