



BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

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DATE: 5 June 2023

To: Members of the
DEVELOPMENT CONTROL COMMITTEE

Councillor Alexa Michael (Chairman)
Councillor Keith Onslow (Vice-Chairman)
Councillors Jonathan Andrews, Peter Dean, Simon Fawthrop, Christine Harris,
Colin Hitchins, Alisa Igoe, Charles Joel, Kevin Kennedy-Brooks, Josh King,
Tony McPartlan, Tony Owen, Chloe-Jane Ross, Will Rowlands, Shaun Slator,
Alison Stammers and Melanie Stevens

A meeting of the Development Control Committee will be held at Bromley Civic Centre on **TUESDAY 13 JUNE 2023 AT 7.30 PM**

TASNIM SHAWKAT
Director of Corporate Services & Governance

A G E N D A

- 1 **APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**
- 2 **DECLARATIONS OF INTEREST**
- 3 **QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING**

In accordance with the Council's Constitution, members of the public may submit one question each on matters relating to the work of the Committee. Questions must have been received in writing 10 working days before the date of the meeting - by **5.00pm on Tuesday 30 May 2023.**

Questions seeking clarification of the details of a report on the agenda may be accepted within two working days of the normal publication date of the agenda – by **5.00pm on Wednesday 7 June 2023.**

- 4 **CONFIRMATION OF THE MINUTES OF THE MEETINGS HELD ON 18 APRIL AND 10 MAY 2023** (Pages 1 - 12)
- 5 **ADOPTION OF THE URBAN DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT** (Pages 13 - 240)
- 6 **ADOPTION OF THE ORPINGTON TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT** (Pages 241 - 438)

7 ENFORCEMENT PLAN 2023 (Pages 439 - 454)

The Council's [Local Planning Protocol and Code of Conduct](#) sets out how planning applications are dealt with in Bromley.

DEVELOPMENT CONTROL COMMITTEE

Minutes of the meeting held at 7.30 pm on 18 April 2023

Present:

Councillor Alexa Michael (Chairman)
Councillor Keith Onslow (Vice-Chairman)

Councillors Jonathan Andrews, Peter Dean, Simon Fawthrop,
Christine Harris, Alisa Igoe, Charles Joel, Josh King,
Tony McPartlan, Tony Owen, Chloe-Jane Ross, Shaun Slator,
Alison Stammers, Melanie Stevens and Pauline Tunnicliffe

Also Present:

Councillor Yvonne Bear

49 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

Apologies for absence were received from Councillor Mark Brock and Councillor Pauline Tunnicliffe attended as his substitute. Apologies for absence were also received from Councillor Kevin Kennedy-Brooks.

50 DECLARATIONS OF INTEREST

There were no additional declarations of interest.

51 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

One written question was received from a member of the public and is attached at Appendix A.

52 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 10 JANUARY 2023

RESOLVED: That the minutes of the meeting held on 10 January 2023 be agreed and signed as a correct record.

53 (22/01340/OUT) - BROMLEY SKI CENTRE, SANDY LANE, ST PAULS CRAY, ORPINGTON, BR5 3HY (ST PAUL'S CRAY WARD)

Description of Application: Outline planning permission for the redevelopment of the existing disused ski centre to construct 40 residential units with associated access, landscaping and parking (Outline permission in respect of access with other matters reserved).

The Planning Officer gave a brief presentation, providing an overview of the application and update on the report.

Oral representations in support of the application were received from the architect.

In opening the discussion, Councillor Tony McPartlan made representations on behalf of Councillors and Ward Members Chris Price and Rebecca Wiffen which highlighted the significant accessibility issues of the site which was located on a country road, including a lack of public transport and no pavement. For these reasons, the two Ward Members supported the Planning Officer's recommendation for refusal. The Chairman agreed with the points made and observed that, just as importantly, the site was also designated as Green Belt and that no very special circumstances had been demonstrated to justify causing harm to the openness of the Green Belt.

The Chairman moved that the planning application be refused as recommended. The motion was seconded by Councillor Simon Fawthrop, put to the vote and CARRIED unanimously.

RESOLVED: That PERMISSION BE REFUSED as recommended for the reasons set out in the report of the Assistant Director: Planning.

54 (22/04417/FULL1) - 306-310 COURT ROAD, ORPINGTON, BR6 9DA (ORPINGTON WARD)

Description of Application: Demolition of existing buildings and structures at No. 306 to 312 Court Road, erection of a 72-bed care home (Use Class Order Class C2) with associated car parking, landscaping and access (Revised description).

The Planning Officer gave a brief presentation, providing an overview of the application and update on the report.

Oral representations in support of the application were received from the agent who gave the following responses to Members' questions:

- The care home was a private facility with self-funded residents whose care the Local Authority would have no liability for funding. The average age of residents was anticipated to be 85+ years for an approximate stay of around 3 years, although younger people could be considered for residence where they met the criteria for care. Care home residents would benefit from access to a private garden secured by a 1.8-metre-high close boarded fence, providing a safe and nurturing environment.
- The proposed parking provision included separate staff and visitor parking areas with 14 electric vehicle charging points. Highways Officers had confirmed that the proposed number of parking spaces was correct for the anticipated level of usage. A robust car park

management plan would also be developed to ensure that members of the public did not make use of the car park, including clear signage. A staff travel plan would be put in place to encourage staff to use public transport where possible and it was noted that some care operators offered a minibus service from key transport hubs for their staff.

- With regard to sustainability, the scheme would benefit from hidden solar panels and a 185-metre squared green roof. The potential for rainwater harvesting on-site had been raised by Councillor Simon Fawthrop and would be considered as part of the drainage strategy. It was proposed to use an air source heat pump in the scheme as it was not possible to undertake exploratory works to identify whether the site was suitable for a ground source heat pump until the existing building was demolished. Should an air source heat pump be used, a planning contribution would be secured by a legal agreement to reflect the shortfall in carbon reduction. However, if it was later identified that a ground source heat pump was feasible, this aspect of the scheme could be resubmitted for permission.
- The agent agreed that a condition be added to fix permanently landing windows overlooking Charterhouse Road to protect the privacy of local residents. This would be in addition to the existing proposal to fit windows with an obscure glaze.

The Chairman invited Councillor and Ward Member Pauline Tunnicliffe to open the debate. Councillor Tunnicliffe advised that she and her Ward Member colleague, Councillor Kim Botting were fully in support of the application which would enhance the area and meet an important local need. Councillor Alisa Igoe observed that the scheme was based on a busy road and junction and queried whether it would be appropriate to seek a Section 106 contribution from the developer for road safety measures. The Planning Officer explained that Highways Officers had not identified any highway safety issues in connection with the proposed scheme and Councillor Simon Fawthrop further noted that an unrelated road safety scheme was already being developed with respect to Court Road.

Councillor Pauline Tunnicliffe moved that the planning application be approved as recommended. The motion was seconded by Councillor Simon Fawthrop, put to the vote and CARRIED unanimously.

RESOLVED: That PERMISSION BE GRANTED subject to legal agreement and conditions as recommended for the reasons set out in the report of the Assistant Director: Planning.

55 NATIONAL PLANNING POLICY FRAMEWORK UPDATE Report HPR2023/014

The Committee considered a report providing an update on Government proposals to amend the National Planning Policy Framework, including a

consultation exercise to which the Local Authority had submitted a detailed response. The report had also been reviewed by the Renewal, Recreation and Housing PDS Committee on 21 March 2023 and the Committee had noted the update.

In response to a number of questions from Members, the Head of Planning Policy and Strategy explained that the National Planning Policy Framework provided useful clarification across a wide range of planning areas including that there was no requirement for Local Planning Authorities to allocate sites at densities that were significantly out-of-character with an existing area, if this was the only way to meet housing need in full. The need for plans and drawings of proposed schemes to be clear and accurate was also stressed within the Framework.

A Member was pleased to note that both approvals and completions would be considered as part of future housing delivery targets which would ensure that the Local Authority was not penalised where agreed schemes were not delivered by developers in a timely manner. Another Member queried whether this would strengthen the Local Authority's position in working with developers and the Head of Planning Policy and Strategy confirmed that the Planning Service already engaged closely with all developers to secure the best outcomes for Bromley in terms of addressing adopted policy requirements. The Head of Planning Policy and Strategy advised that key local development concerns such as height and depth of new developments would be considered as part of the Local Plan review.

A Member underlined the importance of ensuring accessibility was at the forefront of planning policy and the Head of Planning Policy and Strategy confirmed that there was a strong focus on accessibility within national, regional and local design policy, although works that did not require planning policy came under building regulations which may not be as stringent.

The Chairman requested that the Local Authority's response to the consultation be circulated to Committee Members following the meeting.

RESOLVED: That the report be noted.

56 PLANNING APPLICATION FEES CONSULTATION

Report CSD23058

The Committee considered a report outlining a Government consultation on planning application fees which were set at a national level and seeking Members' views on the Local Authority's response.

The Assistant Director: Planning advised that the Government was proposing that planning application fees be increased alongside changes made to the existing performance management arrangements, including no longer including extensions of time. The work of the Planning Service was currently subsidised by the Local Authority and there was a need to identify whether

this subsidy would be adjusted in light of the additional fee income or whether the increased fees would allow for more investment in the Planning Service.

Members discussed the proposal to create a deterrent for retrospective planning applications by doubling fees. While some Members felt this would provide a means to penalise those deliberately seeking to circumvent planning processes while not unduly penalising those making a genuine mistake, other Members felt the fee for retrospective planning applications should be higher. A Member suggested that the Local Authority express support for Gareth Bacon MP's 10 Minute Rule Bill on Unauthorised Development (Offences) that proposed that development without permission be made a criminal offence and the Committee agreed that this be included in the Local Authority's response to the consultation.

RESOLVED: That the proposals within the Government consultation on planning application fees be supported.

57 PLANNING APPEALS UPDATE
Report CSD23059

The Committee considered a report outlining the Local Authority's performance on planning appeals for the 2022/23 financial year.

RESOLVED: That the report be noted.

58 DELEGATED ENFORCEMENT ACTION (OCTOBER TO DECEMBER 2022)
Report HPR 2023/022

The Committee considered a report outlining enforcement action authorised under Delegated Authority for the period 1 October to 31 December 2022 in respect of development undertaken without the benefit of planning permission.

RESOLVED: That the report be noted.

The Meeting ended at 9.05 pm

Chairman

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**DEVELOPMENT CONTROL COMMITTEE
18 APRIL 2023**

THE FOLLOWING QUESTIONS HAVE BEEN SUBMITTED FOR WRITTEN REPLY

1. From Dermot Mckibbin:

With regard to Agenda Item 10: Delegated Enforcement Action (October to December 2022):

How many of the HMO's prosecuted under planning legislation were licensable HMO's, were these owners prosecuted under the Housing Act and if not, why not? Will the Council act under Planning and Housing law simultaneously?

Reply:

None of the current investigations into Houses in Multiple Occupancy have proceeded to prosecution as there have been no breaches of planning control where an enforcement notice has been issued and not complied with. The Housing Act requires that the Local Housing Authority must take all reasonable steps to ensure that applications for licenses are made to them in respect of HMOs in their area which are required to be licensed, and the Local Authority would therefore seek an application in the first instance prior to prosecuting. Should it be established that there was a breach of enforcement notice by an HMO, the Local Authority's Legal Service would issue legal proceedings and as Planning and Housing Law operate separately, the Local Authority would be able to act under both where appropriate.

It should be noted that with regard to HMOs, a planning offence does not indicate a licensing offence and vice versa, and where a property meets the relevant legal criteria, the Public Protection and Enforcement Service would issue a license regardless of Planning status.

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DEVELOPMENT CONTROL COMMITTEE

Minutes of the special meeting held at 8.18 pm on 10 May 2023

Present:

Councillor Alexa Michael (Chairman)
Councillors Jonathan Andrews, Peter Dean, Simon Fawthrop,
Christine Harris, Alisa Igoe, Charles Joel, Kevin Kennedy-Brooks,
Josh King, Tony McPartlan, Tony Owen, Chloe-Jane Ross,
Shaun Slator, Alison Stammers, Melanie Stevens, Colin Hitchins
and Will Rowlands

60 PROPORTIONALITY OF SUB-COMMITTEES

RESOLVED that the Committee size and proportionately indicated below be agreed.

	Size	Con	Lab	LDem	Chis	BH Ind	Ind
Plans Sub No. 1	9	6	1	1	1	-	-
Plans Sub No. 2	10	6	2	1	-	1	-
Plans Sub No. 3	9	5	1	1	1	-	1
Plans Sub No. 4	9	6	2	1	-	-	-

61 MEMBERS OF SUB-COMMITTEES

RESOLVED that the following Schedule of Members to serve on the Sub-Committees of the Development Control Committee be agreed.

(i) PLANS SUB-COMMITTEE NO. 1

	Councillors
1	Cllr Jonathan Andrews (CON)
2	Cllr Kira Gabbert (CON)
3	Cllr Christine Harris (CON)
4	Cllr Colin Hitchins (CON)
5	Cllr Alexa Michael (CON)
6	Cllr Tony Owen (CON)
7	Cllr Ruth McGregor (LAB)
8	Cllr Graeme Casey (LDEM)
9	Cllr Mark Smith (CHIS)

(ii) PLANS SUB-COMMITTEE NO. 2

	Councillors
1	Cllr Mark Brock
2	Cllr Peter Dean
3	Cllr Simon Fawthrop
4	Cllr Charles Joel
5	Cllr Keith Onslow
6	Cllr Will Rowlands
7	Cllr Chris Price (LAB)
8	Cllr Ryan Thomson (LAB)
9	Cllr Will Connolly (LDEM)
10	Cllr Sophie Dunbar (BH IND)

(iii) PLANS SUB-COMMITTEE NO. 3

	Councillors
1	Cllr Jonathan Andrews (CON)
2	Cllr Dr Sunil Gupta (CON)
3	Cllr Christine Harris (CON)
4	Cllr Alexa Michael (CON)
5	Cllr Tony Owen (CON)
6	Cllr Alisa Igoe (LAB)
7	Cllr Julie Ireland (LDEM)
8	Cllr Mark Smith (CHIS)
9	Cllr Shaun Slator (IND)

(iv) PLANS SUB-COMMITTEE NO. 4

	Councillors
1	Cllr Felicity Bainbridge (CON)
2	Cllr Peter Dean (CON)
3	Cllr Simon Fawthrop (CON)
4	Cllr Charles Joel (CON)
5	Cllr Keith Onslow (CON)
6	Cllr Will Rowlands (CON)
7	Cllr Kevin Kennedy-Brooks (LAB)
8	Cllr Kathy Bance (LAB)
9	Cllr Sam Webber (LDEM)

62 APPOINTMENT OF CHAIRMEN AND VICE-CHAIRMEN OF SUB-COMMITTEES

RESOLVED that the following Councillors be appointed as Chairmen and Vice Chairmen of the Sub-Committees of the Development Control Committee.

Plans Sub No.1	Cllr Alexa Michael	Cllr Christine Harris
Plans Sub No. 2	Cllr Peter Dean	Cllr Charles Joel
Plans Sub No. 3	Cllr Jonathan Andrews	Cllr Tony Owen
Plans Sub No. 4	Cllr Simon Fawthrop	Cllr Will Rowlands

The Meeting ended at 8.19 pm

Chairman

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Report No.
HPR2023/039

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

**FOR PRE-DECISION SCRUTINY AT THE RENEWAL,
RECREATION AND HOUSING PDS COMMITTEE AND
DEVELOPMENT CONTROL COMMITTEE**

Date: DCC: 13 June 2023
RRH PDS: 15 June 2023
Executive: 5 July 2023

Decision Type: Non-Urgent Executive Key

Title: **ADOPTION OF THE URBAN DESIGN GUIDE SUPPLEMENTARY
PLANNING DOCUMENT**

Contact Officer: Ben Johnson, Head of Planning Policy and Strategy
E-mail: ben.johnson@bromley.gov.uk

Chief Officer: Tim Horsman, Assistant Director (Planning)

Ward: All Wards

1. Reason for report

- 1.1. This report recommends the adoption of the Urban Design Guide Supplementary Planning Document (SPD). The SPD provides guidance on urban design to inform development proposals coming forward in Bromley, with the aim of ensuring consistent high quality design.
 - 1.2. A draft SPD underwent public consultation from 28 October 2022 to 9 December 2022. A number of responses were received covering various issues. The final SPD includes a number of amendments in response to comments received.
-

2. RECOMMENDATION(S)

For Development Control Committee and Renewal, Recreation and Housing PDS Committee:

- 2.1 That members note the Urban Design Guide Supplementary Planning Document (shown at Appendix 1) will be presented to Executive for adoption.

For the Council's Executive:

- 2.2 That Executive adopt the Urban Design Guide Supplementary Planning Document (shown at Appendix 1) as a local development document, subject to any further minor changes (e.g. related to formatting or mapping) prior to adoption.**
- 2.3 That Executive withdraw the following documents:**
- **Supplementary Planning Guidance 1 - General Design Principles**
 - **Supplementary Planning Guidance 2 - Residential Design Guidance**
 - **Design guides for shop fronts in Beckenham, Chislehurst and Bromley North Village**

Impact on Vulnerable Adults and Children

1. Summary of Impact: No Impact
-

Transformation Policy

1. Policy Status: Existing Policy – document provides guidance to assist the implementation of adopted Development Plan policy set out in the Bromley Local Plan and the London Plan.
 2. Making Bromley Even Better Priority (delete as appropriate):
(3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
-

Financial

1. Cost of proposal: Costs associated with publicising the adopted SPD will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2023/24
-

Personnel

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Town and Country Planning (Local Planning) (England) Regulations 2012
 2. Call-in: Applicable: Further Details – Executive Decision
 3. It is necessary to have due regard to the public sector equality duty, which sets out the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations between people who share a protected characteristic and people who do not share it. It is not anticipated that adoption would adversely affect any of those objectives.
-

Procurement

1. Summary of Procurement Implications: N/A
-

Property

1. Summary of Property Implications: N/A
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: the SPD will assist the implementation of Development Plan policies which seek design which responds to the impacts of climate change, is fit for purpose and adaptable over time and adopts technologies to minimise their environmental impact.
-

Impact on the Local Economy

1. Summary of Local Economy Implications: The Urban Design Guide SPD supports the implementation of London Plan and Local Plan economic policies.
-

Impact on Health and Wellbeing

1. Summary of Health and Wellbeing Implications: The Urban Design Guide SPD supports the implementation of London Plan and Local Plan policies relating to health and wellbeing.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? No
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

Background

- 3.1 The National Planning Policy Framework (NPPF) encourages local planning authorities (LPAs) to prepare design guides to provide maximum clarity about design expectations at an early stage. Such guides should be consistent with the principles set out in the National Design Guide (NDG) and National Model Design Code (NMDC); and reflect local character and design preferences. In the absence of locally produced design guides, these national documents should be used to guide decisions on applications.
- 3.2 Design guides provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. They can also provide a basis for developing design codes; the Government have suggested that LPAs will, in future, be required to produce design codes. The guidance in the SPD has been developed by the Council's policy and urban design officers, with consideration of the national, London-wide and local planning framework, including the emphasis on design quality in national policy.

Consultation on the draft Urban Design SPD

- 3.3 Executive approved the draft Urban Design Guide SPD for consultation at their meeting of 6 October 2022¹. The Council consulted on the draft SPD from 28 October 2022 to 9 December 2022. The consultation statement (provided at Appendix 2) sets out details of how the consultation was undertaken (section 2); and summaries of the responses received and details of how the Council has addressed these responses in the final SPD (section 3).

Proposed adoption draft Urban Design Guide SPD

- 3.4 The Urban Design Guide SPD is a technical document which provides guidance on urban design to inform development proposals coming forward in Bromley, with the aim of ensuring consistent high quality design. The proposed adoption draft SPD at Appendix 1 includes a number of amendments in response to comments received during the public consultation, as well as additional amendments following further internal discussions.
- 3.5 The SPD first sets out the national, London and local planning policy framework which informs the document. Several amendments have been made to this section, including the addition of references to the listed building consent regime and information about pre-app services of statutory bodies who may be involved in the decision-making process.
- 3.6 It then sets out a broad character appraisal of the borough, focusing on historical development in the borough and then the character of Bromley today. With reference to current character, the SPD assesses character based on a number of 'places', which are not rigidly delineated areas and hence deliberately overlap, acknowledging the gradual transition from one place to another. These 'places' differ from wards, which are defined for electoral purposes, and whose sharp boundaries may cut through places and communities. The 'places' map has been revised for clarity. Several of the 'places' character descriptions have been amended to include new/amended details.

¹ URBAN DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT – CONSULTATION DRAFT, available from: <https://cde.bromley.gov.uk/documents/s50100154/Exec%20210922%20Urban%20Design%20Guide%20SPD%20Report.pdf>

3.7 After establishing the borough character appraisal, the SPD sets out the following principles for achieving good design with the aim of significantly raising the quality of development within the borough:

- Contextual (Character and Identity)
- Responsive (Architecture and Landscape)
- Connected (Movement and Connectivity)
- Inclusive (Access and Inclusion)
- Healthy (Health and Well-being)
- Sustainable (Sustainable Design, Adaptability and Resilience)

3.8 The SPD then provides detailed guidance for each principle. The guidance introduces each characteristic and its importance to good urban design, its relevance to national/regional/local policy guidance, and its application within the context of Bromley. Specific requirements are provided in the form of detailed design guidance notes which include links to relevant planning policies. A number of precedent images are used to highlight good examples of each principle.

3.9 There have been a number of changes to the guidance (including the guidance notes). These include:

- An amendment to DG2 to clarify the process for assessing harm to a heritage asset, in line with the NPPF.
- The addition of a guidance note on architectural design to summarise the requirements set out in the guidance.
- Reference to solar tiles, with encouragement to use them instead of solar panels in more sensitive areas of the borough (such as conservation areas or ASRCs) in order to minimise visual impacts.
- Additional guidance on artificial nesting (e.g. bird boxes, swift bricks) and native plant species.
- The addition of a guidance note on landscape design to summarise the requirements set out in the guidance.
- A new section and guidance note on designing out crime.
- A new section on biodiversity, including reference to biodiversity net gain.
- The addition of further policy and guidance references to a number of design guidance notes.

4. TRANSFORMATION/POLICY IMPLICATIONS

4.1 SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.

4.2 The Urban Design Guide SPD provides guidance to assist with the implementation of the Local Plan, London Plan, NPPF and other documents.

4.3 The SPD includes a detailed section on Shopfront Design. In 2021, Development Control Committee informally approved three shopfront guides for publication on the Council's website²; these informal guides cover Beckenham, Chislehurst and Bromley North Village.

² <https://www.bromley.gov.uk/planning-policy/shop-fronts-guidance>

These guides have been used to inform the SPD section on Shopfront Design. Upon adoption of the Urban Design Guide, the three guides will be removed from the website to avoid any confusion over the role of these informal documents.

- 4.4 The Council also has two extant Supplementary Planning Guidance (SPG) documents³ - Supplementary Planning Guidance 1 - General Design Principles; and Supplementary Planning Guidance 2 - Residential Design Guidance. These documents provided guidance on a number of UDP policies; although the UDP has now been superseded by the Local Plan, these two SPG documents have, to date, remained material considerations where justified, albeit their weight is very limited. Upon adoption of the Urban Design Guide, these SPGs will cease to have any relevance and would no longer be material to decision-making in Bromley. They will be removed from the Council's website as a result.

5. FINANCIAL IMPLICATIONS

- 5.1 The production of the Urban Design Guide SPD and the costs associated with adoption will be funded from the Planning Policy and Strategy budget.

6. LEGAL IMPLICATIONS

- 6.1 The SPD has been prepared in line with relevant planning guidance and regulations, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). If adopted, the SPD will be a material consideration in the determination of relevant planning applications. Any requirements relating to adoption will be undertaken in line with regulations.
- 6.2 A Screening Statement to determine the need for a Strategic Environmental Assessment (SEA) has been prepared by officers, in accordance with the requirements of European Directive 2001/42/EC; and the Environmental Assessment of Plans and Programmes Regulations 2004; this is provided at Appendix 3. The screening has concluded that an SEA does not need to be prepared as the SPD does not introduce new policies but provides further guidance on adopted Development Plan policy. This policy has been sufficiently appraised in the Sustainability Appraisals of the Local Plan and London Plan documents; it is considered that the Urban Design Guide SPD will not result in any additional significant effects to those already identified through these higher-level Sustainability Appraisals.
- 6.3 This approach is consistent with national planning guidance which states that SPDs are only likely to require an SEA in exceptional circumstances, where they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies.
- 6.4 There is a requirement to consult three statutory consultation bodies designated in the SEA Regulations (the Environment Agency, Historic England and Natural England) on whether an environmental assessment is required. Officers have consulted each of the three bodies prior to the consultation on the draft SPD and as part of the draft SPD consultation. Comments received are set out in Appendix 3. Only Natural England responded in relation to the SEA; they noted agreement with the Council's SEA screening statement and considered that an SEA is not necessary.

³ <https://www.bromley.gov.uk/downloads/download/80/adopted-supplementary-planning-guidance>

7. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

7.1 The Urban Design Guide SPD supports the implementation of London Plan and Local Plan policies on carbon reduction. The SPD does not introduce new policy but will help to deliver existing sustainable design policy and lead to positive outcomes.

8. IMPACT ON THE LOCAL ECONOMY

8.1 The Urban Design Guide SPD supports the implementation of London Plan and Local Plan economic policies. The SPD includes guidance on non-residential development (e.g. industrial space) and shopfronts, which will support the delivery of well-designed economic uses.

9. IMPACT ON HEALTH AND WELLBEING

9.1 The Urban Design Guide SPD supports the implementation of London Plan and Local Plan policies relating to health and wellbeing. The SPD includes the 'Healthy' design principle which promotes healthy living by ensuring that new development seeks to maximise opportunities to support and enhance health and well-being, encouraging physical activity, providing accessible and adaptable homes, ensuring social inclusion and access to open space particularly in areas of deficiency, and optimising health benefits throughout each stage of the design process.

<p>Non-Applicable Sections:</p>	<p>IMPACT ON VULNERABLE ADULTS AND CHILDREN</p> <p>PERSONNEL IMPLICATIONS</p> <p>PROCUREMENT IMPLICATIONS</p> <p>PROPERTY IMPLICATIONS</p> <p>CUSTOMER IMPACT</p>
<p>Background Documents: (Access via Contact Officer)</p>	<p>Bromley Local Plan 2019, available from: https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan</p> <p>London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>National Planning Practice Guidance – https://www.gov.uk/guidance/plan-making</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - https://www.legislation.gov.uk/uksi/2012/767/contents</p>

Urban Design Guide Supplementary Planning Document

Adopted July 2023

Bromley Council

Urban Design Guide Supplementary Planning Document – adopted 5 July 2023

For more information about this document, please contact:

Bromley Planning Policy Team

Email: ldf@bromley.gov.uk

1.	Introduction	1
	What is urban design and why is it important?	1
	A Vision for Bromley	1
	Purpose of the document	2
	Status of the document.....	2
	Who is the document for?	3
	How to use the document	3
2.	Policy Framework and Planning Application Process	4
	National planning policy and guidance	5
	London planning policy and guidance	5
	Local planning policy	6
	The planning application process.....	7
3.	Character Appraisal - Understanding Bromley	9
	Historical Development.....	9
	Bromley Today.....	13
	Borough Places	15
4.	Principles of Good Design	28
	The role of planning	28
	The characteristics of successful places.....	28
	Approach.....	30
	Design Principles	32
5.	Design Guidance	36
	Contextual	37
	Character and Identity.....	37
	Heritage and Conservation	40
	Responsive	43

Layout.....	43
Scale and Massing	48
Tall Buildings	51
Architectural Design	56
Materials and Detailing	64
Housing Design	77
Mixed-Use Development	83
Non-Residential Development.....	88
Shopfront Design	94
Landscape.....	106
Public Realm.....	114
Public Art.....	123
Connected.....	126
Movement.....	126
Streets	127
Legibility.....	129
Inclusive	132
Inclusive Design	132
Housing Mix	132
Designing Out Crime.....	136
Healthy	140
Open Green Spaces	140
Community Amenity.....	143
Healthy homes	147
Healthy streets.....	149
Sustainable	152

Resources and Efficiency	152
Sustainable Construction	155
Green Infrastructure	157
Urban Greening	159
Biodiversity	161
Adaptability and Resilience	163

1. Introduction

What is urban design and why is it important?

- 1.1. Urban design is the art of making places for people. It concerns the connections between people and places, movement and urban form, nature and the built fabric, and the processes for ensuring successful villages, towns and cities¹.
- 1.2. Urban design is essentially about placemaking, analysing, organising and shaping the urban form, knitting together the townscape, unlocking physical, social, and cultural assets to create and enhance local identity. Successful places are dependent on good design, they require a people first approach; a richer mix of uses and activities breathes life into a town or city creating a spirit, vibrancy and a sense of place.
- 1.3. Good urban design adds value by increasing the economic viability of development and by delivering social and environmental benefits². A key objective in achieving good urban design is to adopt an integrated approach to development where all elements combine successfully to deliver greater social, economic, and environmental value and long-term sustainability for the benefit of all stakeholders. This objective underpins the purpose of this guidance.

A Vision for Bromley

- 1.4. The Bromley Local Plan sets out the Vision for the Borough through to the 2030's:

“Bromley is known for the high quality of its living, working and historic 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 values its distinctive neighbourhoods, ranging from the rural to suburban and urban. 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.

The protection and enhancement of conservation areas and heritage assets, along with high quality new development have contributed to civic pride and wellbeing.

The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley's special character and the health and wellbeing of local residents and visitors alike.

Bromley has high levels of educational attainment, whilst strong and diverse businesses are able to invest to support a thriving economy.”

- 1.5. In accordance with the aims and objectives set out in the Local Plan, the overriding vision is to support opportunities for sustainable growth whilst ensuring that the existing character and identity of Bromley reflected by its distinctive rural, suburban, and urban neighbourhoods, conservation areas and heritage assets, Green Belt countryside, and a thriving local economy is retained and enhanced.

¹ By Design, CABE, 2000

² The Value of Urban Design, CABE and DETR, 2001

- 1.6. The wider regeneration of the borough provides the opportunity to build sensitively on Bromley's history and heritage whilst delivering new high-quality housing, public realm and community facilities.
- 1.7. Within this context, the Urban Design Guide Supplementary Planning Document (SPD) seeks to reflect and build upon existing physical, social and cultural assets of Bromley with the aim of sensitively stitching new development into the existing urban fabric to strengthen and reinforce a sense of place and local identity.
- 1.8. The SPD also aims to significantly raise the quality of spatial, urban and architectural design in Bromley and to strengthen and enhance local character in all new development, raising expectations through high quality design. Delivery of these aims will help to ensure continued investment and economic growth.
- 1.9. Historically the borough has tended to undertake regeneration projects in isolation; however, by considering regeneration more holistically, the benefits can be more far-reaching. Among the key objectives for any development proposal or regeneration scheme is to create greater consistency and continuity of design, transforming an existing fragmented town centre townscape into a more cohesive coherent whole.
- 1.10. All new development across the borough will be expected to reflect the history, character, and future aspirations of Bromley as set out in the Local Plan, as well as reflecting the needs and collective values of the local community.

Purpose of the document

- 1.11. The purpose of this document is to provide clear guidance on urban design to inform and engage developers, applicants, planning officers, residents and all other interested parties in bringing forward proposals for development in Bromley.
- 1.12. The document sets out the principles for achieving good design with the aim of significantly raising the quality of development within the borough. Key aspects of local character are highlighted alongside illustrative design guidance to ensure that new development is delivered sensitively and cohesively, achieving a sense of unity without uniformity.
- 1.13. The guidance is not intended to be overly prescriptive but aims to provide an overarching spatial vision outlining key design principles that should be followed, whilst also allowing for flexibility to encourage richness, variety and innovation in future detailed designs.
- 1.14. The aim is to promote good quality design for buildings, landscape, and public realm, establishing the desired characteristics for successful places and providing a quality benchmark for how new development should look and feel.

Status of the document

- 1.15. This SPD provides guidance on the interpretation of adopted planning policies as they relate to various aspects of design; it does not set out new planning policy, as this cannot be done in an SPD.
- 1.16. The Urban Design Guide SPD will be an important material consideration in the determination of future planning applications. Development proposals will therefore

need to take into account the guidance set out within this document, in addition to other relevant guidance and strategies.

1.17. This SPD will replace extant supplementary planning guidance set out in the General Design Principles SPG and Residential Design Guidance SPG.

Who is the document for?

1.18. This document is intended to provide clear guidance on urban design primarily for developers, architects and planners. However, whilst this is a technical document the principles and objectives outlined within are intended to inform and engage a wide range of stakeholders including Council Members and local residents in addition to built environment professionals and all other interested parties. These may include:

- Planners, architects, landscape architects, and professional consultants
- Investors, developers and project delivery organisations
- Local Planning Authority and Council Members
- Local residents and community groups
- Special interest groups (i.e. conservation and heritage)

How to use the document

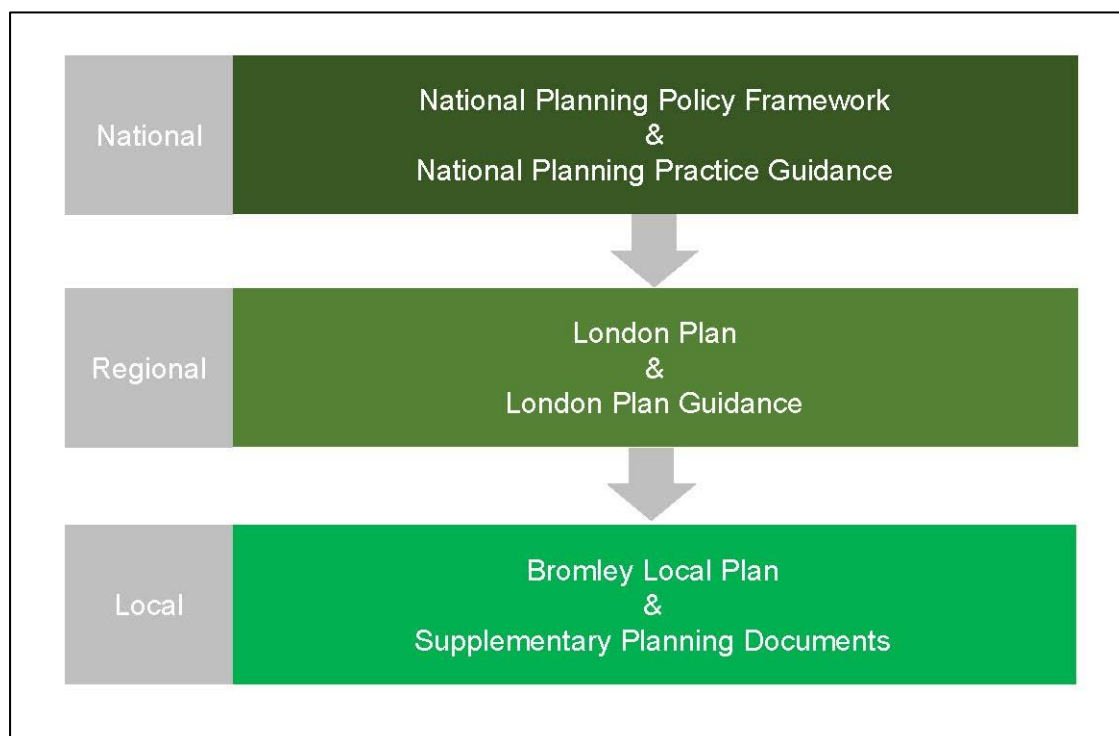
1.19. This document is divided into five sections including this introduction:

- Section 2 – Policy Framework and Planning Process- sets out the relevant policy guidance and how this should be interpreted in relation to development proposals for Bromley. This section outlines national, regional and local policy and guidance which includes the Local Plan and supporting documents; and also introduces the planning application process, highlighting the key requirements for major development proposals.
- Section 3 – Character Appraisal - Understanding Bromley - provides key information about Bromley as a place and its important qualities, outlining which aspects of place should be taken into account in planning and designing new development. This section includes a study of the borough's historical development and the evolution of Bromley as it is today, which includes designated Metropolitan and Major Town Centres, open greenbelt countryside, designated conservation areas and areas of special residential character.
- Section 4 – Principles of Good Design - identifies the key principles of good urban design which should be considered and applied to future development proposals. This section highlights the key characteristics of successful well-designed places which include character and identity, responsive architecture and landscape, movement and connectivity, access and inclusion, healthy environments, sustainable design, adaptability and resilience.
- Section 5 – Design Guidance - illustrates how principles of good design should be applied to development proposals in Bromley. A number of specific and measurable objectives provide clarity in relation to the Council's expectations in achieving successful design outcomes. Guidance is provided through detailed 'SPD guidance notes' – DG1, DG2, etc - which include references to relevant policies and guidance where appropriate (these are not-exhaustive and there may be other relevant policies which apply).

2. Policy Framework and Planning Application Process

- 2.1. Well-designed buildings and places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post-approval stage.
- 2.2. The policy framework for Bromley encompasses planning policy and guidance at a national, regional and local level. The SPD should be read in conjunction with all relevant national, regional, and local design policy and guidance. The key policy and guidance set out below should not be considered exhaustive; where new guidance is published which is relevant to design considerations in Bromley, the SPD should also be read in conjunction with this new guidance. This includes the Bromley Town Centre and Orpington Town Centre SPDs.
- 2.3. The design guidance set out in this document reflect the priorities and aspirations of the Council. The document expands on the key principles set out at national, regional, and local level and suggests how development proposals in Bromley can achieve them. In some instances, the guidance provides a finer framework of design quality requirements based on a good understanding of existing local character and emerging context(s).

Figure 1 – policy framework diagram



National planning policy and guidance

- 2.4. The National Planning Policy Framework³ (NPPF) sets the national policy context for preparation of local plans. Local Plans must be consistent with national policy and should enable the delivery of sustainable development in accordance with the policies in the NPPF. The NPPF is also capable of being a material consideration in the determination of planning applications. The current version of the NPPF was published in July 2021. National Planning Practice Guidance⁴ (PPG) provides further detail on various aspects of the NPPF.
- 2.5. The Government sets out a framework for achieving well-designed places in Chapter 12 of the National Planning Policy Framework. Paragraph 126 emphasises the value of good design as a key aspect of sustainable development. Paragraph 128 highlights the need for design guides in order to deliver a consistent and high-quality standard of design
- 2.6. Paragraph 130 emphasises the need to ensure visual and functional design quality; to respect local character and establish a sense of place; optimise site potential to accommodate an appropriate amount and mix of development; and to create places that are safe, inclusive and accessible which promote health and well-being.
- 2.7. The NPPF advises that *“significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”* (Paragraph 134)
- 2.8. To be read alongside this guidance are two important Planning Policy Guidance notes: Design: Process and Tools⁵ and the National Design Guide⁶. The National Design Guide sets out the ten characteristics of well-designed places and explains what good design means in practice.

London planning policy and guidance

- 2.9. The Mayor of London sets out a planning framework for ‘Good Growth’ in the London Plan, defined as growth that is socially and economically inclusive and environmentally sustainable.
- 2.10. To deliver this, each of the policy areas in the London Plan are informed by six Good Growth objectives:
 - GG1 Building strong and inclusive communities
 - GG2 Making the best use of land
 - GG3 Creating a healthy city

3 National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

4 Planning Practice Guidance, available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

⁵ Design: process and tools, available from: <https://www.gov.uk/guidance/design>

⁶ National Design Guide (January 2021), available from: <https://www.gov.uk/government/publications/national-design-guide>

- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

2.11. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment. The chapter is broken down into 14 individual design policies, each with specific criteria and supporting text.

2.12. The GLA have recently consulted on four new pieces of London Plan Guidance (LPGs) relating to design and housing quality. The LPGs listed below supersede the Draft Good Quality Homes for All Londoners SPG which was previously consulted on in late 2020.

- Characterisation and Growth Strategy
- Small Site Design Codes
- Optimising Site Capacity: A Design-led Approach
- Housing Design Standards

2.13. The first three documents focus on the policy plan-making stage; the last document focuses on standards for the development management application stage. The intention of the guidance is to front-load design considerations/assessments at an early stage before development proposals reach the decision-making stage, i.e. providing additional clarity on key design matters from the outset to reduce the risk at application stage.

Local planning policy

2.14. The Bromley Local Plan (2019) sets out the borough's planning policies and reflects its commitment to improving the quality of the natural and built environment. The Local Plan is underpinned by Bromley's 2030 vision for high quality living, working, historic and natural environments, including its valued and distinctive neighbourhoods. New development of all kinds should be well-designed, safe, energy-efficient and should complement the surroundings, respecting scale and layout.

2.15. The key objectives for Design and the Public Realm are to:

1. Ensure development attains high-quality design standards
2. Ensure development includes appropriate well-planned private or public open space that promotes and enhances biodiversity
3. Ensure public areas are well-designed, safe and accessible

2.16. Policy 37 – General Design of Development – requires all development proposals to be of a high standard of design and provides specific criteria in relation to architectural quality (scale, form, layout and materials), context (townscape character and heritage), spaces between buildings (hard and soft landscaping), amenity (daylight and sunlight), access and inclusion, and sustainable design and construction. General design guidance is supplemented with specific policies for statutory listed buildings, locally listed buildings and non-designated heritage assets, conservation areas and areas of special residential character in order to preserve and enhance the character and appearance of valued assets and distinctive settings.

2.17. Policy 47 – Tall & Large Buildings – requires tall and large buildings to make a positive contribution to the immediate setting and the wider townscape, appropriate to their location/context and to be of the highest architectural design quality. Policy 48 – Skyline – requires development to protect or enhance specific views and landmarks.

The planning application process

2.18. Most new development requires planning permission, from small scale extensions and alterations to large scale development proposals and major changes to existing buildings and/or the local environment. Detailed guidance on the planning application process is available from the planning portal website⁷.

2.19. The Council has published validation guidance and local information requirements⁸ for planning applications which we advise all applicants to view in order to help submit a valid application.

2.20. All major planning applications must include a Design and Access Statement which should demonstrate how the proposal meets the design requirements of the Development Plan and how the proposal responds to each of the Council's six overarching Design Principles set out in Section 4.

2.21. Design and Access Statements are important documents that explain the thinking behind the development proposal. The level of detail provided should be proportionate to the scale and complexity of the development being proposed and should include the following steps:

- assessment (site and policy context);
- involvement (professional and community engagement);
- evaluation (opportunities and constraints); and
- design (concept/design development)⁹.

2.22. Applications for sites within conservation areas or within the setting of a listed building(s) should also be accompanied with a Heritage Impact Assessment. Applications involving listed buildings require Listed Building Consent, and any proposed works to a Scheduled Monument will require consent from the Department of Culture, Media and Sport and advice from Historic England. Applicants proposing development that is likely to have archaeological implications should seek advice from the Greater London Archaeology Advisory Service (GLAAS)¹⁰.

2.23. The Council offers a pre-application advice service¹¹ to enable applicants to discuss the detailed design of a proposal prior to submission and/or advise on revisions following the determination of applications. We also offer an 'in principle' pre-application service for major development proposals for larger sites to advise on appropriate land uses.

⁷ <https://www.planningportal.co.uk/planning/planning-applications>

⁸ https://www.bromley.gov.uk/info/485/planning_applications/1203/planning_validation_requirements

⁹ Further guidance on preparing Design and Access Statements is available from: <https://www.designcouncil.org.uk/our-work/skills-learning/resources/design-and-access-statements-how-write-read-and-use-them/>

¹⁰ <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

¹¹ Details of the pre-application service, including relevant forms, are available from: https://www.bromley.gov.uk/info/485/planning_applications/511/pre-application_planning_advice

- 2.24. At the pre-application stage applicants should also consider other bodies which may be involved in the decision-making process. Applicants are encouraged to contact appropriate statutory bodies at an early stage in the pre-application process.
- 2.25. For proposals affecting the historic environment, including Listed Buildings and Conservation Areas, Historic England provides initial, formal, and/or extended pre-application advice for applicants¹². Historic England also produce advice and guidance notes covering a variety of heritage-related topics.
- 2.26. For development proposals in flood zones 2 and 3 and/or on land affected by contamination, the Environment Agency provides site-specific pre-application advice which includes bespoke technical advice and an early indication of permitting requirements¹³.
- 2.27. In accordance with London Plan policy D4 requirements, all major development proposals referable to the Mayor of London must be subject to design scrutiny by an independent Design Review Panel and must undergo at least one design review as part of the pre-application process. The format of design reviews should be agreed with the Council. Major development proposals and/or proposals for smaller sensitive sites will be subject to independent design review provided by the Bromley Design Review Panel.

¹² Details available here: <https://historicengland.org.uk/services-skills/our-planning-services/charter/our-pre-application-advisory-service/>

¹³ Details available here: <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

3. Character Appraisal - Understanding Bromley

Historical Development

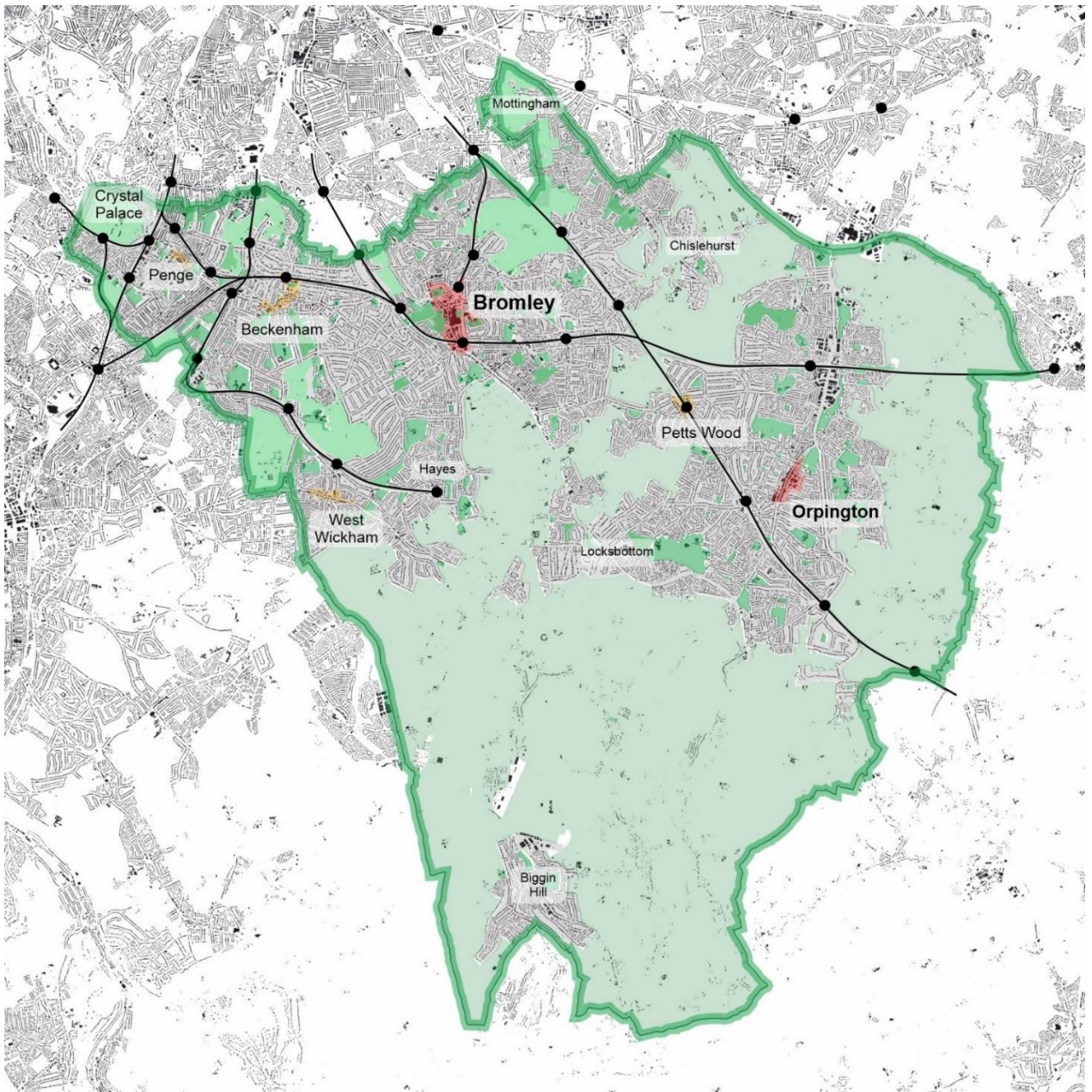
- 3.1. Bromley's historical development has played an important part in establishing its character. Bromley has a very strong architectural heritage which is reflected in several designated conservation areas across the borough which include a number of listed and locally listed buildings.
- 3.2. Bromley was a notable market town in the 13th Century, located on a major coaching route to London. The town developed around the marketplace, located at today's Market Square, and grew along the old London to Hastings turnpike. The market town on high ground above the valley of the River Ravensbourne benefited from pleasant views and healthy country air. Early maps show buildings grouped around the marketplace and the High Street. Up to the middle of the 19th Century the town extended from Bromley College in the north, to Tweed Cottage, next to Aberdeen Buildings, in the south, with estate gardens abutting sections of the High Street. Until the coming of the railway in 1858, little changed. The arrival of the railway and suburban expansion of London further encouraged growth as residential development radiated out from the historic town centre.
- 3.3. The commercial success of Bromley Town Centre altered the character of Bromley as a market town. The Glades Shopping Centre was completed in 1991 and the High Street was pedestrianised in the early 1990s to accommodate the popularity of Bromley as a commercial centre. Pedestrianisation of the High Street was facilitated by Kentish Way which was constructed in the early 1990s to bypass the town centre forming a continuation of the A21. The creation of Kentish Way and the Glades Shopping Centre were significant interventions in the evolution of Bromley Town Centre influencing its present-day character.
- 3.4. Beckenham has a long history as a village and the location of several notable country seats. Its transition to a town, and then to a suburb have wrought enormous changes in its built fabric that largely define its character today. The introduction of the railway saw Beckenham develop from a small village into a town on the edge of suburbia. The period of greatest growth and change, from 1860 to 1890, swept away most of the timber framed houses that had characterised the village and replaced them with architecture representative of Victorian urban life.
- 3.5. Development before the First World War in the Shortlands and Langley area was prompted by the railway, spreading from Beckenham south around Wickham Road and east around Bromley Road (A222) towards Shortlands Village.
- 3.6. To the west of the borough much of the Clock House, Elmers End and Eden Park area developed during the interwar suburban London expansion when growth, closely linked to the development of the railways, occurred around existing settlements. Clock House developed around the station and along the main route between Penge and Beckenham; Elmers End grew from an earlier settlement around the green; Eden Park grew out from the station as commuter development spread southeast.

- 3.7. The origins of West Wickham and Coney Hall go back to the Roman period, with a Roman Road lying beneath the two communities, and to the major estate of Wickham Court. The 20th Century growth was brought about by the sale of large estates and the electrification of the railway and comprises predominantly of larger semi-detached and detached dwellings.
- 3.8. To the far northwest of the borough, closely packed urban development occurred rapidly from the same time as the Great Exhibition in 1851. The Crystal Palace building was moved to the northwest of the Borough after the exhibition, and the area subsequently became known as Crystal Palace. The larger Victorian residential development around Crystal Palace Park spread downhill into Penge and Anerley and smaller workers' homes.
- 3.9. Development in the Bromley Common area occurred in the Victorian era along the Common with later development spreading east and south. By the 1850s, the former open frontages of the Common were lined with spacious semi-detached villas. This remains a mixed area interspersed with large areas of open land with Green Belt designation.
- 3.10. The Ravensbourne, Plaistow and Sundridge area grew when development before the First World War spread north from Bromley Town Centre along London Road and College Road and around Sundridge Park Station. At this time large detached Victorian Villas were built, to the west of London Road on the brow of the hill into Shortlands Valley, as well as narrower streets of tightly packed terraced houses.
- 3.11. Petts Wood developed during the late 1920s and 1930s, inspired by the Garden City movement. Station Square was laid out in 1928, and the retail centre developed around the station. Development first began on the east side of Petts Wood and spread to the west side once the station was established.
- 3.12. Chislehurst's present form derived from a number of physical and historical forces. Its topography is of long valleys and steep banks with a raised plateau at its centre. Upon this plateau are the commons around which a scattered village settlement developed, surrounded for most of its history by large country estates and densely wooded valleys. A network of settlements and open areas recognisable today formed around Chislehurst Common and the various routes crossing it.
- 3.13. With the arrival of the railway in 1865 the area became accessible and fashionable with London businesspeople and characterised by the Arts and Crafts Movement of the late nineteenth and early 20th Century. This saw large homes developed on spacious parcels of land within established woodland, accessed by winding rural lanes.
- 3.14. Orpington, in the east of the borough, has a long history dating back to the Stone Age. The Orpington Priory and Broomhill conservation areas are distinct areas of architectural heritage. The opening of Orpington Station in 1868 brought early development to the Crofton and Broom Hill areas. From its village origins the expansion of the railway station and residential development led to significant growth throughout the 19th and early 20th Century.
- 3.15. The River Cray has historically been the focus for the Cray Valley, St Paul's Cray and St Mary Cray area. Roman Baths (a Scheduled Monument) were discovered at Poverest Road and there is evidence that the area has been inhabited since at least the Middle Stone Age. Older buildings date back to a period of expansion in the 19th and early 20th Century related to the paper mill industry and the arrival of the railway.

There are a number of listed timber framed buildings which date from the 16th Century. The settlement, running south, followed the course of the river, from Main Road, St Paul's Cray, along High Street St Mary Cray.

- 3.16. The Orpington Bypass (Cray Avenue) was developed in the 1920s running north south, parallel to the River Cray and St Mary Cray High Street. Subsequent interwar housing clustered along St Mary Cray, High Street, south of St Mary Cray Station and along Cray Avenue stretching north to St Paul's Cray.
- 3.17. In the 19th Century Biggin Hill at the southern tip of the borough comprised of just a handful of cottages and public houses along a ridge of land with farmland in the valleys, similar to other settlements in the area. In the late 19th and early 20th Century plots of farmland were sold off and occupied by summerhouses and bungalows along the ridge.
- 3.18. Biggin Hill Airport opened in 1917 and was used as an RAF base until 1974. It was during the period up to, during and for a decade after World War II that the extent of residential land, which had spread into the valleys, was set within tight Green Belt controls in the mid-1950s. This prevented merging with the developing London suburbs to the north.
- 3.19. Darwin, to the south of the borough features residential development clustered around historic settlements along and at junctions of rural roads. Such development took place in the 19th and 20th Century and during the interwar period, it was supplemented by small scale social housing provision in and north of Downe Village and short stretches along Leaves Green Road, Cudham Lane North and Single Street. The growth was halted abruptly by the introduction of tight Green Belt controls in the mid-1950s.

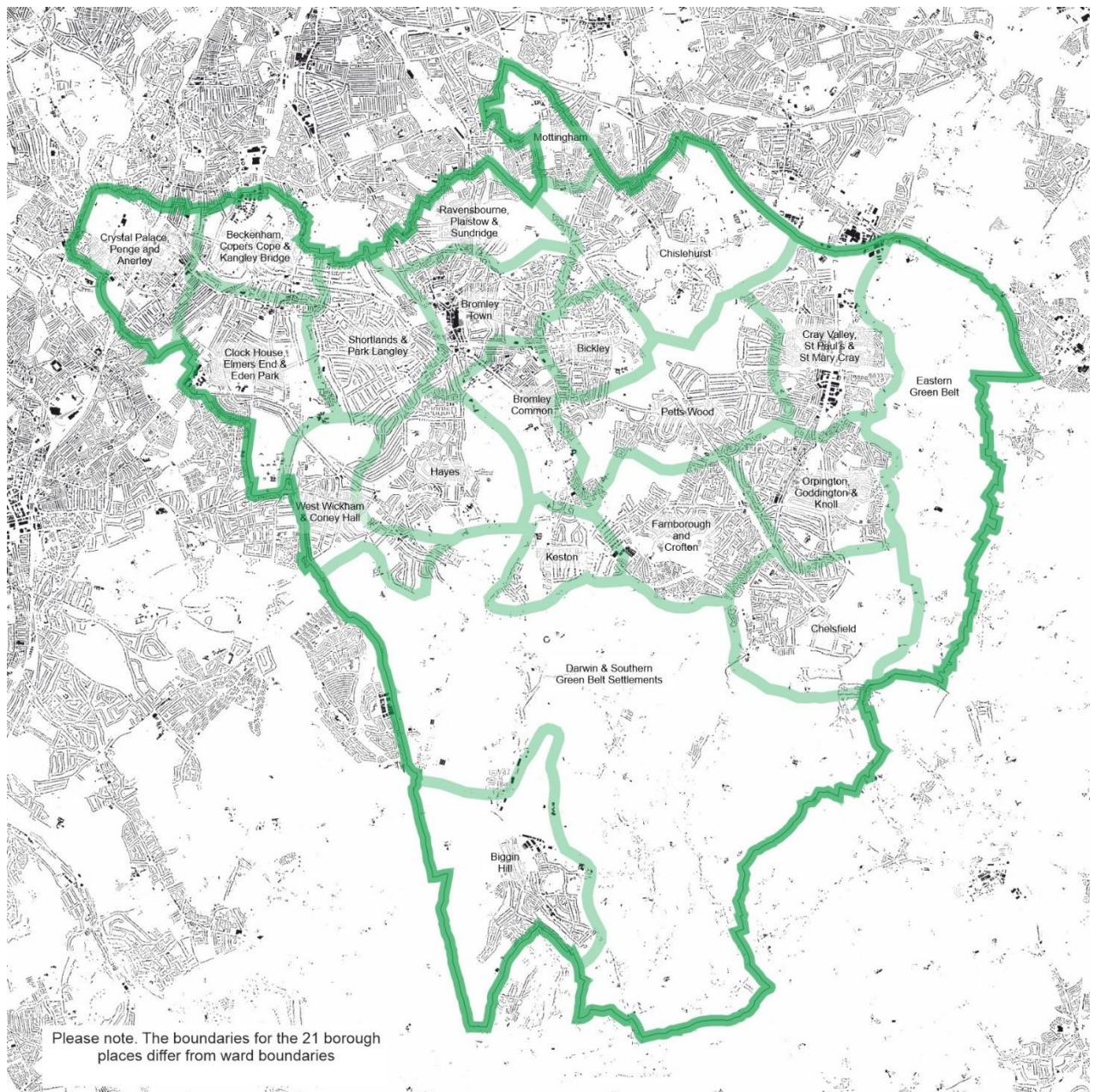
Figure 2 – borough context diagram



Bromley Today

- 3.20. Bromley is the largest borough in London covering an area of 64 sq. miles (150 sq. kilometres). Open countryside protected by the Green Belt makes up over half the borough with the majority of population concentrated in the northern part of the borough. Bromley's distinctive character arises from its protected countryside, parks, playing fields and woodlands. Tree lined roads and avenues with characterful houses and gardens are distinctive features of many of the borough's residential areas.
- 3.21. The built environment is varied and includes fairly high density Victorian and Edwardian residential areas, more spacious interwar suburban developments and the remnants of former large country estates exemplified by Sundridge Park and Holwood House.
- 3.22. Bromley has one of the largest economies of London boroughs outside the Central Activities Zone. Bromley Town Ward is the main location for the borough's office-based businesses, with approximately 132,000sqm of floorspace, almost half of the total office floorspace in the borough. Orpington, which benefits from close links with the M25, has the next largest concentration with approximately 22,000sqm. The remainder is mainly distributed amongst the borough's District Centres. There are three designated Office Clusters in the borough, at Crayfield Business Park (Cray Business Corridor), Knoll Rise (Orpington Town Centre) and Masons Hill (Bromley Town).
- 3.23. Industry and warehousing are important elements of the local economy. There are approximately 120 hectares of land in industrial or warehousing use, the majority being concentrated within the Business Areas in the Cray Business Corridor, Lower Sydenham (Kangley Bridge Road), Elmers End and Biggin Hill. St Mary Cray is the largest of the areas with just under 40 hectares used for light industry or warehousing; this area is one of two designated Strategic Industrial Locations (SIL) in the borough alongside the Foots Cray Business Area. In addition there are 12 designated Locally Significant Industrial Sites (LSIS) which include sites in Penge, Lower Sydenham, Elmers End, Bromley North, Bromley Common, Keston, and Biggin Hill.
- 3.24. The scale of the borough is such that it comprises of a wide range of places and communities; urban, sub-urban and rural. In order to effectively plan and manage future change it is important to understand the distinctive character and identity of each of the individual borough 'places', the age profile of the local community and the need for all forms of transport.
- 3.25. There are 21 borough places which reflect work first undertaken in 2011 to inform the development of the Local Plan. The borough is not comprised of rigidly delineated areas (e.g. ward boundaries) and hence the borough 'places' deliberately overlap, acknowledging the gradual transition from one place to another. In this respect they differ from wards, which are defined for electoral purposes, and whose sharp boundaries may cut through places and communities. The loose boundaries of the borough 'places' provide a basis on which to inform more detailed character appraisal assessments.

Figure 3 - Borough 'Places' map¹⁴



¹⁴ Please note that the Borough 'Places' do not follow ward boundaries

- 3.26. There are currently 47 designated Conservation Areas in Bromley, each designated because of its special architectural or historic interest. Specific SPD guidance for individual Conservation Areas has been produced to protect character and appearance and to ensure that change is managed in a sensitive way. There are also 13 Areas of Special Residential Character (ASRCs) – areas where there is a well-established, distinctive, coherent, and readily identifiable architectural character. Development proposals in these areas are required to respect, enhance, and strengthen their special and distinctive qualities.
- 3.27. There are a number of important archaeological sites in Bromley ranging from Crofton Roman Villa in Orpington to the remains of a moated Tudor mansion in Chislehurst; some of these sites are Scheduled Monuments. The Local Plan (policy 46) identifies a number of areas which may have important archaeological remains surviving. Historic England has recently reviewed Bromley’s archaeological priority areas; this review will be a relevant material consideration for planning applications within the areas¹⁵. The London Plan policy HC1 will also be relevant to any development proposals within these areas.

Borough Places

Beckenham, Copers Cope & Kangley Bridge

- 3.28. Beckenham is the third largest town centre within the borough and is a designated District Centre. The High Street is a significant retail centre comprising of a wide variety of independent shops and restaurants. Beckenham has an urban village feel, making it unique compared to other nearby towns.
- 3.29. The majority of dwellings in Beckenham are Victorian with some 1940s and 1950s flats and houses. During the latter part of the 20th Century a significant number of Victorian villas were converted or replaced by modern flatted blocks or housing. Several conservation areas and ASRCs have been established to help preserve and enhance the historic character and appearance of the area.
- 3.30. There are a variety of historic listed buildings in Beckenham, these include St. Georges Parish Church, Odeon Cinema and Beckenham Public Hall. Public Houses such as The George Inn and The Coach and Horses also have historic significance.
- 3.31. The majority of green space is in the north of the area where there are a number of sports fields, park and allotments. Much of the land is designated as Metropolitan Open Land (MOL) and forms part of the South East London Green Chain; there is limited access to green space in other parts of the area, particularly to the southeast. The River Beck, a tributary to the River Ravensbourne, cuts through the area, much of the central and northern part of the watercourse flows through protected open space.
- 3.32. Lower Sydenham is a designated LSIS, with a significant number of light industrial units covering a large area. Land to the east of the LSIS has recently been redeveloped into flatted residential developments.

Bickley

- 3.33. Bickley is a predominantly residential suburban area characterised by mainly detached dwellings. Unlike other parts of the borough the area does not have a clearly defined

¹⁵ Further information is available on the ‘Archaeology in Bromley’ webpage, available from: <https://www.bromley.gov.uk/local-history-heritage/archaeology-bromley>

centre. Bickley Station and Chislehurst Station are widely used by commuters, and both provide good links to London and Kent.

- 3.34. The Bickley Conservation Area comprises of around 90 mainly residential properties; these tend to be large dwellings on spacious plots, it also includes St. George's Church built in 1864. There are good examples of buildings built during the Arts and Crafts Movement, a traditional style that adds to the distinctive characteristics of the area and it is a style that has been mirrored in the design of modern housing throughout Bickley. The Mavelstone Road Conservation Area has a strong representation of the Arts and Crafts Movement in its style of architecture. There is also a significant ASRC of spacious interwar residential development.
- 3.35. Whilst public open space in Bickley is limited, there are large gardens associated with well-spaced properties. The more densely populated area to the south borders Whitehall Recreational Ground and Jubilee Country Park, on the edge of the Green Belt.
- 3.36. The area includes some commercial uses, particularly industrial units and offices. The Waldo Road area is a designated LSIS. Some smaller, older business sites have been redeveloped for residential use.

Biggin Hill

- 3.37. Biggin Hill's distinctive hilltop and valley character arises from its separation from the suburban spread of London, lying some 4 miles south of Keston Mark, in open countryside designated as Green Belt. The presence of the airport also gives a specific identity to the area which is a designated LSIS
- 3.38. The airport was formerly an RAF military airfield; its use by the RAF for flying ceased in 1959, after which the runways were used for civil aviation. Military use of the ground facilities ceased in 1992. The Biggin Hill RAF Conservation Area includes 14 listed structures, a number of which are currently included on Historic England's Heritage at Risk Register.
- 3.39. The wider area comprises of a patchwork of housing types following the piecemeal development of individually owned plots creating a wide range of styles and designs from the second half of the 20th Century. With the exception of the Green Belt areas, Biggin Hill has the highest proportion of detached houses and bungalows in the borough.
- 3.40. The generally sloping nature of the Biggin Hill landscape and historic incremental development, without large scale planned development, has meant very limited social housing development. An exception to the small-scale plot development is the Leavesden estate to the north of the town comprising 130 dwellings and a village green. Whilst the town is bounded by Green Belt there is relatively little open space within the built-up area, flat recreational space is limited

Bromley Common

- 3.41. Bromley Common is one of five 'renewal areas' within the borough and forms part of the A21 corridor, a major radial route into London and an important transition area between Bromley Town Centre and the more rural and residential areas to the south of the borough.

- 3.42. Parts of Bromley Common are characterised by large areas of Green Belt open land, although a considerable amount of Green Belt land has been lost in recent years. The older residential areas around Chatterton Road are more densely populated. Bromley Common Conservation area comprises 1850s semi-detached Victorian villas which face the common. The difference between the Bromley Common villas and the much less spacious red brick later suburbs constructed to meet the demands of the railway commuters is marked.
- 3.43. The Bromley, Hayes and Keston Commons Conservation Area is a group of conservation areas to the south. There are six conservation areas linked by common land creating a rural feel; the majority of buildings contribute to the unique characteristics of the area. Chatterton Village is a distinctive centre with a variety of independent retailers, small industrial units, restaurants and a pub.
- 3.44. The Turpington Lane Estate, formerly a Council housing estate, was built in the late 1950s / early 1960s and comprises houses and flats, including Bonnington Tower. The area has experienced significant recent change including the 'Trinity Village' housing development on former Green Belt land, and further north, the changing nature of Homesdale Road from commercial offices and houses to flatted development. Two tributaries to the River Ravensbourne flow through the north-west and east of the area.
- 3.45. Bromley Common has three designated LSISs - Enterprise House (Hastings Road), The Beechwood Centre (Lower Gravel Road), and Bencewell Business Park (Oakley Road) - containing a range of industrial, and business uses.

Bromley Town Centre

- 3.46. Bromley Town Centre is the largest town centre in the borough and is a designated Metropolitan Town Centre and Opportunity Area. The town centre is built on an elevated plateau, with the oldest historic part situated to the north, the High Street follows a sloping ridge down to Bromley South Station and the area beyond which sits on lower topography.
- 3.47. The town centre offers a range of retail, leisure, cultural, office and residential provision including The Glades Shopping Centre, the Churchill Theatre, a pedestrianised High Street area and Bromley North Village.
- 3.48. The central High Street area extends from Elmfield Road in the south to Market Square in the north and has a varied character, some buildings have survived from the early 19th Century; these tend to be modest two-storey structures with traditional detailing. The remaining buildings are a mixture of late 19th Century to early 20th Century buildings. The former tend to be two-to-three-storeys in height with narrow frontages following traditional building plots with well detailed commercial facades in brick.
- 3.49. The western side of the High Street contains large plots with post-war modernist buildings. The Glades Shopping Centre built in the early 1990s is a substantial structure contrasting with the finer grain surroundings, the large footprint contributes to east-west severance within the town centre.
- 3.50. The northern High Street area runs from Market Square in the south to Bromley and Sheppard's Colleges in the north, this section is open to traffic and is a main vehicle thoroughfare through the town centre. The majority of buildings date from the late 19th Century; typically three-to-four-storeys in height with narrow frontages. A number of earlier buildings survive and are much lower timber framed two-storey structures.

- 3.51. Market Square links the northern and southern High street character areas and has an intimate character; buildings are typically two-to-three-storeys in height including the prominent 1930s neo-Tudor building in the centre. The square is framed by several locally listed buildings of architectural merit.
- 3.52. There are distinctive Victorian terraced dwellings in Bromley North Village and in the vicinity of Bromley North Station, which stretch north and northeast and incorporate a small business area at Farwig Lane. The Bromley North character area contains a number of important listed and locally listed landmark buildings including Bromley North Station, former Town Hall, former Public Library building and Bromley Baptist Church. Many of the buildings form part of a civic node, the original Victorian and Georgian architecture is attractively detailed and carefully executed, unfortunately many of the mid-late 20th Century additions have not been to the same standard.
- 3.53. A distinctive feature of the town centre is an unusually good provision of green open space. Church House Gardens links the High Street with Martin's Hill recreation ground, both of which slope down to Queensmead recreation ground in Shortlands. Queens Gardens lie to the rear of the Glades Shopping Centre and the grounds of the Bromley Palace are located on the Civic Centre site to the east.
- 3.54. There is a concentration of flatted developments to the north and dwellings behind the High Street sloping down to Bromley South Station and also Shortlands in the valley to the west. To the north of the town centre lies the Farwig Lane industrial area which is a designated LSIS.
- 3.55. Beyond the immediate town centre environment there is a dramatic contrast between the town centre and the residential suburban setting, east of Kentish Way (A21) stretching towards Bickley. The River Ravensbourne runs just west of the town centre, substantially through open space.

Chelsfield

- 3.56. Located to the east of the borough the character of the area is reflected by its open countryside origins and the introduction of tight Green Belt controls. The area includes Chelsfield Park; a private estate built in the 1920s lying southeast of Chelsfield Station comprising of large, detached dwellings with spacious gardens.
- 3.57. Chelsfield Village and Chelsfield Park remain relatively untouched from suburban growth, predominantly comprising of 1940s semi-detached and detached dwellings. Development includes areas of social housing; these properties typically have good sized gardens and off-street parking.
- 3.58. Chelsfield Village, separated by a swathe of Green Belt has retained much of its original character featuring smaller village properties and bungalows. As a designated Conservation Area, it includes several historic and statutory listed buildings. The green and recreation ground are located in the heart of the area and are valued by local residents. The Green Belt is used mainly for arable farming, market gardening and horticulture as well as a golf course and school playing fields.

