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## **DEVELOPMENT CONTROL COMMITTEE**

**Meeting to be held on Tuesday 31 August 2010**

Please see the attached appendices marked "to follow" on the published agenda.

**APPENDIX TO DRAFT BROMLEY TOWN CENTRE CONSERVATION AREA  
ITEM 10 STATEMENT 2010 (Pages 3 - 44)**

**APPENDIX TO PLANNING INSPECTORATE'S REPORT ON THE EXAMINATION INTO  
ITEM 11 THE BROMLEY TOWN CENTRE AREA ACTION PLAN (Pages 45 - 84)**

*Copies of the documents referred to below can be obtained from  
[www.bromley.gov.uk/meetings](http://www.bromley.gov.uk/meetings)*

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# Bromley Town Centre Conservation Statement 2010

DRAFT

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## **Introduction**

Conservation Areas are parts of our local environment with special architectural or historic qualities. They are created by the Council, in consultation with the local community, to preserve and enhance the specific character of these areas for now and future generations.

This document has been prepared for the following purposes:

1. To comply with the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 69(1) states that a Conservation Areas are “areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.”
2. To provide a detailed appraisal of the area’s architectural and historic character.
3. To provide an overview of planning policy and propose management guidelines on how this character should be preserved and enhanced in the context of appropriate ongoing change.

# 1. Appraisal

## Overview

Bromley Town Centre is located within the London Borough of Bromley and is a former market town on the south eastern edge of London approximately 10 miles from the centre of London. Bromley Town Centre is the principal retail and commercial centre in the borough and contains the administration centre for the London Borough of Bromley.

The conservation area designation covers the central core of the town centre with a central spine covering the High Street, Market Square and the lower part of London Road. To the north and east it includes College Slip, East Street, West Street, North Street and parts of Widmore and Tweedy Road / Kentish Way. To the south it extends as far as Elmfield Road. To the West it extends into the Ravensbourne Valley / Shortlands and includes Church Road, Glassmill Lane, Martin's Hill and parts of Beckenham Lane.

Bromley Town Centre has two railway stations, Bromley South and Bromley North. Bromley North Station is located within the Conservation Area.

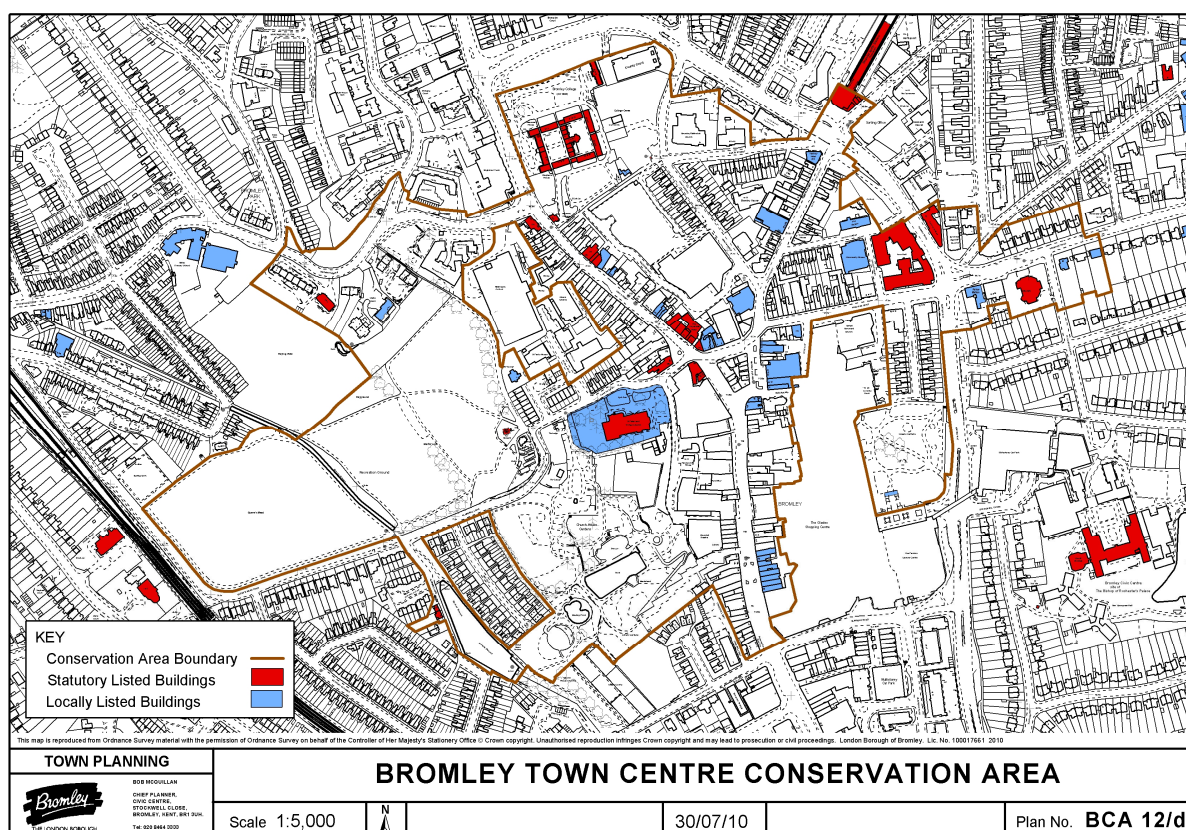


Figure 1

## **DESIGNATION**

The Bromley Town Centre Conservation Area was first designated in 1985. At that time the designation was focused around the historic core of Market Square and the north part of the High Street. Subsequent extensions have enlarged the Conservation Area.

## **LISTED BUILDINGS IN BROMLEY TOWN CENTRE CONSERVATION AREA**

There are a number of statutory and locally listed buildings within the Bromley Town Centre Conservation area. The statutory and Locally Listed Buildings are illustrated in figure 1.

### **Statutory Listed Buildings:**

#### **Grade I Listed**

- Gates at Bromley College
- Bromley College

#### **Grade 2\* Listed**

- War Memorial Martins Hill

#### **Grade 2 Listed**

- Parish Church, Church Road
- Royal Bell Building 171-177 High Street
- 179 High Street
- 181-183 High Street
- 223-225 High Street
- Star and Garter Public House 227 High Street
- Swan and Mitre Public House
- The Partridge Public House
- Sheppards College
- Bromley North Railway Station
- Former Town Hall
- Former Public Library
- First Church of Christ Scientists
- Former Town Hall extension
- Iron Gates and Piers Queens Gardens
- 1-4 Pixfield Court Beckenham Lane
- Parish Church, Church Road
- K6 Telephone Kiosk, College Slip



## **LOCALLY LISTED BUILDINGS**

The locally listed buildings are considered to make a positive contribution within the Bromley Town Centre Conservation area and are as follows:

- 5 Beckenham Lane
- 11 College Slip
- Boundary Post, College Slip
- Former Post Office, 3 East Street
- 95 - 109 High Street (odds)
- 157 High Street
- 189, 191 & 193 High Street
- 215 High Street
- Cast Iron Water Pump, Market Square
- 1, 2 & 34 & 5 Market Square
- 15 & 16 Market Square
- 20-25 (odds) Market Square
- 27 & 28 Market Square
- Zucchi Fashions Market Square

## HISTORICAL DEVELOPMENT

Bromley or Broomleigh means the heath where the broom grows. It is believed that the Manor of Bromley was a Royal gift to the Bishop of Rochester in the 8th Century. Evidence in the Domesday Book of 1086 suggests a population of around three hundred people. By the mid 1200's, Bromley had become a small town with its own church and priest and a weekly market. In 1477, a Royal charter granted Thursday as market day (which it remains).

Bromley grew slowly in the mediaeval period. By the 17<sup>th</sup> Century the population is estimated to have been around 700 and doubled in the 18<sup>th</sup> Century. The town's most impressive buildings from this early period are at Bromley College, a development of almshouses on the London Road at the northern end of the High Street. Bromley College is grade 1 Listed and was founded in 1666.

Bromley developed a number of coaching inns due to being located on the coaching route to Hastings. Many of the old inn names survive today, often in rebuilt premises, including The Royal Bell, The Swan and Mitre, The Compass (formerly the Three Compasses), The Greyhound and The Star & Garter.

In 1811 the town's population was nearly 3,000 and it was at that time served by a timber framed 18<sup>th</sup> Century Market House. During the following decades the town experienced little change. Bromley Town extended as far north as Bromley College and as far south as the location of today's Central Library tower. The parish church was located to the west of the town and development extended only a short distance along Widmore Road to the east. Market Square was bypassed in 1832 by a new section of road which joined the north and south parts of the High Street so as to avoid Market Day traffic congestion.

The 1840s was a period of decline in Bromley. The sale of the Bishop of Rochester's Palace to a private owner (Coles Child) and the subsequent removal from the town of the patronage of the Bishop of Rochester had an adverse impact on local trade. By 1851 the population had fallen by 200 to 4,100 and the Market House had closed, the future of Bromley looked uncertain.

The railways extended to Bromley around 1860 which allowed the town to expand and in time the area developed into an area of middle class suburbs. Coles Child who bought the former Bishop's Palace for his private residence replaced the old Market Hall with a new structure in the 1860s (now demolished).

It was in these later decades of the 19<sup>th</sup> Century that the town began to expand and renew itself. Bromley's outskirts, which were traditionally surrounded by pasture and arable land and gentry houses, gave way to new suburban streets. The High Street began to extend south to meet the new Bromley South Railway Station with a mixture of villas and commercial premises. One remaining villa exists on the lower section of the High Street; it is located at 98-102 High Street, Bromley. However, its ground floor has been substantially altered and only reads as a villa from above fascia level.

East Street, West Street, South Street and North Street all date from the late 19<sup>th</sup> century. The area consists predominantly of two storey buildings. Widmore Road and East Street contain mainly commercial properties and lead to Bromley North Railway Station (opened 1878). North Street, West Street and Queen's Road contain residential properties. This area of Victorian town extension also retains a number of important civic / government buildings, which reflect the transition from market town to suburb. These include the former Post Office in East Street, the Former Local Board Offices in East Street (1875), the Former Fire Station, West Street and the Former Drill Hall (now O'Neills) in East Street

Commercial buildings often replaced old vernacular properties in the mid to late 19<sup>th</sup> Century. These replacements were often carefully considered and ornately detailed. Some of these include 95-109 High Street, Bromley, 157 High Street / 27 & 28 Market Square, Bromley, 215 & 217 High Street, Bromley, 81 & 183 High Street and 180-184 High Street.

A gas supply was established in 1837 and was followed by an electricity supply from 1898. Electricity was generated in a power station at Walter's Yard. The modernisation of Bromley allowed for its transformation from a small market town to a busy suburban centre. As such, most of the housing on the High Street and Market Square was converted to commercial use during that period.

The town continued to expand during the late Victorian and Edwardian period. During this time a number of historic inns were rebuilt in an ornate and grander style retaining their historic names. Surviving examples include the Star & Garter at 223-227 High Street, the Royal Bell at 171 High Street, the Compass at 10 Widmore Road and the Railway Hotel in East Street opposite Bromley North Station. Some new public houses were also established.

By 1894 Bromley had become an Urban District and around this time a node of 'Civic' buildings developed around Widmore Road, South Street, Court Street and Tweedy Road. These buildings include the Former Library & Arts School, Tweedy Road; the Former Police Station, Widmore Road, the Former Town Hall, Tweedy Road, the Former Town Hall Extension, Widmore Road, the Former Magistrates Court, South Street, the Fire Station, East Street and the First Church of Christ Scientist, Widmore Road. Provision was also made for public parks and open spaces during the 19<sup>th</sup> Century.

The area now covered by the conservation area saw little change in the decades leading up to the Second World War. However, parades of shops and large individual stores were built on redeveloped sites. It was at this time that the old Market Hall was demolished and the market moved to its current site outside the conservation area (adjacent to Bromley North Station). The Art Deco inspired department store at 162-178 High Street (Medhurst's) was erected (year) ??? and the Odeon Cinema was built in the 1930's on the northern section of the High Street and was one of three cinemas in the town at the time.

During the Second World War the town centre sustained extensive bomb damage. The greatest loss was the mediaeval Parish Church of Peter & Paul on Church

Road. The current parish church is a post-war replacement which retains the original 13<sup>th</sup> Century tower, a lych gate and a brick and flint churchyard wall.

Major redevelopment in the last decades of the 20<sup>th</sup> Century has brought positive change to the town centre. Walter's Yard was redeveloped to the northeast, the Sainsbury's supermarket and its flank to College Slip landscaped and enhanced, the construction of Kentish Way allowed the central section of the High Street, within the conservation area to be pedestrianised. The Glades shopping centre, a very large development, has been well integrated into the town centre complementing rather than competing with the traditional grain and pattern of the High Street.

## **HISTORIC MAPS / ROUTES**

The principal historic route through Bromley is the High Street, which forms part of the historic coaching road from London to Hastings. The High Street is comprised of two parts (north and south) which meet at Market Square at different angles. The Market Square is strategically placed where this north/south route is crossed by Church Road/Widmore Road linking Bromley to Beckenham to the West and Chislehurst to the east.

The historic maps of Bromley illustrate the development of the town and clearly show the main east/west and north/south roads into Bromley. Bromley College is shown to the north of the Town Centre and the parish church is shown to the west of the town centre. The historic street plan of the Bromley Town Centre is clearly recognisable today.

