



THE LONDON BOROUGH
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DEVELOPMENT CONTROL COMMITTEE

Meeting to be held on Thursday 26 July 2012

Please see the attached report appendices marked “to follow” on the agenda.

6 BROMLEY LOCAL PLAN - APPENDICES A-F (Pages 1-66)

Copies of the documents referred to above can be obtained from
www.bromley.gov.uk/meetings

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Living in Bromley - Renewal Areas – Working Draft

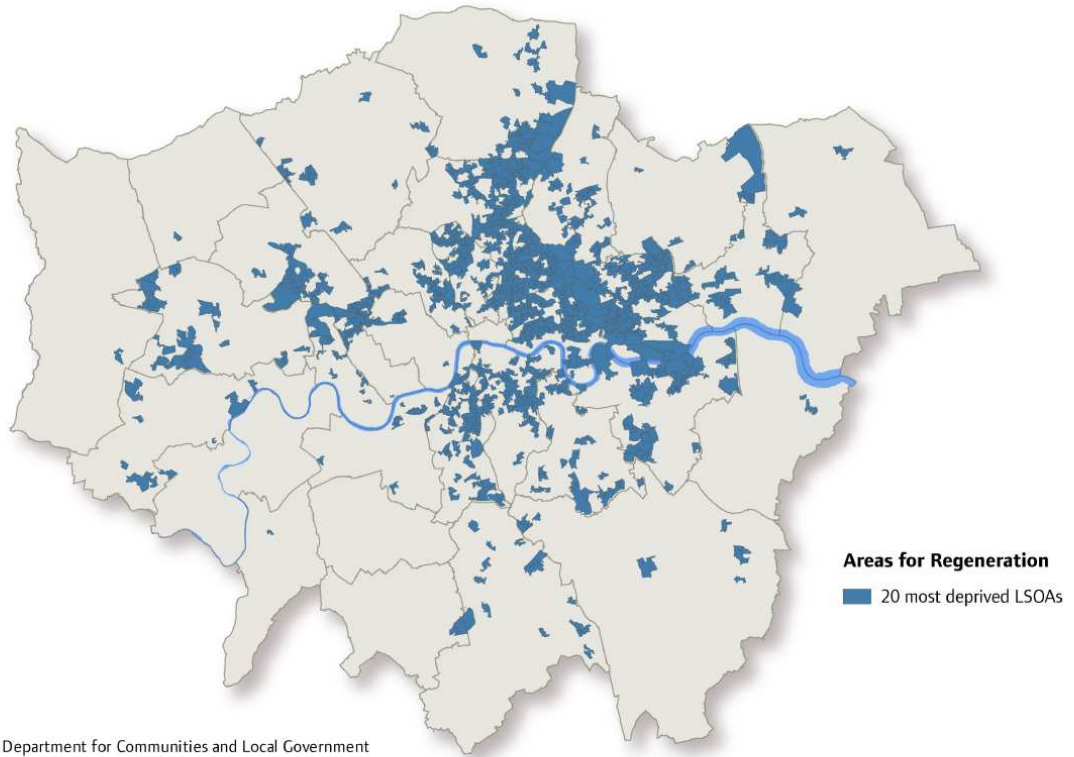
Introduction and Background

The Ministerial Forward to the National Planning Policy Framework advises that “Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives”

London Plan Policy 2.14 “Areas for Regeneration” states that “Boroughs should identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in locally-based plans, strategies and policy instruments such as LDFs”.

The London Plan Map 2.5 identifies 6 areas in Bromley, which fall within the 20% most deprived Lower Super Output Areas (LSOA's) as Regeneration Areas. The areas include:

- Betts Park area
- Maple Rd, Franklin Rd area
- Turpington Lane area
- Cotmandene Cres, Whippendell Way area
- Blacksmith Lane, Wooten Green, Rookery Gardens area
- Quilter Road, Ramsden area



Source: Department for Communities and Local Government
ONS Super Output Area Boundaries.
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Greater London Authority 100032379 (2009)

The London Plan Review Draft Consultation Plan (2009)



Key trends and issues

The London Plan highlights the 20% most deprived Lower Super Output Areas in London which are derived from information about

- income,
- employment,
- health deprivation and disability,
- education, skills and training,
- barriers to housing,
- crime.

Generally Bromley Borough scores favourably, however the pattern of scores (set out in detail in the Bromley Joint Strategic Needs Assessment (JSNA) 2011 is varied within the Borough, with concentrations of poorer scores to the north west of the Borough in Crystal Palace, Penge and Anerley, to the north in Mottingham, and to the east in the Cray Valley, as well as centrally through Downham and Bromley Common.

The London Plan advises that Boroughs should look to identify areas for regeneration. The areas highlighted on the map do not take account of the picture outside of these tightly drawn artificial electoral districts, or of the changes taking place in areas over time. Additionally the areas on the map do not include areas

where the Council and partner organisations and stakeholders have historically and are currently seeking to address renewal issues, notably additional areas within “Crystal Palace, Penge & Anerley” and the Cray Valley as well as parts of Mottingham.

The London Plan has been amended to reflect the NPPF and the draft amendments, (para 3.10) highlight that the development and regeneration of areas for regeneration (Policy 2.14) provide the greatest opportunity to improve health and reduce health inequalities.

Bromley’s Core Strategy Issues Document (2011) describes the distinct characteristics of the different “Places” within the borough, and set the scene for a discussion of issues in particular places. The areas highlighted in the London Plan (map 2.5) fall within “Places” considered through the Bromley Core Strategy Issues document which correspond with some of the areas which are likely to be subject to the greatest change and where plans may come forward through the Neighbourhood Planning process.

Duty to Co-operate

The Localism Act places a duty on local authorities to work together on planning issues. The NPPF expands on this, indicating that Local Plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.

2 Policy Options

Bromley 2030 Vision for the Borough Local Plan includes the desire to ensure that “Bromley is known for the high quality of its living, working and natural environments. The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives... Bromley has high levels of educational attainment.”

Much of the draft Local Plan Health and Wellbeing vision and objectives are specifically relevant

“The quality of life in Bromley has improved in all its neighbourhoods with all residents enjoying better health and wellbeing. Areas with a concentration of social and/or environmental difficulties are being improved. ...Residents are helped to improve their own places and local environments for the benefit of all the community. There is less crime and anti-social behaviour.

Objectives...

Co-ordinate the improvement of Bromley’s designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments.

Strategic Policy Options

Identifying Renewal Areas

Option 1 (Preferred)

Address “Areas for Renewal” rather than the “Areas for Regeneration

The specific areas highlighted in the London Plan Map 2.5 are “Lower Super Output Areas”, whose boundaries are based on enumeration districts. They produce irregular areas which do not reflect fully the situation that the Council understands on the ground, cutting through sites, estates and not fully revealing the picture beyond the artificial boundaries. In conformity with the London Plan the Council will define areas for regeneration which offer the potential to address the areas highlighted by the Mayor through the improvement and enhancement of the wider areas to be termed “Areas for Renewal”.

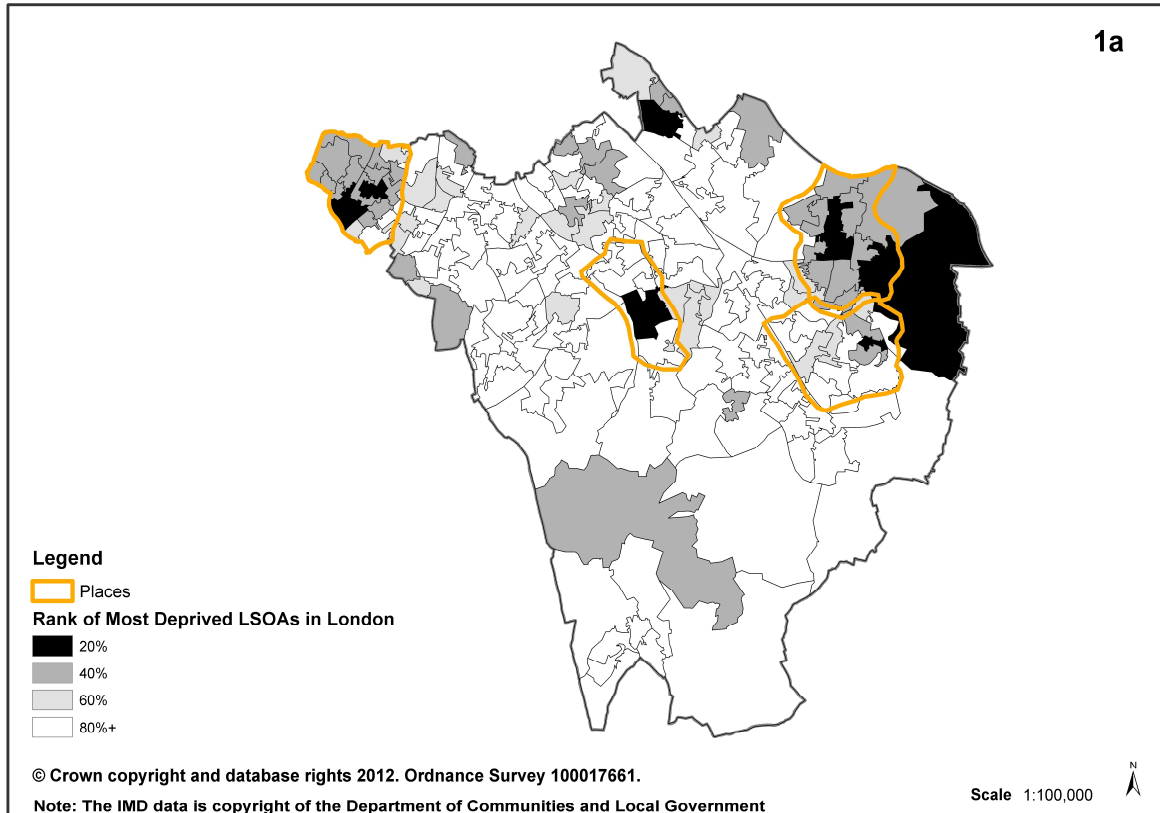
Identifying Areas for Areas

Option 1a (Not preferred)

Areas for Renewal based on locally understood places (containing areas highlighted on the London Plan Map 2.5)

Areas for Renewal based on the “Places” considered through the Core Strategy Issues Document which include the areas highlighted in the London Plan. This acknowledges that the renewal areas do not have such sharply defined borders. This also enables the Council to consider closely proposals in the vicinity to support regeneration:

- “Crystal Palace Penge & Anerley” including
 - Betts Park area
 - Maple Rd, Franklin Rd area
- “Bromley Common”
 - Turpington Lane area (substantially within “Bromley Common”)
- “Cray Valley, St Paul’s Cray & St Mary Cray”
 - Cotmandene Crescent, Whippendell Way area
 - Blacksmith Lane, Wooten Green, Rookery Gardens area
- “Orpington, Goddington & Knoll”
 - Quilter Road, Ramsden area



Option 1b (Preferred)

Places (containing areas highlighted on the London Plan Map 2.5) identified as for Option 1a but grouped where adjacent.

