

Draft Bromley Town Centre Interim Planning Statement

INTRODUCTION

At a time of significant change in the planning system and continued pressures for development, there is a requirement to provide clear guidance on the future of Bromley Town Centre in order to ensure that its future viability and performance will be protected and enhanced in accordance with planning policy objectives.

The purpose of this Interim Planning Statement is to set out policy guidance for development in Bromley Town Centre and to reiterate the Council's vision for a vibrant, thriving and safe town centre. This will assist in the determination of planning applications in the interim period leading up to adoption of the revised UDP and Bromley Town Centre Area Action Plan (AAP).

WHY IS AN INTERIM PLANNING STATEMENT REQUIRED?

The Bromley Town Centre AAP will provide the long term framework for development and change in Bromley Town Centre. It will co-ordinate development interests and will include proposals for the development of sites for shopping, commercial, community use, strategic employment, mixed-use housing areas, transport initiatives and environmental protection.

However, it is unlikely that the AAP will be formally adopted before mid 2007 and therefore, there is a requirement for guidance in assessing development proposals which may come forward during this interim period which reflects the Council's vision for the town centre, current and emerging planning policies and the objectives set out in PPS6.

The Interim Planning Statement accords with national planning policy and is in general conformity with the London Plan. For the purpose of clarification, it brings together policies in the adopted UDP and policies to be saved on adoption of the revised UDP and sets out a general vision for the town centre. It seeks to ensure that during preparation of the AAP, development proposals will not prejudice the long term viability and vitality of the town centre and will contribute to the Council's overall vision for the town centre.

The Interim Planning Statement is as a non- statutory document which will provide guidance to the Council and developers in

promoting objectives for the town centre and protecting its long term viability and vitality.

PREMATURITY

‘The Planning System: General Principles’ (2005) (published alongside Planning Policy Statement 1 -Delivering Sustainable Development) states that in circumstances where a Development plan is being prepared or is under review but has not yet been adopted ‘it may be justifiable to refuse planning permission on grounds of prematurity’.

In considering planning applications the Council will take into consideration the extent to which the proposed development would put at risk the spatial planning strategy and the vision for the town centre. In accordance with the principles set out in PPS1, the Council may refuse planning permission on the grounds of prematurity where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the Area Action Plan by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the Area Action Plan.

SCOPE OF THE INTERIM PLANNING STATEMENT

The Interim Planning Statement provides:

- Vision and objectives for a vibrant, thriving and safe town centre
- An update on national planning policy as set out in PPS6 Town Centres (March 2005)
- A summary and amplification of relevant planning policies in the London Plan and UDP
- Assessment criteria for determining planning applications
- Design guidance
- General guidelines for the development of sites allocated for development in the UDP

THE VISION FOR BROMLEY TOWN CENTRE

The Council's vision for Bromley promotes the prosperity and vitality of the Town Centre. The sustainability of vibrant town centres is one of the Council's key priorities and of the three main centres in the Borough, Bromley is the first priority. This will be achieved through the delivery of more sustainable patterns of development and through the creation of a high-quality and safe environment with high standards and inclusive designs, an appropriate and balanced mix of uses, improved accessibility, and the protection and enhancement of the built heritage and natural environment.

The vision for Bromley reflects planning policy objectives including national, regional and local guidance, particularly the objectives for the enhancement and development of existing town centres set out in PPS6. PPS6 identifies the government's commitment a planning system that facilitates and promotes sustainable and inclusive patterns of development, including the creation of vital and viable town centres. This vision will be further developed through the AAP process in consultation with stakeholder groups including local businesses, community groups and residents to ensure the emerging AAP will reflect their current and future needs and aspirations and provide a clear direction of how Bromley should develop as a town centre over the next 5 to 15 years.

Of particular importance is the need to build on the town centre's considerable assets and to make it a more competitive and attractive location for retail, leisure, business and investment. The town centre's distinctiveness is a particular strength and future development in the town centre should reinforce this.

THE CHANGING DEVELOPMENT PLAN SYSTEM

The Planning and Compulsory Purchase Act 2004 introduces major changes to the way the development plan system operates. It requires the eventual replacement of the Council's Unitary Development Plan (UDP) with a new Local Development Framework (LDF). The LDF will be a folder containing a number of local development documents (LDDs).

The existing adopted UDP (1994) is currently being revised. The Inquiry into representations to the Second Deposit Draft UDP ended in April 2004 and the Inspector's report was received in February 2005. The Council is currently considering the Inspector's recommendations and will publish the changes it proposes to make to the Plan as post-Inquiry modifications. Following consultation on the modifications, the Council expects to adopt the revised UDP in 2006. The adopted UDP will automatically be saved for 3 years from September 2004 or until superseded by adoption of the revised UDP. The adoption of the revised UDP will provide an up-to-date plan consistent with Government guidance and in general conformity with the London Plan.

On expected adoption in 2006 the UDP policies will be saved for three years until 2009 and will form part of the LDF until that time. The UDP will continue to be the statutory planning document for development control purposes but as the individual elements of the LDF are prepared and adopted, these will replace the saved UDP and the policies and proposals in the UDP that are replaced will be withdrawn.

The Council has prepared a Local Development Scheme (LDS) setting out how the Council will develop its LDF over a 3 year period (and beyond). The document provides a schedule of the proposed Development Plan Documents and Supplementary Planning Documents. Priority is being given to the preparation of an Area Action Plan (AAP) for Bromley Town Centre which recognises the Metropolitan designation of the centre in the Mayor's London Plan and supports the policy emphasis being given by the Council for 'vibrant, thriving and safe town centres'. It is recognised that it is an area where more detailed local policy and site allocations are needed to guide changes that will continue to take place after the UDP policies cease to be saved.

Work has now commenced on preparation of the Bromley Town Centre AAP. Consultation is being undertaken with stakeholders on the issues and development of a vision and options for the town centre. Formal public consultation on the preferred options will be undertaken in January 2006 with the preparation of the Draft AAP in Spring 2006 and submission of the AAP for examination in July 2006. Examination of the Draft AAP by an independent Planning Inspector is expected to take place in January 2007 with an estimated date for adoption of the AAP in July 2007.