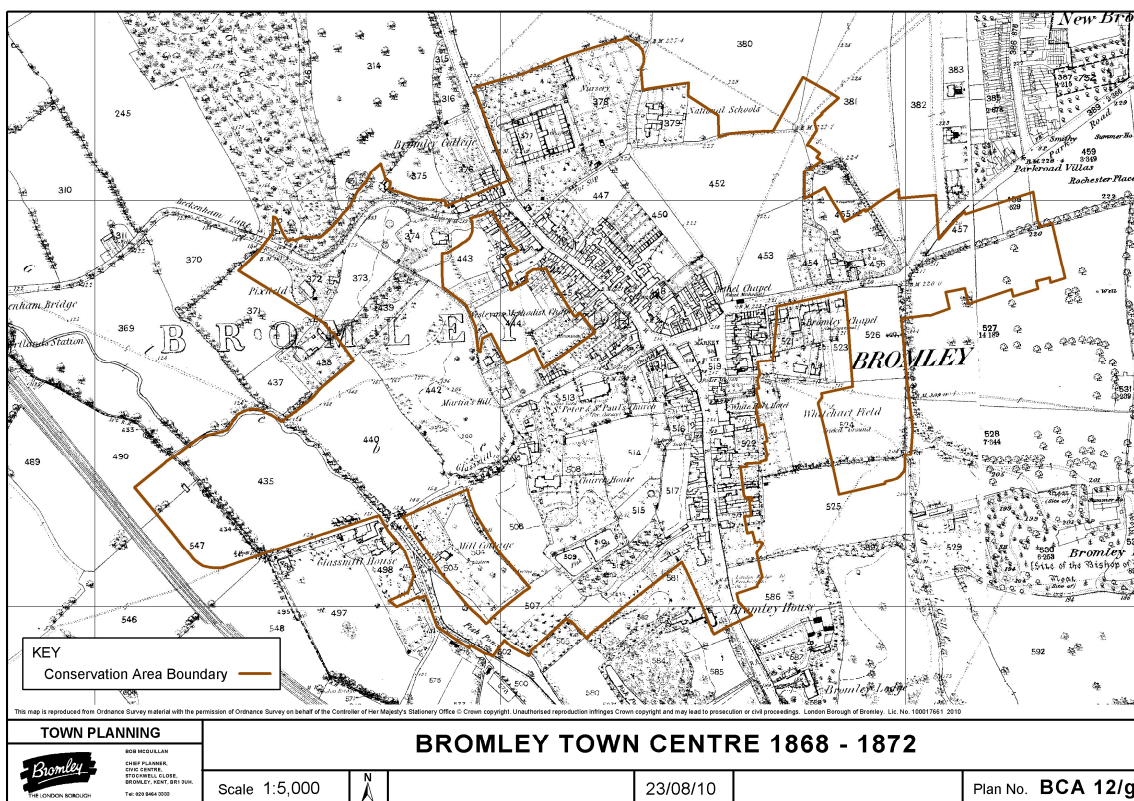


Figure 2

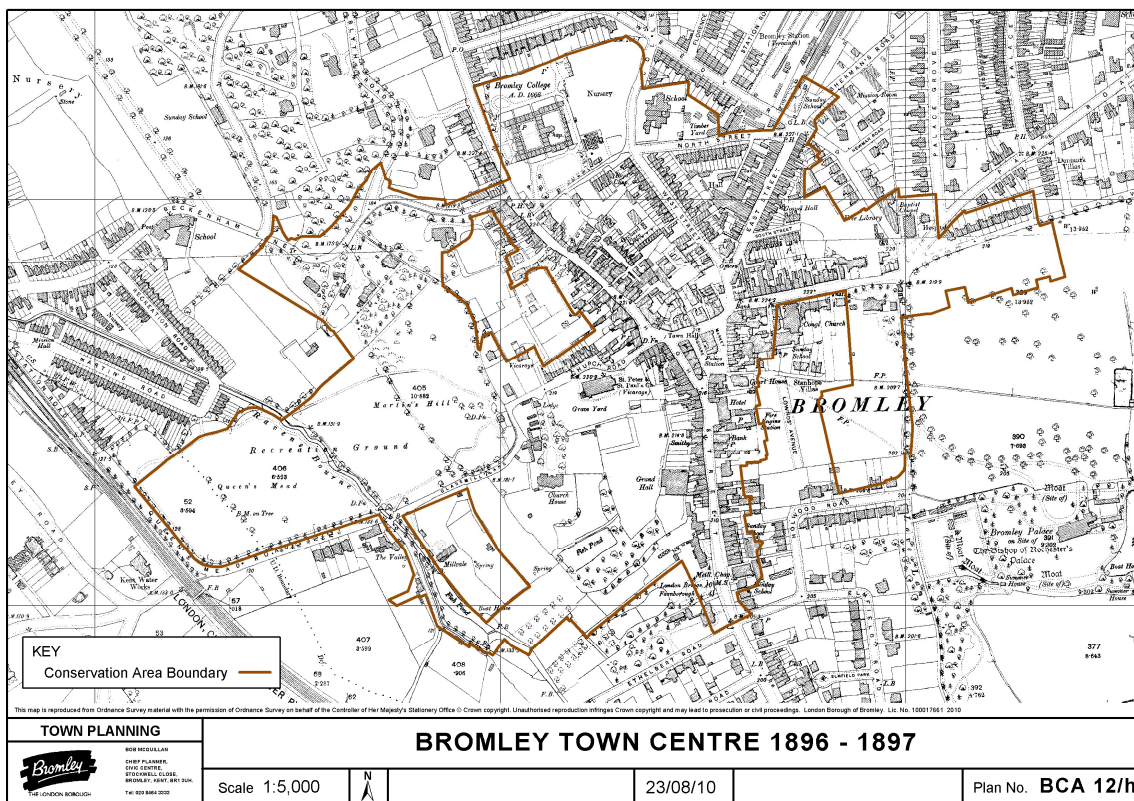


Figure 3

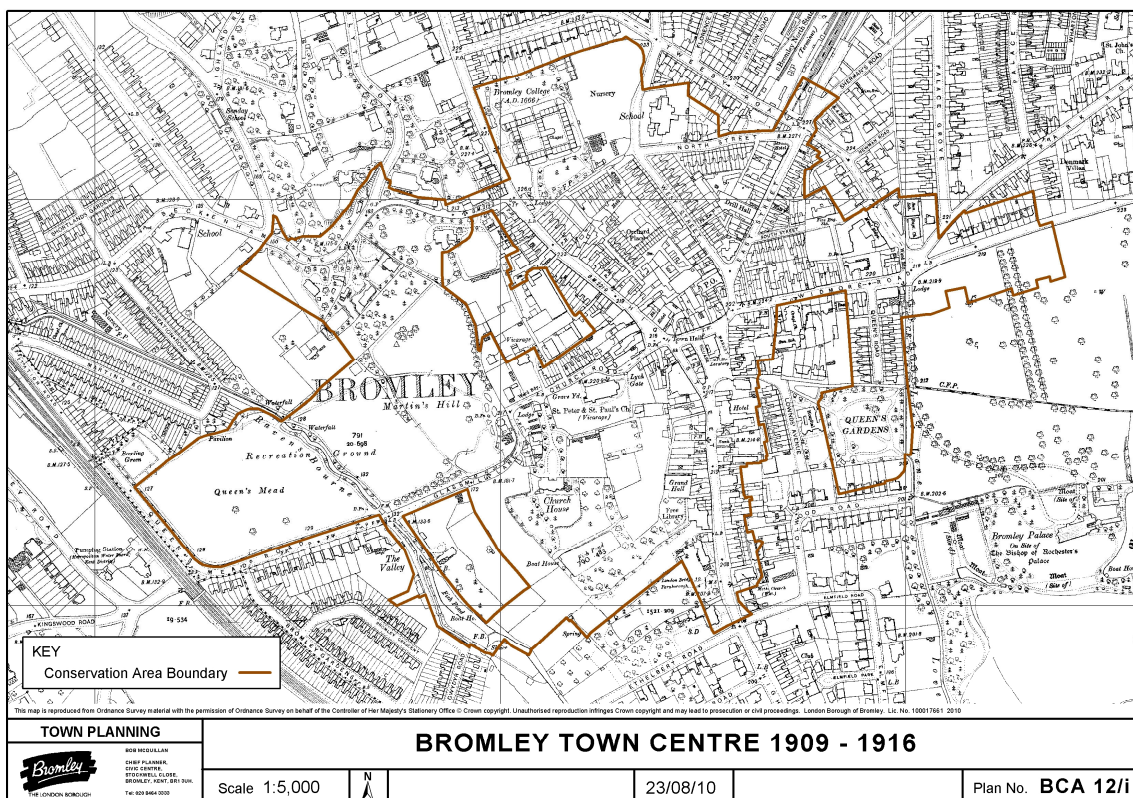


Figure 4

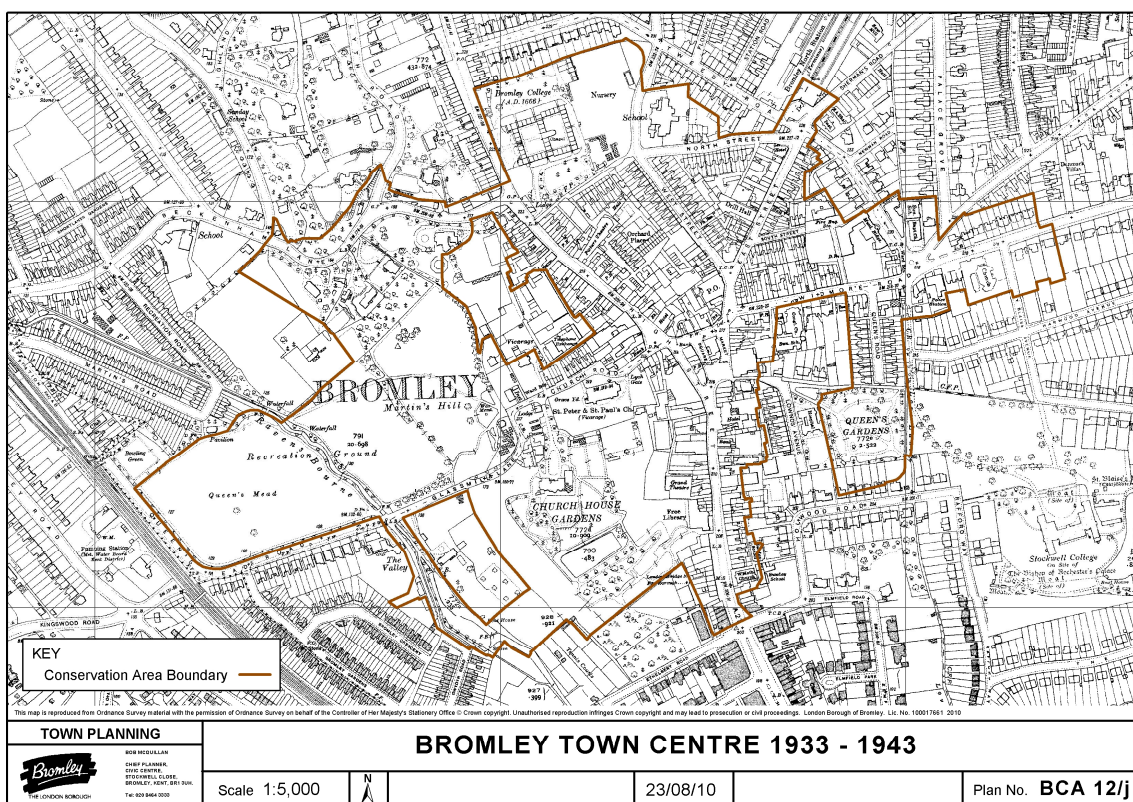


Figure 5

The commercial success of Bromley Town Centre altered the character of Bromley as a market town. The Glades shopping centre was completed in 1991 and the High Street was pedestrianised in the early 1990s to accommodate the popularity of Bromley as a commercial centre.

Pedestrianisation of the High Street, was facilitated by a bypass road - Kentish Way which was constructed in the early 1990s to bypass the town centre. It is a continuation of the A21. The creation of Kentish Way and the Glades Shopping centre caused the town centre to change considerably with many houses, churches and streets being demolished. The Queens Gardens were reduced in size and the Bishops Palace/Bromley Civic Centre was severed from the town.

## TOPOGRAPHY

The Bromley Town Centre Conservation Area comprises a former hilltop settlement built on a plateau. The contours rise steeply up Martins Hill from the Ravensbourne Valley to the Bromley Town Centre. The Ravensbourne River is located to the east of the Conservation Area.

Two of the open spaces are located within the steepest parts of the Town Centre, Martins Hill and the Church House Gardens.

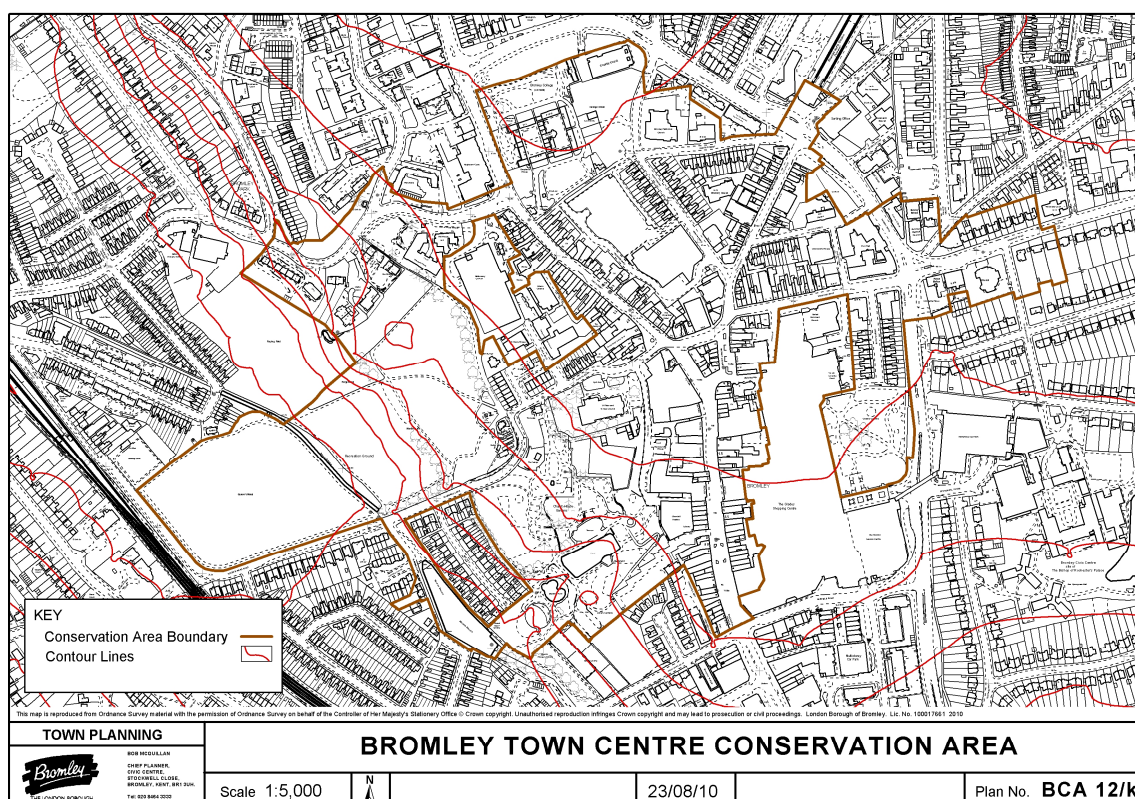
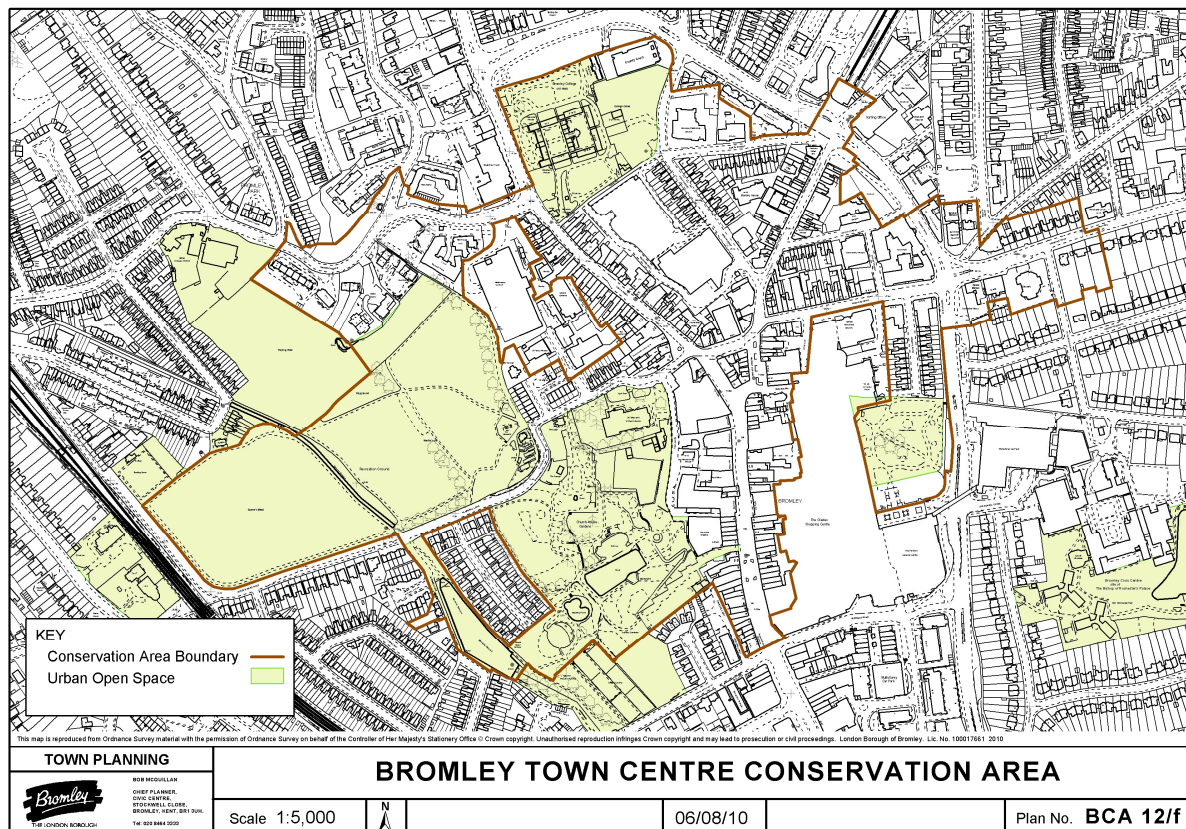


Figure 6: Topography

## URBAN OPEN SPACE

The Town Centre of Bromley has a number of green spaces which are illustrated below in figure 7.



**Figure 7: Urban Open Space**

These spaces are as follows:

**Bromley College.** This area is a mix of public and private open space. The public area is located to the east of the college.

**Martins Hill.** This area is public open space and used for sports as well as a pedestrian link from Shortlands Station to the northern end of the High Street.

**Church House Gardens.** This area of public open space is extensively landscaped, has a music bowl, lodge and bee wall. The gardens have direct but not well integrated links to the pedestrianised High Street. The Church House Gardens were once the private grounds to Church House, which was destroyed during WW2.

**Queens Gardens.** This area of public open space is well used as it has direct links to the Glades Shopping Centre and forms part of the pathway from the Bromley Civic Centre to the High Street. The Queen's Gardens were formerly called White Hart Field, and were given to the town in 1897 by Mr Coles Child who owned the former Bishop of Rochester's Palace (now within the grounds of the Bromley Civic Centre) at the time.



Palace Gardens: This area of public open space is located to the rear of the Bromley Civic Centre and across the A21 Kentish Way from the main town centre and once formed part of the grounds to the Bishop of Rochester's Palace.

### AREA OF ARCHAEOLOGICAL SIGNIFICANCE

The Area of Archaeological Significance within the Bromley Town Centre roughly follows the boundaries of the Conservation Area and covers the mediaeval core of Bromley including the former Bishop of Rochester's Palace to the east of the High Street, the parish church with mediaeval remains to the west of the High Street and Bromley College (established in 1666) to the north of the High Street.

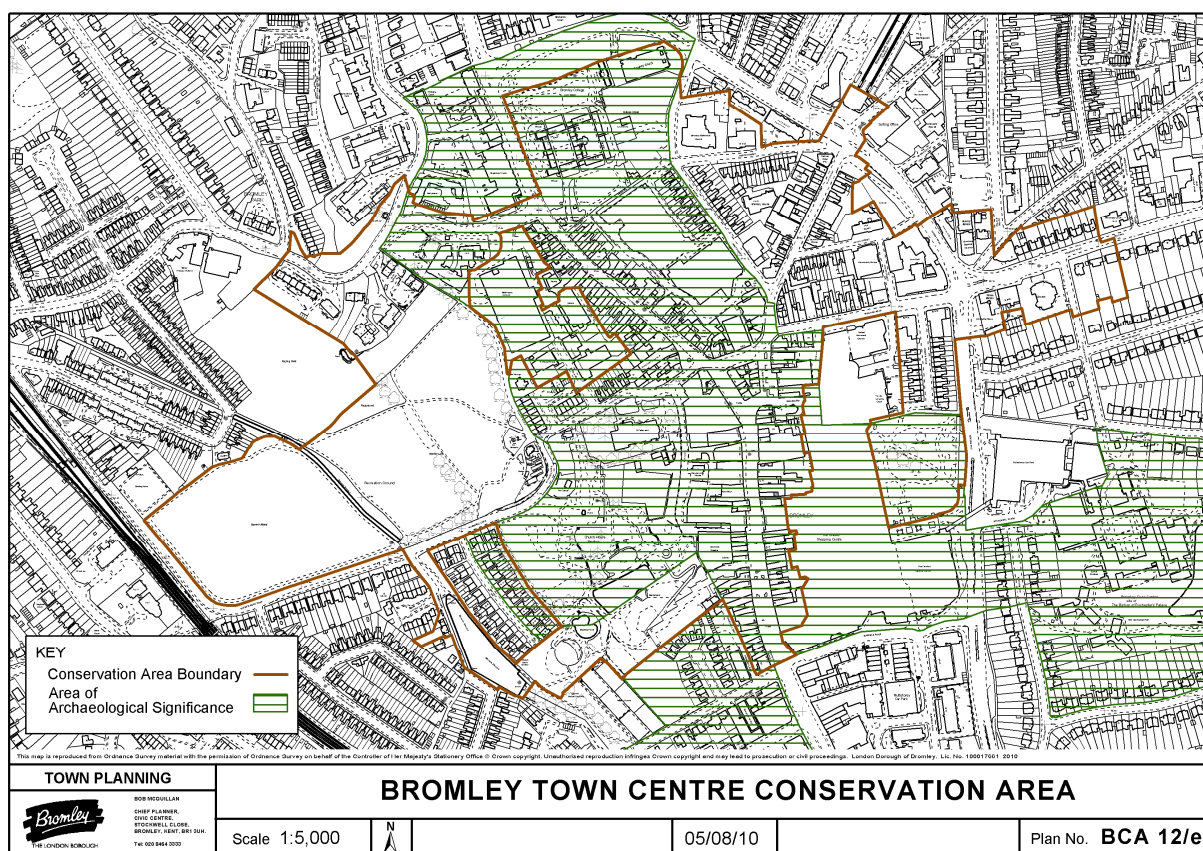


Figure 8: Area of Archaeological Significance

## **CHARACTER AREAS**

The Bromley Town Centre Conservation Area encompasses the historic heart of Bromley which is comprised of several areas each with a distinct character which cover:

- the retail core radiating along the main streets which meet at Market Square;
- civic and institutional nodes;
- pockets of residential development; and
- a landscape and parkland setting.