As for Option 1a but to look jointly at adjacent places to look across “The Cray Valley” combining the Core Strategy Issues Document places of

- “Cray Valley, St Paul’s Cray & St Mary Cray”
- “Orpington, Goddington & Knoll”

incorporating 3 London Plan Regeneration Area LSOA’s

- Cotmandene Cres, Whippendell Way area
- Blacksmith Lane, Wooten Green, Rookery Gardens area
- Quilter Road, Ramsden area

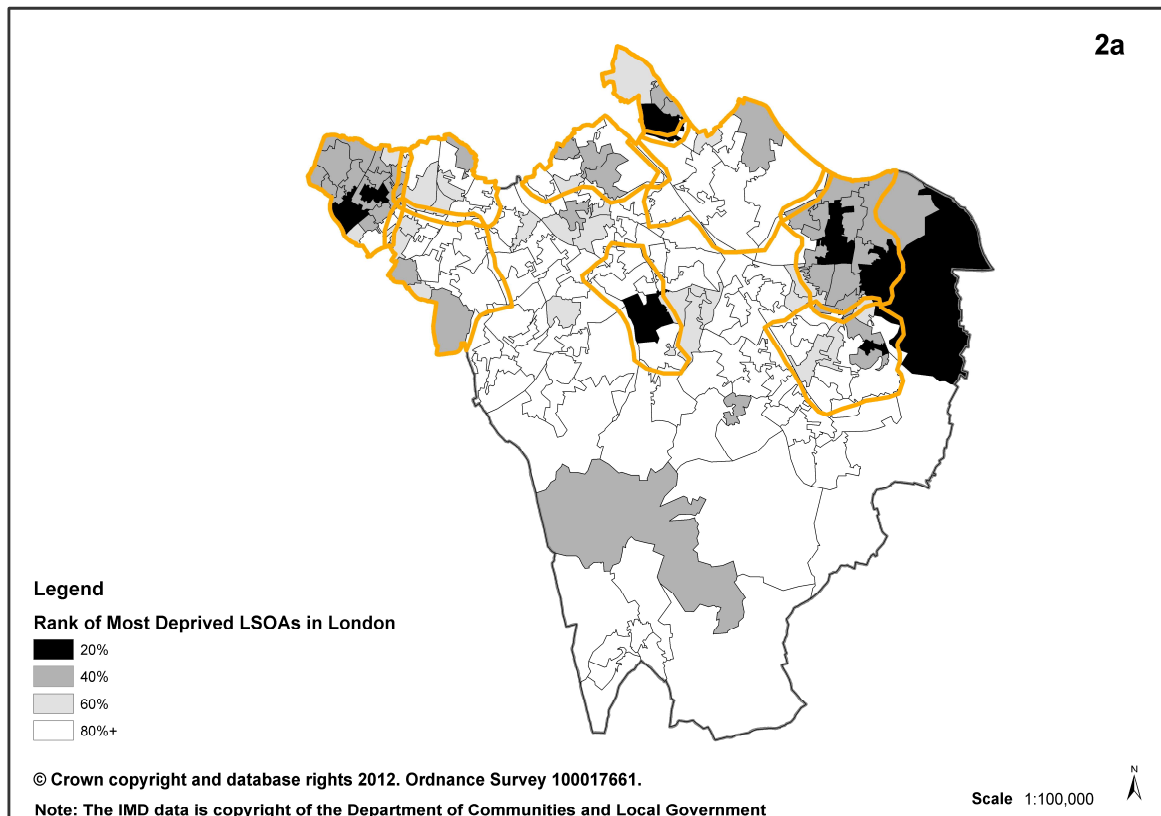
Adjacent Authority Regeneration Areas

Option 2a (Not preferred)

Additionally identify as Renewal Areas all Places abutting areas highlighted on the London Plan Map 2.5 in adjacent boroughs

Identify all places with cross borough abutting regeneration areas

- (i) "Clock House, Elmers End & Eden Park" (adjacent to Long Lane Croydon)
- (ii) "Beckenham, Copers Cope & Kangley Bridge" (adjacent to Bellingham, Lewisham)
- (iii) "Ravensbourne, Plaistow & Sundridge" (adjacent to Downham, Lewisham)
- (iv) "Mottingham" (adjacent to Grove Park, Lewisham, adjacent to Eltham, Greenwich)
- (v) "Chislehurst" (adjacent to New Eltham, Greenwich)

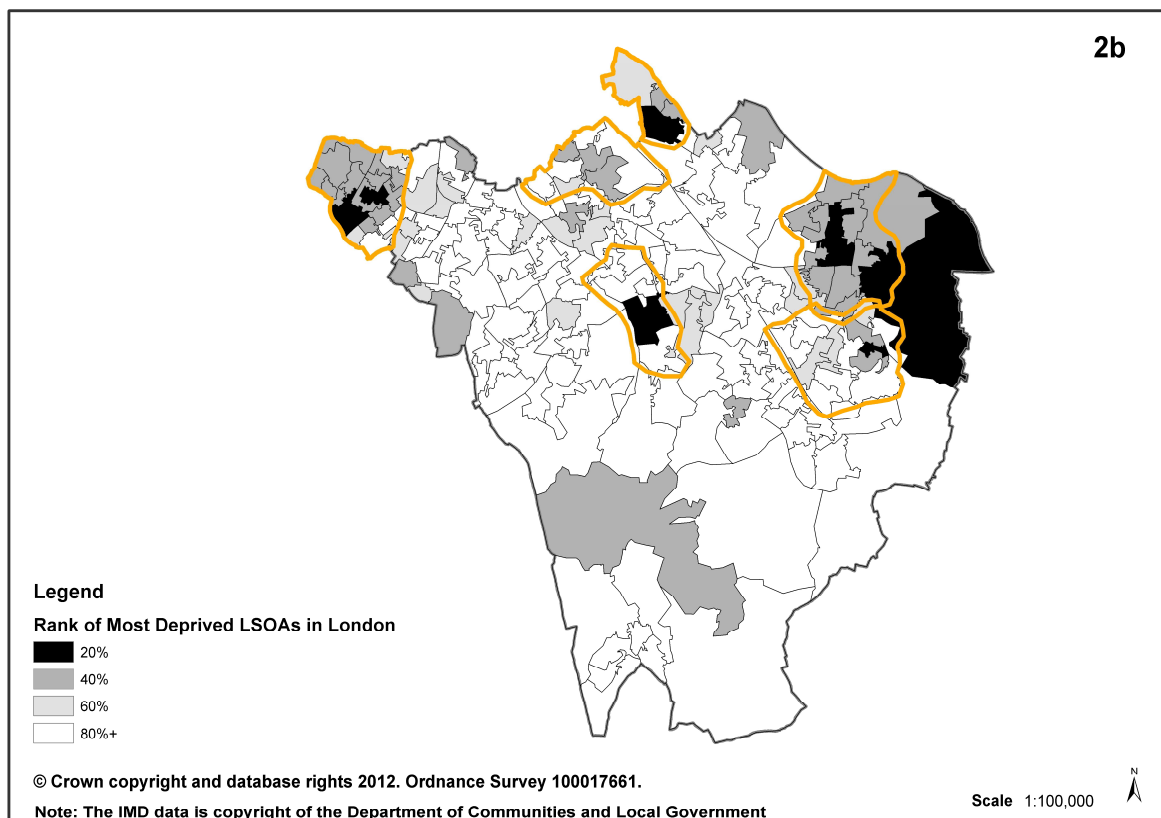


Option 2b (Preferred)

Additionally identify Places abutting areas highlighted on the London Plan Map 2.5 in adjacent boroughs, where estates cross borough boundaries

Additionally identify places with cross borough abutting regeneration areas where the borough boundary cuts across estates identified as Regeneration Areas in the adjacent borough.

- (i) “Ravensbourne, Plaistow & Sundridge” (adjacent to Downham, Lewisham). Bromley roads bounded by Rangefield Rd, Brook Lane and Southover clearly form part of the interwar “Downham Estate” which is identified as a Regeneration Area on the Lewisham side of the boundary
- (ii) “Mottingham” (adjacent to Grove Park, Lewisham, adjacent to Eltham, Greenwich)



Option 3 (Preferred)

Develop a cross borough policy to address the “Duty to Co-operate”

To address areas of pressure, particularly on social infrastructure, close to our shared borders with neighbouring boroughs, particularly along the urban & suburban boundaries to the north and west of the borough.

Development Management Policies

The “Living in Bromley – Renewal Areas” strategic options will be supported by development management policies and integrated spatial policies as required by the London Plan that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing.

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Supporting Communities – Options Working Draft

Introduction and Background

The provision and maintenance of appropriate infrastructure is a key issue for local communities. Bromley's communities are supported by a wide a range of services and facilities appropriate to different catchments, examples of which include the following:

- At local community level - GPs and clinics, primary schools and early years provision, village halls, churches, libraries, police safer neighbourhood teams, public houses and local open spaces,
- Facilities such as secondary schools and colleges, ambulance & fire stations and parks, have wider catchments within the borough
- The Princess Royal University Hospital (PRU), Bromley College of Further and Higher Education and the Churchill Theatre serve Bromley and neighbouring boroughs whilst the National Sports Centre and the specialist mental health services at the Bethlem (South London and Maudsley Trust) are used by people from London, the South East and nationally.

National Planning Policy Framework Core Planning Principles (para 17) states that planning should also take account of and support local strategies to improve health, social and cultural well being for all, and deliver sufficient community and cultural facilities and services to meet local needs.

The Equality Act (2010) general equality duty requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between people who share a relevant protected characteristic and people who do not.

Key trends and issues

Demography

Changes in population structure lead to different pressures on community infrastructure. The population in Bromley has risen by over 10,000 in the decade since the 2001 Census and expected to increase by a similar number over the decade to 2021. The largest increases in population are observed in both the young and the elderly:

- 0-19yr olds accounted for 24% of the Bromley population in the 2001 Census, with a marked increase in births since 2001, this group is projected to increase to 26.8% by 2026. Additionally, advances in modern medicine have resulted in more children with disabilities and complex needs surviving at birth and into later life.
- Bromley has the largest elderly population in London. The percentage of older people in the borough continues to increase and notably there is predicted to be a rise in the population aged 80 years to 5.6% of the population by 2021.

The main implications of these demographic changes include pressures on

- Health facilities
- Education facilities
- Community facilities (to support and quality of life)
- Recreational & cultural facilities (including provision specifically for youth)

It is also important to note that there are spatial implications of these changes, with the pattern of population growth varying between wards.

Health Infrastructure

The Local Plan will need to respond to changes in health provision & the resulting implications for health infrastructure

- Recent modernisation to the structure of health provision, for example the drive nationally to bring 50% of outpatient and secondary care activity out of hospitals, including minor surgical procedures and treatments, into community primary care settings
- There is considerable variation in the capacity of GP practices in Bromley, but GPs commonly work in smaller practices and with larger list sizes than the national average. More than a third of GP surgeries are not compliant with the Disability Discrimination Act, about half of which cannot be adapted to achieve compliance

Healthy Environments

Whilst the availability of health infrastructure (GP's) supports people with ill health, public health is significantly influenced by the environment. Bromley's Joint Strategic Needs Assessment (JSNA) 2011 describes the main issues relating to the life expectancy, quality of life and the wellbeing of the population as a whole and of people with specific needs. The Bromley JSNA 2011 concludes that

“key issues for further action are those which affect a large proportion of the population and where the situation appears to be worsening, these are:

- *Diabetes (for which obesity is a key risk factor)*
- *High blood pressure (Hypertension)*
- *Adult obesity*
- *Childhood obesity*
- *Anxiety / depression*
- *Dementia*
- *Support for Carers”*

The JSNA notes that numerous studies illustrate the direct benefits of green space to both physical and mental health wellbeing. The presence of green space also has indirect benefits, encouraging social contact and integration, provides space for physical activity and play, improves air quality. The built environment in Bromley can also support healthy lifestyles, through the encouragement of healthy modes of transport and by ensuring built environments appropriate to peoples needs (the JSNA specifically flags the impact of appropriate housing on both physical and mental health). The environments in which we live, work and relax can therefore have a significant affect on obesity and anxiety / depression, in

addition to the more obvious health impacts of the environment on asthma and pulmonary (lung) diseases.

Education Facilities

The increases in the birth rate since 2001 impact on services for children & families and have led to significant pressures in early years provision and the primary education sector, which is set to peak in 2018. Secondary school pupil intakes are similarly forecast to increase throughout the plan period. Additionally, there has been, and is likely to continue to be, increased numbers of children with special educational needs requiring educational placements and specialist care.

The statutory age for education and training is increasing to 18+ years by 2015 and the shape of higher and further education is currently changing with the recent merger between Bromley College of Further and Higher Education and Orpington College of Further Education. It is clear from the recent White Paper on education that the nature of post secondary education will continue to evolve over the plan period.

Access to a range of Community Facilities

The availability of local community venues across the borough is essential to enable locally accessible services and support people's quality of life, through support services, cultural and social activities. Community facilities often face challenges in finding or retaining sites due to the nature of the activities, the impact on residential amenity and to financial pressures. These facilities include for example, places of worship, local shops / Post Offices and public houses. Where facilities are re-provided in more appropriate buildings the challenge is to find an appropriate use for the redundant infrastructure which may include historic public buildings which may be listed or lie within conservation areas.

Leisure and Recreation, Play and Youth

The health and wellbeing of residents is supported by a range of sports facilities, to which private clubs make a significant contribution. There is good provision of parks across the borough however some lack the recommended quality of facilities and there are some areas outside the recommended 400m catchment for a local park.

The need for increased provision of facilities for children and young people is a recurring theme in consultations with the public, both to support the life opportunities for children and families and to divert young people from anti-social behaviour.

Allotment gardens present opportunities for outdoor activity and healthy eating. In much of the Borough there are long waiting lists for a plot

Spatial Issues

There is a spatial dimension to the demographic changes, to the historic patterns of existing provision and to transport access (notably in some suburban and rural locations). Included amongst the range of spatial issues the Local Plan needs to address are:

- the capacity of social infrastructure to meet the needs of the Borough over the plan period, particularly,
 - in areas of planned growth,
 - in “Areas of Renewal” based on the London Plan defined “Areas of Regeneration” (note separate paper on Areas of Renewal),
- opportunities to ensure the sufficiency and flexibility of community facilities in the “Places” in Bromley, including in particular:
 - town centres and local centres,
 - rural Green Belt villages,
- the impact of increasing pressures on social infrastructure from demand beyond the Borough boundary.