Chislehurst

- 3.59. Chislehurst is a typically suburban area with significant green space and recreational facilities; the majority of dwellings tend to be detached or semi-detached houses. A

large part of the area falls within Chislehurst Conservation Area which incorporates diverse styles and forms of development and open space. Parts of Chislehurst are more rural in character.

- 3.60. The Conservation Area is the largest in the borough which comprises predominantly residential development in the west, agricultural and rural land in the east, with the intervening portions incorporating extensive Commons and open space, nodes of retail, service and community facilities, and residential areas.
- 3.61. Local sites of interest include Chislehurst Caves, Scadbury Manor (which is a Scheduled Monument) and Camden Place, a residence of Napoleon III in the 1870s which is now a Grade I listed building.
- 3.62. The characterful nature of Chislehurst has maintained pressure for residential development throughout the 20th Century and beyond. The degree to which successive phases of development have complemented or eroded earlier phases is variable, but a strong overall consistency of character has been sustained.

Clock House, Elmers End & Eden Park

- 3.63. Situated in the northwest of the borough, these inter war suburbs merged together and as a result have many characteristics in common. The area consists predominantly of two-storey terraced and semi-detached properties, most benefit from easy access to local amenities and recreation grounds. Elmers End includes a designated LSIS.
- 3.64. Some suburban roads have retained their particular residential styles and spatial qualities and have Conservation Area status or have been identified as an ASRC. The area merges into Langley Park to the east.
- 3.65. The area benefits from several large playing fields, recreation grounds as well as allotments and significant areas of private open space around the Royal Bethlem Hospital. The hospital site and stretches of open space along the route of the Beck are designated Sites of Importance for Nature Conservation (SINCs). Both the Beck and Chaffinch Brook run through the area.

Cray Valley, St Paul's & St Mary Cray

- 3.66. Cray Valley is bounded by Chislehurst and Petts Wood to the west and Orpington to the south. The Orpington bypass (Cray Avenue), developed in the 1920s, runs north south parallel to the River Cray and St Mary Cray High Street. Subsequent interwar housing, including suburban terraces, semi-detached houses and bungalows are clustered along St Mary Cray, High Street, south of St Mary Cray Station and along Cray Avenue stretching north to St Paul's Cray.
- 3.67. St Mary Cray is the largest industrial/employment area in the borough with just under 40 hectares used for light industry or warehousing. The main industrial activity clusters north and south of St Mary Cray Station (including Nugent Shopping Park) and extends north through St Paul's Cray; further north at Ruxley Corner, the business area links across the borough boundary into Foots Cray (in Bexley). These areas are designated SILs.
- 3.68. St Mary Cray and St Paul's Cray owe much of their character to the London County Council 'cottage estates' house building of the 1950s which developed rapidly in the London Green Belt. The social housing estates lie both east and west of the valley, north and south of the railway line, consisting predominantly of two storey houses and

maisonettes with small rear gardens. They were designed with some large areas of open space, school facilities and access to local shops. Additionally, there are some high-rise flatted blocks close to St Mary Cray High Street and Cotmandene Crescent.

- 3.69. The character of St Paul's Cray estate, to the west, is little changed other than extensions to privately owned homes and 1980s cul-de-sac infill development. However, areas of the St Mary Cray estates to the east have seen wholesale redevelopment providing social housing at higher densities.
- 3.70. The Cray Valley Renewal Area comprises two adjacent identified borough places; 'Cray Valley, St Paul's Cray & St Mary Cray' and 'Orpington, Goddington and Knoll'. The Cray Valley Renewal Area includes areas identified by the Mayor as Areas for Regeneration, in the vicinities of Cotmandene Crescent, Ramsden and east of St Mary Cray High Street.
- 3.71. The River Cray runs through open spaces, including recreation grounds, Site of Special Scientific Interest (SSSI) and SINC designations, as well as residential, commercial and industrial areas and two Conservation Areas. The River Cray remains open and accessible in places although the network is halted as parts are culverted and inaccessible for nature and people.
- 3.72. Towards the east of the valley the Crays are bordered by a significant swathe of Green Belt comprising of farmland, parkland and golf courses. There are sites of nature conservation interest and a SSSI at Ruxley. Gypsy and Traveller sites border the area at Star Lane and Old Maidstone Road.

Crystal Palace, Penge, and Anerley

- 3.73. This area is dominated by the historic Grade II* Crystal Palace Park. Designated as MOL it is archaeologically significant and includes a significant Site of Interest for Nature Conservation and the listed Dinosaur sculptures. Conservation Areas protect a range of historic development, including the large Victorian villas, smaller workers' cottages (Alexandra Cottages), and almshouses (Watermans Square) and the Park itself.
- 3.74. The majority of large Victorian properties have been converted into flats, resulting in the area being densely populated. Parts of Penge and Anerley also include distinct social housing estate developments which have been developed at some of the highest densities in the borough. The historic reliance upon local facilities has produced a concentrated network of local parades and centres making it difficult to draw clear boundaries between neighbouring communities within and beyond the borough boundary. The tight urban development is interspersed by only small recreation grounds, allotments and school playing fields; this northwest area of the borough lacks publicly accessible green open space.
- 3.75. Crystal Palace, Penge and Anerley is one of five 'renewal areas' within the borough identified by the Council. This area shares a District Centre boundary with Croydon, as well as boundaries with Lambeth, Southwark and Lewisham. Penge has two designated LSISs; Oakfield Road and Franklin Industrial Centre (Franklin Road) incorporating industrial and retail warehousing units.

Darwin & Southern Green Belt Settlements

- 3.76. Darwin is the most southerly, highest, and most rural area in the borough. There is a rich legacy of historic and built heritage and a sense of tranquillity and remoteness.

The character of the area reflects its topography and historic past. Dry chalk valleys run north through the area, separated by a plateau formed from clay with flints, producing a range of distinctive ridges.

- 3.77. Pratts Bottom is a small hamlet which straddles the boundary with Sevenoaks, comprising of mainly detached dwellings. The village has a green, and local amenities, and contains two ASRCs.
- 3.78. Within the open countryside lie the historic villages in Downe and Cudham and the hamlet of Nash which are designated Conservation Areas. Since the mid-20th Century development has been limited. The majority of dwellings in the area are detached houses or bungalows with generous sized gardens and/or paddocks. The area is sparsely populated and includes farmland and significant recreational open spaces including High Elms Country Park, and Hayes and Keston Commons. There is an extensive but disjointed network of public rights of way with promoted circular walks.
- 3.79. Designated as Green Belt this is one of London's richest areas for wildlife. Across the chalk downlands, heathland and ancient woodlands there are SSSIs, local nature reserves, SINCs and part of the designated Kent Downs Area of Outstanding Natural Beauty (AONB).

Eastern Green Belt

- 3.80. This rural settlement is a remnant of a post medieval landscape sandwiched between the Cray Valley to the east, including St Mary Cray and St Paul's Cray and the Darent Valley including Swanley (Sevenoaks) to the west. The current borough boundary is defined by the 1,000-year-old parish boundary and marked by significant individual trees; the railway line and A20 also create significant physical barriers.
- 3.81. Unlike the southern area of the Green Belt there are no distinct settlements over a great swathe of Green Belt to the east of the borough. Instead, farmhouses, workers cottages and small holdings are scattered across the area along the rural roads. Many of the buildings are statutory or locally listed and the St Paul's Cray conservation area stretches into this Green Belt area. There are some mid-20th Century houses at Hockenden and Kelvington and some semi-detached houses along Old Maidstone Road. There are also several sites occupied by mobile homes and caravans including Gypsy and Travellers Sites.
- 3.82. St Paul's Cray Country Park provides the main recreational space serving the nearby suburban population. There is a nature reserve at The Warren and a number of SINCs which are mainly ancient semi-natural woodlands.
- 3.83. The southern part of the area is the most heavily wooded, part of which falls within the Kent Downs AONB.

Farnborough & Crofton

- 3.84. Farnborough and Crofton is a suburban area comprising of mainly semi-detached and detached housing. There are several listed buildings in Farnborough Village which is a designated Conservation Area.
- 3.85. During the interwar years most of the intervening farmland was developed with low density housing including single storey bungalows and two storey semi-detached houses. Farnborough Park Conservation Area and part of the Keston Park Conservation Area are within the locality. They comprise larger detached homes and

there are some examples of buildings from the Arts and Crafts and Garden City Movements. The area includes social housing within the Darrick Wood Estate in Broadwater Gardens which is a typical example of suburban housing built in the 1980s.

- 3.86. Almost half of the area is green space, it includes Darrick, Sparrow and Newstead Woods and also a large area of Green Belt to the south. There is a wooded appearance to the area due to the low density and its secluded private estates. A branch of the River Ravensbourne also runs northwards passing Locksbottom.

Hayes

- 3.87. Hayes, whilst being a suburban residential area, owes much of its character to its historic past and its significant areas of open land, with significant areas of Green Belt, including commons and farmland. This Green Belt extends to within half a mile of Bromley Town Centre, while in the opposite direction, it leads towards the Kent countryside.
- 3.88. The bulk of the developable area was built during the interwar period and has been confined to its current area due to it being bounded on two sides by Green Belt. Hayes Village incorporates a number of historic buildings typical of a Kentish village, listed buildings include the Church of St. Mary the Virgin, St. Mary Cottages and Hayes Library (The Old Rectory). There is a Conservation Area covering much of the heart of the village.
- 3.89. Away from the village, are various other listed buildings, many of them standing within or on the edge of Hayes Common, with some pockets of historic interest lying within the Bromley, Hayes and Keston Commons Conservation Area. Hayes Common also benefits from being a SINC, within which is an SSSI.
- 3.90. The housing comprises mainly semi-detached and detached family dwellings of quite low density with private gardens. The Warren Wood Estate is a designated ASRC. The area includes some pockets of social housing. The distinctive Hayesford Park Estate includes houses and flats that won an architectural award when built in the 1960s. It includes a range of shops and facilities. The Pickhurst Rise Estate, to the west, includes four long avenues of interwar terraced and semi-detached properties stretching down to West Wickham.
- 3.91. A substantial proportion of land is Green Belt resulting in an abundance of commons, playing fields and recreation grounds. Blackheath and Bromley Harriers Athletics Club, Bromley Football Club as well as other clubs for rugby, cricket, tennis, and bowls are located in the area. Additionally, allotment gardens and parks are interspersed with housing.

Keston

- 3.92. There are three types of residential area that make up Keston: Keston Park and part of Farnborough Park, where there are very generously spaced detached houses in gated communities; north of Croydon Road is an interwar suburban area of mainly semi-detached houses; and the older Keston Village lies adjacent to Hayes Common. These are interspersed with extensive stretches of open land all protected by Green Belt designation and consequently there is good access to parkland and open countryside including Keston Common and Padmall Wood. Much of the open land is covered by SINCS and Keston Common is a SSSI. The area also has two designated LSISs; Kimberley Business Park, Leaves Green and Higham Hill Farm.

- 3.93. There are three conservation areas locally: the Keston and Farnborough Park Conservation Areas have similar characteristics of openness and spaciousness. There is not one particular architectural style, although there are examples from the Arts and Crafts Movement. There has been pressure for development in these areas and some of their open characteristics have been lost as a result.
- 3.94. The Keston Village Conservation Area covers the historic village and windmill, although the parish church, pre-Roman and Roman historic features lie to the south in the Darwin and Green Belt Settlements area. Part of the residential area around Hollydale Recreation Ground is designated as an ASRC.

Mottingham

- 3.95. Mottingham to the north of the borough stretches over the borough boundary shared with Lewisham to the west and Greenwich to the east. The A20 is a significant barrier to movement to the north; it cuts off both Mottingham Station and Eltham Palace in the borough of Greenwich.
- 3.96. The Bromley element of the area includes large areas of open space protected as Metropolitan Open Land. Mottingham Village and the area around Mottingham Hall was established during the Victorian period and includes several listed buildings. Interwar suburban housing spread from these centres, it includes two former council housing estates, a predominate feature of the area. Mottingham contains a much larger percentage of social rented accommodation relative to the rest of the borough.
- 3.97. The 1930s London County Council (LCC) Mottingham Estate was built with shops and local facilities at its centre, comprising of two storey family housing with private gardens; it is similar in character to the adjoining LCC estates in Lewisham and Greenwich. These estates, which still retain the original sense of scale and some of the existing shared social infrastructure, feature in the Mayor's 'Areas of regeneration' as being among the most deprived areas in the Borough.
- 3.98. Mottingham is one of five 'renewal areas' within the borough. Whilst there are areas of private, relatively spacious, interwar semi-detached dwellings, the majority of Mottingham has been developed at high densities.
- 3.99. There are significant areas of open space linking across borough boundaries. As well as being designated MOL they fall within the Green Chain – a linked series of open spaces stretching across southeast London.

Orpington, Goddington and Knoll

- 3.100. Orpington is the second largest town centre in the borough and is a designated Major Town Centre within London. The town centre is located within the Cray Valley with land rising to either side. The relationship of the town to the wider Green Belt countryside, and views to it, are important to the town's character and identity.
- 3.101. The town centre offers a range of retail, leisure, cultural, education, office and residential provision including the Walnuts Shopping Centre, Odeon cinema, library, leisure centre, Orpington College and a vibrant commercial high street including a street market held in Market Square.
- 3.102. The long linear High Street running north to south is characterised by two-to-three-storey buildings, predominantly narrow fronted shops with residential flats above.

These are punctuated by several larger buildings generally set on corners or other key sites. The northern end of the High Street has retained a village scale and form reflected in the street width and placement of buildings flush against the street frontage.

- 3.103. The Walnuts Shopping Centre built in the 1970s is an inward facing development forming part of a cluster of larger scale buildings on the eastern side of the High Street which create a barrier to east-west and north-south permeability. Buildings in this part of the town centre have larger floor plates and are of a greater scale and massing, typically stepping up in height to around four-to-five-storeys. Orpington College (11 storeys) is currently the tallest building in the town.
- 3.104. The Orpington Priory and Broomhill Conservation Areas are distinct areas which have particular architectural and historic interest. Orpington Priory Conservation Area includes the town's most significant concentration of listed buildings, located in the historic village centre. The house known as Barn Hawe (formerly Fern Lodge) dates from the 1770s and is Listed Grade II, as are the timber-framed outbuildings of The Priory. The Priory is Listed Grade II* and includes elements dating from the 13th Century with successive enlargements and changes, notably the timber-framed 16th Century extension. Priory Gardens is also Grade II listed.
- 3.105. The Knoll area is suburban and residential in nature, characterised by detached and semi-detached two storey properties; it includes the Knoll ASRC, a designated area encompassing Broxbourne Road, Dale Wood Road, Lynwood Grove and Mayfield Avenue. The area's distinctive character is defined by generous sized plots and a readily identifiable and coherent streetscene. Within the Knoll area, the Broomhill Conservation Area lies to the west of the Town Centre, centred on Broomhill Common. Crofton Roman Villa, a Scheduled Monument, is sited adjacent to 19th and 20th Century commercial and transport development at Orpington Station. Though well protected by the late 20th Century structure that encloses it, the Villa's impact on the wider public realm is minimal.
- 3.106. Aynscombe Angle to the north of the High Street is a notable grouping of terraced houses conceived and developed with a strong consistency in form and materials but with variations of detail. Incremental changes to the component buildings since their construction have generally been sympathetic to this consistency.
- 3.107. Housing typologies across Orpington are varied as a result of the town's growth over time. The majority of homes in Orpington are interwar semi-detached houses with sizable gardens which extend up to, and radiate out from, the town centre. Small greens and school playing fields are located within built up areas, with the eastern boundary defined by Green Belt. Orpington benefits from the open green space of Priory Gardens in the heart of the town, as well as Poverest Park and other incidental landscapes and parks nearby.
- 3.108. Goddington is an area with mainly detached dwellings which surround Goddington Park, an outcrop of Green Belt. Goddington House, located on the northeast corner of the park is a 19th Century Grade II listed building. Pockets of residential development built after Green Belt constraints were introduced are laid out at a higher density in a cul-de-sac style. A phased redevelopment of the Ramsden Estate, which comprised mainly of social housing, has created new homes and improvements to public spaces.

Petts Wood

- 3.109. Petts Wood is one of five District Centres in the borough, unusually split by the railway line; the retail centre which was developed around the station has a variety of independent retailers, restaurants and pubs.
- 3.110. The suburban residential development to the east, which was conceived and is maintained on the garden suburb principle, is predominantly Neo-Tudor with many Arts and Crafts Movement references. There are large, detached houses on spacious plots, and semi-detached two-storey houses and some detached bungalows. The majority of dwellings have generous rear gardens. The main development pressure comes from residential extensions and replacement houses which can alter the character and appearance of the locality.
- 3.111. The scale of the intact layout is recognised by the largest ASRC in the borough, within which, particularly fine examples of these styles can be found in the five designated Conservation Areas; Station Square, the Chenies, the Covert, the Thrifts and Chislehurst Road.
- 3.112. Development to the west is less linear with narrow roads and long crescents and is more closely spaced. There are some detached houses and clusters of bungalows, however, the 1930s style semi-detached house style predominates. Many chalet-style semi-detached dwellings have had roof extensions and bungalows have been demolished or extended to create two-storey houses.
- 3.113. A large number of mature trees in private gardens give the area its wooded character. Petts Wood is bounded by open space such as Sparrow Wood, Jubilee Country Park in the west and Petts Wood itself to the east. There are also a number of recreation grounds. The Kyd Brook is a mostly culverted watercourse running through the area.

Ravensbourne, Plaistow & Sundridge

- 3.114. Ravensbourne, Plaistow and Sundridge is one of the borough's designated 'renewal areas' comprising of a mixed area of housing around a large area of open space (Sundridge Park Golf Course) and served by local centres at Plaistow Lane and Burnt Ash Lane. The Bromley North branch railway line runs through the area with limited crossing points. Development west of the branch line is a complex mix of residential styles and ages. Wide avenues of large dwellings with substantial gardens are situated between Burnt Ash Lane and London Road. Burnt Ash Lane features interwar development in the form of semi-detached houses as well as the Burnt Ash Heights Estate constructed in the 1960s/70s which includes a 12-storey tower block alongside smaller scale flatted blocks of social housing.
- 3.115. The area includes the southern edge of the Downham Estate built by the London County Council (LCC) between the wars. The estate is characterised by terraced cottages laid out with small gardens and a range of public open spaces; it lies mostly in neighbouring Lewisham although some of the estate roads, primary school and Shaftesbury Park lie within Bromley.
- 3.116. Many of the pre-war dwellings on large plots have been redeveloped for flats and cul-de-sac housing developments, and since the 1980s there has been a marked change in character west of London Road, around Oaklands Road and Grassmere Road.
- 3.117. East of the railway line lies the Grade I Sundridge Park Mansion and golf course. There are two distinct residential areas next to the golf course; to the south (off Plaistow Lane) lie spacious roads of large, detached dwellings of a range of styles and

ages, the older pre-World War I group are within a designated Conservation Area. Towards the borough boundary lies 'Hall's Farm' estate. Comprising of interwar detached and semi-detached houses it is only accessible by a single road 'New Street Hill' which runs under the railway line. In addition to Sundridge Park golf course there are many open spaces, both public and private, including playing fields, parks, allotments, sports clubs, cemeteries and a covered reservoir.

Shortlands & Park Langley

- 3.118. This area covers the slopes between the River Beck to the west and the River Ravensbourne in the east. Early Beckenham suburbs, which include a number of listed and locally listed buildings, are characterised by large Victorian villas north and south of the railway line and sloping down from St Mary's Church, Shortlands, to more tightly packed development, including smaller cottages and terraced housing in Ravensbourne Valley around Shortlands Station. Development around Shortlands Station includes a range of houses and flats of various styles and ages, with local shops and services and a recreation ground at the heart of the community.
- 3.119. In contrast, the areas to the south, either side of Hayes Lane, feature wide roads which are almost exclusively residential including the Langley Park estate and roads around South Hill Road, much of which is designated Conservation Area or an ASRC. They are spaciouly laid out with substantial size detached and semi-detached dwellings with large front and rear gardens.
- 3.120. The formally laid out interwar estates remain substantially unaltered except along Westmoreland Road where there has been small scale redevelopment. By contrast the character of the pre-World War I development that spread out from Beckenham has changed significantly. Having become a desirable commuter suburb, many of the larger properties in significant grounds were redeveloped at high density for flats with parking and communal gardens, and tight cul-de-sac developments, particularly along The Avenue and Albemarle Road. The redevelopment of larger properties and the conversion of others has resulted in higher density with relatively little private space. The pressure for the redevelopment of the remaining older dwellings is likely to continue. Several areas of Edwardian and interwar development which are of a particular style and character are within designated Conservation Areas.
- 3.121. The site of the former GlaxoSmithKline pharmaceutical research facility to the east of South Eden Park Road has recently been redeveloped into a residential housing scheme providing 280 new homes designed in a traditional architectural style in keeping with the character of the area.
- 3.122. There are areas of open space to the southwest and northeast, comprising golf courses and sports grounds. Whilst properties generally have large private gardens, the majority of the area has limited access to public open space. Other than South Hill Park, public open spaces are located at the fringes; at Kelsey Park to the west and Shortlands recreation ground across the railway tracks.

West Wickham & Coney Hall

- 3.123. West Wickham is a District town centre; it is set on a ridge and shares some of the characteristics of Coney Hall which lies in the valley to the south, below the steep rise to Hayes and West Wickham Commons. The built-up part of Coney Hall has a distinct character, being almost wholly one 1930s estate with an obvious boundary and having a uniform suburban style projecting southwards into the Green Belt; it comprises smaller semi-detached properties, many of which were built as 2 bed homes but have

been subsequently extended. Whilst neither area has a Conservation Area, there are a number of statutory and locally listed buildings as well as a Scheduled Monument in the grounds of Coney Hall.

3.124. The area has good access to open space with designated Metropolitan Open Land to the north, including recreation grounds, numerous playing fields, SINC's and woodland. Much of the open space to the south is designated Green Belt, comprising woodlands, sports grounds along Addington Road (including 'Sparrows Den') and commons stretching into farmland. To the west lies 'The Beck' watercourse, limiting routes into Croydon.

4. Principles of Good Design

The role of planning

- 4.1. Good design is integral to good planning; thinking about urban design from the **start** of the **planning process** is key to achieving successful and sustainable development. Design now has a greater emphasis in national and regional planning policy than ever before in recognition that good design **adds value** (social, environmental, economic) – it is a prerequisite for planning approval and should no longer be seen as an ‘optional extra’.
- 4.2. Design is an important part of planning at every scale, from the materiality and detailing of individual buildings to the layout, use, scale, architecture and landscape of large-scale developments and wider spatial strategies and masterplans.
- 4.3. **Design quality** should be considered at each stage of the planning process (pre-application discussions, planning application submission, post-planning conditions, monitoring and review) and at every stage of the design process (development brief, context appraisal, conceptual ideas, design development, design review, implementation and delivery).
- 4.4. **Development Management** is fundamental in delivering planning policy objectives and safeguarding the design quality of individual proposals throughout the process. The Council will seek to take a **positive and proactive** role in managing development in order to achieve spatial/regeneration objectives and to encourage desired forms of development that meet wider strategic visions whilst resisting poorly conceived proposals and/or poor-quality design.
- 4.5. Planning and design is a multidisciplinary **collaborative process** particularly for larger complex schemes; the Council’s overarching aim is to ensure quality without constraining development. Enabling officers to inform and influence the design of development proposals early in the pre-application process can avoid the need for revisions at a later stage and minimise uncertainty and delay. The Council will aim to **lock-in quality** at an early stage; an additional layer of design scrutiny will be applied via independent design review in accordance with London Plan requirements.
- 4.6. The achievement of a successful outcome is a **shared responsibility** between the various professionals/disciplines involved, it is important that applicant’s, developers, and design teams consider themselves as participants within the wider development management process using their role responsibly and collaboratively in order design and deliver successful places.

The characteristics of successful places

- 4.7. There are some common **characteristics** that are identifiable in successful places. These characteristics are widely recognised and documented in several key publications by various leading authors, institutions and organisations. These characteristics relate to how we **use** and **experience** places.

4.8. The characteristics of successful places are listed below; these have remained valid and largely unchanged over the past 20 years.

By Design (DETR/CABE, 2000)

- **Character** – A place with its own identity.
- **Continuity and Enclosure** – A place where public and private spaces are clearly distinguished.
- **Quality of the Public Realm** – A place with attractive and successful outdoor areas.
- **Ease of Movement** – A place that is easy to get to and move through.
- **Legibility** – A place that has a clear image and is easy to understand.
- **Adaptability** – A place that can change easily.
- **Diversity** – A place with variety and choice.

National Planning Policy Framework (NPPF, 2021)

- A strong **sense of place**, sympathetic to **local character**
- Arrangement of **streets, spaces**, building types and materials
- Attractive as a result of **good architecture, layout and appropriate and effective landscaping**
- Provide for high quality **walking and cycling networks**, create places that are **safe, inclusive and accessible**
- **Function well** and add to the overall quality of the area
- **Sustainability and resilience**
- Appropriate amount and **mix** of development

4.9. The **National Design Guide (2021)** forms part of the Government's collection of planning practice guidance, the document identifies 10 characteristics of well-designed places listed below:

- **Context** – enhances the surroundings
- **Identity** – attractive and distinctive
- **Built form** – a coherent pattern of development
- **Movement** – accessible and easy to move around
- **Nature** – enhanced and optimised
- **Public spaces** – safe, sociable and inclusive
- **Uses** – mixed and integrated
- **Homes and buildings** – functional, healthy and sustainable
- **Resources** – efficient and resilient
- **Lifespan** – made to last

Figure 4 - National Design Guide: 10 characteristics of a well-designed place



4.10. The characteristics identified in the key publications referenced above form part of the evidence base upon which the Council’s own design principles are based.

Approach

4.11. Urban design draws together the many stands of **placemaking** (social, environmental and economic) with the aim of creating vibrant places with **character** and **identity**. The design of spaces and places affect us all to varying degrees, decisions made by the Council must therefore be carefully considered on many different levels.

4.12. General (higher level) strategies are often ‘loose’/open to interpretation and their implications can be obscure, while specific objectives/goals (lower level) can be too specific and ‘fixed’. The connection between the two may not always align, and furthermore, prescribing overly specific rigid solutions can result in some unwanted/unintended consequences such as creating/shifting problems elsewhere.

4.13. In order to avoid this, the Council has developed 6 overarching interrelated **design principles** (Contextual, Responsive, Connected, Inclusive, Healthy, and Sustainable) which inform the more specific guidance outlined in Section 5 – ensuring that the detailed and measurable design objectives (‘SPD guidance notes’) relate to, and are underpinned by, the principles.

Design-led approach

- 4.14. In recent years there has been a policy shift from a previous quantitative numerical approach (density matrix) to a **design-led** (character assessment) approach to establishing appropriate density and site capacity with a focus on **context** and **character** – as set out in the London Plan. The Council strongly supports this approach.
- 4.15. The appropriate layout and density for a site should derive from a creative **design-led approach** which responds to the particular **characteristics** of a site, its surroundings and the needs of existing and future residents. All development must make the best use of land by following a design-led approach that **optimises** the capacity of sites, including site allocations.
- 4.16. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site, i.e. optimise (responding to the qualities of a place) as opposed to maximise (over development of a plot for economic gain). It is important to recognise that density should be an **outcome not a starting point**, the focus should be on **quality of place** over quantum of development.

Assessing 'good design'

- 4.17. In addition to the six overarching design principles set out below (see paragraph 4.19), the Council will assess development proposals against three broad design considerations; **connection** (in relation to form and layout), **contribution** (in relation to visual and functional quality), and **clarity** (in relation to the quality of user experience). These considerations should form the **starting point** for architects and designers providing a basic framework to inform design thinking.

Connection – Form and Layout

- How well does the scheme **respond** with and **relate** to its setting? (local, existing, emerging context)
- How well does it **stitch** into the existing urban fabric? (connectivity, permeability, movement)
- **Relationship** with neighbouring buildings/surrounding context (height, scale and massing)
- Suitability of **architectural approach**; building typologies (character and identity)
- **Landscape strategy** (quality and quantity of amenity spaces and public realm)
- Design-led approach; emphasis on **place** over quantum (optimising rather than maximising site potential)

Contribution – Visual and Functional Quality

- Does the development proposal make a **positive contribution** to its setting?
- **Visually** – in terms of the quality of the architecture/design (does it improve and enhance the setting)
- Suitability of the **architectural approach**, i.e. materiality and detailing (character and appearance)
- **Functionally** – in terms of activation and use of buildings and spaces (mixed-use, diversity and choice)
- What does it 'give back' to the **community**? (social, economic, environmental benefits)
- **Sustainability** credentials (adaptability, low-energy design, green infrastructure)

Clarity – Quality of User Experience

- Quality of user experience (buildings and spaces) for residents and visitors
- **Access and inclusion**, safe and engaging public realm
- **Health and well-being** (social spaces and meeting places)
- **Legible routes and spaces**, healthy streets (spaces to stop and stay)
- **Housing design quality:**
 - Outlook, privacy and relationship to neighbours ('quiet enjoyment')
 - Space; adaptable and flexible layouts
 - Natural light, ventilation and outlook
 - Low energy and environmentally sustainable
 - Outdoor space, private and shared
 - A sense of community
- Understanding that compliance (with minimum space standards) is not the same as quality

4.18. It is important to recognise that good placemaking is not just about the physical characteristics of buildings and spaces, but how they are **used** (how they function) and how they are **experienced**. Understanding **context** is key, thinking beyond the red line boundary (zooming out and zooming in). The emphasis should never be solely on a specific building or space, it should always be about **place**, i.e. starting with people first, then space, then buildings.

Design Principles

4.19. The Council has identified six overarching principles (performance indicators) that are considered essential components in delivering good quality design, and which are widely documented as being among the key characteristics of successful well-designed places.

- **Contextual** (Character and Identity)
- **Responsive** (Architecture and Landscape)
- **Connected** (Movement and Connectivity)
- **Inclusive** (Access and Inclusion)
- **Healthy** (Health and Well-being)
- **Sustainable** (Sustainable Design, Adaptability and Resilience)

Contextual (Character and Identity)

4.20. Bromley has a strong architectural and cultural heritage with a distinctive character arising from its protected green spaces and open countryside. The success of new development is largely dependent upon how well it relates to, and responds with, its surrounding context.

4.21. As set out in the National Design Guide (NDG), well-designed places are based on a sound understanding of the surrounding context, influence their context positively and are responsive to local history, culture and heritage. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion. Well-designed places respond to existing local character and identity and contribute to local distinctiveness.

4.22. There are several historic buildings of notable architectural merit and local significance within the borough, it is expected that all new development proposals identify existing

physical, social, and cultural assets and seek to strengthen them in the design of new schemes in order to reinforce local identity and sense of place.

- 4.23. A key urban design objective is to preserve and enhance the existing qualities of the borough's townscape, landscape, and streetscape character. All new development should make a positive contribution to its setting and seek to reinforce and enhance local identity.

Responsive (Architecture and Landscape)

- 4.24. Good design is about making places for people and should seek to evoke a sense of joy and delight. Well-designed places focus not just on the physical characteristics of buildings and spaces but on how they are used and experienced. Quality is measured as much by experience as it is by appearance.
- 4.25. As set out in the NDG, well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context and proposed density, to create a coherent form of development that people enjoy.
- 4.26. The Council will seek to promote design excellence throughout the borough to ensure that new development achieves the highest standards of visual, functional and environmental quality to engage and inspire people, reflecting local identity, values, and aspirations.
- 4.27. Historically the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions.
- 4.28. In order to achieve this careful consideration should be given to the key aspects of development form: layout, scale, height and massing, appearance, and landscape. All new development should consider its relationship with both the immediate and wider context including neighbouring buildings, townscape, streetscape, urban grain, and local views, vistas and landmarks.
- 4.29. All new development should seek to reference local context to inform detail, materials, and landscape; incorporating and/or interpreting those elements that are attractive, valued and which contribute to the quality of the surrounding area. Architectural design and materiality should be sympathetic to the local vernacular and responsive to the surroundings so as not to undermine or compromise local character, identity and distinctiveness

Connected (Movement and Connectivity)

- 4.30. Ease of movement is integral to well-designed places, influencing how they function and feel. Creating better connections allows people to have greater choices between different modes of transport and greater access to social and economic opportunities both within and beyond their communities.
- 4.31. As set out in the NDG, successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries.
- 4.32. Well-designed streets contribute significantly to the quality of the built environment and play a key role in the creation of sustainable communities. The Council will seek to promote healthy streets and active lifestyles in accordance with London and Local

Plan policies by encouraging walking and cycling and promoting sustainable modes of transport.

- 4.33. Legibility is a key aspect of movement and a key urban design objective. A legible place is a place that is easy to understand and move through, new development can promote legibility by providing recognisable routes, focal points, nodes, and landmarks which stitch into the existing urban fabric. All new development should promote accessibility, legibility, and ease of movement by creating places that connect well with each other and the wider area.

Inclusive (Access and Inclusion)

- 4.34. Inclusive design is integral to good design. The built environment should be safe, accessible, and convenient for all, it is therefore essential that new development considers inclusive design principles from the outset.
- 4.35. Inclusive design aims to remove the barriers that create undue effort and separation, enabling everyone to participate equally, confidently and independently in everyday activities. (Commission for Architecture and the Built Environment (CABE), The Principles of Inclusive Design, 2006)
- 4.36. Inclusive design places people at the heart of the design process, acknowledges diversity and difference, offers more than one solution when required, provides for flexibility in use, and provides buildings and spaces that are convenient and enjoyable for everyone.
- 4.37. As set out in the NDG, well-designed places are designed to be inclusive and to meet the changing needs of people of different ages and abilities. This includes families, extended families, older people, students, and people with physical disabilities or mental health needs. They provide well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive.
- 4.38. The Council expects applicants to carry out meaningful engagement with relevant user groups at an early stage in the design process, which may include disabled people or older people's organisations.

Healthy (Health and Well-being)

- 4.39. The places in which we live and work affect our health and well-being. Adopting healthy placemaking principles which prioritise our long-term health is an essential part of good urban design.
- 4.40. As set out in the NDG, well-designed places include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion. Well-designed homes and buildings are functional, accessible and sustainable. They provide good quality internal environments and external spaces that support the health and well-being of their users.
- 4.41. New development can help to provide strong, vibrant, sustainable communities by creating healthy environments which support both physical and mental health. The link between healthy homes and access to green open space and mental well-being in particular is well documented.

- 4.42. The Council will promote healthy living by ensuring that new development seeks to maximise opportunities to support and enhance health and well-being, encouraging physical activity, providing accessible and adaptable homes, ensuring social inclusion and access to open space particularly in areas of deficiency, and optimising health benefits throughout each stage of the design process. New development can also help to combat loneliness, for example through design which delivers community infrastructure and which fosters social interaction¹⁶.
- 4.43. Objective GG3 of the London Plan advocates use of Health Impact Assessments, which are used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and well-being of the population, and to highlight any health inequalities that may arise. Health Impact Assessments should be undertaken as early as possible in the design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

Sustainable (Sustainable Design, Adaptability and Resilience)

- 4.44. The NPPF highlights three interdependent overarching planning objectives in achieving sustainable development; economic (supporting growth), social (supporting communities), and environmental (protecting and enhancing our natural and built environment) that need to be considered collectively.
- 4.45. A key urban design objective is to ensure that new development achieves the highest standards of sustainable design and construction in accordance with national, London and local plan policies to improve environmental performance by reducing energy demand, improving resource efficiency, and by encouraging the efficient use of buildings and previously developed land.
- 4.46. The London Plan highlights the importance and multifunctional benefits of green infrastructure (an important element of sustainable design) which include promoting physical and mental health, enhancing local biodiversity, and its role in helping to adapt to the impacts of climate change. Air quality, cooling, and flood mitigation can all be addressed in part with green infrastructure.
- 4.47. As set out in the NDG, well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change, is fit for purpose and adaptable over time and adopts technologies to minimise their environmental impact.
- 4.48. The most successful places are those that are adaptable to change and are able to continually evolve in order to remain vibrant. Places need to be adaptable at every scale. New development should be designed to allow for future social, economic, and environmental change to accommodate the needs of both existing and future communities.

¹⁶ 'Tackling Loneliness: A strategy for Bromley 2022 to 2026' sets out various actions the Council is taking to tackling the issue of loneliness, and may be a useful reference for applicants preparing planning applications. It is available at: <https://www.bromley.gov.uk/downloads/file/1165/tackling-loneliness-a-strategy-for-bromley-2022-to-2026>

5. Design Guidance

- 5.1. The overarching **Design Principles** described in Section 4 inform and underpin the specific design guidance provided in this section. For added clarity and ease of use, the **characteristics of successful places** discussed in Section 4, which include all aspects of urban structure (movement, layout, uses, form, and landscape), streetscape, architecture, materiality, and sustainability, are presented under the heading of each relevant design principle.
- 5.2. The guidance introduces each characteristic and its importance to good urban design, its relevance to national/regional/local policy guidance, and its application within the context of Bromley. Specific requirements are provided in the form of detailed design guidance notes which include links to relevant planning policies.

Contextual

Character and Identity

- 5.3. Understanding **context** is the starting point for any new development proposal, it refers to the location, character and features of an area within which new development will sit, it includes the immediate surroundings of the site, the neighbourhood in which it sits and the wider setting.
- 5.4. As set out in the NDG well-designed places are based on a good understanding of the site and the surrounding context, are integrated into their surroundings and are responsive to local history, culture and heritage. The **character and identity** of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. Well-designed places have a positive and coherent identity that everyone can identify with.
- 5.5. The borough is made up of a number of **places** each with distinctive characters shaped by the physical characteristics of their setting (urban, suburban, and rural) and the social characteristics of the communities who live there. Reinforcing local character and identity is a key urban design objective.
- 5.6. A comprehensive **context appraisal** should be undertaken before any design work begins, identifying existing physical, natural, social and cultural assets, which should inform and influence initial design thinking, design development, and final scheme proposals. An understanding of the borough wide context (wider surrounding area), character area or place (neighbourhood), and site setting (characteristics of the site itself) should be demonstrated as part of the design process.



Figure 5 - The Avenue, Saffron Walden: Responding sensitively to its context within a Conservation Area and adjacent to a listed water tower, by creating a series of character areas which reflect the pattern and character of the neighbouring townscape using traditional materials and modern detailing.



Figure 6 - Abode, Great Kneighton: Creating a hierarchy of spaces and housing types to suit the transition from urban edge to adjacent countryside, the transition is enhanced by the use of brick and timber cladding with soft landscaping and high-quality public realm.

DG1: Reinforcing Local Character and Identity

All development proposals should make a positive contribution to the setting and seek to reinforce local character and identity by:

- a) Responding to local context, preserving and enhancing the existing qualities of the borough's townscape, landscape, and streetscape character, and creating a coherent identity for residents and communities to identify with.
- b) Adopting a considered and informed approach in the siting and design of development to safeguard local distinctiveness and reinforce a sense of place. Responding to local building forms and patterns of development in terms of scale, massing, form, proportions, features, materials, views, vistas and landmarks.
- c) Preserving and enhancing the positive aspects of Bromley's unique character by referencing and taking cues from the surrounding context to inform an appropriate architectural language which is sympathetic and responsive to the existing or emerging context. The introduction of new building forms may be appropriate in areas which have an inconsistent character or limited qualities in order to create a more positive identity.
- d) Respecting and enhancing the settings of listed and locally listed buildings, designated Conservation Areas and Areas of Special Residential Character. Heritage assets (buildings and landscapes), character areas and landscape character areas are key to local identity, their significance as instantly identifiable tangible assets with added value and meaning to local residents should be reflected in the sensitive siting and design of new development.

Relevant policy and guidance includes:

Local Plan – policies 4, 6, and 37, 38, 39, 40, 41, 42, 43 and 44

London Plan – objectives GG1 and GG2, and policies D3, D4, H2 and HC1

NPPF – sections 11, 12 and 16

Heritage and Conservation

- 5.7. Heritage assets can strongly influence our understanding of **place**; they can make a significant contribution to our natural and built environment, positively contributing to local **character and identity**, as well as providing wider social, cultural and economic benefits.
- 5.8. As set out in the NPPF, these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 5.9. **Understanding and responding** to the historic environment is key to creating successful and sustainable places. Achieving the right balance between conservation and development requires careful management in order to enable opportunities for positive change.
- 5.10. Bromley has a particularly strong heritage with many natural and built form assets of architectural and historic significance. This includes 47 designated Conservation Areas, a significant number of statutory listed and locally listed buildings and several Registered Parks and Gardens. These make an important contribution to placemaking and are highly valued by local residents. **Preserving and enhancing** the borough's historic assets, and their settings, to ensure that they remain used and valued is a key urban design objective.
- 5.11. Applicants should provide a detailed **Heritage Statement** describing the significance of any heritage assets impacted by development proposals, including the contribution made to their setting. The level of detail should be proportionate to the assets' importance in order for an informed assessment to be made. Heritage Statements should also take account of Archaeological Priority Areas; applicants should refer to the guidance provided on the Council's website¹⁷.

¹⁷ <https://www.bromley.gov.uk/local-history-heritage/archaeology-bromley>



Figure 7 - Timekeepers Square, Salford: Reintroduces the historic street pattern of the area, while responding to the height, massing and rhythm of existing Georgian terraces. The new housing creates a positive setting for several Grade II listed buildings.



Figure 8 - The Bourne Estate, Camden: A sensitive contextual approach introduces two new blocks within an existing Grade II listed estate to complete the original layout. The buildings respond to the form and scale of the original architecture with fine brick detailing and a high-quality finish.

DG2: Preserving and Enhancing Heritage Assets

All development proposals should seek to preserve and enhance the significance of existing heritage assets. Where a proposal will cause harm to a heritage asset, clear and convincing justification should be provided. Development proposals should address paragraphs 199 to 203 of the NPPF (July 2021) and ensure that public benefits are provided to outweigh the harm or loss, commensurate with the scale of any harm or loss and the significance of the heritage asset. New development proposals should:

- a) Demonstrate an understanding of the significance of heritage assets, setting and place, including their evidential, historical, aesthetic and communal value. A strong evidence base is required in order to fully understand the impact or consequences of proposed change.
- b) Demonstrate how the architectural approach responds to local context and character and respects the significance and setting of existing heritage assets, i.e. the architectural and historic significance of listed buildings and the character and appearance of conservation areas.
- c) Respond sensitively to the siting and settings of heritage assets by adopting a considered approach to building heights, scale and massing, to minimise harm and to ensure that existing assets are not overwhelmed or obscured by inappropriate development. Townscape presence, key views, and heritage value should be protected and reinforced rather than eroded or diminished.
- d) Seek to sensitively restore, conserve and adapt heritage assets wherever possible, aspiring to a high quality of design and execution that will endure over time by carefully considering materiality and detailing, scale and proportion, hierarchy and juxtaposition (between the old and the new), legibility, authenticity and integrity.
- e) Ensure that interventions involving listed buildings/structures/landscapes do not prejudice alternative solutions in the future by adopting a flexible, adaptable, reversible and sustainable architectural approach where feasible.
- f) Consider the potential for archaeological impacts and demonstrate a clear understanding of how these impacts may influence the design strategy.

Relevant policy and guidance includes:

Local Plan – policies 4, 37, 38, 39, 40, 41, 42 and 123

London Plan – objectives GG1 and GG2, and policies D3, D4 and HC1

NPPF – sections 11, 12 and 16

Responsive

Layout

- 5.12. Layout refers to the **arrangement** of streets, blocks and plots; it provides the structure on which all other aspects of the form and uses of a development depend. The **relationship** between buildings and spaces is fundamental to the success of any development.
- 5.13. Layout can be categorised as **urban structure** (large scale) or **urban grain** (small scale). Urban structure refers to the framework of routes and spaces and how they relate to one another. Urban grain refers to the pattern or arrangement of blocks, plots and buildings. An area's pattern of blocks and plot subdivisions may be respectively small and frequent (fine grain), or large and infrequent (coarse grain).

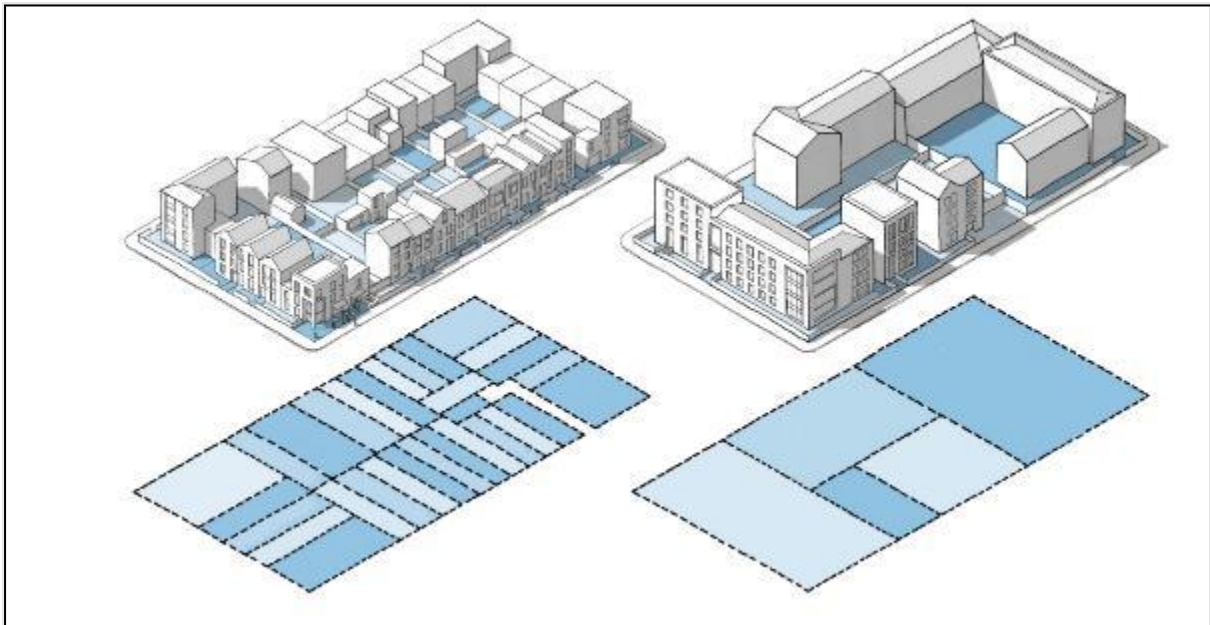


Figure 9 - Examples of fine and coarse urban grain

- 5.14. The NDG highlights the importance of the interrelationship between blocks, streets, buildings and spaces in creating coherent well-designed places which have **compact forms of development** that are walkable, legible and sustainable.
- 5.15. **Continuity and enclosure** is a key aspect of successful urban spaces; the continuity of street frontages and the enclosure of space by buildings and landscape creates spaces that are well overlooked, safe, legible and more pleasant to use. The relationship between **fronts and backs** (orientation and aspect) is also important; successful streets are characterised by buildings overlooking and animating the public realm with active frontages at ground level.

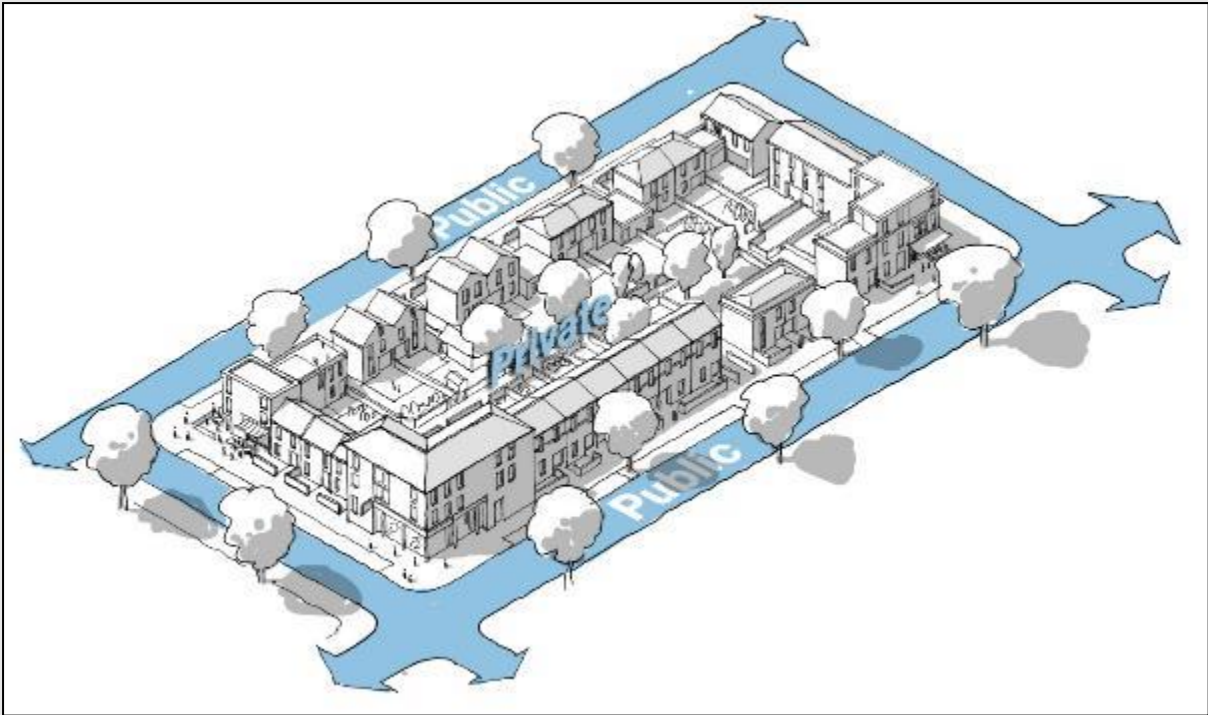


Figure 10 - Perimeter blocks create a clear distinction between the public fronts of buildings and the private backs

5.16. Bromley has a mix of urban, suburban and rural settings; the more densely populated parts of the borough benefit from a strong **street based** urban fabric which new development should seek to reinforce. Buildings should relate to existing **building lines** to reinforce and define the street; **public and private spaces** should be clearly defined.

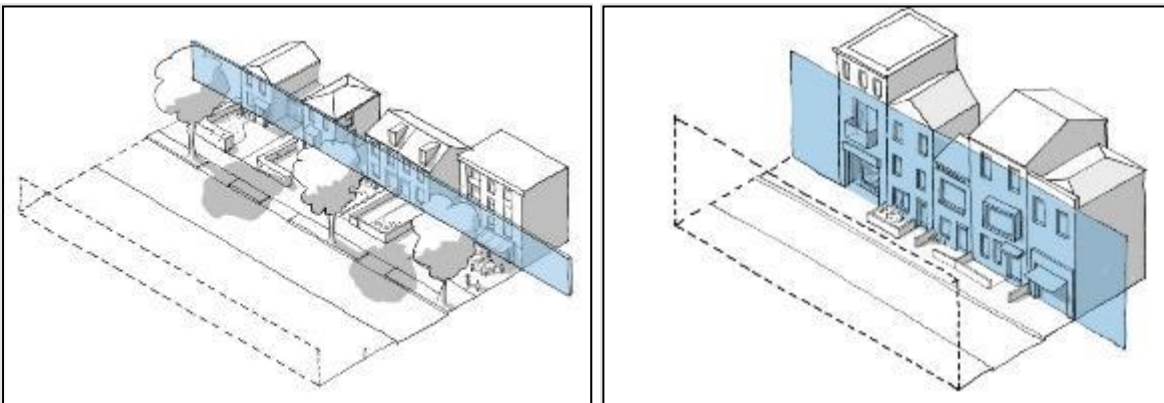


Figure 11 - The nature and position of building lines in relation to the street contributes to the character and identity of a place

5.17. Development proposals should establish a **clear hierarchy** of streets and spaces. Pedestrian movement should be a key driver in determining the optimum site layout which should reflect desire lines and movement patterns based on both the existing and emerging context.



Figure 12 - The Malings, Ouseburn: An alternative street-based approach to conventional flatted blocks. New streets run down a sloping site towards the river, optimising views and following desire lines to connect surrounding neighbourhoods. The Malings blends traditional street typologies with a combination of courtyard dwellings, back-to-backs, and taller townhouses.



Figure 13 - Goldsmith Street, Norwich: A fine grain street based approach in response to the surrounding context; a series of terrace blocks with reduced distances between properties (14 metres) creates a low-rise, high-density development with strong frontages and neatly framed communal amenity spaces.

DG3: Continuity and Enclosure

All development proposals should seek to create a coherent pattern of development recognising that every building is part of a greater whole. Development proposals should:

- a) Be consistent with, and appropriate to, the existing urban grain. Existing fine grain and narrow plot widths should be respected and maintained wherever possible.
- b) Respond to existing building lines and seek to continue established street patterns and frontages where it is an integral part of local character. Permeable routes and connections should be preserved and enhanced.
- c) Contribute positively to the legibility of the area providing a clear distinction between 'fronts and backs' and public and private space. The creation of ambiguous spaces should be avoided.
- d) Ensure the provision of good pedestrian routes with clear sightlines, active frontages, defensible space, and natural surveillance. Blank walls and dead frontages should be avoided. Buildings should be directly accessed from the street.
- e) Ensure appropriate building height in relation to street width in order to retain a human scale and to create a sense of enclosure. Setbacks and projections at upper floor can both support and detract from the public realm.
- f) Utilise where appropriate the benefits of perimeter blocks to ensure a clear distinction between public and private space, i.e. providing an active building frontage facing the street (well-overlooked public space) and secure private amenity space to the rear (enclosed private space)

Relevant policy and guidance includes:

Local Plan – policies 4 and 37

London Plan – objectives GG1 and GG2, and policies D3 and D4

NPPF – sections 11 and 12

Scale and Massing

- 5.18. **Scale** refers to the **size** of a building or the parts of a building in relation to its surroundings. **Massing** refers to the **combined effect** of the arrangement, volume and form of a building or group of buildings in relation to other buildings and spaces. The scale of a development is often referred to in terms of building height.
- 5.19. As set out in the NDG, well-designed places use the right mix of **building types, forms and scale of buildings** and public spaces for the context and the proposed density, to create a coherent form of development that people enjoy. Building heights influence the character and identity of a place and the quality of the environment.
- 5.20. **Townscape character** is dependent upon how well individual buildings relate with, and respond to, the scale of their neighbours. Respecting the scale of existing buildings helps to maintain the **continuity** of the built fabric as well as retaining local distinctiveness and townscape merit.
- 5.21. In order to safeguard local **character and identity** the scale, massing and height of a proposed development should be considered in relation to its surrounding context, including adjoining buildings, the general pattern of heights in the area, streetscape and urban grain, topography, and the impact on local views, vistas, and landmarks.
- 5.22. The scale of larger footprint buildings should be broken up into smaller component parts with stepped massing and/or indents/visual breaks within the principal elevations. Consideration should be given the scale of the individual parts of a building as well as its whole, and how these are perceived or 'read' at ground level – as experienced close-up. Equal consideration should be given to the different dimensions that make up scale; depth, width, height, with an emphasis on how development relates to **human scale**.
- 5.23. Bromley has a predominantly low-rise suburban character with a varied topography. Relating new development to the general pattern of building heights should not preclude variations in scale where conditions allow; however, retaining the continuity and respecting the qualities of local townscape character is a fundamental requirement.



Figure 14 - Camden Courtyards, Camden: The scale and massing is moderated to respond to the surrounding townscape and broken down through materiality and detailing which reflects the industrial heritage of the site. The scheme achieves high density with a maximum height of seven storeys.



Figure 15 - St Andrews, Bromley-by-Bow: Brickwork facades with a rich mix of bonds and colours, deep window reveals, generous balconies, and a variation in storey heights break up the scale of the blocks which form part of a high density residential-led scheme.



Figure 16 - Savoy Circus, Wembley, Brent: Influenced by the local context, architectural details include corbelled brick corners, reconstituted stone window surrounds and glazed brickwork providing articulation and visual interest to break up the massing of the building. The design sits sympathetically within a Conservation Area setting.

Tall Buildings

- 5.24. Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline. As set out in the London Plan, this may vary in different parts of London but should not be less than six storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 5.25. The Council will seek to identify suitable locations for tall buildings as part of the Local Plan review; in the interim London Plan policies D3 and D9, and Local Plan policies 37, 47 and 48 apply, in terms of assessing applications for tall buildings.
- 5.26. Well-located and well-designed tall buildings can provide important **urban landmarks** and much needed homes and commercial space at increased densities. They can also facilitate wider regeneration benefits and more efficient use of land. However, due to their scale and prominence, tall buildings have the potential to significantly alter local character and impact on the setting of heritage assets and conservation areas, and impact negatively on local environmental conditions and amenity (micro-climate effects).

Location

- 5.27. The existing prevailing heights in an area are particularly important in determining suitable heights for new development proposals. However, it is important to note that the presence of an existing tall building does not in itself provide adequate justification for the siting of a new tall building nearby. Tall buildings require a strong **townscape justification** which usually includes visual emphasis, marking thresholds of land use. New development should *acknowledge* and respond to local context but should not be *competing* with existing townscape markers in terms of their height and scale. Understanding **context** and **impact** should take priority over attaining specific heights and commercial incentives.
- 5.28. It is essential that proposals for tall buildings respond appropriately in terms of their height, scale and massing to both the **immediate context** (relationship with neighbouring buildings/impact on amenity) and the **wider context** (townscape/skyline). Tall buildings should not be seen as architectural 'objects' where the focus is solely on the skyline, the relationship with the street/public realm is an equally important design consideration. Understanding place (character and context) is key.

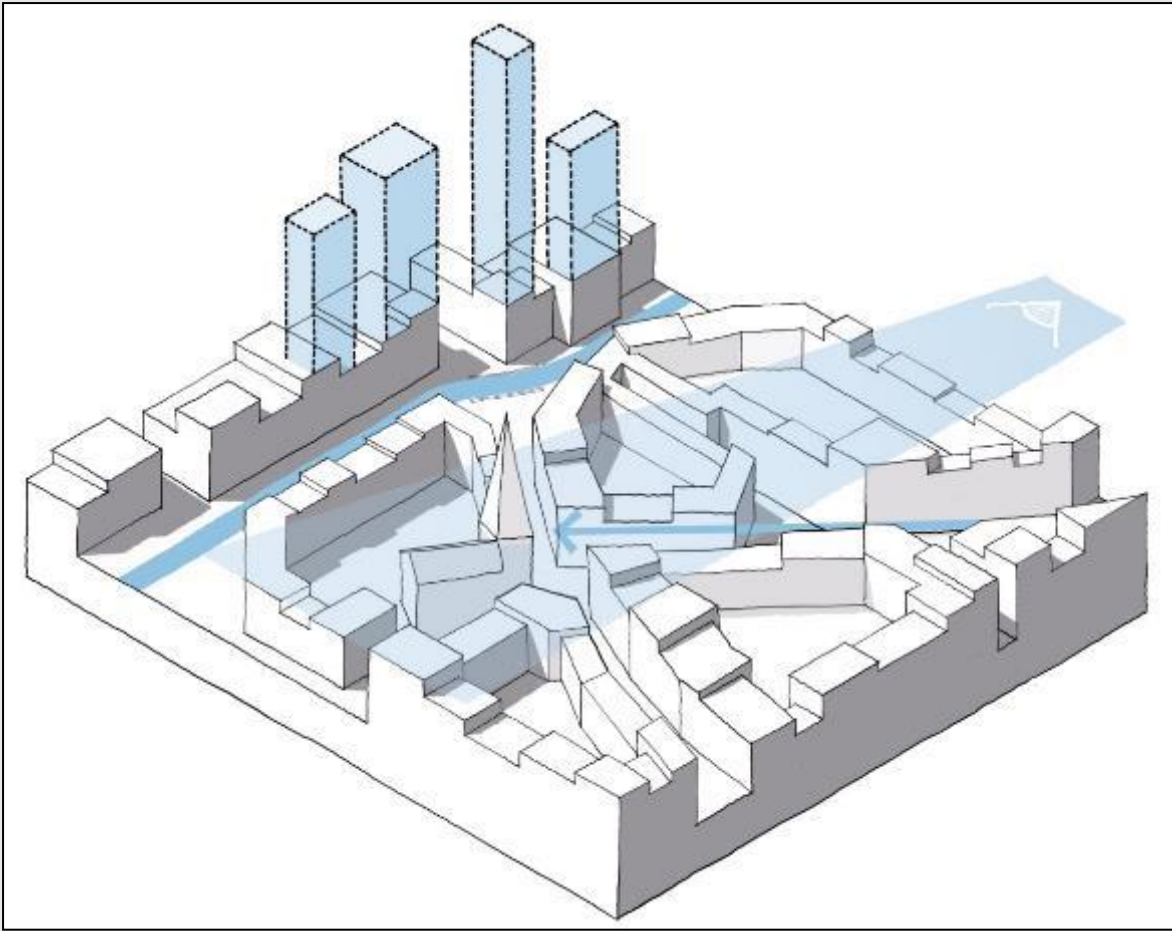


Figure 17 - Tall building principles: Topography, heritage assets, local character, conservation areas, transport accessibility, skylines, sensitive local views vistas and gateways

5.29. Much of the borough is not considered appropriate for tall buildings due to its low-rise suburban character. However, potential may exist in **metropolitan and major town centre** locations which benefit from good public transport and an existing urban character.

Impact

5.30. In accordance with London Plan policy D9, development proposals should address the **visual, functional, environmental** and **cumulative** impact.

5.31. All development proposals for tall buildings are required to consider the impact on the setting including **key views** and heritage assets. Immediate, mid-range, and long range-range views should be carefully considered and included within a comprehensive Heritage and Townscape Visual Impact Assessment.

5.32. Proposals for tall and large buildings should be of the highest **architectural quality** and demonstrate an understanding of place. Tall buildings should be grounded in their context, they require **articulation** and a **clear narrative** informed by local character and identity which should be reflected within the architecture, materiality and detailing - particularly those which form part of an established built-form frontage, as opposed to stand-alone buildings which may, where appropriate, convey a different identity. All tall buildings should have a clearly defined 'top', 'middle' and 'base' responding positively to both the skyline and the street.

- 5.33. **Servicing, maintenance, building management arrangements** and **safety** should be considered at the start of the design process. It must be demonstrated that the capacity of the local area and its transport network is capable of accommodating the functional impacts from the quantum of development proposed. The setting and the surrounding area must be able to absorb the impact (on local services and the public realm) from the increased activity patterns generated.
- 5.34. Wind, daylight, sunlight penetration and temperature conditions around the building(s) must be carefully considered and should not compromise comfort and the enjoyment of open spaces. **Daylight and sunlight** (overshadowing buildings and spaces), **temperature** (wind chill, shade and overheating), and **cumulative** impact (amenity spaces and Urban Heat Island effect) should all be carefully considered. It is important to recognise that the **human experience** can often differ from numerical data which may not reflect the true extent of the impact.



Figure 18 - Elephant Park, London: Creates a distinctive neighbourhood comprising of townhouses, mansion blocks and a 16-storey tower; executed in blends of five different bricks creating a playful, decorative effect which breaks down the volume of the large-scale blocks.



Figure 19 - Blackfriars Circus, London: Introduces a 28-storey tower with a slender facade and pre-cast sills at every other level to create a strong vertical emphasis, a variety of stock and glazed bricks are used to enhance key elements of the building including a colonnaded base. The selection and application of materials helps to differentiate and establish a unique identity.

DG4: Tall Buildings

Development proposals for tall buildings will be required to make a positive contribution to the townscape ensuring that their scale, massing and layout responds to and enhances the character of the surrounding area. All development proposals should:

- a) Consider the visual, functional, environmental, and cumulative impact on both the immediate setting and the wider surrounding context in accordance with Policy D9 of the London Plan.
- b) Be of the highest architectural design quality with a clear base, middle, and top strategy; the tops of tall buildings should make a positive contribution to the skyline, the base should engage with the street frontage and frame the public realm. The relationship with the street should be a key consideration.
- c) Seek to achieve an appropriate transition in scale by considering a variety of design forms including stepped shoulder elements, expressing a vertical emphasis/horizontal banding to break up the appearance of mass and/or creating slender elegant proportions to avoid a dominant and overbearing appearance.
- d) Acknowledge and respond to existing and emerging development without competing with neighbouring landmark buildings in terms of height and scale. Proposals for 'marker' or 'gateway' buildings will require a strong evidence-based townscape justification.
- e) Consider the impact of microclimate effects particularly wind and overshadowing; mitigation measures should be designed in as integral features from the outset to avoid the need for post-planning retrofit solutions. The design of individual facades should be influenced by their particular orientation responding to solar gain, noise mitigation, and/or key views.

Relevant policy and guidance includes:

Local Plan – policies 4, 37, 47 and 48

London Plan – objectives GG1, GG2 and GG3, and policies D3, D4, D5, D9 and D12

NPPF – sections 11 and 12

Architectural Design

- 5.35. Good design is central to delivering sustainable homes and communities. Design quality is not just about the aesthetics of a building or a particular architectural style; well-designed places consider the **aesthetic** (visual), **functional** (physical), and **sustainable** (social and environmental) qualities of **place**. Good architecture should make a positive contribution to its setting, connect people and place, and seek to evoke a sense of joy and delight.
- 5.36. As set out in the NDG, well-designed development proposals are shaped by an understanding of the existing **context** including the architecture prevalent in the area, the local vernacular and other precedents that contribute to **local character**, to inform the form, scale, appearance, details and materials of new development. Development should seek to positively **respond** to context and character through an appropriate architectural approach.

Architectural Approach

- 5.37. The principle of assessing local character and responding appropriately forms a key part of the design-led approach. There are 3 broad architectural approaches which can be adopted in response to local character and context. These can be categorised as:
- **Restore - ‘sympathetic and faithful’** – proposals which closely relate to the existing surrounding typologies by pursuing a similar form, style, materials and detailing (typically suitable for more sensitive areas i.e. Conservation Areas and ASRCs)
 - **Re-imagine ‘contemporary reinterpretation’** – a contemporary but respectful reinvention of traditional forms/features/materials to create a design language that responds to local character
 - **Replace ‘innovative and original’** – unique solutions through the contemporary use of form, materiality and detailing (typically more appropriate in areas of an inconsistent character)
- 5.38. A comprehensive character assessment should be undertaken by applicants to help inform and justify why a particular design approach has been adopted.



Figure 20 - Sympathetic and faithful



Figure 21 - Contemporary reinterpretation



Figure 22 - Innovative and original

Form

- 5.39. There are several recognisable residential/mixed-use building typologies, including terrace, linear block, villa block, and tower; each have their own characteristics, qualities and limitations. These can be combined in different urban arrangements for different purposes, i.e. creating a continuous street frontage, framing courtyard spaces, marking prominent junctions and corners, increasing densities, and/or unlocking highly constrained sites. The selection and combination of building forms and arrangements should be carefully considered, **contextually appropriate**, and enable **efficient** and appropriate use of land.



Figure 23 - Goldsmith Street, Norwich: A quiet, modest character based on a traditional suburban street with simple building forms creating a clear, legible identity informed by the surrounding context.



Figure 24 - Horsted Park, Chatham: A series of housing typologies arranged and designed to reference the local rural vernacular creating familiar forms with a contemporary appearance expressed through materiality and detailing.

Rhythm, Scale, and Proportions

- 5.40. Many of the more densely populated parts of Bromley are characterised by traditional suburban residential streets comprising of characterful Victorian and Edwardian properties. These typically have a strong and distinct **rhythm** (vertical and horizontal) and a prevalence of unifying features, materials and detailing.
- 5.41. **Proportion** is the relationship in scale between different building elements, such as walls and window openings (solids and voids), which help in-part to define character. A building's solid-to-void ratio (the proportion of wall to windows/doors) and how the openings are arranged can determine its impact and help to harmonise new development (traditional and contemporary) with existing buildings.
- 5.42. Development proposals should seek to reflect and respond to the prevailing rhythm, scale, proportion and detailing of existing buildings, **referencing** and reinforcing distinctive/attractive elements rather than directly **replicating** architectural styles in order to avoid pastiche design.



Figure 25 - South Gardens, Elephant Park, London: *A contemporary interpretation of the Victorian bay window referencing an existing terrace on the opposite side of the street*

Roofscape

- 5.43. The majority of areas within the borough are characterised by pitched roofs, including hipped, gable, and crown roofs. Roof forms should be proportionate to the mass of the building and be integral to its design. Roof forms should be designed to minimise the visual impact, and positively respond to the character of the area.
- 5.44. In areas where flat roofs are appropriate, buildings should seek to minimise the visual impact from street level by setting back upper floor elements to reduce the appearance of bulk. Set-back top floor elements should relate to the character/form of the building

and should typically adopt a more lightweight appearance whilst not appearing as a separate entity.

- 5.45. Caution should be applied to prominent projecting/cantilevered elements which can create an overcomplicated external appearance, an uncomfortable relationship with neighbouring buildings, and/or have a negative impact on the streetscene/public realm.
- 5.46. Rooflines should reflect the **rhythm, harmony** and **scale** of the street frontage, particularly in areas where a consistent roofline contributes to local character. Stepped and sculptured rooflines can appear monolithic particularly when the shape and form is unrelated to the existing context. Stepped rooflines may however be appropriate in response to changes in scale, the safeguarding of key views, and/or in response to existing streetscape conditions/topography.
- 5.47. On larger developments, functional elements such as roof mounted plant/enclosures, lift overruns, maintenance gantries and safety balustrades should form an integral part of the overall building form and be designed to minimise visual impact from street level.



Figure 26 - St Chad's, Tilbury: Traditional pitched roof forms with high quality materials and detailing create a familiar but contemporary feel.



Figure 27 - Accordia, Cambridge: Adapting a traditional housing typology with a distinctive asymmetrical roof form, optimising light, ventilation, and internal connectivity whilst maintaining a terrace-like urban form to the street.

DG5: Architectural Design

All development proposals including extensions to existing buildings, will be expected to be of a high quality design. Development proposals should:

- a) Identify and respond to the characteristics of the area and follow one of the three broad approaches outlined in paragraph 5.37 of this guide. Applicants should justify why a particular approach has been chosen and demonstrate how local character assessment and wider contextual analysis has informed the design.
- b) Carefully consider the selection and/or combination of building forms and typologies to ensure they are contextually appropriate and enable efficient and appropriate use of land.
- c) Reflect and respond to the prevailing rhythm, scale, proportion and detailing of existing buildings/elements, referencing and reinforcing distinctive/attractive elements through a traditional, contemporary re-interpretation, or innovative design approach.
- d) Ensure that roof forms relate to the character/form of the building, are proportionate in size and appear integral to its design. Roof forms should be designed to minimise the visual impact on the street and positively respond to the character of the area.
- e) Consider both the site and its surroundings; rooflines should reflect the rhythm, harmony and scale of the street frontage particularly in areas where a consistent roofline/form contributes to local character. Overly prominent elements which appear detached from, and/or unrelated to, the existing context are unlikely to be considered acceptable.
- f) Extensions and alterations to existing dwellings should respond to character (by adopting an appropriate design approach) and appear subservient in scale to avoid uncharacteristically large additions which can significantly change the appearance of a property and have a detrimental impact on character and amenity. Careful consideration should be given to form, fenestration, materials and detailing.