There is also a requirement to reflect recent national planning policy statements and regional planning policy objectives as set out in the Mayor's London Plan. Of particular importance is the increasing emphasis placed on sustainable development and the need to take into account Planning Policy Statement 6 (PPS6) which was published in March 2005 and provides the most up to date policy context for planning for the growth, enhancement and development of existing town centres, which has been adopted since the preparation of the Second Deposit Draft UDP.

RELEVANT PLANNING POLICY DOCUMENTS

The following planning policy documents will be taken into account in the consideration of development proposals in Bromley Town Centre:

- Relevant National Government Planning Policy Guidance (PPG) and Planning Policy Statements (PPS);
- London Plan (February 2004)
- Regional Supplementary Planning Guidance (SPG) as set out in Accessible London: Achieving an inclusive environment (April 2004)
- Adopted Unitary Development Plan (1994)
- Second Deposit Draft Bromley Unitary Development Plan (September 2002)
- Supplementary Planning Guidance in the Bromley Town Centre Conservation Area Statement (adopted June 1999 and updated December 2001).
- General Design and Principles (Supplementary Planning Guidance adopted January 2004)
- Residential Design Guidance (Supplementary Planning Guidance adopted January 2004).

The Area Action Plan for Bromley will take full account of this guidance in developing a framework that will guide and assess the cumulative impact of current and future development proposals and have a fundamental role in optimising the economic role of the town centre over the next 5-15 years.

In accordance with National, Regional and Local Policy, the Council will promote a form of development that minimises the need to travel, and which is of the highest architectural quality. Given that much of the town centre lies within the Conservation Area, the Council will welcome proposals that enhance its character and appearance. In compliance with guidance, the Council will seek to improve the public realm and public spaces in the town centre and will promote active uses around these spaces to ensure their use throughout the day and into the evening. This will help to combat anti-social behaviour in areas where there is currently a lack of natural surveillance.

The following section summarises the key planning policy considerations.

National Planning Policy Guidance

National Planning Policy Guidance promotes high quality and sustainable development. Sustainable communities require sufficient quality housing to meet the needs of the community, a flourishing local economy supported by adequate infrastructure, a high quality safe and healthy environment and the amenities and sense of space and place to support a diverse and vibrant local community.

The overarching policy objective of the Government is to achieve more sustainable development through:

Concentrating development on brownfield land
 Ensuring good accessibility by public transport
 Promoting a mix of land uses

PPS6 : Planning for Town Centres

Of particular importance in the consideration of development proposals in Bromley Town Centre in the period before adoption of the AAP is PPS6: Planning for Town Centres. This document was adopted in March 2005 and provides the most up to date statement of Government policy on planning for town centres. The Government's key objective for town centres is to promote their vitality and viability by:

planning for the growth and development of existing centres;
 promoting and enhancing existing centres, by focusing development in such centres and
 encouraging a wide range of services in a good environment, accessible to all.

This key objective also needs to take account of the Government's other key objectives in this area, namely:

ensuring the provision of comprehensive consumer choice in shopping and leisure facilities and local services for a diverse community including socially-excluded groups;
 supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity; and
 improving accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport.

The following wider policy objectives are also relevant:

- promotion of social inclusion ensuring that communities have access to a range of main town centre uses
- promotion of economic growth
- delivering more sustainable patterns of development, ensuring that locations are fully exploited through high density, mixed use development and promoting sustainable transport choices including reducing the need to travel and providing alternatives to car use
- promotion of high quality and inclusive design, improving the quality of the public realm and open spaces, protection and enhancement of the architectural and historic heritage of centres, providing a sense of place and a focus for the community and for civic activity and ensuring that town centres provide an attractive, accessible and safe environment for businesses, shoppers and residents.

Bromley Council is required to implement the Government's objectives for town centres by planning positively for their growth and development. In the preparation of the Bromley Town Centre AAP, the Council will be required to:

- assess the need for further main town centre uses and ensure there is capacity to accommodate them
- focus development in and plan for the expansion of existing centres as appropriate and at the local level identify appropriate development sites
- promote town centre management, improve and maintain the town centre and manage the evening and night-time economy
- regularly monitor and review the impact and effectiveness of their policies for promoting vital and viable town centres

The guidance applies to the following main town centre uses:

- retail
- leisure, entertainment facilities and sport and recreation uses (including cinemas, restaurants, bars, night clubs)
- offices
- arts, culture and tourism (theatres, museums, galleries, hotels and conference facilities)

Housing is not identified as a main town centre use but is identified as an important element in most mixed-use, multi-storey developments.

It is recognised that planning authorities may be required to determine planning applications which include main town centre uses before the development plan can be reviewed to reflect the guidance set out in PPS6. This is the situation facing Bromley Council where the development plan predates PPS6. In these circumstances, the Council will be required to have regard to the policies in PPS6 as material considerations which may supersede the relevant policies in the development plan.

Other relevant guidance is summarised below.

PPG 1: General Policy and Principles (February 1997)

The Government's approach to the planning system, as outlined in PPG 1: General Policy and Principles, is underpinned by the three interrelated themes of sustainable development, mixed use and design:

Sustainable development seeks to deliver the objective of achieving economic development to secure higher living standards, while protecting and enhancing the environment. In particular, a sustainable framework should seek to use already developed areas in the most efficient way while making them more attractive places in which to live and work and to shape new development patterns in a way which minimises the need to travel;

Mixed use development can help create vitality and diversity and reduce the need to travel. The planning system seeks to deliver high quality mixed use developments, high standards of urban design, access to public open space and ready access to public transport;

Emphasis is placed on good design. The effects of new development has a significant effect on the character and quality of an area and design is recognised as a matter of public interest.

Draft PPS1: Creating Sustainable Communities (February 2004)

The Government's commitment to the creation of sustainable communities and the delivery of sustainable development is reiterated in Draft PPS1 which focuses on:

The need for planning authorities to take an approach based on integrating the four aims of sustainable development: economic development; social inclusion; environmental protection and prudent use of resources;

The need for positive planning to achieve sustainable development objectives and proactive management of development;

The need for plans to set clear visions for communities and to help to integrate the wide range of activities relating to development and regeneration;

The need for the planning system to actively promote participation and involvement.