2. Policy Options

Bromley 2030 Vision

The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives... Neighbourhoods provide a choice of good quality homes, jobs and a range of shops and services appropriate to the different town, district and local centres... Bromley has high levels of educational attainment

Health and Wellbeing Vision

The quality of life in Bromley has improved in all its neighbourhoods with all residents enjoying better health and wellbeing. Areas with a concentration of social and/or environmental difficulties are being improved. Communities are served by local shopping parades, education, healthcare, leisure, community and cultural facilities, including libraries and places of worship. New facilities are encouraged in accessible locations to deliver flexible and efficient community hubs. The environment is designed to maximise accessibility for people with disabilities. Residents are helped to improve their own places and local environments for the benefit of all the community. There is less crime and anti-social behaviour.

Policy Objectives:

Produce healthier environments and infrastructure to support people in living fuller, longer, healthier, more sustainable lives.

Co-ordinate the improvement of Bromley’s designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments.

Neighbourhoods offer good quality homes and an accessible range of shops and services, appropriate to the roles of the different centres, from town centres to local neighbourhood centres and parades.

Ensure new community facilities are appropriately located to provide accessible effective modern services, and resist the net loss of facilities.

“New homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure” (“Homes” policy objective).

Strategic Options

Against the backdrop of increasing demands on community facilities outlined above. the Council will need to work with agencies and providers to ensure a wide range of accessible community, recreational and leisure facilities to support well being and enhance the quality of life of people in Bromley (in conformity with London Plan Policy 3.16).

Defining Community Uses

Option 1 (Preferred) Define community uses as per the London Plan (Policy 3.16 Social Infrastructure para 3.86).

Option 1a (Preferred) Additionally define local level facilities (as envisaged by the London Plan para 3.86) including informal recreational facilities.

New Community Facilities

The “Business, employment and the local economy” vision indicates that
“...centres, together with the district, local and neighbourhood centres, provide accessible shops, services and facilities for residents and wider communities across the Borough”.

And the related policy objectives read:

- § Encourage a diverse offer in town centres, including shops and markets, services, leisure and cultural facilities as well as homes.
- § Maintain and improve neighbourhood centres and parades across the borough to ensure locally accessible facilities.

Option 2 (Preferred) Develop a “Town Centre First” sequential test approach for community uses to prioritise:

- Town Centres / Village centres,
- existing community sites (hub creation),
- as part of major mixed use developments where no appropriate town centre location available,
- relocations to more accessible locations
(noting that for some uses e.g. day nurseries, a desirable geographical spread may also involve provision, additional to the locations identified as priority locations).

Option 3 (Preferred) Support for “hubs” - develop Policy to support mixed community use of existing buildings and encourage new community buildings to be designed flexibly for multiple use.

Burial Space

There is insufficient burial space capacity for the Plan period in parts of the Borough. The use as a cemetery and related facilities “which preserve the openness of the Green Belt” are appropriate within the Green Belt and there is therefore potential to examine opportunities to address this future need.

Option 4 (Preferred) To explore the opportunities for Burial Sites and allocate sites.

Options for Education

The London Plan (draft alterations 2012) highlight that “Local authorities’ strategic role in the new system will be to take a proactive, positive and collaborative approach to development that will widen choice in education, promoting a good supply of strong schools and encouraging the development of Academies and Free Schools. Local authorities will still be required to fulfil their statutory duty to secure sufficient school places within their areas.”

Option 5 (Preferred)
Work with agencies to ensure provision of appropriate educational facilities to cater for life long learning from early years.

Option 5a (Preferred)
A criteria based policy approach which considers the “need” for the proposed provision. The NPPF attaches great importance to the meeting the needs of existing and new communities.

Option 5b (Preferred)
Designate the sites of schools / colleges and purpose built day nurseries as “Education Land” and protect for the period of the plan. (This reflects approaches in neighbouring boroughs).

Option 6 (Preferred)
Assess pressure areas over the plan period and allocate sites as required.

Options for Health & Healthy Environments

The Health and Social Care Act 2012 (highlighted in the London Plan draft amendments para 3.9) gives boroughs an enhanced role in improving public health in their area. It advises that the implementation of a joint health and wellbeing strategy (through the Joint Strategic Needs Assessment (JSNA) process) will provide an opportunity to align strategies and programmes, including informing plan-making and development management.

Option 7 (Preferred)
Work with relevant health professionals to develop policies to support the appropriate provision of modern services (in conformity with London Plan Policies 3.2 & 3.17).

Option 8a (Not preferred)
Develop an explicit policy relating to producing healthy environments.

Option 8b (Preferred)
The impact of environments on health to be referenced throughout Local Plan policies.

Options for Leisure and Recreation

The “Open Space and the Natural Environment” vision indicates
“Bromley’s natural environment supports the wellbeing of its communities, with open spaces and trees providing healthy environments and space for leisure and sport”.

Smaller open spaces make an important contribution, not only to the physical appearance & sense of place, but to the physical and emotional health of local residents.

Option 9 (Preferred)
In addition to resisting the loss of Urban Open Spaces (UOS) designate and protect smaller open spaces where they make a contribution to the local community.

Option 10 (Preferred)
Assess the demand for allotments and seek to allocate additional sites.

Development Management Policies

“Supporting Communities” strategic options will be supported by development management policies be likely to include the following:

- Policy to support the needs of particular groups or communities and resist the loss of community facilities without appropriate re-provision (along the lines of UDP Policy C1).
- Specific protections for facilities important to local communities,
 - a local community / corner shops,
 - b pubs,
 - c theatre & local arts.
- Maximise opportunities for community activities to develop by requiring vacant retail units to be marketed for community use before (along the lines of UDP Policy S5).
- Encourage the cultural & leisure use of the public realm.
- Encourage the provision of health and sports facilities.

- Explore a criteria based policy to resist the over concentration of hot food outlets (e.g. proximity to schools).
- Policy to require community facilities appropriate to the scale of new developments (along the lines of UDP Policy C2 and in line with the NPPF para 38).
- Encourage effective use of education land e.g. dual use encouraged (along the lines of UDP Policy C8). new buildings should be designed to minimise the loss of open space (subject to other policies of the plan e.g. impact on amenity).
- Additional policies in response to Strategic Options.

Getting Around – WORKING DRAFT

Introduction and background

This paper deals with the Getting Around section of the forthcoming Local Plan. Bromley's transport networks are related to the distribution of the population, with better access and choice in the more densely populated areas, access to public transport is still limited in the rural areas. There is generally good access to central London via the rail network, and westwards towards Croydon via Tramlink.

The main transport pressures in the Borough are:

- Peak time traffic congestion associated with journeys to work and education;
- High car dependency and high mobility amongst much of the population;
- Relatively low public transport accessibility predominately in the south (particularly for orbital journeys);
- Social exclusion amongst those without car access or unable to use public transport;
- Low levels of walking and cycling; and
- External impacts on the local economy (centralisation of shopping and services).

Policy Options

Vision

Moving around the borough is easier due to reduced road congestion and improved public transport networks. Commuting traffic has reduced as more people share car journeys and choose alternative ways of working and travelling. Reduced road traffic results in less pollution and greenhouse gases from transportation. Any new development should where appropriate include electric vehicle charging points and there are more car clubs, increasing choices for local people. Walking and cycling to work, school and for leisure, has increased and the road environment is safer for vulnerable users. Public transport is more accessible to those with mobility problems and is safer and more reliable.

Objectives

Reduce road congestion at peak times through better management of the network and encouraging patterns of development that reduce the need to travel.

Supporting improvements to public transport links and facilitate environments that encourage walking and cycling.

Locate major developments where they can maximise the use of public transport.

Ensure new developments include electric charging points, cycling facilities and car clubs where appropriate.

Ensure streets are safe, accessible and uncluttered, improve road safety and reduce air and noise pollution from traffic.

National and London Plan and Local Plan Strategies and Local Implementation Plan Objectives

The National Planning Policy Framework (NPPF)

●● actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. (paras 17).

The Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (para 29).

Transport statements and Transport Assessments are still required for all sites that generate significant amount of movements (paras 32-34).
Travel plans are still included (paras 36).

Specific parking standards have been removed with local authorities encouraged to consider the accessibility, type, mix, use, availability of public transport, levels of car ownership, and the overall need to reduce use of high emission vehicles if setting local parking standards (paras 39-40).

London Plan 2011 Plus Parking tables to Chapter 6

Key points.

Transport for London (TfL) expect all new developments to be in compliance with the maximum parking standards as set out in the adopted London Plan. All new development in the borough is now (from April 2012) charged the Mayors Community Infrastructure levy of £35 per square metre towards the costs of Crossrail.

The Mayor's Transport Strategy (MTS) encourages the provision of publicly available charging points for electric vehicles, and it is likely that some new developments will be required to provide charging points. There already exists a Mayor's Electric Vehicle Delivery Strategy 2009. In general compliance with the London Plan the Council's focus will be to concentrate initially on providing charging points in its car parks situated in the main town centres of Bromley, Orpington, Beckenham, Penge and West Wickham.

Further regional getting around or access guidance is provided in 'Improving Walkability 2005', Manual for Streets 2, Accessible Bus Stop Design Guidance, and Wheelchair Accessible Housing Best Practice Guidance.

For ease of reference the London Plan Parking tables have been reproduced below because they relate to Option 1 later in this paper:-

Designated Blue Badge parking bays recommended in BS 8300:2009			
Building Type	Provision from the outset		Future provision
	number of spaces* for each employee who is a disabled motorist	number of spaces* for visiting disabled motorists	number of enlarged standard spaces**
workplaces	one space	5% of the total capacity	a further 5% of the total capacity
shopping, recreation and leisure facilities	one space	6% of the total capacity	a further 4% of the total capacity
railway buildings	one space	5% of the total capacity	a further 5% of the total capacity
religious buildings and crematoria	two spaces or 6% whichever is the greater.		a further 4% of the total capacity
sports facilities	determined according to the usage of the sports facility***		
<ul style="list-style-type: none"> • Parking spaces designated for use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get in or out of a vehicle and access the boot safely. • Enlarged standard spaces 3.6m wide by 6m long that can be adapted to be parking spaces designated for use by disabled people to reflect changes in local population needs and allow for flexibility of provision in the future. <p>*** Further detailed guidance on parking provision for sports facilities can be found in the Sport England publication Accessible Sports Facilities 2010.</p>			

Parking for retail

Maximum standards for retail uses: space per sq m of gross floorspace			
Use	PTAL 6 and 5	PTAL 4 to 2	PTAL 1
Food			
Up to 500 m2	75	50-35	30
Up to 2500 m2	45-30	30-20	18
Over 2500 m2	38-25	25-18	15
Non food	60-40	50-30	30
Garden Centre	65-45	45-30	25
Town Centre/ Shopping Mall/ Dept Store	75-50	50-35	30
<p>Notes:</p> <p>Unless for disabled people, no non-operational parking should be provided for locations in PTAL 6 central.</p> <p>Unless for disabled people, no additional parking should be provided for use classes A2-A5 in town centre locations.</p> <p>10 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.</p>			

Parking for employment uses

Non-operational maximum standards for employment B1: spaces per sq m of gross floorspace	
Location	
Central London (CAZ)	1000 – 1500
Inner London	600 – 1000
Outer London	100 – 600
Outer London locations identified through a DPD where more generous standards should apply (see Policy 6.13)	50 - 100
<p>Note</p> <p>20 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.</p>	

Parking for residential development

Maximum residential parking standards			
Number of Beds	4 or more	3	1-2
	2 – 1.5 per unit	1.5 –1 per unit	Less than 1 per unit
Notes: All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Adequate parking spaces for disabled people must be provided preferably on-site ¹ 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future. The forthcoming SPG on Housing will include a table setting out a matrix of residential parking standards that reflect PTAL levels.			

Local Objectives and current Policy

Bromley Local Implementation Plan (LIP) Objectives committed to deliver the Mayor’s Transport Strategy (MTS)

1. To reduce congestion on the road and public transport networks.
2. To maintain and enhance the economic and social vitality of Bromley’s town centres, and in particular to support the implementation of the Bromley Town Centre Area Action Plan over the next fifteen years.
3. To enable a genuine choice of travel mode for all journeys, appropriate to the purpose and length of the journey being made.
4. To promote the safe use of cycling, walking and public transport to improve access to services, facilities and employment, reduce peak time congestion, improve journey times, and limit emissions.
5. To improve in-borough and orbital connectivity, and to secure extensions of the Docklands Light Railway and Tramlink into the borough.
6. To enable multimodal journeys by improving integration and interchange.
7. To ensure that Bromley’s streets and other public places are accessible, safe, clean, uncluttered and comfortable spaces for people.
8. To improve accessibility to all forms of transport for people whose mobility is impaired for any reason.
9. To reduce the number and severity of road casualties, with particular focus on collisions that lead to death or serious injury.
10. To improve the environment and reduce air and noise pollution.
11. To maintain the borough’s transport assets in a safe and serviceable condition.

It is intended that all these objectives will be delivered during the lifetime of the Mayor’s Transport Strategy. i.e. by 2031.