Relevant policy and guidance includes:

Local Plan – policies 4 and 37

London Plan – objective GG1, and policies D3 and D4

NPPF – sections 11 and 12

Materials and Detailing

- 5.48. Good design introduces visual **richness** through the use of materials and detailing. Richness refers to the composition and detailing of elements to provide articulation and interest which contributes to the character and appearance of an area.
- 5.49. The choice and treatment of materials impacts on both the appearance of buildings and spaces and the way in which they function. The texture, colour, and pattern of materials (aesthetic qualities) influence how buildings and spaces relate to their surroundings and how they are perceived and experienced. The durability, life-span, and technical performance of materials (functional qualities) impacts on the environmental sustainability of new development.
- 5.50. Materials should be of a high quality, practical, durable, and attractive. The choice of materials should be integral to the architectural approach and **respond** to the character and context of the site and its surroundings.



Figure 28 - The Avenue, Saffron Walden: *Sympathetically designed to reflect the character of the surrounding area with a mixed palette of materials and crisp contemporary design detailing.*

- 5.51. Bromley has a range of architectural styles reflecting different eras. Early Victorian/Edwardian suburbs are characterised by natural slate tiles, stock brick and timber with attractive bay windows and door cases. Later suburbs are typified by clay tile and red brick with a greater variety of architectural treatments. Interwar housing features English, Georgian and mock-Tudor styles, while post-war housing features a range of modern building materials resulting in a very different character.
- 5.52. Brick is the most widely used material in Bromley's built environment and is the unifying feature across the various styles of architecture. Brick is robust and durable with excellent weathering properties. The quality of brick, colour, texture, bond, mortar

and pointing is key to achieving a high-quality brickwork finish. Brick slips are less durable, their longevity is often compromised by inadequate adhesives/fixings and will therefore not be accepted in most cases.

5.53. The use of render, metal cladding, and timber cladding can weather poorly creating visually unappealing discolouration and deterioration. Development proposals that seek to use external render and/or metal/timber cladding will only be acceptable as part of a compelling architectural approach and where detailed design and maintenance considerations (including water run-off from roofs) can be demonstrated.

5.54. In areas where there is a strong sense of character through the particular use of materials, new development should be based on a similar palette. Careful consideration should be given to colour, texture and form particularly for larger more prominent buildings where bright colours and highly reflective materials can create glare. A subtle, neutral palette is considered more appropriate for much of the borough. In Conservation Areas in particular, it is important that the materiality respects the historic and architectural interests of its surroundings.



Figure 29 - Timekeepers Square, Salford: A limited materials palette is used throughout the scheme; predominantly a light brick in response to the sandstone of the nearby Grade II listed church. The materiality and architectural detailing is simple and restrained.

5.55. In less sensitive areas there may be scope to introduce more contemporary materials which can offer a 'lighter' elegant contrast to the more 'solid' appearance of traditional materials even in historic environments. However, it is important to retain a sense of **harmony** and **continuity** between new and existing buildings; compatibility of materials (colour, texture, scale of use) and quality of architecture is key.

5.56. The choice of materials should also be influenced by the wider **environmental impacts**; careful consideration should be given to whole life cycle costs, embodied

energy, thermal performance and energy efficiency. Consideration should be given to the durability, robustness, and weathering properties of materials, with maintenance requirements considered at an early stage in the design process.

- 5.57. **Detailing** refers to the individual **components** or parts of a building and how they fit together, these include junctions, openings, entrances, balconies, facade treatments, decorative features, ironmongery, lighting, rainwater gutters and pipes.
- 5.58. These elements contribute towards both the appearance and functionality of a building affecting how it is experienced and how well it weathers and lasts over time. Successful developments are often determined by the quality of **detailed design** (material specification, craftsmanship, construction and maintenance) and the level of thought and care applied throughout each stage of the design process.
- 5.59. Materials and detailing are intrinsically linked; detailing can add **depth** and **character** to buildings and spaces providing added visual interest and contextual meaning and help to mask/integrate less appealing functional requirements such as bin stores and plant.
- 5.60. Attention to detail should be applied to each of the component parts identified above for all development regardless of scale. The detailed design of individual elements directly impacts on the quality of a scheme as a whole.

Junctions

5.61. The treatment of **junctions** between new and existing buildings requires careful consideration in terms of materiality and detailed design. This ensures a coherent interface between buildings and a clear distinction between 'existing' and 'new', particularly where there is a distinct contrast in architectural styles and/or where development directly impacts on heritage assets.

5.62. In the case of heritage assets consideration should be given to the following factors:

- **Proportion and hierarchy** - creating subservient or more prominent additions.
- **Rhythm and juxtaposition** - credibility of new buildings/additions whilst retaining the presence/prominence of existing original structures.
- **Complementing or contrasting** - choice of architectural design approach.
- **Readability and honesty** - materials and quality of finish.
- **Junctions and transitions** - between the old and the new; spaces and voids, contrasting materials, recesses/projections, shadow gaps, changes of level.



Figure 30 - The Granary, Barking: A new bronze clad extension takes its cue from the gabled form of the original building and is attached via the vertical circulation core and a high level bridge link. The contemporary design clearly distinguishes the 'old' from the 'new' whilst respecting the existing 19th Century building.

Openings

- 5.63. Windows and doors are key components within a facade; their size and placement should be carefully considered. Generously sized window openings can help to break down the scale and mass of building frontages and provide visual relief to street facing elevations. The style and proportions of windows and doors can also be a key characteristic of an area.
- 5.64. A contextual analysis should be the starting point to inform window and door proportions and positioning. The decision to replicate or depart from existing consistent patterns of openings should be carefully considered and justified as part of the overall architectural approach. For infill developments, referencing the size and proportions of openings in existing neighbouring buildings is key to retaining a sense of rhythm and harmony, particularly where there are contrasting architectural styles or materials.
- 5.65. The proportions and position of windows can influence how the height and scale of a building is perceived. The scale of tall or wide buildings can be broken down by emphasising either vertical or horizontal proportions within the expression of the facade.



Figure 31 - Park View Mansions, Chobham Manor: *Generously sized openings help to break up the mass of the three-storey townhouses, the positioning adds rhythm to the facade animating the elevation*

- 5.66. Structural depth and interest can be created by employing deep window reveals. Recessed windows on larger scale buildings in particular help to avoid the creation of 'flat' featureless facades, providing contrasts of light and shade (aesthetically) as well as aiding cooling from solar gain (functionally).



Figure 32 - Ely Court, Brent: A rhythmic composition of recessed windows, front porticoes, upper porticos and recessed balconies creates a highly articulated street facade.

- 5.67. Orientation and passive design principles should be key considerations in relation to the size and placement of windows; a high proportion of glazing on south facing facades may require mitigation measures to control the risk of overheating.
- 5.68. Front entrances to buildings should be prominent, clearly identifiable and of a scale that responds to the scale of the building. Entrances should be well overlooked and directly accessed from the street.

Balconies

- 5.69. Balconies can appear particularly prominent features within a development. The design should be an integral part of the scheme both visually and functionally; in animating facades and providing valuable private amenity space.
- 5.70. Recessed balconies reduce the visual impact on the streetscene and are typically more appropriate in areas where projecting balconies would be out of character and on elevations which front busy roads where noise and air pollution would deter use.
- 5.71. Cantilevered balconies are more prominent and should be carefully integrated into the design of the building, preferably forming part of the design narrative; they should not appear as unrelated or generic 'bolt on' features.
- 5.72. Balconies provide an opportunity to positively enhance the appearance of a building, careful consideration should therefore be given to the detailed design. Solid, enclosed

balconies can appear overly 'heavy' particularly on large scale blocks; open balustrades can appear 'lighter' providing a greater visual contrast and relief from brick facades.

- 5.73. Metal balustrades should be finely detailed and respond to the materials of the building envelope (style and colour). Glass balustrades can appear generic and overly commercial in nature often jarring with the character of a traditional suburban setting and will therefore not be accepted in most cases. Glazed balustrades are typically more suited to large scale developments which seek to establish their own separate identity.
- 5.74. Balconies and terraces should feel sufficiently private in order to function as usable space; the balustrade design will determine the degree of privacy provided. It is important to achieve a balance between outlook (views out) and overlooking (views in). Perforated patterned metal balustrade designs can be used to create an attractive screen to address direct or indirect overlooking. Part solid/part open balustrades (front and side ends) can also be used to create a suitable balance between privacy and outlook.



Figure 33 - Balcony design can form an integral part of a building's composition, character and identity

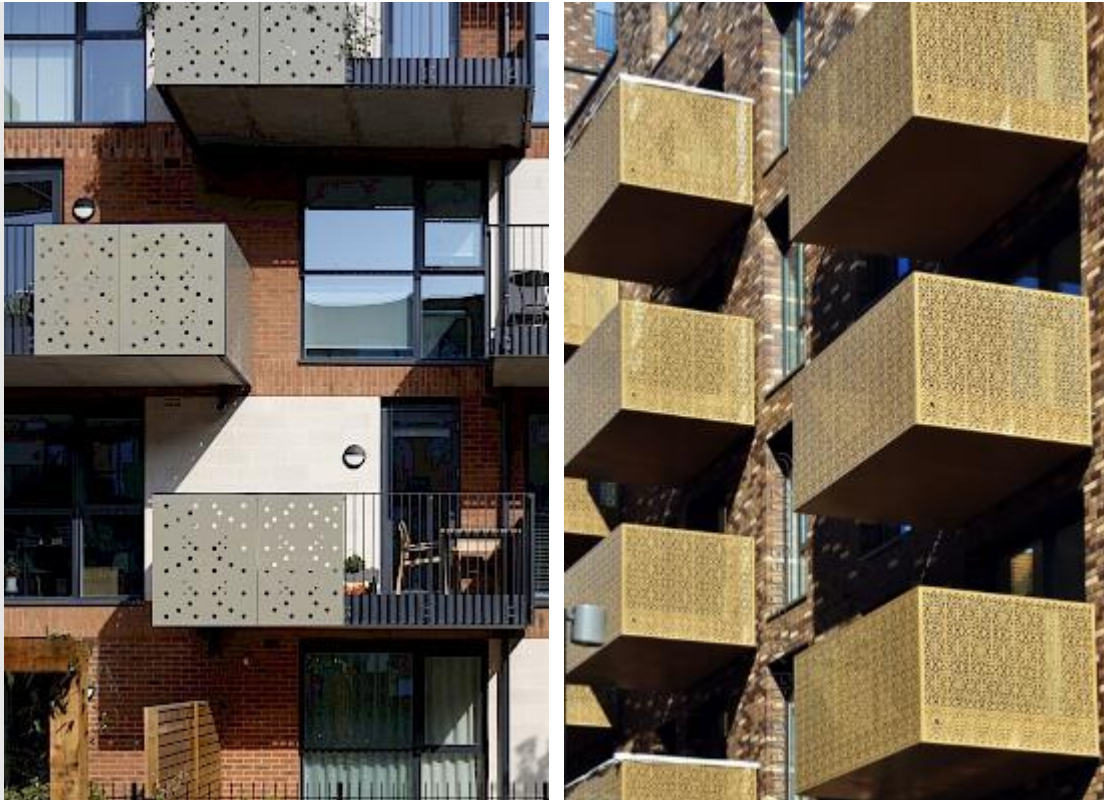


Figure 34 - Decorative patterned balustrade designs add visual interest animating facades

5.75. Balconies and winter gardens can play an important role in articulating elevations. On larger developments the arrangement of balconies can be key. Symmetrical arrangements can contribute to the structural order of a building, but equally the continuous repetition can appear monotonous. Staggered arrangements can create interest and ‘movement’ across the facade but may disrupt the composition of the building. The careful grouping of balconies into ‘blocks’ (vertically across floors and horizontally spaced at regular intervals) can help to achieve a suitable balance between enhancing the facade and contributing to the rhythm of the street frontage.

Facade Treatment

5.76. The effective use of high-quality materials and well considered detailing to express different elements of the facade and add visual interest can significantly improve the overall quality of a scheme.

5.77. The depth and quality of architectural expression and the extent to which this is informed by local context is key. There are several ways to animate prominent elevations and/or highlight entrances and cores, these include:

- Projecting/patterned brick (chequerboard, diaper, corbelled, banded, sawtooth);
- String and soldier course brickwork detailing;
- Stone coping/banding (parapets, sills);
- Aluminium panelling/metalwork;
- Full height glazed elements (visual breaks/links); and
- Bespoke balcony/balustrade/brise soleil design.

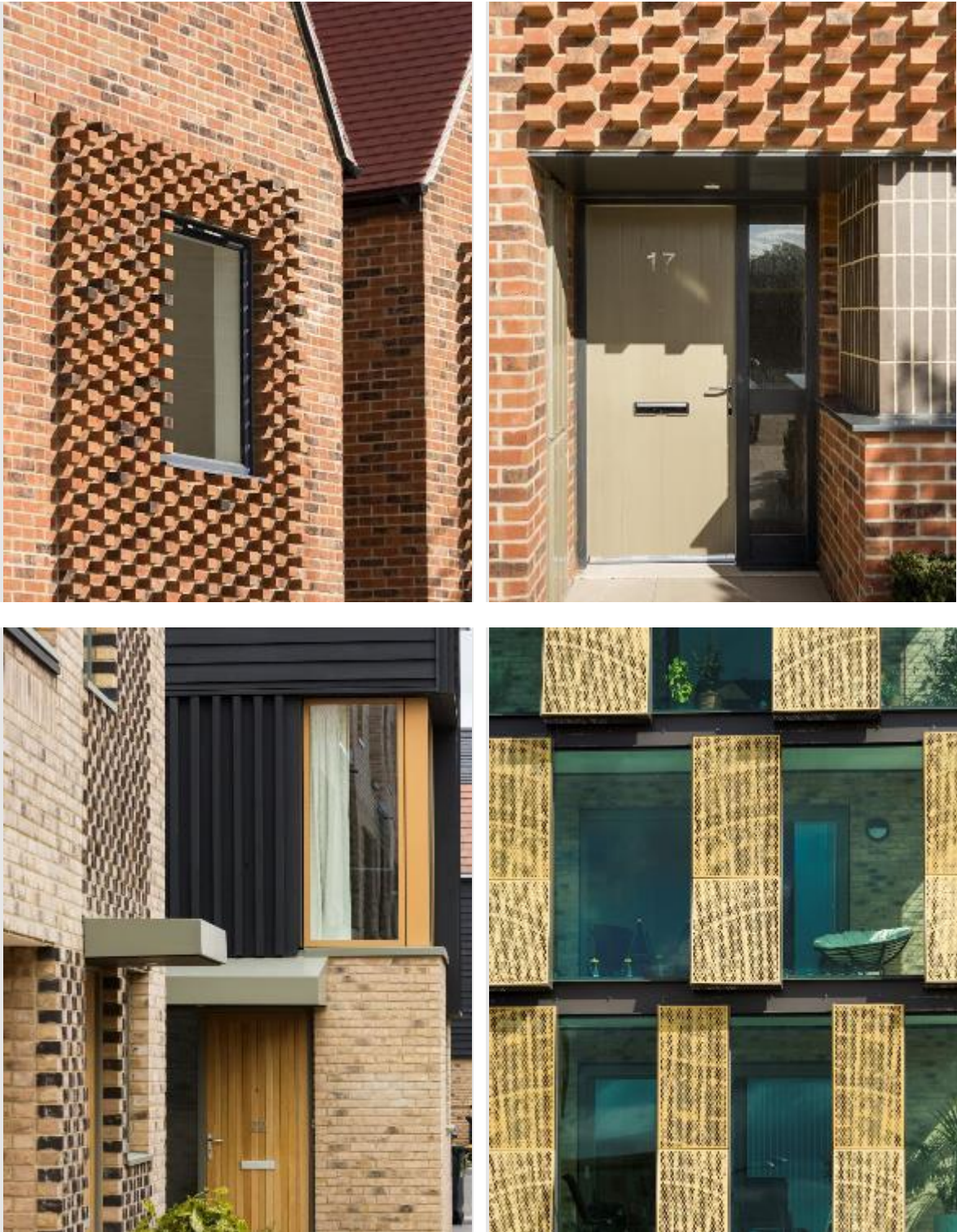


Figure 35 - Examples of facade treatments providing depth and quality of architectural expression

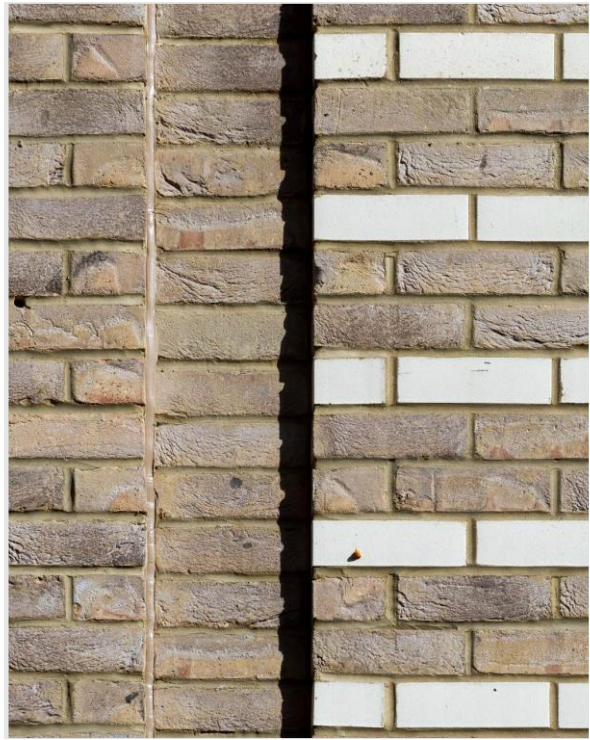


Figure 36 - Examples of facade treatments providing depth and quality of architectural expression



Figure 37 - Examples of facade treatments providing depth and quality of architectural expression

5.78. Facades can be further articulated by employing recesses and projections which can help to clearly articulate the separate volumes/elements of a building, particularly in the case of larger blocks where the appearance of an unbroken mass can be too great. Similarly, on a smaller scale, repeating projecting bay windows and recessed front entrances can help to accentuate plot widths and houses.

5.79. The opportunity for the articulation of facades to provide functional benefits in addition to aesthetic qualities should also be considered. The design of vertical louvred and horizontal brise soleil elements can significantly improve the thermal comfort of a building.

Ancillary Elements

5.80. Careful consideration should be given to the exterior detailing of ancillary elements. Drainpipes, gutters and meter boxes should be integrated into the design so as not to diminish the appearance of the building. Servicing items should be discreetly located away from prominent elevations and where possible within the building envelope. Solar panels should be integrated into the design at an early stage and should not appear as an overly prominent feature from street level. In sensitive areas in particular, consideration should be given the visual impact on both the host building and its surroundings.

5.81. Solar tiles provide an alternative option to PV panels, they are visually more attractive and discreet than conventional PV panels as they form part of the existing roof structure (replacing standard tiles) rather than being installed as a separate visually prominent entity. Solar tiles can be designed to resemble the appearance of traditional slate or ceramic tiles, they are particularly advantageous in Conservation Areas or Areas of Special Residential Character. The use of solar tiles will be encouraged in more sensitive areas of the borough in order to minimise visual impact.

DG6: Materials and Detailing

The choice of materials should form an integral part of the architectural approach and should be shaped by an understanding of local context. All development should:

- a) Ensure that new materials are sensitive to the immediate site context and sympathetic to the surrounding area so as not to undermine local character and identity. Materiality and detailing should respond positively to the setting and the wider townscape.
- b) Ensure that materials relate well to the architectural style and ethos of the scheme, i.e. traditional materials for a local vernacular approach, new materials for a more modern approach/methods of construction. The use of high-quality, durable materials is an essential requirement for all development proposals.
- c) Ensure that the right contrast is provided between different materials avoiding chaotic compositions and consider alternative applications of the same material in order to retain a sense of harmony and coherence within the design itself and between new and existing buildings.
- d) Provide depth, articulation and visual interest through the use of high-quality materials and detailing which should reference rather than replicate existing details to avoid pastiche design. The detailed design of junctions, openings, entrances, balconies, facade treatments, decorative features, lighting, and ancillary elements should be carefully considered.
- e) Consider both the aesthetic and functional qualities of materials and whether they are appropriate for the way in which they are to be used in terms of visual impact, durability, life-span, and technical performance. Development should be designed to minimise maintenance and repair costs.
- f) Consider the wider environmental impacts of chosen materials in relation to whole life cycle costs, embodied energy, thermal performance and energy efficiency.

Relevant policy and guidance includes:

Local Plan – policies 4, 37 and 47

London Plan – objective GG3, and policies D3, D4, D9 and D12

NPPF – sections 11 and 12

Housing Design

- 5.82. The Local Plan and the London Plan set out an aim to deliver thousands of new homes in Bromley over the next decade. It is crucial that new housing is delivered to a high standard providing **comfortable, safe, accessible, and environmentally sustainable** homes to accommodate the changing needs of residents throughout their lifetimes.
- 5.83. As set out in the NDG, well-designed homes and buildings provide good quality internal and external environments for their users, promoting health and well-being. They relate positively to the spaces around them and allow for easy operation and servicing. Where different tenures are provided, they should be well-integrated and designed to the same high quality to create **tenure neutral** homes and spaces. All development proposals should seek to create homes with **identity** and a sense of **well-being** with access to **open space**. The aim should be to create efficient spaces without sacrificing comfort, character, or design quality.
- 5.84. Creating a sense of **community** and **belonging** is key. It is important to understand the relationship between 'quality of life' and 'place', i.e. creating integrated social environments which enable people to feel **connected** to their neighbours. Applicants will therefore be expected to prioritise people (health and well-being) and place (character and identity) in creating **places** over architectural statements and visions, or economic return. The Council will seek to embed key design principles from the start to avoid the risk of value engineering later in the design process.

Key Principles

- 5.85. Good quality housing does not need to be expensive and/or overly complicated; delivery is largely dependent upon the application of sound design principles:
- Character and identity (responding to site/context - not replicating pre-conceived ideas)
 - Privacy and relationship to neighbours (creating 'quiet enjoyment')
 - Space and flexible layouts (not just 'size' of space but how flexible and adaptable the space is)
 - Natural light, ventilation, and outlook (orientation, aspect, cross-ventilation)
 - Low energy and environmentally sustainable (energy performance)
 - Outdoor space, private and shared (generous, functional, and accessible)
 - Practical servicing and maintenance (waste storage/management and utilities)
 - A sense of community (social interaction and inclusion)
- 5.86. It should be noted that **compliance** with minimum standards (space, ceiling heights, daylight and sunlight etc.) does not necessarily equate to **quality**. All development proposals should seek to exceed minimum standards wherever possible in order to deliver a high standard of accommodation for future occupants.

Aspects of Quality

- 5.87. Quality can be measured by considering three key aspects (pillars); **aesthetic** (visual), **functional** (physical), and **sustainable** (collective) design qualities.
- *Aesthetic quality:*
 - Context - relationship with surroundings (natural and physical)
 - Materials and facades (creating/responding to 'place')

- *Functional quality:*
 - User experience (accessibility and livability)
 - Health and well-being (healthy homes/buildings/spaces)
 - Durability/longevity (materials and construction)
- *Sustainable quality:*
 - Environmental impact (life cycle/low energy)
 - Social sustainability (community focused/inclusive design)

5.88. The Council will encourage all applicants to plan for the long term, to think beyond the red line boundary, and to adopt an **outcome focused** approach. The aim is to **lock-in quality** early in the design process in accordance with the Council's overarching design principles (performance indicators) to deliver housing quality.

Typologies

Semi-detached

5.89. Synonymous with suburban life, much of the borough is characterised by semi-detached houses. Semi-detached housing enables conventional front-to-front and back-to-back layouts, a generous frontage, greater opportunities for additional privacy, daylight/sunlight, ventilation, and future adaptation/extension than the terrace. Proposals may however require justification in terms of efficient land use on larger sites.



Figure 38 - Horsted Park, Chatham: Pairs of semi-detached houses with recessed entrances and expressed gables provide a strong rhythm to the streetscape. Projecting chequerboard brickwork patterning provides a visual identity and sense of character.

Terraces

5.90. The traditional terrace forms a familiar part of our urban fabric; it can maintain front-to-front and back-to-back relationships, clearly defines public and private realms, and makes good use of land. The simplicity of the terrace provides added flexibility (accommodating flats and single dwellings). The width of the frontage and ceiling heights are key to daylight and ventilation, the treatment of the unbroken facade is key to establishing/influencing the character of the streetscene.



Figure 39 - Anne Mews, Barking: Traditional terraced houses focusing on the simple application of high quality materials and a generosity of scale, featuring large window openings, recessed entrances and integrated bin storage. The scheme creates a strong street frontage and a welcoming streetscape.



Figure 40 - Hammond Court, Waltham Forest: Carefully crafted architecture with an emphasis on quality of place; terraced houses, maisonettes and flats enclose a south facing courtyard with shared and private amenity spaces. Homes are dual aspect with generous space standards designed for longevity and flexibility.

Flats (linear/urban villa blocks and towers)

5.91. The form and arrangement of flatted blocks and internal spaces determine residents experience of 'home' and a 'sense of place'. The relationship between the street and home is key; prominent, generously sized, well-lit entrance lobbies with a strong visual connection should be provided along with naturally lit/ventilated corridors and circulation spaces. Long hotel-like internal corridors serving single aspect flats should be avoided. The provision of dual aspect homes, private outside space, and shared communal spaces/facilities are important requirements.



Figure 41 - Silchester Estate, Kensington and Chelsea: A mix of housing typologies combined to create a legible human scale urban block enclosing a shared garden. Openings have a vertical emphasis with regular repeated proportions creating a rhythm to the streetscene. All homes are dual aspect providing good levels of daylight and cross-ventilation with access to private amenity space.



Figure 42 - Trafalgar Place, Southwark: Comprising of linear blocks, villa blocks and a tower, the scheme reconnects previously fractured surrounding neighbourhoods, creating a pedestrian link and an internal courtyard space. The design features simple building forms prioritising interior space and spaces between buildings. Different shades of brickwork are used to define key elements giving each building a slightly different character.

Maisonettes

5.92. The maisonette is a flexible hybrid typology which combines the benefits of both a terraced house and a flat, typically located at ground and first floor level with independent access to the street they can provide family housing in higher density developments. Variations and innovations (duplex/triplex/stacked) should be a bespoke response to context, aspect, and outlook (street, podium edge, courtyard). Flexibility, dual aspect, cross-ventilation, and private/shared amenity space are important elements regardless of form/application.



Figure 43 - Vaudeville Court, Islington: The design features a mix of maisonettes on the ground and first floors, and two-bedroom flats above. Arranged in two terraces, with private gardens between them, the scheme references the scale of neighbouring buildings and reinstates the street frontage. The family homes are dual aspect with open plan living space and a private courtyard garden. Garden rooms give families extra amenity and storage space.

DG7: Housing Design

All development should seek to deliver a high standard of housing design quality in accordance with London Plan and Local Plan policies in order to meet the needs of a diverse range of users. Development proposals should:

- g) Ensure that new homes have character and identity informed by local context with a strong sense of community, place, and place attachment for existing and future occupants. All elements of elevational design should be tenure blind.
- h) Have a positive and considered relationship with neighbouring buildings and spaces, providing privacy, safety, and comfort, these 3 components (essential for well-being) should be built in at the design stage.
- i) Provide a good standard and quality of internal space, including room sizes, floor-to-ceiling heights, internal and external storage. Spaces should be accessible, flexible and adaptable to meet the changing needs of individuals and families.
- j) Create healthy living environments by providing adequate levels of natural lighting and sunlight, and good ventilation, avoiding the risk of overheating and/or noise/air pollution. Dual aspect homes (particularly on north facing plots/flatted blocks) should be provided.
- k) Be energy efficient and cost effective to run using passive design measures to harness solar gain, natural light and ventilation reducing the need for mechanical ventilation. Energy efficient materials/technology should form part of the external fabric and internal functions of the building(s).
- l) Provide access to generously sized, appealing and functional, private and/or shared amenity space; private gardens and balconies should provide a degree of privacy (striking a balance between views 'into' and 'out of'), shared terraces and courtyard spaces should be designed to encourage social interaction.
- m) Consider day-to-day operational requirements, applying attention to detail to waste storage and management, cycle storage, servicing and utilities, and ease of maintenance. The functional requirements should be designed-in at an early stage for ease of access and convenience and to minimise visual/environmental impact.

Relevant policy and guidance includes:

Local Plan – policies 4, 37 and 47

London Plan – objectives GG1, GG2, GG3 and GG4, and policies D3, D4, D5 and D6

NPPF – sections 11 and 12

Mixed-Use Development

- 5.93. Successful places require a mix of compatible **uses and activities** to provide **diversity, variety, and choice**. A mix of uses may be appropriate at a variety of scales: within a village, town/city, neighbourhood, street, or a particular building and can determine how active and vibrant a place is in supporting economic and social activity.
- 5.94. As set out in the NDG, successful communities require a range of local services and facilities to serve local needs and support everyday life. The correct balance of uses will help increase activity throughout the day, reduce overall travel, encourage sustainable travel, and support shops and services with a critical mass of people.
- 5.95. Mixed-use development is typically suited to urban locations and larger scale developments and can assist in achieving higher densities and intensive activity at locations which are easily accessible and have good access to public transport.
- 5.96. The benefits of mixed-use development include:
- Improving the vitality of an area with increased activity levels and street life at different times of the day/evening
 - Providing a feeling of increased safety through natural surveillance resulting from greater and more prolonged activity
 - Providing greater opportunity for social interaction/exchange
 - Creating a variety of buildings and spaces to engage visual interest and satisfy everyday functional needs – convenience and choice
 - Reducing the need to travel by providing a range of facilities in one place – providing a more sustainable pattern of development
 - Potential for greater energy efficiency and more efficient use of buildings and spaces
 - Introducing new uses/life into redundant buildings and spaces – providing greater resilience to change
- 5.97. Different uses have different needs, not all mixes are appropriate, the aim should be to **maximise synergy** and **minimise conflict**. Different uses need to be **compatible** in order to work well together and positively complement each other; they should be located in the right places with consideration given to **patterns of usage** and **movement**. How the different uses are serviced and supported is particularly important, where potential conflicts exist (access/noise/environmental impacts) careful consideration should be given to how these can be managed or designed out.
- 5.98. In the majority of mixed-use schemes, housing provision (and quality) remains the key priority. However, the growth of the innovation/tech economy, digitalisation, and the integration of services now provides greater opportunity for industry and housing to coexist. This change is reflected in the broadening of planning use classes to provide greater **flexibility**. Changing trends in retail (the creation of hybrid spaces and the experiential focus of retailers) will also influence the layout/structure of mixed-used buildings and their relationship with the street. The arrangement of different requirements (**spatial, structural, and functional**) is fundamental to the development of successful mixed-use typologies.



Figure 44 - Active ground floor uses: There are a variety of uses that can create an active ground floor. Consideration should be given to both vertical and horizontal mixed-use typologies



Figure 45 - Dickens Yard, Ealing: A high density, mixed-use scheme clustered around a transport node with active frontages and new public space. The scheme includes residential units, retail stores, cafes and restaurants, health, leisure and community uses.



Figure 46 - Flimwell Park, East Sussex: A sustainable mixed-use development in a rural setting comprising of a mix of uses including workspace, education, residential, restaurant and amenities. Environmental, social and economic sustainability were at the heart of the project.

Meanwhile Uses

- 5.99. Meanwhile uses and temporary ‘pop up’ interventions have become an important element of urban design which can contribute to the vitality and life of successful places. Temporary ‘meanwhile’ uses can transform empty unused spaces (vacant plots, development sites, Town Centre spaces) into opportunities for communities and businesses.
- 5.100. Meanwhile uses provide low-cost, low-risk opportunities for small enterprises, businesses, and community groups to engage with the local community, occupying vacant sites and/or bringing buildings back into short term use to help improve the physical and social landscape. Animating spaces through innovative design can enable conversations about the future permanent use of buildings/spaces and/or the wider redevelopment of an area to begin.
- 5.101. Types of meanwhile uses include food markets, workspaces, art installations and leisure activities. The council will encourage the use of temporary ‘pop-ups’ to function independently and/or as part of wider redevelopment proposals to stimulate interest and engagement in a particular area/parcel of land (creating ‘life’ between buildings).



Figure 47 - Blue House Yard, Haringey: A redevelopment and re-imagining of a disused car park site, the project combined creative maker space with public space, creating retail and workspace opportunities bringing activity and life to the yard throughout the day and evening.

DG8: Mixed-use development

All development should seek to achieve diversity and choice through a mix of compatible uses and activities that work together to create and support viable places. Mixed-use development proposals should:

- a) Consider the appropriateness of the setting (visibility, footfall, movement routes), floorspace requirements (vertical or horizontal mixed uses), patterns of usage (daytime and evening) and compatibility of uses/amenity impact (complementary and symbiotic).
- b) Avoid the creation of large areas of continuous/unrelieved single-use, unless it can be demonstrated that the use-block would not detract from the vibrancy of the area or that alternative uses are not viable.
- c) Provide active ground floor uses (shops, cafes, restaurants and bars) as well as considering community uses, studios and workshops to activate the public realm, with non-footfall dependent uses located at upper floor level.
- d) Consider multiple layers of mixed uses which involve different people using buildings/spaces at different times of the day/evening as well as various uses occurring in different parts of a building/space at any one time.

- e) Consider how the different uses and activities will be serviced and supported and how potential conflicts can be managed or designed out.
- f) Consider the amount and range of spaces required (floorplates) including the building structure (ceiling heights/volumes), and the importance of flexibility and adaptability (futureproofing) when proposing vertical/horizontal mixed-use typologies.

Relevant policy and guidance includes:

Local Plan – policies 4 and 37

London Plan – objectives GG1, GG2, and GG4, and policies D3, D4, D5, E1, E8, and E9

NPPF – sections 11 and 12

Non-Residential Development

- 5.102. Non-residential development refers to **industrial** and **commercial** use buildings and spaces, including warehouse storage and distribution centres, manufacturing plants and factories, research facilities, workshops and studio space, and commercial office buildings.
- 5.103. Industry and warehousing are important elements of the local economy, ensuring that SILs and LSISs are **retained and adapted** successfully to the changing needs of modern industry and commerce is a key objective outlined in the Local Plan. Safeguarding office accommodation for future business needs whilst encouraging improvements to existing stock and the **quality of environment** is also a key objective.
- 5.104. The design guidance below sets out the key principles which should be considered in relation to industrial and commercial development/re-development of existing buildings. Reference should also be made to the **contextual** and **responsive** sections of the SPD guidance in relation to context, heritage, layout, height, scale and massing, particularly in the case of finer urban grain/town centre locations.

Site layout and frontage

- 5.105. The layout of non-residential developments is particularly important to their function. The building footprint should be **proportionate** to the site and should address the street and public realm in a considerate and positive manner. **Active frontages** are important to the vitality of the streetscape; it is important to maximise the number of active frontages and to ensure that ground floor uses adjacent to the street have high levels of **visual permeability**.
- 5.106. On larger industrial area sites, building to the edge of the plot can create a more cohesive **street character**; a well-designed principal elevation can remove/reduce the need for perimeter fencing. Service yards should be located away from the street edge towards the middle or rear of the site. A continuous connection between the building and the street should be uninterrupted by large parking areas.

Movement and access

- 5.107. The location of pedestrian and vehicular **access points** and routes to and through the site is an important design consideration, circulation and vehicle management strategies should be designed to maximise pedestrian/cyclist safety and minimise conflicts. Access points should be clearly visible from the street with separate access for different uses/users segregating HGV vehicle movements from pedestrian/cycle routes.

Parking and servicing

- 5.108. Permissible levels of parking are set out in the London Plan, but car-free development should be the starting point for all development. Where parking is considered appropriate, parking areas should be located at the side or rear of the building in order to lessen the **visual impact** on the streetscape. For commercial office buildings, basement or under-croft parking should be provided whenever possible. Where parking areas are visible from the street, buffer landscaping and architectural screening features should be provided, such as tree planting, hedging, and decorative/gabion walls. Large parking areas should be broken into smaller blocks defined by landscaping.

5.109. The sharing of infrastructure, entrances and yard space should be considered in order to **optimise space** on smaller sites. The provision of shared HGV access and parking for units that only require occasional HGV access should also be considered.

Siting and design

5.110. The appropriate scale and massing of the development will depend on the **location** and existing **urban fabric** i.e. large coarse grain industrial areas, smaller self-contained industrial sites, or fine grain town centre commercial office sites.

5.111. In urban locations and mixed-use settings it is important to consider the impact on adjacent buildings particularly in relation to residential amenity. Development should be orientated to minimise overlooking of yard spaces (quality of outlook), seek to utilise roof lighting for industrial space to reduce the need for windows (overlooking), incorporate environmental protection/mitigation measures (noise/air quality), and use ancillary spaces (parking and storage areas) to provide a buffer between residential and industrial uses.

5.112. Commercial office development should seek to mitigate actual and perceived levels of overlooking and light pollution into adjacent residential properties/amenity spaces with appropriate design measures (i.e. louvred windows/facades treatments).

5.113. High quality commercial and industrial buildings can help to reduce environmental impacts when designed to the highest standards to reduce air pollution, noise and water pollution. Buildings which process or manage waste should be designed to high environmental standards and should be within a modern fully enclosed building to prevent amenity issues such as noise, odour and dust¹⁸.

5.114. Large commercial/industrial developments are often designed in a purely functional way resulting in generic/utilitarian buildings with limited architectural merit. The aim should be to deliver buildings of high quality that improve the urban environment.

5.115. Consideration should be given to building height, massing and use of materials in order to reduce the appearance of bulk/visual impact and to improve the **architectural language**. Careful consideration should be given to creating well-designed elevations with human scale elements which contribute positively to both the immediate setting and the wider surrounding context. More expressive external facades can break up long, relentless elevations as well as aiding the legibility of larger buildings; animating corners and entrances is key. Consideration should also be given to signage and graphics which should complement the design/function of the building.

Amenity and greening

5.116. Development proposals should seek to maximise opportunities for additional landscaping and public realm enhancement. The provision of outdoor amenity areas for employees is encouraged, this can be in the form of decked structures over shared yard space or roof terraces which can also contribute to urban greening. For industrial sites particularly, it is important to avoid creating tokenistic low-quality green strips on the edge of sites which can often become neglected unadopted spaces.

¹⁸ Details of Environmental Permitting Regulations are available from:
<https://www.gov.uk/guidance/waste-environmental-permits>

5.117. The greening of industrial sites with soft landscaping interventions, including tree planting to screen plant facilities and service yards, and reduce the need for unsightly security fencing which can appear austere and unwelcoming, is encouraged. The inclusion of green walls to provide visual amenity and support biodiversity should also be considered.

Flexibility and futureproofing

5.118. **Adaptability** and **flexibility** should be considered holistically throughout each stage of the design process, the benefits of which are particularly important in the context of large industrial/commercial buildings which can often become obsolete/redundant over time. Flexibility in unit configuration and size will ensure that buildings are best able to respond to changing future needs, while flexible internal layouts allow for varied occupiers and future adaptation.

5.119. Buildings should be designed to be both **flexible**, designed to allow for the easy rearrangement of internal spaces; and **adaptable**, with careful consideration given to how they could be structurally altered to accommodate new uses/patterns of use to prolong their lifespan.

5.120. The following factors should be considered in order to enable future adaptation and re-use; reference should also be made to the **Sustainable Design** (adaptability and resilience) section of the SPD guidance:

- **Scenario planning** – considering from the outset how buildings can be adapted to different uses if/when required.
- **Structural solutions** – providing clear floor plates, optimum floor-to-ceiling heights, service zones, structural grids and floor loadings that can accommodate different uses.
- **Space planning** – providing flexible spaces with generous floor-to-ceiling heights with good levels of natural daylight, and provision of external space.
- **Building form** – using simple plan form to allow for the reconfiguration of internal spaces and future expansion/contraction.
- **Sustainable design** – applying the principles of design for disassembly and modular construction; enabling building elements/components to be interchangeable for increased adaptability/re-use.



Figure 48 - Industria, Barking: Located on designated Strategic Industrial Land, Industria represents an innovative approach to design with an exemplar multi-storey industrial building in an area characterised by traditional single-storey ‘sheds’. Multi-level units are arranged around landscaped deck spaces creating a community of flexible manufacturing and making facilities; vehicular access to upper floors is provided by a helical ramp. The development features a shared central service yard, generous floor spans/ceiling heights and rooftop amenity space. The external facade features a planted green wall and large wayfinding signage.



Figure 49 - Here East, Stratford: The refit of the London 2012 Media Centre into commercial space for creative and digital industries was inspired by the light industrial factories and yards of neighbouring Hackney Wick. The aim was to make a series of huge buildings more social, dynamic and flexible with the potential to evolve. The original windowless facade was removed to create a glazed outer layer of flexible work, studio and commercial spaces around the perimeter - maximising natural daylight, ventilation and views. Education, employment and enterprise coexist behind colourful animated facades featuring projecting/inset balconies with bright orange metalwork, brise soleil, and solar dot patterned glazing. The combination of elements is effective in breaking down the scale of the building.

DG9: Non-residential development

All development should seek to make a positive contribution to the local economy and the quality of the built environment. Non-residential development proposals should:

- a) Provide a functional and efficient layout with an appropriate building footprint proportionate to the size of the plot and have a positive relationship with the street/public realm with active frontages and visual permeability
- b) Establish a clear movement hierarchy and circulation strategy to reduce pedestrian/vehicle conflict. Careful consideration should be given to the location of parking areas and service yards in order to minimise the visual impact on the streetscene
- c) Ensure that height, scale and massing is appropriate for the setting and the surrounding context in relation to townscape impact and the impact on neighbouring amenity/adjacent uses by considering:
 - Orientation of buildings and ancillary spaces
 - Glazing/fenestration design to optimise daylight/minimise overlooking
 - Environmental impact mitigation measures (extraction, ventilation, internal/external fabric specification, acoustic fences etc)
- d) Seek to improve the urban environment with an appropriate architectural language and well-designed elevations, facade treatment and signage
- e) Maximise opportunities for additional landscaping and urban greening to provide both functional benefits and visual amenity
- f) Ensure that buildings and spaces are futureproofed with an ability to adapt to different uses by considering structural elements, flexible internal spaces, building form and sustainable design principles from the outset

Relevant policy and guidance includes:

Local Plan – policies 37, 81, 82, 83, 84 and 85

London Plan – objectives GG1, GG2, and GG3, and policies D3, D4, E1, E4, E5, E6, E8, E9, T1, T5, T6 and T7

NPPF – sections 6, 11 and 12

Shopfront Design

5.121. The character and appearance of Bromley's local, district and town centre shopping streets contribute significantly to the distinctive character and identity of the borough as a whole. Shopfronts are an important element of local High Streets. Well-designed shopfronts can contribute positively to the streetscape both aesthetically and commercially, however, poorly designed shopfronts can negatively impact on the character, appearance and vitality of the street and its wider surroundings.

Key Design Considerations

5.122. It is important that traditional shopfronts with historic and/or architectural significance are retained, restored and enhanced with appropriate signage and materials. The design of modern shopfronts should be of a similar high-quality, integral to the building, and sympathetic to the setting.

5.123. It is important to consider the impact of a shopfront design on the building and adjoining buildings. The architectural character and style of the upper floors should be understood in order to ensure that the ground floor is not designed in isolation but as part of the overall composition.

5.124. It is also important to consider the impact of the design on the character and appearance of the wider streetscene. Proportions and materials should respect and maintain the rhythm and hierarchy of neighbouring buildings within the High Street.

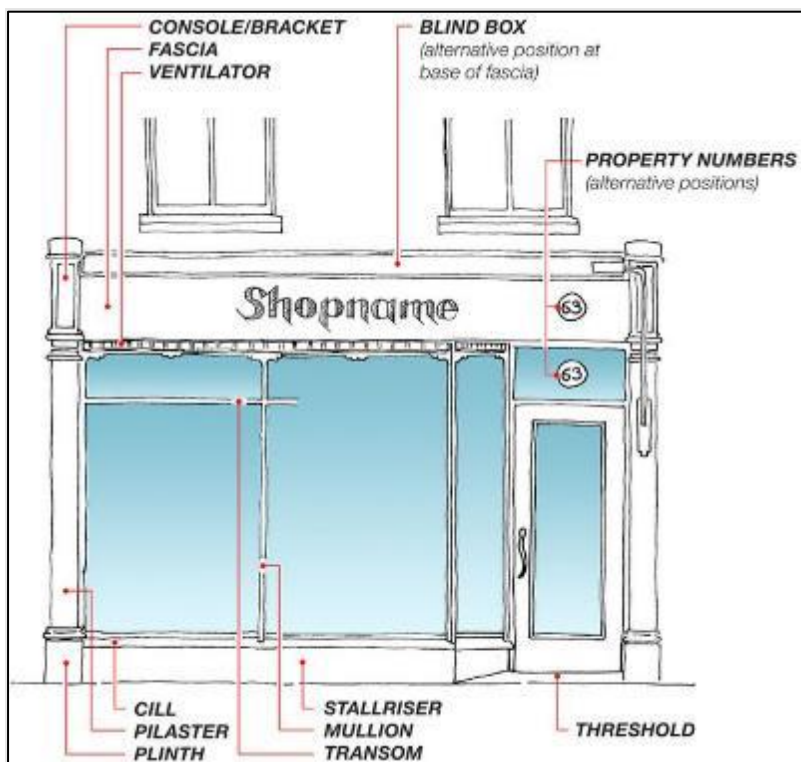


Figure 50 - key components of a traditional shopfront

Shopfront Types

- 5.125. Traditional shopfronts (mid to late 19th Century to the early 20th Century) are based on a classical design. This style was particularly successful in achieving harmony between the shopfront and the building as a whole. Traditional shopfronts are well proportioned and comprise of pilasters, cornel brackets, cornice, fascia, clerestory, and a shopwindow divided with mullion and a stallriser. Common materials used included brick, render and terracotta, and timber framed windows.
- 5.126. Modernist shopfront design (early to mid-20th Century) was influenced by various styles of the modernist era including Arts and Crafts, Neo-Georgian and Art Deco. A wider palette of materials was used including marble, steel, aluminium and chrome, and a more extensive use of glazing.
- 5.127. Modern shopfronts (late 20th Century onwards) are characterised by fully glazed aluminium framed frontages with contemporary lighting and signage. The shopfront design is often conceived in isolation with little consideration given to the relationship to the building as a whole or the wider streetscene. Their appearance is typically marred by bulky disproportionate fascias and unsightly security shutters and shutter boxes.

Retention of Original Features

- 5.128. The retention of architectural features of merit can help integrate a new shopfront into a building. The shopfront should not be considered as merely an insertion into the building.
- 5.129. Traditional features may have been removed from many shops, while others may be concealed by more recent alterations. Where original features no longer exist, it may be desirable to reinstate original features or replace with similar features. Any disfiguring later additions should be removed, damage repaired, and features reinstated with materials that are the same as, or match, the original.
- 5.130. The Council will resist the removal of shopfronts of architectural or historic merit. Where traditional features remain their retention and restoration will be encouraged. Existing Victorian or Edwardian pilasters, consoles and fascias should remain undisturbed, or be restored where altered.



Figure 51 - Sympathetic design respecting the original building fabric in Beckenham High Street



Figure 52 - The retention of original architectural features is key to safeguarding local character

Creating well-proportioned frontages

- 5.131. A well-proportioned shopfront that respects the character of the building is essential in ensuring good design is achieved. Elements such as doors, fascias and windows should be in proportion with both the building itself (including the character of the upper floors, scale, proportion and materials) and the general streetscene. This can be achieved by considering the design, scale and architectural style of the building, and by echoing the arrangement of windows, columns and upper floor facade treatment.
- 5.132. Fascias should be proportionate in size to that of the building facade and the shopfront. If large windows are necessary but otherwise out of scale, their impact can be reduced by subdivision. This can be achieved with mullions and transoms which can also help to relate the shopfront to existing architectural features at upper floor level.



Figure 53 - A well-designed shopfront respecting the character of the building and the streetscene

Maintaining Rhythm

- 5.133. Shopfronts spanning more than one property can disrupt the vertical emphasis of the host building(s) and the rhythm of the street frontage especially where the fascia is continuous. This can be avoided by reflecting the break between properties with pilasters.
- 5.134. Where buildings are similar in size and/or architectural style, complimentary designs will enhance the appearance of the street frontage by retaining a sense of continuity and coherence. Variations in the heights of fascias can detract from the rhythm of the buildings and the streetscene and should therefore be avoided.
- 5.135. Corner shopfronts have an important visual and functional role to play within the High Street, particular attention should therefore be given to the design of 'dual' aspect buildings which may relate to more than one frontage.



Figure 54 - Double shopfronts should reflect the break between properties by retaining pilasters

Shopfront Modelling

5.136. Unrelieved flat-fronted shopfronts can deaden streetscapes; in contrast, inset doors, bold architectural features and intricate detailing can provide depth and visual interest to the host building and the wider streetscene. Where traditional decorative thresholds and detailing already exists, these should be retained.

5.137. Windows and doors should reflect the character of the shopfront and the building itself. Shopfronts should comprise of a sizable shop window to provide animation and visual interest; large areas of opaque, frosted or mirrored glass should be avoided. Whilst large expanses of unsupported glazing may be suitable for modern shopfronts, this approach is inappropriate on traditional shopfronts and heritage assets. In most cases shop windows should be divided by mullions and transoms in response to the rhythm of the streetscape. Entrance doors including entrances to upper floors should be designed to harmonise with the overall shopfront design.

Using appropriate materials

5.138. The type of material used in a shopfront is an important element of the overall design. The choice of materials should be informed by, and reflect, the character of the building and its surroundings. Designs should not employ a large number of materials or use materials that visually clash with adjoining premises or detract from the general streetscene.

5.139. Particular care should be taken in the choice of materials for buildings within Conservation Areas in order to ensure that a sensitive and sympathetic design is achieved. Traditional materials such as brick, tile, terracotta, timber and masonry are typically more appropriate for shopfronts within Conservation Areas and on listed buildings.

5.140. In areas where modern shopfronts may be appropriate, materials should be similarly robust and of a high-quality. Synthetic materials such as anodised aluminium, acrylic, fibreglass, and UPVC are not acceptable. The use of high-quality materials is paramount irrespective of shopfront style (traditional or contemporary).

Cornices, Corbels, Pilasters and Stall Risers

5.141. A cornice should always form part of a traditional shopfront design. Existing historic cornice details should be retained or reinstated where missing. A cornice may incorporate a trough light where the projection is sufficient; this should be sited well below the upper floor window sills.

5.142. Corbels/Consoles are a feature of traditional shopfronts which help to visually terminate the top of pilasters; their design should reflect the level of detail used in other elements of the shopfront.

5.143. Pilasters are an integral part of shopfront design. Existing historic or traditional pilasters should be retained or reinstated where missing. Where pilasters form part of a new shopfront design, they should incorporate a base plinth and corbel/console bracket.

5.144. Stallrisers provide a solid base to the shopfront, reduce the dominance of glazing and help to visually balance the fascia and cornice above. In general, stallrisers should not exceed the base of pilasters or the depth of the fascia.



Figure 55 - *Examples of decorative corbels which feature on traditional shopfronts*



Figure 56 - A traditional shopfront stallriser

Fascias and Signage

5.145. Fascias form the dominant feature of the shopfront; they are key to advertising the business (visually) and distinguishing the ground floor of the building (functionally) from the upper floors above. The design of the fascia is an important part of the overall shopfront design and should:

- be of a scale proportionate to the rest of the building;
- not extend below the bottom of the corbel/head of the pilaster or above the perceived floor level below the first floor windows;
- not obscure windows or architectural detailing;
- not extend uninterrupted across a number of facades;
- protrude more than a depth of 0.15m to 0.25m;
- align with other fascias in the parade; and
- contain lettering that is proportionate in size to the sign dimensions.

5.146. Projecting box fascias should be avoided as they are unsympathetic to the style of most buildings in the borough due to their disproportionate size and bulk, and the materials used for their construction. Highly reflective signage on fascias should also be avoided. Non acrylic and matt finish materials should be used for fascia design on heritage assets.



Figure 57 - Proportionate well-designed fascia signage is a key element of good shopfront design

Projecting and Hanging Signs

5.147. Hanging signs are a traditional feature of shops which can positively contribute to the character of the High Street. However, too many hanging or projecting signs, installed at varying heights, can create a cluttered appearance and an unattractive streetscene.

5.148. Consideration should be given to the design and placement of hanging and projecting signs which should respect the character of the building and the wider setting. On traditional shopfronts and older buildings, timber or cast metal signs are particularly appropriate; individually crafted elegant modern signs, using other materials may also be acceptable.

5.149. Projecting box signs should be proportionate in size to the rest of the shopfront and be placed at fascia level; they are not appropriate in Conservation Areas or on listed buildings. As a general rule only one projecting sign per shopfront will be permitted. Projecting or hanging signs should not obscure architectural detailing.

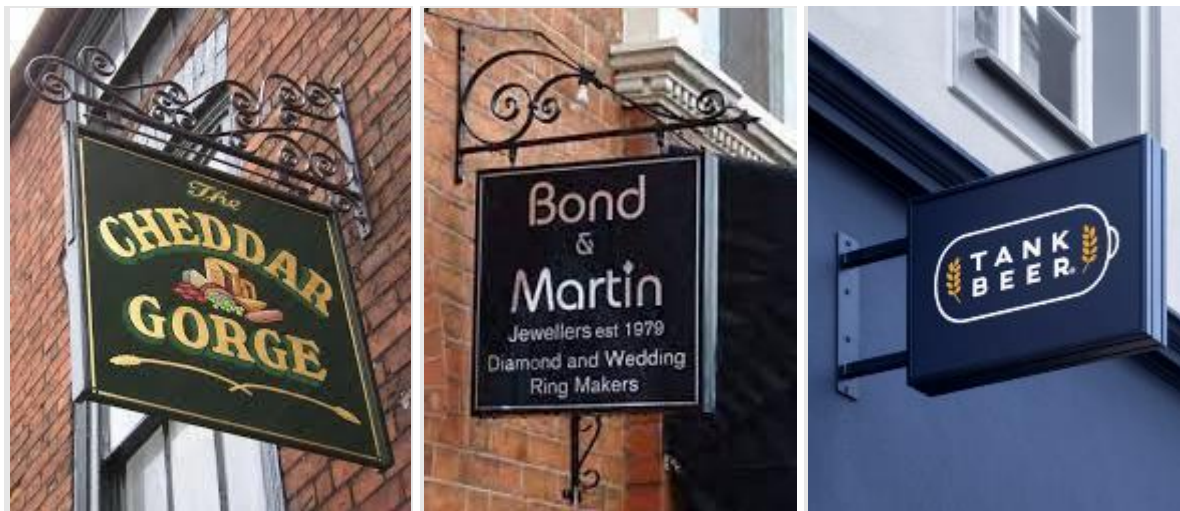


Figure 58 - Examples of well-crafted hanging and projecting signs

Corporate Identities

5.150. Standardised corporate shopfront designs are often not compatible with traditional shopfronts, particularly those on listed buildings and within Conservation Areas. Retaining local distinctiveness takes precedence over commercial uniformity; in some cases the corporate 'house style' will need to be modified and adapted in order to retain the integrity of the building itself and to preserve local character.



Figure 59 - Adapting corporate signage is key to preserving local character

Lighting

- 5.151. Modest and subtle lighting can improve the look and feel the High Street environment, whilst poorly designed lighting can have a negative impact. The type and design of lighting should be appropriate to the shopfront, building and the location.
- 5.152. Internally illuminated fascia signs are typically bulky and visually obtrusive and are therefore not considered appropriate in Conservation Areas or on listed buildings. Externally illuminated signs, individual backlit lettering or halo lighting create a more subtle effect and are preferable in most circumstances. In all cases, lighting should be considered as an integral part of the overall design.
- 5.153. Illumination should be appropriate to the context and the general character of the street as well as being discretely sited on the building itself. External light sources should be carefully directed to minimise light pollution for residents and should not cause a distracting glare for drivers. Intermittent flashing signs are not acceptable.

Canopies and Blinds

- 5.154. Canopies and blinds are primarily used to provide protection from the weather for shoppers; they can be an attractive addition to the shopfront and the wider streetscene if designed as an integral part of the overall shopfront design. They should be fully retractable and when retracted be fully concealed. The accompanying blind box should be fitted flush with, or behind, the fascia.
- 5.155. All canopies should be no less than 2.4 metres from pavement level once extended: but should not be fixed to the building any higher than ground level. Non-retractable canopies will not be permitted in Conservation Areas or on heritage assets.
- 5.156. Careful consideration should be given to the size, shape, colour and materials in order to ensure they are compatible with the character of the building and complimentary to the streetscene. Care should be taken to avoid obscuring architectural details, excessive amounts of advertising, unflattering colours or reflective materials. Canopies or blinds made from plastic will be resisted. Traditional Victorian style straight canvas canopies are encouraged. Continental 'Dutch' style canopies or those using folding supports are not acceptable.



Figure 60 - A fully integrated retractable canvas canopy

Security

5.157. Shopfront security is an important consideration; however, security features, if not well designed and integrated, can have a negative impact on the appearance of the street.

5.158. External solid/perforated metal shutters appear unsightly, prevent natural surveillance and attract graffiti; they can create an unwelcoming and hostile environment and should therefore be avoided. In cases where these are used, the shutter box housing should be integrated within the shopfront or behind the fascia.

5.159. Toughened glass is an ideal solution, providing security without the use of shutters, with no detrimental impact on the appearance of the streetscene. Toughened or laminated glass can provide high levels of security and has the capacity to remain intact when broken.

5.160. Internally fitted open mesh/lattice grille shutters provide a level of transparency to and from the street retaining an 'open' feel and appearance. These may be suitable where toughened glass cannot be installed or is not appropriate.

5.161. Burglar alarms should be sited as unobtrusively as possible and should not conceal architectural features or detailing. Arbitrary positioning of alarms should be avoided.

Accessibility

5.162. Shops should be fully accessible to all, including people with disabilities, the elderly and less ambulant, and those with prams or pushchairs. Inclusive design should be considered from the outset in order to create a safe and fully accessible urban environment.

- 5.163. New shopfronts and alterations to existing shopfronts should ensure level or ramped access is provided. Entrances should comply with Part M Building Regulations which set out statutory access requirements. Glazed entrance doors should be clearly distinguishable with visible manifestation to aid those with visual impairments. Efforts should be made to exceed minimum technical specifications wherever possible, removing barriers to access and inclusion through good design.
- 5.164. In the case of listed buildings and heritage assets, accessibility requirements should be accommodated as far as is practical to do so; measures should be commensurate with the need to preserve the character and integrity of the building and its setting.

DG10: Shopfront Design

Proposals for new shopfronts and alterations to existing shopfronts will be required to demonstrate a high standard of design. Careful consideration should be given to:

- a) The impact on the character and appearance of the host building, adjoining buildings and the wider streetscape; the style of shopfront should respect the character of the building and its setting;
- b) The retention, restoration and enhancement of original architectural features with appropriate materials and signage to safeguard local character and identity;
- c) Creating well-proportioned frontages which respond to the hierarchy of building and the rhythm of the streetscape in order to retain a sense of continuity and coherence;
- d) Using appropriate materials which should be informed by the character of the building and its surroundings. Materials should be robust and of a high-quality, and appropriate to the setting;
- e) The design of fascias and signage (size, placement, materials, lighting) which should be of a scale proportionate to the host building, and of a style/design in keeping with the shopfront, neighbouring buildings and the wider streetscene;
- f) The design of blinds, canopies and security shutters which should be appropriate to the character of the shopfront and safeguard the appearance of the street; and
- g) Ensuring accessible design to enable access and inclusion for all users.

Relevant policy and guidance includes:

Local Plan – policies 37, 41 and 101

London Plan – objective GG1, and policies D4, D5, E8 and E9

NPPF – section 12

Landscape

- 5.165. Landscape refers to the character, appearance and functional qualities of open space, including its shape, form, ecology, natural features, and/or man-made elements, and the way these combine. Understanding the **relationship** between buildings and spaces is central to good design; the quality of landscape and built-form architecture are of equal importance and should support and complement each other both **visually** and **functionally**.
- 5.166. Landscape design is a key component within any scheme regardless of scale or location and comprises a number of elements including structural planting, paths, drainage, boundary treatments, water features, seating, play, lighting and public art. The design of these elements can have a transformative effect. In addition to considering the merits of new interventions it is also important to recognise and retain the value of existing landscape qualities and their importance to local identity and place attachment.
- 5.167. Many successful schemes adopt a **landscape-led approach**; considering landscape as the **starting point** to inform the layout of buildings rather than the other way around. Key to this approach is prioritising spaces and routes for people and nature and using green infrastructure as a key structural element in how schemes are planned and designed. Understanding the existing landscape and its intrinsic characteristics will almost certainly influence the way in which a site's potential is understood – often providing greater integrity and meaning to the layout of a scheme.
- 5.168. For all development proposals it is important to develop a clear **landscape strategy** at an early stage in the design process, considering the intended use and function of the space(s) being created, structure and hierarchy, maintenance and management, all of which will inform the choice and treatment of individual elements (detailed design). It is important to note that the quality of landscape, its **connection**, **contribution**, and **clarity** in relation to the scheme as a whole is as important, if not more so, than the overall quantity of space provided.



Figure 61 - South Gardens, Elephant Park: Includes a series of courtyards, communal roof gardens, and biodiverse roofs, the aim was to create a liveable, engaging, and playful landscape with intrinsic ecological value.

Structure

5.169. The pattern of any new development should evolve from the existing topography, natural assets and ecological features of the site and its surroundings. Development proposals within/adjacent to Green Belt, Metropolitan Open Land, or within rural parts of the borough will be required to adopt a landscape-led approach in order to ensure that scheme layouts evolve from the existing environmental features and natural characteristics of Bromley. Built form should have a positive relationship with open space, i.e. by framing, fronting and/or connecting spaces.

Function

5.170. The landscape design should support the intended use and function of outdoor space(s) which will influence their scale and character, and the choice of materials used. Outdoor spaces should be designed to be high-quality, robust and adaptable over time in order to remain appealing, usable and fit for purpose. Variety, adaptation and flexibility are important elements of place; spaces can adapt to activities, and activities can adapt to space. It is important to enable different uses by people of different ages and at different times of the day to coexist, i.e. accommodating passive quiet spaces to relax alongside more active spaces for play and exercise. Development proposals should seek to create a range of accessible spaces of different sizes that encourage activity and promote health, well-being and social inclusion.



Figure 62 - St Andrews, Bromley by Bow: A green network of public and semi-private open spaces creates a neighbourhood feel around a series of playable streets and communal courtyard spaces, with larger public spaces located to the west and north of the site.

- 5.171. The siting of playspace should be informed by aspect and environmental conditions (influenced in-part by built form) in order to be usable, and the surrounding context to ensure that disturbance to neighbouring residents is minimised. Playspaces should be designed to inspire children of different ages: providing safe, inclusive and engaging spaces, incorporating natural landscape features to encourage both formal and informal play.
- 5.172. All open spaces should have a function and purpose; creating undefined areas, awkward or 'left-over spaces' without overlooking or a clear function or sense of ownership risk being unused and often become subject to neglect.



Figure 63 - South Gardens, Elephant Park: Incorporating informal doorstep play along the pedestrian route.



Figure 64 - Camden Courtyards, Camden: Utilising communal roof terraces to provide additional playspace.

Nature

- 5.173. As stated in the NDG, nature contributes to the quality of a place, and to people's quality of life, and is a critical component of well-designed places. Access to nature and green space has proven benefits for physical and mental health and well-being. Trees and planting offer more than just visual amenity; incorporating natural features including trees, planting and water contributes to quality of place supporting biodiversity, air quality, cooling and shading, and water management – providing climate change mitigation and resilience.
- 5.174. Development proposals should therefore seek to maximise opportunities to incorporate natural elements within the landscape design, considering both the wider and local context including existing landscape features and ecology, and the potential to contribute to a wider green infrastructure network and/or green corridors as part of an integrated, cohesive joined-up approach.



Figure 65 - Aberfeldy Village, Tower Hamlets: A new linear park sits at the heart of the neighbourhood, with open lawns and varied playspaces, lined with trees and seasonal planting. The park is part of the sustainable drainage system and biodiversity strategy, which was developed with the London Wildlife Trust to ensure the new landscape fosters a broad range of species. A continual swale runs along the full length of the park with steps facing south, providing informal seating.



Figure 66 - Cator Park, Kidbrooke Village, Greenwich: Working in collaboration with the London Wildlife Trust a landscape-led approach supports the green infrastructure network beyond the site boundaries providing flood mitigation measures and water management. The high quality biodiverse parkland provides a natural setting for the development supplemented by a range of private and semi-private amenity spaces.

- 5.175. Most development sites, even very small or constrained sites with limited scope for landscaping, can provide opportunities for biodiversity enhancement through careful and well thought out design. Landscape proposals should seek to retain, enhance and create habitats and features of ecological value wherever possible. Landscape elements can include trees, native plants, hedgerows, wildflower grassland, swales and ponds. New landscape features can help to achieve biodiversity net gains as well as contributing to existing and future Nature Recovery Networks (NRNs) for nature such as linking up tree, hedgerow and wildlife corridors on and off site.
- 5.176. New development will be expected to provide artificial nesting opportunities for birds and roosting/hibernating opportunities for bat species by incorporating bat bricks, swift bricks, and bird boxes where appropriate. Swift bricks provide a universal nest brick for a wide range of small bird species; they are integrated within the building design and do not require maintenance. Swift bricks should be installed in accordance with best practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM). Other measures to encourage and provide habitat for important pollinator species should also be provided.
- 5.177. The provision of native plant species within new development helps to improve biodiversity. Native plants should be given primacy in terms of importance when considering planting schemes, particularly those adjacent to areas of important habitat. Applicants should avoid selecting cheaper or readily available landscaping plants that offer little in terms of variety and biodiversity enhancement. Planning conditions relating to landscaping in Bromley are likely to require a minimum of 30% native plant species of home grown stock and no invasive species. Further details of native species, specific enhancements and biodiversity net gain opportunities can be found in the Bromley Biodiversity Plan¹⁹.



Figure 67 – Examples of artificial nests: swift bricks and bee bricks can be of particular benefit in an urban context

¹⁹ <https://www.bromley.gov.uk/downloads/download/167/bromley-biodiversity-plan>

DG11: Landscape Design

All development proposals will be expected to deliver high quality landscape design, creating attractive, functional and engaging spaces that will endure over time.

Development proposals should:

- n) Demonstrate a clear relationship between buildings and spaces, ensuring that the quality of landscape and built form architecture support and complement each other both visually and functionally.
- o) Establish a clear landscape strategy at the beginning of the design process considering the intended use of the space(s) being created and the elements within, including structure, function, nature, management and maintenance.
- p) Where appropriate, adopt a landscape-led approach, understanding and responding to existing landscape characteristics and features, using green infrastructure as a key element in site strategy, planning and design.
- q) Encourage outdoor activity and social interaction through the design and layout of external spaces giving careful consideration to scale and character, choice of elements and materials used. All spaces should be robust, adaptable, inclusive and accessible to all.
- r) Include a variety of spaces to enable different uses at different times of the day, accommodating passive quiet spaces and meeting places alongside more active spaces for exercise and outdoor play.
- s) Maximise opportunities to incorporate natural elements, habitats and features of ecological value on-site, and explore opportunities to contribute to existing wider green infrastructure networks off-site to deliver biodiversity net gain.

Relevant policy and guidance includes:

Local Plan – policies 37, 68, 69, 70, 71, 72, 73, 74, 75, 77, 78 and 79

London Plan – objectives GG1 and GG3, and policies D3, D4, D5, G1, G5, G6 and S4

NPPF – sections 12 and 15

Public Realm

- 5.178. The public realm can be defined as the space between and within buildings that is publicly accessible, including streets, squares, parks, open spaces, terraces and sky gardens. It should be seen as a series of **connected routes and spaces** that help to define the character of a place.
- 5.179. The public realm has both physical (space) and social (activity) dimensions, facilitating **ease of movement** and **social interaction**. A functional, safe, attractive and accessible public realm can enhance people's quality of life and perception of place.
- 5.180. Bromley is valued for its built and historic environment of which the public realm plays an integral part, physically, socially, and functionally. There is an opportunity to further enhance the quality of existing streets and public spaces (as well as creating new ones) at a local level and as part of a wider spatial strategy for the borough.
- 5.181. Development should seek to make a positive contribution to '**quality of place**' and **public life** by creating an engaging public realm that supports a variety of activities, promotes health and well-being, and encourages social interaction and civic inclusion. Public spaces should feel safe, secure, and attractive for all to use. Bromley is recognisable for its tree lined streets and green open spaces; development proposals will be expected to supplement and enhance this enduring character.

Principles for delivering high quality public realm

Legible

- 5.182. Legibility is key in determining if, when, and how, a piece of public realm will be used. Public spaces should be clearly delineated from private spaces, as ambiguity and uncertainty can result in spaces being avoided or underused. The use of public space should be intuitive. Public spaces which have a clear **identity** and intended use, are easily **accessible, well overlooked, and integrated** into the surrounding urban fabric are likely to be more successful. Conversely, ambiguous spaces located out of sight or adjacent to ground floor residential units in flatted developments can feel 'private' and deter use. Materials and boundary treatments are key.



Figure 68 - Jubilee Square, Leicester: *The civic space provides a gateway into the city centre as well as being a destination in its own right for recreation, festivals and events. Key pedestrian desire lines and visual axes were mapped to provide clear legible routes transforming local connectivity.*

Engaging

5.183. The design of the public realm should be planned in a strategic manner and should respond to the functional and social needs of its users. It should be **innovative** and **engaging**, generating interest and encouraging a variety of activities and uses. The uses should be appropriate for the location and the surrounding context (i.e. a busy active hub or a quieter tranquil space) complementing rather than competing with surrounding land uses. The design of public spaces should be **distinctive, attractive, user inspired** (people focused) and **context driven** (meaningful) rather than replicating a generic approach adopted elsewhere.



Figure 69 - Pancras Square, Kings Cross: Designed to frame key views and provide respite from the surrounding city with lush planting and a cascading water feature, the layout accommodates spaces and routes that allow a range of activities for all users, providing an attractive setting with inclusive, useable sub-spaces.



Figure 70 - Town Square, Barking: *Comprising of 4 key elements; a civic square, arboretum, folly wall, and an arcade, the eclectic mix of landscape and art encourages users to engage with the space. The civic square hosts a range of festivals and events and is connected to the main shopping street via a terrazzo tiled colonnaded arcade. An arboretum containing 40 mature trees arranged to create settings of different scales and character includes informal woodland play structures, seating, drinking fountains and ambient lighting.*

Social

- 5.184. Well-designed spaces create a connection between people and place; providing **meeting places** for relaxing or engaging in activities, places to 'stop and stay' where there is an 'invitation to be'. When designing public spaces it is important to consider the desired experiential outcomes and how the physical framework will generate and support (rather than prevent or impede) **social interaction**.
- 5.185. Developing a hierarchy of different size spaces with a different character and purpose can be successful in attracting different types of users with different needs. The provision of amenities which support outdoor stays (shade, shelter, seating) and the consideration of microclimate conditions also play an important role. The siting and design of individual elements should be integral to the scheme; detailed design is key.
- 5.186. The interface between the built form and open space ('exchange zones'), human scale, spatial contrasts, sequencing of spaces, and the transition between public and private space all require careful planning in order to support 'life between buildings'.