PPS1 states that planning should facilitate and promote sustainable patterns of development by:

Making suitable land available in line with objectives to improve the quality of life;

Contributing to sustainable economic growth;

Protecting and where possible enhancing the natural and historic environment and existing successful communities;

Ensuring high quality development through good design;

Ensuring that development supports existing communities and contributes to the creation of safe, sustainable and liveable communities with good access to key services.

PPS1 promotes development that builds socially inclusive communities and the need to address accessibility to jobs, health, housing, education, shops, leisure and community facilities.

PPG 3: Housing (March 2000)

PPG 3 establishes the Government's objectives for housing and reinforces the commitment to more sustainable patterns of development. Sustainable development is to be achieved through concentrating the majority of additional housing development within urban areas, making efficient use of land, maximising the re-use of previously developed land and creating compact mixed use and balanced communities. It seeks to ensure that housing development is well connected to and well served by public transport facilities and comprises high quality built development and open spaces.

PPG3 sets broad guidelines for the provision of affordable housing, placing emphasis on the importance of creating mixed, balanced and integrated communities.

PPG3 also provides guidance on transport in relation to housing. The guidance encourages local authorities to revise their parking standards to allow significantly lower levels of parking provision in all housing developments. The guidance encourages local

authorities to increase the density of development at, and immediately around locations with good accessibility, and sets minimum densities for new development.

PPG4: Industrial and Commercial Development and Small Firms (November 1992)

PPG4 emphasises the need for development to take account of the locational demands of business and wider environmental objectives. The guidance reiterates PPG1 and other guidance by highlighting the contribution that mixed uses have in achieving sustainable development, the importance of re-using urban land, and minimising the need to travel (especially by private car). It encourages the provision of a range of employment land and accommodation

PPG13: Transport (March 2001)

PPG13 outlines the government's aim of achieving reduced car dependency via transport and planning policies that are integrated at the national, strategic and local level. The Guidance places an emphasis on putting people before traffic, indicating that new development "should help to create places that connect with each other sustainably, providing the right conditions to encourage walking, cycling and the use of public transport." When assessing planning applications, PPG 13 requires local authorities to intensify housing and other uses at locations which are highly accessible by public transport, walking and cycling. The Guidance goes on to say that: "Local planning authorities in assessing the suitability of sites for housing development should, amongst other things, consider their location and accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility" (paragraph 14).

PPG17: Sport and Recreation (July 2002)

PPG17 seeks to protect and where possible enhance open space and recreation facilities and promotes the creation of high quality open spaces which are accessible and well-suited to the needs of the communities they serve.

Sustainable Communities: Building for the Future (February 2003)

Sustainable Communities: Building for the Future is a non-statutory Action programme issued by the ODPM. It identifies key proposals for sustainable growth in housing supply over the next 15 years. The initiative aims to deliver sustainable communities through such measures as raising the standard of homes and developing additional affordable homes. It forms part of the Government's wider initiative to raise the quality of life within communities and identifies the elements that form a sustainable community: these include flourishing local public transport system, housing choice, good quality public services, diversity and a sense of place.

Regional Planning Policy

The London Plan (February 2004)

The regional planning policy context for the London Borough of Bromley is provided by the London Plan (February 2004). The London Plan supersedes RPG9 as the strategic policy framework for London. Consequently, RPG9 has ceased to be a material consideration in the determination of planning applications for London. The Mayor of London's vision for the city is to create a strong and diverse economy, which has long-term sustainability.

Bromley is identified in the London Plan as a Metropolitan Town Centre. Metropolitan Centres serve wide catchment areas covering several boroughs and offer a high level and range of comparison shopping. They typically have over 100,000 square metres of retail floorspace, including multiple retailers and department stores. They also have significant employment, service and leisure functions. Like many of its neighbours in the sub region, it is a key local economy in its own right as well as having a supply-chain relationship with the central London economy. The Mayor expects the development of a minimum of 11450 dwellings by 2016, just under a fifth of the total expected for the South London Region as a whole which will accommodate 42,000 additional homes. It will be responsible for a share of the expected 36,000 new jobs in the sub-region by 2016.

The London Plan states that 'all designated town centres in the sub region should consider how their roles should be consolidated or enhanced to meet retail and other consumer needs and to increase capacity for mixed-use development including housing'.

The London Plan places particular emphasis on the need to ensure that development proposals achieve the highest possible intensity of use compatible with local context, design principles for a compact city and with public transport capacity. The Plan states that Boroughs should adopt the residential density ranges set out in the London Plan. A density range of 250-350 habitable rooms/ hectare (80-120 units/ hectare is recommended for suburban sites within 10 minutes walking distance of a town centre and with less than 1 parking space per unit.

Key strategic priorities of relevance to the future development and role of Bromley Town Centre may be summarised as follows:

- promoting more intensive forms of development in areas well served by public transport
- Intensifying retail, services, employment, leisure and housing in town centres
- Promoting use and Improvements to public transport
- Sustainable, safe and well designed development
- Realising the value of open space
- Promoting high quality architecture and design
- Heritage conservation

*Accessible London: achieving an inclusive environment -
London Plan Supplementary Planning Guidance (SPG) April 2004.*

This provides detailed guidance on policies in the London Plan that relate to accessibility. The vision is to create an environment in London in which all people have equal, easy and dignified access to London's buildings, places and spaces.

Local Planning Policy

Bromley Adopted Unitary Development Plan (March 1994)

The Bromley Unitary Development Plan was adopted in March 1994 and covers the period up to 2001. The adopted UDP seeks to promote Bromley Town Centre as the Borough's main shopping, employment and cultural centre whilst seeking to protect its essential character and improve its environment. It includes a specific chapter on the town centre and sets out a broad vision for the future. Emphasis is placed on improving the quality of the environment for shoppers and visitors, promoting a high quality environment in the business areas of the town, widening the scope of cultural activities and promoting the development of opportunity sites to maintain the diversity of uses within the Town Centre.

The plan highlights the need to foster economic growth in Bromley, and maintain Bromley's contribution to London's continuing prosperity and a buoyant national economy, whilst preserving the character and vitality of its established town centres.