The character areas are as follows:

- High Street (central section)
- High Street (northern section)
- Market Square
- Ravensbourne Valley and Shortlands
- Widmore Road (East) and Tweedy Road
- Queens Gardens and the Glades
- Bromley North Village

The designated Conservation Area reflects the various functions of a major urban centre which has evolved from a modest rural settlement.

### ***CHARACTER AREAS MAP TO GO HERE***

## **Central (Pedestrianised) High Street Character Area**

The Central High Street Character Area extends from Elmfield Road in the south to Market Square in the north. This section of the High Street has a varied built character which is unified by the pedestrianisation of the street. The main pedestrian flows are from north to south whilst there is significant movement west to east from Neuwied Way through the Marks and Spencer store into the Glades shopping centre. Street trees are located at the Southern end and street furniture is located along its length. A reproduction milestone is located outside 90 High Street adjacent to Ethelbert Road. The pedestrianisation of the High Street allows for regular themed markets.

Some buildings in this Character Area survive from the early 19<sup>th</sup> Century; these tend to be modest two storey structures with traditional detailing. The remaining buildings are a mixture of late 19<sup>th</sup> Century to early and mid 20<sup>th</sup> Century buildings. The former tend to be two and three storeys in height with narrow frontages following the traditional building plots with well detailed commercial facades in brick or faience. The western side of the High Street contains large plots with uncompromising modernist buildings built following the war. The Glades shopping centre which was finished in the 1990s has been integrated behind the existing buildings on the east side of the High Street with little impact on the street scene or grain.

At ground floor level, the properties contain shopfronts of various ages and designs. Most shopfronts are modern and are predominantly comprised of sheet glass and some have stallrisers. At first floor level, there is much variation. Some buildings have bays, some are Victorian Terraces, some properties do not have a first floor level, some properties have a set back first floor and some of the more modern properties have a jettied first floor. The roof forms are varied and include flat roofs, gables, mansard roofs, modern roof forms, set back first floors. The predominant building materials are brick, concrete, timber and aluminium.

The view north up the High Street is terminated by the 1930s neo-Tudor building in the centre of Market Square. The view south from the High Street into Market Square is terminated by no. 20-25 Market Square. The view South down the High Street is terminated by nos. 76-82 High Street, a red brick neo-Georgian building, which also terminates the view West down Elmfield Road.

## **Northern High Street and London Road Character Area**

The Northern High Street and London Road runs from Market Square in the south to Bromley College in the north. This section of the High Street is open to traffic and is narrower than the lower section of the High Street. This section of the High Street is open to traffic and is narrower than the lower section of the High Street (Central High Street Character Area). This section of the High Street is a main vehicle throughfare through the town centre as it contains many bus routes and also leads to the A21 (Kentish Way).

The majority of buildings in this character area date from the late 19<sup>th</sup> Century and the majority are three and half storeys in height with narrow frontages. A number of earlier buildings survive and are much lower two storey structures. This section of the High Street has not attracted corporate chain stores or much investment in the buildings as such there has been few enhancements or restorations in recent decades.

The Upper High Street character area is characterised by the variation in facades and roof forms. This is due to the fact that the plots within this section of the Character Area were developed and redeveloped at different times. The building materials are predominantly brick with some render and some timber.

Pedestrian flows tend to be linear along the High Street with the exception of a passage which gives pedestrian access from the eastern side of the High Street to Walters Yard and the Sainsbury's supermarket. Most of the rear elevations of the premises on the east side can be viewed from Walter's Yard and their irregular appearance contributes to the character of that space.

The High Street becomes London Road at the northern end of the character area. Bromley and Sheppard's College is located on London Road opposite the junction with Beckenham Lane. Bromley College is a grade 1 listed complex of buildings which dates from the seventeenth century and is enclosed within a red brick boundary wall consisting of two courtyards of residential accommodation and a chapel. Sheppard's College is also located in this area and consists of a Victorian residential block. The gateway to the college consists of iron gates hung on mitre topped piers marked 1666. The Grade 2 Listed Swan & Mitre Pub is located opposite the colleges on the junction with Beckenham Lane.

The view north up the High Street is terminated by the Magistrates Court a modern brick building on the western side. The view south down the High Street is terminated by nos. 145-153 High Street. The view west along Church Road is one of the most important in the conservation area as the Church of St Peter and St Paul is framed by mature trees, a view little changed since mediaeval times.

## **Market Square Character Area**

The Market Square Character Area links the northern and southern High Street character areas. It functions as a continuation of the pedestrian precinct with the exception of its northern side which is open to vehicular traffic. However, there is no on street parking as this section of road contains bus stops and is a busy through road.

The character of the Market Square is intimate and the buildings are typically 2-3 storeys. The Square is dominated by the large 1930s neo-Tudor building in the centre, which replaced the Victorian Market Hall. This building is well detailed and its shopfronts share a common unified treatment of painted render pilasters and fascia that, although masked in some places, has been successfully reinstated in others.

The view south down the High Street from Market Square is terminated by numbers 145-153 High Street, a low, wide, modern building. The view north out of Market Square into East Street is terminated by no. 19 East Street, a landmark building built to house Bromley Urban District Council.

## **Ravensbourne Valley Character Area**

The Ravensbourne Valley character area is located on the western side of the Conservation area and encompasses the major thoroughfares to Shortlands of Church Road, Glassmill Lane and Beckenham Lane.

The gardens and grounds fronting Beckenham Lane are lined with mature trees and shrubs. A number of Victorian villas step down the hill from Bromley. These include Hill House, Pixfield Court, The Hollies, and no. 5 Beckenham Lane. Pixfield is a grade 2 listed red brick Georgian house which is located on a bend. All the buildings here either adjoin or can be seen from Martins Hill.

Lower down Beckenham Lane on the edge of Shortlands Village is the Valley School, an Arts and Crafts building. Its playing fields and grounds behind extend the open character of the land back through to Martins Hill.

Church Road runs west from Market Square and at the top of Martin's Hill it becomes Glassmill Lane, which also sweeps down the hill into the Ravensbourne Valley at Shortlands. The entrance to Church Road is framed by the Partridge Public House and the flank of 178 High Street. Church Road has an open and semi-rural character. The churchyard on the South side is enclosed by a brick and flint wall with a lychgate. The church is constructed from flint and stone and is comprised of a mediaeval tower and 1950's nave.

The Church House Gardens are located on Church Road beyond the parish church. The entrance to Church House Gardens is marked by a Victorian Lodge with piers and ornate gates. The view from Church Road towards Martins Hill is terminated by another Victorian lodge. A row of two storey Victorian cottages and shops are located on the northern side and the character is more varied.

St Pauls' Square contains a modern housing development which was built on the site of a Victorian vicarage. A small group of early houses survive in St. Paul's Square and are adjacent to a large house named "Wotton Hatch" which is now the rectory and thought to date from the early 19th century. Houses of this type, built for small country gentlemen, farmers and traders in the town market, are now rare survivors in the town centre.

Tetty Way is excluded from the Conservation Area and runs south from Church Road, parallel to the High Street. Tetty Way provides service access into the rear of the High Street stores. Although these High Street buildings are large they are mostly well screened from view by the trees in Church House Gardens.

Martins Hill retains a semi-rural character and is a valued recreational asset to the town. At the top of the hill is the Grade 2\* Listed War Memorial which is an obelisk flanked by the figures of Victory, Liberty and Peace. A Victorian lodge adjoins the park. The views out of the conservation area from Martins Hill to the valley below are of the stone buildings of the Grade 2 Listed water works and into Shortlands which is a wooded hillside dotted with buildings. The wild broom, which grows on the upper slopes of Martin's Hill lends its name to the town. The Ravensbourne

River which has been enclosed in a modern concrete culvert crosses the middle part of Martins Hill.

On the lower slopes of Martin's Hill the openness is preserved by the playing fields of Valley School which link through to Beckenham Lane. Glassmill Lane encloses the South side of Martins Hill and contains Victorian housing which overlooks the parkland.

The area where Glassmill Lane crosses the River Ravensbourne, the road branches south along the riverside to the old millponds. The millponds adjoin the extreme Western boundary of Church House Gardens and are of historical importance. The Grade 2 Listed weather boarded property at no. 19 Glassmill Lane is believed to have formed part of the former mirror polishing mill that stood here and which lends its name to Glassmill Lane.

The War Memorial, Martin's Hill lodge and the medieval parish church tower are local landmarks when viewed from within or across Shortlands Valley.

## **Widmore Road East Character Area**

The Widmore Road East Character Area is located on the western side of the Conservation Area. It extends west from the Kentish Way/ Tweedy Road Junction to 85 Widmore Road on the northern side and number 60 Widmore Road on the southern side. The eastern section of Widmore Road is located in the Bromley North Village Character Area.

The Bromley Baptist Church is located within the Bromley North Village Character Area. To the East of the church No.1 Park Road is an attractive suburban villa with a painted stucco finish and curved dormers. On the opposite side of Park Road, on a triangular site to Widmore Road is a 61 Widmore Road is a recent brick office building which reinterprets the adjoining buildings, borrowing from them features such as its cupola.

On the South side of Widmore Road on the junction with Tweedy Road stands the former police station a locally listed Edwardian building in red brick with bow windows and dormers. Beside it is a new building and beyond this to the east is the First Church of Christ Scientist a red brick building, which makes the transition from town centre to suburb.

At this point Widmore Road changes to a suburban road. On the South side, beyond St Blaise Avenue, are a row of modest, carefully considered Arts and Crafts houses in landscaped gardens. On the opposite side of the road there are tall stock brick Victorian villas.

The view into Bromley along Widmore Road shows a varied roofscape and street trees. The view is terminated by no. 9 Market Square and no. 1 East Street which are both former bank buildings. The tall chimneys and roofline of nos. 171-181 High Street are visible behind.



## **Bromley North Village Character Area**

The Bromley North Village Character Area encompasses the northern side of Widmore Road from Market Square to the Junction of Tweedy Road and Kentish Way, Tweedy Road, East Street, West Street, South Street, Court Street and North Street.

Whilst Widmore Road is a long established route into Bromley its earliest buildings are mid Victorian. The north side of Widmore Road has a terrace of two storied stock brick buildings (nos. 1-21) all with shopfronts. No. 17 retains its original ornate shopfront with carved colonettes and mirrored soffit above the recessed door. Some shopfronts have been converted with folding doors or new fronts recessed behind balconies. On the South side near the junction with East Street are a number of well-detailed Victorian buildings including The Compass Public House which is an Arts and Crafts building which sits on the corner of Fyffe Way.

A large block of new development which is part of the Glades shopping centre and the United Reform Church is located on the southern side of Widmore Road between Fyffe Way and the Glades shopping centre. The former is a very large building, which has been carefully modelled with a distinctive roofline, and the latter is a red brick building incorporating attractive decorative brick and ironwork. These buildings add variety and quality to the street scene. Two adjoining modern buildings, which fail in this respect, are nos. 24-30 and 33-37 Widmore Road, both dating from the mid-late 20<sup>th</sup> Century, are modern blocks of little interest.

Beyond Court Street, at the junction with Tweedy Road stands the Grade 2 Statutory Listed Town Hall Extension which is a 1930s neo Georgian building. The view across Kentish Way along the eastern part of Widmore Road shows a road lined with trees and substantial suburban housing. This distinction between leafy suburb and town centre is particularly important illustrating the difference in character between the two distinct land uses.

The Tweedy Road/Widmore Road junction is enclosed by a number of very important landmark buildings and, in spite of the noise and street clutter associated with the heavy volumes of traffic; it has an attractive and spacious character. The buildings form part of a civic node, which also extends into South Street. The former Town Hall and former School of Arts and Science buildings face one another across Tweedy Road. The Bromley Baptist Church is also included in this node. An attractive pedestrian passage separates the former Arts School building on the corner of Tweedy Road and Widmore Road from the adjoining Victorian building stock brick Baptist Church. This building is particularly important as it terminates the view up Tweedy Road from the South.

The civic node at the junction of Tweedy Road and Widmore Road also extends into South Street and Court Street which link back to East Street and Widmore Road respectively. These streets have a quiet and dignified character. The rear and flanks of the former town hall are visible from these streets. The original architecture is attractively detailed and carefully executed. Unfortunately mid-late 20<sup>th</sup> Century additions have not been to the same standard. That can also be said of Community

House (the former Magistrates Court) on South Street, a symmetrical neo-Georgian building that has been scarred by unsympathetic additions.

Opposite the former Magistrates Court is the Fire Station which is another Edwardian neo-Georgian building, which terminates the view up Court Street from Widmore Road and complements the Town Hall and the former Magistrates Court grouping.

Further to the west, towards the junction with East Street, is a row of two storey stock-brick terraced cottages. These are of value historically in that one of them was once a school where H G Wells received his early education, and to the streetscape as their residential character adds welcome variety to the street scene in the core of the town centre.

East Street runs north from the junction of Market Square and Widmore Road then north east up to Tweedy Road and the corner of north Street. East Street was laid out in the mid 19<sup>th</sup> Century and is a narrow street with an assortment of Victorian commercial buildings and premises. Only two modern buildings (nos. 16-20 and 30-36) interrupt this Victorian character of stock brick buildings with traditional timber sash windows and tile or slate roofs. All of the other buildings contribute to the character and appearance of the area including the former Post Office, no. 19 (former Bromley UDC offices), nos. 27 - 29 (former Drill Hall), Market Buildings, and the Railway Hotel.

The former post office building terminates views into Bromley although the junction is cluttered with signage and street furniture. Views out of Bromley from East Street terminate with an oblique view of Bromley North Station with its forecourt trees.

North Street runs west to east between West Street and East Street. The south side has modest two storey Victorian houses with canted bays and traditional sash windows; unfortunate alterations have marred some of these buildings. Its north side is all modern development. The view west is into College Slip and beyond which is a leafy passage of semi-rural character.

West Street runs north from its junction with East Street and becomes College Road where it meets North Street. Its southern part, nearest the town centre, has two red brick buildings. However, this end of the street is dominated by two large modern buildings, the Sainsbury's Supermarket and nos. 2-12, the former is sympathetic in red brick and sports decorative panels of public art. The latter makes no contribution to the conservation area. The main part of West Street has modest two storey semidetached Victorian houses, many of which have been altered. College Road has a number of similar Victorian houses and the modern Methodist Church on the east side and on the west side is College Green with its mature trees and important glimpse views of Bromley College beyond.

## **Queens Gardens and the Glades Character Area**

The Queens Gardens Character Area is located to the east of the Glades Shopping centre and encompasses the Queens Gardens, Queens Road and is contained by Kentish Way to the east.

Queens Road is located to the south of Widmore Road and runs parallel to the Glades Shopping Centre and Kentish way. Queens Road is a remnant of the character of Bromley Town Centre prior to the construction of the Glades and Kentish Way. Queens Road contains pairs of two storey red brick Victorian houses with canted bay windows and ornate detailing. To the south end of the street lies Queens Gardens.

Queens Gardens is an important park linking the town centre and the civic centre. It was originally known as White Hart Field and was linked to Market Square by White Hart Slip. Today the Glades shopping centre is located over White Hart Slip but the right of way has been maintained. Queens Gardens has many mature trees and is enclosed to its west side by the understated rear elevation of the Glades shopping centre. The 18<sup>th</sup> Century gates that at one time served Plaistow Lodge remain in situ and are Statutory Listed grade 2.

The Glades Shopping Centre is a substantial structure stretching south from Widmore Road to Elmfield Road. The building has been designed and detailed to complement the town centre with differing but harmonious treatments to the various parts. The building has been excluded from the conservation area but still has an impact on its character as its eastern elevation dominates the Queens Gardens.

Kentish Way is the by-pass for the town centre and links Masons Hill to the South to Tweedy Road in the north. It is flanked by a number of large trees at Queen's Gardens and provides a vista northwards which is terminated by the former Library and the Baptist Church.