Figure 71 - Granary Square, Kings Cross: Designed to be the active heart of the Kings Cross masterplan, the square hosts a range of arts and cultural events with a year-round programme of activities. At the centre of the square are four banks of fountains which animate the space. Sub-spaces include wide, south facing steps framing the edge of the Regent's Canal for sitting and relaxing.

Fit for purpose

5.187. Public spaces should first and foremost be fit for purpose and suitably robust in order to accommodate the intended uses(s) and withstand the demands being placed on them. Pedestrian movement, **quality and durability of materials**, and long term **management and maintenance** requirements should be considered from the outset.

5.188. Caution should be applied when creating spaces that have to work too hard, i.e. cluttered spaces which attempt to be ‘everything to everyone’ with numerous competing and/or incompatible elements. The user should be the starting point for all public realm design; spaces which prioritise key functions and deliver simple objectives are often more successful than complex schemes which are over ambitious and over-designed.



Figure 72 - Church Gardens, Chipping Barnet: A simple, robust intervention with the aim of improving local connectivity, opening up views of heritage assets and providing a green space in the heart of the town centre. The scheme features a terraced public space with Corten steel planters and an innovative seating design.

Adaptable

5.189. Well-designed spaces are able to **adapt and change** over time, accommodating new or shared uses in response to changing demands and circumstances. Public spaces should be able to adapt to different uses and activities at different times of the day, week, month or year (i.e. street markets, programmed events, and meanwhile ‘pop-ups’), with spatial elements designed to serve more than one purpose where there is scope to do so. Robust design solutions are more likely to stand the test of time providing greater **resilience** against unpredictable social, environmental and technological change.



Figure 73 - Old Market Square, Nottingham: Designed to be fully accessible, inclusive, and robust using high quality materials, with water features and flexible performance space to encourage 24 hour use. The design has transformed the city's historic square creating a flexible and adaptable space which accommodates a range of events, markets, and community activities.

DG12: Public Realm

The quality of public spaces across the borough contributes positively to Bromley's distinctive character and identity. Design proposals for new and existing publicly accessible spaces should:

- a) Respond to existing routes, connections, and surrounding buildings; providing inclusive access, ease of movement, and active frontages to define and animate the space
- b) Create an attractive and engaging public realm for people of all ages that encourages social interaction with a variety of activities and uses through the use of high-quality materials/soft landscaping and range of formal and informal spaces which relate to the local context
- c) Ensure high levels of passive surveillance with well overlooked spaces with appropriate lighting to provide safe and secure environments without the need for additional security measures
- d) Co-ordinate and consolidate elements of street furniture including seating, bins, bollards, cycle stands and signage to improve legibility and remove visual clutter
- e) Incorporate green infrastructure (trees, planting, SUDs) to help mitigate environmental conditions and consider microclimate effects (influenced by layout, orientation, and scale of buildings) in order to create a comfortable environment which encourages rather than deters use of the space(s)
- f) Consider the on-going management and maintenance of the spaces being created as part of the design strategy including the cost, durability, and sustainability of materials. Adaptability and resilience should be designed-in from the outset

Relevant policy and guidance includes:

Local Plan – policy 37

London Plan – objectives GG1 and GG3, and policies D4, D5, D8, G1, G5, G6, G7 and T2

NPPF – section 12

Public Art

- 5.190. Public art can make a significant contribution to public spaces with the ability to increase the **distinctiveness** of a place, transforming a previously anonymous space into a unique and memorable one. Successful public art is informed by its **context** (history, geography, or culture) resonates with residents and visitors, and reinforces **local identity** and **sense of place**.
- 5.191. Public art can be integrated into a new development, within a building structure or a public open space; it can take many forms including sculptures, murals, signage, lighting, street furniture, paving, sound/media and performance. It can be permanent or temporary. All public art installations, standalone interventions and/or those which form part of larger development sites, should be specific to the site and relate to the social and physical context of its surroundings and the communities they serve.
- 5.192. Incorporating public art provides opportunities for local artists, schools, colleges, and community groups to be involved in the design of the public realm and the elements within it. Early **engagement and collaboration** with the local community, special interest groups, and artists is key to ensuring a greater sense of connection between people and place – both visually (stimulating interest and engagement) and functionally (street furniture and landmark wayfinding). The involvement of local residents in the design and delivery of public art projects will therefore be encouraged.



Figure 74 - Folly Wall, Barking: The folly wall frames the edge of the town square screening a supermarket. Comprising of architectural salvage, the folly is intended to mark the cycle of regeneration picking up on the historic context of Barking. Local college students were involved in the design and build of the structure.



Figure 75 - Nelson's Ship in a Bottle, Greenwich: A scaled down replica of HMS Victory with bright patterned sails, the artwork is intended to be a celebration of London's many cultures and ethnicities. The installation provides a focal point outside the National Maritime Museum.

5.193. Public art is not restricted to monuments and sculpture, installations can fulfill several different functions at the same time and can play an important role in the design of public spaces by encouraging people to 'stop and stay' and use the space. Furniture installations can provide new opportunities for spontaneous meeting, social interaction and 'eyes on the street', they have the capacity to inspire and delight by challenging the way we interact and engage with the public realm.



Figure 76 - The Parklet Bench, Tooley Street, London Bridge: A temporary installation providing a micro-green space designed to raise awareness of air pollution in London. The unique design creates a source of urban greening alongside functional seating which aims to encourage chance interactions through its innovative zig-zag design.

5.194. Public art can also positively respond to the process of regeneration by stimulating interest and community involvement, as well as visually enhancing redundant spaces pending redevelopment or improvement.



Figure 77 - Anderston Station, Glasgow: A temporary public artwork at the entrance to Anderston Station designed to improve pedestrian and cyclist wayfinding, and revitalise the public space ahead of the COP26 summit. Embracing art as a low-cost strategy to activate streets, pavements, and transport infrastructure – working with artists and local community groups.

Connected

Movement

- 5.195. Connectivity and **ease of movement** directly influence how places function and feel. Promoting accessibility and local permeability by creating places that are easy to get to and move through is a key urban design objective.
- 5.196. As set out in the NDG, **patterns of movement** for people are integral to well-designed places, they include walking and cycling, access to facilities and employment, parking and the convenience of public transport. A permeable, connected network of routes for all modes of transport **integrated** into the public realm is key to creating **sustainable** neighbourhoods and healthy **connected** communities.
- 5.197. Bromley has good public transport accessibility in the more densely populated urban areas contrasting with poorer provision elsewhere, consistent with the rural nature of a large part of the borough. The location of new development can positively influence existing movement patterns, removing barriers and facilitating change. Development should be concentrated in sustainable locations and seek to maximise opportunities to improve local permeability and wider connectivity.
- 5.198. Larger scale development proposals should seek to establish a clear layout and hierarchy of streets and spaces, ensuring that new routes connect to existing, are functionally efficient, accessible to all, and contribute to local character and place. Development should prioritise pedestrian movement and promote active sustainable modes of travel. Large developments should also provide appropriate infrastructure to future proof development, for example provision of new cycle lanes²⁰.

²⁰ Further guidance on infrastructure is provided in the Planning Obligations SPD.

Streets

Street Network

- 5.199. Connected **street networks** form the basis of well-designed places providing a hierarchy of functional, safe and accessible routes and spaces for pedestrians, cyclists and vehicles. In a well-connected street network each street has more than one connection to another, there is permeability for different users, and walking distances are reduced. New street networks should be designed to ensure that permeability is maximised for pedestrians and cyclists, and carefully managed for motor vehicles.
- 5.200. The movement structure should be defined at an early concept stage as it will form the basic framework for the location of buildings and spaces. When considering the redevelopment of a site it is important to assess the street pattern beyond the site boundary, identifying key links, origins and destinations. New development should respond to and connect with the established street form.
- 5.201. Cul-de-sacs are a predominant feature of some parts of the borough; however, they can create introverted layouts which fail to integrate with the surrounding streets. Cul-de-sacs will only be considered acceptable if they form part of a wider well-connected network.



Figure 78 - Connected Street Networks: A connected network of streets reduces walking distances

Streets as Places

- 5.202. Streets make up most of the public realm and are the longest lasting of all the built form elements. Streets are how we access and experience places and are therefore key to placemaking.
- 5.203. As stated in Manual for Streets (2007) the **place function** of streets is essentially what distinguishes a street from a road. A street has important public realm functions beyond the movement of traffic. It is important to recognise the dual function of streets; **highway link** – movement corridor (design objective to save time), and **place** – a destination in its own right (design objective to spend time).
- 5.204. **Place** should not be considered subservient to **movement**; both should be considered in combination. It is only by considering both aspects that the right balance will be achieved. It is important to develop a clear understanding of context and function which will in turn reflect the character of the street, influencing the degree of user separation, choice and quality of materials, and the extent of street furniture, planting and landscape.



Figure 79 - Exhibition Road, Kensington: A shared surface approach with a single level surface from building face to building face along the entire length of the road. Within this single surface the needs of the pedestrian, cyclist, motorcyclist, car, taxi, delivery vehicle, and bus have been carefully considered. Changes were made to the surrounding road network to reduce through traffic and enable mixing of pedestrians cyclists and vehicles. The diagonal paving pattern reflects the movement of people from one side of the street to the other.

5.205. Development proposals should establish a clear **user hierarchy** putting pedestrians first, followed by cyclists, public transport use, and finally private motor vehicles. Attractive, well-designed streets encourage more people to walk and cycle to local destinations, improving health and well-being while reducing vehicle traffic and pollution. The provision of appropriate seating, shelter, clear signage and attractive landscaping encourages people to stop and stay, increasing social interaction and supporting local daytime and evening economies.

5.206. Streets should be designed to build and strengthen the communities they serve, meet the needs of all users by embodying the principles of inclusive design, form part of a well-connected network, and be safe and attractive with their own character and identity.



Figure 80 - Hornchurch Town Centre, Havering: A key feature of the scheme was a focus on improving pedestrian permeability. This was achieved by removing guardrails, placing crossings on desire lines, increasing the width of the footways and implementing a continual central pedestrian crossing strip. The scheme also improved social spaces through planting, new lighting, wayfinding and street furniture. Traffic flow was also improved, bus stops were made fully accessible, and better provision for cycling was installed.

Legibility

5.207. Legibility is a measure of the **clarity** and ease with which townscape, buildings, routes and spaces are **understood**. People feel more comfortable in places which are legible and have a clear structure making it easier to move around. Legibility relates to both the coherence of physical form (identity/image) and the influence this has on movement patterns (mental mapping/wayfinding). Formlessness creates uncertainty and confusion, whereas clear identity and meaning provide recognition and assurance.

5.208. Development at all scales should contribute to creating a legible environment by providing and reinforcing **clear layouts**, routes and connections, and enhancing **visual links** to existing landmarks, gateways, and focal points (or creating new ones)

to ensure that the relationship between the site and the wider setting is clearly understood.

5.209. Opportunities to aid **wayfinding** should be identified at an early stage and used to influence the movement network. Site topography, skyline, key views, sightlines, and landmarks (memorable buildings and landscape features) should all be considered. A clear understanding of the local context should influence the layout of streets and movement corridors, focal points should be created where they can aid legibility, typically at corners, junctions, or gateway locations to indicate access or particular use.

5.210. Development should ensure that the intended use/function of buildings and spaces (functional importance and spatial character) are easily recognised and understood including clearly visible entrances and thresholds. Development proposals should seek to reinforce **visual connections** along routes and between spaces and at landmark locations, with appropriate landscaping, lighting and signage. Incorporating memorable elements of public art and/or bespoke public realm can contribute to an area's **character and identity**.



Figure 81 - Elwick Road, Ashford: The transformation of an existing one-way three-lane road, applying a shared space philosophy, into a two-way street. The scheme creates a more permeable link from the station and town centre to a southern expansion area. The paving design references the Stour River, it provides a 'natural' demarcation between the vehicular and pedestrian zones and creates a visual and functional link that ties the town centre to the station and further afield to the river.

DG13: Movement and Legibility

All development should promote accessibility, legibility and ease of movement both within the site and beyond its boundaries by:

- a) Establishing a clear hierarchy of streets and spaces which should prioritise pedestrian movement, respond to key origins and destinations, and reflect natural desire lines and existing movement patterns
- b) Ensuring that new routes connect into existing routes as part of a coherent street network to improve local permeability and wider connectivity, and enable efficient, inclusive, interfaces between different modes of transport
- c) Creating attractive legible streets and spaces which promote activity and social interaction recognising the dual function of streets: movement corridors and public realm *places* – prioritising active streets and *meeting places* over sterile transient routes
- d) Enhancing local character and place with natural elements, street trees, and green infrastructure to soften the impact of car parking, improve air quality and achieve biodiversity net gain
- e) Creating places that have a clear image, are memorable and easy to understand; providing legible routes and connections, reinforcing visual links to existing landmarks and focal points, and utilising opportunities to improve wayfinding for greater ease of movement and sense of place

Relevant policy and guidance includes:

Local Plan – policies 33 and 34

London Plan – objectives GG1 and GG3, and policies D5, G1, T1, T2, T5 and T6

NPPF – sections 8, 9 and 12

Inclusive

Inclusive Design

5.211. **Inclusive design** is about making places everyone can use with dignity, comfort, and choice; creating environments which avoid separation and segregation, acknowledge diversity and difference, and which enable everyone to participate **equally** and **independently** in everyday activities.

5.212. Inclusive design is integral to good design; by adopting an inclusive design approach, many of the barriers that create undue effort and hardship experienced by those with disabilities, older people, and/or families with small children can be avoided or designed out.

5.213. The principles set out below are taken from CABE best practice guidance; these principles are at the heart of inclusive design and should be followed in the planning and design of future development²¹.

- **Inclusive** so everyone can use them safely, easily and with dignity.
- **Responsive** to peoples wants and needs through meaningful engagement.
- **Flexible** so different people can use spaces in different ways.
- **Convenient** ensuring ease of use without undue effort or separation.
- **Accommodating** for all; regardless of age, gender, mobility or ethnicity.
- **Welcoming** with no disabling barriers that might exclude some people.
- **Realistic** offering more than one solution to help balance people's needs and recognising that one solution may not work for all.

5.214. Inclusive also means that the planning and design of new development is informed by meaningful **public engagement**, reflecting the wants and needs of the local and wider community including hard-to-reach groups. It is important to recognise that consultation (being informed) is not the same as engagement (active participation); it is imperative that all parts of the community are actively involved in the design process in order to ensure that all needs and requirements (physical and social) are considered.

5.215. An **inclusive design approach** should form a key part of the design process and be considered from the outset to ensure that development proposals prioritise accessibility, equality, social integration, and community cohesion.

Housing Mix

5.216. As outlined in the NDG, successful neighbourhoods contain a rich mix of people, including families and the elderly, young people and students, people with physical disabilities and those with mental health needs. A **variety** of housing tenures, type, size, and construction is therefore required. Achieving the right mix will help to create **diverse, equitable** and **resilient** communities.

5.217. Development proposals should provide a mix of tenures, types and sizes and adopt a **blind tenure/tenure neutral** approach – where there is no distinction between the

²¹ The Principles of Inclusive Design, CABE, 2006

visual appearance and general location of different tenures. Options for mixed tenure housing include fully mixed, pepper-potted, segmented and clustered layouts; the layout is often dependent upon the housing typology and management requirements. Applicants will be required to demonstrate a clear rationale for the chosen model.

- 5.218. Mixing tenures promotes **social diversity** and **inclusion**; development proposals should seek to maximise the potential for social interaction within the layout, form, and appearance of buildings and spaces, avoiding features which create actual or perceived barriers or contribute to segregation. Flatted developments should include shared entrance cores and ensure that communal facilities are available and accessible for all residents. It should be noted that mixing tenures by whole building rather than by stair cores rarely achieves an acceptable degree of mixing; visual appearance/identical facades should not be used to mask complete tenure segregation – which misses the point of integration and inclusion.



Figure 82 - Buccleuch House, Clapton: A mixed-tenure development providing homes for three different communities; first time buyers, Orthodox Jewish families and older people who need extra care. The design creates one unified building with very little difference externally across the three tenures except for subtly different balcony types designed with the practical and cultural requirements of the residents in mind.



Figure 83 - Kings Crescent Estate Phases 1 & 2, Hackney: A local authority-led development involving intensive consultation with residents and local people who helped to define all aspects of the scheme including the planning of streets, internal layouts and material specifications. Three courtyard buildings combine existing and new blocks with shared amenity spaces and dual aspect entrance lobbies featuring the same level of design quality regardless of tenure.

5.219. Design and Access Statements submitted as part of the planning process should incorporate inclusive design principles that are demonstrably based on the site conditions, public engagement, technical standards, policy, and best practice guidance. Inclusive design principles should be agreed as early as possible to ensure that they are appropriate and deliverable.

5.220. The Design and Access Statement should clearly demonstrate how the specific needs of different user groups have been integrated into the development proposal. This might include illustrating how convenient the key routes from the application site to local community facilities are, for several different user groups.

DG14: Inclusive Design

Development proposals should achieve the highest standards of accessible and inclusive design by:

- a) Undertaking meaningful engagement with the local community, relevant user groups and equality groups; to inform inclusive design principles.
- b) Using best practice standards and design guidance; to inform inclusive design principles.
- c) Applying the inclusive design principles throughout the design development, illustrating how the inclusive design approach is incorporated into the final design by:
 - i. Providing high quality people focused spaces that are designed to facilitate social interaction and inclusion.
 - ii. Providing independent access without additional undue effort, separation or special treatment that convenient and welcoming with no disabling barriers.
 - iii. Providing a consistent level design quality across tenures to support social integration.
 - iv. Incorporating safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
 - v. Prioritising inclusive elements of the development proposal in the maintenance and management plan, including fire evacuation procedures.

Relevant policy and guidance includes:

Local Plan – policies 4, 37 and 47

London Plan – objectives GG1 and GG3, and policies D4, D5, D6 and D7

NPPF – sections 8 and 12

Designing Out Crime

- 5.221. Crime and fear of crime can have a significant impact on individual and community well-being and quality of life. The design and layout of new development can directly influence levels of crime and anti-social behaviour. Successful places feel **safe and secure** for residents and visitors; conversely, poorly designed environments can negatively impact quality of life, particularly for vulnerable groups.
- 5.222. '**Designing out crime**' refers to the design of the physical environment in a way that positively influences the well-being of its users, i.e. by providing safe movement routes, increasing activity levels and natural surveillance, and/or creating a sense of ownership thereby reducing opportunities/incentive for crime to take place.
- 5.223. '**Secured by Design**' is a UK initiative endorsed by the Metropolitan Police which aims to support this overriding objective by encouraging the adoption of specific crime prevention measures in the design of new development²². Applicants are advised to engage with the Metropolitan Police during the pre-application stage.
- 5.224. **Designing out crime** and designing in **community safety** should be integral to development proposals and be considered at an early stage in the design process, with the overall aim being to reduce crime and fear of crime through good design.
- 5.225. The Government's 'Safer Places – The Planning System and Crime Prevention' guide outlines 7 attributes of sustainable communities that remain particularly relevant to crime prevention; these are set out below and should be considered for all major development proposals.
- **Access and movement:** places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
 - **Structure:** places that are structured so that different uses do not cause conflict.
 - **Surveillance:** places where all publicly accessible spaces are overlooked.
 - **Ownership:** places that promote a sense of ownership, respect, territorial responsibility and community.
 - **Physical protection:** places that include necessary, well-designed security features.
 - **Activity:** places where the level of human activity is appropriate to the location and creates a reduced risk of crime and sense of safety at all times.
 - **Management and maintenance:** places that are designed with management and maintenance in mind, to discourage crime in the present and the future.
- 5.226. The Council considers these attributes to be key to creating safe and secure places. Planning for safer places should be considered from the earliest stages of preparing development proposals, in order to avoid retrofitting costly, unsightly or poorly considered security features at a later stage. Designing out crime from inception should be prioritised over post-planning 'scheme compliance' accreditation.

Access and movement

- 5.227. Movement frameworks should have legible **direct routes** that lead to where people want to go. Routes should be **necessary**, linking uses or places of activity; unnecessary, under-used, or poorly thought out 'short-cut' connections can increase opportunities for crime. Pedestrian routes should be designed to ensure that people do

²² Further detailed information can be found at www.securedbydesign.com

not feel isolated from their surroundings with clear markers and **signage**; they should be **well-lit** and **overlooked** by surrounding buildings and activities.

Structure

5.228. A safe urban structure is central to creating a feeling of safety and discouraging criminal activity/anti-social behaviour. Layouts should be designed to maximise **active frontages**, minimise 'dead' spaces and blank facades, and provide **clearly defined** public and private spaces.

5.229. Perimeter blocks can provide a clear distinction between public 'fronts' and private 'backs' with **well-overlooked** entrances and **secure** amenity space. Cul-de-sacs can be highly secure but should be short in length and not linked by footpaths or back onto open land. Whilst cul-de-sacs benefit from **natural surveillance** and a greater **sense of ownership**, streets with higher levels of activity at different times of the day/evening can be equally as effective in reducing crime and fear of crime.

5.230. When planning mixed-use development, proposals should ensure that uses are **compatible** with the locality; careful consideration should be given to potential conflicts from a crime risk perspective. Remodelling or removing existing unused buildings and spaces which are vulnerable to crime will be encouraged, as part of new development proposals.

Surveillance

5.231. **Natural surveillance**, where people can 'see and be seen', is an important element of designing out crime; criminal activity is less likely to occur in areas which have a high degree of **visibility**, i.e. 'eyes on the street'. Buildings should provide active frontages with windows and doors facing onto the street, and at least one habitable room should be located to the front of residential properties. Larger flatted blocks and commercial buildings should provide active ground floor layouts. Open engaging public realm spaces which remove 'hiding places' and promote prolonged activity levels throughout the day/evening to deter criminal/anti-social behaviour will be supported.

Ownership

5.232. Undefined, unclaimed, or neglected 'left over' spaces can increase the risk of crime and anti-social behaviour. **Clearly defined** private, semi-private, and public space encourages residents and users to develop a **sense of ownership, responsibility** and **community** by removing ambiguity and uncertainty.

5.233. The boundaries of private spaces and communal areas should be clearly defined in a manner which is in keeping with the character of the surrounding area. Sensitive placement and appropriate selection of physical barriers such as gates, fences, walls and hedges is required, in order to create safe places which are also attractive. Higher more intensive boundary treatments should be visually permeable so as not to hinder surveillance or create an overbearing 'fortress' appearance which can inadvertently increase a perception/fear of crime.

5.234. Demarcation of space can also be achieved through the more subtle use of psychological barriers, such as the narrowing of entrances/thresholds to reduce a sense of public openness, changes to landscaping, surface levels and/or treatments to give a sense that one place is different from another and therefore different behavioural rules apply.

Physical protection

- 5.235. The use of physical security measures is an important aspect of crime prevention known as '**target hardening**'. Some measures are directly deliverable through the planning process; others complement what can be achieved through planning such as secure windows and doors set out by Secured by Design, which provides product quality/technical standards for building security. **Designing in** physical security measures is often more cost effective than adopting a post-planning retrofit approach.
- 5.236. Some security measures can adversely affect how a place looks and feels, such as security shutters, gates, and CCTV, which can appear overbearing or intimidating, increasing a perception/fear of crime. It is important to ensure that physical security measures do not negatively impact on the character and appearance of an area; particular care should be taken in more sensitive settings such as Conservation Areas. An appropriate balance is required between the benefits of 'target hardening' and the subsequent visual impacts.

Activity

- 5.237. **Active places** which encourage a **variety** of people to use the same space in different ways and at different times helps to create a feeling of safety and reduces the potential for crime by increasing levels of **natural surveillance**. Whilst natural surveillance increases the likelihood that crime will be seen and/or challenged, too much activity can risk anonymity which can help to facilitate other types of crime. Careful consideration should therefore be given to which levels and types of activity are appropriate in relation to the local context.
- 5.238. Mixed-use developments can be beneficial in reducing crime by increasing levels of activity throughout the day and evening. In residential developments it is important to encourage a **mixed community** by providing a variety of housing types and tenures accommodating people of different ages and lifestyles (i.e. working, retired people, and young families) to generate activity and natural surveillance at various times throughout the day, as well as fostering a shared sense of community.

Management and maintenance

- 5.239. In addition to design and layout, **management** and **maintenance** is paramount to how a place looks, feels, and functions over time. Good design helps to create a sense of place and environments that are valued by residents, encouraging a **sense of pride** and **ownership** which helps to discourage crime. However, perceptions of safety and place can be significantly compromised by poor management and maintenance. '
- 5.240. Consideration should be given to the **practical** management and maintenance of buildings and spaces from the outset, through good design and the use of **robust** materials that will endure over time. The Council will seek to secure the long term management of new development, including programmed cleaning and maintenance regimes through appropriate planning/legal mechanisms.

DG15: Designing Out Crime

Designing out crime and designing in community safety is key to creating safer places. All development proposals should seek to reduce crime and fear of crime by:

- a) Considering measures to design out crime early in the design process, reducing opportunities for crime and anti-social behaviour in the design and layout of new development.
- b) Providing safe and secure movement routes that are legible, direct, well-lit and overlooked ensuring that users feel connected to their surroundings.
- c) Maximising opportunities for natural surveillance in the design of buildings and spaces where people can 'see and be seen' providing active frontages and open public realm spaces.
- d) Creating clearly defined public and private spaces, avoiding ambiguity and encouraging a sense of ownership with appropriate boundary treatments marking public/private space thresholds.
- e) Encouraging a level of activity which is appropriate to the location; enabling a variety of uses for public realm spaces and housing types/tenures for residential developments to maximise activity throughout the day/evening.
- f) Incorporating physical security features where required without negatively impacting on the character and appearance of the area or increasing a perception/fear of crime.
- g) Considering the long term management and maintenance of buildings and spaces at an early stage; schemes should be designed to ensure design quality can be retained over a long period of time with minimal management and maintenance requirements/costs.

Relevant policy and guidance includes:

Local Plan – policies 4, 37, 92, 94 and 101

London Plan – objective GG1, and policies D3, D11 and HC6

NPPF – sections 8 and 12

Healthy

5.241. The places in which we live and work affect our physical and mental health and well-being. The health and well-being objectives set out in the Local Plan highlight the Council's aspiration to produce **healthier environments** and infrastructure to support people living longer, healthier, and more sustainable lives. Placing health at the heart of the design process is key to achieving this.

5.242. New development (including the redesign of existing buildings and spaces) offers many opportunities to enhance the health and well-being of occupants and users. The Council aims to ensure that the planning and design of new development makes best use of these opportunities by ensuring that the health and well-being benefits of schemes are delivered through the use of appropriate monitoring frameworks incorporated within S106 agreements or by planning condition.

5.243. Many of the key elements required for creating healthy places are interrelated and interdependent; for the purpose of clarity these have been split into the following four sections:

- Open Green Spaces (access, amenity, contact with nature)
- Community Amenity (social interaction, sense of belonging)
- Healthy Homes (comfortable, safe, sustainable environments)
- Healthy Streets (clean air, sustainable transport)

Open Green Spaces

5.244. Open green spaces refer to spaces across a variety of scales, which play a key role and provide significant benefits in terms of leisure, health and well-being, and quality of life. Bromley has a diverse network of strategic, neighbourhood and local open green spaces. These include 168 formal parks and countryside sites, 52 leisure gardens and allotments, 21 outdoor sports facilities, 68 playgrounds, 7 cemeteries, 10 closed churchyards, and large areas of woodland.



Figure 84 - High Elms Country Park, Farnborough: High Elms is a Site of Special Scientific Interest and a Local Nature Reserve offering 250 acres of woodland and meadow alongside a 150-acre golf course, which together form the High Elms Estate.

5.245. The Borough also contains areas where the provision of and access to open green space could be improved (identified as areas of Public Open Space Deficiency on the Local Plan Policies Map). Development at all scales should identify existing open green space conditions and local requirements, particularly the lack of open green spaces at a neighbourhood scale (2ha+).

5.246. The way in which open green spaces are designed in new developments should be carefully considered. The design of these spaces will vary in accordance with their function/type of space provided, i.e. a Local Area of Play (LAP) or formal park being very different to a large natural open space. However, consideration should be given to each of the following key elements of open space design:

1. Boundary: Consideration needs to be given to whether the space is fenced and gated without interrupting wildlife networks.

2. Entrances: Access points and paths need to be conveniently located on desire lines for walking and cycling.
3. Surveillance: Open spaces need to be overseen from surrounding buildings, streets and public spaces.
4. Activity: Sufficient space needs to be provided for sports pitches and play areas to avoid conflict with other uses.
5. Maintenance: The design of the space needs to take account of maintenance and adoption requirements.
6. Ecology: Open Green Spaces should include areas that are nature rich.
7. Access: Open Green Spaces should be accessible and welcoming to everyone.
8. Lighting: Needs to be considered for well-used footways and play areas but should avoid light spillage that causes nuisance or harms wildlife.

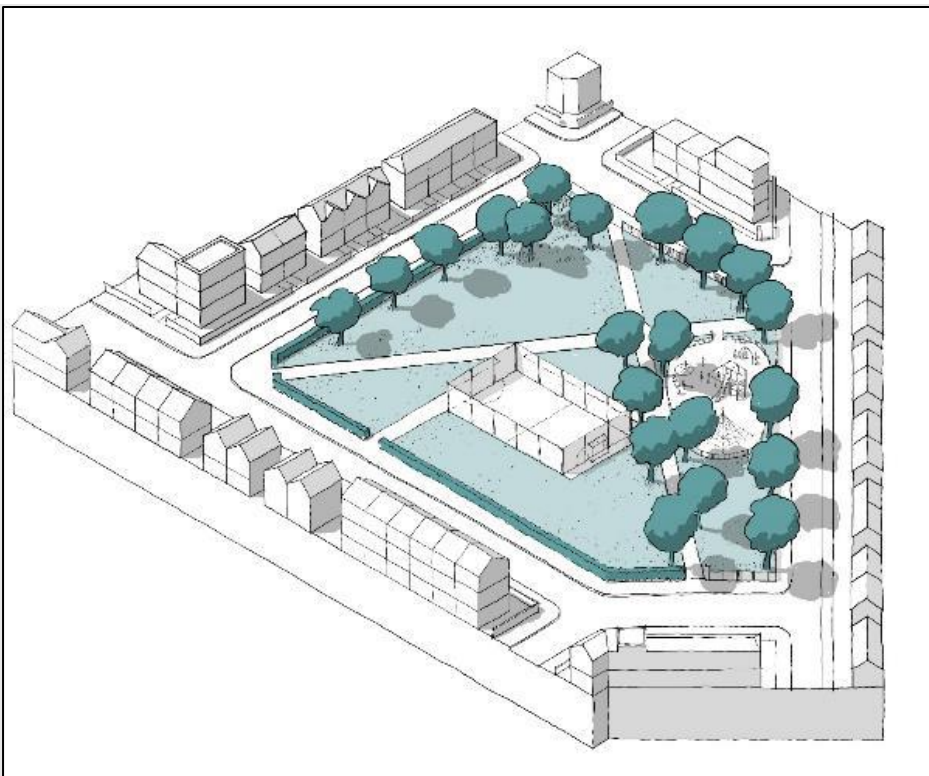


Figure 85 – key elements of open space design: Boundary treatment, entrances, desire lines, surveillance, activity, lighting, accessibility, ecology, maintenance and management

DG16: Open Green Space

All development proposals should contribute towards improving the access to, and the provision and quality of, local, neighbourhood and strategic open green spaces by:

- a) Undertaking an audit and appraisal to identify the function, benefits and accessibility of existing open green spaces. Where development is in an area already identified as having limited access to open green space, the provision for any new open green space should seek to exceed the minimum spatial and qualitative requirements.
- b) Ensuring new open green spaces are of an appropriate size and located so residents have easy and direct access to the space. For new neighbourhood scale open green space, the key elements of open space design will be important considerations.
- c) Ensuring new open green spaces are designed with an appropriate function to prevent them from being unused or neglected.
- d) Linking new open green spaces to Bromley's existing open green space network.
- e) Identifying existing natural features of the site to ensure they are retained to inform and enhance the design of new open green space.
- f) Using appropriate materials, planting, trees, and street furniture to reflect the local context.
- g) Establishing suitable management and maintenance plans to ensure that the quality of space/amenity will be retained over time.

Relevant policy and guidance includes:

Local Plan – policies 56, 57, 58 and 59

London Plan – objective GG3, and policies D8, G4 and G9

NPPF – sections 8 and 12

Community Amenity

5.247. Community amenity can be defined as the **shared** activities of the wider public or specific resident groups and their interactions within a common space or spaces. They are spaces that serve a communal function where a **sense of belonging** and ownership is generated as people interact, adopt, and adapt to their surroundings.

5.248. These spaces are used because they feel **safe, accessible** and **equitable**, have a clear function and are appealing places to be. The design of amenity spaces can make them more or less conducive to social interactions of all types, where a better physical framework is created outdoor activities tend to grow in number, duration and scope. Creating life between buildings is a self-reinforcing process (people attract people).

- 5.249. Creating the right environment for community amenity and a sense of belonging will instil a low incidence of people moving in and out of the area, helping to retain and develop strong and active communities that can support health and well-being. Development proposals can facilitate healthier behaviours and social cohesion by considering the activities that form part of regular commutes, leisure, and play, or where the participation in physical activity and other health-promoting activities are shared in a common space.
- 5.250. Development proposals should also consider the benefits of community events that promote health and well-being. Some events are particularly effective for reinforcing local identity and creating a sense of place. Public art can initiate local interest and distinctiveness, as well as helping people to find their way around the neighbourhood. Public events, such as community festivals and street parties can provide shared experiences which can foster a sense of belonging. Sharing information about the local environment and its history can create stronger links to the neighbourhood forging a stronger connection between people and place.



Figure 86 - Marmalade Lane, Cambridge: Shared spaces and communal facilities are designed to foster community spirit and sustainable living. These include extensive shared gardens as the focal space of the community, with areas for growing food, play, socialising and quiet contemplation.

- 5.251. Play forms a key part of community amenity and is an essential part of the social and physical development of children and young adults. Development proposals should seek to increase opportunities for play and informal recreation. Play provision should be well-designed, safe, accessible, inclusive and stimulating for all ages. Formal playspace should integrate into the wider network of public open spaces and not be severed from the rest of the neighbourhood by physical barriers. Appropriate

arrangements for management and maintenance of play and communal facilities should be provided.



Figure 87 - Cator Park, Kidbrooke Village, Greenwich: A landscape-led approach to estate regeneration introducing a range of amenity spaces including a destination playspace featuring play trails, sculptures, and structures. A multi-use games area is provided for older children.

DG17: Community Amenity

All development proposals should contribute towards improving community amenity by:

- a) Categorising the type of spaces created within the development to establish functions and benefits that serve community amenity.
- b) Supporting an appropriate balance of informal and formal social activities; creating meeting places, spaces which encourage people to stop and stay, and transient spaces which enable incidental interactions.
- c) Meeting the changing and diverse needs of a wide range of occupants of different ages, backgrounds, and interests for both new and existing communities.
- d) Providing activities and events that promote health and well-being by encouraging participation and social interaction.
- e) Providing appropriate play opportunities for at least three stages of childhood, including older children and teenagers.

Relevant policy and guidance includes:

Local Plan – policies 20, 21, and 22

London Plan – objective GG3, and policies D4, D5, G4, G7, S4 and S5

NPPF – sections 8 and 12

Healthy homes

- 5.252. Healthy homes refer to homes that provide internal environments and associated external spaces that support and improve the health and well-being of their occupants. They provide **comfortable, safe, accessible** and **sustainable** living environments to accommodate the changing needs of residents throughout their lifetimes enabling them to remain independent for longer.
- 5.253. **Adaptability** is key to long term health and well-being, development proposals should ensure that new homes are designed to provide flexible spaces which are able to respond to changing circumstances, lifestyles, work patterns, and new technologies. The design of buildings and ancillary spaces should **enable** rather than inhibit their users.
- 5.254. Development proposals can promote health and well-being by ensuring that buildings have good quality and quantity of daylight/sunlight and sufficient ventilation to provide fresh air, reduce the build-up of moisture and prevent overheating. It is important to avoid designed-in obsolescence and dependence on large amounts of energy/resources. Passive design measures should be adopted in both the design and layout of new buildings to harness the benefits of solar gain, natural light and ventilation, providing warm homes through the winter months and minimising overheating during the summer months.
- 5.255. Whilst the functional requirements of healthy homes are important considerations, it is also important to understand the relationship between 'quality of life' and 'place' – both in terms of the aesthetic qualities of good design (creating moments of joy and delight) and the value of creating sustainable social environments where people feel **connected** to their neighbours.
- 5.256. Other aspects of healthy homes include giving people greater **control** over buildings and how they use them with the use of emerging technologies to improve the functionality and comfort of internal spaces, including the use of sensors to control comfort levels and predict maintenance and repairs and the provision of good digital connectivity to reduce health inequalities.
- 5.257. To improve the standards of living and health outcomes in Bromley, development proposals should consider the objectives for healthy homes (highlighted above) alongside the relevant technical requirements (regulations and standards) and the key principles for good quality design outlined in the Housing Design section of the SPD guidance.



Figure 88 - Officers Field, Weymouth: *Prioritising sustainable living through a fabric-first approach and a mix of home sizes and tenures each with access to private and shared open space. Benefiting from light and space the homes feature a highly insulated fabric with energy generated by an on-site biomass CHP system and PV panels.*

DG18: Healthy Homes

All development proposals should seek to create healthy internal environments and associated external spaces by:

- a) Ensuring the functional needs of the home and its occupants are optimised for a range of social and quiet activities. Floor plans should be organised with generous and adaptable internal and external spaces, together with sufficient storage space.
- b) Connecting residents with the local community, green spaces and nature by creating visual links from habitable rooms to the street, a private amenity space or communal outdoor spaces.
- c) Utilising solar gain, natural ventilation and dynamic shading as natural sources for heating and cooling to maintain pleasant temperatures throughout the day, making health and comfort more affordable for its occupants.
- d) Optimising the provision of daylight within internal spaces to maintain pleasant lighting conditions throughout the day (the internal environment should be in direct contact with the circadian rhythm of day and night).
- e) Using natural ventilation to control air humidity and reduce the amount of CO₂, micro dust particles and allergens within internal spaces.
- f) Specifying low-toxic building processes and materials in the construction process.
- g) Providing good digital connections that allow occupants to access health care and online information about local health services, community events and activities.
- h) Providing information about the home and using smart devices, including monitors or meters and intuitive controls based on changes in the home such as motion, temperature and light.

Relevant policy and guidance includes:

Local Plan – policies 4, 37 and 47

London Plan – objectives GG1, GG2 and GG3, and policies D3, D4, SI 1, SI 2, SI 4, and SI 6

NPPF – section 12

Healthy streets

5.258. Healthy Streets refer to routes and spaces that play an important role in enabling people to walk and cycle around their neighbourhood. Encouraging people to walk and cycle increases regular physical activity and social interaction, whilst reducing congestion and carbon emissions improves air quality.

5.259. The **Healthy Streets Approach**, set out in policy T2 of the London Plan, uses a system of policies and strategies to deliver a healthier, more inclusive environment

where people choose to walk, cycle and use public transport. The approach is based on 10 evidence-based **Healthy Streets Indicators**, each identifying an aspect of human experience which should be considered in order to provide a healthy street environment.



Figure 89 - Healthy Streets Indicators: The 10 essential indicators for making streets work well for people.

5.260. It is important to note that the Healthy Streets Approach is not an idealised vision for a model street; it is a long-term plan for improving London’s streets, helping everyone to be more active and enjoy the health benefits of **social interaction** and **sustainable travel**.

5.261. Almost all streets can be improved against the 10 Healthy Street Indicators but how this is achieved will depend upon the type of street and its uses. The ‘place’ function of streets is typically defined by a street’s character and catchment area, the ‘movement’ function is defined by the importance of the street to the wider transport network. Different streets require different solutions; new proposals/interventions should be tailored to the street and its functions (there is no ‘one size fits all’ solution).

5.262. The design of healthy streets should be considered and prioritised during the early stages of the design process using **health**, **inclusion**, and **active travel** as key performance indicators on which to assess development proposals.

5.263. It is important that people are walking and cycling out of choice and that active travel is the most attractive option. Movement routes and spaces should connect the site to local facilities and public transport to encourage/enable a wide range of people to use them. Access to infrastructure is directly linked to behaviour change. By facilitating shorter journeys and ensuring that they are the most accessible and convenient option for everyone will reduce the likelihood of people choosing to travel by car.

DG19: Healthy Streets

All development proposals should seek to create healthy streets and spaces by:

- a) Adopting the Healthy Streets Approach outlined in the London Plan using health, inclusion, and active travel as key performance indicators for assessing design quality.
- b) Adopting an inclusive holistic approach to the design of streets considering their 'place' and 'movement' functions whilst prioritising the quality of the street level environment for pedestrians and cyclists (access and appeal) and reducing traffic congestion, noise and pollution.
- c) Identifying existing links and movement patterns including pedestrian/cycle paths to inform the location of new routes which should stitch into the wider street network and community/social infrastructure (public transport hubs, facilities and amenities).
- d) Creating streets which accommodate the 3 types of pedestrian activity: necessary and functional, optional recreational, and social activities (street life).
- e) Implementing measures to make streets healthier while preserving their 'movement' function including urban greening, safe crossing points, accessible footpaths, cycle parking and electric vehicle charging points.

Relevant policy and guidance includes:

Local Plan – policies 33 and 34

London Plan – objective GG3, and policies D5, T1, T2, T5 and T6

NPPF – sections 8 and 12

Sustainable

5.264. **Sustainable development** (economic, social, and environmental) can be defined as meeting the needs of the present without compromising the needs of future generations. **Sustainable design** ensures that new development contributes to economic vitality (by stimulating investment and growth), while supporting a mix of compatible uses and tenures (to create healthy communities) and considering the future impacts of climate change (by managing resources responsibly and effectively).

Resources and Efficiency

5.265. As set out in the NDG, well-designed places have a layout, form and mix of uses that reduces their resource requirements (land, energy and water), are fit for purpose and adaptable over time (reducing demolition and waste), and use materials and technologies (manufacturing and construction) to minimise their environmental impact.

5.266. Development proposals should ensure the efficient use of land by creating compact, walkable neighbourhoods with a mix of uses and facilities to reduce demand for energy (transport use) and support health and well-being (active lifestyles and community resilience). The retention and retrofitting of existing buildings, where appropriate, will be supported to reduce the environmental impact of demolition and new development.

5.267. Development proposals should reduce the need for energy through **passive design measures** by adopting a fabric first approach in relation to building layout and orientation to maximise beneficial solar gain, natural daylight, and ventilation. Glazing should be energy efficient and sized appropriately for context with consideration given to passive measures such as external shading devices to reduce reliance on mechanical ventilation. South facing single aspect homes that lead to overheating and north facing single aspect flats should be avoided.

5.268. Development proposals should seek to maximise the use of **renewable energy sources** and existing/planned infrastructures including PV arrays, heat pumps and district heating systems to reduce demand on non-sustainable energy sources.

5.269. Development proposals should also be designed to reduce water consumption and where relevant, prevent flooding by incorporating Sustainable Urban Drainage Systems (SUDs) to manage surface water and flood risk. New homes and buildings should contribute to the efficient use of water by incorporating internal **water saving measures** and external rainwater harvesting.

5.270. Appropriate provision should be made for the sustainable management and discharge of **waste**. Development proposals should incorporate facilities for the segregation, storage, and collection of recyclable and non-recyclable waste. Refuse storage and collection areas should be integrated into the design of buildings and spaces in a functional, efficient, and non-intrusive way.

5.271. The **selection of materials** and the type of **construction process** influences how energy efficient a building or place can be and how much embodied carbon it contains. Materials that are locally sourced with high thermal or solar performance properties and a long lifespan can reduce the environmental impact of new development. All

development proposals should demonstrate a responsible approach to the procurement and use/re-use of materials.

5.272. Materials should be manufactured from recycled or renewable resources wherever possible (recycled aggregates, steel, aluminum); timber should be procured from certified sustainable sources, the overuse of synthetic materials should be avoided.



Figure 90 - Derwenthorpe Phase 1, Osbaldwick, York: An exemplar low-carbon community of energy efficient homes. A community heating system supplied by biomass boilers was chosen as the most cost effective and future-proof means of achieving low carbon emissions. Green infrastructure lies at the heart of the masterplan, with the open space shaped by flood prevention and landscaping for biodiversity.



Figure 91 - Hanham Hall, South Gloucestershire: 187 homes built from factory made elements which minimise waste and are energy efficient to produce and build, the zero-carbon standard is achieved by using an efficient building envelope constructed using Structural Insulated Panels (SIPs) and roof-mounted PVs. The homes combine stack and cross ventilation, large openings, deep roof overhangs, balconies and shutters to avoid overheating.

Sustainable Construction

5.273. The aim of **sustainable construction** is to create buildings using processes which are environmentally responsible and resource efficient to reduce the impact on the environment. Sustainable construction doesn't end when the construction process is complete, the design of the buildings themselves should seek to minimise the environmental impact over their lifespan.

5.274. As set out in the NDG, reducing **embodied energy** (the energy consumed by all the processes associated with building construction) can be achieved by:

- Re-using and refurbishing existing buildings where possible in preference to new construction.
- Embedding circular economy principles to reduce embodied carbon/energy/ and reduce waste.
- Re-use of materials and design for disassembly.

5.275. All development should seek to reduce waste and support the circular economy by re-using buildings/components/materials, recycling materials back into the manufacturing process, and retaining 'value' in buildings and their components. Energy saving measures should be considered from the outset and integrated into the design rather than being seen as an optional 'add on'.

5.276. Modern methods of construction which include off-site manufacturing (modular housing) and on-site techniques which provide an alternative to traditional building methods can also contribute to the efficient use of resources. Development proposals for modular production will be subject to the same level of design scrutiny and quality benchmarks as conventional builds.



Figure 92 - Beechwood West, Basildon: A new neighbourhood of over 250 volumetric family houses utilising factory-built modular technology offering a choice of housing typologies, layouts and external finishes, precision engineered in an efficient and sustainable way with a significant reduction in construction waste compared with traditional build methods.



Figure 93 - Union Wharf, Greenwich: One of the first high-rise residential projects in the UK to use volumetric off-site construction; although initially designed to be delivered traditionally, the rationalisation of design elements and a repeated floorplate enabled its conversion to modular build construction, retaining design quality while maximising the benefits of off-site design and delivery.

Green Infrastructure

- 5.277. Green infrastructure (GI) refers to a **network** of urban and rural green and blue spaces and features, which can deliver a wide range of environmental and quality of life benefits for local communities. It includes parks, open spaces, woodlands, allotments, private gardens, street trees, and green roofs.
- 5.278. As set out in the London Plan, green infrastructure should be **planned, designed, and managed** in an **integrated** way to achieve multiple benefits which include promoting mental and physical health and well-being; adapting to the impacts of climate change and the urban heat island effect; improving air and water quality; encouraging walking, cycling, recreation and play; supporting landscape and heritage conservation; supporting food growing, and ensuring biodiversity net gain.
- 5.279. Bromley benefits from large swathes of designated Green Belt, MOL, and Urban Open Space, parts of which form part of the South-East London Green Chain. All development proposals should seek to preserve and enhance the borough's existing green infrastructure network.
- 5.280. Key objectives of green infrastructure planning/delivery should include utilising opportunities to create **multi-functional spaces/benefits** to make the most efficient use of land, identifying and enhancing existing GI assets, providing new green infrastructure and creating new links where there is scope to do so, including opportunities beyond the borough boundary.
- 5.281. The nature of development should determine the **priorities and opportunities** for green infrastructure on a particular site, i.e. the creation of open space with footpaths/cycle paths (encouraging active lifestyles/sustainable travel), incorporation of SUDs (to reduce flooding and deliver biodiversity net gain), tree planting (amenity, shade and climate benefits), community gardens (local food growing), and/or recreational space (health and well-being).
- 5.282. Applicants will be expected to acknowledge the **function, characteristics, and benefits** of existing GI (i.e. nature, water, amenity, relevance within a wider context) with the aim of **protecting** GI assets that function well, **enhancing** those that do not, and **integrating** new GI assets where appropriate.
- 5.283. The success of new landscape/green infrastructure interventions is not only dependent upon high quality well-considered design, but also appropriate **management and maintenance**. Inadequate provision and/or poor planning will result in unattractive/unusable elements which function poorly. All applicants will be required to provide a Management and Maintenance Plan.



Figure 94 - Barking Riverside, East London: A 179 hectare brownfield site situated on the north bank of the River Thames with planning permission granted for over 10,000 homes. Over 40% of land is dedicated to open space including parkland linked by cycle routes and footpaths. A range of environmental measures include energy saving homes, rainwater harvesting, SUDs, green roofs, and conservation of local biodiversity.



Figure 95 - Upton, Northampton: Sustainable Urban Drainage Systems are incorporated throughout the masterplan (an urban extension of approximately 1350 homes) with generously sized swales contributing to the character, identity and biodiversity of the neighbourhood. The swales have both functional and aesthetic benefits; reducing flood risk by storing and infiltrating water runoff, whilst also creating attractive green corridors which soften the streets.

Urban Greening

- 5.284. Urban greening covers a wide range of elements/options including, but not limited to, street trees, green roofs, green walls, and rain gardens. These can provide a range of benefits including amenity, enhanced biodiversity, mitigating the urban heat island effect, and nature-based sustainable drainage.
- 5.285. Green infrastructure and urban greening should be **integral** to the layout and design of new buildings and large-scale developments, it should be considered from the beginning of the design process and not seen as an optional 'add-on' towards the end.
- 5.286. The London Plan requires boroughs to develop an **Urban Greening Factor (UGF)** to identify the appropriate amount of urban greening required in new developments. The Urban Greening Factor is a tool that evaluates and quantifies the **amount** and **quality** of urban greening that a scheme provides.
- 5.287. As the Local Plan has not yet adopted an Urban Greening Factor for new developments, developments that are predominantly residential should seek to achieve a target score of 0.4, and developments that are predominantly commercial should seek to achieve a target score of 0.3 in accordance with Policy G5 of the London Plan.
- 5.288. In accordance with London Plan and Local Plan policies, all development should seek to incorporate **Sustainable Urban Drainage Systems (SUDs)** or demonstrate alternative approaches to the management of surface water.
- 5.289. Incorporating green roofs and green walls which contribute towards drainage, cooling and biodiversity will be encouraged. Green roofs/walls have several benefits but require careful planning and design; key aspects that need to be considered include orientation, light levels, irrigation, amenity, and shade.



Figure 96 - Fenchurch Street, London: At over 700sqm this living wall contains around 52,000 plants. The wall was installed on an annex service building opposite the southern entrance providing visual amenity with urban climate mitigation and biodiversity benefits.

Biodiversity

5.290. Biodiversity describes the variety of life on earth in all its forms, it incorporates all species and habitats, both rare and common, and includes genetic diversity. Biodiversity provides us with a wide range of vital ecosystem services, including healthy soil, pollinators, food, purification of water, clean air, climate regulation, flood management and carbon storage. Supporting biodiversity is essential for sustainable development and human health and wellbeing.

Biodiversity in Bromley

5.291. The London Borough of Bromley is important for a wide range of wildlife, having species and habitats in common with both Kent and London. It contains London's largest area of countryside, stretching south to the crest of the North Downs, and includes a good proportion of London's semi-natural habitats. In order to protect these habitats, many areas of the borough are designated in the Bromley Local Plan as **Sites of Importance for Nature Conservation (SINCs)**.

5.292. These include sites important within London (Sites of Metropolitan Importance) as well as those of Borough and Local importance. In addition, Bromley's designated **Local Green Spaces**, (green and/or open spaces of particular value and significance to the local community) are also of biodiversity value. Some sites hold other designations at the local level: **Local Nature Reserves (LNRs)** or are of national importance: **Sites of Special Scientific Interest (SSSIs)**. Wildlife is not confined to open countryside; urban habitats make a significant contribution to the biodiversity of Bromley and are residents' first and most frequent points of contact with the natural world. Further detailed information and guidance in relation to local habitats and species can be found in the Bromley Biodiversity Plan²³.

Biodiversity and development

5.293. All development has the potential to impact both positively and negatively on local biodiversity and the natural environment. Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a measurably better state than it was beforehand. This includes **avoiding** any on-site loss, **mitigating** any loss if it cannot be avoided, and as a last resort, **compensating** for any loss off-site (offsetting). Development should not lead to a loss of biodiversity and should achieve a minimum Biodiversity Net Gain (BNG) of 10% in accordance with the Environment Act 2021, unless the development is exempted by this legislation.



Figure 97 – Biodiversity Mitigation Hierarchy

5.294. The **mitigation hierarchy** aims to prevent net biodiversity loss by adhering to the following principles:

²³ <https://www.bromley.gov.uk/downloads/download/167/bromley-biodiversity-plan>

- **Avoidance** – Significant harm should be avoided and reduced by using alternative sites and designs, retaining habitats of value for enhancement and management, and retaining species in situ
- **Mitigation** – Impacts considered unavoidable should be mitigated where the impact occurs, by replacing lost protected and priority habitats, and accommodating displaced species within the site boundary
- **Compensation** – Where on-site measures are insufficient, as a last resort, off-site measures should be implemented in proportion to the impact, by creating suitable habitat off-site and relocating species

5.295. In accordance with national, London and local policy requirements, applicants must demonstrate that development proposals follow the mitigation hierarchy; where there are no anticipated impacts, development should still secure BNG.

Planning process requirements

5.296. All development proposals should follow the key stages set out below. It is the responsibility of the applicant to ensure that each stage is appropriately addressed.

Stage 1 – Assessment of Ecological Impact

5.297. Development proposals should be informed by the best available ecological information from the start of the development process. Ecological surveys should assess habitats and species within the development site or where they are otherwise affected by the proposals, and any impacts on designated sites within or in close proximity to the development site. Surveys should assess the site's existing ecology and whether there are likely to be impacts from the proposals on-site or within a wider zone of influence of the development.

5.298. Applicants are expected to provide accurate information on the existence of habitats or biodiversity features and species present on the proposed development site. It is important to note that some sites may not have been subject to ecological surveys before, and an absence of records does not equate to an absence of species.

5.299. The baseline assessment of the site should also identify what opportunities there are for ecological enhancement and how to achieve BNG. In addition to a Phase 1 Preliminary Ecological Appraisal, a more detailed Phase 2 Ecological Impact Assessment and/or further detailed species-specific surveys may also be required to accompany a formal planning application.

Stage 2 – Design

5.300. The ecological survey information should be used to inform the design and layout of development which should seek to retain and incorporate existing key habitats and features giving priority to protected species and habitats included in the Bromley Biodiversity Plan. Development proposals should follow the mitigation hierarchy by avoiding harm to habitats and species through careful consideration of siting, scale and design, avoiding areas of biodiversity value and maintaining existing on-site/off-site ecological connectivity/wildlife corridors.

5.301. Where the retention of existing habitats or avoidance of adverse impacts is not possible, mitigation measures may include timing the development of sites to avoid breeding seasons, i.e. tree work and hedgerow removal carried out during the winter months and/or creating buffer zones between sensitive areas and development areas to reduce disturbance to habitats.

5.302. In cases where damage is unavoidable, applicants should propose steps for compensating for any loss to biodiversity by creating new replacement habitat either on-site or off-site. However, there are only limited circumstances where 'biodiversity offsetting' will be justified. As outlined in the mitigation hierarchy within the London Plan, compensation should be of an overall greater biodiversity value than that which is lost.

Stage 3 – Monitoring and Management

5.303. In order to ensure the success of biodiversity protection and enhancement measures, monitoring and management will be required. This may include the monitoring of a site during, and post construction phase to measure the impacts on notable or protected species, the appropriate management of retained and/or created habitats and features to ensure that the enhancement, mitigation and/or compensation devised in stages 1 and 2 remain appropriate and effective, and to ensure compliance with relevant legal requirements.

5.304. Planning applications should include costed maintenance specifications and monitoring proposals for habitats/ecological features and describe how these aspects would be implemented. This should include a description of the resources required, the personnel involved and a procedure for ensuring that any new owners/occupiers are aware of their responsibilities.

Adaptability and Resilience

5.305. Successful places can adapt to change (social, economic, and environmental) with the ability to accommodate new uses, changing needs and circumstances. Places need to be **adaptable** at every scale, from the layout, structure, and infrastructure of the site/wider area to the flexibility and adaptability of individual buildings and spaces.

5.306. **Resilience** refers to the ability to respond to and recover from, adverse situations, i.e., health, economic, and/or climate change challenges. All development should have a capacity to mitigate potential impacts and adapt to change (by necessity or choice).

5.307. As set out in the NDG, well designed places are designed for long-term stewardship, are robust and made to last, and are adaptable to changing needs. They have an emphasis on quality and simplicity. Design can address several factors that influence the lifespan of places.

5.308. The **layout** of streets, spaces, and block sizes play a major role in determining how adaptable a place is; connected streets, 'public' realm, and fine grain development is easier to adapt than large scale structures and privately owned streets/spaces which inhibit change. Development proposals should seek to provide a flexible layout of streets and blocks that can accommodate a range of different uses and densities over time – embedding adaptability and resilience into new communities to ensure their long-term sustainability.

5.309. Scenario planning should form a key part of the design process, i.e., considering how buildings/spaces could be used if circumstances changed – from the outset, rather than rigidly tailoring a building/space to one particular use. Designing-in some degree of **flexibility** within the form and structure of the building itself and/or the configuration of internal spaces/services will prolong the **lifespan** of a building and its components enabling rather than preventing, future conversion and re-use.

- 5.310. Simple, robust **building forms** allow for a greater variety of potential future uses to be accommodated – complex forms are more difficult to change, extend and adapt. Loose fit structures and simple plan forms allow for adjustment, subdivision, and reconfiguration of internal spaces. Access, floor-to-ceiling heights and building depths should also be considered.
- 5.311. The retention, conversion, and re-use of buildings and **heritage assets** where appropriate will be encouraged to prevent risk of dereliction and/or demolition. Historic and older buildings have an intrinsic tangible and intangible value to local communities, safeguarding the future of designated and non-designated heritage assets for current and future generations is key to local identity and good placemaking.
- 5.312. Adaptation to new uses can bring old buildings back to life, however, new uses should be compatible with the character, appearance, and fabric of the building and its setting. Any change of use should ideally involve as little change as possible to valued elements (external and internal). Where external alterations are required the architectural integrity of the building should not be lost, consideration should be given to scale and proportion, junctions and transitions, materiality and detailing – as referenced in the Architectural Design section of this SPD guidance.
- 5.313. In accordance with London Plan and Local Plan policy requirements development proposals are required to integrate circular economy principles as part of the design process. A **circular economy** is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste.
- 5.314. The adoption of circular economy principles means creating a built environment where buildings are designed for **adaptation, reconstruction and deconstruction** to extend the useful life of buildings and allow for components and materials to be reused or recycled. Applications for major development proposals are required to submit a **Circular Economy Statement** to cover the whole life cycle of development demonstrating the measures being taken to save resources, minimise waste, and reduce carbon emissions.
- 5.315. At the planning application stage major development proposals must produce a clear strategy detailing how the development will minimise carbon emissions in line with the London Plan energy hierarchy, to align with the Government’s legal commitment to **Net Zero Carbon** by 2050. Applications referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.



Figure 98 - Wren House, Hatton Garden: Originally built as a church in c.1670, it was then adapted for use as a charity school in 1696, before being reconstructed internally to provide contemporary office space. The original Grade II listed facade has been restored and retained.

DG20: Sustainable Design

All development should seek to achieve the highest standards of sustainable design and construction in accordance with London Plan and Local Plan policies, to ensure the efficient use of resources and to mitigate the impacts of climate change by:

- a) Making efficient use of land and adopting a fabric first approach to the design and layout of buildings with passive design measures to harness solar gain, natural light and ventilation reducing the need for mechanical ventilation.
- b) Using energy efficient glazing and enhanced insulation to reduce heat loss and energy demand. Use of renewable energy sources including PV panels to reduce demand on non-sustainable energy sources.
- c) Incorporating internal water saving measures to minimise consumption, and external Sustainable Urban Drainage Systems (SUDs) to manage surface water and flood risk.
- d) Making appropriate provision for the sustainable management and discharge of waste, incorporating facilities for the segregation, storage and collection of recyclable and non-recyclable waste.
- e) Selecting materials and construction methods to reduce the carbon footprint. Materials should be manufactured from recycled or renewable resources where possible, and construction waste reduced in accordance with circular economy principles.

- f) Maximising opportunities to enhance existing and/or introduce new Green Infrastructure (GI) and urban greening including street trees, green roofs/walls, rain gardens and nature-based sustainable drainage measures.
- g) Ensuring biodiversity net gain, following the principles of the mitigation hierarchy and planning stage requirements including the assessment of ecological impact, adoption of appropriate design strategies, and the monitoring and management of environmental impacts.
- h) Creating adaptable layouts and building forms to provide greater flexibility for alternative future uses to increase the lifespan/resilience of buildings and places against social, technological and environmental change.

Relevant policy and guidance includes:

Local Plan – policies 4, 37, 68, 69, 70, 71, 72, 73, 74, 75, 77, 78, 79, 115, 116, 118 and 123

London Plan – objectives GG3 and GG6, and policies D4, D11, G1, G5, G6, S1, SI1, SI2, SI3 and SI4

NPPF – sections 12, 14 and 15

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THE LONDON BOROUGH
www.bromley.gov.uk

Urban Design Guide Supplementary Planning Document

Regulation 12(a) Consultation Statement

June 2023

1	Introduction	1
2	Draft SPD consultation information	1
3	Draft SPD consultation responses	2

1 Introduction

- 1.1 This Consultation Statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement accompanies the Urban Design Guide Supplementary Planning Document (SPD). The statement sets out details of the consultation which has informed the SPD, detailing who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.

2 Draft SPD consultation information

- 2.1 From 28 October 2022 to 9 December 2022, the Council consulted on the draft Urban Design Guide SPD.
- 2.2 The consultation was publicised extensively, as follows:
- The draft SPD and a Strategic Environmental Assessment screening statement were hosted on the Council SPD webpage¹, with a link from the main consultation webpage². Comments were invited by email, in writing or via a questionnaire hosted on Survey Monkey.
 - The consultation was promoted in Council's digital newsletter (to 70,000 residents).
 - Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
 - A Council news releases at launch, with a further release as a final reminder ahead of the consultation deadline. These news releases were also shared with the Council's business contacts, community groups and residents associations, who were encouraged to circulate to their members.
 - Social media posts from the Council's accounts.
- 2.3 34 representations were received in total, as follows:
- 28 via email.
 - 6 responses submitted via the Survey Monkey questionnaire on the Council's website
- 2.4 The Council wishes to thank all respondents for taking the time to respond to the draft SPD. All comments have been considered and have helped to inform the final SPD. Section 3 of this document summarises the comments received and provides the Council's response to the comments.

¹ <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

² <https://www.bromley.gov.uk/consultations>

3 Draft SPD consultation responses

- 3.1 Table 1 summarises the responses received as part of the draft SPD consultation between October and December 2022; and how these responses have been addressed in the final SPD.

Table 1:

Respondent	Consultation response	How has response been addressed?
Individual	Please note in your document the misspelling of Biggin ("Bigging") at point 3.18.	Change - error will be amended
Individual	Document lacks vision and should do more to promote active travel set out how new development should address the modal shift to movement and activity patterns through the design of streets and spaces.	No change – the Council recognises the importance of promoting active travel, and the SPD already includes guidance relating to this (particularly at DG16). The Vision reflects the vision in the adopted Local Plan.
Natural England	The SPD could consider making provision for Green Infrastructure within development. There may be significant opportunities to retrofit GI in urban environments through green roof systems, roof gardens, green walls, new tree planting or altering the management of land. You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. This SPD could consider biodiversity enhancement and landscape enhancement.	Change – the Council acknowledges the importance of green infrastructure. The SPD contains dedicated sections on Landscape, Open Green Spaces, Green Infrastructure, Urban Greening, and Resources and Efficiency which provide detailed guidance on the considerations that have been suggested. Some additional/expanded guidance has been provided relating to biodiversity and landscape design.
Individual	The draft urban design guide on your website lacks a vision for more social housing, which will need to be designed to increase density throughout the borough, including in leafy streets. Without that vision the guide is a document that changes nothing and achieves less.	No change – the Council agrees that provision of new affordable housing is important. The SPD provides guidance that would apply to new housing development but a vision for more social housing is outside the scope of the SPD. Policy relating to affordable housing applies to all relevant developments, as set out in Local Plan and London Plan. There is no need to repeat this in the SPD.
Historic England	Chapter 2: Including a reference to Neighbourhood Plans and Town Centre SPDs is recommended. Figure 1 could be improved.	Change – references to the Orpington and Bromley Town Centre SPDs have been included, and a new Figure 1 diagram has been included. Bromley has no neighbourhood plans hence it is not considered necessary to add reference at this time.
	Chapter 3: Para 3.26 should be accompanied by a list or map of Bromley's conservation areas. A paragraph summarising the archaeological resource/implications is recommended. Recommended that para 3.34 includes a reference to Biggin Hill RAF Conservation Area.	Change – the Council recognises the importance of protecting heritage assets and includes guidance relating to this. A list of conservation areas and archaeological resources is not considered necessary for this SPD; the areas are clearly mapped in the Local Plan and on the Council's website. A reference to Biggin Hill RAF CA will be included as it is relevant to the area's character.
	Chapter 5: The wording of para 5.10 should be revised to reference Bromley's numerous designated heritage assets. The SPD could also include a map illustrating conservation areas and archaeological priority areas. Consider producing a specific Tall Buildings SPD.	Change - Paragraph 5.10 has been amended to reference the numerous heritage assets and CAs within the borough. The suggestion of a Tall Building SPD is noted but is not considered necessary at this stage.
	DG1: Should reference Local Plan policies 38 to 43, London Plan HC1 and NPPF Section 16 and include a reference to archaeology.	Change - Additional policy reference numbers have been added, with additional references to archaeology added in sections 2 and 3.
	DG2: Introductory paragraph should be strengthened with regard to harm and public benefits (suggested text). DG2 should also include the requirement to consider the potential for archaeological impacts of proposals.	Change - Reference to archaeological impacts have been added. DG2 introductory paragraph has also been amended in response to comments.
	DG3: Consider including guidance on the provision of public realm to enhance local character through sympathetic materials, accessibility, and opportunities to reconnect historic routes.	Change – the Council agrees that provision of public realm provides an important opportunity to enhance local character but considers that existing references to public realm improvement and movement route opportunities included in the Layout, Public Realm and Movement sections are sufficient.
	DG4: Should include the need for tall buildings to be carefully designed through 360 degrees with particular care being given to street frontages and servicing. May wish to reference Historic England Advice Note 4 Tall Buildings.	Change – the Council agrees that these aspects of tall building design are important but considers that these points are already covered in DG4. General reference to Historic England advice and guidance notes has been added to section 2.