Current Saved UDP Policies

The majority of the existing Saved UDP policies are NPPF compliant while others of a particularly Development Management nature serving local communities will need further clarity in the new Local Plan, along with new policies that will be derived by the options offered in this paper.

Development Management policies include:-

Transport Demand

Assessment of Traffic effects

Parking (and Appendix II) –*It is suggested this policy is revised to reflect local flexibility.*

Park and Ride

Access for People with Restricted Mobility

Pedestrians

Cyclists

Other Road Users

Public Transport (*Planning obligations related*).

Public Transport *inc Travel plans, transport contributions and road hierarchy*

New Accesses

Residential Roads

Unmade Roads

Unadopted Highways

Traffic Management- *inc Home Zones*

Traffic Management and sensitive environments

Servicing of Premises (and Appendix V)

Road Safety

Bromley Town Centre Area Action Plan Transport-Related Policies. Adopted 2010.

Policy BTC18 Public Realm

Policy BTC21 Transport Schemes

Policy BTC22 Public Transport

Policy BTC23 Land Safeguarded for Transport Schemes

Policy BTC24 Walking and Cycling

Policy BTC25 Parking

“Parking provision for non-residential development will be provided in the form of publicly available paid parking. A high standard of build quality and operational design (both for vehicles and pedestrians) will be expected for new car parks in the town centre, including personal security requirements. The Council will seek to reduce existing non residential parking provision where this is linked to the implementation of an approved Travel Plan. The levels of non residential parking should be consistent with the targets to reduce the level of single car occupancy journeys contained within the approved travel plan The Council will further develop and expand the Controlled Parking Zones around the town centre to mitigate the impacts of commuter and shopper parking. The Council will prioritise the use of on-street parking for shorter stays. Residents within opportunity sites will not be eligible

to acquire Resident's Parking Permits to park onstreet. The Council will encourage Park & Ride operations to be developed. Implementation of an initial Saturdays-only Park & Ride will be investigated, based on the Christmas Park & Ride operation.

The Council will support a full-time Park & Ride service, triggered by development in Phase Three, subject to further study, including identification of an acceptable permanent site with adequate environmental safeguards and a viable business case."

Policy BTC26 Phasing of Transport Improvements

Policy BTC27 Traffic Management

Policy BTC28 Car Clubs

Policy BTC29 Freight

LB Bromley Local Plan Issues Document (2011)

Appendix 1 to this paper summarises the consultation responses in relation to the Local Plan Issues document consultation - Autumn 2011.

The document included the *Getting Around* vision and specific transport issues and the following questions were posed.

- Can development be located so as to help reduce the need to travel, reduce road congestion and resolve parking difficulties?
- Can public transport (access) to employment areas be improved?
- Can the parking difficulties created by commuting and increased travel be managed to support town centres and the quality of life of the borough?
- Can accessibility to town centres, business areas, facilities and services be improved to meet changing demands?

Some of the responses to the questions are not within town planning or development management control but other comments have led to 10 options being devised (on the following pages) which potentially would then lead to Development Management policies being developed.

Getting Around Strategic Policy Options

Parking.

Option1.

Option 1a - PREFERRED

Apply Minimum local parking expectation for residential development (*to be devised as advised in the NPPF*), and the Council will also seek parking for all other uses to reflect the characteristics of the local area, including accessibility and in particular consider the impact on the environment, and congestion.

This option is in compliance with the NPPF (The Mayor of London is currently conducting a review of residential parking standards in conjunction with transport for London and with the advice of the Outer London Commission).

Option1b

Apply London Plan Maximum levels of parking spaces.

This is not a recommended option because London Plan levels do not reflect local expectation and circumstances.

Option1c

Develop London Plan levels of parking.

This is not a recommended option because London Plan levels do not reflect local expectation and circumstances.

Option 1d

Adopt Bromley Town Centre parking strategy boroughwide.

This is not a recommended option because the town centre has specific requirements and circumstances which do not apply boroughwide.

Relieving congestion

Option 2.

Option 2a - PREFERRED

Require new development close to known pinch points on the road network (identified in the Local Implementation Plan (LIP)) to incorporate mitigation measures to reduce congestion and the impact of the development on road congestions.

This option would allow developments which can contribute to the borough while contributing to reducing congestion or undertaking measures to reduce the impact of the scheme or further exacerbating the pinch point.

Option 2b

Not allow development close to known pinch points on the road network

This option would be very restrictive and potentially stop developments in these areas which if designed with measures to reduce congestion and the impact of development may be acceptable. Much of the congestion at pinch points is due to traffic travelling through the borough/area.

Option 3 - PREFERRED

The Council will encourage development where there is a high level of accessibility as measured by PTAL level.

This option promotes sustainable transport by encouraging patterns of development that reduce the need to travel.

Option 4 - PREFERRED

To promote the safe use of cycling, walking and public transport to improve access to services for all. Developments will be required to provide for safe and accessible pedestrian and cycle routes within schemes, and to public transport nodes, and local destinations such as schools, health centres and local shops and services.

This option builds on the principle set out in BTC24 and applies it across the Borough. "The Council will promote walking and cycling for shorter journeys. The Council will seek to improve facilities for pedestrians and cyclists, including safe and attractive road crossings, with a view to increasing walking and cycling. The Council will seek to ensure that the pedestrian environment is accessible to people with disabilities. Particular attention will be paid to all destination points including schools, employment etc."

Contributions or Community Infrastructure (CIL) related

Option 5- PREFERRED)

Give regard to increased demand for orbital cycle routes, requiring developments to contribute as set out in the forthcoming Council Transport Strategy.

This option promotes orbital travel and helps reduce congestion and relieves pinch points.

Option 6 - PREFERRED

Require developers and transport providers and operators to ensure accessibility to services including all public transport interchanges.

This option encourages access for all.

Option 7 - PREFERRED

Encourage improved bus routes and frequency with development contributing in line with any future Council Transport Strategy; in particular where public transport links do not exist or frequency is poor.

There are parts of the Borough, particularly in the south, and more rural areas where public transport is very limited. Improvements would be supporting better accessibility and assist quality of life.

Option 8

Encourage a major programme of road building to increase capacity, requiring developers to contribute as appropriate.

This option is not recommended due to the high costs involved as this option would impact on development viability and make unrealistic demands on the public purse.

Option 9 - PREFERRED

Traffic management schemes will be promoted to protect and enhance the local environment and particularly sensitive environments, in terms of historic buildings, conservation areas, Air Quality Management Areas with regard to safety, noise, environmental impact and pollution.

This option allows the Council to streamline policy areas.

Promoting Transport links

Option 10

Option 10a - PREFERRED

Promote the extension of the DLR to Bromley North (from Lewisham).

This option would support Bromley Town Centre and increase accessibility for residents to Docklands and other major employment centres as well the accessibility of Bromley as a destination, and reducing congestion on roads and rail.

Option 10b - NOT PREFERRED

Promotion of the extension of the Bakerloo line to Bromley North.

This is not a preferred option as it would not provide the same level of economic benefit to Bromley Town Centre.

Option 10c - PREFERRED

Promotion of the Croydon Tramlink Extension to Bromley Town Centre.

This option provides economic benefit to Bromley Town Centre.

Option 10d - NOT PREFERRED

Improving overground rail linkages between Bromley North and Lewisham.

This option is not recommended as it would impact on the case for the DLR extension.

Appendix 1

Summary of responses on Getting Around from the Issues consultation (see also DC Committee Report 17/11/2011 Item 6).

- Safe accessible uncluttered streets objective is welcomed. The problem for people with disabilities relating to shared space and street furniture was highlighted.
- The objective to encourage the use of public transport must be supported by improvements to the transport infrastructure.
- If cars are being discouraged and the rail system is at capacity, unless a viable alternative is found building more homes in Bromley should not be allowed.
- Should include improved rail/tram/DLR links, specifically rapid transport connections North and to the West i.e. Bromley North direct trains to Charing Cross and Cannon Street. Extension of tram from Beckenham into Bromley Town and beyond, and / or Extend DLR from Lewisham into Bromley.
- Should include development of cycle lanes.
- Sustainable transport should be encouraged throughout the Borough, through redevelopment opportunities which enhance public transport facilities, improve access and facilitate linked trips through to mixed-use developments.
- The Environment Agency support objectives and suggest inclusion of the following objectives:
Major development and or facilities should only be planned where they can maximise the use of existing public transport or secure new public transport facilities to and from major housing, employment, health, education and shopping.
- Ensure improved accessibility to the public transport network by promoting bus and highway development and enhancing the frequency of public transport, wherever appropriate.
- Support improvement to the quality of the network by the enhancement of facilities, infrastructure and user information.
- Seek developer and other contributions to the provision of and improvement to the public transport system.
- direct new development in the first instance towards sustainably located sites that fall within an existing defined centre. When new developments are located close to the main transport links, it will help to reduce car reliance and therefore road congestion and parking problems. It was argued that Bromley should therefore support higher density schemes which are located within walking distance to train stations with direct links to London.
- The setting up of park and ride schemes was suggested to encourage more use of High Streets which are often short of parking.

- The Highways Agency was concerned about any potential impact of developments on the operation of the M25, in particular junctions 3 to 5. These junctions experience high levels of congestion particularly during peak periods. There would be concern if any material increase in traffic were to occur on these sections of the Strategic Road Network as result of development in the Borough without careful consideration of mitigation measures.
- Adequate car parking arrangements were seen as important in giving people flexibility and choice in their lives. Cars place further strain on local traffic congestion. Car clubs in combination with good public transport options should help the higher density town centre flatted developments.
- Comments were received about policies to encourage companies such as Streetcar to set up in Bromley.
- GLA noted the maximum car parking standards for new residential developments have recently been abolished. However, they noted that TfL would still expect all new developments to be in compliance with the maximum parking standards as set out in the recently adopted London Plan.
- The Met Police recommended that the parking requirement for specialised land uses be assessed on an individual basis, having regard to meeting operational need (as supported by the London Plan, 2011) which seeks to ensure that the provision for parking at ambulance, fire and policing facilities will be assessed on their own merit. It was recommended the 'Getting Around' chapter of the emerging Core Strategy should therefore include the following wording: 'Car parking provision for emergency services including policing facilities will be determined by operational need and on a case by case basis, recognising that flexibility from the prescribed standards is required.'
- English Heritage highlighted their support for sustainable transport and measures to reduce the need to travel by car, due to the benefits this can have for the historic environment. Support was given for investment into the public realm to encourage and facilitate access and enjoyment of the historic environment.
- Improving accessibility to key economic areas of the Borough is essential to meet changing demands. Comments argued that opportunities should be taken through redevelopment and regeneration to ensure sustainable accessibility to key employment and retailing areas, enhanced design and sustainable design and construction.
- Bromley South does not have any disabled or pushchair access. Also neither does the Bromley North/Sundridge park line, (although Bromley North has disabled access, Sundridge Park does not) there is no ramp or lift access at Grove Park to the other platforms to enable access to get trains to London/Orpington.
- Direct line train service to London from Bromley North station. The current change at Grove Park adds 10-20mins to the commute each way.

- Provision of a network of accessible toilets and in particular “Changing Places” facilities in town centres was raised. Facilities would encourage people with disabilities to come to the Borough, employees and shoppers with disabilities who are less mobile, thus relying on accessible key transport hubs to get around the Borough.
- Transport infrastructure cannot cope with additional infill housing which in turn puts public transport under considerable pressure and increases car use. Issues were raised that public transport in the Borough is relatively poor in comparison to other London Boroughs since we do not have the tube, DLR or frequency of trains of other areas.
- Comments highlighted a required expansion of the tube network, a DLR extension, tram extension to Bromley South and further to facilitate east-west commuting and to Biggin Hill.
- Need for further pedestrianisation in the retail areas of the Borough, combined with improved bus (and tram) services and better provision for cyclists.
- There were concerns that public transport needs to be seen as a cheaper and more comfortable option than the private car. Encouraging cycling in the Borough.
- Comments suggested the introduction of local congestion charging to encourage and subsidise the take-up of public transport. ‘Inappropriate’ car use could be reduced by progressive road pricing and increasing restrictive parking to stop short journey commuter parkers.
- Double yellow lining a mile around each school to encourage walking to school and to reduce the twice daily school traffic congestion.
- Having an 'express' bus services during peak times to major areas of employment and transport hubs could be introduced. For example the 119 is the main form of public transport from Bromley to Croydon - it takes 1 hr in the morning. However half the route from Shirley onwards is served by many other bus routes, therefore why not make it fast from Shirley to East Croydon to link up with the tram, and train stations. A similar approach could be used for services from Biggin Hill to Bromley, between Bromley and Beckenham Junction, Bromley Common to Orpington etc. Not all buses on that route during the rush hours - but every other bus.
- Ensuring the very long bus routes to big areas of employment/transport hubs have express services during peak periods would make a noticeable improvement for commuters, shoppers and other road users. The very local bus routes e.g. R buses in Orpington, and hoppers in other parts of the Borough such as the 162, 226, and 367 that go on the minor roads and smaller towns and villages are vital for connectivity.
- Enhancements needed to the bus terminus at Crystal Palace Parade, together with the suburban and overground station at Crystal Palace, including public conveniences and step-free access to the station. It was also raised that the potential for a tram service to link the Crystal Palace bus terminus and train station should be identified as a longer-term objective.