Its vision for Bromley Town Centre encompasses the promotion of its three major functions -shopping, employment and culture – by using the completion of the Glades, the relief road and pedestrianisation as catalysts for further improvements in the town centre whilst ensuring its character is preserved.

The main UDP policies affecting the town centre are:

Shopping

- **Policy B/S 3** seeks to limit the conversion of A1 uses to A2 and A3 uses at ground floor level in the 'principal shopping frontages'.
- **Policy B/S 4** seeks to maintain a balanced mix of A2 and A3 uses within the Glades Shopping Centre
- **Policy B/S 5** seeks to control the balance of A2 and A3 uses within 'secondary shopping frontage' areas.

Employment

- **Policy B/O 1** states that: “The Council will restrict development proposals involving additional office floorspace to Opportunity Sites H, P and R as indicated on the Inset Proposals Map.

In considering proposals within these defined sites, the Council will require that:

1. the development would result in planning advantages, appropriate to the size and location of the proposal.....”
 2. the development would not detract from the amenity of adjacent residential areas;
 3. there would be no loss of other facilities appropriate to the strategic role of the town centre;
 4. car parking spaces are provided in accordance with the standards set out in Appendix V of the Plan;
 5. the proposal is in accordance with the provisions of the townscape policies of this Plan and does not exceed the limits given by the high building policy.
- **Policy B/O 2:** Proposals involving additional office floorspace on sites outside the appropriate opportunity sites will normally be resisted, except where:
 1. the proposal is for less than 2,000 sqm. of floorspace and lies wholly within an existing office area indicated on the Inset Proposals Map;
 2. the proposal is for additional office floorspace ancillary to another main use; or
 3. the proposal entails a minor development or change of use that would improve the supply of accommodation for small businesses...”

Housing

- **Policy B/H 1:** Within the housing areas defined on the Inset Proposals map the council will resist all proposals which involve changes of use or redevelopment for purposes other than housing.
- **Policy B/H 2** and **Policy B/H 3** relate to redevelopment or conversion of residential accommodation to other uses outside ‘housing areas’.
- **Policy BH 4** states that redevelopment of Opportunity Sites D, F, S and T will be required to include residential accommodation.

Transport

- **Policy B/T 1** : classification of roads
- **Policy B/T 2** : rear servicing of shopping frontages
- **Policy B/T 3** : pedestrianisation
- **Policy B/T 4** : quality of pedestrian environment
- **Policy B/T 5** : disability access
- **Policy B/T 6** : location of bus stops
- **Policy B/T 7** : improvement of rail services
- **Policy B/T 8** : provision of additional off-street car parking at appropriate locations
- **Policy B/T 9** : car parking standards for new development
- **Policy B/T 10:** commuted payments for parking

Landscape

- **Policy B/LOS 1:** to conserve existing open space and create further open space wherever practicable.
- **Policy B/LOS 2** the promotion of improved landscaped pedestrian links in key locations
- **Policies B/LOS 3, B/LOS 4 and B/LOS5:** to improve the street scene within the town centre

Townscape

- **Policy B/TS 1:** The Council will require new development to be of a high standard of design and layout and will ensure that:
 - 1) development respects the scale, form and materials of adjacent buildings; and
 - 2) development incorporates appropriate landscaping and tree planting and minimises the loss of existing trees; and
 - 3) development conforms with the appropriate guidelines, as set out in Appendices I and III.
- **Policy B/TS 2:** high buildings should not adversely affect the character of the town centre. Generally, buildings of over four storeys will only be considered appropriate in the area shown on the Inset Proposals Map. Policy B/ TS 3 seeks to preserve and enhance the character and appearance of Bromley Town Centre Conservation Areas.

Leisure

- **Policy B/L 1:** seeks improvements to existing cultural facilities and provision of new facilities,
- **Policy B/L 2:** resists the loss of leisure, recreational or cultural facilities
- **Policy B/L 3:** seeks to promote events, activity and entertainment in the town centre.

The Bromley Unitary Development Plan remains the adopted Development Plan until the adoption of the revised UDP. Given the advanced stage of the Second Deposit Draft, its policies must be considered in the context of the emerging UDP.

Second Deposit Draft Unitary Development Plan (September 2002)

The Second Deposit Draft Unitary Development Plan 2002 was published in September 2002. A Public Local Inquiry was completed on 15th April 2004. It is at an advanced stage of preparation and therefore represents a material consideration in the determination of planning applications. The Draft Unitary Development Plan 2002 covers the period up to 2016. The principal changes are:

- An increased emphasis placed on sustainable development including ensuring a mix of uses and that major trip generating development is accessible by a choice of means of transport and does not prejudice the vitality and viability of existing centres.- This is a running theme throughout the plan informing its economic, social and environmental objectives.
- The Second Deposit UDP defines primary and secondary shopping frontages, which are substantially unchanged from those in the adopted 1994 UDP. The only changes are the inclusion of premises at the north of Queen's Road on Widmore Road as secondary frontage and the frontage on Church Road between the High Street and Tetty Way changing from primary to secondary frontage.
- In comparison with the adopted 1994 UDP, the Second Deposit Draft UDP does not include specific policies on the location of future office development, or housing development. The 1994 designation of 'office areas' and 'housing areas' are not taken forward in the Second Deposit Draft.

The main UDP policies affecting the town centre are:

Policy S1 (Primary Frontages):

In primary retail frontages, as defined on the Proposals Map, the Council will only permit changes of use from retail (Class A1) to other uses where the proposal would:

- i. not harm the retail character of the shopping frontage;
- ii. generate significant pedestrian visits during shopping hours; and
- iii. complement the shopping function of the town centre; and
- iv. not create a concentration of similar uses; and
- v. have no adverse impact on residential amenity.

Policy S2 (Secondary Frontages):

In secondary retail frontages, as defined on the Proposals Map, the Council will permit changes of use from retail (Class A1) to other uses provided that:

- i. the use provides a service that complements the shopping function of the town centre; and
- ii. there is no adverse impact on residential amenity.