Respondent	Consultation response	How has response been addressed?
	<p>Shopfronts: should highlight that listed buildings will require LBC. Para 5.124 change Beaux-Arts to Arts and Crafts. Para 5.137 could include tile and terracotta.</p>	<p>Change – reference to the requirement for Listed Building Consent has been included in Section 2 (Planning application process). Suggested amendments to the shopfronts section have been made as suggested.</p>
	<p>Public Realm: Could expand this area of advice to encompass sustainable transport infrastructure, signage, access etc. Could reference Mayors public realm guidance (8 principles) and/or consider providing a separate detailed advice document.</p>	<p>No change – the Council agrees that these issues are important for public realm design but considers that the guidance in the Public Realm section already addresses these issues.</p>
Metropolitan Police Service	<p>I would strongly recommend the inclusion of Secured by Design. I note the mention of security rated shutters and toughened glass, tested and accredited products are required.</p>	<p>Change – the Council agrees that designing out crime should be an important consideration. A Designing Out Crime section has been added to the SPD, including a reference to Secured by Design. However, requiring specific tested and accredited products is beyond the remit of the SPD.</p>
Transport for London	<p><u>General</u></p> <p>The content is comprehensive and ambitious. To ensure that it has a positive influence on those proposing and designing new development, it would help if the document could be more visually engaging. The use of precedent photographs is very good, but there could also be diagrammatic drawings to help to make the points described in the text. Similarly, the graphic design could do more to help differentiate between sections, help users navigate the document and find the content they need.</p> <p>Much of the early part of the document reiterates national and London-wide guidance, which shows that this fits into a robust, logical hierarchy. However, some of this context runs the risk of losing the reader in a mass of information and lists of principles from other sources. It would be helpful if the document could do more to translate that guidance into locally specific requirements and more could be done to signpost other guidance rather than restating its contents.</p> <p>It would be constructive and helpful to emphasise even more strongly the role of the street in discussion of landscape, public space or the public realm, or of response to context. Promoting the design of streets as integrated, multi-functional public spaces, with a key role to play in areas such as use and activity, personal safety and response to climate change would be a strong message – related both to the internal streets of new developments and to the streets that form the edges of development sites, which often get overlooked. At present, streets are not mentioned in the Landscape section, paras 5.162 to 5.171. Separating ‘Landscape’ and ‘Public Realm’ may not be a helpful distinction when it comes to good placemaking.</p>	<p>No change – the Council agrees that there is a need to balance text and visuals, but consider that the document achieves the right balance between text, diagrams and precedent images.</p> <p>The supporting text for each urban design element follows a clear structure; beginning with an introduction to the topic, relevant policy context, key aspects, local context/approach, and specific requirements. Rooting the text within the wider NPPF/NDG/London Plan policy framework is considered key to making the document robust. Specific policies are signposted within the Design Guidance Notes.</p> <p>The importance of connected routes and spaces, and ease of movement is highlighted within the Public Realm section. The role of streets as multi-functional public spaces is highlighted within the ‘streets as places’ section of the document.</p>
	<p><u>Principles</u></p> <p>Pg. 28 (4.15) We support the adoption of a design-led approach that optimises the capacity of sites, including site allocations. This should include consideration of connectivity (active travel and public transport) so that the development potential of sites with good connectivity is optimised.</p> <p>Pg. 28 (4.17) Mention of connectivity and permeability could be elaborated in ways that draw on the importance of connecting to local services and promoting walking, cycling and access to public transport.</p> <p>The ‘Assessing good design’ section would benefit from mentioning any assessment tools that the council recommends for testing design quality, such as the Healthy Streets Check or Building for Healthy Life toolkit.</p> <p>Generally this section could be more forthcoming about expectations of prospective applicants for planning applications or pre-application discussions. This could include setting out how the six principles are addressed explicitly in how a Design and Access Statement is structured. There is also a potential role for TfL’s recommended Active Travel Zone assessments in demonstrating how ease of movement and access to services and social and economic opportunities should be demonstrated in a development proposal.</p>	<p>Change – the Council agrees that consideration of connectivity is vital. Connectivity forms part of the design-led approach; it forms one of the six overarching LBB Design Principles referenced in Chapter 4 and has a dedicated section in Chapter 5.</p> <p>The reference made to Connection in Paragraph 4.17 is used in the context of form and layout as one of 3 broad initial design considerations as opposed to specific connectivity requirements which are referenced in Section 5.</p> <p>The intention of the ‘Assessing good design’ section is to highlight the key broad considerations that architects and designers should consider as a starting point to inform thinking as opposed to recommending specific assessment tools.</p> <p>Expectations and requirements for applicants are set out in section 2; the suggestion for applicants to demonstrate how the Council’s six Design Principles will be addressed in the Design and Access Statement has been added.</p>
	<p><u>Movement and Access</u></p>	<p>No change – the Council recognises the importance of ensuring cyclist/pedestrian safety, but consider guidance in section 5 to be sufficient in</p>

Respondent	Consultation response	How has response been addressed?
	<p>Pg. 84 (5.106): The focus on cyclist/pedestrian safety in relation to vehicle accesses is welcomed. We would suggest further strengthening this text by noting that vehicular accesses should, wherever practicable, be located along frontages with the least pedestrian/cyclist traffic, and should also promote the incorporation of pedestrian priority measures such as raised crossings to lessen the impact on pedestrian movement.</p> <p>Para 5.106 and policy DG8: There could be more helpful content on how to design for cycle access in employment area, acknowledging both that employees can be encouraged to, or discouraged from, cycling by the facilities at their place of work, and that cycle freight can be important for the efficient distribution of goods locally. At present, the content reads as if pedestrians and cyclists are to be 'designed around' because of road safety issues. There is not enough here on positive encouragement of active travel.</p> <p>It may be desirable to break down the 'non-residential' category into more fine-grained distinctions. For example, the urban design advice that might be given for a 'traditional' industrial estate would be very different from a co-location project. It would be worth referring to GLA guidance on industrial intensification and co-location.</p>	<p>highlighting the key requirements for pedestrian and cyclist accessibility and safety for non-residential developments. Further benefits of active travel are referenced in other sections of the SPD.</p> <p>Officers consider one 'non-residential design' category to be sufficient.</p>
	<p><u>Parking and Servicing</u></p> <p>Pg. 84 (5.107): We welcome the reference to London Plan car parking standards and the statement that car-free development should be the starting point for all development.</p> <p>However some direction could be given on how space for essential parking including Blue Badge parking can best be accommodated in a street environment. More could be done to explore how essential parking can be sensitively integrated, along with elements such as tree planting and sustainable urban drainage.</p> <p>This section deals exclusively with car parking, but no mention is made of cycle parking. It would be helpful to highlight that the provision of high-quality and well-designed cycle parking in line with London Cycling Design Standards (LCDS) can serve as an effective alternative to car parking, particularly in town centres and may help to justify car-free development on sites with more limited public transport connections.</p>	<p>No change - Paragraph 5.107 refers to parking and servicing for non-residential developments. Reference is made in DG11 to street trees and green infrastructure to soften the impact of parking.</p> <p>Cycle parking is referenced in the Healthy Streets section (DG16)</p>
	<p><u>DG8 – Non-residential development</u></p> <p>Pg. 89 (DG8 b)): Again it would be helpful to refer to cycle parking as well as car parking. The list of relevant policy and guidance should also include London Plan transport policies, specifically T1, T5, T6, and T7</p>	<p>Change - The reference to car parking in DG8 relates to minimising the visual impact on the streetscene as opposed to car parking provision. References to additional London Plan transport policies have been added.</p>
	<p><u>Public Realm</u></p> <p>Pgs. 108-116: The Public Realm design principles could place more emphasis on the need to focus on connectivity and permeability in creating successful public places. As noted later in 5.189 connectivity directly influences how places function and feel. This principle could be woven into the Public Realm section more strongly, with a particular emphasis on promoting walkability, cycling, and connections between public transport connections/hubs and public spaces. Further, the approach should encourage the development of spaces that are car-free where appropriate and, where car access is required for whatever reason, to ensure that vehicle movement is subservient to that of pedestrians and cyclists, in line with Healthy Streets principles. LP policy T2 should be cited in the DG10 list of relevant policy and guidance as it is a key principle in people-friendly public realm.</p> <p>We would advise starting with London Plan policy D8 on public realm and demonstrating what is expected from a good local interpretation of the policy.</p> <p>It would be helpful to mention the potential for community engagement and co-design in street and public realm projects, and the possibility of meanwhile and experimental uses of public space, referring to the experience gained in the pandemic.</p>	<p>Change - The five public realm design principles are broad principles which cover the key attributes of successful public realm spaces. The importance of responding to existing routes, connections and ease of movement is referenced in DG10. The 'Connected' and 'Healthy' sections of the document promote walking, cycling and connectivity to transport hubs. Reference to London Plan policy T2 added to DG2.</p> <p>The intention of the document is not to replicate specific London Plan policies, but Policy D8 has been referenced as relevant policy within DG10, The Public Realm section of the document reflects many of the key objectives from policy D8 and sets out how they should be applied in Bromley.</p> <p>The potential and need for public engagement is referenced in the public art, inclusive, and meanwhile use sections of the document.</p>

Respondent	Consultation response	How has response been addressed?
	<p><u>Connected – Movement</u></p> <p>Pg. 121 (5.193): It should be made clear here that pedestrian and cyclist (as well as bus) movement takes priority over cars and new street networks should be designed with that hierarchy in mind. This may involve filtered permeability where direct vehicle access may be restricted. A simple way of expressing this would be that permeability should be maximised for pedestrians and cyclists but carefully managed for motor vehicles. Consideration may need to be given to differentiating between emergency vehicles and servicing vehicles and other motor traffic when it comes to access and permeability. It would be helpful to mention London’s experience of Low Traffic Neighbourhoods and whether the council would be open to neighbourhood-scale approaches such as this.</p> <p>Pg. 121 (5.195): Where cul-de-sacs and other non-permeable streets are approved, there should be a strong preference for still allowing pedestrian (and ideally cyclist) through-traffic, if feasible. Similarly, where opportunities to do so are identified, new pedestrian/cycling connections should be made through existing cul-de-sacs and dead ends.</p> <p>Pg. 123 (5.199): We welcome the requirement for development proposals to establish a clear user hierarchy putting pedestrians first, followed by cyclists, public transport use, and finally private motor vehicles. This statement is important and an example of content that should be made more prominent through the graphic design of the document.</p>	<p>No change - an amendment has been made to section on street networks to reflect priority for sustainable transport.</p> <p>The suggestion for paragraph 5.195 is not considered appropriate as it is likely to conflict with Designing Out Crime guidance in relation to cul-de-sacs.</p>
	<p><u>DG11: Movement and Legibility</u></p> <p>Pg. 125 (DG11): We welcome the prioritisation of pedestrian movement (a), the emphasis on improving local permeability and wider connectivity (b) as well as the focus on legible streets and spaces (c) and €.</p> <p>Pg. 126: The section on inclusive design stops short of tackling some of the more difficult issues, such as delineation of street space, use of ‘non-conventional’ surface materials, colourful crossings, tactile paving and pedestrian/cycle shared use. It would be helpful to provide some locally specific guidance based on best practice.</p>	<p>No change - the content of the Inclusive section is considered to be sufficient in outlining the key principles and priorities for delivering inclusive design. The document is not intended to be overly prescriptive with regards to detailed design as referenced in paragraph 1.11.</p>
	<p><u>Healthy Streets</u></p> <p>Pg. 138 – 140: We welcome the comprehensive section on the Healthy Streets Approach and how it should be applied</p> <p>Pg. 139 (5.235): We agree that different streets will require different solutions. However we think the word “almost” could be removed – while it is recognised that some streets will always have a greater role in moving high volumes of traffic (especially freight and buses) than others, we believe that all streets within Bromley, can and should be improved in line with Healthy Streets principles when and if the opportunity arises.</p>	<p>No change - The use of the word ‘Almost’ in paragraph 5.235 is considered appropriate; it reflects the presence and role of some key roads within the borough where the primary function is moving high volumes of vehicular traffic.</p>
	<p><u>DG16: Healthy Streets</u></p> <p>Pg. 140 (DG16): We strongly support the contents of the Healthy Streets policy and its application to all development proposals</p> <p>A potential omission from the document is the inclusion of advice on designing for personal safety and security. TfL would like to see references to issues of road safety (Vision Zero) in the sections on Movement and Legibility and Healthy Streets as well as wider considerations of personal safety and security (including perceptions) when considering all aspects of Urban Design but particularly the Public Realm, Movement and Legibility and Healthy Streets sections. In many cases these considerations will reinforce the case for good design e.g. of lighting, natural surveillance, landscaping, wayfinding and the need to maximise connectivity, permeability and legibility.</p>	<p>Change - Safety is referenced throughout the guidance including within the Inclusive, Public Realm, and Healthy Streets sections of the document. In terms of wider considerations of personal safety and security, a section on Designing Out Crime section has been added.</p> <p>The contribution of good urban design in tackling the climate crisis is referenced throughout the Sustainability section of the document which includes guidance on the importance of sustainable construction, green infrastructure, urban greening, and adaptability and resilience. An additional paragraph referring to the Urban Greening Factor has been added.</p>

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	Similarly, the contribution of good urban design to tackling the climate crisis is underplayed – for example, the importance of tree planting, sustainable drainage, green infrastructure, the circular economy, urban greening factor (UGF). UGF is not covered, for example, in the section on Urban Greening.	
Residents Association	This is a very thorough and detailed draft, and we recognise the limits within which it is drafted. We note the admirable objectives in paragraphs 1.3, 1.6, and 1.7. We note the recent approval of a 12 storey building on the High Street, there is no sign that this building will form part of a general overarching plan. References made to para 5.33 and 5.192 in relation to impact on local infrastructure. Our concern is that there is no overarching masterplan for the Town Centre which will result in the continuation of fragmented design/random new buildings. There is also no masterplan relating to infrastructure.	No change – we recognise the need for holistic consideration of applications in Bromley Town Centre, with regards to design, infrastructure and other issues. The provision of/requirement for an infrastructure masterplan for Bromley Town Centre is beyond the scope of the Urban Design SPD. The Council is preparing an SPD for Bromley Town Centre which will have more relevance to the issues raised by the respondent.
Landowner	A central characteristic of good design and successful places is promoting appropriate land uses within appropriate locations. For example, town centres are facing structural changes as a result of an increasing shift to online shopping combined with a rising trend to shop locally following the Covid-19 pandemic. It is essential that these town centres are flexible to adapt to these changes to retain their competitiveness and vitality. This can include promoting a wider range of uses within town centres beyond traditional retail, such as leisure, cultural, residential, office and community uses, to attract people to live, work and dwell in town centres. We consider that a land based principle should be identified within the SPD. This should identify appropriate uses within the identified borough 'places' set out in Figure 2, which in turn should promote flexibility and diversity of uses within Bromley Town Centre.	No change - The importance of creating a wide range of uses and activities to provide diversity, variety and choice is referenced in the 'Mixed-Use Development' section contained within the 'Responsive' design principle. The ability to be flexible and to adapt is referenced in the Adaptability and Resilience section contained within the 'Sustainable' design principle. As such it is not considered necessary or appropriate to introduce an additional land use based principle within the Urban Design SPD.
	In general, the contextual design principles are sensible and align with adopted regional and local policy. We note that central government guidance states that SPDs should build upon and provide guidance on policies in an adopted local plan. We question the extent to which some principles reflect the wording of the adopted policy, rather than providing additional borough and place specific guidance, e.g. DG2 repeats NPPF and London Plan policy. On this basis we consider this guidance note to be unnecessary and its inclusion should be removed.	No change - reflecting the wider NPPF/London Plan framework is considered key to making the document robust.
	In relation to DG3, we note that part (a) requires development to be consistent with, and appropriate to, the existing urban grain. Paragraph 3.44 recognises that The Glades' large footprint contributes to the east-west severance within Bromley town centre. The draft Bromley Town Centre SPD encourages developments that improve east-west connectivity within the town centre and to be consistent with this DG3 should be reviewed so as not to restrict development options that make improvements to the existing urban grain and enhance permeability.	No change – the Council agrees that increased permeability is important and notes that DG3 does not restrict development options; the guidance encourages permeable routes and connections to be preserved and enhanced, and highlights the importance of legibility, good pedestrian routes and active frontages; these should be key components of any new development.
	We support DG7 which encourages all mixed use development to seek to achieve diversity and choice through a mix of compatible uses and activities that work together to create and support viable places.	No change – support noted.
	DG12 appears to conflate the matters of engagement and inclusive design by reference to 'meaningful early engagement' and achieving 'highest standards of inclusive design' within the same guidance note. It is considered that separate guidance notes should be provided to clearly address each of these objectives.	No change - Meaningful engagement with relevant user groups is a fundamental requirement for delivering inclusive design; it is important to place people at the heart of the design process. Other requirements for public engagement would also apply as part of the planning application process.
Landowner	The NPPF states that 'all guides and codes should be based on effective community engagement and reflect local aspirations'. There is little evidence of community or stakeholder engagement beyond the statutory process to assist in understanding what is special, needs protecting, and what needs to be improved.	No change - Local residents, local interest groups, developers and statutory consultees have all been involved in the consultation process. The consultation process is considered appropriate given the borough-wide scope of the document.
	To an extent this guidance repeats what is said at a national level and is less clear on what it means for Bromley.	No change – while the document does reflect national guidance, it does not merely repeat it. The supporting text for each section follows a clear structure; beginning with an introduction to the topic, relevant policy context, key aspects, local context/approach, and specific requirements. Rooting the text within the wider NPPF/NDG/London Plan policy framework is considered key to making the

Respondent	Consultation response	How has response been addressed?
		document robust. Specific policies are signposted within the Design Guidance Notes.
	The document would benefit from a clear checklist as to what is expected from applicants in terms of submission material and process.	No change - Key submission material is already referenced within the planning application process section in section 2 of the document. A list of validation requirements is not included within the document, as these are provided separately online and not within the remit of the SPD.
	The design principles set out in the document are comprehensive and relate back to the National Design Guide. They reflect the approach taken within our vision at St Mary Cray by advocating for design that achieves broader outcomes – connecting communities, enabling access and inclusion and promoting healthier and more sustainable lives. We welcome the emphasis on ‘place’ and the aspiration to start ‘with people first, the space, then buildings’.	No change – support noted.
	There are significant disparities in the level of guidance provided for each section (i.e. 11 pages for shopfronts and 2 pages for Nature). The guidance would benefit from less detail and focusing on the overall outcomes the Council wants to achieve. Shopfronts or housing design could be separate and signposted from this guidance to make it more legible and proportionate.	No change – there are some aspects of the document that will naturally warrant greater levels of detail. The level of detailed design guidance provided is considered to be appropriate. The six Design Principles reflect the overall outcomes that the Council want to achieve. Creating separate design guides for different elements is not considered preferable to having one dedicated Urban Design SPD; it should be noted that the relevance of each section/element will vary from scheme to scheme.
	Section 4.6 states that the ‘achievement of a successful outcome is a shared responsibility between the various professionals/disciplines involved’ but there is little mention about the process of engagement or the council’s expectations of applicants. Engagement is critical to the delivery of inclusive design and achieving the broader principles set out in the document and we’d encourage the council to set out minimum requirements for how this should be achieved within the development process.	No change – the Council considers that the minimum requirements for applicants are sufficiently referenced at various points in the SPD, notably section 2 and paragraph 4.5.
	Whilst the choice of exemplar schemes is inspiring, it is disappointing that a design guide for Bromley has no pictures of the borough in it. We are pleased to see that the document includes schemes designed by [our firm]. We’d encourage the Council to ensure they have copyright to use the images and would be happy to support that process from our own library if required.	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.

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	<p>Page 1 references the green belts role in protecting Bromley's special character. Large areas of Green Belt are designated as 'Borough Places' in chapter 3 (Darwin & Green Belt Settlements, Eastern Green Belt) – areas with distinct character referred to as open countryside. In reality the green belt is complex with individual buildings and villages set within it, as well as golf courses, and the substantial airport at Biggin Hill. The urban edge is also a key part of this character but there is limited reflection of its qualities or how some of the poor quality development that characterises certain areas can be addressed.</p> <p>Many of the 'Borough Areas' have had their character defined by urban sprawl and encroachment into the countryside according to the descriptions. Section 3.63 specifically references development within the green belt being a key part of the areas character. We would welcome the guidance setting out how development can positively respond to the green belt – understanding the urban edge, townscape and village settings, view corridors and green infrastructure is critical to a positive conversation about urban infill, regeneration and development opportunities. We feel that further analysis is required to better understand the relationship between built areas and green belt and where opportunities might lie.</p> <p>Section 5.166 specifically states that 'Development proposals within/adjacent to Green Belt, Metropolitan Open Land, or within rural parts of the borough will be required to adopt a landscape-led approach in order to ensure that scheme layouts evolve from the existing environmental features and natural characteristics of Bromley'. We welcome this approach and feel it will be particularly important in addressing development on the urban/ rural edge.</p> <p>We think given the emphasis placed on Green Belt, there could be greater emphasis on green and blue infrastructure across the borough. Landscape-led development should play a critical role in achieving these broader principles.</p> <p>Biodiversity Net Gain has been omitted despite the national requirements set out in the Environment Act. We would encourage the council to ensure they are meeting and exceeding the targets and being clear about the expected principles of an approach (e.g. on-site vs off-site).</p>	<p>No change - Officers consider the Character Appraisal (Section 3) to be sufficient in providing an understanding of the relationship between built areas and green belt.</p> <p>Change – The Council agrees that a reference to Biodiversity Net Gain would be relevant. A new section on biodiversity has been added which includes reference to biodiversity net gain, and reference has also been added to relevant design guidance notes.</p>
Landowner	<p><u>Good Growth, Innovation and the Design-led Approach</u></p> <p>Whilst we agree that a design-led process should begin with an analysis of local character and context, we believe that the SPD should avoid placing an overriding emphasis on 'preserving' and 'safeguarding' existing character in order to positively embrace opportunities for appropriate improvement, growth, and innovation.</p> <p>The SPD refers to preserving and enhancing the 'existing qualities of the borough's townscape, landscape and streetscape character'. This implies that it is the 'qualities' that need to be preserved and enhanced. Whilst 'preservation' is likely to be of greater importance in sensitive locations such as those affecting heritage assets, Green Belt or AONB, it is important that the SPD more broadly encourages "<i>appropriate innovation or change</i>" in accordance with the National Planning Policy Framework (NPPF) (Paragraph 30).</p> <p>Related to this, it is noted that Local Plan Policy 37 does not require existing character to be preserved either, and instead it requires proposals to make a positive contribution to the street scene and to deliver a high standard of design and layout. Supporting text to this policy confirms that the intention of the policy is to ensure that new development makes a positive contribution to the area. We suggest that the SPD should place less emphasis on preservation and instead positively outline the need for proposals to enhance the local area through adopting a design-led approach. The SPD would in this way clearly articulate support for good growth principles and innovation.</p> <p>The SPD should embrace a common thread of innovation, change and growth as a key design principle throughout. Whilst the SPD acknowledges good growth in the policy backdrop to the guidance, it is important that this is translated through into the subsequent sections to positively embrace change in order to accommodate the growth that the borough needs.</p>	<p>No change - The document reflects the importance of understanding existing local character and recognising emerging contexts/opportunities for change as referenced in paragraphs 2.3, 2.16, 3.24, 4.15, 4.16. The need to balance and manage the relationship between existing character and growth is reflected in the Council's Contextual and Responsive Design Principles and the supporting text. The importance of adopting a design-led approach is highlighted in paragraphs 4.14-4.16.</p> <p>Increasing housing delivery is beyond the scope of this SPD, the purpose of which is to improve design quality. The SPD will not have an adverse impact on housing delivery.</p> <p>The document is a Borough Wide Urban Design SPD, guidance is applicable to renewal areas which are referenced within the Section 3 Character Appraisal. The scope and purpose of Section 3 is outlined in paragraph 1.17. Opportunities to create new character and identity and the adoption of a particular design approach are outlined in paragraphs 5.37 and 5.38.</p>

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	<p>Renewal Areas:</p> <p>The above comments should be given greater weight in relation to Renewal Areas within LBB. The Local Plan explains that the borough is home to five designated 'Renewal Areas'. The Local Plan provides a series of policies (Policy 13 – 19) for the Renewal Areas, providing support for the development of housing within them and for proposals that provide demonstrable economic, social and environmental benefits.</p> <p>The SPD should therefore also provide support for proposals that maximise opportunities for enhancement and improvement, steering development to complement and enhance character as required by policy, rather than preserving the existing.</p> <p>While the SPD provides a character appraisal of the Borough Places, inclusive of the Renewal Areas, it should be made clear that these provide high-level place-wide appraisals which provide a starting point for more detailed character appraisals which should be carried out when applying the design-led approach to site optimisation.</p> <p>In this regard, it should also be acknowledged that larger sites provide an opportunity to create new character and identity. This would particularly be the case in Renewal Areas where the Local Plan is seeking that opportunities for enhancement and improvement are maximised, and where existing buildings and spaces may be of poor quality design.</p>	
	<p><u>Tall Buildings</u></p> <p>We support the recognition within the SPD that: <i>“Well-located and well-designed tall buildings can provide important urban landmarks and much needed homes and commercial space at increased densities. They can also facilitate wider regeneration benefits and more efficient use of land”</i>. Other benefits of tall buildings, as outlined at paragraph 3.9.1 of the London Plan, should also be set out in the SPD. These benefits include:</p> <ul style="list-style-type: none"> • Tall buildings can facilitate regeneration opportunities. • They contribute to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. • They can also help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. • Tall buildings that are of exemplary architectural quality, in the right place, can also make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity. <p>Taking account of the above, it is important that the SPD does not preclude the delivery of appropriately designed tall buildings which have been developed following a design-led optimisation process.</p> <p>The SPD confirms that the Council will seek to identify suitable locations for tall buildings in the Local Plan review, and we consider this to be the correct approach where appropriately justified with a detailed evidence base as required by the London Plan. Notwithstanding this, as confirmed by the Master Brewer (2021)¹ High Court judgement, there should not be a blanket prohibition of tall buildings outside of identified locations. The High Court in this case held that a tall building should be assessed against the potential impacts outlined in London Plan Policy D9 (Part C), as opposed to assessing the impacts in a vacuum.</p> <p>As such, policies and guidance (including this SPD) should not preclude the detailed case by case, and site-specific, consideration of the suitability of sites for tall buildings as part of the development management process. This should be made clear within the SPD.</p>	<p>No change - The benefits outlined are highlighted in paragraph 5.26 which references the wider regeneration and landmark/wayfinding benefits. The potential of well-connected sites is referenced in paragraph 5.29. The importance of exemplary architectural quality is outlined in paragraph 5.32. Additional relevant London Plan policies are referenced in DG4.</p> <p>The SPD does not seek to preclude the delivery of appropriately designed tall buildings; important factors to be considered in relation to the siting of tall buildings are highlighted in paragraphs 5.27-5.29. These considerations are applicable to all sites including those which may propose the replacement of an existing tall building.</p>

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	<p>It is also noted that there may be existing tall buildings which could be brought forward for redevelopment. In these cases, the SPD should provide support for replacement tall buildings where they deliver improvements in design quality and provide opportunity to enhance the prevailing local character. The SPD should also more clearly support replacement tall building proposals where they contribute to meeting other policy considerations such as site optimisation or re-provision of existing housing. This would also help to ensure that developments are viable and therefore deliverable.</p>	
	<p><u>Open Space and Play Space</u></p> <p>The SPD suggests that new developments should exceed the standards for open space provision in areas identified as having limited access to open green space. This would be challenging to achieve on constrained sites; therefore, this matter should be considered on a case by case basis. Optimising development on brownfield land necessarily involves balancing various planning considerations to ensure viable and deliverable schemes; as such, the SPD should incorporate flexibility to allow for site constraints to be considered.</p> <p>DG14 of the SPD relates to the provision of amenity space, and the general principles of this are supported. In relation to part e) which states all development should “provide play opportunities for at least three stages of childhood” it is considered that the wording should be amended to allow play space provision to be considered on a site specific basis having regard to: play audits inclusive of existing off-site play opportunities, and the proposed child yield. For example, where a site is located in close proximity to existing play facilities and/or a development only yields a small number of older children; on-site provision could result in less usable play spaces and could preclude appropriate site optimisation. Instead opportunities to improve off-site play opportunities could be considered, and this would have benefits for the wider community. Consideration could also be given to alternative amenity provision, such as indoor amenity opportunities.</p>	<p>Change - The potential difficulty in exceeding the minimum standards for open space provision for challenging and constrained sites is noted. DG13 has been amended to state that new open space “should seek to exceed the minimum spatial and qualitative requirements”.</p> <p>DG14 reflects the requirements of London Plan Policy S4; reference to this policy has been added.</p> <p>DG14 does not stipulate ‘on-site’ provision.</p>
	<p><u>Dual Aspect</u></p> <p>Paragraph 5.90 and 5.91 of the SPD outline that dual aspect homes are an “important requirement.” Whilst dual aspect homes should be maximised in accordance with the London Plan, Policy D6 also acknowledges that single aspect dwellings can be provided where it is considered a more appropriate design solution to optimise site capacity. The SPD should be amended to be consistent with the London Plan.</p>	<p>No change - it considered appropriate to highlight the importance of dual aspect units in relation to daylight/sunlight, outlook and cross ventilation; the SPD does not preclude delivery of single-aspect units where justified. Policy D6 of the London Plan is referenced in DG6 under relevant policy and guidance.</p>
	<p><u>Tenure Blind / Neutral</u></p> <p>The SPD refers to development proposals being tenure blind / tenure neutral, and defines this as “no distinction between the visual appearance and general location of different tenures.” Whilst this is supported as a general principle, as a positive step in creating diverse, inclusive and equitable communities; it is important that management considerations are taken into account. This is because shared cores with mixed tenures can result in service charge implications, which in turn can negatively impact upon affordability. The SPD states: “Options for mixed tenure housing include fully mixed, pepper-potted, segmented and clustered layouts” and “Flatted developments should include shared entrance cores and ensure that communal facilities are available and accessible for all residents. It should be noted that mixing tenures by whole building rather than by stair cores rarely achieves an acceptable degree of mixing.” It is considered that these approaches would raise challenges in respect of servicing charges and affordability; therefore, these parts of the guidance should be removed.</p>	<p>No change - the provision of tenure blind / tenure neutral homes is important. Inclusion and social diversity are key considerations in design and should therefore be prioritised; if there are evidenced issues in terms of building management or service charges, the SPD does not rule out separate entrances.</p>
Landowner	<p>2 Legislative and Policy Context</p> <p>2.1 The National Planning Policy Framework (NPPF) defines SPDs as:</p> <p>“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning</p>	<p>No change - The Council acknowledge the role of SPDs in section 1. The purpose of the document is to set out the key principles for achieving good design and to provide clear design guidance (rather than setting rigid parameters). All schemes will be assessed against the six overarching principles (paragraph 4.19) that are considered essential components in delivering good design.</p>

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	<p>decisions but are not part of the development plan (Annex 2, page 27, NPPF 2021).” [emphasis added]</p> <p>2.2 The government guidance on plan-making in paragraph 008 Reference ID: 61-008-20190315 also provides guidance on plan-making, advising that the role of SPDs is to:</p> <p>“...build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.” [emphasis added]</p> <p>2.3 Whilst we understand and appreciate the need for new guidance to be published, we consider that the Draft SPD should set out ‘best practice’ development, rather than set rigid parameters for every development in the Borough to follow.</p> <p>2.4 We support the overall objectives of this SPD, to guide design principles of emerging planning applications throughout the borough. We would like the draft SPD to acknowledge that schemes can still come forward that do not align with each principle as set out within the document but are still considered appropriate and well-designed, responding well to their context.</p>	
	<p>Growth and Design-led Approach</p> <p>3.1 We support the aspirations of the Draft SPD, which seeks to ensure high-quality design within emerging development within LBB, aligning with the vision set out within the Bromley Local Plan, which recognises the high quality living, working, historic and natural environments within the Borough. We support the SPD’s key role in raising the quality of spatial, urban and architectural design in Bromley which will, in turn, ensure continued investment and economic growth within the Borough.</p> <p>3.2 We observe that in achieving its aims, the SPD places great emphasis on preserving the existing built form and character, ‘stitching new development into the existing urban fabric.’ While this is of key importance in more sensitive areas, such as those containing heritage assets, Green Belt or AONB, the SPD should also promote innovation and change, as set out within point 3.1.7 of the London Plan, which places emphasis on evolution and growth:</p> <p>“3.1.7 As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place’s distinctive character, recognising that not all elements of a place are special and valued.”</p> <p>3.3 We also note the Bromley Local Plan (2019) uses different terminology in regards to the existing built environment, such as ‘respect’, ‘positively contribute’ and ‘enhance’ rather than ‘preserve.’ As such, we encourage the SPD to change its emphasis from preserving the existing built environment to positively contributing to character, to allow for change within the Borough in accordance with the Development Plan.</p> <p>3.4 Linking to this, we consider ‘Good Growth’ a key element of the London Plan which has not been strongly translated into the SPD. Good growth focuses on embracing and managing change in the urban environment, as well as optimising site capacity with regard to housing needs, to accommodate growth in an inclusive and responsible way, would also like to note that LBB’s 10-year housing target has significantly increased through the London Plan (7,740 homes) since the adoption of the Local Plan (6,410 homes). This equates to an increase of 133 homes per annum. The latest Bromley Housing Trajectory sets out the Borough can only supply 3.99 years which is a significant undersupply. As such, we encourage the SPD to take a firmer</p>	<p>No change - The document reflects the importance of understanding existing local character and recognising emerging contexts/opportunities for change at various points. The need to balance and manage the relationship between existing character and growth is reflected in the Council’s Contextual and Responsive Design Principles and the supporting text. The importance of adopting a design-led approach is highlighted in paragraphs 4.14-4.16.</p>

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	<p>approach with regard to the design-led approach and how it can be utilised to increase housing supply by optimising site capacity.</p>	
	<p>We support the aspirations of Paragraphs 1.6 and 1.7 to raise the quality of spatial, urban and architectural design in Bromley, working towards the growth and regeneration of the borough as a whole.</p> <p>Particularly, we believe that windfall development opportunities should be utilised to deliver the wider aims and objectives of housing and growth of the adopted plan, considering its housing delivery shortfall. Great weight should be put on applications that can transform fragmented town centre townscapes into a more cohesive coherent environments, by introducing more legible and accessible routes.</p>	<p>No change - all applications are assessed on their own merits, the importance of introducing more legible and accessible routes is highlighted in the SPD, particularly in DG11.</p>
	<p>We strongly support Paragraph 1.11 as it highlights the need for flexibility in the planning system. Overly prescriptive requirements hinder a site's ability to come forward and respond to site-specific circumstances in a design-led approach, as outlined in London Plan Policy D3.</p>	<p>No change – support noted.</p>
	<p>The SPD should make due regard to the London Plan's Tall Buildings Policy D9 within paragraph 3.50. Guidance should encourage the opportunity for density within sustainable, high PTAL rated areas next to transport nodes, where they do not unduly impact areas of different character.</p> <p>Whilst there is a change in character areas between the town centre and some surrounding areas, this should not preclude or alter the presence of taller buildings within the locality, should the overall requirements of D9 be met, which have a specific set of policy tests for taller buildings to meet.</p> <p>Of particular importance is the consideration of short, mid and long term views within any proposal, which would be an accurate way of assessing sites in Bromley. This would consider the differences between the residential settings and the town centres.</p>	<p>No change - paragraph 3.50 forms part of the character appraisal for Bromley Town Centre within Section 3, the purpose of which is to provide key information about Bromley as a place; it is descriptive and based on fact as a precursor to design guidance provided in Sections 4 and 5. As such it is not appropriate to reference specific design policies in Section 3.</p> <p>Guidance on tall buildings including key siting and design considerations is provided in DG4 and preceding paragraphs. London Plan Policy D9 is referenced throughout the tall buildings section.</p>
	<p>A design-led approach referenced in paragraph 4.14 is strongly supported and should underpin the SPD as a whole. We feel the overall ethos of the design-led approach may be practically obstructed through the adoption of an SPD that suggests how a proposal within Bromley should be adhered to. The Draft SPD should go further and recognise that these are indeed guidance points, allowing applicants to channel paragraph 3.1.7 of the London Plan, which outlines:</p> <p style="padding-left: 40px;">“As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.”</p>	<p>No change - the overall ethos of the design-led approach will not be practically obstructed through the adoption of this SPD. The role and status of the SPD is clear, and as referenced above, the document reflects the importance of understanding existing local character and recognising emerging contexts and opportunities for change.</p>
	<p>Paragraph 5.3 should be altered to incorporate an area's wider potential, including the presence of emerging schemes. Weight is provided to emerging character and context in Policies D3 and D9 of the London Plan and it is recommended that the Draft SPD reflects this.</p>	<p>No change - the need to understand the wider context is highlighted in DG1 and paragraph 5.6, while the requirements of London Plan Policy D9 are reflected throughout the tall buildings guidance section.</p>
	<p>We support development coming forward that make a positive contribution to its wider setting. In reality, townscape visual impact assessments (TVIAs) will be undertaken on major development proposals and will assess a scheme's impact upon its wider setting, in line with London Plan Policy D9.</p> <p>Many applications for taller buildings in London are consented on balance, considering the substantial amount of public benefits provided (such as affordable housing), while having no significant negative impact on surrounding townscape views. The wording of DG1 should be altered to reflect this. We consider that it is possible to respect and conserve existing heritage values and offer an amount of planning benefit that is, on balance, acceptable to decision makers.</p>	<p>No change - DG1 summarises the importance of understanding local context, character and identity. The potential wider benefits of, and considerations for tall buildings are highlighted in paragraph 5.26 and DG4. The relevance of other public benefits would be determined on a case by case basis.</p> <p>In the context of Bromley, which has a predominantly low-rise suburban character, tall buildings are likely to have a greater impact on surrounding townscape views compared with applications for tall buildings elsewhere in London. The narrative and wording of DG1 (and DG4) is considered to be appropriate.</p>

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	<p>It is suggested that this is reworded to 'all developments proposals should respond to their setting and seek to avoid substantial harm to local character and identity'.</p> <p>We would also recommend that the title of DG1 is altered, as it sets a narrative in the SPD that places aren't able to change:</p> <p>DG1: Creating High-Quality Places</p>	
	<p>We do not support the wording of DG3 on the basis that urban grain is susceptible to change over time and this should not be prevented. This is not in accordance with Policy D1 of the London Plan which relates specifically to an area's 'capacity for growth' in which urban grain is cited as a consideration for this.</p> <p>We recommended that the wording is amended to: a) 'Respond to an area's existing urban grain and capacity for growth appropriately.'</p>	<p>No change - All applications are assessed on their own merit; in cases where the established urban grain is changing, the proposal could address this as part of design justification. As highlighted in DG3 all proposals should seek to <u>create</u> a coherent pattern of development.</p>
	<p>The first sentence (of para 5.20) implies that townscape character is dependent on scale. The GLVIA defines townscape as the "built-up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces". Para 5.21 is more representative of this definition.</p>	<p>No change – comment noted.</p>
	<p>Para 5.27 - We encourage LBB to use evidence to justify this paragraph. London Plan D9 makes it clear that sustainable locations for tall buildings should be identified in local plans. Prevailing heights and context are a factor in determining locations for tall buildings.</p>	<p>No change - As stated in paragraph 5.25 the Council will seek to identify suitable locations for tall buildings as part of the Local Plan review. Prevailing heights are particularly important in determining heights for new development proposals, not just Local Plan preparation.</p>
	<p>We do not support the current wording of Paragraph 5.33 as the capacity of the local area and transport networks may be improved via financial and non-financial planning obligations. Therefore, proposed developments should not be dismissed based on existing local area capacities and transport networks as their contributions should be used to improve these.</p> <p>Furthermore, issues of servicing, maintenance and building management arrangements will be assessed within the planning submission and may be appropriately conditioned.</p>	<p>No change - Paragraph 5.33 does not indicate that development proposals would be dismissed based on existing local area capacities and transport networks, it states that these capacities should be considered as part of the proposal's functional impact. Servicing, maintenance and building management requirements should be considered at an early stage in the design process to maximise opportunities for a successful resolution; leaving functional considerations to be resolved at the end of the process or by planning condition increases the chance of an unsatisfactory solution. The consideration of the functional impact of tall buildings (including these issues) is a requirement of Policy D9 of the London Plan.</p>

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	<p>We disagree with the wording of the opening section of DG4 on the basis that development proposals should be analysed holistically in terms of overall benefits. Tall building proposals should not be refused based solely on a 'positive contribution to the townscape' as their benefits may outweigh any townscape harm caused by the development.</p> <p>It is recommended that this wording is amended to read 'development proposals for tall buildings should not negatively impact the townscape, ensuring that their massing, scale and layout responds to the character of the surrounding area'.</p> <p>We are in support of new developments being of the highest architectural design quality, which should be achieved through engagement with Urban Design Officers and Design Review Panels.</p> <p>However, we dispute that this must be achieved through a base, middle and top strategy, as this restricts proposed developments which do not conform to this rigid description. It is recommended that this is removed to allow some design flexibility on a site-by-site basis.</p> <p>We consider Part C of DG4 to be too simplistic in its approach, in opposition to Paragraph 1.11 of the Draft SPD.</p> <p>The design forms mentioned will likely be architectural considerations for all tall buildings, however, they are not the only design forms which might be used to mitigate any transition in scale.</p> <p>Therefore, it is recommended that this is removed and replaced with 'seek to achieve an appropriate transition in scale by considering a variety of design forms which help to reduce the appearance of being dominant and overbearing'. To be informed along with townscape and visual impact assessments where appropriate.</p> <p>We understand that the location of 'marker' or 'gateway' buildings will need to have justification underpinning them. However, the use of 'landmark' and 'marker' in this context is entirely subjective without having any consented policy in place outlining or defining what this built form is categorised as.</p> <p>It is recommended that Part D of DG4 is removed to ensure compliance with the adopted plan.</p>	<p>Change - DG4 does not imply that tall buildings should be refused based solely on the basis of appearance; the SPD sets out a range of considerations, and the relevance of other benefits would be determined on a case by case basis.</p> <p>The reference to adopting a clear base, middle and top strategy reflects the requirements set out in paragraphs 3.9.6 - 3.9.8 (Policy D9) of the London Plan.</p> <p>DG4 (c) <u>suggests</u> different options to achieve an appropriate transition in scale and to avoid a dominant and overbearing appearance. This wording has been amended to clarify that a variety of design forms could be suitable.</p> <p>It is agreed that the functional attributes of 'marker' or 'gateway' buildings are subjective, hence the requirement for a strong evidence-based townscape assessment as stated in DG4 (d).</p>
	<p>We disagree with this statement on the basis that it is too prescriptive and overgeneralises the use of brick slips. Therefore, it is in direct opposition to Paragraph 1.11 of the Draft SPD.</p> <p>Developments should be permitted to use a range of materials where appropriate, as stated in the London Plan Policy D3. Brick slips can enable a development to offer other benefits, such as keeping with local character.</p>	<p>No change - Paragraph 5.52 states that the use of brick slips will not be accepted in <u>most</u> cases, it does not state in <u>all</u> cases; an assessment of appropriate materials will be made on a site-by-site basis taking relevant factors into account (i.e. context, character, scale etc).</p>
	<p>Considering that the colouring of a building may be altered through permitted development, we recommend that Paragraph 5.55 is removed. The materiality of a scheme should be considered by Design Officers on a site-by-site basis and Paragraph 5.55 should be removed.</p>	<p>No change - Colouring is just one of many factors to be considered in relation to retaining a sense of harmony and continuity between new and existing buildings as stated in paragraph 5.55. The potential for colouring to be altered via permitted development is not relevant in this context.</p>
	<p>We disagree with the statement that projecting balconies would not be suitable where they are 'out of character'. A variety of balcony types provide different qualities and the suitability will depend on the make-up of the buildings elevation and how that responds to its near neighbours.</p> <p>Therefore we suggest paragraph 5.70 is removed and replaced with:</p> <p>'Balcony quantum, design, type (e.g., recessed or projecting) and placement should be guided by environmental factors, visual impact and street scene character.'</p>	<p>No change - Paragraph 5.70 does not state that projecting balconies would not be suitable where they are out of character, it simply states that recessed balconies can reduce the visual impact on the streetscene and are <u>typically</u> more appropriate in areas where projecting balconies would be out of character.</p>

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	<p>We do not support the wording of these paragraphs as they are overly prescriptive.</p> <p>The guidance should be altered to state:</p> <p>'balconies can appear overly 'heavy' if not carefully considered. The design of balustrading, its openness, transparency and materiality should respond to the materials of the building envelope and the character of the area.'</p>	<p>No change - paragraphs 5.72 and 5.73 are not considered to be overly prescriptive; paragraph 5.72 states that solid, enclosed balconies <u>can</u> appear overly 'heavy' (as opposed to open balustrades which <u>can</u> appear 'lighter'). Paragraph 5.73 states that glazed balustrades <u>can</u> appear generic. The purpose of these paragraphs is to highlight the issues that should be considered during the design process in relation to balcony design.</p>
	<p>We do not support the current wording of DG5 as it is overly prescriptive and it is in opposition to Paragraph 1.11 of the Draft SPD.</p> <p>We suggest DG5 should be redrafted to follow:</p> <p>'b) Ensure that materials relate well to the architectural style and ethos of the scheme, i.e. traditional materials for a local vernacular approach, new materials for a more modern approach/methods of construction. The use of high-quality, durable materials is an essential requirement for all development proposals.'</p>	<p>No change - the wording of DG5 (b) is not considered to be overly prescriptive; this part of the guidance simply states that the choice of materials should relate to the architectural ethos of the scheme. DG5 does not prescribe the use of one material over another.</p>
	<p>We do not support the inclusion of Paragraph 5.90 as it is currently drafted. Internal corridors are a design structure often required to optimise sites and minimise single aspect development, in accordance with Policy D6 of the London Plan. Paragraph 5.90 should therefore be removed.</p>	<p>No change - Paragraph 5.90 states that long hotel-like corridors serving single aspect flats <u>should</u> be avoided, i.e. wherever possible. It does not state that they <u>must</u> be avoided in recognition that internal layouts can be subject to site constraints. Policy D6 of the London Plan is referenced in DG6 under relevant policy and guidance.</p>
	<p>The delivery of infrastructure should not impact upon the deliverability and viability of any scheme, as it has the potential to impact upon other planning benefits, such as Affordable Housing.</p> <p>It is recommended that this statement should read 'large developments should also provide appropriate infrastructure, subject to viability, to future proof development, for example provision of new cycle lanes.'</p>	<p>No change – the SPD states that larger development proposals <u>should</u> provide appropriate infrastructure to future proof development, for example provision of new cycle lanes. It does not specify that particular infrastructure <u>must</u> be provided in recognition of site-by-site deliverability and viability considerations. The SPD references the Planning Obligations SPD which provides further guidance on such requirements.</p>
	<p>We strongly support Paragraph 5.202 as it references the development of all scales and the importance of connectivity within Bromley.</p> <p>This statement is in accordance with Policy T3 of the London Plan as it notes the importance of connectivity and the relationships between sites, as well as their wider context which promotes strong holistic growth within the borough.</p>	<p>No change – comment noted.</p>
	<p>We support the aspiration of DG11 and the importance of accessibility within new urban development.</p> <p>In regards to point a) pedestrian priority should be incorporated within schemes, whilst also accommodating the safe, functional inclusion of access by other modes where necessary for the development.</p>	<p>No change – comment noted.</p>
	<p>There should be a recognition in DG17 that including all prescribed design features are not feasible/viable for every new development.</p> <p>It is recommended that DG17 should be amended to say 'all development should seek to achieve the highest standards of sustainable design and construction, where feasible and viable, in accordance with the London Plan and Local Plan Policies'.</p>	<p>No change - DG17 states that all development should <u>seek to achieve</u> the highest standards of sustainable design and construction. The guidance note highlights the key elements that should be considered. The sustainability credentials of individual schemes will be assessed on a site-by-site basis, and applicants will need to demonstrate that policy requirements have been met; non-conformity with policy on the basis of viability will need to be justified.</p>
	<p>4 Conclusion</p>	<p>No change – comment noted.</p>

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	<p>4.1 In summary, the Draft SPD is not fully supported, predominantly on the basis that it is overly prescriptive in part, which is in direct contradiction with Paragraph 1.11 of the Draft SPD.</p> <p>4.2 We look forward to working with you over the coming months to help define an SPD that is deliverable and appropriate.</p>	
Local Group	<p>Fully support the aims of the SPD, and in particular the support for biodiversity in the Nature section on page 106 (clauses 5.170 & 5.171). Suggest adding following wording: Birds cannot easily nest in new urban landscapes so it is important to provide artificial nest sites such as swift bricks - these are a universal nest brick for a wide range of small bird species. Swift bricks are integrated with the building design and do not require maintenance.</p> <p>Also suggest referencing need for swift bricks to be installed in accordance with best-practice guidance, which for example is provided by CIEEM.</p>	Change – Support for the SPD is noted. The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance, including a new guidance note to summarise the section.
NHS London Healthy Urban Development Unit	<p>With regard to the Inclusive design principle - we would welcome greater reference to age and dementia-friendly design and designing for neurodiversity. There are several recent publications providing advice on inclusive design including the RTPI Dementia and Town Planning (2020) the new British Standard Design for the Mind – Neurodiversity and the built environment (2022) which could be referenced.</p>	No change – while the issues suggested for further reference are relevant considerations, the current wording is considered sufficient in terms of consideration of health issues broadly – it is not considered necessary to set out references to different health issues and specify relevant publications for each.
	<p>Paragraph 4.42 should be strengthened to ensure health and well-being benefits are delivered through the use of monitoring frameworks incorporated within S106 agreements or by planning condition.</p>	Change – the Council acknowledges the benefits of monitoring frameworks, and a reference to the use of monitoring frameworks incorporated within S106 has been added in the 'Healthy' section in section 5 of the SPD.
	<p>SPD mentions HIAs in para 4.44 but has no further reference to HIAs within the SPD. This is a lost opportunity and further detail should be provided, HIAs should also be a validation requirement for major applications.</p>	<p>No change – the Council recognises that HIAs can be beneficial in terms of identifying and addressing health impacts of development. However, there is no Local Plan policy for HIAs, only the reference in Objective GG3 of the London Plan. Therefore, it is not possible to introduce a stronger requirement as this would be creating new policy.</p> <p>For the same reason, the local validation requirements cannot currently mandate submission of HIAs.</p>
	<p>DG8 (d) could be strengthened using the words 'require' or 'expected'.</p>	No change - The wording of DG8 (d) is considered to be sufficiently robust.
	<p>DG11 (e) wording could be strengthened in relation to wayfinding and what constitutes good wayfinding.</p>	No change – Elements which aid wayfinding are already referenced in paragraph 5.203 which, when read alongside the accompanying paragraphs within the Legibility section and the content of DG11, provides clear guidance.
	<p>DG12 (c iv) should be expanded to include “lifts to be designed to accommodate an ambulance stretcher with two paramedics and their equipment”.</p>	No change - The wording of DG12 (c iv) is considered to be sufficient.
	<p>Tall Buildings section should contain an additional clause which seeks to ensure that tall buildings are designed to prevent suicides.</p>	No change – ensuring that tall buildings are safe is an important consideration. The SPD guidance on tall buildings already refers to safety.
	<p>It is important that safe and accessible parking for emergency vehicles is provided within schemes along with electric charging points.</p>	No change – the Council agrees that such provision is important. The provision of accessible parking spaces and EVCPs are planning policy requirements, as set out in the Local Plan and London Plan. The SPD does not need to repeat these.
	<p>There are a wide range of design decisions and details which can help support health and wellbeing and we would welcome links in the document to illustrate good practice. For example, the siting of staircases in building lobbies before access to lifts encourages the use of steps and increased physical activity. While these may be small elements added together they contribute to healthier and safer environments.</p>	No change – the Council agrees that there are likely to be a number of relevant considerations on a case by case basis. However, as stated in paragraph 1.11, the guidance within the document is not intended to be overly prescriptive but aims to outline the key design principles that should be followed, detailed design decisions are assessed on a scheme by scheme basis. It is therefore not

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		considered appropriate to provide exhaustive lists of a range of potential best practice documents.
Landowner	Respondent is broadly supportive of the guidance contained within the Council's Draft Urban Design SPD. However, in the context of the Council's poor housing land supply any guidance provided to support the Council's planning policies should ensure that it does not limit the opportunities for sites in sustainable locations to deliver an enhanced built form that offers a suitable range of uses, including the delivery of new homes. Additionally, the PPG confirms that SPDs should not add unnecessarily to the financial burdens on development. Thus, SPD guidance that incurs inappropriate financial burden that has a disproportionate effect on the deliverability of residential development should not be adopted.	No change - The SPD is a positive document which sets out design guidance applicable to planning applications in the borough. Respondent has offered no detail on what the inappropriate financial burden what be, bar a very high level comment that it would render development proposals unviable. The Council considers that the SPD will not unduly restrict development, or add unnecessarily to the financial burdens on development, as the SPD adds further guidance to existing policy.
	<p>DG1 - Whilst it is acknowledged that reinforcing local character and identity is an important element of new development proposals, this should not be too rigorous as to restrict or limit the ability to bring forward new development, or develop a site, to provide a more suitable use that supports the wider regeneration of Bromley.</p> <p>Therefore, it is considered that the wording in DG1 should be updated to provide more encouragement of the redevelopment of underutilised brownfield sites at appropriate locations, where it can be demonstrated that, on balance, the development will not result in unacceptable adverse impacts the local character and identity of the area.</p> <p>In addition to this, DG1(d) provides a vague reference to 'Heritage buildings'. This should be clarified.</p>	<p>Change - The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process.</p> <p>Heritage Asset is defined in the Local Plan, which references the NPPF definition. Minor amendment made to DG1 to clarify definition.</p>
	DG2 - Our client appreciates that preserving and enhancing heritage assets is an important role in the design of any development proposal. However, the wording and guidance included is too ambiguous and does not provide clarity on what may be defined as a heritage asset and thus what this guidance would relate to. Therefore, it is considered that the wording in DG2 should be updated to reflect NPPF paragraph 189.	No change – the Council disagrees that the term “heritage asset” and/or its use within DG2 is vague or unclear. Heritage Asset is defined in the Local Plan, which references the NPPF definition. DG2 references relevant Local Plan policy and NPPF sections.
	In addition to this, DG2(d) again makes vague reference to heritage buildings and should also provide specific details of what the Council define as a heritage asset in order to provide developers with a steer on what sort of design measures will be necessary to ensure that their significance is preserved or enhanced. As currently written, DG2(d) includes too much ambiguity and should provide a definition of heritage assets that follows that provided within the NPPF glossary.	Change – we acknowledge the potential confusion between heritage buildings and assets. A minor amendment has been made to DG2(d) to refer to heritage assets.
	Draft Policy DG2(e) seeks to introduce new policy requirements for development proposals, requiring interventions relating to listed buildings to be flexible, adaptable and reversible. As set out in the PPG, the purpose of SPD is to build upon, and provide more detailed advice on policies in an adopted Local Plan. As they do not form part of the development plan, supplementary guidance cannot introduce new policies. Thus, inclusion of DG2(e) within the SPD is inappropriate and should be removed.	Change - DG2(e) uses a widely recognised sustainable (architectural) approach to reusing/repurposing buildings, including buildings that might be/are considered to be a heritage asset. This criterion does not introduce new policy/policies, it provides further guidance to existing policies in the Local Plan (e.g. policy 123) and London Plan (e.g. HC1). Policy references have been added to DG2 to clarify this. A minor amendment has been made to require 'where feasible', recognising that there might be circumstances where this approach is not possible.
	<p>In regard to DG3(a) the principle of requiring development to respect and maintain existing plot widths is supported, but this is too restrictive in its current wording, which seeks to ensure this is dogmatically required as part of development.</p> <p>Therefore, DG3(a) should be amended to state: “Be consistent with, and appropriate to, the existing urban grain, whilst offering a development that can maximises the development potential of a site and can demonstrate that the design responds sensitively to the surrounding area”</p>	No change - This criterion is worded to ensure the principle(s) of DG3 is applied wherever possible. The design-led approach (London Plan Policy D3) sets out guidance to ensure development proposals are informed by the characteristics of the site. Existing urban typologies – the pattern of development – are considered to be important components of a site's characteristics, and therefore fundamental to achieving well-designed places.
	The implications of DG3(b) are too spurious and would overly constrain development, Respondent suggests the following amendment to this guidance (strikethrough text proposed to be deleted): “Respond to existing building lines and continue established street patterns and frontages where it is an integral part of local character. Permeable routes and connections should be preserved and enhanced”	Change – the Council recognises that there may be circumstances where continuing established street patterns is not possible, therefore a minor amendment has been made to DG2(b) to provide more flexibility.

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	<p>Moreover, it is considered that DG3€ has not been prepared positively and is therefore contrary to plan-making guidance set out within the NPPF. The implications of the guidance are too onerous and confusing. Tall buildings can respond very well to existing streets provided entrances and lower floors address streets appropriately, whilst the second sentence of (e) is contradictory, and neither precise nor relevant. DG3(e) should be reworded to set out: "Ensure appropriate building height in relation to street width in order to retain a human scale and to create a sense of enclosure. Setbacks and projections at upper floor can both support and detract from the public realm. Development proposals should look to provide increased heights, where they are situated within appropriate locations, and it can be demonstrated that they facilitate the creation of a coherent pattern of development"</p>	<p>No change – the guidance is considered appropriate in line with existing policy requirements in the Local Plan and London Plan. The SPD is consistent with the NPPF and statutory requirements.</p>
	<p>In addition, it is considered that the accompanying narrative provided within paragraphs 5.18 to 5.23 are too restrictive and would unnecessarily limit development that can be delivered within Bromley (including its urban centres, such as Bromley town centre).</p>	<p>No change - paragraphs 5.18-5.22 set out best practice and widely used design principles for scale and massing. Paragraph 5.23 provides a very brief overview of the predominate character/urban typology found in Bromley. It does not preclude variations in scale (where conditions allow).</p>
	<p>DG4 – The Council should encourage the development of tall buildings on highly sustainable brownfield sites, with good public transportation links, as is the case with the High Street. Wording suggested to encourage the development of tall buildings where appropriate.</p>	<p>No change - Identifying suitable specific locations for tall buildings would be introducing new policy and is beyond the scope of the SPD. London Plan policies D3 and D9 and Local Plan policy 47 set out the requirements and guidance for tall buildings.</p>
	<p>In addition, amendments are required to the supporting text at paragraph 5.31. As currently prepared, it suggests that all new developments need to present views analysis as part of their application submission. Clarification is required here, and the paragraph should be amended as follows: "All planning applications for tall buildings are required to consider the impact on the setting including key views and heritage assets. Immediate, mid-range, and long range-range views should be carefully considered and included within a comprehensive Heritage and Townscape Visual Impact Assessment."</p>	<p>Change – An amendment has been made to clarify that this paragraph relates to tall building proposals.</p>
<p>Environment Agency</p>	<p>The Environment Agency welcome the draft Design Guide SPD. They feel it could be strengthened further with the following amendments.</p>	<p>No change – comment noted.</p>
	<p>Reference should be made to the pre-planning advice services offered by other statutory bodies, including ourselves. Please see suggested wording below, to be included as a new paragraph after section 2.22. "Where relevant, applicants are expected to engage at the pre-planning stage with the appropriate statutory bodies, such as the Environment Agency, Natural England and Historic England".</p>	<p>Change – the Council agrees that early advice from statutory bodies such as the EA can help to improve the quality of applications. Reference to pre-planning advice services offered by other statutory bodies has been added to section 2.</p>
	<p>We are pleased to see that paragraph 4.48 recognises that the most successful places are adaptable to environmental change. Our latest Adaptation report, Living Better with a Changing Climate, shows that England will inevitably face significant climate impacts, and that early action is essential.</p>	<p>No change – support noted.</p>
	<p>DG4: Tall Buildings – We are pleased to see that this Design Guide principal recognises that consideration should be given to the overshadowing impacts of tall buildings. Tall buildings in the river corridor can have adverse impacts of the ecology of the aquatic environment by preventing sufficient sunlight entering the ecosystem.</p>	<p>No change – support noted.</p>
	<p>We recommend the "Siting and design" section (5.109 page 85) for commercial buildings is updated to include a point on Waste Management infrastructure to ensure waste management sites are designed and operated to high environmental standards and also have the right permits and exemptions in place to prevent environmental issues. Suggested wording provided.</p>	<p>Change - The document has been revised to include a new paragraph to reflect suggested wording. Some of the suggested wording is already covered elsewhere in the SPD.</p>
	<p>DG10: Public realm - We welcome the promoting of public green space and the acknowledgement of its multifunctional uses, more specifically, it's ecological purpose as a drainage area.</p>	<p>No change – support noted.</p>
	<p>DG13: Open green space - Bromley is a highly urbanised area meaning we welcome the plans to increase the access to open green space within the borough.</p>	<p>No change – comment noted.</p>

Respondent	Consultation response	How has response been addressed?
	<p>It is important that green space has an appropriate design in relation to its function, especially regarding potential drainage and flood issues. It is important that any new proposed green spaces consider its impact on the community of the surrounding area from an environmental perspective, as well as socially and economically.</p>	
	<p>DG17: Sustainable design - We support the incorporation of Sustainable Drainage Systems (SuDS) within a highly urbanised setting, such as Bromley. Their ability to closely mimic natural drainage systems will improve Bromley's resilience against potential flood risk. The highly culverted sections of the River Ravensbourne means the catchment may be susceptible to flash flooding in areas of a more open river corridor. SuDs can reduce this risk if used effectively.</p> <p>Developments located within areas at risk of flooding should comply with Bromley's Strategic Flood Risk Advice (SFRA).</p> <p>We would like to draw attention to the potential risks to groundwater posed by SuDS. Much of Bromley is underlain by important aquifers and lies within Source Protection Zones for public water abstractions. Any new proposals should ensure the appropriate protection of groundwater supplies.</p> <p>It is also worth noting that any major developments proposed without a connection to a sewage main will be objected. The sustainable development of large proposals is vital to the protection of groundwater and referencing this within the urban design guide will help in stressing the importance of this.</p>	<p>Change – the Council acknowledges the importance of issues relating to flood risk. The points raised are covered by policies in the Local Plan and London Plan; relevant policy references have added to DG17</p>
	<p>Where the plans references “enhancing biodiversity” or “enhancing the environment”, we recommend that the following terms are used instead:</p> <p><u>Biodiversity Net Gain</u></p> <p>Biodiversity Net Gain (BNG) is defined as an approach to development and/or land management, that seeks to leave biodiversity in a measurably better state than it was beforehand.</p> <p>The use of this terms makes it clearer that the guidance is referring to a quantifiable increase in biodiversity, in line with the requirements of the Environment Bill.</p> <p><u>Environmental Net Gain</u></p> <p>Environmental Net Gain (ENG) is an approach that aims to leave both biodiversity and the wider environment in a measurably better state than prior to development.</p> <p>This could for example include air quality, water quality, flood protection, recreation, water resources, climate change, waste as well as biodiversity.</p> <p>The aspiration for new development to achieve environmental net gain is outlined in the Government's 25 Year Environment Plan.</p> <p>The above terms should be used as appropriate in paragraphs 2.252, 2.255, 2.258, 4.46 and DG11 (d).</p>	<p>Change – the Council recognises the importance of biodiversity. The document has been revised to include a new section on Biodiversity, including reference to BNG.</p> <p>The concept of environmental net gain does not have the same statutory footing as BNG, hence it is not considered appropriate to reference in the SPD at this time. The principles behind environmental net gain are covered in the Development Plan and in various parts of the SPD.</p>
Landowner	<p><u>Section 2 – Policy Framework and Planning Application Process</u></p> <p>The Draft SPD should note that various matters are capable of being material considerations and a balanced judgement is required to determine the level of weight to be given to each consideration, considered against the significant public benefits expected to arise from a scheme, in the context of relevant national, regional and local planning policies and guidance.</p>	<p>No change - The SPD sets out the key policy framework in section 2. It is not appropriate to list all potential material considerations, or to repeat the provisions of S38(6) in the SPD.</p>
	<p><u>Section 3 – Character Appraisal - Understanding Bromley</u></p>	<p>No change – comment noted.</p>

Respondent	Consultation response	How has response been addressed?
	The 1 Westmoreland Road site falls into Bromley Town Centre in the Borough Places Map. We have no specific comments on the description of the character of Bromley Town Centre in the Draft SPD. We welcome the acknowledgement that it is the largest town centre in the borough and is a designated Metropolitan Town Centre, offering a range of retail, leisure, cultural, office and residential provision.	
	<p><u>Section 4 – Principles of Good Design</u></p> <p>We agree with the acknowledgement of the NPPF (2021) and the National Design Guide (2021) in terms of setting out the characteristics of successful places, however we consider there is no specific need to refer to the By Design document (DETR/CABE, 2000) given the age of this document and that CABE are no longer a public body of the Government (having been merged with Design Council, a registered charity).</p>	No change – The DETR/CABE document is considered to be a relevant reference point to inform the guidance in the SPD. Paragraph 4.8 references the document to demonstrate the evolution of the characteristics, which are largely unchanged in extant national policy and guidance.
	DG1 – No specific comments.	No change – comment noted.
	DG2 – Remove ‘decisively’ from DG2 as it is not reflective of the wording set out in the NPPF or Planning (Listed Buildings and Conservation Areas) Act 1990.	Change – the Council acknowledges that the wording of DG2 needs some clarification in line with the NPPF. The wording has been amended in response to these comments (and comments from Historic England and others).
	<p>DG2 - We request Criteria E is amended as follows (new wording underlined) to ensure the most appropriate form of development can be delivered taking into account and balancing all relevant policies and material considerations.</p> <p>e: Ensure that interventions involving listed buildings/structures/landscapes do not prejudice, <u>where possible</u>, alternative solutions in the future by adopting a flexible, adaptable, reversible and sustainable architectural approach.</p>	Change - DG2(e) uses a widely recognised sustainable (architectural) approach to reusing/repurposing buildings, including buildings that might be/are considered to be a heritage asset. A minor amendment has been made to require ‘where feasible’, recognising that there might be circumstances where this approach is not possible.
	<p>DG3 - We request Criteria A is amended as follows (amended wording underlined) to ensure the most appropriate form of development can be delivered taking into account and balancing all relevant policies and material considerations, including the need to optimise the development potential of sites which may result in a change to the existing urban grain.</p> <p>DG3.a: Be consistent with <u>and</u> appropriate to, the existing urban grain. Existing fine grain and narrow plot widths should be respected and maintained wherever possible.</p>	No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.
	DG4: Tall Buildings, DG5: Materials and Detailing, DG6: Housing Design, DG7: Mixed-use development, DG8: Non-residential development, DG9: Shopfront Design, DG10: Public Realm, and DG11: Movement and Legibility – no specific comments	No change – comment noted.
	<p>DG12 - We request Criteria B is amended as follows (amended wording underlined) to provide clarity on the standards to be applied with respect to inclusive access.</p> <p>DG12.b: Using best practice <u>relevant Local Plan and London Plan</u> standards and design guidance to inform inclusive design principles</p>	No change - Section 2 sets out the relevant policy framework. The reference to best practice is a general reference to cover standards/guidance that might be relevant (on a case by case basis) for certain aspects of inclusive design.
	<p>DG13 – We request Criteria A is amended as in its current form it is seeking to introduce new policy requirement for the delivery of open space which is not reflected in the development plan for LBB.</p> <p>Neither the London Plan nor LBB’s Local Plan sets a prescriptive numerical requirement for new open green space to be delivered by schemes. London Plan Policy G4 states “development proposals should where possible create areas of publicly accessible open space, particularly in areas of deficiency” (our emphasis). Local Plan Policy 59 states “the Council will seek, where opportunities arise and finance permits, to secure improvements in the amount and distribution of, and access to, open space in areas of deficiency identified by the Council” (our emphasis). The wording of these policies is clearly expressed as an aspiration/target and not an explicit requirement for new open green space.</p>	Change - Development Plan policy is clear about requirements for new open green space, but the Council recognises that criterion A does suggest going beyond policy requirements. The SPD has been amended to clarify that new open green space should <u>seek to</u> exceed the minimum spatial and qualitative requirements.

Respondent	Consultation response	How has response been addressed?
	<p>Para 1.13. of the Draft SPD is clear that the SPD provides guidance on the interpretation of adopted planning policies as they relate to various aspects of design; it does not set out new planning policy, as this cannot be done in an SPD. There is no policy requirement for delivery of new open green space, and no spatial and qualitative requirements specified by policy, and therefore the Draft SPD should not seek delivery of such spaces.</p> <p>We therefore request Criteria A is amended as follows (amended wording underlined).</p> <p>DG13.a: ...where development is in an area already identified as having limited access to open green space, explore the possibility of providing the provision for any new open green space should exceed the minimum spatial and qualitative requirements.</p>	
	<p>DG14 – The supporting text refers to public use/activities and communal (not public) use/activities, however the guidance wording does not offer a definition of ‘communal amenity’ and whether this must include public access. There is no policy requirement for all schemes to deliver public spaces/uses or secure public access. We therefore request the guidance is amended as follows to reflect this (amended wording underlined):</p> <p>DG14: All development proposals should contribute towards improving community amenity (<u>communal, public, or both</u>) by...</p>	No change – the existing wording is considered appropriate to cover all requirements.
	DG15: Healthy Homes, DG16: Healthy Streets, and DG17: Sustainable Design - no specific comments.	No change – comment noted.
Local Group	Generally supportive highlighting one specific issue about bird nest sites - no reference to the use of swift bricks in new development.	Change – The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance
GLA	GLA welcome the Urban Design SPD. They feel it could be strengthened further with further amendments. The draft Urban Design Guide could make specific reference to aspects of the London Plan which specifically reference Bromley. These include the Bromley Opportunity Area, and the Bakerloo Line Extension Growth Corridor.	Change - a reference to the opportunity area has been added but reference to Bakerloo line is not considered appropriate.
	Revise the map in on P12 of the document (Figure 2). This is key to understanding the arrangement of the 21 places in the borough but is not legible.	Change - an updated places map has been included.
	The characteristics of successful places on P26 is a long list from multiple sources with a lot of repetition of themes, albeit differently worded. A more succinct list could be considered.	No change – the current wording is considered appropriate.
	The current wording of section 4.17 ‘assessing good design’ implies that the 6 design principles have already been described; however, they are further on in the doc. Consider re-ordering, so this section (4.17) is after the Design Principles section i.e. after 4.48.	No change – the document layout is considered appropriate.
	Pg 6, para 2.15, point 3 – Should this include the word ‘inclusive’ too?	No change - Paragraph 2.15 reflects the Local Plan objectives. The importance of inclusive design is evident throughout the SPD.
	Pg 7, para 2.17 ‘Policy 48’ text should be a new paragraph	No change – a new paragraph is not necessary.
	Pg 11, para 3.25 ‘The 21 borough places originate...’ would read better as ‘There are 21 borough places which originate...’	Change – the wording has been amended to better explain the role of the 21 ‘places’.
	Pg 42, fig 11 Unclear of meaning of reference to ‘vertical streets’ in description	Change – an amendment has been made to provide clarity.
	Pg 52 LP policy D12 relevant also	Change – a reference to the policy has been added to DG12.

Respondent	Consultation response	How has response been addressed?
	Pg 64 'Openings' section: although overheating risk is mentioned, photographic examples indicating mitigation measures (such as decorative grilles, louvres, adjustable solar shading etc) alongside the glazed openings are not currently included in the photographic examples. These would be helpful.	No change – while the Council acknowledges the point being made, there are many factors that contribute to a building/room overheating and it is not necessary to include visual representation of every example.
	Pg 72 LP policy GG4 not relevant	Change - amendment made to remove reference to GG4.
	Pg 75, fig 39 Photographic example appears to show a gated development; LP policy D6 advocates social inclusion and discourages gated development unless unavoidable. A different example photo would be preferable.	No change – The image was chosen to represent a particular housing typology (terraces). The development is not a gated development; the gates enclose a private courtyard framed by a perimeter block of houses and flats fronting the street.
	Pg 77, fig 42 The large green roofed single story structure in the foreground of the example photo is not described at all. Is this home working space at the end of the gardens? Or residential accommodation?	Change – an amendment has been made to clarify that the structures are garden rooms.
	Pg 78 LP policy GG4 is relevant	Change - a reference to GG4 has been added to the relevant policy section of DG6.
	Pg 81, fig 45 The image chosen does not depict a strong sense of place and identity, or show how the different uses manifest and integrate on the site. Is there a different image of the development that might show these better?	Change – It is difficult for one single image to depict every aspect of good design. The image/example is used to raise awareness/draw the user's attention to Flimwell Park, which is considered to be a good precedent to inform the design of mixed-use developments.
	Pg 83 LP policies E5, E8 and E9 relevant too	Change – references to policies E8 and E9 have been added to the relevant policy section of DG7. E5 is not considered appropriate in this section, but is referenced in DG8.
	Pg 87, fig 47 "Re: Green walls: Please add a reference/foot note re: fire safety, and the need to for a development's fire strategy to ensure that facade treatments do not increase risk"	Change - a reference to London Plan policy D12 on Fire safety has been included in the relevant policy section of DG5.
	Pg 89 LP policies E8 and E9 relevant too	Change – a reference to policies E8 and E9 has been added to DG8.
	Pg 116 LP policies G1, G5, G6 and G7 are relevant too	Change – a reference to these policies has been added to DG10.
	Pg 122, para 5.196 It would be good to emphasize that streets are part of public realm by including examples of play on the way and also green and blue infrastructure in this section too. (it is noted that examples are given in other sections)	No change – the Council acknowledges the importance of these aspects of public realm, but notes that this section is called "Streets as Places". There are references elsewhere in the SPD to these aspects, e.g. DG11 recognises the dual purpose of streets.
	Pg 125 LP policy G1 relevant	Change – a reference to policy G1 has been added to DG11.
	Pg 133 LP policy G9 relevant	Change – a reference to policy G9 has been added to DG13.
	Pg 135 LP policy G7 relevant	Change – a reference to policy G7 has been added to DG14.
	Pg 138 LP policies SI 1, SI 2, SI 4 and SI 6 are relevant	Change – a reference to these policies has been added to DG15.
	Pg 148, para 5.261 and fig 94 "Re: Green walls: Please add a reference/foot note re: fire safety, and the need to for a development's fire strategy to ensure that facade treatments do not increase risk"	Change - a reference to London Plan policy D12 on Fire safety has been included in the relevant policy section of DG5.
London Parks and Gardens	<p>DG1 - While the Trust welcomes the requirement that development proposals should respect the setting and character of the environs (DG1c); we suggest that more precise language be used to reduce the risk of misinterpretation. The following wording is suggested:</p> <p>c) Preserving and enhancing the positive aspects of Bromley's unique character by referencing and taking cues from the surrounding context to inform an appropriate architectural language which is sympathetic and</p>	No change – the criterion is considered sufficiently clear.