- Concerns were raised because of the London Plan Strategic Outer London Development designation that Biggin Hill is primarily a residential area surrounded by open country and that any attempt to develop industry and business to the extent that the present character of the village is altered (increased traffic etc) should be resisted at all cost.

Bromley's Valued Environments – Working Draft

Introduction

Bromley has a varied environment as far as both the natural and man made elements are concerned. By far the greater proportion of the borough comprises open space of some description, varying from small formal and informal urban open spaces and parks of great importance to local communities, especially those living in the more densely developed areas, to natural countryside and farmland. There is a similar variation in the built environment, which ranges from fairly high density Victorian and Edwardian residential areas to more spacious sub-urban developments established in the inter and post war periods and the remnants of the former large country estates exemplified by Sundridge Park and Holwood House.

It is important that the best features of these environments is conserved, whilst being carefully integrated within new developments to meet the needs of 21st Century living.

In the previous consultation on the Core Strategy Issues Document (CSID) very few of the comments received related to the 'Built Heritage' assets, the bulk were concerned with open space. A significant number of the comments received on the latter were very site specific, some involving the release of Green Belt for housing, others dealing with very local issues which could not be taken into account by either policies or site designations, although properly framed policies would aid in their possible resolution over the years covered by the Plans.

As far as 'Valued Environments' are concerned, the key issues for the next 20 years are likely to relate to the pressure on land for development, in particular housing and are summarised as follows:

- Applications for demolition and redevelopment of Locally Listed Buildings
- Requests for additional ASRCs and Conservation Areas, limiting the scope for redevelopment adding to the pressure to develop open space
- Release of Green Belt land and private open space sites in the built up area
- Farm diversification (legal and illegal)/sub division
- Food security
- Relating the provision and maintenance of open space to the changing needs of the local population

National Planning Policy Framework (NPPF) and the London Plan

Open and Natural Space

On the Green Belt, the NPPF maintains its fundamental aim to prevent urban sprawl by keeping land permanently open ensuring that the essential characteristics of openness and their permanence are ensured.

The NPPF requires Local Authorities to set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Policies should set out criteria against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

Built heritage

The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, in developing this, they should take into account The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place. In considering this care must be taken with particular regard to the designation of both new Conservation Areas and Areas of Special Residential Character in order not to devalue the policies or put undue pressure for development on other parts of the borough.

In the case of both 'Open and Natural Space' (including Green Belt) and 'Built Heritage', the detailed policies in the recently adopted London Plan, whilst developed prior to the publication of the NPPF, have been found to be in conformity with the latter.

Visions, Objectives and Strategic Policy Options

Open and Natural Space

Vision:

The value of natural spaces, whether private gardens, rivers and lakes or Green Belt, is recognised and afforded a high priority. Land, air and water environments are sustainably managed, ensuring that the wide range of different open spaces and habitats, with their distinctive animal and plant life, are well managed and accessible. As well as helping conserve and enhance biodiversity, Bromley's natural environment supports the wellbeing of its communities, with open spaces and trees providing healthy environments and

space for leisure and sport. Opportunities are taken to increase natural habitats, especially in areas with a deficiency, linking them together and improving their quality and accessibility.

Objectives:

- Manage, protect and enhance natural environments
- Encourage the protection and enhancement of biodiversity.
- Ensure that the Green Belt continues to fulfil its functions
- Improve the quality of open space and encourage provision in areas of deficiency and in any new development.

Strategic Policy Options:

Option 1a Review and define all open space designations - **PREFERRED**

This has been undertaken and leaves open the opportunity for representations to be made on these and other additional sites to be considered.

Option 1b Once defined, in view of the importance of the designations, maintain and protect the open space - **PREFERRED**

Option 2 Ensure that the GLA 'All London Green Grid Supplementary Planning Guidance' is incorporated in the Planning Policies to assist in the creation of new public spaces, the enhancement of existing open spaces and improvements to the links in between - **PREFERRED**

The All London Green Grid is a multifunctional of open spaces which will secure benefits including, but not limited to: biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being. The open spaces in Bromley will provide part of a strategic network of green infrastructure for London.

Option 3 Develop policies to improve use of and access to open spaces - **PREFERRED**

This would very much be driven by strategies developed within other departments dealing with the development and operation of our open spaces in conjunction with the Strategy and Renewal Division, through this Local Plan.

Option 4 Work with neighbouring boroughs to meet the London Plan policy objectives for open space - **PREFERRED**

This will ensure that the Open Space policies developed for Bromley, whilst reflecting the local circumstances, are in line with the London Plan and the policies adopted by adjoining other authorities. This will be particularly important in cases where the open spaces either side of authority boundaries are virtually contiguous. In the case of Bromley the most important instance will be the Green Chain. The importance of Green Chains is highlighted in the London Plan; consequently the fact that we no longer subscribe to the Green Chain Project fund does not negate the need to co-operate with adjoining boroughs in supporting and strengthening the South East London Green Chain.

Option 5 Ensure that full consideration is given to the incorporation of green space in all Area Action Plans or Neighbourhood Plans by way of site allocations - **PREFERRED**

This would aid in the provision of new spaces to serve essentially local communities when major schemes are developed and reflect what local residents see as their priorities in this type of provision.

Option 6 Involve 'Park Friends' in the development of open space policies – **PREFERRED**

This would give such groups, with very local knowledge of the users of the open spaces, the formal opportunity to have an input to the broader policies which could affect the parks and open spaces in which they have a particular interest.

Built heritage

Vision:

Our man-made heritage assets; areas of distinctive character, listed buildings, conservation areas and monuments, are protected and enhanced. No historic features are considered to be "at risk". The borough's rich heritage is widely enjoyed.

Objectives:

- Continue to protect locally and nationally significant heritage assets.
- Ensure development complements and improves the setting of heritage assets.
- Encourage greater accessibility of heritage assets.
- Encourage a proactive approach to the improvement of heritage assets

Strategic Policy Options:

Option 1 Develop policies for appropriate areas and buildings of importance to the historic environment to ensure protection and enhancement of distinctive parts of the Borough. - **PREFERRED**

In most respects these have been defined already (Historic Monuments and Parks, Conservation Areas, Nationally and Locally Listed Buildings).

Option 2a Maintain the existing criteria for Areas of Special Residential Character and add areas where existing criteria are met. - **PREFERRED**

Option 2b Review and update the criteria for Areas of Special Residential Character.

Last year, a representation was made by the Chelsfield Park Residents' Association during the consultation on the Core Strategy Issues Document asking that this area be considered for such a designation. There may be other representations regarding additional areas. It is important that the criteria are retained to ensure that areas so defined, are of sufficient quality to merit it to avoid the devaluation of the concept and limiting opportunities for development. With the intention to protect open spaces, increasing protection for substantial residential areas from change would place excessive pressure on the remaining, in many cases already intensively developed parts of the borough.

Option 3 Work closely with the Bromley Museum, the Museum of London Archaeology Service and English Heritage to ensure the protection of the Areas of Archaeological Importance. - **PREFERRED**

These areas will, as now be defined on a map, with the guidance and advice of the aforementioned bodies that would also be approached for their advice and expertise in this field when any proposals of significance are put forward.

Development Management Policies

“Bromley’s Valued Environments” strategic options will be supported by development management policies likely to include the following:

- Replacement of and extensions, conversions or alterations to, houses in the Green Belt or Metropolitan Open and (MOL)
- A development on land abutting either the Green Belt MOL
- Currently there are policies in the UDP which expand on Government Guidance giving more detail of how the guidance will be applied in the local Bromley environment, namely (in outline):
 - the types of development related to farm diversification schemes which will be acceptable;

- the criteria required to be met in relation to agricultural workers' dwellings;
 - the circumstances under which development will be considered acceptable on Green Belt, MOL and Urban Open Space;
 - the circumstances under which total or substantial demolition of a listed building will be considered acceptable;
 - the circumstances under which locally listed buildings can be replaced, altered, extended or the use changed;
 - the criteria to be applied to new developments in Conservation areas and where demolition is required
- Additional policies in response to Strategic Options

Introduction and Background

Bromley's economy is one of the largest in outer London, with just over 13,000 businesses and an estimated 129,000 jobs - an economic scale similar to cities such as Reading and Stoke-on-Trent. The Borough has consistently had high levels of employment and a highly skilled workforce. Approximately two thirds of the jobs in the Borough are taken by local residents of Bromley and 55% of the local working population travel out of the Borough to work, the majority in central London.

Employment in the borough is forecast to increase by 6% to 137,000 by 2031, from 129,000 in 2011; this increase is similar to the percentage change in many other outer London boroughs including the adjoining Boroughs of Croydon and Bexley.

A strong local economy is key to continuing prosperity in Bromley, underpinning the high quality of life which characterises the Borough. Business owners and managers appreciate the Borough's excellent transport links, its readily available pool of skilled staff, low crime levels and green surroundings.

Policy Options**Vision**

Bromley is a prosperous, thriving and skilled borough where businesses choose to locate. New businesses start up and grow using local skills, supply chains and investment and Business Areas offer high quality flexible accommodation. There is an improved range of employment opportunities for residents and education and skills levels have been raised throughout the borough.

Objectives

- Business Areas adapt successfully to the changing needs of modern industry and commerce.
- Ensure there is an appropriate supply of commercial land and a range of flexible quality business premises in the borough.
- Ensure businesses contribute to a high quality, sustainable environment, through their premises development and locational decisions.
- Support the appropriate provision of facilities to deliver high quality education and training.

National and London Plan Policies**The National Planning Policy Framework (NPPF)**

Significant weight is to be placed on the need to support economic growth through the planning system. The Government is committed to securing economic growth in order to create jobs and prosperity through sustainable economic growth.

Employment land is to be protected where there is evidence that it is needed, however, the NPPF states that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.

Office development will continue to be assessed as a town centre use and therefore subject to the sequential approach, resisting out-of-town development.

The NPPF recognises that it is important that needs of retail, leisure and office and other main town centre uses are met in full and are not compromised by limited site availability. The NPPF makes clear that local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites and allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centres sites are not available.

Local plans should define the extent of town centres and their primary shopping areas and set policies to define which uses will be permitted in such locations.

London Plan

The London Plan sets out the Mayoral vision and strategic policy regarding the economy and business growth, which the Local Plan has to conform to. The key relevant policies are highlighted below:

Policy 2.6 Outer London: Vision and strategy

The Mayor will, and boroughs and other stakeholders should, work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches through LDFs and other development frameworks to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements.

Policy 2.7 Outer London: Economy

The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends.

Policy 2.16 Strategic Outer London Development Centres

The Mayor will, and boroughs and other stakeholders should, identify, develop and promote strategic development centres in outer London or adjacent parts of inner London with one or more strategic economic functions of greater than subregional importance by:

- a) co-ordinating public and private infrastructure investment
- b) bringing forward adequate development capacity
- c) placing a strong emphasis on creating a distinct and attractive business offer and public realm through design and mixed use development as well as any more specialist forms of accommodation
- d) improving Londoners' access to new employment opportunities.

The Mayor will work with boroughs and other partners to develop and implement planning frameworks and/or other appropriate spatial planning and investment tools that can effect positive change to realise the potential of Strategic Outer London Development Centres.

Strategic Industrial Locations and other Industrial Provision

London Plan Policies 2.17 and 4.4 set out a plan-led approach to promoting and managing industrial capacity through three types of location:

- Strategic Industrial Locations (SILs) – a resource that must be sustained as London’s main reservoir of industrial capacity but nevertheless must itself be subject to periodic review to reconcile demand and supply.
- Locally Significant Industrial Sites (LSIS) – protection of which needs to be justified in assessments of supply and demand for industrial land; and
- Other smaller industrial sites that historically have been particularly susceptible to change. In some circumstances these sites can better meet the London Plan’s objectives in new uses, but in others will have a continuing local and strategic role for industry. This sub-category is likely to continue to be the area of greatest change.

To meet the needs of different types of industries, the London Plan identifies two broad categories of SIL:

Preferred Industrial Locations (PILs) are suitable for firms that have less demanding environmental requirements and typically fall within the light industrial, general industrial and storage and distribution Use Classes (B1(c), B2 and B8 respectively).

Industrial Business Parks (IBPs) are for firms that need better quality surroundings and typically include activities such as research and development (B1b), light industrial (B1c) and high value-added general industrial (B2). Generally they require significantly less heavy goods access and are able to relate more harmoniously with neighbouring uses than those in PILs.