Policy S3 (The Glades):

Within The Glades Shopping Centre the Council will permit the change of use from retail (Class A1) use to professional & financial services (ClassA2) or food & drink (ClassA3), provided that the centre's primary retail function is not adversely affected

Policy S8 (Non-retail uses in shopping areas):

In retail frontages the Council will not normally permit uses that do not offer a service to visitors unless:

- i. there has been long term vacancy and a lack of demand for a retail or service use can be proven; and
- ii. the proposed use is in premises where it would not undermine the retail viability of the centre.

Policy S9 (Residential Accommodation):

The Council will only permit the change of use of ground floor premises in shopping areas to residential use where:

- i. the proposed use would not undermine the retail vitality and viability of the centre; and
- ii. the proposal would result in accommodation suitable for residential use; and
- iii. there has been long term vacancy and no demand for a commercial or community use.

Parking Standards

Revised parking standards have been derived in part from Regional Planning Guidance 3 (RPG3). The Second Draft Deposit UDP sets out the following standards for areas of high accessibility such as Bromley Town Centre.

Table 2: Parking Standards

Development Type (Use Class)	Parking Standard
Large A1 > 2,000 sq m	Determined by Transport Assessment
Medium A1 and A3	Operational requirement only
Small A1 and A3	Operational requirement only
Large A2/ B1/ D2	1:600 sq m
Medium A2/ B1/ D2	1:600 sq m
Small A2/ B1/ D2	Operational requirement only
Further Education	1 space per 10 staff and Travel Plan
Other Class D1 residential Class C1(Hotels) & Class C2 (Residential Institutions)	Determined locally on proposal merits
Residential Class C3 (Dwellings)	1:1
Affordable Housing	
1 bedroom	0.5:1
2 bedrooms	0.75:1
3 or more bedrooms	1:1

Key proposals are illustrated in Figure 1 and the principal objectives are summarised below.

Housing: To develop balanced and mixed communities and high quality sustainable residential development.

Transport: To promote alternatives to and reduce reliance on the private car for the benefit of all, bring points of origin and destination closer together, improve access to the town centres, and reduce pollution.

Jobs and the local economy: To consolidate and improve employment opportunities.

Town centres: To support the strategic role of Bromley Town Centre and sustain and promote the vitality and viability of town centres, ensuring the range and level of facilities are appropriate to the role and function of each centre in the hierarchy.

Community needs, benefits and services: To work with relevant agencies to secure provision of good quality facilities to meet the essential needs of the community.

Design and Conservation: To protect and improve the quality of the Borough's built environment and public areas and encourage high quality and sustainable design

Environmental Resources: To encourage efficient use of resources and minimise waste generation

Natural environment, Green Belt and Open Space: To protect, promote, enhance and actively manage the natural environment, green belt, metropolitan open land, green chain and urban open space and preserve good quality agricultural land.

Recreation, Leisure and Tourism: To improve quality and access to recreation and leisure facilities and safeguard existing and promote new tourist-related development in the borough

Implementation Benefits: To ensure appropriate social and environmental benefits are achieved through regeneration and new development and seek effective implementation of the plan by attracting the necessary resources

Key policy considerations are summarised below:

Housing

For sites within town centres of 0.4 Hectare or more, the Council will normally expect schemes for residential development not to exceed the existing density of the immediate surrounding area except on sites within town centres where the Council will normally expect schemes to achieve the following densities:

- 250 habitable rooms/ ha in areas of high public transport accessibility
- 175 habitable rooms/ ha in areas of moderate public transport accessibility

The accessibility levels will be calculated using the Transport for London PTAL Calculator Map. Bromley Town Centre has a high public transport accessibility level. New housing within the town centre will contribute to Bromley's overall housing target.

Jobs and the local economy

The Council's objective is to reduce unemployment, promote the development of e-commerce, improve skills and create competitive town centres. The town centre is one of the Borough's major employment centres and the main location for the Borough's office based businesses.

Transport

The second deposit draft UDP seeks to make the town centre an easier places to access via the widest range of transport modes and to accommodate the demands of cars for shopping and leisure visits. The objective is to capitalise on opportunities associated with better accessibility to the town centre, including the major benefits of the proposed Thameslink 2000 project. A redefinition of the routes from the North and South and the creation of gateways to the town centre on these routes (as well as at the railway stations) are key to achieving this aim.

Recreation, leisure and tourism

The second deposit draft UDP seeks to protect and enhance existing recreation and leisure facilities. In addition, it looks to secure the provision of and access to public open space within the town centre. The plan seeks to promote Bromley's as a destination for tourists and the development of hotels within the town centre.

Town centres and Shopping

The second deposit draft UDP seeks to support the strategic role of Bromley Town Centre as a Metropolitan Centre and the Borough's major shopping centre. The Glades Shopping Centre is regarded as an important complementary retail destination within Bromley. The plan promotes Bromley's role as a Metropolitan Centre and major shopping centre and seeks to ensure a balance of uses for people of all ages, incomes, and backgrounds.

Natural environment, Green Belt and Open Space

The promotion of high quality areas of open space is incorporated into the second deposit draft UDP. The council will resist proposals for built development in areas defined as Urban Open Space except where the development is related to the existing use or the development is small scale and supports recreational uses or children's play facilities on the site.

Community Needs, Benefits and Services

The second deposit draft UDP includes policies designed to support providers in maintaining and enhancing the availability and accessibility of the wide range of facilities in the borough. The UDP states that new health facilities,

In accordance with UDP policy, it will be necessary to meet the demands of an expanding population for community, educational, medical and other facilities in the town centre.

Environmental Resources

The second deposit draft UDP seeks to limit the environmental impacts of new developments and ensure that any impacts are mitigated. The quality of Bromley's environment is one of its major assets. A key requirement is to ensure that new developments within the town centre respect and enhance the local and wider environment. This means using sustainable building practices and optimising land use planning strategies to ensure points of origin and destination are close together.

Design and Conservation

A high standard of design and layout that is sensitive to the urban context is promoted in the second deposit draft UDP. At the same time, the preservation and conservation of the Borough's historic areas (including Conservation Areas) and buildings (Statutory and Locally Listed Buildings) is paramount. Within the Bromley Town Centre Conservation Area, proposals will be required to satisfy both the need for the preservation of the historic fabric and the requirement for a viable and thriving town centre.