Respondent	Consultation response	How has response been addressed?
	<p>responsive to the existing or emerging context setting. The introduction of new building forms may be appropriate in areas which have an inconsistent character or limited qualities in order to create a more positive identity where this may enhance or improve the coherence of a character area.</p>	
	<p>Paragraph 5.9 - We welcome the statement in paragraph 5.9 that ‘understanding and responding to the historic environment is key to creating successful and sustainable places.’ However, we would recommend that the following sentence be removed:</p> <p>‘Achieving the right balance between conservation and development requires careful management in order to enable rather than preclude opportunities for positive change.’</p> <p>The correct approach to balancing conservation and development is set out clearly in the NPPF, Chapter 16, where it is discussed in the specific context of ‘proportionality’ and ‘public benefit’. It is our opinion that this section of the SPD should be concerned only with how developments should conserve and enhance the historic environment. However, if balance between conservation and development is to be addressed in this section, we would recommend that readers be signposted to the existing policies where the established approach is set out in detail.</p>	<p>Change – a minor amendment has been made to remove reference to ‘rather than preclude’ to avoid misinterpretation. Relevant NPPF policies are signposted in DG2.</p>
	<p>Paragraph 5.10 - We welcome the reference to conservation areas, statutorily and locally listed buildings in paragraph 5.10. We would recommend this paragraph be expanded to include the historic open spaces. Alongside several Registered Parks and Gardens, the LPG Inventory provides a list of other historic open spaces which could be referenced here.</p>	<p>Change - Reference to Registered Parks and Gardens has been added to paragraph 5.10.</p>
	<p>Paragraph 5.11 – LPG welcomes the statement in paragraph 5.11 that ‘applicants should provide a detailed Heritage Statement describing the significance of any heritage assets impacted by development proposals, including the contribution made to their setting. The level of detail should be proportionate to the assets’ importance for an informed assessment to be made.’ In accordance with paragraph 195 of the NPPF we would suggest that this paragraph also include the requirement for applicants to ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise.’</p>	<p>Change - This requirement is set out in DG2. Further details on heritage statement requirements are set out in the Council’s validation requirements, referenced in section 2.</p>
	<p>DG2 - The wording of the introduction to this policy risks mis-construing the NPPF guidance on justifying harm and loss to heritage assets. ‘All development proposals should seek to preserve and enhance existing heritage assets unless it can be demonstrated that the wider public benefits decisively outweigh any harm or loss.’</p> <p>We recommend this be re-worded as follows: ‘All development proposals should seek to preserve and enhance existing heritage assets. Harm or loss may only be justified where detrimental impacts are outweighed by wider public benefits, in accordance with paragraphs 199 – 202 of the National Planning Policy Framework.’</p>	<p>Change – the Council acknowledges that the wording of DG2 needs some clarification in line with the NPPF. The wording has been amended in response to these comments (and comments from Historic England and others).</p>
	<p>DG2 – We recommend that point a), which requires proposals to ‘demonstrate an understanding of the significance of heritage assets [...] including their evidential, historical, aesthetic and communal value’, signpost the reader to English Heritage’s Conservation Principles, Policies and Guidance, where further information on assessing significance is given.</p>	<p>Change - General reference to Historic England advice and guidance notes has been added to section 2.</p>
	<p>DG4 – Overall LPG welcomes the discussion of taller buildings in paragraphs 5.24 to 5.34. We note however that within Policy DG4 there is no specific reference to the impact of tall buildings on the settings of heritage assets and open spaces more generally. We recommend that point a) be expanded to read</p> <p>[All development proposals should] consider the visual, functional, environmental, and cumulative impact on both the immediate setting and the wider surrounding context in accordance with Policy D9 of the London Plan (March 2021). <i>Proposals should take account of, and avoid harm to, the setting of heritage assets</i></p>	<p>Change – the Council agrees that these points are important considerations but notes that they are already covered under criterion a: visual, functional and environmental considerations (as required by London Plan policy D9)</p>

Respondent	Consultation response	How has response been addressed?
	<p><i>including registered parks and gardens and other noted historic landscapes as defined by your Open Green Spaces policy.</i></p> <p>Paragraph 5.219 - LPG welcomes the inclusion of paragraphs 5.218 - 5.220 on Open Green Spaces, particularly the reference to the range of spaces including leisure gardens and allotments, sports facilities, playgrounds, cemeteries, churchyards and woodland as well as formal parks. We recommend that a reference to the LPG inventory is included here to give further information on the public space currently available in the borough.</p> <p>We recommend however that paragraph 5.219 is amended to state that 'the borough also contains areas where the provision of and access to open green space falls below acceptable levels'. The current wording, which says that provision of access in areas of deficiency 'could be improved' does not accord with the urgency afforded to Open Space Deficiency in the London Plan, policy G4.</p>	<p>Change – the Council welcomes the LPG inventory appended to the consultation response but considers that reference to LPG inventory is not necessary within the SPD. Various Development Plan policies will apply relating to open spaces on this inventory.</p> <p>The wording re: open space deficiency is consistent with wording of Local Plan policy 59, therefore n amendment is not considered necessary.</p>
Planning consultancy	<p>Respondent is broadly supportive of the guidance contained within the Council's Draft Urban Design SPD. However, in the context of the Council's poor housing land supply any guidance provided to support the Council's planning policies should ensure that it does not limit the opportunities for sites in sustainable locations to deliver an enhanced built form that offers a suitable range of uses, including the delivery of new homes.</p> <p>The following wording should be added to DG1: "Proposals which introduce additional height and massing and which contribute positively to the Borough's housing stock should be supported where good design is used and where new buildings are demonstrated to be acceptable in planning terms."</p> <p>We support the principles of DG3, however, we would suggest that additional text should be included as follows: "Buildings promoting additional height (versus existing height), whether through extension or redevelopment, will be considered acceptable where an assessment has been conducted and it has been demonstrated that they can facilitate the creation of a coherent pattern of development, and demonstrate sustainable development in accordance with NPPF."</p> <p>Given the context of the Council's housing land supply which at the time of writing is well below the 5 year requirement, the Council should encourage well-designed tall buildings that are sustainable, and which can assist the Council in meeting housing demand. Specifically, the Council should encourage the development of tall buildings on sustainable brownfield sites, with good public transportation links, as is the case with Elmfield Road. In this context, it is suggested that the following wording is included within the SPD to encourage the development of tall buildings where appropriate: "Re-development of brownfield sites within the town centre which include tall buildings will be supported where sustainable intensification of use can be demonstrated to help meet unmet housing supply within the Borough."</p> <p>Whilst it is acknowledged that Elmfield Road is located within a Business Improvement Area, as noted above, the SPD should actively encourage development proposals that offer the provision of residential dwellings to meet unmet supply, where they demonstrate that there is no net loss of business floorspace. On this basis, we propose the following text is added to DG7: "Mixed-use development, which includes residential uses, should be supported where the uses proposed are compatible with one another, well designed and where they contribute positively to the Borough's housing stock."</p>	<p>No change - The SPD is a positive document which sets out design guidance applicable to planning applications in the borough. The Council considers that the SPD will not unduly restrict development, or add unnecessarily to the financial burdens on development, as the SPD adds further guidance to existing policy.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p> <p>No change – The UDG sets out aspirations and design requirements which will lead to a higher standard of design and build quality in Bromley. Its purpose is not to set out strategic land use(s) and/or set out when or how to apply balance in the decision-making process. The existing wording is considered appropriate.</p>
Bromley Liberal Democrats	<p>Respondent recognises the Urban Design Supplementary Planning Document as a key component in the execution of the Bromley Local Plan and acknowledges the significant amount of work and detailed research which has been undertaken in order to produce such a comprehensive guidance to the application of good urban design within Bromley and its relevance to complementary national/regional/local policy guidance.</p> <p>Respondent would like it made clear in the document that any new developments must mirror or extend the design and style that already exists rather than trying to create a separate identity in an individual development. We feel that the current look in Bromley Town, particularly near Bromley South, is an example</p>	<p>No change – comments noted. The Council agrees that local identity is an important consideration. The SPD already sets out detailed design guidance which, inter alia, sets out the importance of local identity.</p>

Respondent	Consultation response	How has response been addressed?
	of a lack of cohesiveness of design, with the supposedly iconic St Marks Square failing to form part or become part of Bromley's identity. The same can be said of Perigon Heights – two very high buildings that do not reflect any part of the existing character of this part of the town and fail even to complement each other.	
	<p>The assessment of development proposals against the three broad principles of connection, contribution and clarity will, we feel, provide architects and design with a good starting point to inform their design process. We particularly support the 'people first' approach as set out in item 4.18</p> <p>Section could be strengthened to underline that designs must be focussed on the needs and wishes of people who live and work in Bromley. Accessibility of all amenities should be a fundamental basis for all designs.</p>	No change – the reference to a 'people-first' approach is considered sufficient to address the point raised.
	Comments on the six overarching principles. Agree with context and inclusive. Agree with responsive but consider that 'experience' should be sympathetic to existing local vernacular as stated in para 4.29. Agree with connected but would like to see a stronger commitment to giving priority to pedestrians. Agree with healthy, support the practice of Health Impact Assessments being undertaken as early as possible in the design process in order to maximise potential health gains and to address health inequalities. Agree with sustainable, particularly the integration of green infrastructure into the design of commercial and public realm	No change - Support for several principles is noted. The suggested reference to 'experience' being sympathetic to local vernacular is not considered appropriate, as experience is not just informed by aesthetics, it is a broader consideration. Guidance throughout the SPD promotes pedestrian movement as well as other forms of sustainable transport.
	DG2 - Should be a stronger defence of Bromley's heritage in these paragraphs, including a compulsory consultation with heritage organisations, e.g. English Heritage, Bromley Civic Society and other organisations with a guardianship role or interest in these assets.	Change – the Council supports early engagement with relevant heritage organisations, but the SPD cannot mandate consultation. Reference to Historic England advice and guidance notes has been added to section 2.
	There should be a restatement in this section that tall buildings must mirror or extend the design and style that already exists rather than try to create yet another idiosyncratic look. There should be an acknowledgement that the height of these buildings should be lower than certain iconic buildings already in place, e.g. 2 or 3 storeys lower than the Churchill Theatre in Bromley Town, 2 or 3 storeys lower than Bromley College in Orpington.	No change – the suggested amendments are considered too prescriptive for a general design guide, and would constitute new policy in any event. The guidance on tall buildings would ensure that a variety of important considerations are taken into account when assessing tall building applications.
	We would also like to see mention of loss of light and loss of privacy to nearby residential units when high buildings are designed, particularly in relation to balconies.	No change – the Council agrees that these issues are important considerations, and notes that these points are already covered in DG4, through reference to London Plan policy D9. Guidance on balconies is also provided elsewhere in the SPD.
	Materials and Detailing – there should be specific mention of the need to prove the effect of ageing and weathering of materials used (the example of the poor ageing of the metal façade on St Marks Square is relevant here)	No change - the Council agrees that consideration of potential weathering is important, and notes that The SPD already includes sufficient reference to weathering, in the materials section, including in DG5.
	Inclusive Design – as stated we'd like accessibility to be a key part of any design. DG12 covers many important aspects but we'd like specific reference to provision of public toilets (a limiting factor to both young and old when considering accessibility) and weatherproof areas of the public realm.	No change - The London Plan includes policy re: provision of public toilets, it is not necessary to repeat this. The SPD guidance on public realm includes references to shade and shelter.
	Open Green Spaces – Support the need for all proposals to contribute towards improving access to green spaces for all. But would like to see specific reference to areas that can be used for sporting activities.	No change – the Council agrees that open spaces should be multi-functional where appropriate. The SPD already references the need to consider different activities as part of open space design, including sports uses.
	<p>Healthy Streets – we support the requirement for all developments to help create healthy streets and spaces.</p> <p>We would like to see an emphasis on "pedestrian first". We support the need for identifying pedestrian/cycle paths but would like to see an ambition for a completely joined-up approach to cycleways, where new cycleways form part of a borough wide network of cycleways that identifies priority routes to schools, community centres transport hubs and shopping centres.</p>	No change – the SPD supports sustainable transport but does not identify specific schemes; this is not within the remit of the document.

Respondent	Consultation response	How has response been addressed?
	Sustainable Design – We would like to see an emphasis on the retention, refurbishment and reuse of older buildings, especially where they form part of the historic identity of the town. There needs to be overwhelming reasons for demolishing a building and building new – the arguments in favour of refurbishing buildings need to be addressed.	Change – the SPD has been amended to include further reference to circular economy. Existing wording already reflects importance of heritage assets and local identity.
Local group	Respondent acknowledges that much of the guide is positive, but they are concerned that the images/examples of buildings used in the SPD are brutalist and ugly, and would be "totally out of keeping" [in Bromley].	No change - The images used in the document are considered appropriate. They illustrate the principle/s highlighted in the guidance notes and supporting text. They are award winning schemes and widely recognised as good examples of high-quality design.
Individual	In Assessing 'good design' (and the overarching principles), 4.17. I would like to see the removal of 'Emerging', as this will allow justification of any cheap concrete & glass block, as it is paving the way for a new local and emerging context, namely itself.	No change - Emerging is a relevant term and does not mean that any new building will automatically be the key reference point for further development. The guidance in the SPD will help to ensure that new development is appropriate for its context.
	In 4.27 it says, "Historically the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions." I would like this removed, as it is simply not true. The chair of the Civic Society has a quote from an eminent town planner, that the existing "juxtaposition" of the Brutalist buildings on the high street is the worst example of blighting a High Street in the country. Including this would justify dreadful new buildings like the Owen Luder TopShop/Burtons building. Instead, it should include the principle that new developments on or close to the High Street should be 'Human Scaled', so that design elements such as cupolas and domes should be reused from heritage buildings.	No change - Paragraph 4.27 should be read in the context of the SPD's six core design principles and should not be read in isolation. The Responsive and Contextual principles encourage new buildings and spaces to be sympathetic in scale and character. Human scale is referenced in DG3.
	Suggested we include a new core design principle to ensure, where development is in (or close to) a conservation area, the local design elements are incorporated into the building design. This is to make new developments identifiably 'Bromley' (or whichever neighbourhood it is) rather than a building that could be anywhere in the UK. And 'seeking reference' is NOT good enough; have seen enough architect's drawings to know that incorporating these heritage design elements is done with great reluctance.	No change – the Council recognises the importance of preserving and enhancing heritage assets and protecting local identity, e.g. in the Contextual and Responsive principles and guidance notes DG1, DG2, DG3, DG5, DG6 and DG9. which is reflected in the specific guidance note DG2. However, a separate overarching principle would be unsuitable and unnecessary; the document needs to be read as a whole not in isolation.
	The illustrations deserve very careful curation: the choice of these will have a considerable input into what architects think will be acceptable. The current ones seem to be chopped out of some architectural journal. They ignore good local examples and incorporate no heritage design elements at all. As architects in the town centre, have proved very reluctant to use heritage design elements, they definitely need to be in the examples. In short, as residents, we 'don't want to look at buildings like these for the next 50 years. Respondent provides comments on good illustrations and several illustrations that should be replaced as they are either too tall, ignore good local examples, are bad examples of human scale or ignore local heritage and go cheap.	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The precedent images are not advocating the exact scheme being developed in Bromley, nor do they suggest such schemes would get permission if proposed. The SPD sets out extensive design guidance that applies as a whole to new development. Respondent put forward several local examples for precedent images, but they were considered inappropriate, were not the requisite quality and did not represent the principles that the precedent image was intended to convey.
Local group	Good to see 'biodiversity' and 'ecosystem services' mentioned in the draft Bromley Urban Design Guide SPD but they merit greater emphasis in this document.	Change - A new sub-section on biodiversity has been added to the 'Sustainable' principle section, to address these and other comments relating to biodiversity.
	Charles Darwin lived in Downe for 40 years from 1842 until his death in 1882. He studied, observed and experimented on local plants and animals. These studies were incorporated into his books and articles including 'On the Origin of Species by Means of Natural Selection' (1859). The areas where he studied still remain much as he described them and continue to support many of the species he studied here. They are	No change – These points are not considered relevant to the character appraisal or elsewhere in the SPD.

Respondent	Consultation response	How has response been addressed?
	therefore of great local, national and international importance educationally for visitors from local young children to international scientists. Cudham and Downe Valleys, Keston Common and Holwood need protection from development which would detract from the Darwin story and need to be incorporated into Section 3 Character Appraisal, possibly under the section Darwin & Green Belt Settlements (3.71-3.73) and referred to within Policy DG1	
	Reflective materials should be avoided in building design. This should be added to paragraph 5.56 which states, 'The choice of materials should also be influenced by the wider environmental impacts'	No change – the Council agrees that reflective material needs to be considered carefully. The SPD already includes reference to reflective material; additional reference is considered unnecessary.
	Consideration should be given to the installation of integrated bird and bat boxes in appropriate areas	Change – Support for the SPD is noted. The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance, including a new guidance note to summarise the section.
	Under Nature 5.170 Line 6, add, 'reduction of pollution'	No change – while reduction of air pollution is an important issue, it is already addressed elsewhere in the SPD.
	Policy DG8 point e, add reference to biodiversity	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	Under Non residential building paragraph 5.115 include mixed native species hedgerow planting. For example, lines 1 & 2 ' including tree and mixed native species hedge planting to screen plant facilities and service yards, and reduce the need for unsightly security fencing.'	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG10 – Suggest adding 'and create Nature Recovery Networks bringing the countryside into the town' so it reads, 'Incorporate green infrastructure (trees, planting, SUDs) to help mitigate environmental conditions and create Nature Recovery Networks bringing the countryside into the town. Consider microclimate effects (influenced by layout, orientation, and scale of buildings) in order to create a comfortable environment which encourages rather than deters use of the space(s)'	No change – the SPD already includes reference to NRN; further amendment is considered unnecessary.
	DG11 Add in the importance of including native species for 'Nature Recovery Networks' and increasing ecosystem services. Bringing the countryside into the town.	No change – the SPD already includes reference to NRN; further amendment is considered unnecessary.
	Under 'Healthy' paragraph 5.220 point 1. Boundaries should be mixed native species hedging wherever possible as these support biodiversity.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG13: Open Green Space. Emphasise importance of native species as these support biodiversity Nature Recovery Networks and bringing the countryside into the town (mental health).	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
	DG14: Community Amenity. Emphasise importance of using native species as these support biodiversity and Nature Recovery Networks.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.

Respondent	Consultation response	How has response been addressed?
	DG16: Healthy Streets need trees and shrubs to reduce air pollution and for urban cooling. These should include many native species to support biodiversity too. Healthy Streets can also bring countryside into town, good for mental health.	Change – the Council acknowledge the importance of biodiversity. The specific amendment is not considered necessary but a new sub-section on biodiversity has been added to the Landscape Design section and the 'Sustainable' principle section.
Local group	Respondent welcomes the aims set out in the SPD and make several suggested changes/rewordings to improve/strengthen those aims. The longevity and purpose of the document in a changing policy environment is questioned. A number of comments support various aspects of the document but question whether it can be delivered.	No change – The UDG sets out our aspirations and design requirements and will lead to a higher standard of design and build quality in Bromley.
	What will be the fate of the Urban Design SPD when the Local Plan is replaced?	No change – The role of the SPD is set out in section 1. Upon adoption of the new Local Plan, the SPD will remain a relevant consideration but may require updating to reflect new policies.
	Leafy avenues and a bosky street environment are a key characteristic of suburban Bromley – important in all of the 21 areas	No change – 29h This is reflected in paragraph 3.20.
	Should Local Plan policy 42 (development adjacent to a Conservation Area) be added to 'relevant guidance' under DG1 and DG2?	Change - Reference has been added to DG1 and DG2.
	Should 'can' be omitted from paragraph 5.7? "Heritage assets DO influence an understanding of place and DO make a contribution to our natural and built environment"	No change – the current wording is considered appropriate, and ensures benefits of heritage assets will be taken into account.
	The word "several" should be replaced with 'many' in paragraph 5.10	Change - Amendment made.
	Should reference be made Historic England guidance notes under DG2?	Change - General reference to Historic England advice and guidance notes has been added to section 2.
	Fig 16 p.49 – this diagram needs more explanation. As it stands it meaningless.	No change - The diagram conveys key principles for tall buildings and should be considered in conjunction with other guidance in the SPD, not in isolation.
	The importance of street trees to the distinctive Bromley environment should be recognised.	No change - The SPD guidance sufficiently references the benefits of trees at various points throughout the document.
	General comments on the images and highlight the need for local examples of good design. Group consider it a shame that all the photo examples given are located elsewhere. Are there no good examples of these design principles within the Borough?	No change - The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.
National Highways	NH are satisfied that the SPD would not materially affect the safety, reliability and/or operation of the SRN.	No change – comment noted.
Individual	Please can you add my comments to be looked at before you decided on your new design plan. The designs of any new buildings should fit in with Bromley design already there. Not these urban designs that look out of place, also the designs are way too high. I just read a report by Croydon council, they now want to stop high rise buildings, they have realised they have made a mistake building so many high rise buildings. But I believe its too late for them now. Its not too late for Bromley. 10 storey buildings is enough with these new blocks. Look what happened at Bromley south this year with the fire. Its very hard for the fire brigade to attend and solve quickly, why would you have more of these tower blocks. I wonder who will buy them, I would not want to leave up high.	No change - The SPD provides guidance on tall buildings which relate to the issues raised.

Respondent	Consultation response	How has response been addressed?
Individual	<p>Please state in section 5.170-5.171 (Nature, page 106): "Immature habitats cannot support cavity-nesting birds without artificial nest sites - therefore, to enable access to nature, swift bricks are a universal nest brick for a wide range of small bird species and should be included in accordance with best practice guidance such as that available from CIEEM.</p> <p>Swift bricks have advantages compared to external nest boxes - they last the lifetime of the building, have no maintenance requirements, have good temperature regulation with future climate change in mind, and are aesthetically integrated with the building design." The reason for adding this statement is that immature habitats cannot support nesting birds without artificial nest sites - the upcoming Net Gain for Biodiversity requirement also overlooks cavity-nesting birds which require older buildings or mature trees.</p> <p>Swift bricks meet the needs of nesting birds as they are a universal nest brick for a wide range of small bird species (NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42): https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</p> <p>The Mayor of London's guide to Urban Greening for Biodiversity Net Gain calls for nest bricks but it is easily missed on the final page of the document: https://www.london.gov.uk/programmes-strategies/urban-greening-biodiversity-net-gain-design-guide</p> <p>The London Plan policy G6 (item B4) calls for artificial nest sites appropriate for an urban context [e.g. swift bricks]: https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021</p> <p>There is a British Standard BS 42021:2022 for Integral nest boxes and this calls for such nest boxes to be swift brick type boxes, to enable a wide range of birds to use them (starling type boxes may cause birds to become trapped within): https://standardsdevelopment.bsigroup.com/projects/2017-03102#/section CIEEM provide best-practice guidance online regarding numbers and location: https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</p> <p>Monitoring data from the Duchy of Cornwall shows the benefits of swift bricks to a wide range of bird species: https://nansledan.com/duchy-nest-brick-project-boosts-endangered-wild-birds/</p> <p>National Planning Policy Guidance (NPPG) 2019 Natural Environment paragraph 023 sets out the wildlife benefits of swift bricks, and also bat boxes and hedgehog highways: https://www.gov.uk/guidance/natural-environment</p>	<p>Change - The Council agrees that further guidance on artificial nesting would provide useful clarity. The landscape section has been amended to add further guidance. A new section on biodiversity has also been included, including reference to biodiversity net gain.</p>
Charity	<p>In section 2.9 - 2.13 on London Policy context, we recommend adding reference to the following: Policy G7 of the new London Plan (2021) states that "Development proposals should ensure that, wherever possible, existing trees of value are retained." https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf.</p> <p>The London Plan guidance on the London Urban Greening Factor places the highest value on semi-natural vegetation (including trees) maintained or established on site. https://www.london.gov.uk/sites/default/files/ugf_-_consultation_version_sept_2021.pdf</p> <p>We welcome the recognition in section 3.20 of the importance of woodlands and street trees to Bromley's character. We recommend that a full tree survey is undertaken to update the Ancient Tree Inventory for Bromley in order to enrich the evidence base for the SPD.</p> <p>Welcome the inclusion of green infrastructure and access to greenspace as part of healthy places (para 4.41). Support the principle of sustainable (4.44-4.48).</p> <p>We support the approach that a comprehensive context appraisal should be undertaken before any design work begins, identifying existing natural assets, including ancient, veteran and notable trees.</p>	<p>Change - Section 2 sets out the broad 'Policy Framework', individual policies are referenced in Section 5 'Design Guidance', policy G7 will be added to DG10 under relevant policy and guidance.</p> <p>Change – An additional paragraph referring to the Urban Greening Factor has been added.</p> <p>No change – the Council recognises the importance of trees, but a full tree survey is not necessary to inform this SPD.</p> <p>No change – support noted.</p> <p>No change – support noted.</p>

Respondent	Consultation response	How has response been addressed?
	<p>We welcome the sections on Landscape and Nature (paras 5.162 - 5.171) including guidance on maximising natural features, and Policy DG 10 particularly section e) on incorporating green infrastructure including trees. We recommend underpinning this with specific targets and requirements, such as setting a tree canopy cover target, and/or adopting an Urban Greening Factor approach. We recommend setting a proposed ratio of tree replacement, where trees are unavoidably lost, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience. These policies will support delivery of the emerging national requirements for Biodiversity Net Gain and Local Nature Recovery Strategies.</p>	<p>Change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review. An additional paragraph referring to the Urban Greening Factor has been added, reflecting the adopted policy in the London Plan.</p>
	<p>Welcome the reference to street trees in DG11 para d). Street trees have multi-functional benefits: they add character, connect habitats, absorb CO2, improve climate resilience, reduce pollution effects and enhance physical and mental well-being.</p>	<p>No change – support noted.</p>
	<p>Strongly welcome the guidance in paras 5.219 and 5.220 on addressing deficiency of access to greenspace and on including natural greenspace in this provision. We support the principle that residential developments should have access to the natural environment, including to woodland. We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space: – Of at least two hectares in size, no more than 300m (five minutes' walk) from home. – At least one accessible 20-hectare site within 2km of home. – One accessible 100-hectare site within 5km of home. – One accessible 500-hectare site within 10km of home. – A minimum of one hectare of statutory local nature reserves per 1,000 people. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that: – That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. – That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review. The importance of providing access to nature is highlighted in paragraphs 5.170-5.17, 5.218-5.220 and DG13.</p>
	<p>Strongly welcome the guidance, particularly the sections on Green Infrastructure and Urban Greening. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats. Green infrastructure should be protected, enhanced and integrated into development plans, including through local tree strategies, landscape management plans or urban development briefs. To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations for green infrastructure should include management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly-mown turf and have wider biodiversity benefits.</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review.</p>
	<p>The guidance in the draft SPD is sound. To be effective in practice, it needs to be supported by specific policy requirements and targets, such as a tree canopy cover target, and or urban greening factor metrics. We recommend the Woodland Trust guidance https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/</p>	<p>No change - As stated in paragraph 1.11 the guidance is not intended to be overly prescriptive but aims to outline key design principles. The SPD cannot introduce new policy, the suggested policies and policy standards would need to be considered as part of the Local Plan review.</p>
<p>Local group</p>	<p>Section 1 should refer to Scheduled Ancient Monuments.</p>	<p>Change – the Council agrees that additional references to Scheduled Monuments would be useful. Section 1 introduces the purpose, scope and status of the document, but reference to the Scheduled Monuments consent process has been added to section 2. Specific Scheduled Monuments are also referenced in Section 3 (Character Appraisal).</p>

Respondent	Consultation response	How has response been addressed?
	<p>Paragraph 3.15 mentions that older buildings date back to the 19th and early 20th century, there are a number of listed timber framed buildings by the church which date from the 16th century.</p> <p>Reference should be made to the Roman Baths being a Scheduled Ancient Monument.</p> <p>Paragraph 3.57 should mention that Scadbury Manor is a Scheduled Ancient Monument.</p> <p>Paragraph 3.97: The Priory has elements dating from the 13th century – rather than the 15th century as stated, and the timber framed extension dates from the 16th century – not the 17th century as stated. Reference should be made to the Grade II listed gardens in the grounds of the priory.</p>	<p>Change - The dates and details referenced in paragraphs 3.15, 3.57, and 3.97 have been added to the SPD. General reference to Scheduled Monuments has been added to paragraph 3.27.</p>
	<p>It should be made clear that Heritage Statements should take account of Archaeological Priority Areas and should refer to the guidance on the LBB planning website.</p>	<p>Change - The need for Heritage Statements to take into account Archaeological Priority Areas has been added to paragraph 5.11.</p>
	<p>The word 'identification' should be added before 'retention' in paragraph 5.268.</p>	<p>No change - The wording of paragraph 5.268 is considered to be appropriate within the context of adaptability and resilience.</p>
Individual	<p>The plan to do an Urban Design Guide SPD is great, but this all reads a little like it's just paying lip service to the idea. It doesn't really seem like the author(s) know or care about what makes Bromley a unique or distinctive place. Nor do they demonstrate anything other than a basic understanding of the different areas within Bromley. The Borough Places read a little like they spent 5-minutes researching Bromley via Wikipedia. Far more detail on the character areas is required. Most of the Borough Places are only three to four paragraphs long and very broad-brush. Virtually nothing on architectural or urban characteristics. Nothing on access and movement, Virtually nothing on the history of each area. Nothing on social or economic information, or the experience of living in each area. Why are none of the examples from Bromley?</p>	<p>No change – the Council considers that the SPD provides sufficient detail to convey the varied characteristics of Bromley, relevant to the purpose of the document.</p> <p>The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.</p>
Individual	<p>Large scale new development must not segregate private housing from social/affordable. all residents must be able to use all facilities/amenities. all new development must re-use rain water and have solar/photovoltaic panels.</p>	<p>No change – The SPD promotes tenure blind principles and includes guidance on sustainable design.</p>
Individual	<p>Section 1 – Should the vision state as fact “The Green Belt fulfils its purpose” There is a lack of evidence to support this statement. You fall silent on how the Green Belt could be further scrutinized, boundaries reviewed, and opportunities created.</p>	<p>No change - This repeats the vision from the Local Plan. A review of green belt is outside the remit of an SPD.</p>
	<p>Section 2 - Not with standing the incredible length of time to determine applications in Bromley, the list of validation requirements is substantial and can be viewed as a barrier to encouraging development.</p>	<p>No change – comment noted. These issues are outside the remit of the SPD.</p>
	<p>Section 3 - Too many examples shown appear to be computer generated rather than real world. The document is lacking evidence of positive outcomes in Bromley Borough.</p>	<p>No change - It is assumed that the respondent is referring to the precedent photos in section 5. If so, none of them are CGI.</p> <p>The images used in the document are intended to illustrate the principle/s highlighted within the guidance notes and the supporting text. They are generally award-winning schemes and widely recognised as good examples of high-quality design. The Council had intended to use Bromley-based schemes but there were no schemes of a sufficient quality that were considered to be appropriate for use as precedent images.</p> <p>Respondent has not suggested any examples so it is difficult to know what is considered to be a positive outcome.</p>

Respondent	Consultation response	How has response been addressed?
	Section 4 - Good design can be subjective, this document gives no clear guidance to a preferred route in Bromley. Members have historically rejected modern design as being ugly! Planners might support new ideas, but then committees rarely follow officer recommendations on such proposals.	No change - the SPD provides a positive framework to achieve high quality design in the borough.
	Contextual - "Bromley has a strong architectural and cultural heritage with a distinctive character" Please describe distinctive, and explain how the average person would quantify this. Is mish mash is distinctive? Please don't pretend that it is anything more!	No change – Distinctiveness is a well understood terms in the context of planning and design, and is considered appropriate terminology here.
	Responsive – Too many examples of cheaply built, flat fronted plain brick structures claiming to be characterful. Far better examples can be found in other parts of the country.	No change - The images used in the document are considered appropriate. They illustrate the principle/s highlighted in the guidance notes and supporting text. They are award winning schemes and widely recognised as good examples of high-quality design. No specific alternate suggestions were put forward for consideration.
	Connected - "Connected Street Networks" Bromley is mainly a car driver's borough, cul-de-sacs prevent rat runs and speeding, presumably improving road safety and reducing fatalities, and this is why most modern development are built as such.	No change – comment noted.
	Inclusive - Sounds like an ideal utopia, but will it work in practice! Siting successful examples in the borough might help, but none spring to mind.	No change – comment noted.
	Healthy - If you want healthy options, allow the building of houses with gardens where people can exercise and enjoy the outdoors, and option that most people would prefer, not high rise living in tower blocks.	No change - The SPD applies to a wide range of development typologies, including houses with gardens and tall buildings.
	Sustainable - MMC = quick cheap and won't stand the test of time. Many 1970's tower blocks have already been torn down, new homes should be built to last 100 years plus.	No change – the SPD clearly sets out that MMC will be subject to the same level of design scrutiny and quality benchmarks as conventional builds.
	Other comments - I expect this to be railroaded through whilst the real issue of a lack of building over many decades and hundred on the council homelessness list grows and grows whilst lip service is paid these ever more frequent documents that have systematically failed to deliver the right homes in the right places over very many years.	No change – comment noted.



Urban Design Guide Supplementary Planning Document

Strategic Environmental Assessment Screening
Statement – September 2022 (with post-
consultation update June 2023)

1. Purpose of Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

- 1.1. This Strategic Environmental Assessment (SEA) screening is being prepared in accordance with the requirements of European Directive 2001/42/EC (“the Directive”); and the Environmental Assessment of Plans and Programmes Regulations 2004 (“the Regulations”). The following guidance has also been taken into account:
- The National Planning Policy Framework (NPPF) (July 2021)¹.
 - The National Planning Practice Guidance (PPG) in relation to SEA/SA².
 - A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)³.
- 1.2. Sustainability Appraisal (SA) is the process by which the Directive is applied to Local Plan documents. An SA is required under the Planning and Compulsory Purchase Act 2004 for all Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Directive also requires a SEA to be carried out on certain types of plans with significant environmental effects.
- 1.3. Both SA and SEA processes are undertaken during the preparation of a plan or strategy to aid the implementation of sustainable development. The main difference between them is that while an SEA has more of an environmental focus, the SA should focus on social, economic and environmental issues.
- 1.4. Although SA and SEA are distinct requirements, government guidance has recommended a single appraisal process. The SA process for planning documents translates the requirements of the Directive, and Government guidance on undertaking SAs has been prepared so as to incorporate the requirements of the SEA Directive.
- 1.5. Bromley’s Development Plan consists of the Bromley Local Plan and the London Plan. The Bromley Local Plan and the London Plan have both been subject to a SA/SEA
- 1.6. The PPG⁴ states that:

“Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.

A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes

¹ Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² Available from: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

³ Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

⁴ Paragraph: 008 Reference ID: 11-008-20140306, available from:

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Regulations 2004), unless it is considered that there are likely to be significant environmental effects.”

2. Urban Design Guide SPD

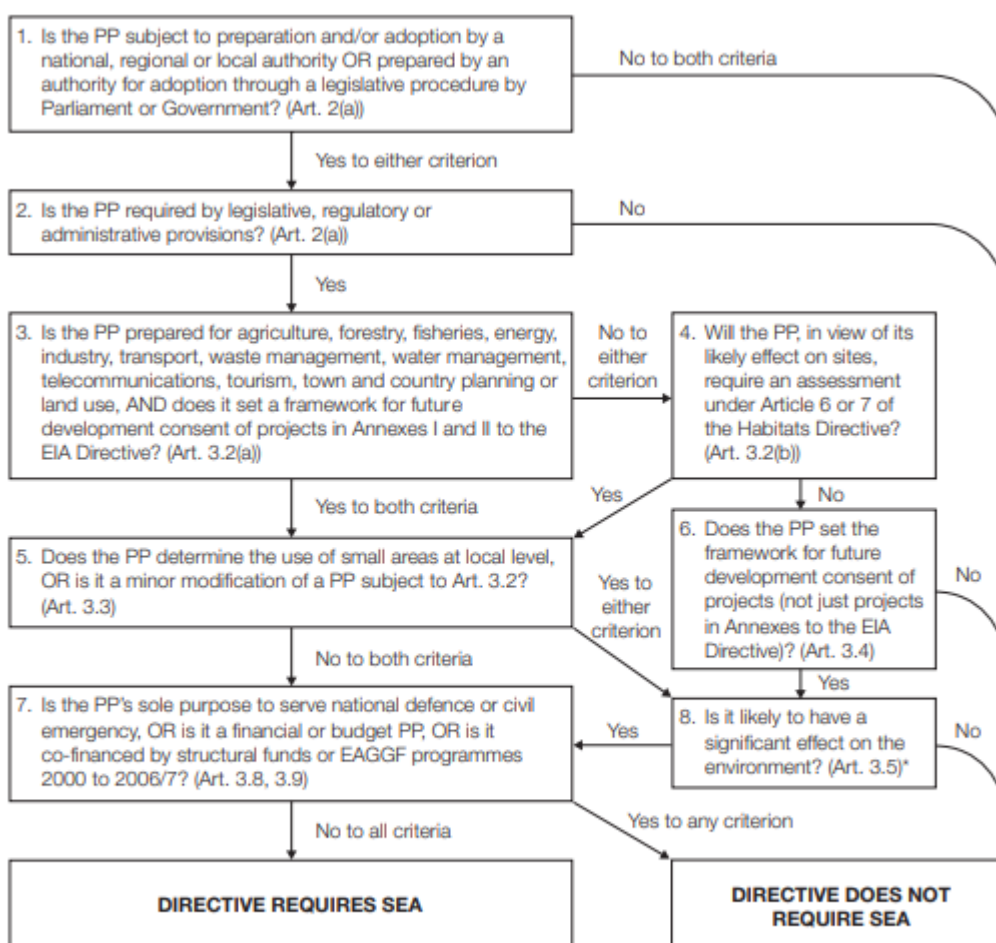
- 2.1. The Urban Design Guide SPD provides guidance on urban design to inform and engage developers, applicants, planning officers, residents and all other interested parties in bringing forward proposals for development in Bromley.
- 2.2. The SPD sets out the following principles for achieving good design with the aim of significantly raising the quality of development within the borough:
 - Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 2.3. Key aspects of local character are highlighted alongside illustrative design guidance to ensure that new development is delivered sensitively and cohesively, achieving a sense of unity without uniformity.
- 2.4. The guidance is not intended to be overly prescriptive but aims to provide an overarching spatial vision outlining key design principles that should be followed, whilst also allowing for flexibility to encourage richness, variety and innovation in future detailed designs.
- 2.5. The aim is to promote good quality design for buildings, landscape, and public realm, establishing the desired characteristics for successful places and providing a quality benchmark for how new development should look and feel.

3. The Screening Process

- 3.1. Though not part of the statutory Development Plan, SPDs can cover a range of issues, which generally interpret policies in the Development Plan. If an SPD is considered unlikely to have significant environmental effects through the screening process, then the conclusion will be that the SEA is not necessary.
- 3.2. To assess whether an SEA is required the Responsible Authority (Bromley Council) must undertake a screening process based on a standard set of criteria. Where the Responsible Authority determines that the plan or programme is unlikely to have significant environmental effects, and therefore does not need to be subject to full SEA, it must prepare a statement showing the reasons for this determination.
- 3.3. This must be subject to consultation with Historic England, the Environment Agency and Natural England. Following consultation, the results of the screening process must be detailed in a Screening Statement, which is required to be made available to the public. The three consultation bodies were consulted during the preparation of this SEA screening statement; details of their responses are provided at Appendix 1. Only Natural England provided a response to the initial screening consultation, which notes agreement with the Council that an SEA would not be required for the proposed SPD.
- 3.4. As of the end of the draft SPD consultation (December 2022), no responses to the SEA screening statement were received from the Environment Agency or Historic England, although both organisations did provide comments on the draft SPD itself.

- 3.5. Key to the screening decision is the determination of whether the SPD is likely to have significant environmental effects. To assess this, the Council has taken a two-step approach:
- First, to assess the plan against the guidance set out in 'A Practical Guide to the Strategic Environmental Assessment Directive'⁵. The guidance sets out a flow chart to guide application of the Directive to plans and programmes (shown in Figure 1); the screening questions from the guidance are set out in Table 1, alongside the Council's response in relation to the Urban Design Guide SPD.
 - Second, using the criteria set out in Schedule 1 of the Regulations to determine whether the SPD will have significant environmental effects. These criteria are set out in Table 2, alongside the Council's response in relation to the Urban Design Guide SPD.

Figure 1: flow chart to assist with the application of the SEA Directive to plans and programmes



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

⁵ Ibid

4. Screening assessment

Table 1: assessment against criteria in A Practical Guide to the Strategic Environmental Assessment Directive

	Screening Question	Screening Assessment
1	Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government?	Yes. The SPD will be prepared and adopted by the London Borough of Bromley in its role as Local Planning Authority.
2	Is the SPD required by legislative, regulatory or administrative provisions?	No. The preparation of a SPD is optional. However, once adopted by the London Borough of Bromley, it will be a material consideration in the determination of planning applications.
3	Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	Yes. The SPD will not create new policy or land use designations, but it will provide further guidance to support the Local Plan and London Plan, which is the town planning policy framework for its area and includes policies for land-use. However, the Local Plan and London Plan has been subject to full SA (including SEA).
4	Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No. The Local Plan and London Plan were subject to screening for the need for assessment under the requirements of the Habitats Directive and it was concluded that such assessment was unnecessary. As the SPD will not change or add to policy, proposals or designations within the Core Strategy it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
5	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No. The SPD will complement the policies that have already been set within the Local Plan and London Plan. No aspects of the SPD will modify existing adopted policies nor seek to change existing site allocations, nor add new ones. The SPD will provide guidance on interpreting a number of Development Plan policies in relation to the design of development.
6	Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)?	No. This framework is already set within the Development Plan. The SPD will provide further guidance on the implementation of these policies.
7	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or	No. The SPD does not fall into any of the criteria listed.

	Screening Question	Screening Assessment
	EAGGF programmes 2000-2006/7?	
8	Is it likely to have a significant effect on the environment?	It is not likely that the SPD will have any significant effect on the borough, beyond those effects that have already been assessed through the SA (including SEA) of the Local Plan and London Plan.

Table 2: assessment against SEA Directive criteria

SEA Directive Criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	London Borough of Bromley Response
1. Characteristics of the Urban Design Guide SPD having particular regard to:	
The degree to which the SPD sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The SPD will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough (and which were both subject to an SA/SEA)
The degree to which the SPD influences other plans and programmes including those in a hierarchy.	The SPD is a non-statutory document, subsidiary to policies in the adopted Local Plan and London Plan, and therefore will have limited (if any) influence over other plans and programmes, including national policy in the NPPF.
The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development.	The SPD provides guidance on various aspects of design, derived from policies in the adopted Development Plan, including open space and green infrastructure, and sustainable design.
Environmental problems relevant to the SPD.	The SPD will provide further design guidance on environmental Development Plan policies.
The relevance of the SPD for the implementation of community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD will not impact on the implementation of community legislation on the environment.
2. Characteristics of the effects and of the area likely to be affected, having particular regard to:	
The probability, duration, frequency and reversibility of the effects.	The overall impact of the SPD will be positive, by ensuring that guidance is in place to improve design outcomes, which addresses several key policy requirements and will help to deliver sustainable development.
The cumulative nature of the effects of the SPD.	Cumulative effects have been assessed through the Local Plan and London Plan SA/SEAs. The SPD is unlikely to have specific cumulative effects which differ from those assessed as part of the Local Plan and London Plan; the effect of the SPD will therefore be neutral.
The trans-boundary nature of the effects of the SPD.	The SPD will only apply to developments in Bromley Borough, and will therefore have limited, if any, transboundary impacts.
The risks to human health or the environment (e.g. due to accidents)	No significant risks to human health are envisaged through the application of this SPD.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) by the SPD.	The likely positive effects of the SPD will potentially extend across the whole Borough, by improving the quality of design.
The value and vulnerability of the area likely to be affected by the SPD	The SPD will be consistent with the Development Plan approach that seeks to conserve and enhance

SEA Directive Criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	London Borough of Bromley Response
<p>due to:</p> <ul style="list-style-type: none"> i. Special natural characteristics or cultural heritage; ii. Exceeded environmental quality standards or limit values; or iii. Intensive land use. 	<p>the borough's heritage assets in a manner appropriate to their significance.</p> <p>The SPD also includes guidance relating to sustainable design and recognises that nature contributes to the quality of a place, and to people's quality of life, and is a critical component of well-designed places.</p> <p>The SPD will not result in a significantly more intensive land use than that expected via application of the adopted Development Plan policies.</p> <p>The overall likely effect of the SPD will be positive by securing the positive environmental effects of development and minimising or avoiding negative impacts.</p>
<p>The effects of the SPD on areas or landscapes which have recognised national, community or international protection status.</p>	<p>The Borough includes part of an Area of Outstanding Natural Beauty and several Sites of Special Scientific Interest. The SPD is unlikely to have specific effects on these areas which differ from those assessed as part of the Local Plan and London Plan; the effect of the SPD will therefore be neutral.</p>

5. Statement of Reasons for Determination

- 5.1. The Council believes that the impact of the SPD, through responses to the Criteria identified in Tables 1 and 2, will not have significant environmental effects (positive or negative) on Bromley, further to the effects that have already been assessed during the preparation of the Local Plan and the London Plan. In addition, the SPD is not setting new policy; it is supplementing and providing further guidance on existing policies. Therefore, it is considered that an SEA will not be required for the Urban Design Guide SPD.

Appendix 1: responses to draft SEA screening statement from Historic England, the Environment Agency and Natural England (covering the initial screening consultation and the draft SPD consultation)

Consultee	Response	LBB comment
Environment Agency	No response	N/A
Historic England	No response	N/A
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Screening Request: Strategic Environmental Assessment It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>Natural England is in agreement that “as this SPD does not formulate new policy and the effects of the SPD are likely minor in nature, an SEA will not be necessary.”</p> <p>We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.</p> <p>We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.</p> <p>Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.</p> <p>Please note that Natural England reserves the right to provide</p>	Noted

Consultee	Response	LBB comment
	further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages.	

Agenda Item 6

Report No.
HPR2023/038

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

FOR PRE-DECISION SCRUTINY AT DEVELOPMENT CONTROL COMMITTEE AND THE RENEWAL, RECREATION AND HOUSING PDS COMMITTEE

Date: DCC: 13 June 2023
RRH PDS: 15 June 2023
Executive: 5 July 2023

Decision Type: Non-Urgent Executive Key

Title: ADOPTION OF THE ORPINGTON TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT

Contact Officer: Ben Johnson, Head of Planning Policy and Strategy
E-mail: ben.johnson@bromley.gov.uk

Chief Officer: Tim Horsman, Assistant Director (Planning)

Ward: Orpington; Farnborough and Crofton; Petts Wood & Knoll

1. Reason for report

- 1.1. This report recommends the adoption of the Orpington Town Centre Supplementary Planning Document (SPD). The SPD provides guidance to assist with the determination of planning applications in the Orpington Town Centre area, including guidance on design requirements.
 - 1.2. A draft SPD underwent public consultation from 9 March 2022 to 1 July 2022. A significant number of responses were received covering a number of issues. The final SPD includes a number of amendments in response to comments received.
-

2. RECOMMENDATION(S)

For Development Control Committee and Renewal, Recreation and Housing PDS Committee:

- 2.1 That members note the Orpington Town Centre Supplementary Planning Document (shown at Appendix 1) will be presented to Executive for adoption.

For the Executive:

- 2.2 That Executive adopt the Orpington Town Centre Supplementary Planning Document (shown at Appendix 1) as a local development document, subject to any further minor changes (e.g. related to formatting or mapping) prior to adoption.

Impact on Vulnerable Adults and Children

1. Summary of Impact: No Impact
-

Transformation Policy

1. Policy Status: Existing Policy – document provides guidance to assist the implementation of adopted Development Plan policy set out in the Bromley Local Plan and the London Plan.
 2. Making Bromley Even Better Priority (delete as appropriate):
(3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
-

Financial

1. Cost of proposal: Costs associated with publicising the adopted SPD will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2023/24
-

Personnel

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Town and Country Planning (Local Planning) (England) Regulations 2012
 2. Call-in: Applicable: Further Details – Executive Decision
 3. It is necessary to have due regard to the public sector equality duty, which sets out the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations between people who share a protected characteristic and people who do not share it. It is not anticipated that adoption would adversely affect any of those objectives.
-

Procurement

1. Summary of Procurement Implications: N/A
-

Property

1. Summary of Property Implications: N/A
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: the SPD will assist the implementation of Development Plan policies which seek to reduce carbon emissions.
-

Impact on the Local Economy

1. Summary of Local Economy Implications: The Orpington Town Centre SPD supports the implementation of London Plan and Local Plan economic policies.
-

Impact on Health and Wellbeing

1. Summary of Health and Wellbeing Implications: The Orpington Town Centre SPD supports the implementation of London Plan and Local Plan policies relating to health and wellbeing.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: Ward Councillors for Orpington were involved in the preparation of the draft SPD from an early stage. All ward councillors were notified of the consultation on the draft SPD. No comments were received.

3. COMMENTARY

Background

- 3.1 A report to Development Control Committee, Renewal, Recreation and Housing Policy Development and Scrutiny Committee (RRHPDS) and Executive in early 2020 set out the intention to prepare to produce a Supplementary Planning Document (SPD) to guide development in Orpington Town Centre¹. This proposed approach was agreed in April 2020².
- 3.2 A consultation exercise to inform the SPD was conducted between 15 July and 5 October 2020, seeking views on the future of Orpington Town Centre and what SPD should focus on. Details of the feedback received during the consultation, and how this feedback informed the draft SPD, is provided in the consultation statement at Appendix 2.

Consultation on the draft Orpington Town Centre SPD

- 3.3 Executive approved the draft Orpington Town Centre SPD for consultation at their meeting of 9 February 2022³. The Council consulted on the draft SPD from 9 March 2022 to 1 July 2022. The consultation statement (provided at Appendix 2) sets out details of how the consultation was undertaken (section 5); summaries of the responses received (section 6); and details of how the Council has addressed these responses in the final SPD (section 7).

Proposed adoption draft Orpington Town Centre SPD

- 3.4 The guidance in the SPD has been developed by the Council's policy and urban design officers, with consideration of the national, London-wide and local planning framework, including the emerging emphasis on design quality in national policy. The proposed adoption draft SPD at Appendix 1 includes a number of amendments in response to comments received during the public consultation, as well as additional amendments following further internal discussions.
- 3.5 The SPD first sets out relevant background information and a vision for the town centre. An amendment has been made to this section to clarify the role of 'development opportunities' included elsewhere in the SPD.
- 3.6 It then sets out the relevant local, London-wide and national policy framework which underpins the guidance and describes the context of the area with reference to townscape, topography and other important considerations. Additional policy and guidance references have been added following consultation.
- 3.7 The SPD then sets out the following six design principles that are considered essential components in delivering good quality design, and which are widely documented (e.g. in

¹ TOWN CENTRE PLANNING POLICY STRATEGY: BROMLEY AND ORPINGTON, available from: https://cde.bromley.gov.uk/documents/s50080729/20200310114417_017114_0037666_Executive010420DRAFTTownCentrePlanningPolicyStrategyBromleyandOrpi%2018.pdf

² Statement of Executive Decisions on reports due to be considered at the cancelled Executive meeting on 1st April 2020 following consultation with PDS Committee Members, available from: <https://cde.bromley.gov.uk/documents/b50014566/Decision%20Statements%20Wednesday%2001-Apr-2020%2019.00%20Executive.pdf?T=9>

³ ORPINGTON TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT – CONSULTATION DRAFT, available from: <https://cde.bromley.gov.uk/documents/s50095929/Exec%20090222%20Orpington%20SPD%20Report.pdf>

Development Plan policy and national planning policy) as being among the key characteristics of successful well-designed places:

- Contextual (Character and Identity)
- Responsive (Architecture and Landscape)
- Connected (Movement and Connectivity)
- Inclusive (Access and Inclusion)
- Healthy (Health and Well-being)
- Sustainable (Sustainable Design, Adaptability and Resilience)

- 3.8 These principles mirror the design principles proposed in the emerging Urban Design Guide SPD. Having these consistent principles threaded through the borough's planning guidance is important as it creates consistency and sets out clear design parameters which development proposals should consider from the very first stages of designing a scheme.
- 3.9 The principles are supported by guidance notes which are a short summary of how the principles should be applied, and which cite specific policy and guidance which is relevant to the respective principles. In response to comments received during public consultation, amendments have been made to the design guidance notes relating to some of the principles, primarily the addition of further policy and guidance references.
- 3.10 The SPD then sets out three character areas and six sub-areas within them. These areas were derived through consideration of the context of the wider area and represent those parts of the area which are considered to have similar characteristics. They are not intended to be finite boundaries; they are identified for the purposes of the SPD to set out relevant guidance applicable to each area. They have been drawn with deliberately 'soft' edges reflecting the fact that boundaries between character areas are fluid rather than 'fixed'. An amendment has been made to clarify that the sub-areas are not self-contained in terms of the impacts of development, and that proposals in one area can impact on another area, or areas.
- 3.11 There are a series of general guidance notes which apply across the character areas, relating to various topics including density, tall buildings and sustainability. For transport and connectivity, a map is provided at Figure 4 to show the location of potential new connections to improve connectivity across the town centre. This map has been amended following consultation to clarify that these routes are not literal; they do not mean that buildings will be demolished to make way for new roads or paths, they merely show that where development comes forward, the Council would like to see connectivity improvements in these directions.
- 3.12 More specific guidance is provided for each character area. This includes some key parameters to guide the development of specific sites in the areas (where appropriate) and the identification of potential development opportunities. The development opportunities are indicative, as only the Local Plan allocates sites. The character area guidance sets out detailed design considerations for the areas, including identification of relevant reference heights to inform the assessment of the height of proposals; details of specific public realm and green connections that should be provided; and, where appropriate, details of any prominent materials and design styles which could influence the style of new development.
- 3.13 Each character sub-area includes a plan of area which visualises the key elements of the specific character area guidance.
- 3.14 A number of amendments have been made to the character area sections, notably the

Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre section. A significant number of comments received related to this area. The following amendments have been made:

- Guidance provided on the leisure centre, setting out the preferred option of retention within the town centre and highlighting relevant policies that will apply where any redevelopment comes forward. There is also new guidance encouraging provision of temporary facilities during any closure period; where temporary reprovision is not possible, the SPD states that any closure period should be kept to a minimum.
- An amendment to clarify the guidance relating to a potential tall building at the Walnuts Shopping Centre site.
- Guidance on the Saxon day centre, setting out that any redevelopment should ensure improved quality provision and should remain equally as accessible for its users. The new guidance encourages provision of temporary facilities during any closure period; where temporary reprovision is not possible, the SPD states that any closure period should be kept to a minimum.
- An amendment to guidance relating to Orpington College to note that Local Plan policies 20 and 27 will be key considerations for any development that comes forward on the college site.

3.15 The Orpington Station & York Rise sub-area has also been amended to remove reference to the Site 12 development opportunity, as this site now has permission and is progressing towards completion.

4. TRANSFORMATION/POLICY IMPLICATIONS

4.1 SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.

4.2 The Orpington Town Centre SPD provides guidance to assist with the implementation of the Local Plan, London Plan, NPPF and other documents.

5. FINANCIAL IMPLICATIONS

5.1 The production of the Orpington Town Centre SPD and the costs associated with adoption will be funded from the Planning Policy and Strategy budget.

6. LEGAL IMPLICATIONS

6.1 The SPD has been prepared in line with relevant planning guidance and regulations, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). If adopted, the SPD will be a material consideration in the determination of relevant planning applications. Any requirements relating to adoption will be undertaken in line with regulations.

6.2 A Screening Statement to determine the need for a Strategic Environmental Assessment (SEA) has been prepared by officers, in accordance with the requirements of European Directive 2001/42/EC; and the Environmental Assessment of Plans and Programmes Regulations 2004; this is provided at Appendix 3. The screening has concluded that an SEA does not need to be prepared as the SPD does not introduce new policies but provides

further guidance on adopted Development Plan policy. This policy has been sufficiently appraised in the Sustainability Appraisals of the Local Plan and London Plan documents; it is considered that the Orpington Town Centre SPD will not result in any additional significant effects to those already identified through these higher-level Sustainability Appraisals.

- 6.3 This approach is consistent with national planning guidance which states that SPDs are only likely to require an SEA in exceptional circumstances, where they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies.
- 6.4 There is a requirement to consult three statutory consultation bodies designated in the SEA Regulations (the Environment Agency, Historic England and Natural England) on whether an environmental assessment is required. Officers have consulted each of the three bodies prior to the consultation on the draft SPD and as part of the draft SPD consultation. Comments received are set out in Appendix 3.
- 6.5 The screening statement has been updated following the consultation and consideration of comments on the SEA from two respondents (an individual and Historic England). Historic England raised concerns that the SPD constituted new policy and allowed tall buildings without proper assessment, and noted that this may have an adverse impact on the historic environment. As a result they considered that an SEA would be required.
- 6.6 Officers have reviewed the SEA screening statement in light of the comments received, and consider that the responses to the SEA criteria set out in tables 1 and 2 remain appropriate as set out in the initial draft SEA screening statement. As noted above, officers consider that an SEA will not be required for the Orpington Town Centre SPD.

7. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 7.1 The Orpington Town Centre SPD supports the implementation of London Plan and Local Plan policies on carbon reduction. The SPD does not introduce new policy but will help to deliver existing policy in the Orpington Town Centre area and lead to positive outcomes.

8. IMPACT ON THE LOCAL ECONOMY

- 8.1 The Orpington Town Centre SPD supports the implementation of London Plan and Local Plan economic policies, particularly policies which promote economic activity in town centres.

9. IMPACT ON HEALTH AND WELLBEING

- 9.1 The Orpington Town Centre SPD supports the implementation of London Plan and Local Plan policies relating to health and wellbeing, including policies which aim to protect social infrastructure. The SPD includes the 'Healthy' design principle which notes that development proposals should seek to promote and prioritise health and well-being.

<p>Non-Applicable Sections:</p>	<p>IMPACT ON VULNERABLE ADULTS AND CHILDREN</p> <p>PERSONNEL IMPLICATIONS</p> <p>PROCUREMENT IMPLICATIONS</p> <p>PROPERTY IMPLICATIONS</p> <p>CUSTOMER IMPACT</p>
<p>Background Documents: (Access via Contact Officer)</p>	<p>Bromley Local Plan 2019, available from: https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan</p> <p>London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf</p> <p>National Planning Practice Guidance – https://www.gov.uk/guidance/plan-making</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - https://www.legislation.gov.uk/uksi/2012/767/contents</p>

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THE LONDON BOROUGH
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Orpington Town Centre Supplementary Planning Document

Adopted July 2023

Bromley Council

Orpington Town Centre Supplementary Planning Document - adopted 5 July 2023
For more information about this document, please contact:

Bromley Planning Policy Team

Email: ldf@bromley.gov.uk

1.	A Vision for Orpington Town Centre.....	1
	Introduction.....	1
	Vision for Orpington.....	3
2.	Policy framework	6
	National planning policy and guidance	6
	London planning policy and guidance	7
	Local planning policy and guidance.....	8
	Infrastructure delivery.....	10
3.	Context.....	11
	Townscape and Growth Analysis	11
	Topography.....	11
	Land use.....	12
	Scale and Character	12
	Heritage	13
	Green Networks	14
4.	Design Principles.....	15
	Contextual (Character and Identity).....	15
	Responsive (Architecture and Landscape).....	16
	Connected (Movement and Connectivity)	17
	Inclusive (Access and Inclusion)	18
	Healthy (Health and Wellbeing).....	19
	Sustainable (Sustainable Design, Adaptability and Resilience).....	20
5.	Character areas	22
	Character areas and sub areas	22
	General guidance for character areas	26
6.	Orpington East	36

	Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre	36
	Eastern Edge.....	40
7.	Orpington North	43
	The Village.....	43
8.	Orpington West	46
	Orpington High Street	46
	Western Edge.....	49
	Orpington Station & York Rise	51

1. A Vision for Orpington Town Centre

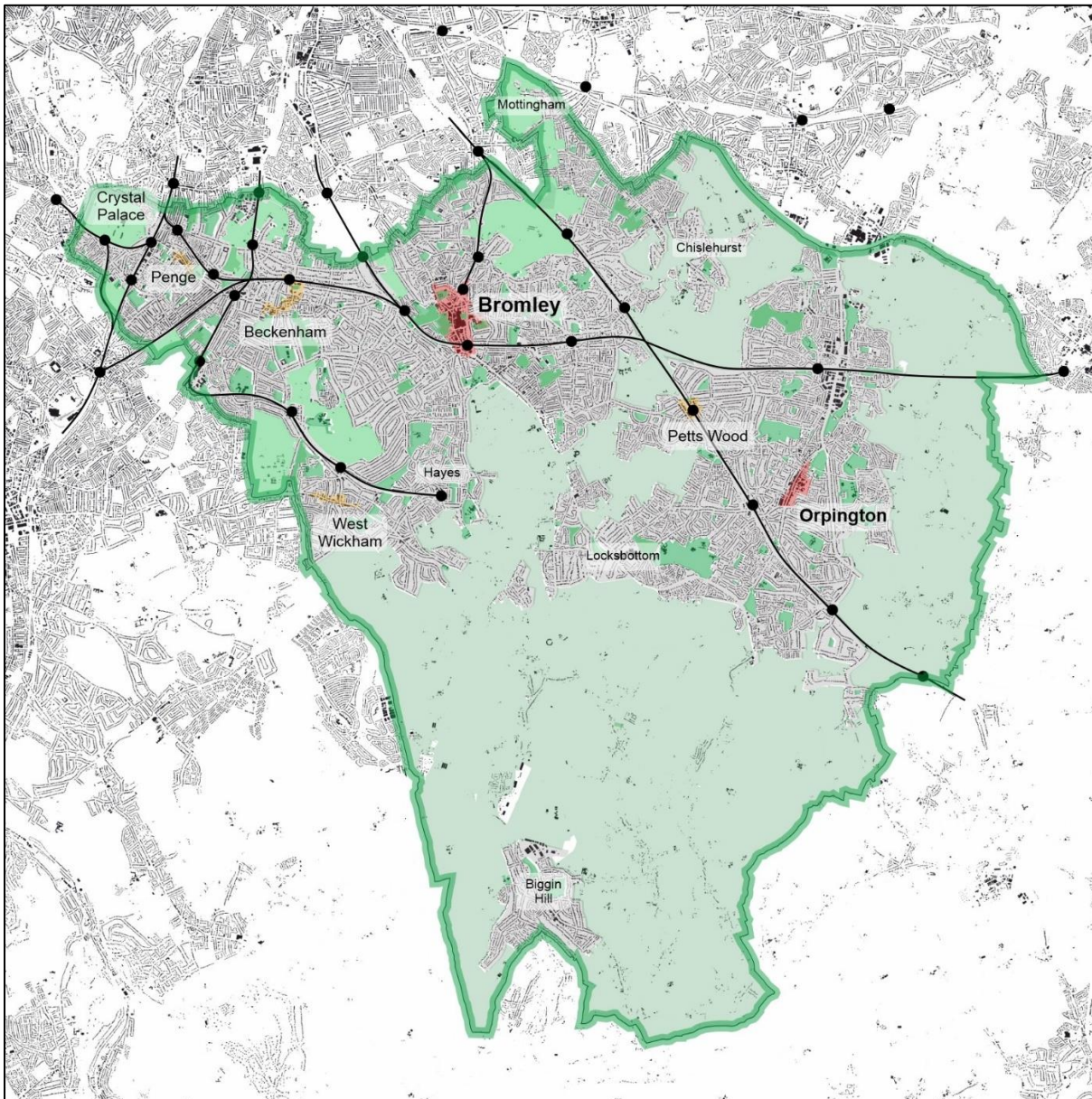
Introduction

- 1.1. Orpington Town Centre is set within the Cray Valley and located on the suburban Green Belt fringe of the London Borough of Bromley. It is a Major Town Centre, as set out in the Bromley Local Plan¹ and the London Plan², which together make up the statutory Development Plan, for the Borough.
- 1.2. The nature of the London Borough of Bromley is predominantly suburban, with district centres interspersed with large areas of open Green Belt countryside, urban areas are mainly concentrated in the north west of the borough. The two key centres, Bromley Town Centre and Orpington Town Centre, each have distinct residential catchment areas with significant wedges of open space designated either Green Belt or Metropolitan Open Land separating the two areas. Orpington's catchment includes rural villages such as Chelsfield, Farnborough, Pratts Bottom and Downe.

¹ Bromley Local Plan (adopted January 2019), available from:
<https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan>

² London Plan (adopted March 2021), available from:
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Figure 1: Borough context map



- 1.3. This Supplementary Planning Document (SPD) provides guidance on the interpretation of adopted planning policies as they relate to the Orpington Town Centre area; it does not set out new planning policy, as this cannot be done in an SPD. The Council is undertaking a review of the Local Plan; this SPD will help to inform preparation of this document, in relation to policies for Orpington Town Centre and the surrounding area.
- 1.4. Guidance is provided through a number of ‘SPD guidance notes’ set out in later sections of the document; these guidance notes include references to relevant policies and guidance where appropriate (although these are not exhaustive and there may be other relevant policies and guidance which apply). The SPD assesses the varied characteristics of Orpington by reference to character areas, and within them further sub-areas.
- 1.5. Some of the character areas include ‘development opportunities’ (including allocated and non-allocated sites). For non-allocated sites, the guidance does not equate to a site allocation. The intent of providing guidance for these non-allocated sites is to identify broad development parameters which may be suitable, but the guidance defers to the need for detailed justification to address relevant policy requirements in the adopted Development Plan.
- 1.6. The SPD will be a material consideration in the determination of relevant planning applications within the area covered by the document.
- 1.7. The Council also has a range of strategies which should be read alongside this SPD, including the Regeneration Strategy³ and Economic Development Strategy⁴.

Vision for Orpington

- 1.8. The Bromley Local Plan sets out the Vision for the Borough through to the 2030’s, the majority of which is directly applicable to aspirations for Orpington:

“Bromley is known for the high quality of its living, working and historic 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 values its distinctive neighbourhoods, ranging from the rural to suburban and urban. 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.

The protection and enhancement of conservation areas and heritage assets, along with high quality new development have contributed to civic pride and wellbeing.

The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley’s special character and the health and wellbeing of local residents and visitors alike.

Bromley has high levels of educational attainment, whilst strong and diverse businesses are able to invest to support a thriving economy.”

³ London Borough of Bromley Regeneration Strategy 2020 to 2030, available from: <https://cds.bromley.gov.uk/documents/s50083012/RegenerationStrategy.pdf>

⁴ London Borough of Bromley Economic Development Strategy 2021 to 2031, available from: <https://www.bromley.gov.uk/downloads/file/1749/economic-development-strategy-2021-to-2031>

- 1.9. Taking account of the Local Plan vision and consideration of Council priorities for the town centre and public consultation feedback, the following vision will underpin this SPD and sets out the key aspects of how Orpington should develop:

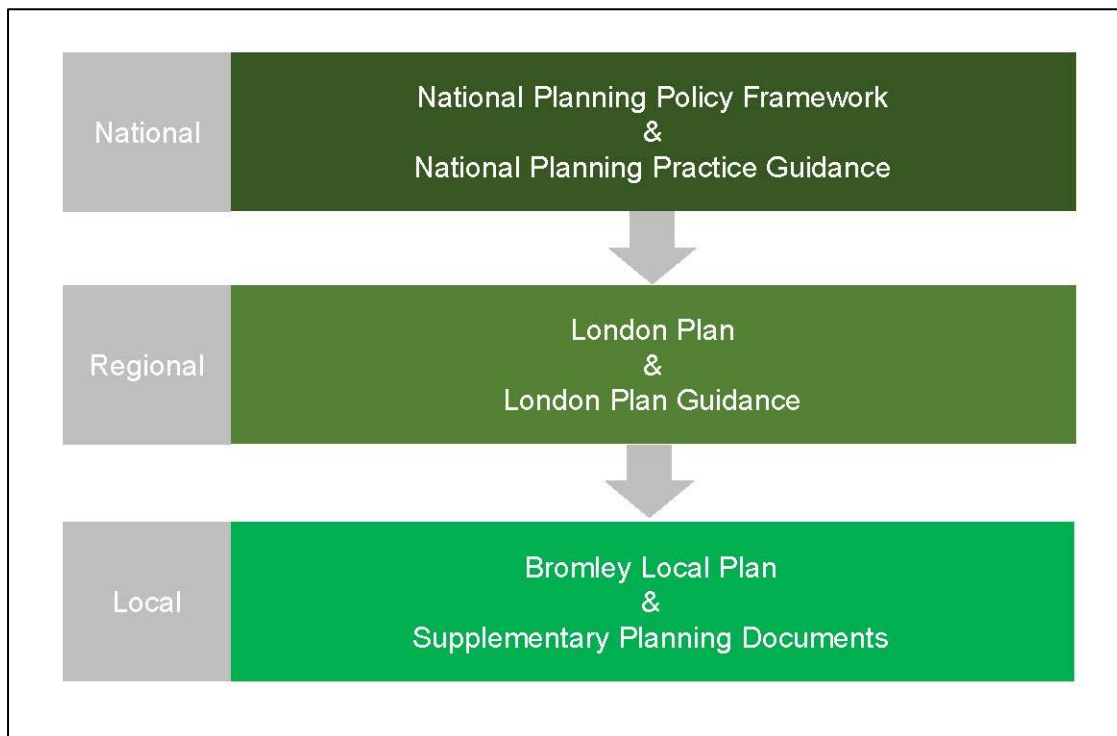
Vision for Orpington

- Orpington Town Centre will be a thriving Major centre with a strong social, leisure, retail, education, culture and heritage offer, supporting the health and wellbeing of the south-eastern area of the Borough. It will complement the role of Bromley Metropolitan Town Centre providing a lively centre addressing a range of the needs of surrounding communities.
- The town centre environment will comprise streets, squares, places, courtyards and ways, responsive to the human scale and easily navigable. Movement through Orpington's key spaces should be easy and legible. Different areas will be recognisable due to the character and scale of surroundings, with buildings helping to define places and historic structures being a natural part of the town and how it is composed. Historic 'gaps' in the fabric of the town, especially between the High Street and surrounding neighbourhoods, should be enhanced
- Orpington will be integrated and carefully connected to its surrounding suburbs and landscapes, though remaining distinct from these areas in terms of its role and character. It's green spaces and historic parks & gardens will be connected to form a well-programmed and ecologically rich sequence of landscapes and spaces. Orpington will celebrate its location embedded in the Cray Valley landscape, and its proximity to the Green Belt.
- Orpington will be a place where heritage assets are respected and referenced by new development. The area has a strong historic environment with a number of listed and locally listed buildings and a conservation area.
- Orpington will be a people-focused town centre where pedestrian movement will be prioritised, and traffic impacts on public spaces will be minimised. The High Street, Market Square, and the original settlement in Orpington Priory Conservation Area should first and foremost be places to dwell and enjoy.
- Orpington will provide a place to work and collaborate including formal office space but also flexible, dynamic spaces for start-ups and creative workspace and spaces that are responsive to new working patterns post-pandemic.
- Orpington will be resilient and able to deal with social, environmental and economic challenges and changes, including mitigating and adapting to climate change, weathering economic cycles and enduring the changing nature of our town centres. Spaces and development types should promote cultural, economic, education, social and leisure activity without constraining future transformations.