## 2. Management Plan

### Policies & Guidance

Any new development should have regard to national, regional and local planning policy. The following policies will assist the consideration of any applications required for planning permission or consent, which may impact upon the Conservation Area. They also provide guidance to property owners and others in encouraging approaches and methods, which will assist the conservation and enhancement of the character and appearance of the Conservation Area. The policies are supplementary to the more generalised heritage conservation objectives and policies detailed in the Borough's Unitary Development Plan and the Bromley Town Centre Area Action Plan. This document also reflects the government guidance given in Planning Policy 5 – Planning for Historic Environment published by the department of Communities and Local Government (DCLG) in 2010 and the Historic Environment Planning Practice Guide published by DCLG, English Heritage and the Department of Culture, Media and Sport in March 2010.

At the national level, the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on the London Borough of Bromley to designate Conservation Areas in “*areas of special architectural or historic interest*”, and to formulate and publish proposals for the preservation and enhancement of its Conservation Areas. National policy for planning and the historic environment is set out in Planning Policy Statement 5 (PPS5) and the accompanying Historic Environment Planning Practice Guide.

Planning Policy 5 – Planning and the Historic Environment (PPS 5) was published in 2010 and is the Government's Planning Policy for the historic environment. Policy HE6 of PPS 5 states that all applications affecting heritage assets (including conservation areas) ‘*should be accompanied by a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the application's impact*’. These descriptions will be referred to in this document as ‘Statements of Significance’.

At the regional level, policy 4B.11 of the London Plan: Spatial Development Strategy for Greater London states that “*The Mayor will work with strategic partners to protect and enhance London's Historic Environment*”.

At the local level, the policies saved in July 2009 from the London Borough of Bromley Unitary Development Plan (UDP) 2006 contains policy BE11 Conservation Areas which is as follows:

*‘In order to preserve or enhance the character or appearance of conservation areas, a proposal for new development, for engineering works, alteration or*

*extension to a building, or for change of use of land or buildings within a conservation area will be expected to:*

- (i) respect or complement the layout, scale, form and materials of existing buildings and spaces;*
- (ii) respect and incorporate in the design existing landscape or other features that contribute to the character, appearance or historic value of the area; and*
- (iii) ensure that the level of activity, traffic, parking services or noise generated by the proposal will not detract from the character or appearance of the area.'*

Policy BE 12 of the London Borough of Bromley UDP is concerned with Demolition in Conservation Areas, Policy BE 13 is concerned with Development Adjacent to a Conservation Area and Policy BE 14 is concerned with Trees in Conservation areas.

### **Bromley Town Centre Area Action Plan**

The Bromley Area Action Plan is scheduled to be adopted on at a Full Council meeting on 25 October 2010. The Conservation Area Statement expands upon and in some cases subdivides those character areas identified in the Area Action Plan which lie within the Conservation Area.

### **Preservation and Enhancement**

The primary purpose of designation of a Conservation Area is to identify “*areas of special architectural or historical interest the character and appearance of which it is desirable to preserve or enhance*” [Section 69(1) of the Planning (Listed Building and Conservation Areas) Act 1990]. It is adopted policy of the Council “*to preserve and enhance the character or appearance of conservation areas....*”. [UDP Policy BE.11]

This demonstrates a strong commitment to the conservation and enhancement of the character and appearance of designated conservation areas. The above statement defines that character and appearance, whilst the following policies and guidance provide more details as to how this may be achieved.

### **Demolition**

Proposals for the demolition of structures within the conservation area will normally be assessed against the contribution of the structure in question and against Policy BE 12 of the UDP. This contribution could be on an individual basis or as part of a group of buildings. This will normally be assessed on a case by case basis in the context of specific circumstances.

Some buildings and structures are individually designated through statutory or local listing and these are strong contributors to the character and appearance of the Conservation Area. However, non-listing by no means implies that a building is non-contributory, and there should be no presumption of this. The character and appearance of a Conservation Area is frequently embodied in buildings, which are not in themselves exceptional, but are contributors to the Area’s noteworthiness. A

Heritage Statement as outlined in policy HE6 of PPS5 should be provided with any application for demolition in the conservation area. The Heritage Statement should outline the contribution that a building or buildings makes to the Conservation Area.

To avoid vacant or derelict sites and consequent uncertainty about the future of a site, demolition will not normally be permitted prior to secure commitment to a specific form of redevelopment. Where appropriate the use of legal or financial securities will be considered to ensure fulfilment of such commitments.

### **Siting of New Development**

New buildings in a conservation area will normally only be considered:

- on a site created through demolition of an existing building;
- on a currently vacant plot; or
- as an additional building on a plot presently accommodating a building (where appropriate opportunities can be identified).

The characteristics of the relevant character area as described in the Appraisal section of this document should be a starting point for the conception of design concepts for any new development in the Conservation Area.

The established density and layout in the area will provide a guide to the appropriate scale and positioning of any new development. Insertion of new structures within already developed plots will generally require constraint in scale and careful positioning to ensure that they do not detract from the established character and appearance.

### **Layout**

The siting and layout of new structures must be respectful of the character and appearance of the Conservation Area. This requires recognising and responding to the predominant scale, form and detailing of contributory buildings, and reflecting the bulk and spatial composition of structures and intervening spaces.

Spaces around and between buildings are often an important part of the character and appearance of an area, and the setting of principal contributory buildings. In particular in the town centre, the composition and relationships between buildings and open spaces (both public and private) is an important element of character and appearance.

### **Design of New Buildings**

Where new buildings are deemed to be appropriate, attention is required to ensure their compatibility with the Conservation Area, which should result in a positive contribution to the area both in its own right, and as an element in the urban form. As well as buildings, this relates to the spaces and relationships between buildings, and the treatment of the site and surroundings.

In particular, new buildings should not become dominant elements or overwhelm existing structures and spaces. For example, it is good practice for new buildings to keep within the typical height of existing buildings, ideally remaining slightly lower than adjacent buildings. Building frontages and bulk should be addressed similarly. Attention should also be paid to the articulation, fenestration and break up of existing buildings, and the scale at which this occurs, avoiding visual massing out of scale with established and contributory elements.

The adoption of scale, forms and materials characteristic of the Conservation Area is appropriate. (the underlying principles are similar to those relevant to alterations and additions, which are detailed below). However design which attempts "mock historic" replication of buildings from earlier eras is discouraged, as this lacks authenticity, dilutes the Area's significance, and can confuse interpretation of the Area's historical development. An exception may be justified where reinstatement of an important missing element of the built form will repair a jarring gap and can be based on detailed historical records. In these cases, clues to the building's more recent origins may be provided by restrained detailing and a date stone where appropriate.

It requires considerable design skill to introduce a building, which is recognisably and unashamedly new, yet respectful of and complementary to the character and appearance of the Area. Such a design challenge deserves the involvement of specialist, experienced professionals.

English Heritage and the Commission for Architecture and the Built Environment (CABE) have produced guidance entitled "Building in Context: New Development in Historic Areas" and it is available at <http://www.building-in-context.org> . Full use should be made of such resources and reference should be made any the Design and Access or Heritage Statement that accompanies an application.

### **Alterations and Extensions**

The Conservation area is not a museum, but a living part of the urban area, particularly the central retailing and business functions. Changing business and administrative needs, lifestyles and expectations will result in pressure for adjustments to existing buildings to respond to this. Such modifications can frequently be achieved without diminishing the character and appearance of the Area, but care is required.

The Historic Environment Planning Practice Guide for Planning Policy Guide 5 (PPS5) provides guidance on the alteration of Heritage Assets. As Conservation Areas are considered to be Heritage Assets, the principles and guidance detailed in this document are also applicable to any building that within a Conservation area. The advice contained in the Practice Guide for PPS5 along with this Management Plan will be utilised when considering proposals to alter a building that is considered to contribute to the Conservation area.

## **Location and Form of Extensions**

Extensions and additions should reflect the forms, materials, textures and finishes of the host building, along with the design philosophies underlying its style. These vary between individual buildings in this Conservation area, and will need to respond to the specific building. The proportions, positioning and integration of an extension to the host building should be designed to safeguard not only the building's contribution to the public realm, but its enduring value to the owner. It should not be so large as to dominate or compete in visual terms with the host building.

## **Materials and Methods**

Materials utilised in additions and alterations should match those of the host building, by the reuse of reclaimed materials where possible, or by careful matching of new materials. Care should be taken with details such as the matching of brick bonds and continuation of stringcourses or lintels.

## **Shopfronts**

Original shopfronts are very important to the character of commercial areas. Retention and reinstatement of original frontages and/or details will be strongly encouraged. Where introduction of new shop fascias is appropriate, the Council encourages these to be designed in a manner to enhance the street scene and to be no larger than those of neighbouring shops.

The installation of permanently fixed, or external steel roller shutters, deadens the streetscene and attracts graffiti. Where it is considered that security shutters are appropriate, Council strongly encourages the use of toughened glass. This minimises visual impact and maintains an active and interesting street scene, important to ensuring active pedestrian usage out of trading hours, with consequent security benefits.

Where security shutters are to be used, policy BE20 of the UDP requires that open mesh or lattice shutters are preferred as they allow a clear view into the shop and maintain a visible window display, and are considered to provide adequate protection to most shop fronts

As shopfronts are replaced, particularly in 19th century buildings, the Council will encourage enhancement through the reinstatement of traditional design elements, such as stall risers and pilasters of painted timber construction that are more appropriate to the age and form of the host building.

Policy BE19 of the Bromley UDP requires that all replacement shopfront proposals should be well-related to its context whether this is the host building, parade or wider street scene as a whole; of a high quality of design and use appropriate materials. Period design shopfronts and existing or original features are retained or reintroduced where appropriate. It also requires that deep or uninterrupted fascias, or those which extend above first floor level should be avoided and that stallrisers should be provided, and are well-related in scale and height to the host and, where appropriate, neighbouring properties;



In addition, in Conservation Areas, the retention of shopfronts that contribute to the street scene even when the commercial use has ceased is required.

## **Exterior Details**

Details characteristic of the building type and era should be retained wherever possible. Alterations to the exterior form and detailing of a contributory building should respond sensitively to the significant elements of the building. In particular attention should be paid to protecting and reflecting element of the original design detailing, such as chimneystacks, ridge tiles, lintels, and stringcourses. Every effort should be made to retain and repair such original details. Regular and timely maintenance is preferable to the difficulty and expense incurred by belated repair or, ultimately, replacement.

## **Windows and Doors**

Original window and door proportions, materials and detailing should be retained. Repair of original joinery is desirable where practical, with any necessary new work matching in materials and detailing. Insensitive replacement doors and windows can seriously detract from the character of a building and, in turn, the conservation area.

Mass produced standard components (particularly those made in UPVC) can rarely reflect the carefully considered proportions and detailed mouldings of original doors and windows, and their use is discouraged. Whilst their installation may be cheaper, they are visibly inappropriate to a period building, and can seriously detract from the value of a property.

## **Dormers and Roof Lights**

The desire to increase useable areas in a dwelling often lead to the conversion of attic and roof spaces into rooms. This results in the requirement for natural lighting where none, or insufficient, is available at present. The most common responses are to insert dormer windows into the roofline, or to install roof lights. The appropriateness of either approach will depend upon the individual circumstances of each building, and should not begin with a presumption that either approach will necessarily be compatible to a particular case.

Dormer windows are a component part of some architectural styles. However, in other cases the introduction of dormers will be inappropriate, particularly on prominent front or side rooflines. Close attention to the style of the host building can indicate whether appropriate opportunities exist. Where an opportunity is identified, the scale of a dormer should respond to traditional styles, usually requiring some restraint of the urge to maximise internal spaces to avoid adversely impacting upon the appearance of the building and Conservation area. If installation of dormers is appropriate, they should be set below the ridgeline of the host building.

Roof lights must be sited sensitively to avoid detracting from important views of the building. Where roof lights can be demonstrated to be compatible, they should be mounted flush with the roofline rather than in a raised box, which emphasises their presence. Normally, placement in rear elevations is preferable to the front elevation.

## **Satellite Dishes, Domestic Microgeneration Equipment and other Plant**

The location and appearance of plant, extractors and other equipment such as satellite dishes on properties, should be carefully considered.

Satellite dishes must not be placed on a chimney, roof or wall that is visible from a highway. As such, any satellite dishes should be located in rear gardens or another service should be used. For further information on the regulations governing the size and location of satellite dishes see 'A householder's Planning Guide for the Installation of Antennas, including Satellite Dishes' produced by the Department of Communities and Local Government (2008).

Under the General Permitted Development (amendment) Order 2008, solar panels and solar thermal equipment are not permitted in a Conservation Area if they are to be installed on a wall forming the principal or side elevation of the dwelling house and would be visible from a highway or on a wall of a building within the curtilage of the dwelling house and would be visible from a highway.

More information about adapting to climate change and increasing energy efficiency can be found at [www.climatechangeandyourhome.org.uk](http://www.climatechangeandyourhome.org.uk) .

## **Hardstandings and Driveways**

Frequently, proposals for hardstandings and driveways are generated by the desire to accommodate motor vehicles on the plot, or to increase the capacity for this use. This mainly occurs in the more residential areas on the fringe of the Conservation Area.

Recent changes to the General Permitted Development Order have restricted the amount of hard surfacing allowed within the curtilage of a dwelling house. Where that hard surfacing would exceed 5 square meters planning permission is now required unless that surfacing is made of porous materials which will allow for a better thought out landscaping scheme in front gardens incorporating hard standing and porous materials without diminishing the setting of the building or adversely affecting the character and appearance of the conservation area.

Where opportunities do exist, minimising the width of the opening in a front wall will reduce the impact upon the streetscene whilst retaining some screening of the front garden. Paving may be addressed as a component part of a comprehensive design treatment, so visually remains part of the garden, rather than appearing as an area deducted from it. Retention of border planting can avoid starkness caused by paving to wall or building edges.

## **Garages**

In residential sections of the Conservation Area, the introduction of garages needs to be sensitive to the building forms of the area. In some situations, a single level wing at the side of a larger dwelling may fit the general form of development, whilst in others it may detrimentally alter the built form, such as by blocking openings between buildings, which may be characteristic of the area. Traditional garages may

be too small to accommodate modern vehicles. If enlargement or replacement can be sensitively achieved, it may be possible to borrow design elements from the original to retain compatibility. Rarely will enclosed parking forward of the primary frontage of the main building be appropriate or supported.

### **Trees, Gardens, Hedges**

Established trees and gardens play an important contributory role to the character of most Conservation Areas. Within the Bromley Town Centre Conservation area the pockets of parkland and incidental trees and gardens are a vitally important relief to the intensive urban character of the town centre.

### **Changes of Use**

The commercial centre of the Conservation Area is, by its nature, at the forefront of evolving demands and pressures for change. The challenge is to absorb change whilst retaining the essential character which links the centre with the richness of its past and sustains the spirit and identity of place.

The viability of a significant building's retention can sometimes be assisted through finding a new use which might return it to an economic function which can support maintenance, repair and conservation works. This must be balanced with other considerations, including the potentially reduced significance of a building, which no longer performs the role for which it was established.

Consideration also needs to be given to consequential pressures, which may flow from a change of use which may include the potential of increased demand for car parking, either on site or in the locality. On site parking can often impact adversely upon open spaces which are contributory to the character and appearance of the Area, such as through the loss of garden settings. Where parking is on street, the presence of many cars for much of the time can detract seriously from the appearance of an area.

### **Advertising and Signage**

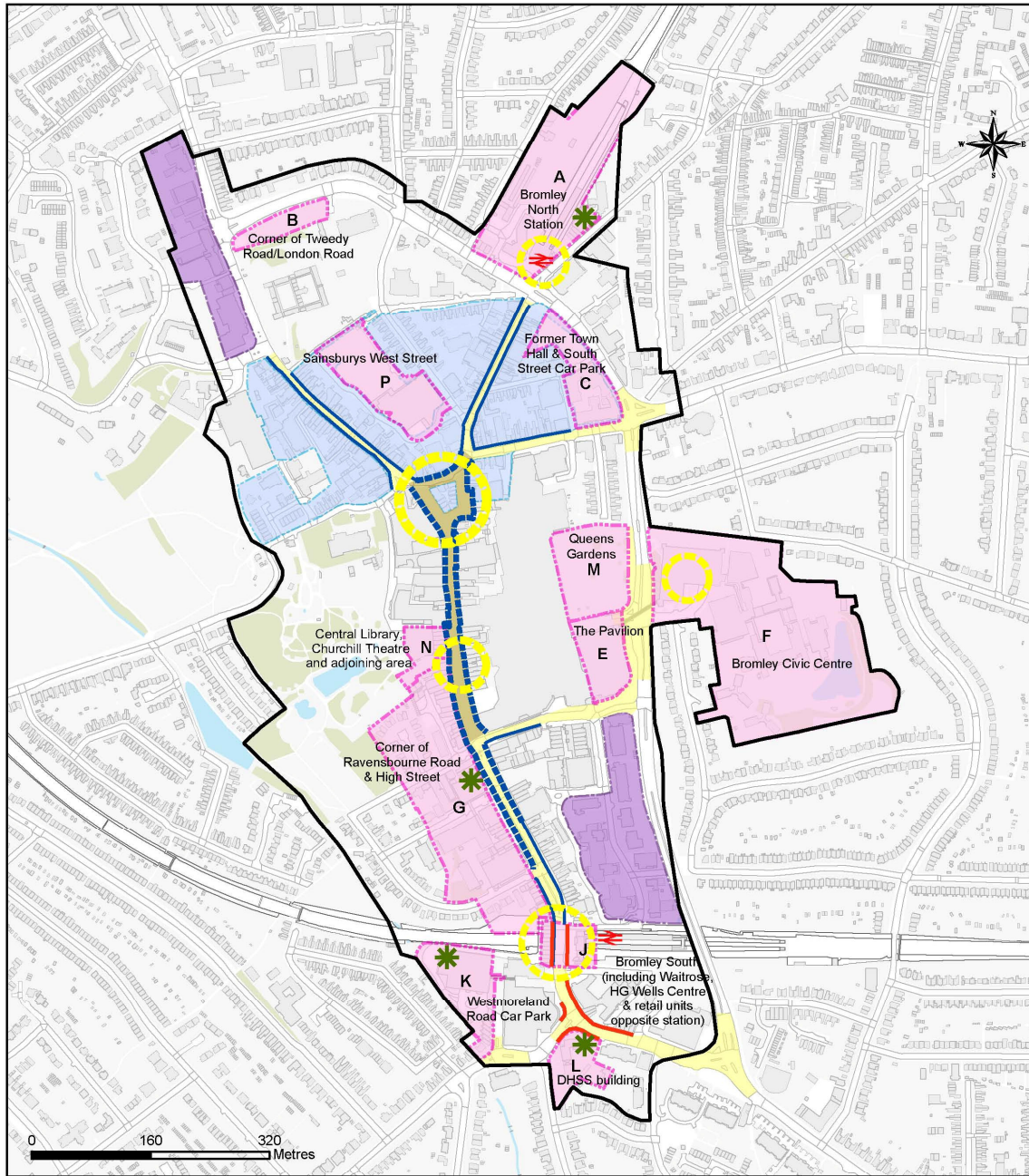
The Council wishes to ensure that businesses in the commercial sections of conservation areas are able to effectively advertise their goods and services. However, it also wishes to reduce the visual clutter that poorly designed, located or oversized advertisements can cause. Advertisements which are seen to detract from the character of the area will be resisted or made subject to discontinuance action where necessary.