Existing Supplementary Planning Guidance

SPG-1 General Design and principles

This document was adopted by Bromley Council in January 2004. It is designed to aid applicants in preparing planning applications to enable a rapid decision to be made by the authority. Applicants must be able to demonstrate that their designs have regard to relevant development plan policies and supplementary design guidance and are based on sound design principles. The need for a comprehensive description of the proposal and design statements for larger developments is also emphasized.

SPG-2 Residential Design Guidance

This document was adopted by Bromley Council in January 2004. It provides applicants with general advice on how to achieve contextually appropriate residential development and covers both extensions and alterations to existing properties and the development of new ones. It states that the onus is on applicants to demonstrate that their proposals have regard for relevant UDP policies and supplementary design guidance.

SPG 3 Bromley Town Centre Conservation Area Statement

This statement was adopted by Bromley Council in June 1999. It comprises a description of the Conservation Area and provides advice on how best to preserve its existing fabric and manage new development within its boundaries. Whilst emphasising the need to retain buildings that make a contribution to the Conservation Area, the statement emphasises that the aim of designation is not to preserve the area in aspic but to encourage development that preserves or enhances the character and appearance of the Conservation Area.

DEVELOPMENT SITES

UDP Proposal Sites

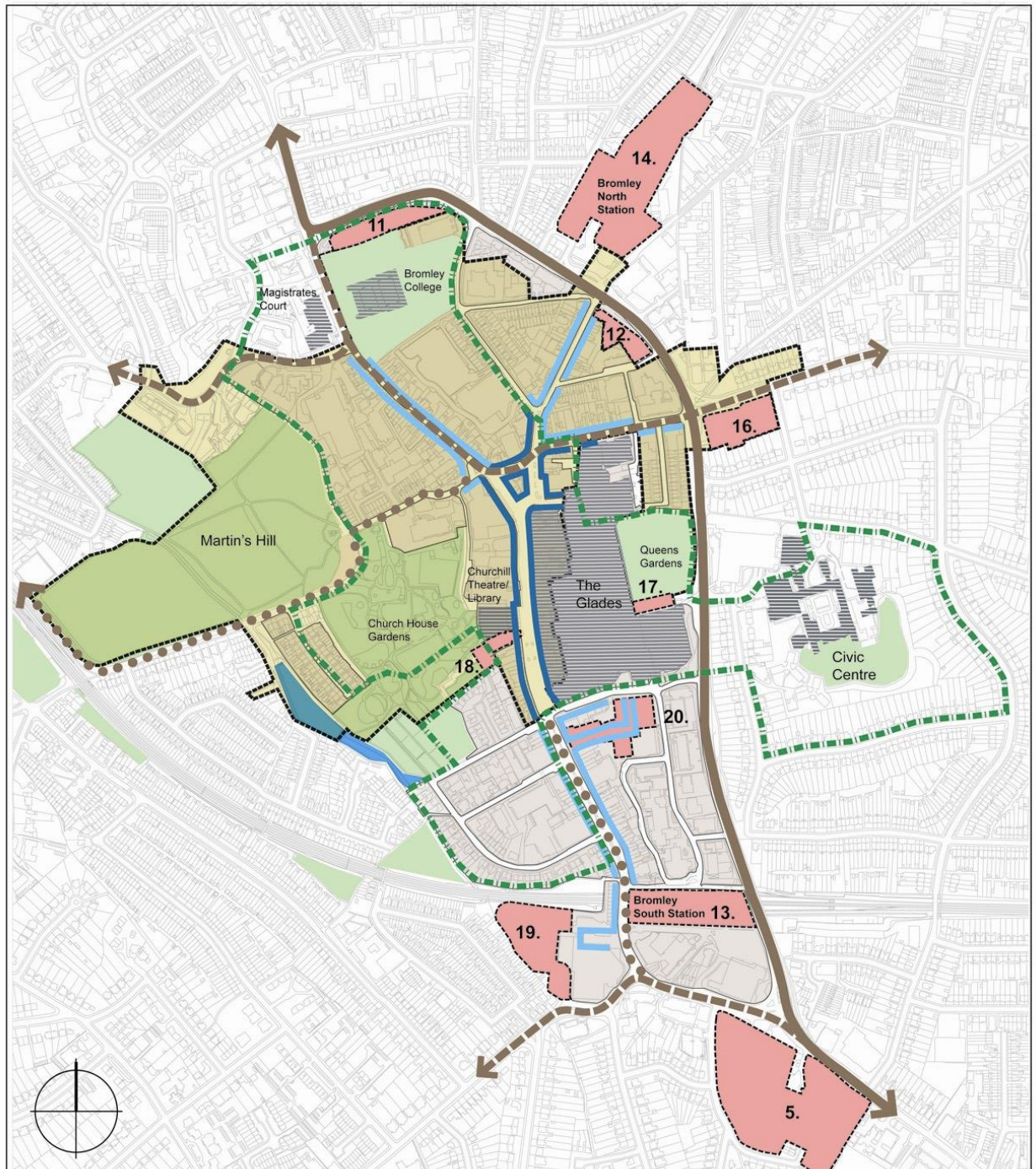
The Second Deposit UDP includes a number of proposal sites within the town centre. These are summarised in Table 1 and the location of these sites is illustrated in Figure 1.

The Inspector has made recommendations in response to representations received in respect of the proposals sites and these are summarised in Table 2. The Council is currently considering the Inspector's recommendations and will publish the changes it proposes to make to the Plan as post-Inquiry modifications. Development proposals will be considered in the context of the UDP policies.

Planning applications for proposal sites will be considered in relation to policies and proposals in the Second Deposit Draft UDP and broader policy considerations set out in PPS6 and the London Plan.

In the event of other sites coming forward in advance of the AAP, development proposals will be considered in relation to planning policy, criteria for assessment of development proposals set out below and their contribution to the overall vision for Bromley town centre.