2. Policy framework

2.1. The policy framework for Bromley encompasses planning policy and guidance at a national, regional and local level.

Figure 2 – policy framework diagram



National planning policy and guidance

- 2.2. The National Planning Policy Framework⁵ (NPPF) sets the national policy context for preparation of local plans. Local Plans must be consistent with national policy and should enable the delivery of sustainable development in accordance with the policies in the NPPF. The NPPF is also capable of being a material consideration in the determination of planning applications. The current version of the NPPF was published in July 2021. National Planning Practice Guidance⁶ (PPG) provides further detail on various aspects of the NPPF.
- 2.3. The NPPF sets out a range of policies addressing matters including the areas of economy, town centres, sustainability and design; and advises that strategic policy-making authorities should “set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools

⁵ National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

⁶ Planning Practice Guidance, available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.” (Paragraph 73c).

- 2.4. The NPPF also advises that *“significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”* (Paragraph 134)
- 2.5. To support future design codes, the National Model Design Code⁷ (NMDC) provides a framework for local authorities to develop their own localised codes; based on the ‘ten characteristics of a well-designed place’ as set out in the National Design Guide⁸ (NDG) and expanded upon within the NMDC.
- 2.6. The Environment Act received royal assent in November 2021. Once the provisions of the Act are commenced in 2023, it will mandate a minimum 10% Biodiversity Net Gain (BNG) with the aim of leaving the natural environment in a measurably better state than beforehand. The Act also proposes the use of a recognised Biodiversity Metric to assist with calculating BNG.

London planning policy and guidance

- 2.7. The Mayor of London produces a spatial development strategy (known as the London Plan). The current version of the London Plan was adopted in March 2021. The London Plan forms part of the Development Plan for each of the London local planning authorities and is used to assess planning applications.
- 2.8. Orpington is one of 34 Major centres in Greater London and the only one in the Borough, making it the second most significant centre after Bromley Town Centre. The nearest ‘Major’ centre is Eltham in Greenwich Borough, approximately 10 miles away. Orpington is identified in the London Plan as a centre that should see medium levels of residential growth.
- 2.9. There are a number of relevant London Plan policies that could apply to development proposals in Orpington, including:
 - Policies D1-D9, which set out a design and character-led approach to growth;
 - Policy D12, which relates to fire safety and aims to ensure that the fire safety of development is considered at the outset.
 - Policy HC1 which seeks to protect heritage assets including conservation areas;
 - Policy HC5, which seeks to protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres;
 - Policy G5, which sets out a requirement for certain development proposals to provide urban greening in line with a target ‘Urban Greening Factor’ score.
 - Policy T6, which stipulates that development in Major and Metropolitan town centres and in areas with a PTAL rating of 5-6 should be car-free; and
 - Policies SD6-SD9, which set out a number of policies for town centre development which follow a ‘town centre first’ approach to intensification and commercial uses.

⁷ National Model Design Code (July 2021), available from: <https://www.gov.uk/government/publications/national-model-design-code>

⁸ National Design Guide (January 2021), available from: <https://www.gov.uk/government/publications/national-design-guide>

2.10. The Mayor also has a number of adopted and draft London Plan Guidance (LPG) documents⁹ which provide further detail on policies set out in the London Plan. This includes the Fire Safety LPG¹⁰.

Local planning policy and guidance

2.11. The Bromley Local Plan was adopted in January 2019. The Local Plan sets out a number of planning policies, site allocations and land designations for the Borough, and along with the London Plan (2021) forms the Borough's Development Plan (used to assess planning applications). The Local Plan is accompanied by the Policies Map which illustrates geographically the application of the policies in the Local Plan.

2.12. The Local Plan requires development within Orpington Town Centre to provide a range of uses that will contribute towards its role as a Major Centre. Relevant policies supporting this requirement are set out below:

- Orpington is contained within one of Bromley's five Renewal Areas, the Cray Valley Renewal Area.
 - Policy 13 defines the purpose of Renewal Areas, including as places where proposals should provide demonstrable economic, social and environmental benefits and address identified issues and opportunities.
 - Policy 14 states that development in Renewal Areas should demonstrate how their benefits as set out in Policy 13, and where appropriate be guided by Development Briefs or other guidance.
 - Policy 17 defines expectations of the Cray Valley Renewal Area:

“Proposals within the Cray Valley Renewal Area will be expected to maximise opportunities:

a - to create a successful economic “growth area” along the Cray Valley, including the Cray Business Corridor, supporting the health and wellbeing of the community; and

b - to protect and enhance the green wildlife corridor along the River Cray, integrating with the public realm, along highways and open spaces and through commercial and industrial areas by creative design, and

c - to support Orpington Town Centre in its role, as a Major Town Centre, serving the east of the Borough in respect of retailing and community services and developing a thriving retail, office and leisure economy.”

- Policy 20 supports the provision of accessibly located and designed facilities to meet community needs and resists the loss of community facilities.
- Policy 21 addresses opportunities for community facilities including ‘meantime uses’, community hubs and sports and recreation facilities in areas of deficiency or where they present a tool for renewal and recreation.
- Policy 22 expects new developments to provide social infrastructure appropriate to the nature and scale of the proposal.
- Policy 26 requires applications to maximise opportunities to support and enhance health & wellbeing, encouraging physical activity, providing accessible and adaptable new dwellings, ensuring appropriate access to open space, particularly in areas of deficiency, and optimising health benefits throughout scheme design.

⁹ Available from: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs>

¹⁰ Available from: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/fire-safety-lpg>

- Policy 27 defines land with permitted use for education purposes (including colleges) as 'Education Land' and safeguards this land for education purposes.
- Policy 37 requires all development proposals to be of a high standard of design and layout.
- Policies 38 and 39 concern listed and locally listed buildings. There are a number of listed and locally listed buildings within the town centre.
- Policies 41 and 42 concern conservation areas and areas adjacent to such areas. The Orpington Priory conservation area covers the northern part of the town centre, while the Broomhill conservation area lies to the west of the town centre.
- Policy 45 impacts upon Priory Gardens as it is a Historic Park and Garden. Applications within or adjoining a Registered Historic Park or Garden will be expected to protect the special features, historic interest and setting of the park or garden.
- Policy 48 identifies 'Views of Local Importance'; relevant views for Orpington are the view east over Kent from Crofton Road, Orpington, and the view from Chelsfield Green looking North towards the Cray Valley.
- Policies 59 and 79 set out 'Areas of Local Park Deficiency' and 'Areas of Deficiency in Access to Nature'; Orpington Town Centre is included in both types of deficiency.
- Policy 78 advises that the Council will assess the likely impact on the quality and character of green corridors through the Borough and will seek and support appropriate enhancement and management.
- Policy 85 aims to retain good quality office floorspace by safeguarding Knoll Rise (and two other clusters in the borough) as 'office clusters'. 'Redevelopment proposals will be expected to provide at least the same quantum of office floorspace' in these locations. The office cluster designation seeks the promotion and retention of office premises and floorspace. The Knoll Rise office cluster contributes significantly to the boroughs commercial function. Article 4 Directions¹¹ are in force to withdraw permitted development (PD) rights in the Knoll Rise office cluster, including PD rights for change of use from Class E to residential. The removal of PD rights through the Article 4 Direction enables the Council to plan properly and ensure uses which contribute significantly to economic growth are protected.
- Policy 91 aims to limit town centre uses to town centre sites wherever possible, and to ensure proposed uses have a positive impact on town centre vitality and viability
- Policy 92 aims to preserve and enhance active frontages and ensure that changes of use away from A1 are carefully managed¹², to different degrees for primary and secondary frontages. Criteria for secondary frontages are less onerous than those for primary.
- Policy 97 sets out criteria for how proposals for conversion of upper floors in town centres will be assessed and aims to preserve office space where possible
- Policy 98 aims to ensure appropriate delivery of restaurants, pubs and hot food takeaways in town centres.
- Policy 99 aims to manage the change of use of town centre ground floors from retail to residential uses. Such proposals will be permitted subject to a number of criteria including not undermining retail vitality and viability.
- Policy 100 aims to retain market trading in town centres and encourage new markets, subject to criteria. Orpington has an existing market within the 'market square' pedestrianised area.
- Policy 101 aims to retain shopfronts of architectural merit and sets out criteria for the design of existing and new shopfronts.

2.13. The Council has prepared the Urban Design Guide SPD to provide clear guidance on urban design to inform and engage developers, applicants, planning officers, residents and all other interested parties in bringing forward proposals for development in Bromley. The Urban

¹¹ Available from: <https://www.bromley.gov.uk/PermittedDevelopment>

¹² The former A1 Use Class has now been subsumed into Use Class E.

Design Guide SPD will be relevant to development within Orpington, including guidance on inclusive design, tall buildings, biodiversity, shopfronts, designing out crime and public realm; it is not necessary to repeat the detailed guidance in the Orpington Town Centre SPD, although the guidance in this document does reflect the six design principles set out in the Urban Design Guide SPD.

Infrastructure delivery

- 2.14. The Community Infrastructure Levy (CIL) allows charging authorities in England and Wales to raise funds from developers undertaking new development, to help fund new or improved infrastructure required to support the growth identified in adopted Local Plans. CIL replaces much of the existing process of planning obligations commonly known as Section 106 (S106) agreements.
- 2.15. In Bromley, both a Mayoral CIL and local CIL are applied to relevant planning permissions (applications with an applicable charging rate which are determined after the relevant CIL charging schedule has come into effect). The Mayoral Community Infrastructure Levy¹³ (known as MCIL2) took effect on 1 April 2019; and the Bromley Community Infrastructure Levy¹⁴ (CIL) took effect on 15 June 2021.
- 2.16. The Infrastructure Delivery Plan (IDP) 2016 set out the infrastructure required to support planned growth identified in the Local Plan, over the period 2016-2031. The IDP was updated as part of the preparation of the Bromley CIL¹⁵.
- 2.17. The majority of Orpington-specific infrastructure projects detailed in 2016 IDP have been completed, notably:
- the Orpington Health & Wellbeing Centre, which opened in the town centre in 2019;
 - public realm improvements in the Walnuts shopping area;
 - investment in the Hospitality, Catering and Enterprise Careers College; and
 - cycle hub secure storage at Orpington Station.
- 2.18. However, as pressures and expectations evolve, there is likely to be an on-going need for a range of enhanced infrastructure, including green, transport, social, energy, waste and digital infrastructure.
- 2.19. Planning obligations may still be sought on specific schemes, particularly to secure affordable housing, transport, open space, green infrastructure and carbon offsetting contributions, and to secure mitigation of any site-specific impacts (including through provision of any site-specific infrastructure necessary in addition to CIL). The Planning Obligations SPD¹⁶ sets out the Council's approach to securing planning obligations.

¹³ Mayoral Community Infrastructure Levy, available from: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>

¹⁴ Bromley Community Infrastructure Levy, available from: <https://www.bromley.gov.uk/planning-policy/bromleys-community-infrastructure-levy>

¹⁵ Infrastructure Delivery Plan (IDP) Update Report 2020, available from: <https://www.bromley.gov.uk/downloads/file/698/london-borough-of-bromley-infrastructure-delivery-plan>

¹⁶ Planning Obligations SPD (June 2022), available from: <https://www.bromley.gov.uk/planning-policy/planning-obligations-supplementary-planning-document>

3. Context

Townscape and Growth Analysis

- 3.1. Orpington has a character reflecting its development over time, dating back to the Stone Age activities along the Cray Valley. The origins of the village are centred around the Priory building towards the southern end of the Cray Valley. Orpington remained a small Kentish village in a rural setting well into the 19th Century.
- 3.2. The arrival of the railway in 1868 brought early residential development to the Crofton and Broom Hill areas. From its village origins, the expansion of the railway station and residential development led to significant growth throughout the latter part of the 19th and early 20th Century.
- 3.3. Early maps show a predominantly linear village form extending about half a mile along the High Street, stretching towards the station and forming an extension of routes along the Cray River valley. The town was centred on the intersection of Church Hill, with the White Hart Inn and Post Office located on the west side of High Street.
- 3.4. The suburban development of Greater London led to significant interwar suburban development. The town became a bustling centre for businesses servicing the surrounding residential population and the industrial areas in the Cray Valley.
- 3.5. During the 20th century there was a consolidation of this urban form. Whilst this period saw transformation of much of the town centre, with new retail premises and road-widening projects at the southern end of High Street, the northern end retains a village scale and form; the earlier rural village setting is reflected today by the extensive Priory Gardens.
- 3.6. The High Street developed south west towards the station, tracking the valley floor to the war memorial. Development rises up steeply either side of the High Street, to the west (NNW) with predominantly residential development and areas of commercial development as the High Street draws closer to the station. The rising land to the east, beyond the town centre development in the valley floor, comprises suburban residential development.

Topography

- 3.7. The town centre is located within the Cray Valley, with land rising upwards to both the east and west of the town centre. The change in topography is a key characteristic of the town centre and an important consideration for future developments. Orpington Town Centre has good accessibility via public transport; however, Orpington Station is situated outside the town centre and is accessed via a relatively steep walking route. Future developments in the town centre should seek to address these topographical challenges with the aim of providing new development which can be accessed by sustainable modes of transport, consistent with Development Plan policy.

Land use

- 3.8. Orpington has become a major suburban town centre, serving a large residential catchment which fans out east towards the Green Belt and west, encompassing the suburbs of Petts Wood, Crofton and Farnborough. The residential areas of St Mary and St Pauls Cray to the north and Chelsfield and Pratts Bottom to the south all fall within the hinterland of Orpington Town Centre.
- 3.9. The town centre provides a range of comparison and convenience retail, office, leisure (including the Walnuts Leisure centre and Odeon cinema) and community facilities, education (Orpington College) and civic functions (including Orpington Library). Critically Orpington Station to the west of the defined town centre also provides direct rail links to Central London.
- 3.10. Recent changes to the Use Classes Order could have an impact on the retail offer in Orpington, as shops can now convert to previously separate uses such as cafes, restaurants and estate agents without requiring planning permission. Additionally, new permitted development rights allow Class E uses to convert to residential use. The Council is putting in place Article 4 Directions to remove these new permitted development rights in Orpington Town Centre.
- 3.11. The successful retail offer in Orpington has been maintained in recent years. During the pandemic, the use of the public realm has been enhanced, supporting the commercial use of the pavement by cafes and restaurants. The town centre has shown remarkable resilience during the pandemic, with few long-standing vacant units remaining.
- 3.12. Orpington 1st is the Business Improvement District (BID) for Orpington Town Centre¹⁷. The BID was first established in 2013; the BID uses levy payments from local businesses to provide services and develop projects within the BID area, for the benefit of local businesses, residents and visitors.

Scale and Character

- 3.13. Orpington Town Centre has a strong sense of place and commercial vitality, especially along its High Street and within the Orpington Priory Conservation Area. It also benefits from good quality adjacent suburbs, landscapes and historic environments.
- 3.14. The High Street is characterised by 2-3 storey buildings, predominantly narrow fronted shops with residential flats above. These are punctuated by several larger buildings generally set on corners or other key sites. The northern end of the High Street has retained a village scale and form reflected in the street width and placement of buildings flush against the street frontage.
- 3.15. The Orpington Priory and Broomhill Conservation Areas are distinct areas which have particular architectural or historic interest, as set out in the respective Conservation Area SPGs.
- 3.16. Church Hill runs perpendicular from High Street to All Saints' Church past several important buildings which have heritage significance.
- 3.17. Aynscombe Angle to the north of the High Street is a cohesive grouping of terraced houses conceived and developed as a group with a strong consistency in form and materials but with

¹⁷ Details of Orpington 1st are available from: <http://www.orpington1st.co.uk/>

variations of detail. Incremental changes to the component buildings since their construction have generally been sympathetic to this consistency.

- 3.18. Housing typologies across Orpington are varied as a result of the town's growth over time. The majority of homes in Orpington are interwar semi-detached houses with sizable gardens which extend up to, and radiate out from, the town centre. Small greens and school playing fields are located within built up areas, with the eastern boundary defined by Green Belt. Orpington benefits from the open green space of Priory Gardens in the heart of the town, as well as Poverest Park and other incidental landscapes and parks nearby.

Heritage

- 3.19. Heritage designations and assets in Orpington Town Centre reinforce local distinctiveness in the town centre.
- 3.20. Orpington Priory Conservation Area, located in the northern part of the town centre, includes the town's most significant concentration of listed buildings, located in the historic village centre. The house known as Barn Hawe (formerly Fern Lodge) dates from the 1770s and is Listed Grade II, as are the timber-framed outbuildings of The Priory. The Priory is Listed Grade II* and includes elements dating from the fifteenth century with successive enlargements and changes, notably the timber-framed seventeenth century extension. Orpington Priory Conservation Area also includes 35 Locally Listed Buildings, which are of additional importance in a townscape and heritage character context
- 3.21. Orpington Priory Conservation Area Statement SPG (2002) sets out guidance and advice for the maintenance, preservation and enhancement of Orpington Priory Conservation Area, which covers the historic, pre 19th century heart of Orpington. The SPG divides the Conservation Area informally into three areas or 'sub-elements':
- 'the older shops and business premises which remain along the northern end of High Street still reflecting a village form;
 - the planned residential group in Aynscombe Angle; and
 - the axis of development up Church Hill, including The Priory and its gardens, and All Saints' Church and churchyard.'
- 3.22. This subdivision and the analysis of the qualities and attributes of these areas, as set out in the SPG, is relevant for this SPD.
- 3.23. The Broomhill Conservation Area lies to the west of the town centre, centred on Broomhill Common. This Conservation Area includes five locally listed buildings. The Broomhill Conservation Area (and the associated SPG) could also be a relevant consideration for development in the town centre.
- 3.24. Other non-designated heritage assets as defined in the National Planning Policy Framework which are identified during the course of any proposals are important to consider.
- 3.25. The Local Plan (policy 46) identifies a number of areas which may have important archaeological remains surviving. If a proposed development takes place in these areas, then the preservation or recording of archaeological remains will be an important consideration. Historic England has recently reviewed Bromley's archaeological priority areas; this review will be a relevant material consideration for planning applications in Orpington¹⁸. The majority of Orpington Town Centre is covered by an archaeological priority area (as set out in the recent

¹⁸ Further information is available on the 'Archaeology in Bromley' webpage, available from: <https://www.bromley.gov.uk/local-history-heritage/archaeology-bromley>

Historic England review), including the entirety of the Orpington Priory Conservation Area. The London Plan policy HC1 will also be relevant to any development proposals within these areas.

- 3.26. Crofton Roman Villa, a Scheduled Ancient Monument, is sited adjacent to 19th and 20th Century commercial and transport development at Orpington Station. Though well protected by the late 20th Century structure that encloses it, the Villa's impact on the wider public realm is currently minimal.

Green Networks

- 3.27. The presence of the River Cray and the Cray Valley is currently only visible in terms of landscape morphology, though it had a defining impact on the beginning of the settlement.
- 3.28. Orpington benefits from the beautiful and valued Priory Gardens Historic Park and Garden, in the heart of the town, as well as Poverest Park and other, incidental landscapes and parks nearby. However, the southern end of the town centre is identified as deficient in access to local parks and borders on an area deficient in access to nature. The town centre's position within the Cray river valley, offers opportunities for a connected, ecologically rich series of green spaces of various types to enhance the life of the town centre.

4. Design Principles

- 4.1. The Council has identified six overarching design principles (performance indicators) that are considered essential components in delivering good quality design, and which are widely documented as being among the key characteristics of successful well-designed places:
- Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 4.2. The guidance notes which relate to the design principles set out relevant policy and guidance which is relevant to the principles; this is not an exhaustive list and there may be other policies and guidance that apply to development proposals.

SPD guidance note 1

Development proposals should provide sufficient information to demonstrate how they have addressed the six design principles set out within this SPD and specific guidance relating to the character area within which they are located.

Relevant policy and guidance includes:

Local Plan – policies 4, 13, 26 and 37

London Plan – objectives GG1-GG6 and policies SD6-SD10; D2-D9; G1; T1, T2 and T4-T6; and DF1

NPPF – paragraphs 8-11, sections 5-9, 11-12 and 16

Contextual (Character and Identity)

- 4.3. Orpington has a strong architectural and cultural heritage with a distinctive character arising from its protected green spaces and open countryside. The success of new development in Orpington is largely dependent upon how well it relates to, and responds with, its surrounding context.
- 4.4. As set out in the NDG, well-designed places are based on a sound understanding of the surrounding context, influence their context positively and are responsive to local history, culture and heritage. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion. Well-designed places respond to existing local character and identity and contribute to local distinctiveness.
- 4.5. There are several historic buildings of notable architectural merit and local significance. A key urban design objective is to preserve and enhance the existing qualities of Orpington's townscape, landscape, and streetscape character.

- 4.6. The nature conservation context of an area is an important part of its character. The retention of trees and wildlife features of value, and the enhancement of biodiversity (for example through biodiversity net gain) can help to protect and enhance character. The replacement or relocation of species and habitats should only be a last resort, and replacement trees should reflect the existing value of the benefits of the trees removed.

SPD guidance note 2

Development proposals should make a positive contribution to the existing townscape and character, by identifying existing physical, natural, social and cultural assets and seeking to strengthen them in the design of new schemes in order to reinforce local identity and sense of place.

Relevant policy and guidance includes:

Local Plan – policies 13, 37, 38, 39, 41 and 42

London Plan – objectives GG1 and GG2 and policies SD6-SD10; D2-D5, D8, HC1, G1, G6 and G7

NPPF – sections 12 and 16

Responsive (Architecture and Landscape)

- 4.7. Good design is about making places for people and should seek to evoke a sense of joy and delight. Well-designed places focus not just on the physical characteristics of buildings and spaces but on how they are used and experienced. Quality is measured as much by experience as it is by appearance.
- 4.8. As set out in the NDG, well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context and proposed density, to create a coherent form of development that people enjoy.
- 4.9. Historically, the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions.
- 4.10. In order to achieve this careful consideration should be given to the key aspects of development form: layout, scale, height and massing, appearance and landscape. All new development should consider its relationship with both the immediate and wider context including neighbouring buildings, streetscape, townscape, urban grain, and local views, vistas and landmarks.
- 4.11. All new development should seek to reference local context to inform detail, materials, and landscape; incorporating and/or interpreting those elements that are attractive, valued and which contribute to the quality of the surrounding area. Architectural design and materiality should be sympathetic to the local vernacular and responsive to the surroundings so as not to undermine or compromise local character, identity and distinctiveness.

SPD guidance note 3

The Council will seek to promote design excellence to ensure that new development achieves the highest standards of visual, functional and environmental quality to engage and inspire people, reflecting local identity, values, and aspirations.

All major development proposals should be subject to independent design scrutiny by an appointed Design Review Panel bringing together leading professionals in the fields of architecture, urban design, landscape architecture, and environmental sustainability providing independent, expert advice to support the delivery of high-quality development.

All major development proposals should be subject to meaningful collaboration and community engagement ensuring that residents and stakeholders have the opportunity to inform and influence new development.

Relevant policy and guidance includes:

Local Plan – policy 37

London Plan – policies D2-D9

NPPF – section 12

Connected (Movement and Connectivity)

- 4.12. Ease of movement is integral to well-designed places, influencing how places function and feel. Creating better connections allows people to have greater choices between different modes of transport and greater access to social and economic opportunities both within and beyond their communities.
- 4.13. As set out in the NDG, successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries.
- 4.14. Well-designed streets contribute significantly to the quality of the built environment and play a key role in the creation of sustainable communities. The Council will seek to promote healthy streets and active lifestyles in accordance with London Plan and Local Plan policies by encouraging walking and cycling and promoting sustainable modes of transport.
- 4.15. Legibility is a key aspect of movement and a key urban design objective. A legible place is a place that is easy to understand and move through, new development can promote legibility by providing recognisable routes, focal points, nodes, and landmarks which stitch into the existing urban fabric. All new development should promote accessibility, legibility, and ease of movement by creating places that connect well with each other and the wider area.
- 4.16. Future opportunities to enhance active travel and improve permeability would align with the aims of the 'Connected' design principle, prioritising walking and cycling to facilitate safe, efficient, ease of movement as part of an integrated transport network, particularly east/west connections across the High Street and north/south connections between Homefield Rise and Priory Gardens.

SPD guidance note 4

Development proposals should establish a clear hierarchy of permeable routes and spaces ensuring that new connections correspond with existing routes to promote greater ease of movement and improve wider connectivity.

Relevant policy and guidance includes:

Local Plan – policies 31 and 34

London Plan – policies T1-T7

NPPF – section 9

Inclusive (Access and Inclusion)

- 4.17. Inclusive design is integral to good design. The built environment should be safe, accessible, and convenient for all, it is therefore essential that new development considers inclusive design principles from the outset.
- 4.18. Inclusive design “*aims to remove the barriers that create undue effort and separation, enabling everyone to participate equally, confidently and independently in everyday activities*”¹⁹. It is integral to good design.
- 4.19. Inclusive design places people at the heart of the design process, acknowledges diversity and difference, offers more than one solution when required, provides for flexibility in use, and provides buildings and spaces that are convenient and enjoyable for everyone.
- 4.20. As set out in the NDG, well-designed places are those designed to be inclusive and to meet the changing needs of people of different ages and abilities. This includes families, extended families, older people, students, and people with physical disabilities or mental health needs. They provide well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive.

SPD guidance note 5

Applicants should carry out meaningful engagement with relevant user groups at an early stage in the design process, which may include disabled people or older people’s organisations. Development proposals should achieve the highest standards of inclusive design, contributing to a built environment that is safe, accessible, and convenient for all.

Relevant policy and guidance includes:

Local Plan – policies 33 and 37

London Plan – objective GG1 and policy D5

¹⁹ See CABI guidance document ‘The Principles of Inclusive Design’, May 2006 - available here: <https://www.designcouncil.org.uk/resources/guide/principles-inclusive-design>

Healthy (Health and Wellbeing)

- 4.21. The places in which we live and work affect our health and well-being. Adopting healthy placemaking principles which prioritise our long-term health is an essential part of good urban design.
- 4.22. As set out in the NDG, well-designed places include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion. Well-designed homes and buildings are functional, accessible and sustainable. They provide good quality internal environments and external spaces that support the health and well-being of their users.
- 4.23. New development can help to provide strong, vibrant, sustainable communities by creating healthy environments which support both physical and mental health. In particular, the link between healthy homes and access to green open space and mental well-being is well documented.
- 4.24. The Council will promote healthy living by ensuring that new development seeks to maximise opportunities to support and enhance health and well-being, encouraging physical activity, providing accessible and adaptable homes, ensuring social inclusion and access to open space particularly in areas of deficiency, and optimising health benefits throughout each stage of the design process. New development can also help to combat loneliness, for example through design which delivers community infrastructure and which fosters social interaction²⁰.
- 4.25. Objective GG3 of the London Plan advocates use of Health Impact Assessments, which are used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, and to highlight any health inequalities that may arise. Health Impact Assessments should be undertaken as early as possible in the design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

SPD guidance note 6

Good design can significantly improve quality of life. Development proposals should seek to promote and prioritise health and well-being, demonstrating how Local Plan Policy 26a has been addressed. Major development proposals are encouraged to submit a Health Impact Assessment (HIA) to assist with the determination of health-related aspects of the proposed development. The scope of the HIA should be agreed with the Council at pre-application stage; this should include consideration of any best practice guidance for producing HIAs, including guidance produced by the NHS.

Relevant policy and guidance includes:

Local Plan – policies 13, 17 and 26

²⁰ 'Tackling Loneliness: A strategy for Bromley 2022 to 2026' sets out various actions the Council is taking to tackling the issue of loneliness, and may be a useful reference for applicants preparing planning applications. It is available at: <https://www.bromley.gov.uk/downloads/file/1165/tackling-loneliness-a-strategy-for-bromley-2022-to-2026>

London Plan – objective GG3 and policies SI 1 and SI 4

NPPF – sections 8 and 12

- 4.26. Orpington's location in the Cray Valley, along with some key backland sites and existing footpaths along the river valley, present an excellent opportunity to deliver a linked series of green spaces (existing and new) that run along the Cray valley corridor and enhance access to nature and access to green space, supporting physical and mental health.
- 4.27. Other opportunities to provide high-quality public space and support outdoor recreation should be prioritised, to enrich the appearance and public life of the town centre. Public space should take advantage of views and underused spaces – including spaces above ground floor level; this will allow larger and taller development to have public amenity value beyond street level.

SPD guidance note 7

Development proposals should explore opportunities to provide or enhance spaces which are publicly accessible and promote health and wellbeing. This might be in the form of public parks, tree planting, squares and gardens, pocket parks, and, where taller buildings are considered appropriate, public space at height such as viewing terraces, and rooftop gardens.

Relevant policy and guidance includes:

Local Plan – policies 26 and 59

London Plan – objective GG3 and policies D3, D9, G1, G4 and G7

NPPF – section 8

Sustainable (Sustainable Design, Adaptability and Resilience)

- 4.28. The NPPF highlights three interdependent overarching planning objectives in achieving sustainable development; economic (supporting growth), social (supporting communities), and environmental (protecting and enhancing our natural and built environment) that need to be considered collectively.
- 4.29. A key urban design objective is to ensure that new development achieves the highest standards of sustainable design and construction in accordance with national, London and local plan policies, to improve environmental performance by reducing energy demand, improving resource efficiency, and by encouraging the efficient use of buildings and previously developed land.
- 4.30. The London Plan highlights the importance and multifunctional benefits of green infrastructure (an important element of sustainable design) which include promoting physical and mental health, enhancing local biodiversity, and its role in helping to adapt to the impacts of climate change. Air quality, cooling, and flood mitigation can all be addressed in part with green infrastructure. Consideration of groundwater sensitivity is also important, to ensure that water resources are not contaminated by polluting developments.

- 4.31. As set out in the NDG, well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change, is fit for purpose and adaptable over time and adopts technologies to minimise their environmental impact.
- 4.32. The most successful places are those that are adaptable to change and are able to continually evolve in order to remain vibrant. Places need to be adaptable at every scale.

SPD guidance note 8

Development proposals should be designed to allow for future social, economic, and environmental change to accommodate the needs of both existing and future communities. Development proposals should achieve high sustainability standards in line with the London Plan and relevant LPGs. This should include adopting circular economy approaches to promote resource efficiency and address the challenge of climate change, and the use of Whole Lifetime Carbon Assessments.

Development proposals are encouraged to follow a 'Retrofit first' approach from the outset of designing the proposal, to fully investigate whether existing buildings can be re-purposed (either wholly or in part) instead of demolishing and rebuilding which has more significant impacts in terms of carbon emissions and waste.

Relevant policy and guidance includes:

Local Plan – policies 112-118 and 123-124

London Plan – objective GG6 and policies G1, G6, SI2-SI5 and SI7

NPPF – paragraphs 8 and 174, and section 14

5. Character areas

Character areas and sub areas

- 5.1. The SPD divides Orpington Town Centre into a series of character areas, as shown on Figure 3. These areas have been derived through consideration of the context of the wider area and represent those parts of the area which are considered to have similar characteristics – these are explained below.
- 5.2. The character areas and sub-areas are not intended to be finite boundaries; they are identified for the purposes of this SPD to set out relevant guidance applicable to each area. They have been drawn with deliberately 'soft' edges reflecting the fact that boundaries between character areas are fluid rather than 'fixed'. These areas are not self-contained in terms of the impacts of development; proposals in one area can impact on another area, or areas.

Figure 3: Orpington character areas and sub-areas



Character Areas and Sub Character Areas

- Orpington North
- Orpington East
- Orpington West
- Orpington Station



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Orpington East character area

Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre

5.3. An area entirely of mid-late 20th century town centre development, originally master-planned in the post-war period but subsequently reworked in later years. Includes the Walnuts shopping centre (part of the original masterplan), leisure centre, college and a key public space, the Market Square. The development fills a former void between the High Street and eastern suburbs.

Key characteristics:

- Land use – mix of uses including retail, leisure, education and social infrastructure uses
- Prevailing building height – varied heights across the sub-area; two to three storeys on the High Street frontage, range of three to eleven storey buildings fronting Market Square; and two to four storeys on Lych Gate Road
- Development potential – high

Eastern Edge

5.4. Backland areas, largely undeveloped or underdeveloped, between the High Street and eastern suburbs, and to the south of the post-war development at the Walnuts.

Key characteristics:

- Land use – mix of backland commercial (retail and leisure) areas and residential
- Prevailing building height – two to three storeys
- Development potential – medium

Orpington North character area

The Village

5.5. This original and historic centre of Orpington, including the oldest and most significant historic buildings. Closely aligns with the designated Conservation Area and includes a northern stretch of the High Street which feels notably more intimate in scale and character than the later southern extension.

Key characteristics:

- Land use – predominantly residential with some commercial uses on High Street, significant part of the area covered by Priory Gardens
- Prevailing building height – two to three storeys
- Development potential – low

Orpington West character area

Orpington High Street

5.6. The stretch of late 19th and early 20th commercial High Street as it stretched south towards Orpington station, also including some backland sites which front primarily onto the High Street.

Key characteristics:

- Land use – retail, leisure, cultural and office uses
- Prevailing building height – two to three storeys
- Development potential – medium

Western Edge

5.7. 'One street back' from the High Street and to the west of it, includes significant areas of office use.

Key characteristics:

- Land use – office uses and backland commercial areas
- Prevailing building height – three to five storeys
- Development potential – low to medium

Orpington Station & York Rise

5.8. This area is centred around the station and is made up of an area between the railway and the established suburb of Crofton. Due to its location the station currently feels slightly detached from the town centre but should not be conceived of in design terms as being a separate or unrelated entity.

Key characteristics:

- Land use – Orpington Station is predominant land use
- Prevailing building height – two storeys
- Development potential – medium

General guidance for character areas

- 5.9. Further to the guidance for each character area – set out in the following sections of the SPD – there is general guidance which applies across all of the character areas.

Heritage and conservation

- 5.10. The historic environment in Orpington adds significantly to the character and distinctiveness of the area. It is an integral part of achieving sustainable development in the area.
- 5.11. Orpington has a number of heritage assets, including the designated Orpington Priory Conservation Area, several statutory listed buildings, locally listed buildings, archaeological priority areas and a Scheduled Monument. The Broomhill Conservation Area is in close proximity to the town centre.

SPD guidance note 9

Development proposals must clearly set out any positive and/or adverse impacts on heritage assets. A Heritage Statement will be required in certain circumstances, as set out in the Council's validation requirements; all applications are encouraged to submit a Heritage Statement where the proposed development is in close proximity to a heritage asset. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.

Relevant policy and guidance includes:

Local Plan – policies 38-43 and 45-46

London Plan – objectives GG1 and GG2, and policies HC1 and HC3

NPPF – section 16

Density

- 5.12. All development proposals should follow a 'design-led' approach in order to establish appropriate density and site capacity, with a focus on context and character, in accordance with the London Plan.
- 5.13. Establishing appropriate densities for sites in Orpington should result from a creative, design-led approach which responds to the particular characteristics of the site, its surroundings and the needs of future residents, rather than applying general density standards.

SPD guidance note 10

Development proposals should seek to optimise site capacity ensuring that development is of the most appropriate form and land use for the site, responding to context and capacity for growth, with a focus on quality of place over quantum of development.

Relevant policy and guidance includes:

Local Plan – policies 4 and 37

London Plan – objectives GG1, GG2 and GG3, and policies D3 and D4

NPPF – sections 11 and 12

Tall buildings

- 5.14. Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline. As set out in the London Plan, this may vary in different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 5.15. Well-located and well-designed tall buildings can provide important urban landmarks and much needed homes at increased densities. They can also facilitate wider regeneration benefits. However, due to their scale and prominence, tall buildings have the potential to significantly alter local character and impact on the setting of heritage assets and Conservation Areas, and impact negatively on local environmental conditions and amenity (micro-climate effects).
- 5.16. The existing prevailing heights in an area are particularly important in determining suitable heights for new development proposals. It is essential that proposals for tall buildings respond appropriately in terms of their height, scale and massing – to both neighbouring buildings and the wider context of the town centre and the Cray Valley beyond. Guidance on building heights which the Council considers to be suitable is provided in relation to specific character areas (where appropriate).
- 5.17. In addition to location, architectural design quality and demonstration of wider benefits, a detailed justification for all tall building proposals will be required; this may include townscape contribution – providing visual emphasis, marking thresholds or land use.
- 5.18. Tall buildings should be grounded in their context, they require articulation and a clear narrative informed by local character and identity which should be reflected within the architecture, materiality and detailing – particularly those which form part of an established built-form frontage, as opposed to stand-alone buildings which may, where appropriate, convey a different identity.

SPD guidance note 11

Development proposals for tall buildings must provide detailed justification relating to their visual, functional, environmental and cumulative impact, in line with Policy D9 of the London Plan. Proposals will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area.

Tall buildings will need to be of the highest architectural design quality and be appropriate to their local location and historic context, including taking account of 'Views of Local Importance'; east over Kent from Crofton Road, Orpington, and from Chelsfield Green looking North towards the Cray Valley.

Relevant policy and guidance includes:

Local Plan – policies 37, 42, 47 and 48

London Plan – objectives GG1, GG2 and GG3, and policies D2, D3, D4, D9 and D12

NPPF – sections 12 and 16

Transport and connectivity

5.19. Figure 4 sets out a number of key connections and potential new connections. Development proposals should have regard to both existing and emerging connections and movement patterns from the outset. Development proposals should seek to enhance these connections to improve movement and connectivity within and across Orpington Town Centre.

Figure 4: Orpington key connections and potential connections²¹



²¹ Please note that the key connectivity improvements shown on Figure 4 are indicative not literal; they set out the broad locations/directions where connectivity improvements may be sought as part of any development proposals that may come forward.

- 5.20. Pedestrian and cycle movement is impacted by parked cars and vehicular movement in the High Street. There have been a number of recent improvements on the High Street which have enhanced the area for pedestrians and cyclists.
- 5.21. At a wider scale, the London Cycle Network Route 22 connects Orpington with Petts Wood and on to Bromley Town Centre. Route 22 runs away from Orpington High Street via the steep incline of Knoll Rise to meet Lynwood Grove. Additionally, a number of improvements have been made to the cycling facilities on the A224 (Cray Avenue / Court Road) in recent years with the introduction of a segregated off-road path; however, the A224 junction with Orpington High Street (A223) and the northern end of the High Street remains a challenging junction for pedestrians and cyclists.
- 5.22. Orpington is very well connected by bus, being served by 20 bus routes (including a night bus route) to other locations in Bromley and areas beyond the borough (including central London). Rail links are also excellent, with frequent and fast services into central London and to parts of Kent.
- 5.23. Connections between the town centre and the surrounding suburbs are fragmentary and potentially confusing, especially in relation to the Knoll Area of Special Residential Character (ASRC). There is potential to improve pedestrian permeability (including to the town centre and station) whilst preserving its valued character. To the west of Orpington, a cycling and walking improvement scheme running along the A232 Crofton Road towards Orpington has recently been completed but ends at Orpington Station.
- 5.24. The accessibility of the station (PTAL analysis) offers potential for development and enhanced connectivity with the High Street

SPD guidance note 12

Development proposals should link with existing pedestrian and cycling key routes and should seek to improve these routes or create new routes where appropriate (particularly major developments). Routes connecting with public transport, particularly those through to Orpington Station and the surrounding suburbs, will be a priority. Routes which connect to and link local public open spaces should also be prioritised.

Public realm schemes which improve pedestrian and cycle infrastructure and access to public transport would be consistent with local, regional and national planning policy; the delivery of any future schemes would be a separate decision for the Council, subject to funding and consultation.

Relevant policy and guidance includes:

Local Plan – policies 31 and 32

London Plan – objective GG2 and policies T1 and T2

NPPF – paragraphs 92 and 104

- 5.25. The development of the town has seen a series of awkward, underutilised spaces to the rear of the High Street, between the town centre and the wider suburbs. Some have been filled but do not necessarily give an enhanced sense of place. There are opportunities to increase the permeability and the richness of experience to areas of the town centre beyond the High

Street by providing and /or enhancing streets, yards and alleys across the town, ‘one street back’ from the High Street, intensifying uses within the town centre in a way that increases permeability and links into the wider green network. Such spaces could also have benefits in terms of the vitality and viability of the town centre, providing complementary spaces for shops on the High Street, for example outdoor leisure spaces.

SPD guidance note 13

Development proposals should seek to enhance the attractiveness and vibrancy of areas to the rear of the High Street, through improvements to the permeability and legibility of the town centre, strengthening / creating a green network through the town centre and potentially spaces providing variety and interest for new and existing local businesses.

Relevant policy and guidance includes:

Local Plan – policies 17, 91, 92, 97 and 98

London Plan – objectives GG2 and GG5, and policies SD6-SD9, E1, E9, E10 and HC5-HC7

NPPF – sections 6 and 7

Green infrastructure and biodiversity

- 5.26. Orpington offers a range of opportunities to develop an environment-focused approach for the town centre, maximising the potential offered by green spaces and routes within and beyond the town centre. This links with other opportunities, notably the opportunities to enhance connectivity and active travel.
- 5.27. The town centre sits in the centre of the Cray Valley and the character of this sequence of landscapes should inform development to enhance or create better connections to strengthen the green corridor along the Cray Valley.
- 5.28. The environmental quality, public use and connectedness of the Cray Valley network of landscapes offers the opportunity to create a connected sequence of spaces, which could facilitate a range of public uses, be ecologically rich and contribute to public health and wellbeing.
- 5.29. The Bromley Biodiversity Plan (BBP) 2021-2026²², seeks to promote coordinated action for biodiversity at the local level. The BBP is a relevant material consideration for planning applications in relation to biodiversity issues. The BBP details the priority habitats and species in the borough and should be read in conjunction with idverde Bromley Biodiversity Action Plan (iBBAP) written by idverde²³, who manage Bromley owned land. The iBBAP provides detailed actions and targets for Bromley owned land but these are also generally applicable to habitats under different ownership.
- 5.30. As highlighted above, Orpington is designated both as an ‘Area of Local Park Deficiency’ and an ‘Area of Deficiency in Access to Nature’. The creation of new green infrastructure, such as

²² Available from: <https://www.bromley.gov.uk/planning-policy/biodiversity-bromley>

²³ Available from: <https://www.bromleyparks.co.uk/wp-content/uploads/2017/11/Bromley-Biodiversity-Action-Plan-Public-Version-Branded.pdf>

green spaces (including pocket parks) which provide linked habitats and green corridors, provides opportunities for biodiversity to flourish through linkages between local Sites of Interest for Nature Conservation (SINCs).

SPD guidance note 14

Applicants should demonstrate how their development proposals enhance the ecological richness of the local environment using the Government's published Biodiversity Metric, to achieve a biodiversity net gain in line with relevant legislation and policy. Proposals near to existing green and open spaces should maximise opportunities to enhance biodiversity and create a joined-up sequence of functional, publicly accessible green spaces through the town centre, reinforcing connections to the wider Cray Valley and Green Belt landscapes.

Relevant policy and guidance includes:

Local Plan – policies 17b, 37c, 59, 71, 72, 73, 74, 78, 79

London Plan – objective GG3 and policies G1, G4, G5 and G6

NPPF – paragraphs 130, 131, 174 and 180d

Sustainability

- 5.31. Development Plan policy, particularly policy set out in the London Plan, is underpinned by the need to deliver sustainable design. Good Growth objective 6 of the London Plan notes the need to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050. To achieve this, the objective notes the need to ensure that buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.
- 5.32. In line with the 'Sustainable' design principle, new development should minimise its energy use and maximise carbon reduction, both in terms of its design and materials and its future use. London Plan policy SI2- and accompanying GLA guidance requires major development proposals to undertake an energy assessment and develop a carbon reduction strategy, aiming to be "zero carbon". In accordance with the policy, reductions should be made on site where possible, although there is provision for off-site mitigation and/ or a carbon off-setting payment where agreed. Smaller scale developments should also aim to reduce their carbon footprint and are strongly encouraged to demonstrate how they have been designed to accord with the energy hierarchy.
- 5.33. Development proposals in Orpington should strive to provide exemplary sustainable design in line with Development Plan policy; this is particularly the case for larger schemes such as the expected development proposal at the Walnuts Shopping Centre, which, due to their scale, offer the opportunity to deliver significant sustainability benefits.
- 5.34. The potential for overheating should be considered in all developments, in line with London Plan policy SI3. The cooling hierarchy clarifies that the design of buildings is crucial to minimising overheating, and that air conditioning (active cooling) should be a last resort. As noted above, green infrastructure should be investigated for its multiple benefits to the town

centre, as set out above, including increasing shading and improving comfort for residents and visitors.

- 5.35. Orpington Town Centre is within an Air Quality Management Area (AQMA), which are areas declared by the Borough in response to modelled or measured existing exceedances of legal air quality limits. The London Plan policy SI1 sets out specific requirements to tackle poor air quality, including a requirement for major development proposals to submit an Air Quality Assessment. The Bromley Air Quality Action Plan 2020-2025²⁴ outlines the actions the Council is taking to improve air quality in the borough.

SPD guidance note 15

The London Plan sustainable infrastructure policies must be addressed in full, with provision of detailed and timely information to enable assessment against the relevant policy criteria.

The energy hierarchy is the starting point for future-proofing development in Orpington Town Centre, increasing energy efficiency and minimising carbon emissions. The same principles apply to refurbishments of existing buildings as to new buildings.

Development proposals must be designed in accordance with the energy hierarchy, prioritising design solutions which minimise the energy demand of the proposal in line with the hierarchy priorities.

Opportunities for retrofitting of existing buildings should be robustly investigated ahead of demolition and rebuild; this could reduce the need for new materials, as long as the resulting development is fit for purpose, efficient and comfortable for users. Otherwise, the replacement of a building should reuse demolition materials on site and take advantage of the potential for a more energy efficient construction and design.

The heat and power needed for users should be provided as efficiently as possible and through low or zero carbon technologies. Where feasible, new developments should link to any local heat and energy networks, or plan for connection in the future.

The comfort of users should be a key part of designing development proposals, minimising the need for heating or powered cooling in particular.

Relevant policy and guidance includes:

Local Plan – policies 112-117 and 123-124

London Plan – objective GG6 and policies SI2-SI5, SI7 and T7

NPPF – paragraph 8 and section 14

Renewal Area

- 5.36. Orpington is within the Cray Valley Renewal Area. Proposals in this area are expected to maximise opportunities to support the economy, and the health and wellbeing of the

²⁴ Available from: <https://www.bromley.gov.uk/downloads/download/314/air-quality-action-plan>

community; to protect and enhance the green wildlife corridor along the river valley; and to support Orpington Town Centre in its role, as a Major Town Centre. The contribution any individual application can make will be relative to its scale.

SPD guidance note 16

Development proposals will be expected to demonstrate that opportunities to address the Renewal Area policies – to deliver demonstrable economic, social and environmental benefits - have been fully explored.

Relevant policy and guidance includes:

Local Plan – policies 13, 14 and 17

London Plan – objectives GG1-GG6, and policy SD10

NPPF – sections 5-8

Use Class E and permitted development rights

- 5.37. The introduction of Use Class E has the potential for some positive benefits for Orpington, by increasing flexibility to allow for the introduction of a wider range of commercial uses, but conversely it could undermine planning policy and local strategies for the town centre, where particular types of uses are prioritised.
- 5.38. The UCO changes are a blunt tool which do not allow consideration of the potential adverse impacts of the new use, particularly in those predominantly retail areas which continue to perform strongly. Unrestricted change of use in Orpington Town Centre could ultimately have adverse impacts on the vitality and viability of the area, for example, by reducing the provision of shops which provide essential services.
- 5.39. Permitted Development rights also have the potential to undermine Development Plan policies, with potentially significant adverse impacts on local amenity resulting from the loss of designated retail and employment areas such as the Knoll Rise office cluster. In particular, Part 3, Class MA PD rights (which allow Class E uses to convert to residential use) could fundamentally alter the face of the town centre, with the likely loss of a significant amount of economic and retail floorspace. This would undermine the ability of the Council to deliver on economic growth aspirations set out in the adopted Local Plan and other strategies.
- 5.40. The Council intends to utilise planning conditions to restrict permitted development rights and changes within Use Class E, to ensure that such changes will require planning permission and can therefore be assessed against relevant Development Plan policy.

SPD guidance note 17

Where considered necessary to protect the vitality and viability of the town centre and assist with the implementation of Development Plan policies, planning conditions will be used to remove the provisions of Use Class E and to remove specific permitted development rights.

A planning condition may be imposed on new development proposals involving Class E uses to restrict the operation of Section 55(2)(f) of the Town and Country Planning Act 1990 and require that the premises subject to the application shall only be used for a specific use(s) within Class E, therefore limiting the ability to change to other Class E uses without planning permission.

Planning conditions may be imposed on new development proposals to remove permitted development rights, particularly Part 3, Class MA permitted development rights which allow Class E uses to change to residential use.

Relevant policy and guidance includes:

Local Plan – policies 13, 14, 17, 20, 85, 91-92 and 98-99

London Plan – objectives GG1-GG3 and GG5, and policies SD6-SD10, E1, E9 and HC5-HC7

NPPF – sections 6-8

6. Orpington East

Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre

- 6.1. This sub-area consists entirely of mid-late 20th Century town centre development, originally master-planned in the post-war period but subsequently reworked in later years. It includes the Walnuts Shopping Centre, leisure centre, Orpington College, Saxon Day Centre and a key public space, the Market Square. This post war shopping centre occupies a prominent central space within the town centre, between the High Street and eastern suburbs, but it currently forms a significant barrier to east-west and north-south permeability, both in terms of the physical barrier of the existing built form and the level change across the area.

Development Opportunities

- 6.2. There are several development opportunities within this character sub area, all of which are 'windfall' sites that have come forward following the adoption of the Local Plan.

The Walnuts Shopping Centre and Market Square

- 6.3. The Walnuts Shopping Centre site offers the opportunity for development which optimises the site (by adopting a design-led approach), delivering a significant quantum of new housing and commercial development, alongside public realm enhancements and provision of significant green space / play space / street greening.
- 6.4. Any development proposal which comes forward on this site should accord with the following key parameters:
- Taking into account the local context, which is characterised by low-rise development, the Council considers that higher density development, predominantly 3 to 9 storeys, would be appropriate in this location. Heights should graduate from 3-4 storeys at the edges of the site, to respond sensitively to the existing low-rise scale of the predominantly 2 storey residential properties to the north, east, and south.
 - The higher end of the 3-9 storey threshold should be located towards the centre of the site in order to mediate between the surrounding contrasting scales. Subject to detailed justification which addresses relevant policy requirements, a single taller element with a maximum height of up to 15 storeys, taking reference from the height of the nearby Orpington College tower, may be suitable. Any taller element should be located centrally within the site to minimise the impact on the surrounding low-rise context. The Council considers an elegant slender building to be more appropriate than a larger slab block, in order to reduce the appearance of bulk and to create a more distinctive and positive contribution to the skyline.
 - There is an opportunity for new development to act as a visual marker providing a positive landmark at the heart of Orpington Town Centre and should be designed to assist with wayfinding as part of a coherent streetscape, whilst protecting or enhancing key views as set out in the Local Plan.
 - In accordance with Local Plan and London Plan requirements, particularly Local Plan policy 47 and London Plan policy D9, tall and large buildings will need to be of the highest architectural design quality and materials and be appropriate to their local location and historic context, including strategic views. New development should be integrated with the established street network of the wider town centre, redesigning the existing covered

shopping area as pedestrian streets linking the High Street to Lych Gate Road (east-west) and improving the environmental quality and security of north-south links, particularly links to Priory Gardens to the north and links to the south which could improve access to the train station. These key routes should be reinforced with clear wayfinding cues.

- High quality public realm will be a key requirement, improving key connections and providing a network of green, playable spaces fronted by active uses.
- London Plan policy S6 requires large-scale developments (i.e. developments with a total floorspace of more than 15,000sqm) that are open to the public to provide new public toilets. Any large-scale development at the Walnuts Shopping Centre site should address this requirement.
- Development proposals should seek to provide a range of commercial unit sizes to ensure that space can be occupied by a range of different operators. This could include larger retail space that can be sub-divided. Other commercial space including different typologies of office space may be suitable.
- Enhanced greening and landscaping is sought, to create a strong linear park/green space network following the general route of the River Cray and its valley, including enhanced public realm and environmental connections along the rear of Bruce Grove to Bark Hart Road and Priory Gardens, and south to Homefield Rise and along Gravel Pit Way. Vertical greening should be prioritised on key elevations.
- Red and buff brick predominate on the High Street. Development proposals in the area should have regard to these existing materials and conditions, which should be used to inform new development in the area (both new development and redevelopment or retrofitting of buildings).

6.5. Market Square is the civic heart of Orpington, providing an accessible space which plays host to the market and various events. Future development should ensure the retention of the existing uses and avoid interventions which may affect the future viability or operation of the market or compromise the event space function. Redevelopment of the square offers the potential for significant enhancement to create a more attractive and appealing space in which to gather, socialise, shelter, and dwell, activated by shops, cafes, a new leisure centre, college, and other community facilities.

Leisure centre

- 6.6. As part of any redevelopment of the leisure centre, retention of the leisure centre within the town centre is considered the preferred option, as it forms an important part of the town centre offer and contributes significantly to the vitality and viability of the centre. Any redevelopment of the leisure centre must be consistent with Policy 20 of the Local Plan, which resists reductions in the quality of provision and the loss of facilities without strong justification.
- 6.7. Wherever possible, temporary facilities should be provided in an accessible location during any closure period. Where temporary reprovision is not possible, any closure period should be kept to a minimum.
- 6.8. Other guidance and best practice may be relevant to any proposals for redevelopment of the leisure centre, including guidance produced by Sport England.
- 6.9. London Plan policy D13 (agent of change) is particularly relevant to any redevelopment of the leisure centre. The introduction of residential uses in close proximity to a leisure centre increases the potential for adverse impacts relating to noise and disturbance, which could affect the ongoing function of the leisure centre. The agent of change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development; this means that any

applicant proposing new residential uses in close proximity will need to provide robust evidence to demonstrate that there will be no impacts.

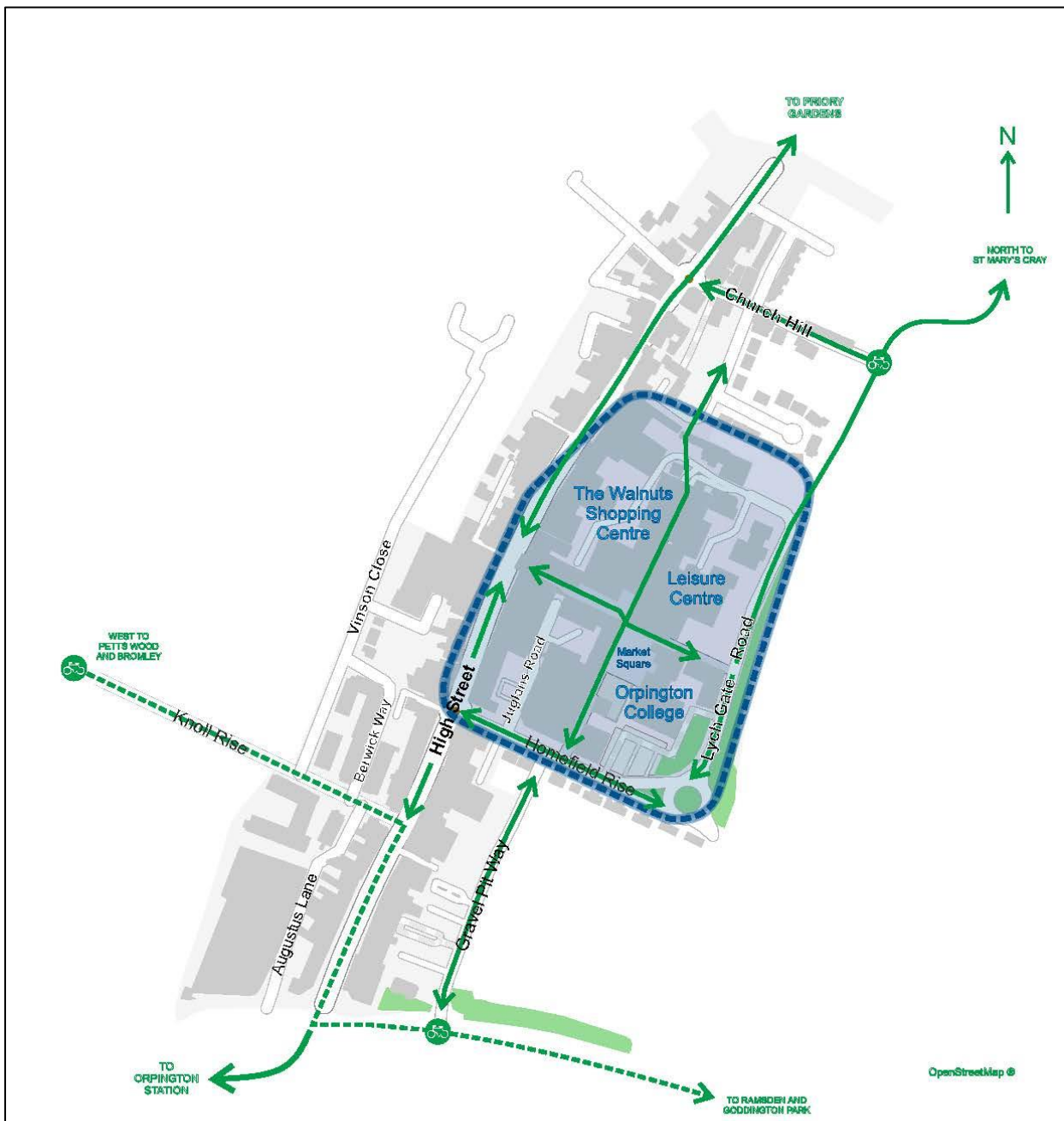
Orpington College

- 6.10. The Orpington Campus of London South East Colleges is located in Orpington Town Centre, with a frontage onto Market Square. The presence of the campus at the heart of the town centre attracts students from across the borough and beyond, adding to the diversity of uses in the town centre, enhancing vitality and viability and providing important educational opportunities. The college site offers a development opportunity to enhance college provision, deliver green infrastructure and improved public realm and potentially additional mixed-use development including housing and commercial uses. Local Plan policies 20 and 27 will be a key consideration where any development comes forward; the policy aims to ensure that social infrastructure provision in the borough is protected.
- 6.11. The site is intrinsically linked to the adjoining Walnuts Shopping Centre site with the existing building fronting directly onto Market Square. It is therefore important that opportunities to improve legibility and permeability across the site are optimised and the cumulative impact of height, scale and massing is considered as part of any future redevelopment proposals.
- 6.12. The existing college buildings, including the tower, lend themselves to a retrofit-first approach, which would ensure that impacts from existing embodied carbon are significantly reduced, compared to a proposal involving demolition of the existing buildings.
- 6.13. Orpington College is the tallest building in Orpington and is prominent from several locations across the town, dominating views and acting as a visual landmark for the college, Market Square and the Walnuts Shopping Centre. The Council considers that a maximum height of 12 storeys is appropriate for any redevelopment of the Orpington College site that does come forward, in order to retain an appropriate relationship with both the existing and emerging context. This includes the recent Brunswick House development to the west which has a maximum height of 9 storey at its highest point; and the modest scale of the existing residential areas to the south and to the east.
- 6.14. The height and massing of any development proposals must provide detailed justification addressing relevant policy requirements and will be expected to make a positive contribution to the immediate setting and wider townscape skyline. Consideration should also be given to the cumulative impact of proposals on the College site with proposals for the Walnuts Shopping Centre site. The Council will encourage a collaborative joined-up approach in order to optimise the development potential of both sites.




Saxon day centre

- 6.15. Where development proposals involve the Saxon day centre, Local Plan Policy 20 will be a key consideration, meaning that reductions in the quality of provision or the loss of facilities would require strong justification. Any redevelopment of the day centre should ensure improved quality provision and should remain equally as accessible for its users. Wherever possible, temporary facilities should be provided in an accessible location during any closure period. Where temporary reprovision is not possible, any closure period should be kept to a minimum.

Figure 5: Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre sub-area



Market Square, Orpington College & the Walnuts Shopping Centre and Leisure Centre Sub Character Area

-  Sub character area
-  Cycle route
-  Key connection



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Eastern Edge

- 6.16. This sub-area sits to the south of the Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area. It consists of commercial back-land areas along Gravel Pit Way, to the rear of the High Street and within the defined Local Plan Town Centre boundary. These are unattractive, largely undeveloped or underdeveloped areas including open area surface car parking between the High Street and eastern suburbs.
- 6.17. The Eastern Edge also includes a Local Plan site allocation - Site 11, Homefield Rise, Orpington - which is immediately adjacent to, but outside the defined town centre boundary. Local Plan policy 1 and appendix 10.2 identify the site for around 100 residential units (87 units net, deducting the existing 13 dwellings on the site). Two phases of redevelopment have now been permitted²⁵, which will provide a total of 63 dwellings.

Development Opportunities

- 6.18. This sub-area has a transition in height between the existing taller, five to six storey elements at the southern edge of the Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area (including the car park and Sapphire House) and the lower rise, traditional two storey suburban residential development of Lancing Road (the gardens of which back onto Gravel Pit Way). This will be a key consideration for any development that does come forward.
- 6.19. The sub-area offers a key opportunity to improve permeability across the town centre, particularly with regard to improving links through the Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area to Priory Gardens to the north and links to the south which could improve access to the train station. These key routes should be reinforced with clear wayfinding cues.
- 6.20. High quality public realm will be a key requirement, improving key connections and providing a network of green, playable spaces fronted by active uses.

Site 11

- 6.21. Site 11 is opposite the five to six-storey Sapphire House but backs onto smaller scale residential properties on Lancing Road. The redevelopment of this site provides an opportunity to mediate between these contrasting scales to create a more subtle/stepped transition between the urban edge and the suburban residential fringe.
- 6.22. Any future redevelopment should provide a good amount of separation between existing properties in Lancing Road to safeguard amenity and provide an active frontage to Homefield Rise, with prominent entrances and a green buffer to soften the edge and enhance the street scene.
- 6.23. Future development proposals should respond appropriately to the corner junctions with Gravel Pit Way and Mortimer Road; there is an opportunity to bookend a linear block layout to create a strong east-west visual connection/relationship between buildings.
- 6.24. Due consideration should be given to scale and massing which should respond to the topography of the site; given the linear nature of the site, it will be important to create visual breaks between blocks to avoid the perception of a continuous wall of development fronting

²⁵ Planning permission reference: 20/02697/FULL1

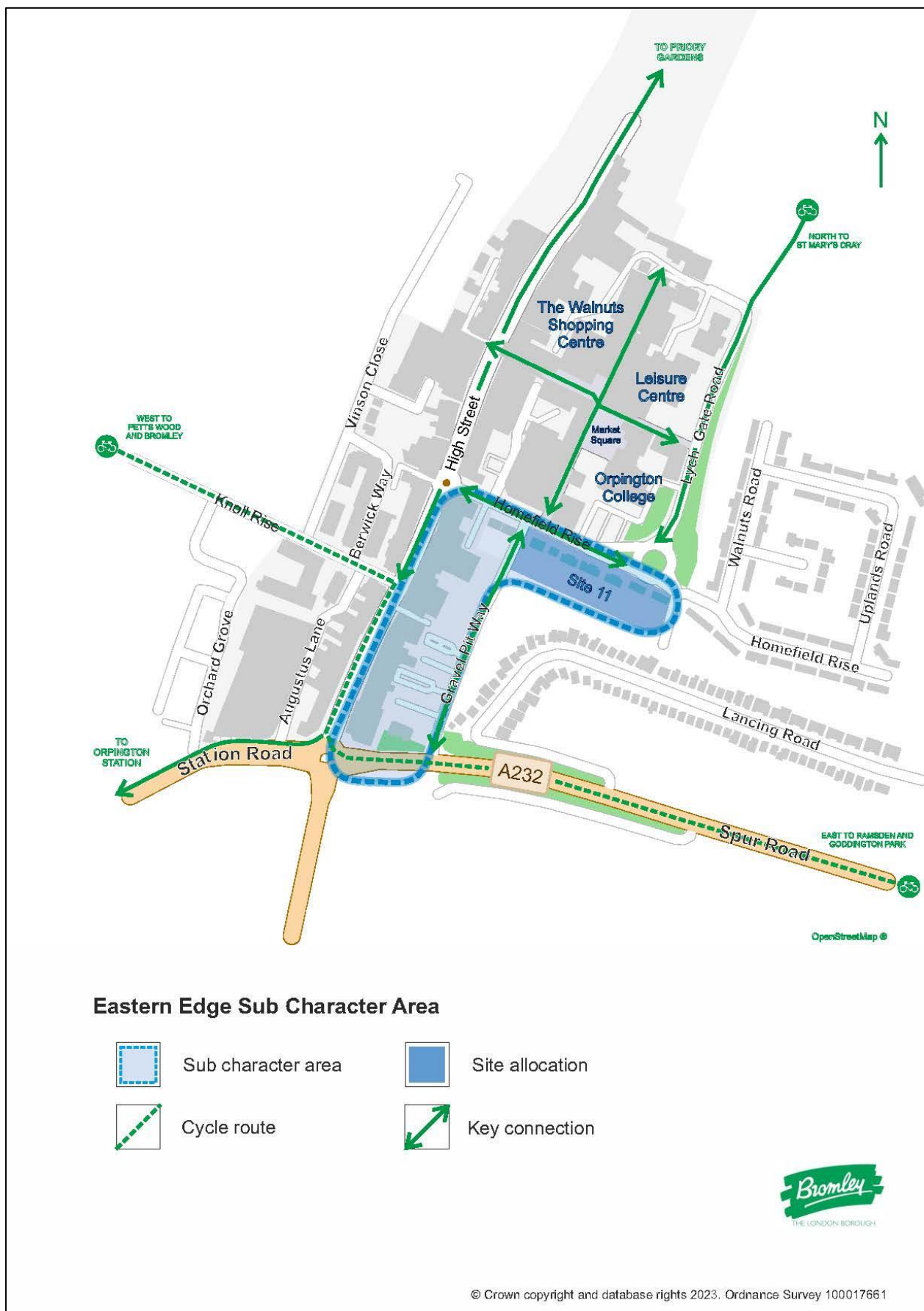
Homefield Rise. A maximum height of three to four storeys is considered acceptable subject to appropriate scale and massing and detailed design considerations.

- 6.25. The architectural language should respond to the contemporary style of emerging developments nearby but should also reference the character and materiality of Orpington Town Centre and the suburban residential fringe.
- 6.26. Any development proposal which comes forward on this site should also accord with the following key parameters:
- Contribute to an improved public realm and improved permeability (particularly north-south across Homefield Rise through Market Square and along Lych Gate Road).
 - Utilise urban greening which contributes to a green link running through the town centre.

Gravel Pit Way

- 6.27. There are a number of parking and servicing yards to the rear of the High Street on Gravel Pit Way. These areas could provide opportunities to optimise the Eastern Edge, increasing permeability through the town centre and utilising areas of the town centre beyond the High Street to create new areas of activity and help facilitate improved vitality and viability on the High Street itself.
- 6.28. This could include measures such as pocket parks, improved greening and outdoor seating, which offer a place to dwell and relax for people visiting the town centre.
- 6.29. There may be potential for redevelopment of the spaces to the rear of Gravel Pit Way to provide additional commercial space (including a range of typologies of office and workspace) to support and enhance the commercial function of the High Street; this could include some residential uses as part of a commercial-led mixed-use development. Any development proposal which comes forward on these spaces should accord with the following key parameters:
- Ensure that any development fully considers and mitigates impacts on properties on Lancing Road. The height of any development should be set back from Gravel Pit Way, potentially utilising green features and public realm as a buffer between the development and the rear of the Lancing Road properties. A new street frontage along Gravel Pit Way would activate this space and transform the area into a town centre destination.
 - Respond appropriately to the local context (including the low-rise character of the High Street and properties on Lancing Road) and relevant reference heights. The Council considers that this site could accommodate a medium-density development of 2-3 storeys. This could be in the form of linear blocks, with breaks in massing to accommodate public realm, greening and east-west links through to the High Street. Any new links should be functional and usable, planned as an integral part of any development and not included as an afterthought.
 - Contribute to new green public realm linking through to Homefield Rise and further north towards Priory Gardens.
 - Ensure that any adverse impacts that may arise due to the loss of the existing parking and servicing yards are mitigated.