Retail units will often be able to make use of front window space and window fascias to advertise goods or services. A carefully designed and painted fascia, combined with a good window display is an excellent advertisement for a shop and will contribute to the character of the conservation area. Where this opportunity is available, the Council will normally resist the placing of advertisements on other parts of a building. The practice of painting out of shop windows as a form of display or advertising is also discouraged, stifling the contribution which the display or goods and visibility of inside activity contribute to the overall sense of vitality and interest.

New and replacement signs should be designed in a way that minimises their impact: they should not be displayed at first floor level or above, especially on exposed flank walls. External illumination is preferred over internal illumination on traditional shopfronts. However, light fittings should be small and low key. New fascia signs should not exceed the depth of the fascia.

Within residential areas, every attempt should be made to keep advertising material to the smallest possible scale. Illuminated advertisements will not be acceptable in residential locations.

## Bromley Town Centre Area Action Plan



**Legend**

- Town Centre Boundary
- ✱ Possible Locations for Taller Buildings
- Land Safeguarded for Transport Schemes
- Retail Frontage**
- Primary Retail Frontage
- Secondary Retail Frontage
- btc aap prop sites AAP 09

- Improvement Areas**
- Business Improvement areas
  - Improved Public Realm and/or building frontages
  - North Village Area Improvement
  - Pedestrian Area Improvement
  - New / Improved public spaces

- A. Bromley North Station
- B. Corner of Tweedy Road/London Road
- C. Former Town Hall and South St car park
- E. Pavilion
- F. Bromley Civic Centre
- G. West of High St
- J. Bromley South
- K. Westmorland Road car park
- L. DHSS building and Bromley Christian Centre
- M. Queens Garden
- N. Central Library / Churchill Theatre
- P. Sainsburys, West St
- D. Hill St car park (former opportunity site)

Data Source: Ordnance Survey / Bromley Borough Council / AECOM

Map Source: © OS Crown copyright. All rights reserved. London Borough of Bromley (LA100017661 2009).

● Last Updated: October 2009

Figure 9

An Area Action Plan (AAP) for Bromley Town Centre has been prepared and a submission document was published in November 2009 following public consultation. The AAP seeks to ensure that the town centre can accommodate future development requirements in order to maintain Bromley's competitive position. The Key Strategic Priorities of the AAP can be summarised as follows:

- Promoting more intensive forms of development in areas well served by public transport;
- Intensifying retails, 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 (AAP 1.3: 2010)

A number of the proposed development sites are either in, or adjacent to, the Bromley Town Centre Conservation Area. Additional site specific guidance is provided below for a number of the opportunity sites. Where any of the proposals involve demolition of existing structures, their contribution should be addressed through a Heritage Statement as outlined in Policy HE6 of PPS 5.

Guidance contained in the AAP highlights key issues of:

- Permeability and attracting footfall to area,
- Active frontages to pedestrian routes,
- Building heights

The following site specific notes should be read in addition to the guidance given in the AAP:

**Site A:**

Site A is located adjacent to and including Bromley North Train Station which is a Grade II Listed Building. The station is currently poorly maintained, underused and not reaching its potential in terms of its contribution to the Conservation Area. Any development in site A should therefore include proposals to enhance this facility through repair of the building, forecourt improvements and upgraded passenger facilities.

**Site B:**

Site B is located on Tweedy Road adjacent to the Grade I listed Bromley College, and Grade II listed Sheppard's Colleges. As such, the impact of any development on the setting of the listed buildings is of primary importance. The relationship of any new development with Sheppard's College in particular should also be handled carefully, in terms of bulk, scale and proximity. Any proposed development should also include a visual assessment showing the impact of the development on views into and out of the Conservation Area.

**Site C:**

Site C includes the Grade 2 Listed former Town Hall building and the South Street Car Park. Any proposals to reuse the Grade 2 Listed Town Hall should be sympathetic to the internal and external fabric and features of the structure. As such, only uses that can be proven not to damage the special interest of the Listed Building will be considered.

**Sites G, H and N:**

Sites G, H and N comprise the western side of the High Street and reaches from the Churchill Theatre south to Bromley South Station.

Sites N and part of G are located within the Conservation Area. As such, redevelopment may include the demolition of a number of structures south of the Churchill Theatre. Therefore, a Heritage Statement should also be provided with any proposal to develop this area, this assessment would allow for the contribution of the existing structures to the conservation area to be fully understood.

**Site M:**

Site M comprises the Queens Gardens a public open space on the eastern side of the conservation area. In addition to the guidance contained in the AAP, measures should be taken to protect the listed iron gates to the southern section of Queen's Gardens as well as the openness of the park.

**Site P:**

Site P comprises the Sainsbury's building and is near the oldest part of the Bromley Town Centre. Development must integrate with surrounding properties, complement the existing character of the Bromley North Village, improve views from adjacent rear elevations, upgrade the site perimeter and create better pedestrian flows to the town centre. As such, any development proposal should be accompanied by sufficient contiguous elevations in order to assess the impact on adjacent historic buildings.

**Enhancement Action by the Council**

The Council has a diverse variety of statutory and administrative responsibilities, which can impact in a variety of ways upon the integrity and vitality of the conservation area. Street works, traffic management and placement of infrastructure components will attempt to reconcile conservation area objectives with wider functional objectives.

The Council owns or manages a number of properties within the conservation area, and as a responsible landowner and manager will attempt to pursue the objectives for the conservation area outlined in this document as part of its responsibilities.

**Advisory Panel for Conservation Areas**

The Council will ensure that development control in conservation areas is undertaken with care and sensitivity to the character and appearance of the area. This is achieved by referring applications to the Council's Conservation Officer, Tree Officers as appropriate and the Advisory Panel for Conservation Areas (APCA). The Advisory Panel for Conservation Areas consists of independent representatives of



relevant professions (such as architecture & town planning) and interest groups such as Local Civic Societies and Residents' Associations. Each conservation area is entitled to an APCA representative, usually nominated by the local residents' association.

## Contact Us

If you have a wider planning or conservation problem or you need help or advice, let us know. We will try to resolve problems as quickly as possible.

There is further advice about what to do if you have a problem or a complaint in the leaflet "**Getting it Right**" which is available at the Planning and Engineering Reception in Bromley Civic Centre; Telephone 020 8313 4595.

If you have a conservation area question or wish to make a development proposal in a conservation area, the Council will be happy to advise you on an individual basis. For further assistance, please contact:

Renewal and Recreation Department  
London Borough of Bromley  
Civic Centre  
Stockwell Close  
Bromley  
Kent BR1 3UH

For advice or information on **Listed Buildings, Locally Listed Buildings and buildings in Conservation Areas:**

Conservation Officer	020 8461 4664
Conservation Officer	020 8313 7532

For advice or information on **planning applications and policy** in this conservation area:

Development Control	020 8313 4956
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For advice on **trees or landscape** in this conservation area:

Principal Tree Officer	020 8313 4516
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For advice on **environmental improvements and enhancement projects:**

Urban Designer	020 8313 4573
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## Other Useful Contacts

### ENGLISH HERITAGE

The Government's adviser on the historic environment

1 Waterhouse Square,  
138 - 142 Holborn  
London  
EC1 2ST

Telephone: 0870 333 1181

Email: [customers@english-heritage.org.uk](mailto:customers@english-heritage.org.uk)

Website: <http://www.english-heritage.org.uk/>

### DEPARTMENT OF COMMUNITIES AND LOCAL GOVERNMENT (DCLG)

The Government Department with responsibility for planning

Eland House  
Bressendon Place  
London  
SW1E 5DU

Telephone: 0303 444 0000

Email: [contactus@communities.gov.uk](mailto:contactus@communities.gov.uk)

Website: <http://www.communities.gov.uk/>

### THE TWENTIETH CENTURY SOCIETY

70 Cowcross Street  
London  
EC1M 6EJ

Telephone: 020 7250 3857

Email: [coordinator@c20society.org.uk](mailto:coordinator@c20society.org.uk)

Website: <http://www.c20society.org.uk/>

#### THE VICTORIAN SOCIETY

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Mr Kevin Munnelly  
 Head of Town Centre Planning Projects  
 London Borough of Bromley  
 Civic Centre  
 Stockwell Close  
 Bromley  
 BR1 3UH

Our Ref: PINS/G1580/429/5

Date: 11 August 2010

Dear Mr Munnelly

**LONDON BOROUGH OF BROMLEY, BROMLEY TOWN CENTRE AAP  
 DEVELOPMENT PLAN DOCUMENT: FINAL REPORT**

Thank you for your letter of 5 August, providing your comments in response to the fact check of the Inspector's report on the Council's Bromley Town Centre Area Action Plan.

The Inspector has corrected the errors that have arisen and made the amendments to the report where appropriate, and I enclose your final report.

Yours sincerely

*Allison Ingham*

Allison Ingham  
 LDF Section







# **Report to London Borough of Bromley Council**

**by Eric T Searle Dip TP FRTPI  
FBEng MCI**  
an Inspector appointed by the Secretary of State  
for Communities and Local Government

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11 August 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE BROMLEY TOWN CENTRE AREA ACTION PLAN**

Document submitted for examination 11 November 2009

Examination hearings held between 30 March and 14 April 2010

File Ref(s): LDF000368

## **Executive Summary**

The Council's plans for strengthening Bromley Town Centre through the promotion of a range of mixed use developments is supported. The 12 "opportunity sites" identified do provide appropriate opportunities for a range of new developments including shops, offices, dwellings and hotels. As one would expect in an Area Action Plan much of the discussion at the examination involved matters of detail and a considerable range of opinions were expressed by various interested parties. A number of changes are recommended but in general these were agreed or suggested by the Council as a result of representations made or the discussions that were held during the examination sessions. None of the changes alter the fundamental approach that the Council is proposing but they do help to build a stronger consensus about how the centre of Bromley should be improved.

The High Street opportunity site (Opportunity Site G) is important both for improved shopping opportunities and housing development in the town centre. The Council rightly regards it as one of the key sites. However the Plan has not provided sufficient detail to show how its hopes for the area can be realised. Consequently further work will need to be done through the development of a Master Plan for this area.

The overall conclusion is therefore that the Council's proposals are essentially sound and provide a good basis for the future planning of the Bromley Town Centre.



## **Introduction and Overall Conclusion**

- 1.0 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
  - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document, and
  - (b) whether it is sound.
- 1.1 This report contains my assessment of the Town Centre Area Action Plan in terms of the above matters, and my reasons for them, as required by s20(7) of the 2004 Act.
- 1.2 I am satisfied that the Area Action Plan meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted plan against soundness criteria set out in Planning Policy Statement 12 at paragraph 4.51 - 4.52 to ensure that the plan is justified, effective and consistent with national policy.
- 1.3 The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. Although there were minor pre and post submission changes in wording for clarification none of these changes materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 Appendices 1 and 2 combine the sets of focused changes which were subject to public consultation and were an addendum to the submitted Area Action Plan; these did not go to the heart of soundness but were minor editorial changes, together with later minor changes resulting from the examination. Appendix 3 contains my recommended changes for soundness.
- 1.5 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of soundness criteria contained in Planning Policy Statement 12.
- 1.6 My overall conclusion is that with the changes I have recommended the Area Action Plan is sound.

## **Legal Requirements**

- 2.0 The Bromley Town Centre Area Action Plan is contained within the Council's Local Development Scheme, that was submitted for approval in July 2007. The Core Strategy for the Borough is expected to be submitted in 2011.

- 2.1 The completion of works in the Area Action Plan is a Borough Council priority and for this reason the Area Action Plan has been submitted in advance of the Core Strategy.
- 2.2 The Area Action Plan is accompanied by a Sustainability Appraisal (June 2009). This appraisal has identified positive social and economic benefits and that environmental impacts can be mitigated.
- 2.3 Vision and objectives are also contained in the Sustainable Community Strategy for improving quality of life in the Borough (Building a Better Bromley 2020 - March 2009).
- 2.4 I consider that the Area Action Plan has followed the requirements of the Statement of Community Involvement for consultation.
- 2.5 The Area Action Plan is deemed to be in general conformity with the planning policy objectives set out in the Consolidated London Plan (2008) and with the South London Sub-Regional Development Framework (May 2006), which provides the development framework for South London, including Bromley.
- 2.6 A full Appropriate Assessment of the Bromley Town Centre Area Action Plan under Regulation 48 of the Conservation (Natural Habitats and Conservation) Regulations 1994 was not required by Natural England. In this city centre location I do not believe there would be significant harm to potential or designated habitat sites, as a result of the policies and proposals within this Area Action Plan.
- 2.7 With the changes proposed to update the Area Action Plan I am satisfied that the Area Action Plan has regard to current national policy.
- 2.8 The Borough Council submitted statements under Regulation 31 of the Town and Country (Local Development)(England) Regulations 2004 in September 2008. I am satisfied that the Area Action Plan complies with the specific requirements of the 2004 Regulations including the requirements in relation to the publication of prescribed documents; availability of them for inspection and local advertisement; notification of interested parties and bodies and provision of a list of superseded saved policies.
- 2.9 It is evident from the documents submitted by the Council, including the Regulation 30 (1)(d) and 30(1)(e) Statements and its Self Assessment Paper, that the Council has met the requirements as set out in the Regulations.
- 2.10 Accordingly, I am of the view that the legal requirements have all been complied with.

## **Justified, Effective and Consistent with National Policy**

3.0 I now consider the Area Action Plan under Issues 1 to 5 below.

### **Issue 1 – Whether the vision and objectives are appropriate and justified**

4.0 Bromley Town Centre is the main retail and employment centre for the Borough but over the years its attractiveness and viability have declined. The centre has been unable to keep up with the competition from other centres such as Croydon and Bluewater. These larger centres will obviously continue to dominate but there is a pressing need to provide for planned growth to stimulate the renewal and expansion of the commercial opportunities which the town centre of Bromley can offer. Change is required so that the town centre can realise its full potential as a place to shop, live, and work, while protecting the essential character of the more historic parts of the town. The vision for town centre has been incorporated into 8 key objectives.

4.1 I did not find from my examination that there was particular local concern about the objectives of the Area Action Plan. There was more concern about the implementation of the objectives through the BTC policies and the more specific policies relating to the individual Opportunity Sites. These I consider in detail later in this report.

4.2 I find the Vision and Objectives sound.

### **Issue 2 – Whether the Area Action Plan policies will provide for an acceptable balance of uses within the town centre.**

5.0 The Consolidated London Plan (2008) designates Bromley as a Metropolitan Centre and requires local policies to exploit and enhance the town centre's accessibility, provide for a full range of town centre functions and sustain and enhance vitality and viability. There is also the need to ensure capacity is available for an increase in retail, leisure, community and business services.

5.1 The mixed use development of the centre is proposed to accommodate the growth requirements of the centre and promote vitality and diversity, and is in accordance with the South London Sub-Regional Development Framework which states that growth across the sub-region must be accommodated in those areas with the greatest potential for sustainable development. This includes the town centre of Bromley.

5.2 The proposals are also intended to reverse the trend that the town centre is losing its competitiveness and attractiveness to shoppers and businesses in the face of expansion from competing centres.

- 5.3 To fulfil its strategic role as a Metropolitan Centre the Council promotes a mix of uses through the Area Action Plan. Policy BTC1 lays down the approximate amount of development which can be accommodated in the town centre. This includes around 42,000 square metres of additional retail floor space, around 7,500 square metres of additional food and beverage floor space, around 7,000 square metres of additional business floor space; around 1,820 residential units; around 4,000 square metres of additional leisure floorspace; around 3,500 square metres of additional community facilities; and up to three hotels. All these figures are "gross".
- 5.4 Bromley is a major centre for primarily comparison goods but there has been little retail development since The Glades was constructed in 1991. As two of the town centre's three department stores have recently closed it is essential to increase the attractiveness of the centre by increasing the quality and range of commercial activity. Some existing retail units, because of size, location and quality no longer meet the needs of modern retailers and there is a need to provide for future requirements in shopping. The Retail Capacity Study concluded that Bromley Town Centre could accommodate about 41,000 square metres of additional comparison gross retail floor space up to 2016.
- 5.5 The retail figure is to my mind indicative, in that the Bromley Retail Study Update 2009 recognises that the figure of 42,000 square metres would include a proportion of Class A2-A5 uses and that only about 25,000 square metres would be set aside for comparison goods and this could be supportable between 2016 and 2021.
- 5.6 I conclude that it is important to plan positively for additional retailing in the current economic climate to maintain the status of Bromley in the shopping hierarchy and support the additional expenditure on development and infrastructure towards the end of the plan period.
- 5.7 Bromley is a secondary office location compared with Croydon. The Economic Development and Employment Land Study (2009) highlights the importance of reinforcing the role of the office sector and its quality. From my visits I saw that at present much of the office development is outdated and not likely to be popular with modern users. Many of the existing offices are not attractive buildings and are in a secondary location. Regardless of the total floorspace which may eventually be provided, the role of the office sector needs to be reinforced with quality accommodation in the town centre, close to public transport.
- 5.8 The Consolidated London Plan identified Bromley town centre as an area where housing should be intensified as part of mixed use schemes with good access to public transport and community facilities, including open space. This plan provides for a minimum

of 4850 dwellings in the Borough by 2016/2017. The emerging London Plan (2008) attempts to increase the yearly figure in Bromley from 485 to 565 but this has been disputed by the Council and may well be reduced.