Figure 1 Planning Policy Context



- | | | |
|-----------------------------------------------------------|--------------------------------------|---------------------------|
| Figureground | Primary shopping frontage | Strategic secondary roads |
| Proposal sites identified in the second draft deposit UDP | Secondary shopping frontage | District secondary roads |
| Existing parks/ open spaces | Areas of archaeological significance | Local distributor roads |
| Conservation area | | |

Bromley- Planning Context



Table 2: Proposal Sites (Second Deposit Draft UDP)

Site Ref	Included in 1994 UDP	Location	Current Use/Ownership	Proposals	Inspector's Recommendations (February 2005)
11	Yes	Tweedy Road/ London Road	Vacant (LBB)	Additional housing and improved landscaping	No comments
12	Yes	Tweedy road/ South Street	Vacant (LBB)	Office accommodation for small businesses	No comments
13	Yes	Bromley South Station	Railway station (Network Rail)	New railway station, improved ticket facilities and mix of uses	Agreed
14	Yes	Land rear of Bromley North Station	Car Park (Network rail)	Provision of additional housing	Recommend incorporation of existing bus terminal or provision of alternative location
16		Police Station/ shop units/ First Church of Christ Scientist, Widmore Road	Police station and offices, church (Private)	Appropriate residential and/ or commercial reuse of listed church and locally listed police station	Recommend modification to enable a mixed use scheme to locate on site with appropriate mix of residential and commercial re-use of listed buildings
17		Terrace on south side of Queens Gardens	Underused pedestrian/ garden area (private)	Retail/ café/ restaurant uses which will compliment Queens Garden, Pavilion and the Glades	Agreed
18		Churchill Theatre	Underused pedestrian area (LLB)	Leisure/ cultural facilities which compliment the town centre	Recommend deletion of Proposal Site – additional leisure facility linked to theatre desirable but should not be at expense of spaces that contribute to historic and visual interest of conservation area
19		Westmoreland Road Car Park and 1-9 Simpsons Road	Car park and retail units	Retain town centre car parking and provide comprehensive development scheme including bus interchange, residential, retail, offices and leisure use	Agreed - mixed use development supported
20		The Mall	Retail (Private)	Upgraded retail environment including leisure facilities which complements the town centre	Agreed

Criteria for the Assessment of Development Proposals

The Area Action Plan will be prepared in accordance with the guidance set out in PPS6 Planning for Town Centres and will provide the framework for the growth and development of the town centre. It will, however, be necessary for the Council to consider planning applications within the context of existing planning policy during preparation of the AAP.

In determining planning applications which come forward in advance of the AAP, consideration will be given to national, regional and local planning policies. In particular, the key considerations for assessing proposed developments set out in PPS6 will be taken into account.

These considerations will apply to all proposals relating to main town centre uses for:

- new development
- redevelopment of existing facilities
- extensions to existing facilities
- changes of use involving development renewal of extant planning permissions
- applications to vary or remove planning conditions

The Council will require applicants for development within the town centre to demonstrate:

- the need for development
- that the development is of an appropriate scale
- that there are no more central sites for the development
- that there are no unacceptable impacts on the existing centres
- that locations are accessible

The Council will assess planning applications on the basis of relevant planning policy, the above key considerations and the evidence presented, relevant local issues and other material considerations. As a general rule, the development should satisfy all these considerations.

Assessing the need for development

Need must be demonstrated for any application for a main town centre use which would be in an edge of centre or out of centre location and which is not in accordance with the up to date development plan document strategy. Consideration will be given to quantitative and qualitative need.

Securing the appropriate scale of development

The scale of development should relate to the role and function of the centre.

Applying the sequential approach to site selection

The sequential approach should be applied to all development proposals for sites that are not in the existing town centre nor allocated in the UDP. In selecting sites, all options in the centre should be thoroughly assessed before less central sites are considered. As part of this exercise, it is important to explore whether specific parts of a development could be operated from separate, sequentially preferable sites. Where it is argued that otherwise sequentially preferable sites are not appropriate for the particular development proposed, applicants should provide clear evidence why such sites are not practicable alternatives in terms of availability, suitability and viability.

Assessing Impact

Impact assessments should be undertaken for any application for a main town centre use which would be in an out of centre or edge of centre location and which would not be in accordance with the up to date development plan strategy.

In assessing sites, the Council will consider the impact of the proposal on the vitality and viability of existing centres including the likely cumulative effect of recent permissions, developments under construction and completed developments.

The Council will consider the impact of the development on the town centre taking into account:

- **the extent to which the development would put at risk the spatial planning strategy for the area**
- the likely effect on future public or private sector investment needed to safeguard the vitality and viability of the centre
- the likely impact of the proposed development on trade/ turnover and on the vitality and viability of the centre
- changes to the range of services provided by the centre
- likely impact on the number of vacant properties in the primary shopping area
- potential changes to the quality, attractiveness, physical condition and character of the centre and its role in the economic and social life of the community
- the implications of proposed leisure and entertainment uses for the evening and night time economy of the centre

Ensuring locations are accessible

In considering proposed new developments, the Council will consider:

- i) The need for accessibility by a choice of means of transport - Developments should be accessible by a choice of means of transport including public transport, walking, cycling and the car. The Council will assess the extent to which applicants have taken into account PPG13 Transport for example, through the preparation of accessibility analyses, transport assessments, travel plans and the promotion of opportunities to reduce car journeys and contributions to improve access, traffic management and parking.

- ii) The impact on car use, traffic and congestion - in assessing new developments, the Council will consider whether the proposals will have an impact on the overall distance travelled by car and the effect on local traffic levels and congestion after public transport and traffic management measures have been secured.

Other Material Considerations

Material considerations may include:

- Physical regeneration
- Employment
- Economic growth
- Social inclusion

DESIGN GUIDELINES

Urban design is about making places for people- it includes the way places work and matters such as community safety; how places look and the connections between people and places, movement and urban form.

The Council will require all development proposals coming forward to be of the highest design quality and contribute to the overall vision for Bromley town centre.