Strategic Industrial Locations in Bromley

- St Marys Cray (IBP) (which accounts for 41% of all designated business area floorspace in the Borough).
- Foots Cray Business Area (IBP) (which borders Bexley).

Policy 4.4 Managing Industrial Land and Premises

The Mayor will work with boroughs and other partners to:

a) adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and

related uses in different parts of London, including for good quality and affordable space

b) plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

Bromley is ranked as '**restricted**' for the transfer of industrial land to other uses.

Restricted Transfer: Boroughs in this category typically have low levels of industrial land relative to demand (particularly for waste management or land for logistics) and/or low proportions of industrial land within the SIL framework. Boroughs in this category are encouraged to adopt a more restrictive approach to transfer.

LB Bromley Core Strategy Issues Document (2011)

Appendix 1 to this paper summarises the consultation responses in relation to the above document (previously reported to the LDFAP and DC Committee – see report 17/11/2011 Item 9).

Strategic Policy Options

Business, Employment and the Local Economy

Employment in the borough is forecast to increase by 6% to 137,000 by 2031, from 129,000 in 2011; this increase is similar to the percentage change in many other outer London boroughs including the adjoining Boroughs of Croydon and Bexley.

Research has shown these trends are likely to lead to the following net additional figures for space required to accommodate changes in employment:

- A significant requirement for office space (121,000 sq m) driven by business services and financial services
- Falling requirements (-9,200 sq m) for industrial /other business space driven by a decline in the manufacturing sector, and a decline for warehousing (-7,700 sq m)
- A small increase in non-B uses requiring traditional employment (i.e. B use) sites of 2,300 sq m, driven by declines in wholesale and increases in health and education.
- Also, a brief examination of non-B uses requiring non-traditional (i.e. non-B) sites highlights a total requirement of 249,000 sq m of floorspace. This will be driven primarily by construction, retail, hotels and restaurants. This requirement is likely to need a variety of types and locations of sites across the borough that fall under a number of non-B use classes.

Options:

(1) Strategic Industrial Locations (SIL)

Option 1A - PREFERRED

Carry forward the London Plan (SIL) designations for St Marys Cray (Industrial Business Park (IBP)) and Foots Cray Business Area (IBP) into the Local Plan and continue to protect them for employment uses and encourage upgrading through development and refurbishment.

(2) Business Areas Designations

Option 2A - PREFERRED

Continue to protect the Business Area designations as Locally Significant Industrial Sites (LSIS), so they can continue to meet business and employment needs and benefit from protection from changes of use and facilitate their upgrading through development and refurbishment:

Airport Trading Estate, Biggin Hill
Crayfields Business Park, St. Paul's Cray
Elmers End, Croydon Road
Farwig Lane, Bromley
Homesdale Road, Bromley
Lower Sydenham
Oakfield Road, Penge

Ruxley Corner/Foots Cray, Bromley/Bexley border
Sevenoaks Way/Cray Avenue, St. Mary Cray

Option 2B

Consolidate the Business Areas to provide more flexibility for mixed use development in particular areas to ensure the retention of employment land. This is not a preferred option given the Borough's 'restricted' status.

(3) Development Outside Business Areas

Option 3A

Maintain the policy approach as per UDP policy EMP5:

"The redevelopment of business sites or premises outside of the Designated Business Areas will be permitted provided that:

- (i) the size, configuration, access arrangements or other characteristics make it unsuitable for uses Classes B1, B2 or B8 use, and
- (ii) full and proper marketing of the site confirms the unsuitability and financial non-viability of the site or premises for those uses. "

Option 3B - PREFERRED

Introduce a criteria based policy (consistent with the London Plan and Mayoral Supplementary Planning Guidance) to protect non-designated employment sites from change of use, similar to UDP policy EMP5. This would assess whether such sites are suitable for continued business use or whether this would cause amenity, access, parking or other issues in the area.

Criteria would be based general economic and land use factors and indicators of industrial demand. In developing criteria-based policies, guidance states that boroughs should seek to retain those sites in industrial use that are functionally the most important for industrial and related users. These will generally include the better quality industrial sites, but may also include poorer quality sites that provide scope for low cost industrial accommodation for which there is demand.

Option 3C

Where proposals come forward, consider mixed use or other employment uses that retain an employment function. This is not a preferred option given the Borough's 'restricted' status.

(4) Future Requirements for Office Floorspace

As noted above, there is a significant future requirement for office space, which raises questions as to how the Council is to accommodate this growth. Local research notes that the key to planning employment land provision to 2031 is restricting the release of existing office sites and non-office sites that have the potential to be converted to office uses.

Option 4A - PREFERRED

Protect all existing office floorspace in accessible (based on PTAL rating) locations.

Option 4B

Restrict new office developments to accessible (based on PTAL rating) town centre locations.

Option 4C

Allow office developments on employment land where PTAL rating and accessibility is deemed sufficient.

Option 4D - PREFERRED

Direct proposals for any large new office developments to town centres as part of the renewal of office stock.

(5) Biggin Hill - Strategic Outer London Development Centre (SOLDC)

The London Plan designates Biggin Hill as a Strategic Outer London Development Centre (SOLDC) – a development centre with one or more strategic economic functions of greater than sub-regional importance. This designation raises issues as to how the Council plans for the employment and business opportunities for Biggin Hill as a SOLDC, whilst protecting the environment and quality of life.

Option 5A - PREFERRED

The Council will work with the Airport and businesses in the area to enhance the areas employment and business opportunities, subject to the impacts of development taking regard to the accessibility and environmental constraints of Biggin Hill. This would accommodate growth on the existing sites through the intensification and reuse of vacant buildings to meet the objectives of the SOLDC.

Option 5B

In order to realise the full SOLDC potential and accommodate a feasible higher level of growth, consider restructuring the green belt designations to allow controlled growth on specific strategic areas that best serve the Airport.

Option 5C - PREFERRED

Encourage a mixed use approach (excluding residential) to West Camp to incorporate the planned heritage centre, whilst acknowledging and addressing the sustainability issues around the heritage constraints on the buildings.

Option 5D - PREFERRED

Continue to restrict the West Camp area to aviation-related uses.

Option 5E

Continue to restrict the East Camp area to aviation-related uses.

Development Management Policies

'Working in Bromley' strategic options will be likely to be supported by development management policies including the following:

Offices:

- Proposals for large new office development are to be located on defined proposals sites or within Bromley, Orpington, Penge and Beckenham town centres.
- Large new office developments will be permitted only on sites that are highly accessible by public transport.
- Proposals for office development will be expected to ensure that shopping functions of the town centres are not impaired and on small office schemes, mixed use or flexible space for small businesses and start-ups can be achieved.
- Policy will utilise criteria restricting the conversion or redevelopment of offices for other uses, such as demonstrating vacancy and loss of employment.

Development outside Business Areas:

- Outside designated Business Areas the Council will only permit non-conforming business uses where there would be no significant adverse impact on the amenity of the surrounding properties.
- When considering proposals to refurbish or extend business activities, or those involving a change of use, the Council will encourage the inclusion of environmental improvements.

Small Businesses:

- The Council will encourage proposals, which improve the supply of small business units, managed workspaces and live/work units. Small business and managed workspaces should be located in town centres, local parades, Business Areas or land and premises used for employment purposes.
- In cases where planning permission is required, the Council will normally permit the use, by the householder, of part of a dwelling for business purposes subject to specific criteria.
- Schemes that provide facilities for small businesses will be permitted in local centres, provided that the vitality and viability of that centre is not impaired
- Additional policies in response to the Strategic Options.

London Plan (2011)

Policy will reflect the Borough's obligations under the London Plan:

Policy 2.17 Strategic Industrial Locations

- Protect SILs, restricting development proposals to protect their function and enhance their attractiveness.
- Identify SILs on a map.

Policy 4.3 Mixed Use Development and Offices

- Mixed use development and redevelopment should support consolidation and enhancements to the quality of the remaining office stock.

Policy 4.4 Managing Industrial Land and Premises

- Protection and management of industrial land.

Policy 4.12 Improving Opportunities for all

- Strategic development proposals should support local employment, skills development and training opportunities

Town Centres – Working Draft

Introduction

Bromley Town Centre is a competitive Metropolitan Town Centre which currently ranks 34th out of 50 in the 2011 CACI Retail Footprint Index bringing in an expenditure of £650 million. The Borough ranks slightly behind Croydon 32nd place and Bluewater 11th which are Bromley's two biggest competitors.

Major renewal of Bromley Town Centre is planned over the next 15 years, supported by £2 million Mayoral funding. This will increase the town's position in the retail rankings and provide an attractive environment for new businesses to locate. The historic core of Bromley North Village has also been identified through the *Mayor's Great Spaces* as a public realm investment priority area.

The Area Action Plan for Bromley (Adopted 2010) sets out that significant investment is planned across 12 Opportunity Sites in Bromley. The AAP sets out 42,000sqm (gross) of additional retail floorspace can be provided through the promotion of new retail development on Opportunity Sites E and G.

One of these sites, Opportunity Area A (OSA) was the subject of a successful challenge in the High Court. The result of the challenge is that the High Court directed the Council to prepare, publish and consult upon and promote an Area Action Plan (AAP) for OSA.

Policy Options

Vision

Town centres provide a range of goods and services and are safe, clean and welcoming for all. Bromley Town Centre is a competitive *Metropolitan* Town Centre, complementing others in the region and attracting a wide range of visitors to its shopping, cinema, theatre and restaurant areas. Orpington functions as a strong and vibrant *Major* centre, offering a good range of shopping, leisure and public amenities. These centres, together with the *District*, local and neighbourhood centres, provide accessible shops, services and facilities for residents and wider communities across the borough.

Objectives

Ensure vitality of Bromley Town Centre, delivering the aims of the Area Action Plan

Encourage a diverse offer in the town centre, including shops and markets, services, leisure and cultural facilities as well as homes.

Support the continued improvement of Orpington and other district and local centres

Encourage safe town centres and a prosperous evening economy.

Maintain and improve neighbourhood centres and parades across the borough to ensure locally accessible facilities.

National and London Plan Policies

The National Planning Policy Framework (NPPF)

The NPPF requires Local Authorities to use their evidence base to ensure that their planning policies are positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local plan, local planning authorities should:

- § Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- § Define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- § Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.
- § Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- § Retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- § Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.
- § Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre
- § Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- § Recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- § Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

London Plan

The London Plan sets out the Mayoral vision and strategic policy regarding the economy and business growth, which the Local Plan has to conform to. The key relevant policies are highlighted below:

Policy 2.15

Town Centres

- a) in light of local and strategic capacity requirements, identify town centre boundaries, primary and secondary shopping areas in the LDF
- b) in co-ordination with neighbouring authorities, identify other, smaller centres to provide convenient access, especially by foot
- c) manage declining centres proactively
- d) support and encourage town centre management

Policy 4.7
Retail & Town Centre Development

- a) identify future levels of retail and other commercial floorspace need in light of integrated strategic and local assessments
- b) undertake regular town centre health checks to inform strategic and local policy implementation
- c) take a proactive partnership approach to identify capacity and bring forward development
- d) firmly resist inappropriate out of centre development
- e) manage existing out of centre retail and leisure development in line with the sequential approach.

Policy 4.8
Supporting a Successful & Diverse Retail Sector

- a) bring forward capacity for additional comparison goods retailing in Metropolitan and Major Centres
- b) support convenience retail particularly in District, Neighbourhood and Local Centres
- c) provide a framework for maintaining, managing and enhancing and neighbourhood shopping and facilities which provide local goods and services
- d) identifying areas underserved in local convenience services provision
- e) supporting a range of London's markets
- f) support the development of e-retailing

Policy 4.9
Small Shops

- b) LPA's should develop local policies where appropriate to support the provision of small shop units

Current Saved UDP Policies:-

The majority of the existing Saved UDP policies are NPPF compliant while others of a particular Development Management nature serving local communities will need further clarity, along with new policies derived by the options offered in this paper.

Retail/Town Centre related strategic options will be supported by Development Management policies likely to include the following:

- § Primary Frontages
- § Secondary Frontages
- § The Glades
- § Local Centres
- § Local Neighbourhood Centres
- § Retail and Leisure Development

- § Retail and Leisure Development
- § Petrol Filling Stations
- § Food and Drink premises
- § Non-Retail Uses in Shopping Areas
- § Residential Accommodation
- § Markets

Bromley Town Centre Area Action Plan Retail Related Policies – Adopted 2010

- § BTC4: New retail facilities

LB Bromley Local Plan Issues Document 2011

- § Appendix 1 to this paper summarises the consultation responses in relation to the Local Plan Issues document consultation.

Options:

1. How to ensure Bromley Town Centre remains competitive

Bromley's function is primarily as a comparison goods shopping destination. The AAP sets out that the total retail floorspace of the town centre is approximately 115,200sqm including The Glades which comprises 40,700sqm and The Mall 10,780sqm. The development of Opportunity Sites E, G and K are seen as key sites to improve the offer of existing retail stock in Bromley Town Centre.