- 5.9 At present the town centre accommodates only 3.35% of the housing stock in the Borough. The close proximity of public transport provides an opportunity to significantly expand housing within the centre. New housing in the centre will also help to protect the suburban character of the rest of the Borough. All of this new housing needs to be complemented by a range of community facilities during the plan period. Provision is made in the Area Action Plan for around 1820 new homes in the centre as part of mixed use development.
- 5.10 The focus of development in the town centre will be the Opportunity Sites, to be phased over a 15 year period. The development of other sites which meet the objectives of the Area Action Plan may also come forward and if so the cumulative effects of these and the opportunity sites will be taken into account. It appears to me that the targets in Policy BTC1 provide a reasonable balance between uses in the redeveloped town centre. However, I do not find the housing figures critical. If they are achieved, the overall housing target for Bromley as a whole should readily be met.
- 5.11 Bromley town centre has no hotels and for an area of such large population is completely unrepresented in its provision for visitors. There is allocation in the Area Action Plan for appropriate opportunity sites to come forward during the plan period to remedy this deficiency. The hotels are supported by current negotiations for the development of opportunity sites and by the Greater London Authority.
- 5.12 There are two theatres in the town centre. The Churchill Theatre accommodating about 780 people and Bromley Little Theatre, an amateur theatre with 113 seats. There are opportunities in the Area Action Plan to improve the setting of The Churchill Theatre and there is also a recognised need to improve public areas. There also appears to be underused space in the complex to provide further for the arts if necessary.
- 5.13 Policy BTC1 can only lay down an approximate target figure for the redevelopment of the town centre, and for soundness Policy BTC2 should recognise the restrictions likely to be imposed on the redevelopment of sites affecting the character and appearance of the Conservation Area. I have dealt with this change at Issue 4 below.
- 5.14 I am satisfied that the overall mix of uses is sound.

**Issue 3 – Whether the policies in the Area Action Plan will lead to sustainable forms of development in the town Centre.**

- 6.0 It is for the Core Strategy to focus on critical spatial issues and to provide a locally distinctive framework on which other Development Plan Documents are to be based. However, in this case the Area Action Plan has been submitted for approval prior to the submission of the Core Strategy, which is in course of preparation. I am satisfied that there are good reasons for this early submission.
- 6.1 Firstly, the Unitary Development Plan was adopted in July 2006 and together with the South London Sub-Regional Development Framework, it sets out the basic strategy which the Area Action Plan will follow. The Area Action Plan is also in accordance with the Sustainable Community Strategy (Building a Better Bromley - 2020 Vision)(March 2009) for improving the quality of life within the Borough. It seeks to deliver planned growth, stimulate renewal of the town centre; protect and/or enhance the existing environment and promote sustainable development through comprehensive improvements.
- 6.2 Both the Greater London Authority and the Government Office supported the need for the early submission of the Area Action Plan in advance of the Core Strategy to facilitate growth and address development proposals comprehensively.
- 6.3 The Area Action Plan is a Borough priority in the Consolidated London Plan wherein Bromley is designated as a Metropolitan Centre, requiring local policies to exploit and enhance the accessibility of the town centre, provide for a full range of town centre functions and sustain and enhance vitality and viability. This is proposed through an increase in retail, leisure, community and business services to meet the needs of a growing population.
- 6.4 Although there was some concern regarding primary and secondary frontages, there was no specific evidence on the restriction on financial services. Key active frontages are shown on Diagram 2.3 and on Diagram 4.1, and from my visits around the centre I found the designation logical. The Unitary Development Plan may have restricted financial services in primary frontages but the Area Action Plan does not contain any additional restrictive frontage policies which would preclude central area financial sector uses from retail frontages. It was confirmed by the Council that its approach to such uses would be in accordance with government advice in Circular 03/2005. I am satisfied that no change to the plan is required for soundness.
- 6.5 In my view the Area Action Plan focuses on those sites which are expected to be redeveloped to provide expansion and regeneration on the basis of mixed use schemes, in accordance with national and regional guidance, including commercial and

leisure uses, housing and the promotion of sustainable transport modes.

### Tall Buildings

- 6.6 The Area Action Plan is intended to provide criteria and key design principles to guide future development. Although there was concern about Policy BTC19 Building Height, the policy is supported by Diagram 4.3 which indicates Views and Protected Sites. Even if, as some representors say, not all important views have been included, the criteria in the policy itself makes it clear that proposals for taller buildings will be required to follow the guidance set out in the English Heritage/Commission for Architecture and the Built Environment's Guidance on Tall Buildings (2007). There are also additional safeguards in the Key Design Principles for opportunity sites where taller buildings may be considered.
- 6.7 I have also had regard to the effect of taller buildings when dealing with individual opportunity sites below. It seems to me that some of the concerns about tall buildings are related to the implementation of policies in former plans, where the policies have not stopped some poor developments taking place.
- 6.8 Of the 12 opportunity sites, tall or taller buildings are proposed for consideration on only 4 sites. I do not consider it needs a comprehensive character appraisal of the whole town centre to determine whether the approximate location shown for 4 taller buildings is reasonable.
- 6.9 It was suggested at examination that to guide development a range of heights should be considered for each site. I do not share the view that this would be helpful. I accept that some representors are concerned about what are considered to be weaknesses in the planning application system, under which planning committees occasionally permit some forms of development which are not popular with residents or local societies. Regardless of this, if the development is to achieve a balanced mix, ultimately the determination of the height, form and massing can only be satisfactorily decided upon when there is a detailed proposal to consider and its full impacts can be assessed.
- 6.10 Paragraphs 4.7.20, 4.7.21, 4.7.22 describe the topography of the town centre in relation to taller buildings and the policy itself makes it clear that an assessment will be required as part of any planning application.
- 6.11 Other representors would like the Area Action Plan to specify exact heights and precise numbers of dwellings for opportunity sites. However, this type of "zoning by-law" planning merely superimposes an arbitrary standard, and one approach, devised

by the Council, on to the development of a site. The Council's more flexible approach allows for creative design from developers and their architects. Accordingly I am satisfied that the plan is sound and no changes are required.

#### Medical Facilities

- 6.12 With the proposed large increase in housing within the town centre, the provision of expanded community facilities at the appropriate time is essential. This provision is well covered in the Area Action Plan with the exception of improved medical facilities viz: the need to expand existing group practice provision within the town centre. It is apparent from the concern of local doctors that greater emphasis needs to be put on direct consultation with the practice rather than leave it to PCT liaison meetings. The consultation process is needed for central Bromley to ensure that medical premises are fit for purpose and provided when they are required to meet the needs of the expanding population. I have recommended appropriate consultation in Appendix 3 **(IC1)**.

#### Public Transport Accessibility

- 6.13 Bromley Town Centre has good rail and bus links, although both stations are in need of improvement. The Public Transport Accessibility Level in the London Plan (a measure of relative level of access provided by public transport) is mostly 6a for this area, which is a very high value. The Area Action Plan recognises the merits of the existing system but also accepts that the quality of service and road capacity require improvement. Accordingly I am satisfied that the plan is sound and no changes are required.

#### Retail Development Policy

- 6.14 The revised wording to paragraph 2 of Policy BTC4 regarding retail development, suggested by representors at the examination, is preferable in that it makes it clear that there is a difference between prime retail units and smaller independent units. The change **(IC2)** was discussed during the examination and was not controversial and it was supported by the Council.

### **OPPORTUNITY SITES**

- 6.15 **Opportunity Site A** (OSA) consists of Bromley North Station and adjoining land. Part of the vision of the Area Action Plan is the creation of a Northern gateway for the town centre which would deliver a new market, affordable homes, improvements to the existing railway station and bus terminus, new community facilities, retail and office uses together with public realm improvements.
- 6.16 Because of the size of the site, if full land assembly could not be achieved, less comprehensive schemes would be possible.



Although I do not consider the comprehensive development of the site is critical in terms of deliverability over the plan period, maximum visual improvement would best come from a fully integrated scheme.

- 6.17 However, although the freehold of Northside House is held by Network Rail, the development lease granted in 1983 was for a term of 125 years. The building has subsequently been sublet and provides reasonable quality office space with 2 residential units at roof top level. It is unlikely that this unattractive building would be replaced at an early stage and cannot be developed as part of a comprehensive scheme for the remainder of the site. I see no reason to change paragraph 5.2.5 for soundness as this merely says that the development *could* allow for the replacement of Northside House.
- 6.18 It has been argued by representors that this is a site with suburban characteristics and, because of this, development of it should be restricted. Although I agree with the view that the 800m distance criterion from the Metropolitan Centre is a crude measure to define a central area use, from my visits I found this site to have mainly central area characteristics and uses, with a close relationship to the adjacent key public transport hub and interchange for the town.
- 6.19 The Council has carried out a modelling exercise for the site which indicated a way forward. The scheme was dominated by a multi storey car park and the relationship of building blocks would not appear to provide an adequate public space, or for the best location for tall buildings. However, the urban design analysis suggests that around 250 units would be appropriate for this site and this was supported by a financial appraisal based on September 2007 values. I accept for the present this may no longer be economically viable but the Area Action Plan delivery period is flexible.
- 6.20 Although local residents would like a definite height restriction, an agreed number of houses, and an agreed layout for the site in the Area Action Plan, I do not consider this to be a practical exercise for the Council to undertake. With its range of uses it is not a site that lends itself to the Council producing a detailed Development Brief. Such a restrictive approach would not encourage flexibility in design. This is a complex site which has to be redeveloped in a viable and attractive way with a balance of mixed uses to achieve success.
- 6.21 There are a number of ways the site could be developed, and these have to allow for the integration of the needs of various users, and also respect the setting of the site. I believe there is no need at this stage to be further prescriptive than the wording of the policy itself and the key design principles set out on page 175. The ultimate relationship of uses and density of housing will

only become apparent when a comprehensive scheme is prepared, taking into account local context and listed buildings. There are 19<sup>th</sup> Century residential buildings to the north of the site and Bromley North Rail Station is a Grade 2 listed building. The area consists principally of 3 to 4 storey buildings with others ranging from 7 to 10 storeys in height. If 400 housing units were to be accommodated on site I consider the height of buildings on OSA would need to be significantly increased.

- 6.22 Planning Policy Statement 3 advises in Appendix B that net dwelling density is calculated by including only those site areas which will be developed for housing and directly associated uses. From Appendix 1 of the evidence of Boyer Planning and BNP Paribas Real Estate the various drawings do not convince me that the massing of development could be increased to 400 dwelling units without significant change in the balance of uses on the site.
- 6.23 I, therefore, do not consider it realistic to change the wording of the present policy. The policy is flexible in that it states "Around 250". To change the policy to "At least 250 dwellings" would impose an unreasonable planning burden on the Council to accept a scheme without knowing whether in planning and design terms a particular number of units could be accommodated.
- 6.24 As the developers have suggested, the key to achieving a successful development on this site is the ability to foster a good relationship between surrounding areas in terms of scale, connectivity and integration. However, according to the notes of the meeting held on 1 March 2010 with the Greater London Authority no net residential area had been defined to enable a reliable density figure to be produced in accordance with advice in PPS3.
- 6.25 It also seems to me that some of the costs shown, such as those involved in the provision of affordable housing and financial obligations in a Section 106 agreement may need to be re-negotiated to enable some development to take place. If over the years the market housing situation does not improve and a viable scheme cannot be agreed the Council will have to monitor likely development of the site to assess whether it should be in a later phase, or look to other Opportunity Sites to provide the required office and retail floor space. Although OSA is an important gateway site its development is not closely related to the development of other sites within the town centre.
- 6.26 The level of future car parking has been questioned and I share the view that on a site at a public transport interchange the total parking provision of 618 cars is high. However, although the station car park is underused, South East Trains are determined to retain the existing number of spaces (219) for future growth. There are 66 spaces at Northside House and these will have to be retained because of the conditions of the lease. The Council car

park has 83 spaces. There is some flexibility on residential parking, depending upon the type of units provided. To serve the site a multi-storey car park is unlikely to be viable and deck parking should be provided. This decked car parking will be required regardless of the number of units.

- 6.27 Because of its overall character I consider this site to be more suited to 1-2 bed units than larger family units but the policy merely includes provision for family housing. With such development the London Plan Car Parking Standards aim for a reduction to less than 1 space per unit where 1-2 bed units are provided. In this location at a transport interchange I see no reason why the parking provision for dwellings cannot be reduced further, even if this results in a lower market value for some units. The wording of the policy does not need change as there is no specific figure for car parking mentioned in Policy OSA.
- 6.28 It was suggested during the examination that further safeguards are required to protect existing residential amenity. As Policy BTC17 already requires development to respect local context, built heritage and character, and to protect existing residential amenity, I do not consider additional criteria are required.
- 6.29 **Opportunity Site B** (OSB) is located in the Conservation Area on the corner of Tweedy Road and London Road and has been the subject of a planning application and a dismissed appeal. In my view the proposed scheme did not comply with the criteria now contained in Policy OSB or the Key Design Principles for the development of this site shown in the Area Action Plan. The criteria laid down in the Area Action Plan, to guide the future development of this site, have been modified (**IC11**) by me to reflect the decision and the conservation area analysis by the Inspector who dismissed the appeal. I agree that the quadrant on the corner of the junction should be kept open but accept the view of the Council that it would be preferable for it to be included within the site rather than remain a no mans land outside of it. Changes for soundness are dealt with in Issue 4 below.
- 6.30 **Opportunity Site C** contains the old Bromley Town Centre Hall, a listed building and an important feature of the townscape. I am satisfied that the criteria and key design principles for the development of the remainder of the site and the rehabilitation of the listed building would provide appropriate guidance for the future development of the site.
- 6.31 **Opportunity Site E** (OSE) - It is proposed that The Pavilion leisure centre should be relocated from OSE to the Civic Centre site and the existing site of the leisure centre be used to expand retail facilities within the town centre. In my view this is a logical and practical way to provide part of the increase in retail floor space identified as an important element of the plan. The site is in the same ownership as The Glades so there is no obstacle to

the expansion of retail floorspace, other than the relocation of the leisure centre. Also as the relocation is to the Civic Centre site which is in the ownership of the Borough Council again there should be no ownership obstacle to the development.

- 6.32 I see no need for a leisure centre to be retained as an integral part of the shopping area, and the Civic Centre site, (OSF) on the edge of the town centre, offers an early opportunity to relocate the leisure centre to enable the redevelopment to take place. It also seems to me that if land to the west side of the High Street OSG does not come forward as quickly as expected there is flexibility to bring forward OSE first.
- 6.33 **Opportunity Site F (OSF)** - This site accommodates the Civic Centre, including the listed building, Old Palace (1775), which forms part of a quadrangle of more recent civic buildings. It has the setting of Bromley Palace Gardens which is an enclosed but underused public open space. Pedestrians mainly gain access to the site via the pedestrian bridge over Kentish Way. These gardens include a number of listed structures. Criteria in the Area Action Plan require that new development must respect the existing footprint with no loss of open space.
- 6.34 Apart from safeguarding residential amenity and the setting of the listed building, both of which are listed in the Key Design Principles for OSF, I consider the redevelopment areas chosen by the Council are appropriate for the purpose. I am satisfied that the leisure centre could be relocated on the site and the floor space would be sufficient to replace the facilities which already exist. Although trends in leisure change over time, I share the concern of some residents that if a swimming pool is not provided at the outset it will be lost from the town centre.
- 6.35 I see little need for housing on this civic centre site and if the low density housing could not be accommodated I do not consider this would be a real loss in planning terms.
- 6.36 The listed Old Palace at present forms part of an unacceptable quadrangle but a well designed leisure centre could take advantage of the outlook towards the Old Palace. I find the policy seeks to enhance assets and appropriate active use of the site.
- 6.37 **Opportunity Site G (OSG)**, combined with OSN, is considered by the Council to be the key to the change in retail character of the High Street. Part of OSG falls within the Bromley Town Centre Conservation Area. This site may be the key to future comprehensive development, although in my view OSE - The Pavilion Site, will be far easier to develop comprehensively for retail uses than OSG.
- 6.38 Unlike other opportunity sites, where I consider a degree of flexibility is required, and has been allowed for in the policies and

the key design principles, on OSG there are unfortunately a number of imponderables to consider on which there is a lack of robust evidence. The Council envisage a phased development of this large area but the diagrammatic plan in the Area Action Plan provides little guidance as to how comprehensive development could occur and how development of parts of the site would be related to the whole.