Design Principles

The objective is to create a safe and attractive living environment that provides a sense of identity and place to which local communities can relate and in which they can have pride. The Council seeks the creation of a high quality built environment for all and seeks to secure a high quality of townscape, urban form, building design and urban spaces through the use of architecture, urban design and landscape design. Based on the key characteristics of successful urban areas identified in the DETR (now superseded by the ODPM)/ CABI publication 'By Design', the principles of good urban design which will guide future change and development in the area may be summarised as follows:

Character – A place with its own identity

Continuity and Legibility - A place that is easy to understand and where public and private spaces are clearly distinguished

Quality Public Realm - A place with high quality, attractive and successful public spaces and streets

Ease of Movement - A place that is easy to get to and move through

Sustainability – A viable, successful place which minimises resource consumption

Adaptability - A place that can change easily in response to changing requirements

Diversity - A place which offers variety and choice

The Council will also apply the guidance set out in Planning for Town Centres: Guidance on Design and Implementation Tools in considering applications for new development (March 2005). The

development will be required to satisfy the following design principles:

Development should:

- normally be orientated so that it fronts the street;
- respect building lines of the existing urban environment and where appropriate, build up to the edge of the cartilage;
- maximise the amount of street frontage;
- avoid designs which are inward looking and which present blank frontages;
- provide level access from the public realm; and
- in the case of development in edge of centre locations, provide good pedestrian access to the centre.

Developments with innovative layouts which maximise the use of a site and where appropriate make use of multiple levels should be encouraged having regard to local context.

Roof scape design should be carefully considered within the wider context with any adverse visual impact of rooftop servicing minimised.

Landscape

The treatment of hard and soft landscaping within a development is of considerable importance and should be considered from the outset of the design process to ensure that it complements the architecture of proposals and improves the overall quality of the existing townscape. Townscape views into and out of larger sites should also be carefully considered from the start of the design process.

Parking

Car parking and service areas should be carefully located within a development so as to minimise visual impact. Car parking should normally be located to the rear, underneath or where appropriate above new development. Where surface car parking is proposed, this should be conceived within the overall landscaping proposals and link into the wider area. Multi-storey car parking should also be carefully designed and be well integrated with its surroundings. Pedestrian access, security, lighting, signing and publicity, management and maintenance should all be designed sensitively to minimise the level of light pollution to the surroundings

Public realm and access

The Council's objective will be to create high quality streets and public places. The Council will promote the rationalisation of street furniture, signage and paving to improve the streetscape and produce high quality, accessible and coherent pedestrian environments. Pedestrian links between the primary shopping area and the rest of the town centre will where possible be strengthened.

In considering development proposals, the Council will seek to improve the quality, convenience and safety of access by foot, bicycle and public transport and integrate proposals to improve accessibility with improvements to traffic management and the management of car parking.

The following table provides design guidance for new development proposals coming forward on the proposal sites identified within the Second Deposit Draft UDP.

Table 3 Proposals Sites: Design Principles

Site Ref	Location	Proposals	Design Principles
11	Tweedy Road/ London Road	Additional housing and improved landscaping	<ul style="list-style-type: none"> ▪ Development to be built to back of pavement with primary windows and doors fronting onto the street ▪ As a general principle development to be a minimum of 3 storeys ▪ Opportunity for higher buildings to recognise strategic location at northern gateway subject to impacts and integration with surrounding area ▪ Development to be sensitive to the character and scale of surrounding buildings ▪ High quality landscaping and public realm
12	Tweedy road/ South Street	Office accommodation for small businesses	<ul style="list-style-type: none"> ▪ Development to be built to back of pavement with primary windows and doors fronting onto the street ▪ As a general principles development to be a minimum of 3 storeys ▪ Development to be sensitive to the character and scale of surrounding buildings ▪ Active use to be provided at ground floor level adjacent to East Street ▪ High quality landscaping and public realm
13	Bromley South Station	New railway station, improved ticket facilities and mix of uses	<ul style="list-style-type: none"> ▪ Opportunity for higher buildings to recognise strategic location at southern gateway subject to impacts and integration with surrounding area ▪ Development to be of a high architectural quality ▪ High quality landscaping and public realm
14	Land rear of Bromley North Station	Provision of additional housing	<ul style="list-style-type: none"> ▪ Integration of transport facilities with a mix of associated commercial facilities and residential uses ▪ Protected waiting area with good facilities for passengers ▪ New public space with high quality landscaping and public realm ▪ New public space to be bordered by active frontages to animate and inform the public realm ▪ Integrated multi-storey car parking maximise area of land for development ▪ Opportunity for higher buildings subject to impacts and integration with surrounding area

Site Ref	Location	Proposals	Design Principles
16	Police Station/ shop units/ First Church of Christ Scientist, Widmore Road	Appropriate residential and/ or commercial reuse of listed church and locally listed police station	<ul style="list-style-type: none"> ▪ Development to be sensitive to the character and scale of listed buildings and surrounding buildings ▪ Development to contribute to character and appearance of street frontage
17	Terrace on south side of Queens Gardens	Retail/ café/ restaurant uses which will compliment Queens Garden, Pavilion and the Glades	<ul style="list-style-type: none"> ▪ New development to provide active frontages at terrace level to maximise, animation, views and solar gain ▪ Development to provide protection from the elements while maintaining visual permeability ▪ Easy access to be provided from terrace down to garden to provide integration between the Glades, High Street and Queens Gardens ▪ Good connections to be provided between the Civic Centre and The Glades Shopping Centre ▪ High quality landscaping and public realm
18	Churchill Theatre	Leisure/ cultural facilities which compliment the town centre	<ul style="list-style-type: none"> ▪ High quality public realm to provide setting for the existing Theatre and a focal space for the town centre ▪ Active ground floor uses to be provided to animate the public space ▪ Increase width of link from High Street to create a stronger visual and physical connection between High Street and Church House Gardens
19	Westmoreland Road Car Park and 1-9 Simpsons Road	Retain town centre car parking and provide comprehensive development scheme including bus interchange, residential, retail, offices and leisure use	<ul style="list-style-type: none"> ▪ New development to provide active frontages at ground floor level fronting onto the street ▪ Development to be sensitive to the character and scale of surrounding buildings ▪ High quality pedestrian connections to be created to the High Street ▪ Multi-storey car park to be sensitively designed and integrated within the development ▪ High quality landscaping and public realm
20	The Mall	Upgraded retail environment including leisure facilities which complements the town centre	<ul style="list-style-type: none"> ▪ Improved linkages and integration with High Street ▪ Use of lighting to enhance the appearance of the development and improve security ▪ High quality landscaping and public realm