The latest Retail Capacity Study (2012) concluded that Bromley could accommodate capacity for a further 10,700 sqm net of comparison floorspace at 2016; rising to about 23,100 sqm by 2021 and 37,700sqm by 2026 if forecast trends occur.

Option 1A.1 - **PREFERRED** - To revisit the contribution Opportunity Site A (OSA) from the BTC AAP can make to the development of Bromley Town Centre.

2. How can Orpington continue to be improved and be promoted to compete as a Major Town Centre?

The 2007 Orpington Masterplan was used to spear head public realm improvements for Orpington Town Centre which were completed in July 2010. As part of the town centre improvements Orpington library has been successfully relocated into the Walnuts and a planning application is currently with the Council regarding the development of a 9 screen cinema which would further revitalise this part of the town centre.

Option 2A.1 - **PREFERRED** - Encourage new businesses to the area in particular more of a mix of businesses to improve the overall retail offer for shoppers.

Option 2A.2 - **PREFERRED** - Encourage more independent shops to set up along with continental markets as set out in the NPPF and Mary Portas review.

3. Is there additional scope to support leisure, recreation and the evening economy outside Bromley and Orpington Town Centre?

The leisure and evening economy has seen one of the largest growth areas in recent years and provides an opportunity for diversification of the range of activities in town centres.

Option 3A.1 - Cluster restaurants, pubs and hot food takeaways where they will not harm the retail character of the shopping frontages and where they do not impact upon residential amenity in town centres.

Option 3A.2 - **PREFERRED** - Designate areas which contain the largest concentration of restaurants, pubs and hot food takeaways.

Option 3A.3 - **PREFERRED** - Protection of the retail function and broader role of the District Centres.

Option 3A.4 - **PREFERRED** - Explore options of extending the recreational and leisure offer available in District Centres.

4. How to retain an adequate supply of local shops and community services?

Bromley has 73 local neighbourhood parades which ensure a vital mix of services for local people. The majority of parades contain a mix of different Use Classes. The latest local parades review study shows that the majority of parades are performing well.

Option 4A.1 Seek to maintain, promote and enhance all 73 local parades

Option 4A.2 - **PREFERRED** - Allow more flexibility to not restrict non-A1 uses in parades to stop vacant units staying empty

Option 4A.3 Remove local parade designations where all shop units are vacant or with non A1 use class

5. How do we make sure the Borough remains competitive relative to London and the South East?

Bluewater and Croydon are Bromley's biggest competitors with Bluewater's expenditure for 2011 reaching £1,140million, Croydon £670million and Bromley £650 million. Bromley needs to continue to expand its retail and leisure offer to continue to retain its standing in the retail rankings.

Bromley has a retail turnover of £650 million and a broad catchment area to the south east of London, encompassing Sevenoaks and beyond. Major renewal of Bromley town centre is planned over the next 15 years, supported by £2 million Mayoral funding. It is hoped that the boost in expenditure will increase the town's position in the retail rankings and provide an attractive environment for businesses, workers and shoppers.

Option 5A.1 - **PREFERRED** - Focus new development in the Town Centres and only allow out of centre development where it meets the criteria set out in the NPPF.

Option 5A.2 - **PREFERRED** - Consider the physical extent of the borough's linear shopping centres and the role of primary and secondary frontages in supporting their competitiveness and role in the retail economy.

APPENDIX 1

Summary of responses from Issues consultation (see also DC Committee Report 17/11/2011 Item 9)

It was acknowledged that there is a strong need for a carefully structured mix of different sized offices, workshops, studios and industrial units that vary from one person upwards to accommodate the various business sizes and scope for growth. Also noted was the importance of business space for start-up businesses with low-cost, easy-in, easy-out, managed solutions for those out-growing their home based business. Accompanying this is the issue of the provision of a very high speed and managed internet access infrastructure.

It was noted that the Core Strategy must be flexible and responsive to cater for the support and encouragement of sustainable economic growth. Comments pointed to the requirements for an assessment of the existing employment land and premises in the Borough, many of which could be considered unfit for purpose. The issue of flexibility was raised in respect of the terms of land use classes. It was suggested that mixed-use schemes could help ensure varied economic activity and assist in delivering regeneration.

Comments were received that suggested the Council designate an area as a 'Bromley Business Park' and support the provision of infrastructure to facilitate development and secure employment land for the future. Connected to this was the issue that the Council should identify future levels of retail and other commercial floorspace for different areas.

Comments received noted that the Core Strategy should support the widest range of employment uses. The Council should ensure that the development plan identifies a range of sites to facilitate a broad range of economic development. It was pointed out that policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances. Change of use class should be supported within planning policies. It is considered that a definition of uses appropriate on employment land should be included within the Core Strategy, to recognise that sui generis uses may be an appropriate use for employment land.

It was advocated that the Business Areas have changed in the past 10 years and, not only are the UDP permissive uses likely to now be incompatible with neighbouring commercial and residential land uses, but the shift to the office based economy will mean some sites provide limited value to the business community to develop it for its allocated uses.

It was highlighted that the Council needs to designate new and safeguard existing employment land, whilst balancing the supply of land with prospective demand based on robust evidence that also has full regard for markets needs. Designated Business areas will need to be capable of the requirements of high traffic volumes and public transport infrastructures.

The Metropolitan Police were concerned about the provision of patrol bases, custody centres and relevant pan-London policing facilities that are an essential part of effective borough-based policing. The nature of these uses are similar to that carried out on most employment sites and are therefore suited to employment sites and similar locations. Whilst falling outside the 'B' Use Class definition, these policing uses are

employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

The Met police also highlighted the need for front counter facilities and contact points where the public can interact easily with police officers. Local centres and other shopping frontages provide ideal locations for these facilities due to the high levels of public accessibility and footfall. Such policing facilities add to the vitality of local centres by ensuring that an active frontage is maintained as well as providing an increased perception of safety and security across the Borough. Planning Policy should enable suitable community uses, such as front counter policing facilities to be developed within town centres and shopping frontages. The Met police recommend that the following sentence is included:

Where employment densities are similar to existing, designated employment sites may also accommodate alternative employment generating uses - including facilities for emergency services.

The point was made that the Council needs to recognise that the scale and quality of the resident workforce is one of the boroughs greatest assets; and that it is essential to the boroughs future economic prosperity that the resident workforce grows in line with the forecast pace of employment change. Housing development should be acknowledged as a key contributor to maintaining an adequate and flexible resident workforce. The fact that the large share of forecast employment growth is in sectors of the economy that are office-based is advantageous to the sustainable development of the borough.

There was recognition of the significant employment and business opportunities at Biggin Hill. Comments were received on the London Plan designation of Biggin Hill as a Strategic Outer London Development Centre (SOLDC) and that the area is comprised of a cluster of high technology and avionic businesses. Comments highlighted Biggin Hill's economic potential to provide a real drive and boost to the economy of the Borough. The GLA noted the Mayor of London's keenness to encourage economic growth in Outer London, with direct reference to Biggin Hill's designation as a SOLDC to encourage investment in this area.

It was noted that the LoCATE@Biggin Hill initiative provides an opportunity for the potential investment and improvements to Biggin Hill to be realised. Biggin Hill could act as a focal point for further economic growth, but for this to happen it was noted that it was imperative that the SOLDC and LoCATE initiatives be cemented into a positive local planning policy framework, in line with the Governments Plan for Growth agenda.

The mutual benefits of the associated business clusters at Biggin Hill were raised as a key issue, with links to supporting initiatives, such as training, that can help to attract and retain skilled labour. Comments were received about bringing vacant land and buildings back into operational use.

It was suggested that the Council facilitate the creation a business park, however, it was noted that the road network around Biggin Hill severely limits the potential scale of any development. Development of the road/train/tram infrastructure, together with

further carefully planned residential housing needs to be coordinated with the 'Strategic Outer London Development Centre' aspirations.

The issue of noise and disturbance coming from the airport was raised, but the context of the Heathrow flight path over parts of the Borough was acknowledged. It was suggested that a carefully planned easing of the Biggin Hill flight restrictions may make little practical difference to actual noise levels, whilst helping to make the area a centre of avionics excellence.

Observations were made that in order to be successful it is necessary to allow for the other associated facilities to establish and develop in the area. This will include housing, retail, leisure, social facilities, open space, transport and so on. It is important that the area is considered as a whole and not focused solely on the employment element. There was a call for an action area approach to incorporate the wider area around Biggin Hill to maximise the potential for growth in a fully coordinated way. Also raised was the need for a planning framework for Biggin Hill which will enable positive planning to encourage investment and growth.

In terms of Bromley town centre, comments were received about securing an anchor department store, improving night time security and developing a restaurant quarter. This could be supported through the use of park and ride schemes. High quality retail developments alongside the provision of new housing in the town centre were suggested as a means not losing market share to neighbour Croydon. There were comments that Bromley town centre should limit the number of less desirable establishments such as betting and sex shops through the use of planning policies.

Concerns were raised that the Core Strategy will need to set out how the Council will work with landowners to deliver development on the sites identified within the AAP, making provision for the delivery of alternative uses in instances where it can be demonstrated that a preferred use is no longer viable, or marketable to potential occupiers. This approach will ensure an appropriate degree of flexibility that will assist in enabling the overall AAP vision to be achieved during the lifetime of the plan period.

Bromley town centre's importance as a location for high value-added office-based sectors of the economy was raised as being essential to the future prosperity of the Borough. Support for the individual small retailers by adopting strong policy to protect and encourage them was also mentioned.

The importance of public transport, car parking, the breadth of retail offer available, were highlighted in order to support the local shops. In the current climate, it was suggested that the Borough take a lead in capping business rent and rates.

The point was raised that banks are significant generators of footfall and that the Council should recognise the positive impact that financial service retailers such as the banks have upon vitality and viability. Limiting certain uses in the primary shopping frontages undermines the Council's intention to attract private sector investment in the town centre.

The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. In the view of the Bank, the Core Strategy must consider the issue of the Council's outmoded approach to A2 uses in town centres. Critical of the lack of a review of the Council's out-of-date policies for primary shopping frontages and the lack

of any evidence to continue with them. It was suggested UDP policies such as S1, S2 and S3 are reviewed as they are neither consistent with National Policy nor justified.

It was suggested the Priory in Orpington should be brought into use including the old library for a cultural centre adjacent to the park. Developers should be encouraged to develop schemes in Vincent Close, Homefield Rise and Lancing Road together with redevelopments on the south side of the War Memorial roundabout.

The approach of ensuring the continued vitality of Bromley Town Centre, particularly through the implementation of the AAP is supported by an Opportunity Site landowner who suggests that it should be made clear in the Core Strategy that the council will work pro-actively with landowners to enable delivery.

Retail should be diverse and include a mix of local and chain offerings i.e. not just fashion and clothing shops from the usual brands.

Include commitment to build and retain markets like the Thursday market in Bromley Town or the Friday and Saturday offerings in the High Street

The Council needs to look closer at areas for regeneration, e.g. shop closures in Petts Wood

Town Centres should be safe and welcoming all day or night. The behaviour of youths during the evenings and weekend will deter people from visiting the town centre.

All existing retail sites should seek to fulfil their potential, including through expansion or redevelopment.

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Environmental challenges – working draft

Introduction

The Government and the GLA have highlighted the need to for Local Authorities to tackle the challenges of reducing carbon emissions and designing places that allow comfortable and healthy living into the future. From reducing the carbon emissions from buildings to helping ensure wildlife can move between habitats, planning policies can ensure development makes a full contribution to these important issues.

The Government's overarching guide on planning policy – the National Planning Policy Framework (NPPF) – emphasises the importance of planning for changing environments stating that Local Planning Authorities should:

- adopt proactive strategies to mitigate and adapt to a changing climate
- actively support energy efficiency improvements to existing buildings,
- maximise renewable energy and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily
- consider identifying suitable sites for renewable and low carbon energy sources
- support community led initiatives for renewable and low carbon energy
- take full account of flood risk and water supply and demand issues, changes to biodiversity and landscape.

The London Plan 2011 states that all development should make the fullest contribution to the reduction of carbon emissions and Local Planning Authorities should include detailed policies and proposals in their LDFs/ Local Plans.

Reducing carbon emissions

Vision

In 2030, Bromley's new development not only reflects and enhances local character, but also helps reduce carbon emissions and other environmental impacts. The energy efficiency of existing buildings is being improved through high quality refurbishment and low carbon and renewable energy sources are in widespread use.

Policy objectives

The London Plan (2011) sets high expectations for larger developments to contribute to carbon reduction. While all development must adhere to the energy efficiency standards of the building regulations, the London Plan states that in the Capital,

As well as the overall reduction, developments should look at the feasibility of incorporating renewable energy into the scheme, with an expectation that this would account for 20% of the carbon reduction. There are some occasions where both heat and power can be supplied from a low or zero carbon source on site, or from an existing network nearby. The London Plan expects developers to assess whether this kind of decentralised energy network might be appropriate to their proposal.