- 6.39 The Area Action Plan is a delivery document. I accept that because of its size and location OSG has potential for redevelopment. However, if it is to be redeveloped comprehensively there needs to be far greater certainty about the form of development which should take place, and whether certain existing buildings need to be included, or excluded, from such redevelopment. There are many ownerships and land interests here and I consider a more prescriptive approach is necessary.
- 6.40 Under paragraph 5.7.4 the Council will encourage the use of different architects for different phases of the development. However, there is no robust overall guide for architects or developers to produce schemes as part of an integrated whole, or to assess whether such an approach would be achievable.
- 6.41 A decision also needs to be made about the importance of certain local buildings, such as 44 High Street, the Laura Ashley Building, and 72/84 High Street to determine whether they should be retained, and if so how their retention would influence the redevelopment and layout of the remaining area.
- 6.42 I found the small enclave of dwellings in Ethelbert Close to be inharmonious in this town centre location. The layout of the dwellings has a poor relationship with the park. However, this appears to be a popular cohesive housing area in the town centre, apparently with a high level of social inclusion. I consider it necessary to clearly show through a Master Plan approach how the land occupied by this group of houses would form part of any comprehensive scheme, to enable an assessment to be made whether the expansion of retailing and/or new housing on to Ethelbert Close is justified and how it could ultimately be laid out and achieved.
- 6.43 From my visits I found the area of OSG to be so large and so diverse, and in a mixture of ownerships, that I have no doubt there are a range of opportunities for extensive redevelopment to take place, with the opportunity for a taller building somewhere on the site without detriment to the townscape. However, without a Master Plan to direct and justify the form development should take I do not find OSG on its own to be robust enough to guide future comprehensive development.

- 6.44 I conclude that a Master Plan is necessary to supplement OSG so that the Council can be fully aware that its comprehensive proposals are viable and achievable and that developers, land owners and residents are also fully aware of what is proposed and how it could be implemented, based on the elements I have identified above.
- 6.45 OSG is a key site for, in particular, the expansion of retailing and housing in the centre, during Phase 2/3 of the Area Action Plan, but it is already recognised in the Area Action Plan at Policy BTC30 – Phasing - that should development of OSG be delayed, development on OSE and OSF could be brought forward to facilitate retail provision in the town centre. Meanwhile, early work will be required by the Council in the preparation of a Master Plan for this key High Street location. Many of the objectives and key design principles have already been established for this area west of the High Street during the preparation of the Area Action Plan and these can readily be incorporated into the Master Plan.
- 6.46 I have recommended a change in the introduction to OSG in Appendix 3 (**IC3**) to supplement the policy with a Master Plan.
- 6.47 **Opportunity Site J** - Bromley South Station is the major gateway into the town. Its importance is not currently reflected in the poor building quality both within and outside the station. The criteria to deliver improved facilities, including improvements to the station buildings, improved public transport facilities, re-development of retail units opposite the station and other public realm works to provide a public square should ensure appropriate future regeneration of the site. From my visit I do not consider that a taller building would inherently be out of place here subject to the key design principles laid down in the Area Action Plan.
- 6.48 **Opportunity Site K** (OSK) - Westmoreland Road Car Park. The existing multi-storey car park is an unattractive building in a Central Area location which does not bear a good relationship with adjacent buildings or its setting. There is an opportunity to provide a mixed use development to enhance this part of the town and improve links and visual relationship with the Bromley South Station and the High Street. The site was proposed for redevelopment in the Unitary Development Plan and the present proposal is for a cinema led development, with a mixture of central area uses including a hotel. There is currently no hotel in Bromley Town Centre. I am satisfied from the representations that the site is suitable for the uses envisaged and that there is sustained interest in developing the site.
- 6.49 There is considerable local concern about the impact that this development would have on The Empire cinema which has been in use for some 70 years. It has been upgraded and is further programmed for improvement, probably dependent on the outcomes of the Area Action Plan. With the competition it may

well close although the Council consider it could become a specialist arts cinema. The cinema operates at present in a highly competitive market and has needed to diversify its operation to include education and social activities.

- 6.50 Cathedral Group plc, the preferred partner to the London Borough of Bromley, has had three expressions of interest from cinema operators to develop OSK and has already selected Vue cinemas. It has also had two offers and one expression of interest from hotel operators. These interests are still ongoing despite the recession.
- 6.51 Regardless of the possible detrimental effect on the existing cinema I cannot say that OSK is unsuitable for the uses proposed. At present I understand that 28.5% of cinemagoers travel to Bluewater and 21.6% travel to Beckenham. My concern is whether Policy OSK as written is justified and I am satisfied that it is. Whether the Council should support the adaptation of the existing cinema, which is not before me in the Area Action Plan, in preference to supporting a new multi-plex which is expected to encourage cinema goers to stay within the town is a local decision, as is the competition between uses and how it affects the future overall provision of leisure facilities within the town centre.
- 6.52 It appears that in paragraph 5.9.3 the Council accepts that if the development of OSK impacts on the commercial viability of the existing cinema the building should be reused for alternative entertainment or cultural purposes. As the Empire is a local "anchor" this may mean a greater concentration of activity at the southern end of the town with a reduced footfall in Bromley North Village. However, this balance in footfall may well change anyway because the major retail expansion is expected to occur on sites at the southern end of town.
- 6.53 **Opportunity Site L** - DHSS Building and Bromley Christian Centre. The existing DHSS building which is at present vacant is an unattractive block forming a stop to development at the southern end of the town. The location of the site near Bromley South Station makes it very suitable for a hotel led development and, in terms of visual impact, any development in this gateway location will need to be of the highest quality. I do not consider this design criterion, nor the important view, to be a reason not to consider a taller point building on part of the site as long as the remainder of the development forms an attractive stop and vista, and also allows views through to the wooded ridge beyond. For example a taller building in the position shown in the indicative diagram could create a focal point and would not read directly with St Marks Church to the west.
- 6.54 I accept that the London Plan encourages local authorities to exceed housing targets particularly in locations which are highly

accessible. This site has a PTAL6 rating for the highest level of accessibility. Under the London Plan density matrix the site may well be able to deliver a higher density than that shown but I consider this should clearly be a hotel led development and because of the important vista which I have identified above the site would be sensitive to taller buildings which would block the view. The Council has related its density figure to its assessment of the share of uses on the site. If the Council decide that none, or that only some, of the existing office floorspace should be replaced I agree that the density of housing could be increased. For soundness I have formally recommended this flexibility in the policy in Appendix 3 **(IC5)**.

- 6.55 The Employment Land Study projections for office floorspace are higher than the London Office Policy Review 2009. The Area Action Plan target of 7,000 square metres for offices could be met without this site but early replacement of *modern* offices is needed in the town centre and with its particular characteristics it is not clear when OSC would come forward.
- 6.56 Activity and vitality at ground floor level would depend on the design of the hotel and the relationship with community and other commercial uses, which could include small retail units. I find the policy is flexible on the replacement of office floor space, as the policy merely requires the *appropriate* replacement of existing floor space. If the Council is satisfied that the target of 7,000 square metres is going to be met on other sites it may not require office floor space here. This should be reflected in the wording and I have recommended accordingly. This would be in accordance with paragraph 4.4.9 of the supporting text which reflects the Economic Development & Employment Land Study (March 2009).
- 6.57 I see no reason why small retail units, perhaps linked to the hotel, should not be considered but these would be a minor part of the development and ancillary to the remainder of the proposal. The Council accepted that there would not be a retail capacity issue if small retail units were permitted on site **(IC4)**.
- 6.58 The Bromley Christian Centre is located on the site, but is a separate entity. Attempting to develop comprehensively would mean a temporary relocation of the Christian centre elsewhere. Although it would be desirable, I do not consider it essential that this use needs to be developed with the other central area uses proposed. Therefore, the Christian Centre should remain within OSL to ensure an integral development, but it could be redeveloped separately **(IC6)**.
- 6.59 This site is affected by Policy BTC23, or more specifically by Diagram 4.5 which accompanies it, and indicates the safeguarding of land for transport schemes. Although I do not consider the wording of the policy itself to be unreasonable, as it is flexible



enough to provide for mitigation, I am concerned about the extent of safeguarding shown on Diagram 4.5.

- 6.60 From the highway evidence at the hearings it became clear to me that there may be a number of ways to provide for improvements, not necessarily as severe in land take. Although the details of the bus priority scheme have been produced retrospectively as a guide, they have demonstrated that it provides good assistance to bus travel through the junction without causing the junctions to exceed theoretical capacity. It also seems to me from my visit that some improvement will be necessary to the Masons Hill/Westmoreland Road junction. Work on the Transport Strategy during 2008 demonstrated the need for a dedicated bus priority on the southern approaches to the town.
- 6.61 The study by Savill Bird & Axon (SBAX) took into account traffic reductions related to OSG and also that policies in the Area Action Plan are to make a step change and this would significantly reverse the decline. The consultants used observed data rather than TRICS and TRAVL database analysis an approach I consider acceptable. The scheme is to be funded as part of the A21 Bromley Southern Approach Transport Scheme as the Council needs to ensure that these bus priority measures are carried out during the life of the Area Action Plan.
- 6.62 However, I believe it would be sound to indicate the safeguarding by means of a thick line along the roadside showing that some form of improvement will be required. The extent of any land take can then be determined depending upon the details of a submitted scheme. This change would also need to be reflected in Diagram 4.5 and paragraph 5.10.2 of the supporting text and I have recommended accordingly in Appendix 3 (**IC7 & IC8**).
- 6.63 **Opportunity Site M** - Queens Gardens is a protected open space and is within the Conservation Area. I found from my visits that it is generally well used and tranquil but it has "dead spots" which are underused and there are possibilities to make better use of these hardened areas. Although it is adjacent to The Glades and The Pavilion, there is little indication at present of a close relationship between Queens Gardens and the adjoining buildings. Queens Gardens are also clearly divided from the Civic Centre site by the barrier of Kentish Way.
- 6.64 With redevelopment of The Pavilion there will be an opportunity to make better use of Queens Gardens as an integral part of the shopping area. Active A3 uses around part of the edge were previously identified in the adopted Unitary Development Plan and café or restaurant facilities would make use of currently underused hard standing area and increase the overall use of Queens Gardens by the public. Eating and drinking are well recognised recreational uses of open space. The Diagram on page 197 is misleading in that it shows a site on the northern edge of

Queens Gardens which would intrude into a planted area. The Council has suggested a proposed change to delete this which I agree with.

- 6.65 It seems to me from the examination that a range of options may come up for consideration as either temporary or more permanent solutions to provide café or restaurant uses in connection with Queens Gardens. These could include breaking through the main wall of The Glades to provide a facility within the building itself, with probably some limited outside use, so that customers can take advantage of Queens Gardens. Some of the people using the café would be garden users anyway. Another option would be to provide a similar facility in the future retail extension to The Glades on to The Pavilion site.
- 6.66 In the meantime a café could be provided on the terrace or on part of the hardstanding area shown diagrammatically on page 197. With Belgo already in existence offering a bar and eating facility at the entrance to The Glades, the viability of other than a small scale café in the short term to serve those using Queens Gardens might be in some doubt.
- 6.67 **Opportunity Site N** - Central Library and Churchill Theatre. This seems to me to be an underused facility and could contribute more to the arts. This principle is already recognised in Policy OSN.
- 6.68 **Opportunity Site P** – Sainsburys, West Street. This site has been included in the Area Action Plan, so that guidance can be given on infrastructure requirements and development criteria. However, Sainsburys is already operational and successful in this location, and the Area Action Plan objectives are not dependent upon the scheme for this site. There is, therefore, flexibility in its timescale. I have dealt with the impact of this proposal on the environment at Issue 4 below.
- 6.69 **I recommend the changes (IC1-IC8) which I have listed in Appendix 3 to make the document sound.**

#### **Issue 4 – Whether the Area Action Plan policies will promote and maintain quality environments**

- 7.0 Bromley town centre has a strong architectural heritage with a number of listed and locally listed buildings. Part of the town centre is within the Conservation Area. Most of the listed buildings are within this Conservation Area and Bromley North Village, although there are some individual buildings which are listed, or are of local interest, in the southern part of the town centre. Unfortunately, over the years a number of buildings of uninteresting design and massing have become interspersed with historic and attractive buildings. There is also a lack of distinctive landmark buildings in the town centre. Nevertheless, there is still

opportunity under guidance in Planning Policy Statement No 1 to protect and where possible enhance the natural and historic environment and existing successful communities.

- 7.1 Despite its recognition as a Metropolitan Centre, the area has experienced physical and economic decline over many years. Department stores have been lost and office and retail vacancy rates are high in the area. It is evident from my visits that only substantial investment and redevelopment within the centre can reverse this trend.
- 7.2 I have dealt elsewhere in my report with the sustainability of the development proposals in the Area Action Plan at Issue 2 above and do not repeat it here. I merely consider the impact of the proposed regeneration on the environment.
- 7.3 Although concern has been expressed about the Council's overall assessment of the character of the town centre, there has been an analysis of the Historic Context (Diagram 1 and text), Urban Context and Structure (Diagram 2.3 and text), Spatial Strategy (Diagram 3.2), Public Realm Strategy (Diagram 4.2 and text), and Views and Particular Sites (Diagram 4.3 and text). All of these studies are helpful and go some way in identifying key buildings and frontages, views and vistas and landmark buildings, but they do not replace the holistic approach required for the Conservation Area in a Conservation Area Appraisal.
- 7.4 However, although there is no Conservation Area Appraisal in place, during the course of my examination it was stated that the Conservation Area Appraisal will be drafted between now and July 2010 as support for the emerging Core Strategy and reported to the Development Control Sub Committee in August.
- 7.5 I am concerned that this document was not available to support the Area Action Plan, and do not consider that the Supplementary Planning Guidance on the Conservation Area is a detailed enough substitute, but am now satisfied that by the time my report is submitted and the Area Action Plan is adopted by the Council, the Conservation Area Appraisal should be well enough advanced to form a basis for decisions affecting the Conservation Area.
- 7.6 Use of the emerging Conservation Area Appraisal should ensure that decisions in respect of Opportunity Sites which fall within, or have a material impact on the Conservation Area, will be taken on the basis of the criteria laid down with the advice of English Heritage. Therefore, I consider it important for soundness, that regardless of the criteria listed to guide development in the Opportunity Site policies, it is stated clearly in the Area Action Plan that the overriding consideration for those Opportunity Sites which have an impact on the Conservation Area will be the criteria in the appraisal, to ensure that new development enhances and or

preserves the character and appearance of the Conservation Area **(IC13)**.

- 7.7 There are of course other ways to assess the merits of proposals and their impact on listed buildings or conservation areas. A development brief can be prepared for a particular site, or an assessment carried out on the basis of the criteria laid down by English Heritage at the application stage.
- 7.8 Although a holistic approach is preferable, the Planning Inspector who dealt with the appeal in respect of OSB was well able to provide a detailed analysis of the site and surrounding area on an ad hoc basis as part of the planning process, more than sufficient to dismiss the appeal. The Area Action Plan will be a more up to date document than the appeal decision but any developer who ignores that well argued decision would do so at considerable risk.
- 7.9 The Urban Appraisal which analyses the townscape and built form goes some way to identifying key views and important buildings. It also identifies the key issues and design objectives for the centre as a whole and for the historic environment by assessing the character areas and key land uses. The Council has also defined 6 character areas in the Area Action Plan, described their key characteristics, and produced a Spatial Strategy for these character areas, together with Diagram 3.2.
- 7.10 Although some representors believe that the Area Action Plan policies should be more prescriptive, even going as far as saying that modelling is required to determine the precise number of housing units, and the height of buildings, I do not agree (even in respect of OSG, where I believe a more prescriptive approach is required than that taken by the Council). The precise number of housing units and the height of buildings can only be realistically determined when a comprehensive scheme for a site has been prepared and negotiated.
- 7.11 The acceptable height of a building will depend on its design, whether it is a point block or a slab, where it is located on the site in relation to adjoining uses, what impact it would have on important views, neighbouring properties and its compliance with daylighting and sunlighting standards.
- 7.12 As I have reported above the Area Action Plan makes it clear in Policy BTC19 – Building Height - that any tall buildings will need to be assessed on the basis of guidance from English Heritage and the Commission for Architecture and the Built Environment.
- 7.13 I accept that in this Metropolitan Centre the Housing Matrix in the London Plan must be given due consideration. However, from my visits to the area it seems to me that for the Opportunity Sites within the Conservation Area too much emphasis is put on density in Policy BTC2– Housing Density. I also find paragraph two (not

numbered) to be ambiguous and in need of rewording. It states that the number of residential units to be accommodated on the Opportunity Sites should be in general conformity with the indicative *numbers* identified in Policy BTC1. The indicative number of dwellings in Policy BTC1 is a total housing figure for the opportunity sites in the town centre and can give no indication of the appropriate level of development for an individual opportunity site. Also as some of the opportunity sites are sensitively located in a conservation area, density of housing, or intensity of development, should not be the prime consideration (**IC9 & IC10**).

- 7.14 Although habitable rooms per acre is a more concise method of measuring density than number of units, as housing numbers are only one factor in the consideration of the mixed use development of opportunity sites, and unit numbers are not critical, I see no reason to impose yet a further measurement in the criteria on density for the opportunity sites.
- 7.15 It is argued that the housing implementation strategy should contain contingency plans in the event of certain sites not producing the numbers of dwelling units proposed. I have said elsewhere that I do not find the housing numbers critical to the borough as a whole. Also these housing numbers are only related to the Opportunity Sites which have been identified. I saw other sites and areas within the town centre which have not been specifically identified, probably because of their size or shape, where additional housing and other development may well occur during the plan period. There are also likely to be other sites coming up for development in the remainder of the Borough during the plan period.
- 7.16 **Opportunity Site A** – Bromley North Station is on the edge of the Conservation Area but I do not find it to be an integral part of the character of that area. I have dealt with the sustainability and impact of the proposed policy at Issue 3 above.
- 7.17 **Opportunity Site B** – Tweedy Road/London Road now has a detailed brief as a result of the Inspector's appeal decision. I have commented on this site above where sustainability is considered. For soundness I have changed the wording of the policy to reflect the appeal decision (**IC11**).
- 7.18 **Opportunity Site C** – Former Town Halls and South Street Car Park - This is not in my view controversial in that any development will have to respect the listed status of the existing buildings in the area and require sensitive conversion of the listed building. I believe the policy and Key Design Principles laid down will provide sufficient guidance on the future development of the site.

- 7.19 **Opportunity Site M** – Queens Gardens. I have dealt with this site in some detail above and consider a flexible approach is necessary because of various options available either in the short or longer term.
- 7.20 **Opportunity Site N** – Central Library and Churchill Theatre. The provision of a town square can only be assessed when a detailed proposal is considered for the development, or comprehensive development, of the buildings to the south of site N, shown as part of OSG.
- 7.21 **Opportunity Site P** – Sainsburys, West Street. Because of the impact on the views from the College only low rise development would be appropriate for College Slip and this has been recognised by the Council in its assessment. Although any development would need to be set back to enable planting and hard surfacing and to avoid a building dominating College Slip, I do not believe the car park or the view from it is of such significance that it needs to remain open at the northern end to allow glimpses of Bromley College and the cedars.
- 7.22 On balance, a sense of enclosure to the north of OSP would be preferable to retaining the openness of the car park. As the Council argued such enclosure would also help in creating cohesiveness with the rear elevations of properties in the High Street. I consider the Key Design Principles in the Area Action Plan should provide adequate safeguard against future inappropriate development. With the changes **(IC12)** I have made to the criteria in OSP to protect Bromley College, and with a well designed building that creates a sense of enclosure, the future expansion of Sainsburys should enhance the character and appearance of the conservation area.
- 7.23 Therefore, subject to the following changes I find the environmental impacts to be justified, effective and in accordance with national policy.
- 7.24 **I recommend the changes (IC9-IC13) which I have listed in Appendix 3 to make the document sound.**

**Issue 5 – Whether (i) the Area Action Plan is sufficiently flexible to provide for the delivery of development and cope with changing circumstances, and (ii) there is appropriate and adequate monitoring of its effectiveness.**

- 8.0 The town centre has faced a decline in retail offer and is currently underperforming. Its retail offer needs to be much improved to support its role as a Metropolitan Centre.
- 8.1 The Area Action Plan identifies Opportunity Sites to provide the major development during the plan period, although I saw from my visit that there are other smaller sites which might also come

forward on an ad hoc basis, as they are not large enough for comprehensive development. Of the Opportunity Sites some are partially linked to the development of other Opportunity Sites such as OSG and OSN. There is a close link between the development of OSE and OSF but otherwise the Opportunity Sites, because of their location and proposed uses can be developed independently.

- 8.2 As the link between most of the sites is tenuous there is flexibility for their independent development subject to appropriate infrastructure provision.
- 8.3 I have dealt with the flexibility in the delivery of development on the Opportunity Sites when I considered the sustainability of the proposed development on the individual sites above. Otherwise the Phasing incorporated into Table 6.1 is flexible enough to allow for change. Development proposals in Phase 1 can come forward without new major infrastructure and provision for transport investment.
- 8.4 Key Transport measures are listed in Table 6.2 - Transport Strategy implementation - and Indicative Budget Costs are shown in Appendix 9. These are broken down into Annual programmes.
- 8.5 With the present financial crisis there is some doubt about housing completion rates in the early part of the plan period and disposable incomes are likely to decrease. This may well also have an impact on the commuted sums available under Section 106. Fortunately, the larger developments proposed in the Area Action Plan are in later phases, but even so there was strong indication from the hearings that some opportunity sites may come forward to application stage in the short term through the Council's preferred partners. This is despite the early delivery phase of the plan taking place in economic circumstances very different to those at the time the plan was in preparation.
- 8.6 Although there may well be uncertainty in the future it seems to me that the Council has in its phasing recognised this and has as far as possible linked development to available public realm and transport funding. Also with important transport funding already in place, delivery of the Opportunity Sites should be effectively managed.
- 8.7 There will be a need to carefully monitor the Bromley Retail Study Update to assess any change in shopping patterns over the period against the retail target in the Plan. I note, however, that retail related permissions and completions are a monitoring indicator in Section 7 - Monitoring Mechanisms.
- 8.8 I consider the flexibility and the monitoring aspects of the Area Action Plan to be sound.

## **Minor Changes**

9.0 In addition to the advertised changes which accompanied the Area Action Plan the Council wishes to make minor wording changes to the submitted Plan in order to clarify, correct and update various parts of the text. These changes do not address key aspects of soundness. I have made only reference to one of these recent changes in my report, otherwise no specific mention of them is made. These minor changes are incorporated into the Appendices 1 and 2. The Appendix 2 changes came out of the public examination. I have considered these changes and endorse them on a general basis in the interests of clarity and accuracy.

## **Overall Conclusions**

10.0 I conclude that with the changes I have made the proposals for the town centre are realistic, have been justified by a sound evidence base, would be effective and are consistent with national policy. I also conclude that the London Borough of Bromley Town Centre Area Action Plan satisfies the requirements of s20(5) of the 2004 Act and meets the soundness criteria in Planning Policy Statement 12.

*Eric T Searle*

INSPECTOR

**Appendices** (incorporating Appendices 1 and 2 of focused changes and schedule of minor changes put forward by the Council and Appendix 3 with the Inspector's recommended changes.)



**Bromley Town Centre Area Action Plan**  
**Appendix 1 - Table of Council Changes already proposed and published (as Regulation 30[e])**

This table includes a list of proposed changes to the November 2009 (Regulation 27) area action plan, that have been proposed and published (as part of Regulation 30[e]) prior to the public hearing sessions of 30th March to April 2010.

The table comprises of three types of changes:

1. Points of clarification, factual and grammatical corrections which are supported by the Council.
2. Minor changes which are points of clarification arising from representations and are to which the Council are not opposed.
3. Change that is necessary to meet changing legislation or government policy to ensure that the document is up to date when adopted.

In each case, the nature of the proposed change is identified, and the reason for it specified.

<b>Location</b>	<b>Proposed amendment</b>	<b>Reason for change</b>
<b>General</b>		
Policies BTC8, BTC9, BTC11, BTC12, BTC13, BTC14, BTC16	Remove references to UDP policies which have not been saved – ER1, 3, 4, 6, 8, 12, 13, 14, 15	Update. Direction received on saved policies
Diagram 1.2, 2.3, 4.1 etc.	Alter boundary line of the AAP and opportunity sites, where necessary, to coincide accurately with property boundaries (see attached map)	To correct discrepancies arisen during development of the plan, due to the scale of the maps
<b>Contents</b>	Update Page Numbering	Update for Adoption
<b>Foreword</b>	Update Foreword as it relates to Submission draft	Update for Adoption

<b>Preface</b>	Remove Preface as it relates to Submission draft	Update for Adoption
Sections 1.1.1 -1.1.3	Relates to Submission draft, delete and start at Section 1.2.1	Update
Diagram 1.1	Label should read "Bexleyheath" not "Bexley"	Correction
Section 1.3.4	Remove reference to examination and soundness tests.	Not required in adopted plan
Section 1.3.14	Refers to Council's application to Save UDP policies in July 2009 Update - After "...adopted in July 2006" delete remaining text and replace with: "and under the Planning and Compulsory Purchase Act, the policies were saved for three years. In July 2009, a Direction was received to allow further retention of most of the policies until they are superseded by new policies in forthcoming DPDs."	Direction received on saved policies

Section 1.3.16	Delete first sentence. First sentence will be confirmed through independent Examination.	Update
Section 1.3.18	Line 21 Correct spelling of "wellbeing"	Typographical Correction
Section 1.3.19	In first sentence after "Core Strategy" insert "which will set the strategic policies for the borough." Delete remainder of sentence.	Clarification & Update
Section 1.3.20	Delete, duplicates Section 1.3.19	Repetition
Section 1.4 Evolution	Remove section - delete paragraphs 1.4.1 to 1.4.5	Update. Refers to AAP development process
Section 1.5.2	Delete "Draft" before "AAP"	Update refers to the Submission version

Section 1.6.1	Delete "proposed Submission"	Update
Section 2.1.1.17	Reference to community facilities under housing may read more clearly under a new sub-header "Community Facilities" before paragraph 2.1.1.17	Clarification
Section 3.2.1	Replace "Diagram 3.1" with "Diagram 3.2"	Typographical Correction
Section 3.2.6	Sections 3.2.6 – 3.2.7 on Sustainable Community Strategy need to be summarised and moved to after 1.3.18 in Context section	Update. Background context and not Vision
Section 4.1.2	'Community Plan' should read 'Sustainable Community Strategy'	Update
Section 4.1.6	Wording implies AAP will deliver Sustainability Appraisal objectives , which is incorrect . Delete paragraph as wording is not necessary in adopted plan.	Clarification and Update
Appendix 4	Appendix 4 relates AAP Policy linkages which are not appropriate in the adopted version of the Plan.	Update
Policy BTC1	Key Diagram relates to Diagram 4.1	Clarification and Update
Section 4.2.2	Add to Section 4.2.2 `The additional new floorspace figures in the Policy BTC1 are additional to the existing quantum in the Town Centre."	Clarification
Section 4.3.1	Replace "Community Plan" with "Building a Better Bromley"	Clarification and Update
Section BTC2	Policy BTC2 relates to residential development and not just residential densities. Amend title to read "Policy BTC2 - Residential Development"	Correction

Section BTC3	<p>Re-title policy "BTC3 – Promoting Housing Choice"  Delete bullet points and replace last sentence with:  "All new housing will be required to meet Lifetime Homes (or subsequent) standards and at least 10% of units within each scheme should be specifically designed to be suitable, or capable of being adapted without further structural alteration, for occupation by a wheelchair user, in accordance with current best practice"</p>	Clarification and future-proofing of the Policy
Section 4.3.8	Delete last sentence	Appendix being removed
Section 4.4.3	After "...gross retail floorspace up to 2016" add "The Retail Capacity Study was updated in 2009 and the figure revised to 42,000 square metres." "catchments" should read "catchment"	Update
Section 4.4.5		Correction
Section 4.6.1	Amend the last sentence to read "The Council will be committed to joint working with key partners such as the Environment Agency"	Clarification and Update
Section 4.6.6	Replace first sentence with: "The AAP seeks to ensure that a significant proportion of the energy supply to new development comes from decentralised, renewable and low carbon sources, on-site where feasible."	Clarification and Update in response to GLA representations
Section 4.6.8	Delete first sentence.	Clarification and Update in
Section 4.6.14	Paragraph needs to be reworded to make clearer through bulleting SUDS and drainage measures.	Update for Adoption
Section 4.6.17	Delete last sentence, text is not relevant to AAP	Clarification and Update

Section 4.7.7	Include reference to 'Building for Life Standards'	Clarification and Update
Sections 4.7.8 4.7.19	Text needs to be summarised as it repeats content contained in Appendix 3 and 7.	Update for Adoption
Section 4.7.21	Replace "Appendix 4" with "Appendix 7"	Correction
Section 5.2.5	Add 'The 2000 sq m of B1a Office space is additional to existing office floorspace including Northside House'	Clarification and Update
Section 5.3.2	Delete Section and it repeats content of Sections 5.3.1 and 5.3.3	Clarification and Update
Policy OSC	Remove the word "net". 5000sq m new floorspace is additional to existing office floorspace.	Clarification
Policy OSF	Final paragraph, first sentence, relating to protection of existing open space, to be deleted as it overlaps with final sentence.	Clarification and Update
Policy IA2	Missing word. Add 'of' after designation in sentence one.	Clarification and Update
Table 6.1 Delivery Strategy	Site E Flexibility. Add sentence ' If deliverability and viability constraints inhibit the relocation of the leisure centre by the start of Phase 3 then this would require an early review of the AAP in respect to comparison retail provision.	Clarification and Update in response to Government Office for London representations
Section 6.3.3	Replace "APP" with "AAP"	Correction
Section.6.5.2	"compliment" should read "complement"	Correction
Section 6.5.9	Correct the total of the Investment Programme to read "£52.95 million"	Correction
Section A1.47	Delete paragraphs A1.47 to A1.50	Formatting error

<b>Appendices</b>			
App 4 – linkages	Delete		Redundant
App 5 – lifetime homes	Delete		Not required in the plan
<b>Transport strategy</b>		Update for Adoption	
Objective 2	Amend objective to read "to build further traffic capacity in support of the new development <b>as identified in the AAP</b> ".		Clarification and Update in response to Highway Agency representations
Objective 4	Amend objective to read "To seek to minimise <b>the traffic and transport</b> impacts generated from the developments <b>alongside</b> commercial viability considerations.		Clarification and Update in response to Highway Agency representations

## **Bromley Town Centre Area Action Plan** **Appendix 2 - Table of Council Changes Arising from the Public Hearing Sessions**

This table includes a list of proposed changes to the November 2009 (Regulation 27) area action plan, arising out of the public hearing sessions of 30th March to 14th April 2010.

The table comprises of three types of changes:

1. Points of clarification, factual and grammatical corrections which are supported by the Council.
2. Minor changes which are points of clarification arising from representations and are to which the Council are not opposed.
3. Change that is necessary to meet changing legislation or government policy to ensure that the document is up to date when adopted.

In each case, the nature of the proposed change is identified, and the reason for it specified.

AAP Reference	Nature of the Proposed Change	Reason for the Change
Para 1.3.7	Insert - Superseded by PPS 4 (Planning for Sustainable Economic Growth, Dec 09)	Update
Para 4.7.4	Insert - Superseded by PPS 5 (Planning for the Historic Environment, 2010)	Update
Appendix 1, A1.8	Insert - PPS 6 (Planning for Town Centres) and PPS 4 (Industrial, Commercial and Small Firms) have been cancelled and replaced a consolidated PPS 4 (Planning for Sustainable Economic Growth)	Update
Appendix 1, A1.21	Insert – PPG 15 (Planning for the Historic Environment) has been cancelled and replaced with PPS 5 (Planning for the Historic Environment)	Update
Appendix 7	Site E (The Pavilion) Existing Situation, second bullet point – amend to read “...Elmfield <b>Road</b> that detracts from these street edges. The frontage to Queens <b>Gardens</b> is also...”	Correction
Opportunity Site M (p.197)	Delete the development area shown to the north of Queens Gardens from the Opportunity Site	Agreed at the hearing sessions in discussion with Tony Banfield of the Bromley Civic Society
Transport Strategy Implementation – Fig’s 6.1, 6.2 & 6.3	The demarcation of opportunity sites needs to be consistent within these diagrams. In particular the incorrect inclusion of the Police Station in Fig. 6.3.	Suggestion by Michael Short (local resident) at the hearing sessions



### Appendix 3 - Inspector's Recommended Changes

Inspector Change No.	Change
<b>IC1</b>	<p>Add to third paragraph of Policy BTC1 after... development.</p> <p>"Direct liaison by the Council will take place with local medical practitioners on the provision of improved surgeries and medical facilities to serve the planned increased population in the town centre".</p>
<b>IC2</b>	<p>Delete second paragraph of Policy BTC4 and replace as follows:</p> <p>"New retail development on Opportunity Sites should provide for prime retail floorspace and complement and be fully integrated and well connected with existing retail facilities. The improvement of and extension to existing shops will be permitted provided they achieve a high standard of design and are well integrated with the rest of the town centre. Smaller units suitable for independent traders will be encouraged in suitable locations"</p>
<b>IC3</b>	<p>Add to first paragraph of Policy OSG after "key diagram"</p> <p>Detailed development will be on the basis of a Master Plan to be prepared and adopted by the Council. The Master Plan will determine the location, mix and amount of development. The targets for development are:</p> <p>Delete "Development will comprise"</p>
<b>IC4</b>	<p>Add further bullet point to Policy OSL:</p> <p>Small retail units may be acceptable as part of the hotel scheme to provide vitality at street level</p>
<b>IC5</b>	<p>Add to second bullet point of Policy OSL:</p> <p>Around 40 residential units "but the final density will depend on the appropriate level of replacement office floorspace."</p>
<b>IC6</b>	<p>Delete the last sentence of paragraph 5.10.1 and replace with:</p> <p>Although it is accepted that the DHSS building and the</p>

	Bromley Christian Centre can be developed independently, an indication of how they integrate one to the other will be required.
<b>IC7</b>	Amend Diagram 4.5 to show where road improvements may be required by means of a thick line along the road boundary.
<b>IC8</b>	Delete paragraph 5.10.2 and replace as follows:  A line is shown diagrammatically on Diagram 4.5 to identify where transport priority measures will be required on redevelopment. The extent of such measures will be identified at the planning application stage.
<b>IC9</b>	Add to first paragraph of Policy BTC2  "As some of the development will be on sensitive conservation area sites where development should preserve or enhance the character and/or appearance of the areas, density of development will not be the determining factor"
<b>IC10</b>	Delete the first sentence of the second paragraph of Policy BTC2 commencing "The number of residential units..... in Policy BTC1"
<b>IC11</b>	Delete the third paragraph of Policy OSB and replace with:  Although the density Matrix in the London Plan indicates the possible accommodation of around 70 units, because of the sensitivity of this site any proposal will be determined on the basis of the impact of the development on the character of the area; the retention of important views into the conservation area; a satisfactory relationship with housing which exists to the north; the recognition of the context provided by Bromley and Sheppard's Colleges; and to the effective landscaping of the site to integrate the development into the townscape.
<b>IC12</b>	Add a further sentence to OSP: Sainsburys, West Street on page 89. After "West Street." In the second paragraph add:  Any built development on the car park must not dominate the listed building to the north of College Slip or College Slip itself.

<b>IC13</b>	Add to the first paragraph of Policy BTC17 - Design Quality  Any development affecting the Conservation Area shall be assessed on the basis of the emerging Conservation Area Appraisal
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