Boroughs should develop more detailed policies and proposals to support the development of renewable energy and in particular, to identify broad areas where specific renewable technologies are appropriate.

The Area Action Plan for Bromley Town centre already incorporates policies which were based on the London Plan 2008. It is likely that, due to the potential scale of development, there are more opportunities for carbon reduction, local energy networking and the production of renewable energy on some of the sites in the town centre.

Strategic Options

The broad objective is to ensure that new development reduces potential carbon dioxide emissions through its design, materials and use of low carbon energy sources.

1. What level of carbon reduction do we expect development to achieve?

Currently, Bromley uses the policies in the London Plan which require residential developments of 10 units or more and other developments of 1000sqm or more to reduce their carbon emissions by 25% more than the Building Regulations. This reduction increases over time, until developments are considered “zero carbon” – by 2016 for homes and 2019 for other developments. Whilst keeping in general conformity with the London Plan, it would be possible for the Borough to develop more detailed or localised policy on carbon reduction in new development. A technical study would need to show what is likely to be feasible and financially viable in a range of development scenarios to provide evidence for such a localised policy (and policy areas 2 and below).

Option 1A – PREFERRED - Major developments should achieve the minimum standards set out in the London Plan

or

Option 1B – Local standards should be developed which respond to Bromley’s particular local circumstances

2. To what type and size of development should this carbon reduction apply?

In some cases, major developments are able to achieve the minimum target whilst in other cases it is not practically feasible. The policy takes account of feasibility and viability issues and these must be tackled on an individual basis. It is likely that additional (i.e. greater than the building regulations) carbon reductions are possible in some non-major developments and again, this could be determined on a case-by-case basis. Where it is not practically possible to make reductions on-site, the London Plan suggests that a local policy may require an in-lieu payment. This would necessitate the development of project(s) to which the payment could be made, possibly through a local CIL scheme.

Option 2A – All new development should be screened for the feasibility and viability of additional carbon reductions above the level set in Building Regulations

or

Option 2B – PREFERRED - Major developments (10 units residential, 1000sqm non-residential or mixed use) should aim to achieve a minimum additional carbon reduction in line with the London Plan policy.

Option 2C – Where additional carbon reduction is not possible on site, an in-lieu payment should be made towards carbon reduction off site.

3. How should the development of local energy networks (decentralised energy schemes) be encouraged?

Local energy networks can be a very efficient way of generating and electricity and heat. Normally, large power stations lose the heat produced from the production of power but on a smaller scale this can be redirected through a network. Although the Borough does not have

the extensive local energy networks as in the denser parts of London, there are some existing small schemes and these periodically require refurbishment, upgrading or may be subject to redevelopment. Where development occurs and the proposed uses, or those nearby, indicate that a local energy network may be feasible, a new network could be established to provide more efficient and lower carbon energy and heat for that development and its neighbours. Where other smaller scale development occurs, it may be possible for it to connect to an existing network. The London Plan requires boroughs to help identify and establish decentralised energy network opportunities. Work has already taken place in the form of a “heat map” of the Borough which will help guide future development.

Option 3A – PREFERRED - All new development should investigate whether it can connect to an existing, local energy network.

Option 3B – PREFERRED - All major development should investigate the feasibility of establishing a new energy network or connect to and expand an existing network.

4. How can renewable energy be incorporated into new development?

Use of renewable energy provides a significant opportunity to reduce carbon emissions and increase energy security. It can give householders and businesses the opportunity to reduce energy bills and can provide local employment opportunities. It is usually most effective and financially viable to design the production of renewable energy into a development from the outset so it is an important inclusion in a planning application. The London Plan sets a presumption that all major developments seek to reduce carbon emissions by 20% by including on-site renewable energy generation wherever feasible. Bromley has been applying the Mayor’s policy on renewable energy successfully on major developments across the Borough. A range of solutions have been adopted including both electricity and hot water producing panels, biomass powered boilers and heat pumps in the ground or air. When considered from the outset of a development proposal, these technologies have been successfully incorporated into the overall design without any additional impacts on the visual amenity.

Option 4A – PREFERRED - All major developments should include renewable energy generation on-site to account for a minimum of 20% of the total carbon reduction.

Option 4B – Where major developments cannot practically include renewable energy on-site, a contribution should be made towards an agreed scheme of production off-site.

Development Management policies

The determination of planning applications for development will require a set of policies relating to the Borough’s expectations for carbon reduction and design of buildings. Considering the strategic options, it is likely that these policies would include the following:

- Submission of information about sustainable design and construction with a planning application (investigation of the use of the Code for Sustainable Homes)
- Submission of an energy assessment and strategy with a planning application
- Use of green roofs and walls
- Consideration of decentralised energy networks for electricity, heating and cooling
- Requirements for renewable energy
- Off-site contributions where requirements cannot be met on site
- Retrofitting of existing buildings to reduce carbon emissions where opportunities arise
- Stand-alone large scale renewable installations
- Recycling of materials
- Control of the use of external cladding for increasing energy efficiency

Adapting to a changing environment

Vision

New developments incorporate a range of measures to improve their environmental performance and ensure the long term comfort of their users.

More trees, green spaces and living roofs and walls help keep our local environment pleasant and comfortable and create new habitats, increasing biodiversity and allowing the movement of plants and animals between larger areas of natural environment.

Conservation measures in new and refurbished businesses and homes are helping reduce the demand for water.

Fewer buildings and people are affected by flooding. More rainwater is temporarily stored or reused and new development incorporates more effective drainage systems which helps relieve existing flood risk.

Policy objectives

A key role of planning is to ensure that new development and refurbishments are designed to be adaptable to environmental changes and provide a stable and healthy environment for occupants. Whilst doing this, it should also be able to offer improvements to the existing natural environment by restoring and enhancing habitats around it and allowing wildlife to move between habitats successfully. The London Plan encourages developments to make the fullest contribution to a sustainable future through their design, including measures to reduce overheating, including green infrastructure (trees, growing roofs and walls and other soft landscaping), and minimising water use.

Reducing flood risk, now and in the future, is another key issue supported by policies in both the NPPF and the London Plan. The Borough's Strategic Flood Risk Assessment (SFRA) and Preliminary Flood Risk Assessment (PFRA) identify areas most at risk from flooding in the Borough but it is important that proposed new development considers and reduces its impact on surface water through site specific Flood Risk Assessments. Where flooding is considered likely to occur it may be mitigated through the use of Sustainable Urban Drainage Systems (SUDS).

Strategic Options

5. Flood Risk Assessments

The requirement for site specific Flood Risk Assessments is set out in the NPPF and its Technical guide. They should be submitted with proposals larger than 1 ha in Flood Zone 1 (the zone least likely to flood), all proposals in Flood Zones 2 and 3, and also for those areas identified by the Environment Agency as Critical Drainage Areas. Flood risk may also occur in other situations but Risk Assessments are not mandatory in other locations.

Option 5A – PREFERRED - Flood Risk Assessments should be required in areas identified in the NPPF

and

Option 5B – PREFERRED - Critical Drainage Areas should be expanded to include locations with locally identified flood risk issues.

6. Sustainable Urban Drainage Systems

Planning policy must ensure that new inappropriate new developments are prevented in flood risk areas and that any proposed development is directed away from areas that are at higher risk. Where development is not inappropriate (i.e. it should not be in this location because of flood risk) a Flood Risk Assessment will show to what extent it may increase the risk of flooding. Solutions can then be found through the use of Sustainable Urban Drainage Systems (SUDS). These are site specific schemes to delay and reduce the amount of water leaving a site, involving “hard” engineering and/ or soft landscaping, with the ideal outcome of reducing run-off to the rate it would happen from an undeveloped greenfield location. The London Plan states that developments should use SUDS unless there are practical reasons for not doing so, and presents a “drainage hierarchy “ of the basic techniques that should be used from rainwater storage for later use (the most desirable) down to rainwater going straight into the sewer (the least desirable). Currently, technical advice on SUDS is available from the Environment Agency and the construction industry but the wide range of scenarios and solutions and can mean that in some cases the results are not well tailored to the site and are ineffective.

Option 6A – PREFERRED - Require SUDS to follow the London Plan drainage hierarchy and Environment Agency guidance

and

Option 6B – Require SUDS that accord with locally established criteria to improve their effectiveness.

Development Management Policies

- Reducing over-heating and the need for powered cooling
- Inclusion of soft landscaping, green roofs and walls in and around developments
- Use of shelters and shading in the public realm
- Conservation of habitats, biodiversity and wildlife corridors
- Development of new habitats
- Use of water saving measures in new development to meet maximum standards
- Requirement for Flood Risk Assessments
- Use of Sustainable Urban Drainage Schemes (SUDS)
- Use of local CIL to contribute to larger flood risk and surface water management schemes

Waste management

Vision

Less waste is produced in the Borough and more of the waste that used to end up in landfill is reused and recycled. New cleaner technologies are used to turn more of the remainder into a source of energy and/or heat.

Policy objectives

The continuing challenge to deal with the waste we produce can be tackled in a number of ways. Schemes to encourage people to reduce what they throw away and increase reuse and recycling can make a major contribution but space is still needed to deal with managing the remaining waste and disposing of it in the least environmentally damaging way, taking into account the impact of its transportation.

National planning guidance on waste is still contained in PPS10 (which has not been superseded by the NPPF and is to be updated in a forthcoming National Waste Strategy) the

focus of which is the waste hierarchy in which the most desirable option is to reduce waste, then reuse, recycle, produce energy from it and finally send it to landfill.

The London Plan upholds this hierarchy and encourages waste to be seen as a resource to be exploited for benefit rather than a problem. The options for dealing with waste are becoming more innovative and as more waste is separated at source it can be reused and recycled more effectively. Tackling biodegradable waste has become a key priority with a target of none of this waste going to landfill by 2031. Bromley has responded to this pressure in part by introducing a kitchen waste collection scheme. This has successfully increased recycling from 40% of household waste in 2009/10 to 50% in 2011/12.

In terms of land use, the London Plan focuses on increasing London's capacity for managing waste to increase self sufficiency and it recognises that there is need for flexibility in light of changing methods of waste management. Each London Borough must allocate sufficient land and identify existing waste management facilities to provide capacity to manage the tonnages of waste apportioned in the London Plan. Boroughs can pool apportionment requirements. Existing waste sites should be protected and used to the maximum, and if a site is lost an additional compensatory site provision will be required.

Currently, the municipal waste management sites within the Borough are Churchfields and Waldo Road Depots, with planning permission recently obtained by a third party for an anaerobic digester (fast, sealed composting unit) which the Borough intends to use for its kitchen waste scheme. Bromley is part of the South East London Waste Partnership group which have pooled their resources to meet the apportionment figures. This means that Bromley is able to use waste management facilities in other boroughs with extra capacity, and vice versa. This allows greater flexibility and helps reduce the need to send waste over long distances for treatment or disposal. The Borough will continue to resist where possible the need for Bromley to be a through-route for waste disposal. In order to show how the apportionment targets are being met, the group of Boroughs produce a frequently updated Technical Paper which shows the capacity of each site in their area and the overall tonnages against the Plan targets. On the basis of this arrangement, Bromley does not have need of further capacity to meet the current London Plan target.

Strategic options

7. Waste management capacity

The London Plan requires Boroughs to ensure that they retain and if possible increase their waste capacity. Currently, Bromley is meeting its requirements through pooling resources with other Boroughs and so the priority is to maintain its current facilities. It is acknowledged that there whilst there are benefits in having the Waldo Road Depot in its current location in terms of waste collection, it also has limitations. In a recent study, alternative sites were not found but should one come up in the future, relocation – which must retain all the efficiency benefits and capacity of the existing site – may be an option.

Option 7A - PREFERRED - Retain and designate all existing waste management sites

Option 7B – PREFERRED - Consider additional sites to increase capacity where feasible

Development Management policies

Existing waste management sites should be designated and retained
Where capacity is lost from a site it should be reprovided elsewhere
Where possible, construction materials should be recycled on site into new development
New development should include adequate space for collecting recyclables
Site waste management plans should be included in planning proposals
Recycling and reuse of aggregates
Reparation of aggregate sites

Pollution

Vision

Our urban and natural environments are clean and healthy for people and wildlife. Our air and water is better protected from pollution and contaminated land is brought back into use through remediation. Nuisance from noise, dust and light pollution is kept to a minimum.

Policy objectives

The London Plan recognises the importance of making the Capital a cleaner, healthier city and the Boroughs should have planning policies to help reduce pollutants and minimise public exposure.

Local Plans should include policies to help reduce particular air pollutants identified in the National Air Quality Strategy, reduce the adverse impact of noise and encourage the remediation of contaminated land

Development Management Policies

Requirement for air quality assessments
Proposals for potentially polluting development
Reparation of contaminated land
Control of noise pollution
Ventilation
Control of light pollution
Hazardous substances

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