Figure 6: Eastern Edge sub-area



7. Orpington North

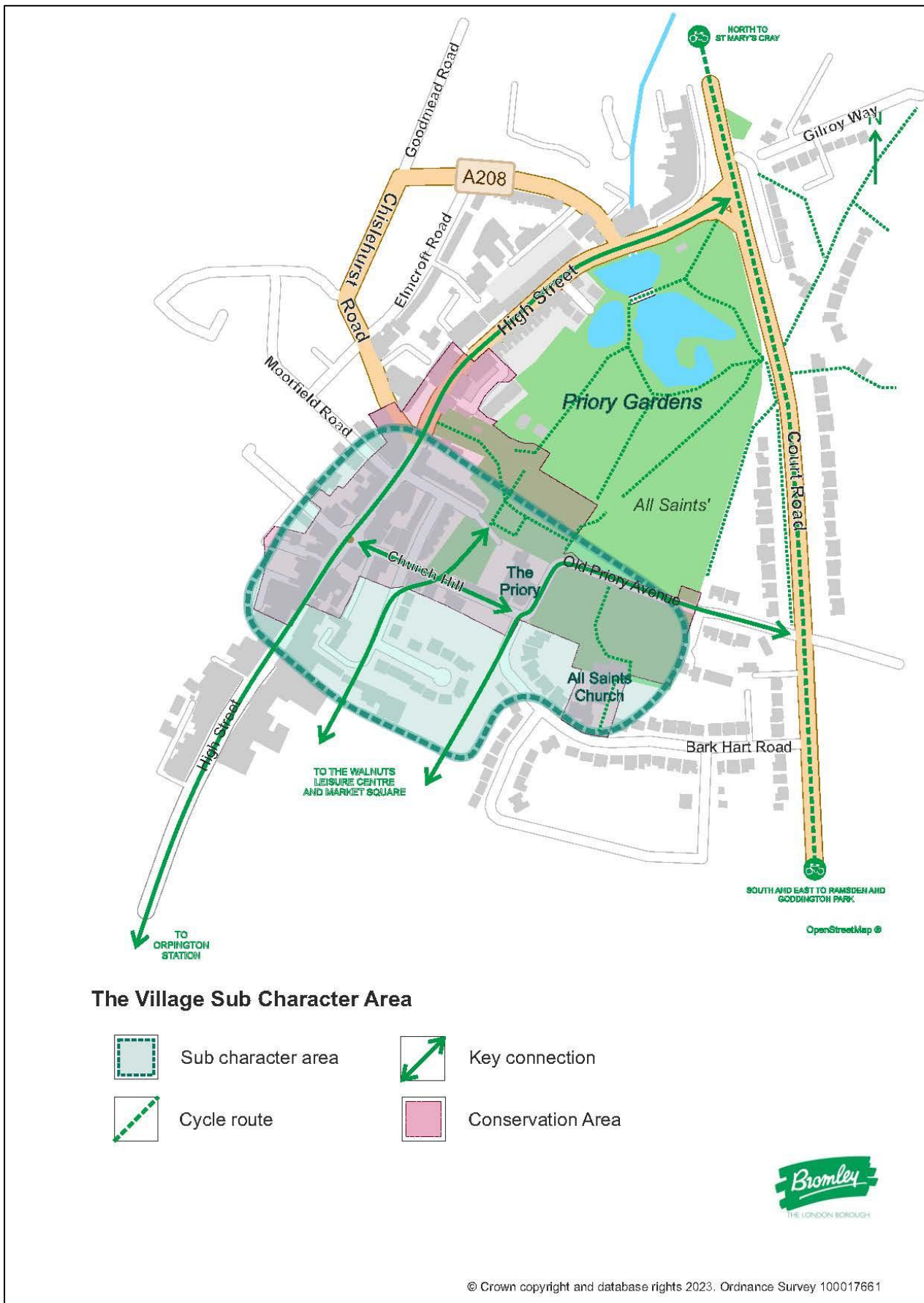
The Village

- 7.1. This sub-area is the original and historic centre of Orpington and includes the centre's oldest and most significant historic buildings. It closely aligns with the designated Orpington Priory Conservation Area and includes a northern stretch of the High Street which feels notably more intimate in scale and character than the southern part of the High Street (which was developed later). The area is not expected to see significant amounts of development, but where proposals do come forward, the Orpington Priory Conservation Area SPG will be a strong material consideration in the determination of planning applications within this sub-area; and also for applications outside the sub-area which may affect its setting or detract from views into or out of the area. Given the heritage constraints and the existing low-rise character, heights of two to three storeys may be acceptable on the High Street part of the sub-area, dependent on the suitability of other elements of the scheme design. Heights of more than two storeys are unlikely to be acceptable in the predominantly residential part of the sub-area.
- 7.2. In terms of acceptable uses, it is expected that any proposals that do come forward would maintain active frontage at ground floor level, for commercial or community uses. On upper floors, residential use may be appropriate where such uses can be accommodated without affecting the operation of High Street commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 7.3. The High Street / Chislehurst Road is a key bus corridor; therefore, any redevelopment should seek to avoid or minimise adverse impacts to bus operations, especially during construction.
- 7.4. The historic and architectural character of the sub-area is a significant asset, which should be consolidated and enhanced. Its picturesque sequence of High Street buildings would benefit from a public realm that prioritises pavement activity and outdoor facilities linked to restaurants, bars or pubs, enhancing pedestrian experience and connectivity, and providing greater accessibility to cultural and heritage assets. Urban greening, particularly new street trees, will be supported, whilst maintaining a clear pedestrian thoroughfare in line with inclusive design principles. New high quality public realm will also benefit the High Street to the south, providing improved access, trip generation and places to dwell.
- 7.5. The Priory and All Saints Church are both statutorily listed and date back to the formation of the original settlement. They both offer the potential for a strong public and civic role in the life of the town and should be more closely integrated with the rest of the town through improved public realm.
- 7.6. Part of Priory Gardens is located within the sub-area; this is the most significant open green space for Orpington residents, businesses and visitors. It is a very important multifunctional asset for the town centre, providing important green space, a place for people to socialise and for children to play, and as a key walking and cycling route along the Cray Valley corridor. Links to and through Priory Gardens should be prioritised as part of development in Orpington Town Centre.
- 7.7. At the northern fringes of Priory Gardens, wayfinding and landscaping can play a role in conveying the wider Cray Valley landscape to users of Priory Gardens, with potential for improved access to the north to link with other green spaces along the Cray Valley corridor.

Improvements to biodiversity should also be sought, reflecting the SINC status of part of Priory Gardens.

- 7.8. The Broomhill Conservation Area lies to the west of the sub-area and town centre. Any development should have regard to the setting of this Conservation Area, and reflect guidance set out in the Broomhill Conservation Area SPG.

Figure 7: The Village sub-area



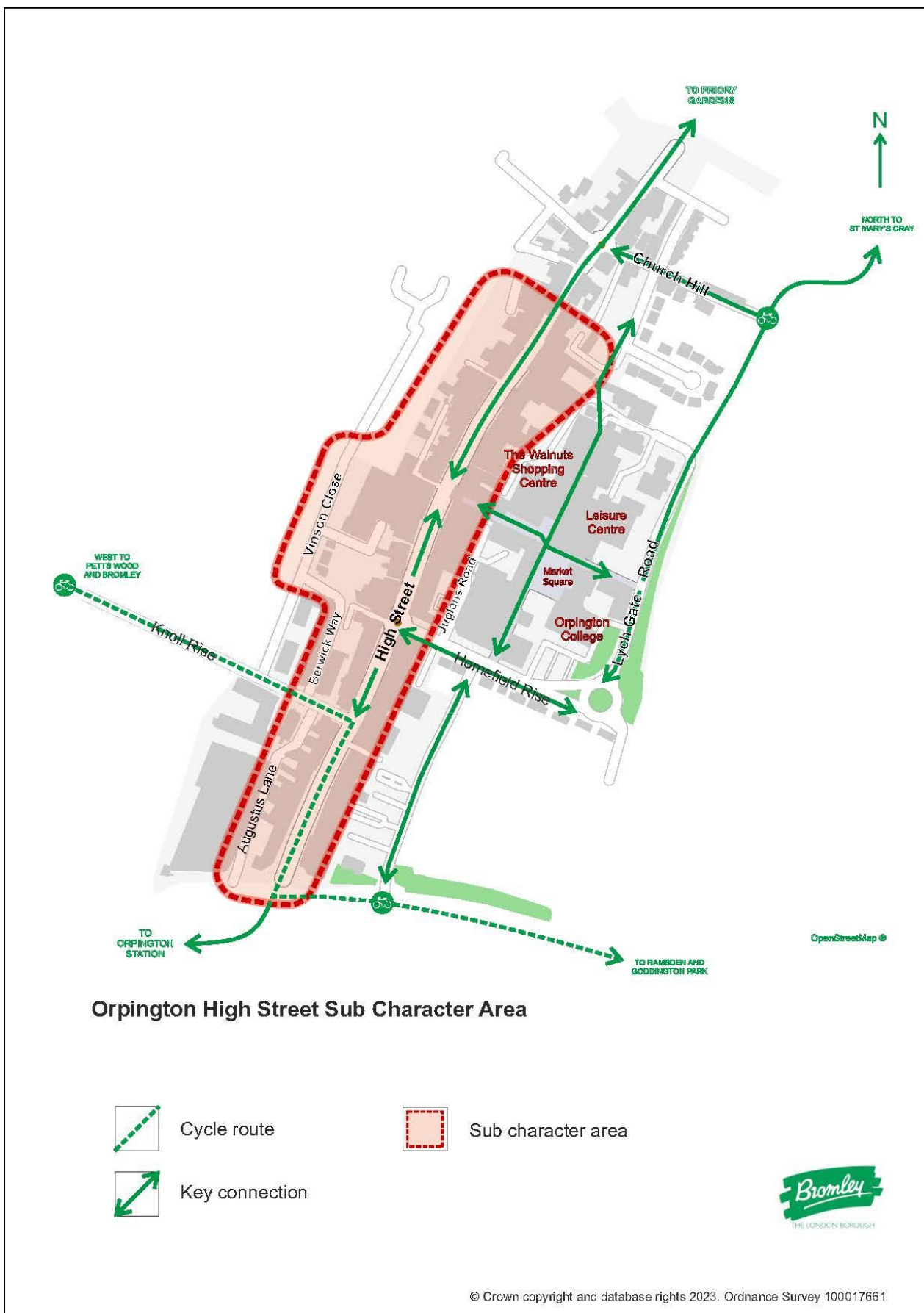
8. Orpington West

Orpington High Street

- 8.1. This sub-area is a long linear commercial High Street, formed as the original settlement began to stretch out toward Orpington station in the late 19th Century and early 20th Century. It also includes some backland sites used as yards or servicing for the High Street.
- 8.2. The High Street should present a lively commercial and cultural space, with its existing offer augmented by new offices and workspaces, and culture and leisure uses. Diversifying the High Street offer is considered important to ensure that the vitality and viability of the High Street is protected and enhanced, and that it remains successful in the future, in the face of huge challenges from the changing nature of shopping and post-Covid. However, the function of the High Street should remain predominantly commercial, particularly at ground floor level. Residential use may be suitable on upper floors, particularly where such uses can be accommodated without affecting the operation of High Street commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 8.3. The public realm should be seen as a series of connected routes and spaces that helps to define the character of Orpington as a place. As the High Street changes, opportunities should be taken to extend new east-west connections across it and into the rear yards and 'back of the High Street' spaces, which can allow for uses, spaces and types of business that are different to those on the High Street. Redevelopment in the Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area offers an opportunity for new public realm and connections linking the High Street with areas to the east through Market Square and onto Lych Gate Road. There are opportunities for improved greening and wayfinding to aid navigation to the north of the High Street toward Priory Gardens and the wider Cray Valley.
- 8.4. The High Street public realm is extremely important to its overall economic, social, and environmental success. High quality, functional, easily navigable public realm helps to support local businesses by encouraging people to visit, creating a more attractive, appealing space in which to 'stop and stay', as opposed to a sterile transient space to quickly move through. The long linear nature of the High Street lends itself to focussed public realm interventions at key junctions (including new east-west routes where these are created) which turn them into places by providing clusters of activity. The public realm should focus on the pedestrian experience, prioritising pedestrians over vehicle movement, it should be user-inspired to deliver innovative, engaging, and inclusive design. Opportunities for urban greening including tree planting should be an integral part of the wider public realm strategy; opportunities to link new and existing green infrastructure should be investigated.
- 8.5. There may be opportunities for small-scale and infill residential and/or commercial development along the High Street and to the rear, including upwards extensions of existing buildings. Where such opportunities do come forward, any increase in height should be modest and reference prevailing heights in the vicinity, which is generally two to three storeys. Developments of a similar height may be acceptable subject to detailed design considerations.

- 8.6. Development proposals should respond sensitively to designated and non-designated heritage assets and should avoid the creation of an abrupt or excessive step change in scale so as not to negatively impact on townscape continuity and character. The human scale feel of the High Street contributes to its character which should be retained and reinforced. The design of small-scale and infill development should reference the prevailing character and materiality evident along the High Street. Extensions of existing buildings should also accord with a retrofit-first approach, by utilising existing buildings rather than demolishing and rebuilding them.
- 8.7. The High Street is a key bus corridor; therefore, any redevelopment should seek to avoid or minimise adverse impacts to bus operations, especially during construction.
- 8.8. The High Street has a strong civic character, with predominant red and buff brick buildings. Development proposals in the area should have regard to these existing materials and conditions, which should be used to inform new development in the area (both new development and redevelopment or retrofitting of buildings).

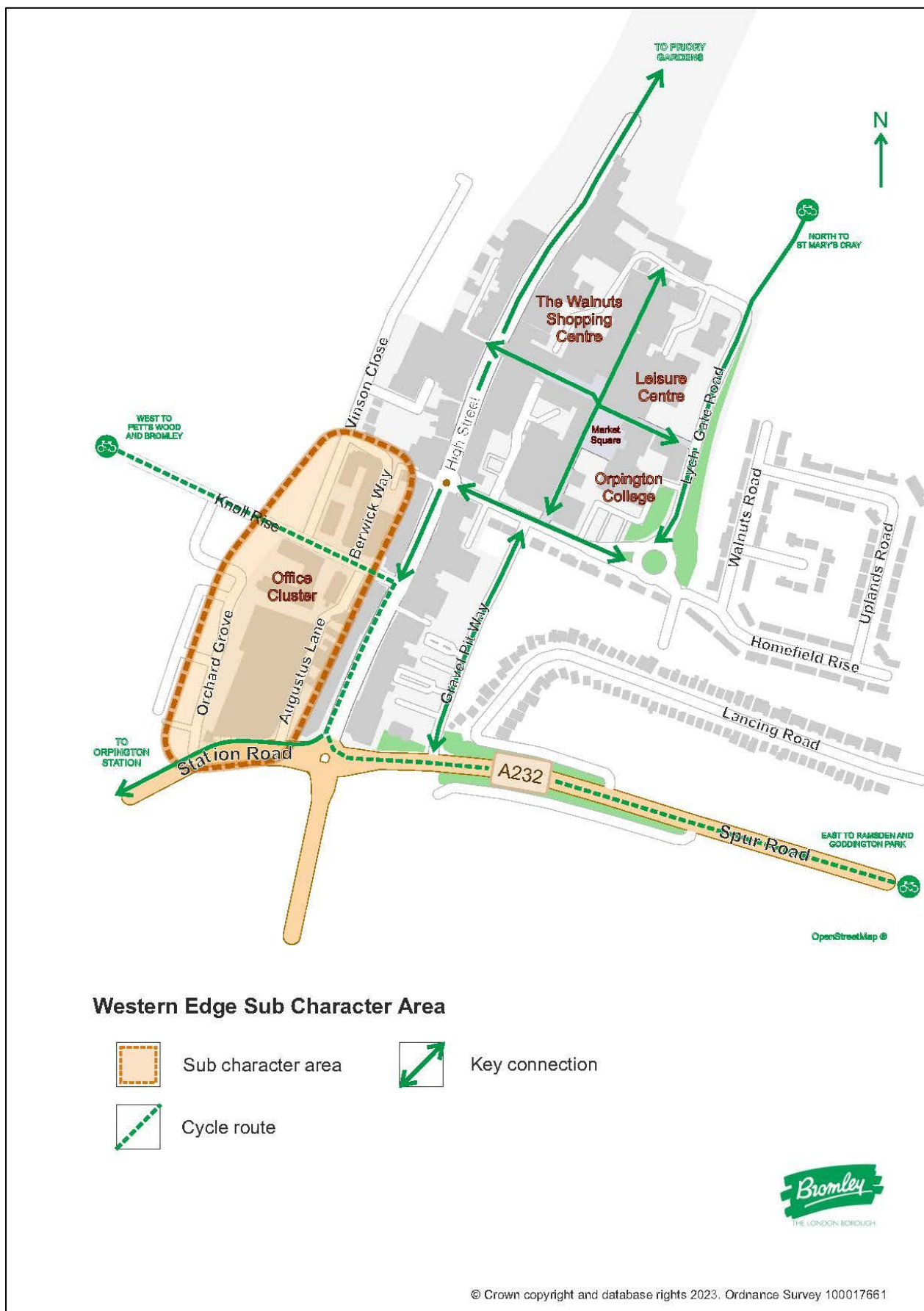
Figure 8: Orpington High Street sub-area



Western Edge

- 8.9. This sub-area consists of commercial back-land areas to the rear of the west side of the High Street, some of which falls within the defined Local Plan Town Centre boundary. It is an area of transition between the commercial, more urban character of the High Street and the suburban character of the Knoll residential area.
- 8.10. The sub-area includes significant areas of office use within the designated Knoll Rise office cluster. The south of the area is dominated by a large mixed-use development including a Tesco supermarket, flats and car park.
- 8.11. Office uses are a primary function of this sub-area. Developments within the Knoll Rise office cluster will be expected to enhance the quality of existing office floorspace and re-provide existing floorspace in line with Local Plan Policy 85. Office typologies not traditionally found on the High Street, such as co-working and sharing spaces, could be suitable in this area, as part of a mix of office typologies.
- 8.12. The prevailing heights in the area are mixed, with several buildings ranging from three to five storeys. Given the proximity to the three storey properties along the High Street, further increases in height above this range would be considered unsuitable. Development proposals of around three storeys may be appropriate, subject to detailed design considerations.
- 8.13. Development proposals should seek to deliver additional and improved connections to the High Street and to the west toward the station and the surrounding residential areas. New routes to the station should include improved wayfinding, green features and facilitate easier access via walking and cycling.
- 8.14. Improved public realm within the sub-area could help to support new and existing office and High Street uses, providing space for people working in or visiting the town centre to dwell and relax. This could include measures such as pocket parks, urban greening and outdoor seating. New or enhanced public realm can function as a wayfinding tool and should be co-ordinated with any improved connections through the sub-area, particularly routes to Orpington Station.

Figure 9: Western Edge sub-area

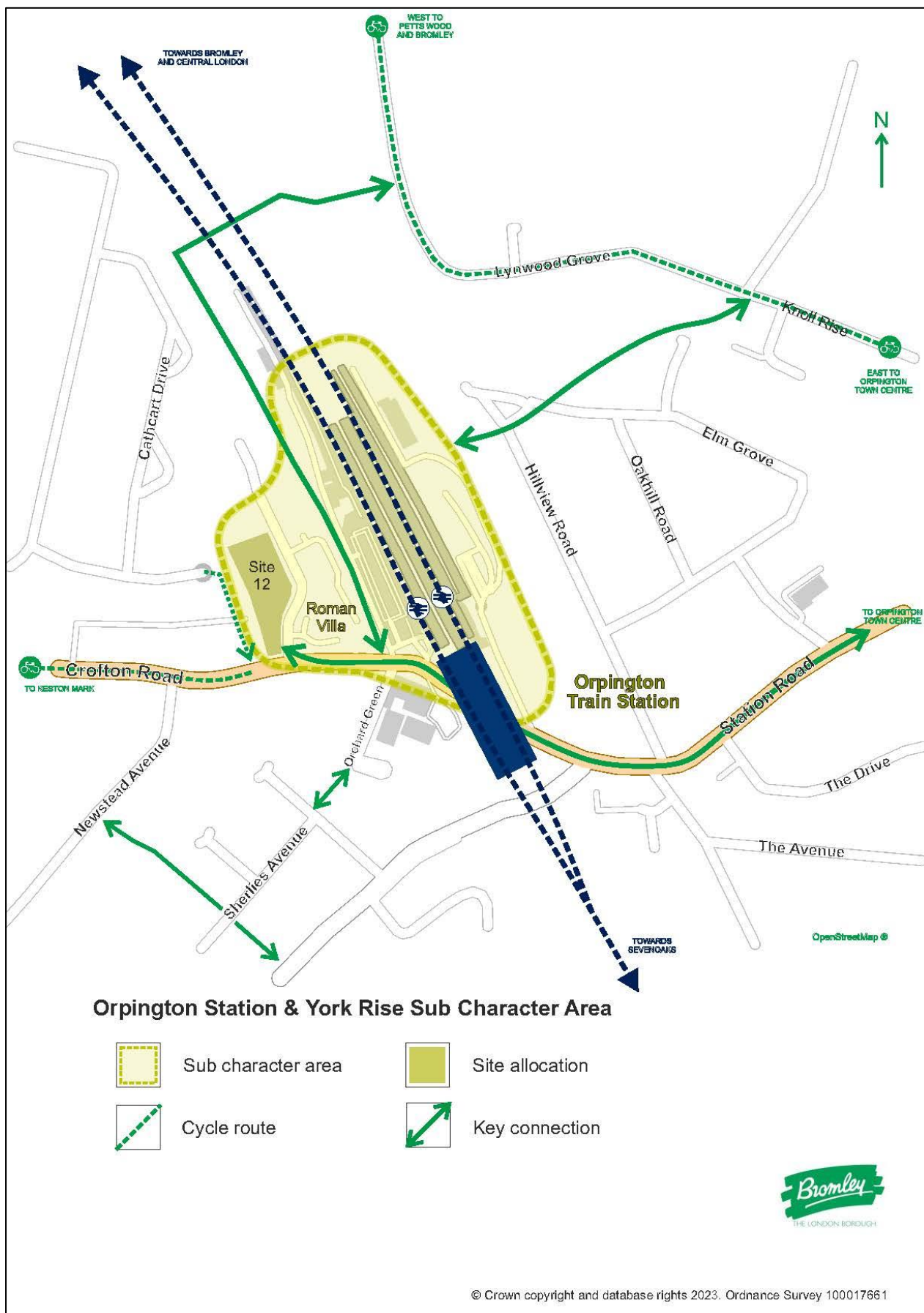


Orpington Station & York Rise

- 8.15. This sub-area is framed around Orpington Station, a key public transport facility for the east of the Borough which enables access into Central London in 15 minutes. The sub-area includes a Local Plan site allocation - Site 12, Small Halls, York Rise, Orpington. Planning permission for development of 35 residential units was granted in December 2021²⁶. This site has excellent public transport accessibility due to the proximity to Orpington Station, with a PTAL rating of 6a.
- 8.16. The sub-area is outside Orpington Town Centre and currently feels slightly detached from the town centre; this is exacerbated by the area's topography. Station Road (A232) runs between the sub-area and the 'Western Edge' sub-area; while it does not fall within a character area, there may be potential for some intensification of development and public realm improvements.
- 8.17. In design terms, the sub-area should be considered in relation to the town centre and not as being a separate or unrelated entity. The area is low-rise with two-storey development being prevalent.
- 8.18. The siting of the station to the south west of the town centre creates issues of severance and wayfinding difficulties. The current planning policy context and site allocations present an opportunity to address this challenge, firstly by improving pedestrian and cycle connections between the station and town centre, and secondly by transforming the station environment into an attractive and functional urban space which better integrates Orpington with the Crofton suburb.
- 8.19. The two existing key pedestrian and cycle routes into the town centre via Station Road and Knoll Rise should be integral to any future wider public realm strategy; these should be attractive for pedestrians and cyclists, leafy and navigable, with places to pause along the way.
- 8.20. Remaining distinct in character from the rest of the town centre, this area can become a vibrant urban place with activity generated by the station and improved public realm, which may include a station square to enhance the setting. New development should seek to compliment local heritage assets, including Crofton Roman Villa, which could become a clearer character reference for the area. Any future redevelopment in the vicinity of the Roman Villa enclosure should consider how to enhance the local environment in a way that positively impacts on this historic attraction, thereby supporting its viability and the preservation of the remains.
- 8.21. Residential uses would be an acceptable land use, although some small-scale commercial uses may be suitable.
- 8.22. The area along Crofton Road and Station Road, between Orpington Station and the High Street, features a number of houses, some commercial uses and stretches of blank frontage. While not having a discernible, overarching character, it nevertheless forms a critical connection between the defined Major Town Centre and the station (and on to Central London and the wider South East). Development proposals along this stretch should pay careful attention to the interface with the public realm to support the enhancement of this important route and should accord with the prevailing two storey building heights.

²⁶ Planning permission reference: 21/02861/FULL1

Figure 10: Orpington Station & York Rise sub-area





THE LONDON BOROUGH
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Orpington Town Centre Supplementary Planning Document

Regulation 12(a) Consultation Statement

June 2023

1	Introduction	1
2	Preliminary consultation information	2
3	Preliminary consultation responses	4
4	How did the issues raised in the preliminary consultation inform the draft SPD?.....	8
5	Draft SPD consultation information	12
6	Draft SPD consultation responses	14
7	How have the issues raised in the draft SPD consultation been addressed in the final SPD?	47
	Appendices	77
	Appendix 1: summary of Commonplace question responses, by theme 	77
	Appendix 2: summary of written responses, by theme	102
	Appendix 3: Summary of Commonplace map responses received	110
	Appendix 4: example of ‘Nuts to the Walnuts’ standard questionnaire template.....	112

1 Introduction

- 1.1 This Consultation Statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement accompanies the Orpington Town Centre Supplementary Planning Document (SPD). The statement sets out details of the consultation undertaken to inform preparation of the SPD.
- 1.2 Two significant consultation exercises were undertaken:
 - A preliminary consultation which informed the draft SPD.
 - A consultation on the draft SPD.
- 1.3 This statement sets out details of who was consulted as part of these consultation exercises; a summary of the main issues raised in each exercise; and a summary of how these issues were addressed.

2 Preliminary consultation information

- 2.1 From 15 July 2020 to 5 October 2020, the Council launched a consultation¹ using Commonplace, an online consultation portal. Commonplace allowed respondents to provide comments in response to specific themes and allowed comments to be submitted via a mapping tool (including the ability to pin comments to specific areas on the map).
- 2.2 Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
- 2.3 The consultation sought views from a broad range of individuals and organisations on how the Council should guide the development of Orpington Town Centre. The link to the preliminary consultation can be found here.
- 2.4 187 representations were received; 172 were received online through the Commonplace portal, and 15 were received by email/post.
- 2.5 Public consultation is not a statutory requirement during the preliminary stages of drafting an SPD. However, public consultation at an early stage ensures key issues can be identified and reflected in the drafting of the SPD where appropriate.
- 2.6 The Commonplace consultation sought views on the following 10 themes, asking a range of specific questions on these themes:
 - The future of Orpington
 - Housing
 - Transport and infrastructure
 - Offices
 - Retail, culture and leisure
 - Public realm, permeability and connectivity
 - Historic environment
 - Green infrastructure
 - Environment and air quality
 - Development opportunities
- 2.7 The Commonplace portal also provided the opportunity to make general comments (i.e. not in relation to a specific theme). The mapping portal allowed comments to be made in relation to specific points on a map of Orpington, and for others to agree with comments made. Whilst some use was made of the map and the 'agree' feature, the majority of respondents made their own comments under the various theme headings.
- 2.8 Several representations were also received in traditional letter/email format, chiefly from organisations and bodies.

¹ Orpington Town Centre SPD, Commonplace webpage, available from: <https://orpingtontowncentre.commonplace.is/>; and <https://orpingtontowncentremap.commonplace.is/>

2.9 Of the online responses (excluding the broad responses under ‘General Comments’ and ‘The future of Orpington Town Centre’) the ‘Environment and Air Quality’ theme received the most representations.

Table 1: Response rate to Commonplace consultation, by theme

Specific Topic	Responses	% of Responses
Environment and air quality	23	19
Transport and infrastructure	20	16
Green infrastructure	19	15
Housing	15	12
Retail, culture and leisure	13	11
Development opportunities	11	9
Historic environment	10	8
Public realm, permeability and connectivity	8	6
Offices	5	4
Total	124	100

3 Preliminary consultation responses

- 3.1 This section sets out the key headlines of the responses received as part of the preliminary consultation between July and October 2020, including details of common issues raised. More detailed summaries of the representations are provided in the appendices.

General comments

- 3.2 Responses sought guidance within the SPD to enable future developments to be flexible and adaptable. Comments highlighted that future developments should be resilient to changing circumstances but also able to respond to and support change, whilst character and local distinctiveness should be enhanced. There was a strong view that the SPD should support a reduction in carbon emissions, promote active travel and protect natural resources with the benefits of increased walkers, residents and cyclists within the town centre to the local economy and town centre viability recognised. Brownfield sites were noted as being opportunities for future development with the SPD providing clarity over the scale and nature of redevelopment.

The future of Orpington Town Centre

- 3.3 Numerous representations under this heading were also covered in more detail in the particular themes.
- 3.4 The importance of flexibility was highlighted to ensure that town centre uses can adapt and thrive, with mixed retail, culture and leisure/public realm flagged as core functions of the town centre. The importance of outdoor space was particularly highlighted in the comments, in particular functional and enjoyable civic spaces. Community spaces and activities should be prioritised. The town centre should be accessible and safe for all and various suggestions were made to improve social interaction and sense of community including a range of events and market activities
- 3.5 The complete or partial pedestrianisation of the High Street came through as a strong theme with increased opportunities for safer walking/cycling and better permeability.
- 3.6 Representations suggested that the area around the market square should be identified for tall buildings; however, comments also noted that development should be low rise and human scale and that new residential properties should be affordable and not just investments.
- 3.7 The contribution of the night-time economy and residential development to the vibrancy of the town centre during day and night was recognised and expansion suggested. Comments also noted the potential for shared workspaces.
- 3.8 The importance of green infrastructure was raised in several comments and this was seen as key to the town's reputation.

Housing

- 3.9 It was suggested that the SPD should increase housing density within town centre envelope with design guidance identifying potential sites for improvement or redevelopment. Responses

noted the opportunity to provide different housing typologies, contribute to the boroughs housing targets and reduce pressure on the Green Belt, whilst increasing footfall to the town centre, and supporting local businesses. The Walnuts redevelopment was specifically highlighted.

- 3.10 New homes should meet or exceed residential standards and create high quality accommodation. The greatest preference was for 2 bed units with a strong emphasis on affordability with buy to let discouraged.
- 3.11 The importance of supporting infrastructure for new homes was highlighted, notably transport and community infrastructure (e.g. health provision)

Transport and infrastructure

- 3.12 There was a general support and encouragement within the comments for a reduction in cars within the town centre, with considerable reference to pedestrianisation opportunities and alternative uses of current road space, whilst acknowledging the importance of addressing the needs of those with limited mobility.
- 3.13 The need for an increase in active travel and improvements in public transport was linked strongly with the view that a holistic transition to active travel and public transport would present both environmental, health, social and economic benefits. References were made to the adoption of Healthy Streets principles, creating space for safe active travel and high-quality public realm for walking and cycling.

Offices

- 3.14 Comments suggested building of new offices should be delayed, noting the changes in working patterns related to the pandemic.
- 3.15 There was a strong emphasis on the need for buildings to be multi-use/flexible to accommodate future ways of working.
- 3.16 Generally, the view was that the conversion of offices to residential use should be restricted.

Retail, culture and leisure

- 3.17 There was strong support for the Town Centre to diversify to respond to changes in the retail environment, as such there should be a strong focus on leisure and cultural facilities and existing facilities should be strengthened. Small and independent operators and meanwhile/temporary uses should also be supported. There was support for the town centre to become a recognised environmental leader.
- 3.18 Developments should deliver and support new spaces for socialising and have regard to Sport England's Active Design Guidance. Trees and hedging should be increased. There was also support for space to enable events, markets, play areas for children, dog free areas and spill out areas and a range of indoor event facilities were suggested – including possible integration with the library or redeveloped leisure centre.
- 3.19 Redevelopment potential, including mixed education and residential redevelopment of Orpington College, was suggested.
- 3.20 Complete or partial pedestrianisation of the High Street was again suggested with parking/drop off allowed for people with particular needs such as the disabled and elderly.

Public Realm, permeability and connectivity

- 3.21 Responses suggested that the SPD should acknowledge the importance of the public realm which adds economic value and distinctiveness, supports active travel and health, and support improved connectivity / permeability between the town centre and station.
- 3.22 Comments included suggestions for public realm improvement such as pedestrianisation, links to parks, walking and cycling routes to the town centre, an increase in outdoor sheltered spaces, more place to sit and meet, remove barriers and provide step free access.
- 3.23 There was strong support for the Market Square to be enhanced and promoted as a community hub, for community activity, congregation and engagement

Historic Environment

- 3.24 Respondents considered that the SPD should acknowledge the benefits of the historic environment, including the economic and cultural benefits of the Priory Conservation Area and the Listed Priory, and to ensure the effective management and protection of the historic environment.
- 3.25 Whilst there was some support for high density development, it was emphasised that this should be of high-quality design, informed by context, and that potential tall buildings should be managed in relation to heritage assets and their setting.

Green infrastructure

- 3.26 The importance of green infrastructure was highlighted throughout the responses and not just confined to responses to this theme. Emphasis was placed on the benefits of parks and green spaces for health, biodiversity and as an essential element of seeking to achieve net zero carbon.
- 3.27 There was a strong view that parks and green spaces should be protected and expanded with biodiversity in and around the town centre should be enhanced.
- 3.28 The importance of new development providing green infrastructure and strengthening and developing links with existing local green spaces was raised, along with the need to seek opportunities to retrofit existing buildings.
- 3.29 Responses felt that there should be a commitment to protect the Green Belt.

Environment and air pollution

- 3.30 Comments generally sought a reduction in traffic along the High Street and an improvement in air quality, which would have multiple suggested benefits. The pedestrianisation of the High Street was suggested, along with speed reductions, energy efficient buses, and new and improved pedestrian routes.
- 3.31 Concern was raised about air pollution at the War Memorial roundabout.
- 3.32 Representations suggested that new developments and/or major refurbishments should be carbon neutral as a minimum or ideally carbon negative., with sustainable technologies and greener construction methods utilised and sustainable urban drainage schemes promoted.

Development opportunities

- 3.33 Comments on this theme were consistent with some of the comments on the Housing theme.

- 3.34 The need for high quality design, in keeping with the surrounding area, was emphasised.
- 3.35 Comments acknowledged the location of Orpington within the Cray Valley renewal area, and the potential for delivery of a significant number of new homes through the Walnuts redevelopment along with new social infrastructure, jobs and improved public realm.
- 3.36 The opportunity to deliver new residential, education and commercial development on the Orpington College campus and adjoining car park was highlighted
- 3.37 It was suggested that a landmark tall building could identify Market Square which it was felt currently lacks visibility.

4 How did the issues raised in the preliminary consultation inform the draft SPD?

- 4.1 This section of the statement provides a summary of how the issues raised in the preliminary consultation informed the consultation draft SPD. Summary details are provided with reference to the structure and section headings of the draft SPD.

Vision

- 4.2 Bromley adopted its Local Plan in 2019 with a vision for the Borough. The representations received helped to develop an Orpington-specific vision for the SPD, in line with the Local Plan vision.

Context

- 4.3 A strong theme coming through the representations was the importance of understanding the Orpington context. Therefore, having first set out the policy framework within which the SPD would operate, the SPD also addresses the context of Orpington, considering its townscape and growth over time, the topography of the landscape, the land use, scale and character of development, and local heritage and the green networks.
- 4.4 This contextual work informed the identification of the SPD character areas and sub-areas which are set out in Section 5 of the draft SPD with detailed guidance on each provided in Sections 6-9.

Design Principles

- 4.5 It was very clear from the representations that the SPD should ensure the delivery good quality design. The SPD therefore identifies six overarching design principles addressing the key characteristics of successful well-designed places.
- Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 4.6 Further detail about the principles is set out in Section 4 of the draft SPD.
- 4.7 Guidance responding to the matters raised in the consultation is provided through the 'SPD guidance notes'; these guidance notes seek to address the matters raised in section 2 of this Consultation Statement and the detailed appendices (where appropriate). Noting that the SPD cannot itself set policy, the guidance notes provide further guidance on relevant adopted Development Plan and national planning policies related to the six design principles, as they relate to the Orpington Town Centre area.

Guidance Notes 1 to 8

- 4.8 Overarching Guidance Note 1 requires proposals to demonstrate how they have addressed the six design principles set out within this SPD and specific guidance relating to the character area within which they are located.
- 4.9 Guidance Notes 2 to 8 indicate in more depth how development proposals should respond to the individual Design Principles, addressing the general quality design issues raised in the consultation.
- 4.10 Guidance Note 2 relates to the Context Design Principle. Comments on the preliminary consultation raised the importance of protecting character and distinctiveness but balanced with allowing for change and building in resilience. Guidance note 2 sets out the importance of reinforcing local identity and a sense of place through strengthening existing physical, natural, social and cultural assets.
- 4.11 Guidance Note 3 relates to the Responsive Design Principle. This emphasises the importance of high-quality design developed through a detailed process of review and collaboration. The need for high-quality design was a common theme from the consultation responses, with particular emphasis on the proposed Walnuts redevelopment (which is covered by specific character area guidance elsewhere in the SPD).
- 4.12 Guidance Note 4 relates to the Connected Design Principle, which seeks to improve connectivity in the area and establish new routes that correspond with existing routes. The need for improved public realm and key routes, including strengthened links with the railway station, were raised in the consultation.
- 4.13 Guidance Note 5 relates to the Inclusive Design Principle, which pushes new development to achieve the highest standards of inclusive design, contributing to a built environment that is safe, accessible, and convenient for all. There were several comments relating to the need to design new development to be inclusive, as well as related comments.
- 4.14 Guidance Notes 6 and 7 relate to the Healthy Design Principle, which prioritise the importance of health and wellbeing as part of the assessment of planning applications. Health came up as part of a number of comments, linked to suggestions to increase green infrastructure and improve active travel.
- 4.15 Guidance Note 8 relates to the Sustainable Design Principle, referencing key sustainable design policies to emphasise the requirement to achieve high sustainability standards. Sustainability and net zero carbon were common issues raised by respondents. Comments raised a number of potential issues which the SPD could focus on, including promoting sustainable travel, providing new green spaces, improving air quality and encouraging retrofit over demolition.

Character areas

- 4.16 As noted above, the Orpington context has informed the SPD character area boundaries. Guidance Notes 9 to 17 relate to general guidance that applies consistently across all character areas. Guidance specific to each sub-area is provided in sections 6 to 9 of the SOPD (discussed below).
- 4.17 Guidance Note 9 relates to heritage and conservation issues, highlighting the importance of the historic environment in Orpington which adds significantly to the character and distinctiveness of the area. The Guidance Note expects development proposals to clearly address heritage impacts. A number of consultation comments related to the historic

environment; respondents suggested that the SPD should acknowledge the benefits of the area's heritage assets and should manage development (including tall buildings) in relation to their impacts on heritage assets.

- 4.18 Guidance Note 10 addresses density, referencing the London Plan design-led approach to ensure the most appropriate form and land use for the site. A number of consultation comments across several themes raised the issue of density; some comments were supportive of increasing density but noted the need to ensure high quality design and provision of other benefits such as improved public realm and green infrastructure.
- 4.19 Guidance Note 11 sets requirements for the consideration of proposals for tall buildings in Orpington, in line with policy D9 of the London Plan. The guidance note references the importance of local views. There was some support for taller buildings in the consultation comments, but respondents note the need for high quality design and for proposals to be contextual. Some respondents thought Market Square was a particularly suitable location for tall buildings.
- 4.20 Guidance Notes 12 and 13 relate to Transport and connectivity in Orpington. These Guidance Notes promote enhancements to existing pedestrian and cycling routes and the creation of new routes, noting that the route to the station is a priority. Improved permeability to enhance sites at the rear of the High Street is also promoted, with greening of new routes encouraged. These Guidance Notes relate to a number of comments made across different themes. The link to the station was raised by a number of respondents. Comments also referred to the need to diversify the High Street; the opening up of backland sites offers the potential for new/expanded uses to add to the town centre's diversity.
- 4.21 Guidance Note 14 addresses green infrastructure and biodiversity in Orpington. It promotes the enhancement of biodiversity as part of the network of green spaces linking with the wider Cray Valley. Biodiversity was an issue that was raised across a number of comments, which highlighted the importance of the issue and the need for development in Orpington to contribute to improved biodiversity.
- 4.22 Guidance Note 15 addresses sustainability concerns, reflecting adopted policy in the London Plan. Sustainability was a popular issue raised by respondents, particularly relating to achieving net zero carbon emissions. Retrofitting was also raised; the Guidance Note encourages retrofit and links with guidance for certain character areas with existing building typologies where a retrofit approach may be a practical proposition.
- 4.23 Guidance Note 16 reiterates the particular Renewal Area policy requirements relating to development in Orpington. These policy requirements overlap and address many of the consultation comments received.
- 4.24 Guidance Note 17 relates to the new Use Class E and associated PD rights. The introduction of Class E and the PD rights post-dates the start of the consultation. While Class E does allow for some flexibility with town centre uses, it could affect the vitality and viability of town centres. Consultation comments noted the need for diversity of uses with a mix of cafes, restaurants and entertainment uses amongst other uses. The Guidance Note will help to ensure that any adverse impacts of Class E and the PD rights are mitigated to protect the ongoing vitality and viability of the town centre.

Character areas and sub-areas

4.25 The SPD identifies the following character areas and sub-areas:

- **Orpington East character area**

- Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area
- Eastern Edge sub-area
- **Orpington North character area**
 - The Village sub-area
- **Orpington West character area**
 - Orpington High Street sub-area
 - Western Edge sub-area
 - Orpington Station & York Rise sub-area

4.26 Detailed guidance is provided for the sub-areas, with reference to specific development opportunities where relevant. The guidance in the sub-areas links with a number of comments made in response to the consultation, particular on issues like design, green infrastructure and land use.

5 Draft SPD consultation information

- 5.1 From 9 March 2022 to 1 July 2022², the Council consulted on the draft Orpington Town Centre SPD.
- 5.2 The consultation was publicised extensively, as follows:
- The draft SPD and supporting documents³ were hosted on the Council SPD webpage⁴, with a link from the main consultation webpage⁵. Comments were invited by email, in writing or via a questionnaire hosted on Survey Monkey.
 - The consultation was promoted in Council's digital newsletter (to 70,000 residents).
 - Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
 - Three Council news releases were issued - one at launch, one as a reminder mid-consultation⁶, and one as a final reminder prior to the consultation deadline. These news releases were also shared with the Business Improvement District (BID), community groups and residents associations, who were encouraged to circulate to their members.
 - Social media posts scheduled between the news releases from the Council's accounts, using graphics created to promote the consultation
 - Three digital posters created to display on the digital advertising screens in the town centre. Copies of the posters were also distributed to local libraries.
- 5.3 996 representations⁷ were received in total, as follows:
- 468 via email.
 - 406 in writing (hard copy) including 365 responses submitted in a template created by a local campaign group ('Nuts to the Walnuts').
 - 122 responses submitted via the Survey Monkey questionnaire on the Council's website
- 5.4 768 respondents (77%) live or work in the Orpington area (within BR5 and BR6 postcode areas).
- 5.5 The Council wishes to thank all respondents for taking the time to respond to the draft SPD. All comments have been considered and have helped to inform the final SPD. Section 6 of

² The consultation was initially planned to run from 9 March 2022 to 1 June 2022, but was extended by one month to allow additional time for submission of responses. This extension of time was publicised in the same manner as the initial consultation.

³ Supporting documents were a previous version of this consultation statement (detailing the information in sections 2 to 4, and appendices 1 to 3; and a Strategic Environmental Assessment screening statement.

⁴ <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

⁵ <https://www.bromley.gov.uk/consultations>

⁶ The consultation took place over the 2022 Local Election Purdah period, which limits what information can be publicised; therefore the mid-consultation reminder was not sent until post-Purdah.

⁷ Some respondents submitted representations via different formats, e.g. email and survey. The total figure excludes this double counting, but it is noted that all comments submitted were assessed in detail (as set out in sections 6 and 7 below).

this document summarises the comments received, while Section 7 provides the Council's response to the comments.

6 Draft SPD consultation responses

6.1 This section sets out the key headlines of the responses received as part of the draft SPD consultation between March and July 2022. Details are set out as follows:

- Summary of ‘Nuts to the Walnuts’ campaign group responses
- Summary of issues raised by consultation responses

Summary of ‘Nuts to the Walnuts’ campaign group responses

6.2 365 responses were received from the ‘Nuts to the Walnuts’ campaign group. These responses were submitted via a standard questionnaire template (see example at Appendix 4) or in a very similar form. The template also invites respondents to provide additional comments; these are summarised in the section below (‘Summary of issues raised by consultation responses’).

6.3 The following eight specific issues were identified by the questionnaire, with respondents invited to tick the issue/issues that they felt strongly about:

- No buildings taller than Brunswick House
- Leisure centre updated or new one built before demolition
- Enough GP surgeries and hospitals
- Enough schools
- Public transport
- More visitor parking spaces
- Keep functioning shops we have now
- Keep character of small Kent town

6.4 Table 2 sets out the response rate for the eight issues. 241 respondents (66%) ticked every issue:

Table 2: Response rate to ‘Nuts to the Walnuts’ template responses, by issue

Issue	Number of responses to raise this issue	% of responses to raise this issue
No buildings taller than Brunswick House	317	87%
Leisure centre updated or new one built before demolition	329	90%
Enough GP surgeries and hospitals	328	90%
Enough schools	318	87%
Public transport	316	87%

Issue	Number of responses to raise this issue	% of responses to raise this issue
More visitor parking spaces	294	81%
Keep functioning shops we have now	318	87%
Keep character of small Kent town	311	85%

Summary of issues raised by consultation responses

- 6.5 631 consultation responses were received via email, in writing and via a questionnaire on Survey Monkey. In addition, 318 'Nuts to the Walnuts' template responses provided further comments in addition to completing the questionnaire indicating which of the eight issues they felt strongly about.
- 6.6 The issues raised by the respondents have been grouped into the following topics for the purpose of this consultation statement (NB: some respondents raised comments on more than one topic). Comments which did not fall under these topics are discussed in the general comments section. Two respondents commented on the Strategic Environmental Assessment screening statement that accompanied the consultation; these comments are also discussed below.
- 6.7 Section 7 sets out the Council's response to the issues raised in paragraphs 6.8 – 6.235.

Table 3: Response rate to draft Orpington Town Centre SPD consultation, by topic

Specific Topic	Number of responses to respond to this topic	% of responses to respond to this topic
Tall buildings, character	691	73%
Social infrastructure	381	40%
Heritage and design	213	22%
Transport	351	37%
Leisure centre	562	59%
Housing inc. Affordable Housing	251	26%
Environment and air quality	251	26%
Commercial uses (retail, leisure, office)	401	42%
Public realm, permeability and connectivity	292	31%

Tall buildings, character

- 6.8 A number of respondents noted the importance of protecting local character, including comments about the need to retain Orpington's small Kent town character and leafy suburban/open/rural characteristics. Respondents noted the potential for high-density new development to impact significantly on character. A number of comments also raised the need to protect views of the Kent countryside as currently viewed from the town centre. Some respondents noted that Orpington should not seek to compete with Bromley Town Centre, it has its own distinct character which should be protected. Many respondents commented that

they were satisfied with the current level of development, indicating that new buildings should respond to the height, scale, bulk and mass of existing buildings.

- 6.9 Several respondents commented that they were keen to see Orpington revitalised (noting agreement with the Building Back Better High Streets initiative) which they felt could act as a catalyst for further regeneration. There was some support for sensible, proportionate development, upgrading and improving sympathetically in keeping with existing buildings.
- 6.10 Many respondents commented on tall buildings, expressing the following concerns:
- Orpington should only have low rise developments in keeping with the surrounding area.
 - 'Nuts to the Walnuts' commented on building heights provided comments based on a Facebook survey. The group stated that sensible proportionate development plans for Orpington are supported, particularly considered and sympathetic development on a scale which is in keeping with existing buildings, and which is realistically deliverable within the town's existing infrastructure and safeguards the quality of life here for current and future residents. For these reasons the group considered 6 blocks of flats, around 1 – 4 storeys tall would be suitable, but ultimately buildings should be no taller than the nine storey Brunswick House; no planning or design justification was put forward to support this but it is aligned with the majority view from their Facebook survey.
 - A number of other respondents suggested Brunswick House as an appropriate basis for determining the heights of new buildings.
 - There were numerous other suggestions for capping heights, ranging from one to nine storeys. Several respondents suggested that development should be 'human scale'.
 - A number of respondents considered that an additional wayfinding building is not necessary, as Orpington already has the 11 storey Orpington College which acts as a wayfinding building.
 - 'Nuts to the Walnuts' questioned why the Council consider that Orpington East could host a 12 – 15 storey building, or taller, if it is "a visual marker providing a positive landmark at the heart of Orpington Town Centre" (SPD paragraph 6.4, p35)? The group considered that this would clearly not fit with the overall form and layout of the surroundings and is contrary to the advice in national planning policy, GLA officers (as expressed in the GLA Stage 1 response to the planning application for the Walnuts site) and elsewhere in the SPD (paragraph 5.15, p26). The group note that area is characterised by a range of two and three storey buildings; and that tall buildings will not preserve or enhance the existing qualities of Orpington's town centre. They will block out light, change the skyline and are incompatible within such close proximity to the town's Conservations Areas.
 - A respondent sought clarity about the Walnuts and the College site and considered it is ambiguous whether the guidance allows buildings of more than 15 storeys.
 - 'Nuts to the Walnuts' noted that planning permission is often granted using existing buildings as precedents, therefore permission for a single 12 – 15 storey building in Orpington East would be concerning as developers may get permission to build several more tall buildings in the Eastern Edge, Western Edge, Orpington High Street and the Orpington Station and York Rise sub-areas. This would be terrible for the town and its residents. Furthermore, the precedent could be used throughout the area and there could be successful submissions for tall buildings elsewhere, e.g. in Derry Downs. Other respondents made similar points, noting the potential for 'tall building creep'.
 - A number of respondents raised the potential for tall buildings to cause microclimate, overshadowing and overlooking impacts, with some stating that proposed buildings which would cause significant light loss and shadowing be denied planning permission.
 - A respondent suggesting that if tall buildings go ahead then higher elements should be for commercial purposes as this is less intrusive in terms of overlooking

- Some responses considered that tall buildings are bad for mental health, with a specific concern raised regarding the physical environment created by tall buildings for those with sensory processing disorder, autism or ADHD.
 - Some responses considered that tall buildings will lead to an increase in crime and ASB.
 - Several respondents suggested that tall buildings are not suitable for children.
 - The expense of maintenance of tall buildings was highlighted
- 6.11 A number of respondents raised issues relating to fire safety, with some citing the Grenfell Tower tragedy and subsequent public inquiry. Some responses raised concerns relating to the evacuation of people with limited mobility from upper floors.
- 6.12 'Nuts to the Walnuts' consider that the SPD should state that all developers building high-rise homes will be contractually obliged to fund and carry out Personal Emergency Evacuation Plans (PEEPs) once residents have moved in. PEEPs for subsequent residents should be funded by the management company or freeholder. Other respondents noted concern about the lack of fire appliances to tackle fires in high-rise buildings, and the need to consult the London Fire Brigade on tall building applications.
- 6.13 'Nuts to the Walnuts' also consider that the SPD should state that developers must fully uphold several legal obligations, including the Fire Safety Order 2005, the Equality Act 2010, and the Human Rights Act 1998, as a condition of planning permission being granted.
- 6.14 'Nuts to the Walnuts' consider that applications for tall buildings should be required to carry out computer modelling to show the extent of overshadowing that would occur if buildings are constructed; and that information should be sought to ascertain any impacts as a result of any increased winds.
- 6.15 One respondent noted the need for tall buildings to have disabled access.
- 6.16 A number of respondents referred to recent development of taller buildings in areas such as Croydon, Lewisham and Greenwich, and further afield in Hong Kong, Tokyo and Manhattan; there was a general view that these developments were poor and that they should not be replicated in Orpington.
- 6.17 Historic England noted concerns about the potential for a very tall building as part of development of the Walnuts shopping centre; this is discussed in more detail in the 'Heritage and Design' section below. Notwithstanding comments in relation to tall buildings on specific sites, Historic England noted that SPD 11 (tall buildings) should also include reference to local plan policy 42 as well as NPPF section 16, given the potential for visual impacts on nearby heritage assets. This was echoed by a number of other respondents who stated that consideration of the impact on the adjacent conservation area and local views of importance (including views not designated in the Local Plan) must be given before planning permission is granted. Other respondents raised the potential for impacts on the Green Belt and nearby AONB.
- 6.18 Several respondents cited the London Assembly Planning & Regeneration Committee investigation on living in high rise buildings, to support comments on the adverse impacts of tall buildings.
- 6.19 Orpington 1st considered that the height of development in the town centre should not be unnecessarily restricted – particularly if it facilitates broader benefits; but providing that the architecture, design, and delivery are of the highest quality.
- 6.20 A developer/landowner welcomed the guidance on the Walnuts and Market Square in the draft SPD, which identifies the opportunity for delivering a significant quantum of new housing

and commercial development, alongside a new leisure centre, public realm enhancements and provision of significant green space / play space / street greening. The respondent notes support for several elements of the guidance including retaining Market Square as the civic heart of Orpington, the promotion of additional greening and connectivity improvements. However, the developer/landowner notes concerns about some of the key parameters for development proposals in this area

- LBB do not provide any justification within any accompanying evidence base to the draft SPD that tests the appropriateness of the heights contained within the key parameters. In the light of this, the LBB have failed to demonstrate how the identified heights for this development opportunity area have been established. The guidance set out in the draft SPD is to inform the how the Development Plan is to be delivered; however, the draft SPD is not “sound” as defined by paragraph 35 of the NPPF e.g. it is not justified through proportionate evidence and is not consistent with national policy on several matters. The respondent considers that no evidence has been provided to robustly justify why or how the heights and massing set out in the key parameters have been established (which is required by London Plan policy D9). It is important to highlight that there is a need for a balanced approach when considering development proposals that include tall buildings such as those at the Site. It is therefore recommended that the key parameters with regards to height are revised and/or justified through proportionate evidence. In the absence of a proportionate evidence base, Guidance Note 11 should be revised to simply acknowledge the site is appropriate for tall buildings and that actual heights fall to be determined at planning application stage following completion of a full assessment considering all relevant criteria set out in London Plan Policy D9.
- within the draft development parameters, reference is made to the use of red and buff brick on the High Street to inform new development in the area. The respondent is opposed to this prescriptive requirement and encourages the LBB to replace this with a requirement for development in this area to draw upon key characteristics of the surrounding area when considering the proposed materiality of developments. This then provides opportunity for other materiality approaches to be explored.

6.21 The developer/landowner also commented on guidance provided for the Orpington West area, noting that whilst the high street is predominately characterised by 2-3 storeys this should not be a blanket approach when considering appropriate heights for this location. When establishing appropriate heights on the High Street and the area behind, proposed heights should be robustly tested and justified at planning application stage having regards to relevant policy considerations.

6.22 A local group supported the reference to the National Design Guide in paragraph 5.9 of the SPD.

6.23 A local group considered that the descriptions in paragraph 5.10 were too general and should be enhanced by referring to the specific Grade listing.

6.24 A local group expressed concern about guidance note 9, considering that it does not appear to defend heritage assets in line with the Historic Environment Objectives set out in the Bromley Local Plan. They consider that the emphasis is on minimising impact assessments, rather than conducting effective impact assessments; and that the guidance that the “level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on its significance” is open to wide interpretation, and is itself not sufficient. It seems skewed in favour of developers. The group consider that a more satisfactory wording would be the “level of detail should be proportionate to the asset’s importance and clearly demonstrate the potential impact of the proposal on its significance, including a worst-case scenario”. They believe that this should ensure that the

impact of green or tree screening is considered, including in winter, when trees are bare of leaves.

- 6.25 The local group also consider that guidance note 9 should further state that Visual Impact Assessments should be made from positions where the view is clear, and not obscured. As a general principle, it should always be clear that any development should enhance the environment by showcasing history, not detracting from it.
- 6.26 A local group reference London Plan policy GG2 (E), noting this is reflected in para 5.9 of the draft SPD, but does not appear to be reflected in Guidance Note 9. The group also suggest that the SPD should include stronger encouragement of a heritage centre / space / offering, which would be in keeping with London Plan policy GG1 (C) to “provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation”. Since the museum was closed, and the Priory building closed to the public there has been no cultural offering in the town for low-income families, and this should be promoted in the SPD, consistent with Bromley Local Plan’s Historic Environment Objectives.
- 6.27 One respondent suggested GN7 require tall buildings to provide publicly accessible viewing terraces, and rooftop gardens, whilst another highlighted that green spaces on top of buildings are rarely accessible to the general public.

Social infrastructure

- 6.28 A number of respondents raised the issue of existing pressure on infrastructure, which could worsen as a result of new development. Responses noted that new development should ensure that impacts of various types of infrastructure will be mitigated, including through provision of new services. The following types of infrastructure were highlighted specifically:
- GPs/nurses/doctors surgeries
 - Midwives
 - Community nurses
 - Social Services
 - Carers (specifically for the elderly),
 - Hospitals/ Urgent Care / A&E / Ambulance services
 - Mental Health provision (child, adolescent and adult)
 - Schools (primary, secondary, special educational needs)
 - Lifelong learning / adult education program for adults
 - Nurseries
 - Dentists (NHS)
 - Opticians
 - Police stations / hub and greater police presence/resources where necessary, to tackle existing ASB/crime and potential increases in ASB/crime as a result of new development.
 - More CCTV should be installed in the area to deter criminal behaviour
 - Fire station as a result of increased fire risk from taller buildings.
 - Facilities for the community - a community hub, for all generations and all abilities – noted difficulty for Orpington Dance school to find locations to run sessions. Other suggestions include an arts centre/community.
 - Sports facilities noting that private clubs are unaffordable for most Orpington residents.
 - Facilities for an ageing population – notably a good quality day care centre.
 - Places / facilities to support young people (youth centre). The positive impact of the temporary ice rink / pallet park at the rear of the leisure centre were flagged.
 - Cultural centre (one respondent suggested the college be repurposed for this).

- More recycling bins and litter pickers.
- Additional toilets accessible to all (specifically on the High Street).
- Decent sized church (specific reference to Hope Church currently located in the Walnuts).
- Spaces (indoor & outdoor) to host community events.
- Water fountains - to encourage reuse of water bottles.
- Waste facilities
- Water supply infrastructure and ability to manage surface water drainage – particularly during heavy rainfall.
- Flood protection
- Sewerage system
- Internet and communications

- 6.29 Local NHS stakeholders welcomed the vision set out in the SPD recognising the role the town centre will play in supporting the health and wellbeing of the south-eastern area of the borough. They raised the potential for growth and development in the town centre impacting on service provision and need for close working and engagement between the Council, the NHS and other infrastructure providers to identify impacts and necessary infrastructure provision at an early stage.
- 6.30 The NHS Healthy Urban Development Unit noted support for guidance notes 16 and 17 but suggested minor changes to guidance note 6 to impose a stronger requirement for Health Impact Assessments to be submitted as part of planning applications.
- 6.31 A number of respondents stated the importance of retaining the Saxon day centre. Some comments suggested retaining the existing centre as is, while others were more open to replacement facilities in the area but were clear that any replacement facility must be operational prior to the existing centre closing.
- 6.32 A local group suggested re-siting the Saxon Centre to Priory Gardens depot, with potential to expand health and wellbeing activities, create community garden, and benefit from access to formal gardens and green space.
- 6.33 'Nuts to the Walnuts' and other respondents recommended that the SPD include facts about the capacity of the town's existing infrastructure. The Council should obtain up-to-date reports on the availability of local nursery, primary and secondary school places, capacity at local GP surgeries and at local hospitals. The group, and other respondents, considered that accepting a sum of money from developers under the Council (sic) Infrastructure Levy (CIL) or by other routes does not absolve Officers and elected Councillors of their responsibility to ensure developments do not overload our existing infrastructure and that the Council should agree with developers that a large sum of money should be set aside and ring-fenced for use within Orpington town centre, to pay for the extra infrastructure required to support their plans.
- 6.34 Orpington 1st raised a similar issue, stating that the service provision from local and central government should reflect need, and the capacity requirement should be clearly referenced in planning. They would like to see reference to funds received by LBB for town centre developments being ringfenced for the benefit of the town.
- 6.35 A respondent considered that CIL may not fully off-set the required infrastructure required to support a development. A GAP exercise should be carried out to accurately identify issues in conjunction with other developments being progresses. Public realm improvements have been supplied through the BID partnership levy, so transparency is needed. The respondent also considered that paragraph 2.20 should be amended to include reference to social housing and homes for vulnerable.

- 6.36 One respondent considered that section 6 of the vision should add “facilitate” to as many activities as these activities would be organised by groups not the Council.
- 6.37 ‘Nuts to the Walnuts’ consider that the SPD should clearly state the density of new housing which the existing infrastructure can realistically support. Developers should have clear and deliverable plans on how to expand the infrastructure if larger numbers of homes are proposed. Developers should also bear most of the cost of any expansion.
- 6.38 ‘Nuts to the Walnuts’ recommend that the Council consult the Metropolitan Police in relation to police provision.
- 6.39 ‘Nuts to the Walnuts’ and other respondents state that the SPD should make it clear that the College should remain an educational establishment and not be used for residential or any other purposes. One respondent suggested that any redevelopment of the college building should prioritise retrofit rather than demolition and rebuild.
- 6.40 A developer/landowner supported the requirement to undertake extensive consultation (Draft Guidance Note 5) and to ensure that development proposals seek to promote and prioritise health and well-being (Draft Guidance Note 6).
- 6.41 One respondent suggested the inclusion of Policy 22 [Social Infrastructure in New Developments] in para 2.14.
- 6.42 One respondent noted their belief that the SPD vision confirms the college will remain.

Heritage and design

- 6.43 Historic England welcomed much of the content of the draft SPD including Sections 3 and 4 on the context and scale of the area and on future design principles. They considered that these sections usefully set out detail on understanding how the town centre has come to look and feel as it does today as well as sound principles relating to contextually successful new development proposals. Historic England did however note concern about the development opportunities outlined in section 6 (Orpington East sub-area); they considered that these are not based on an appropriate evidence base and that potential effects on the historic environment have not been properly assessed, understood or avoided. In particular, they consider the identification of the Walnuts shopping centre as a suitable site for what would be in local terms a very tall building to be premature at this stage, and that the draft SPD is in effect allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings.
- 6.44 Their principal concern with the contents of the SPD however relate to the proposed density and heights of development on the site of the Walnuts shopping centre. Historic England acknowledge the development potential of the site but consider that the draft SPD is premature in proposing development of the density and height in question without robust evidence to support it or understand the level of impacts likely to occur. It is noted that this site has come forward independently of the local plan process, and would appear to date to have not been subject to any assessment of the potential environmental effects the type of development suggested. The site is in close proximity to a number of designated heritage assets, including two highly graded listed buildings, the Orpington Priory conservation area and Priory Gardens registered park and garden. Together these assets help form the village-like character of the area to the north of the High Street. Historic England consider there is potential for adverse impacts on this character and the individual significance of assets if as proposed the site is allocated with a taller building of up to 15 storeys. This point is echoed by other respondents, as can be seen in the ‘tall building’ responses noted above.

- 6.45 Historic England further note the indication at paragraph 1.3 that the preparation of the draft SPD for the town centre will inform the local plan review process. Should the allocation of the Walnuts shopping centre site and the design parameters at paragraph 6.4 be confirmed in the SPD and carried forward to the emerging local plan, they consider that it would not be possible for the Plan to be in conformity with national and regional planning policy as it relates to the historic environment. Historic England conclude that, in relation to the Walnuts site, the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan; and that, while this is potentially problematic in itself, the absence of evidence and assessment of potential effects also fails to reflect the requirements of NPPF paras 31 and 190.
- 6.46 Due to these concerns, Historic England consider that the SPD should be subject to an SEA to ensure that the development process would proactively look to conserve and enhance the historic environment. They refer to various good practice and advice notes on issues that they consider are of relevance relating to the production of SPDs and SEAs. This is discussed in paragraphs 6.230 to 6.235 below.
- 6.47 Historic England welcome the helpful reproduction of the commitment to the protection and enhancement of the local historic environment from the adopted Local Plan at paragraph 1.7, but suggest that this should also be made explicit in the vision statement set out on page 4.
- 6.48 Historic England consider that section 2 (Policy framework) should be expanded to include relevant references to the historic environment in national, regional and local planning policy, particularly Local plan policies 38 (listed buildings), 41 (conservation areas) and 42 (development adjacent to a conservation area) and London Plan policy HC1 (Heritage conservation and growth).
- 6.49 Historic England welcome the sections and associated design principles on context and responsiveness at paragraphs 4.3 to 4.11, although they consider the first sentence of SPD2 to require some clarification. In NPPF terms, the word setting has a particular meaning (as set out in the NPPF glossary). Historic England note that, if the sentence in question is not referring directly to the setting of heritage assets, the terms townscape or character would be clearer in this instance. They also note that Local plan policies 38, 41 and 42 should be included in the list of relevant policy. A developer/landowner also noted that the current drafting of Guidance Note 2 is ambiguous and the use of the term “setting” without further clarification has the potential to be conflated with established policies relating to heritage assets. Suggested amended wording was put forward.
- 6.50 Historic England note that SPD 11 is clearly closely linked to the windfall sites identified in the form of the Walnuts shopping centre and Orpington College, and given the potential for visual impacts on nearby heritage assets, this section should also include reference to local plan policy 42 as well as NPPF section 16.
- 6.51 Historic England recommend that paragraph 3.25 is reconsidered to reflect the Archaeological Priority Area Tiers represented by this SPD, while it may prove helpful for a short Glossary to be added to the SPD where for example it can be clearly stated what is meant by Heritage.
- 6.52 Historic England suggest that there is potential for a separate Archaeology SPD for the Town Centre, referring to an example in Sutton. They consider that this would mean that potential developers could determine with confidence the archaeological context of their site and whether it would require early consideration in the planning process. It would also present a tool whereby public value can be expressed through the identified heritage, in the form of street art/furniture and other mediums and community activities in addition to opportunities to identify, enhance and cherish the heritage that makes these areas special.

- 6.53 'Nuts to the Walnuts' were pleased to see the Village sub-area's historic origins and distinctiveness recognised in the SPD, and that the sub-area's development potential is classified as low, which seems in keeping with the conservation status of most of that area. Another respondent suggested no development forward of the front building lines or above the current roof lines in the Village area.
- 6.54 'Nuts to the Walnuts' request that the SPD states that the external appearance of developments are important and that quality materials should be used which not only comply with safety standards, but are also pleasing to the eye and are in keeping with the surrounding area. Other respondents suggested that design should conform to the architectural and cultural heritage to maintain Orpington's traditional and historical setting. Some respondents referenced the need for beautiful development, citing the changes to the NPPF relating to beauty.
- 6.55 'Nuts to the Walnuts' consider that the SPD guidance about design-led development (paragraph 5.12, p25), which clearly states that quality of place should take precedence over the quantum of new development, is contradicted by the statement at paragraph 6.3, p35, which states that redevelopment of the Walnuts site offers the opportunity for delivering a significant quantum of new housing and commercial development. The group, and other respondents, consider that the SPD should be clear that the focus is on quality of place, not the quantity of new development.
- 6.56 Other respondents stressed the desire for development that would bring local pride and regenerate a local identity as much as the local economy.
- 6.57 A number of respondents noted that part of the High Street and North End of the town centre is a conservation area; and suggested that the rest of High Street and surrounding roads could be included too to preserve heritage. Respondents noted the importance of certain heritage assets in the area.
- 6.58 Several respondents noted the importance of protecting the character of residential areas on the edge of the town centre, and the need to mitigate any impacts of development on these areas.
- 6.59 One respondent noted the reference to scale of surroundings in the vision, and suggested that scale should be defined/limited as minimal change to that which already exists. The comment suggests that scale could in itself be the characteristic even if totally out of proportion to the town.
- 6.60 Some respondents stated a preference to restore old buildings of architectural merit to support existing businesses (the Post Office refurbishment was highlighted as a success), whilst another suggested brick cladding on developments, and another suggested artificial fronts to existing buildings where necessary to produce a homogenous high street that resembles a 1930s high street.
- 6.61 A local group suggested that the disposal of and subsequent limited public access to the Priory despite its historic and cultural value to the town, and the moving of the museum to Central Library despite many of the artefacts originating from and relating to Orpington and its environs, has had a detrimental impact on the Town Centre's cultural offer. The group suggest that the SPD acknowledge the impact that the disposal has had on the town centre and local community. Another respondent suggested that the Priory should be preserved.
- 6.62 There was support for proposals to take account of culture, heritage, scheduled monuments and archaeology in the planning process, and for the SPD guidance encouraging submission of a heritage statement.

- 6.63 Several respondents felt the opportunity should be taken to highlight various aspects of the history of the area.
- 6.64 Another respondent noted concern at the loss of the former water fountain in the Upper Pond and the former model boating 'lake' in Riverside Gardens
- 6.65 A respondent felt more clarity on what constitutes "enhancement" should be provided – suggests "by enriching or raising the standard of design or" be added after "High Street" in GN13. Another respondent supported the vision but sought definitions of both "enhanced" and "enrich".
- 6.66 One respondent questioned a change in policy from Areas of Archaeological Significance to Archaeological Priority Areas and felt that the SPD should be amended to refer to the draft Archaeological Priority Areas.
- 6.67 A respondent was concerned that the Crofton Villa area should be protected and not be over developed; another suggested no development 'by the Roman Villa'.
- 6.68 A developer/landowner considered that the requirement to ensure schemes are reviewed by an independent Design Review Panel will assist in ensuring that high quality development is brought forward in the town centre and as such, the requirement was supported.
- 6.69 Other respondents made the following comments in respect of an independent Design Review Panel referred to in GN3:
- conclusions should be advisory only, and should not be given priority over local residents' views.
 - the panel should include a proportion of local residents.
- 6.70 A respondent suggested running an architectural competition to provide some characterful fronts to shops to small parades alongside small terraces of attractive houses.
- 6.71 A respondent felt there should be more space around taller buildings to avoid a massive "Block" on the skyline. Another respondent sought clarification of the term 'block' in SPD paragraph 6.18 – does it mean one building or a block in the American sense, a group of buildings?
- 6.72 A respondent felt paragraphs 6.4 and 8.7 needs stronger word than "inform" when referring to building materials to be used.
- 6.73 A respondent raised concern about the lack of reference to Secured by Design (SBD), noting that safety and security measures can be included in the design and layout of buildings and public areas, keeping residents, workers and visitors safe.
- 6.74 One respondent considered that Guidance Note 3 should include whole life costing and maintenance, residual design risk, decommissioning requirements. Design scrutiny should include construction engineering.

Transport

- 6.75 Orpington 1st noted that while existing north - south connectivity is good, the town's connectivity east-west is lacking, and as the town grows, additional public transport and sustainable transport options will be needed to alleviate the need for more private cars. They considered that car free developments should be encouraged and prioritised over the building

of additional car parks as we must think beyond the here and now and build for the future, preparing to be less reliant on private vehicles.

- 6.76 Conversely, a number of other responses questioned the references to car free development stating that it is confusing and out of place. Several respondents stated that public transport is weak and therefore adequate parking should be provided.
- 6.77 A number of respondents noted the need to protect existing parking provision and the need for more parking, including better disabled parking, to ensure that the town centre will still attract visitors. More underground parking was suggested as an option. There was concern that new development would exacerbate parking issues.
- 6.78 One respondent suggested the provision of more parking outside retailers (referred to as 'park and pop').
- 6.79 One respondent suggested reducing car parking to one side of the high street to help with pollution and safety. They also noted that if the bypass width was increased this would reduce the stress on the high street.
- 6.80 Orpington 1st stated that commercial vehicles need well-located loading bays and will require electric charging posts in the future. They and other respondents stated that increased pressure from delivery vehicles, Uber trips, etc, need to be fully understood and properly catered for.
- 6.81 A local group suggests changes to paragraph 4.14 to be more ambitious in the aim to promote healthy streets and encourage sustainable modes of transport. The group made a number of suggestions to achieve this, including:
- completing the shared cycle route along Cray Avenue to Carlton Parade as a priority;
 - reviewing cycle route through Priory Gardens with stakeholders;
 - upgrading the footpath between Old Priory Avenue / Bark Hart Road beside Lych Gate Road to Homefield Rise to a shared foot/cycle path, as an alternative route to the High Street, incorporating the link to Lancing Road;
 - adding alternative routes avoiding Knoll Rise to connect with LCN22 on Lynwood Grove, e.g. Broomhill Road, Keswick Road, Stanley Road, Lucerne Road.
 - the potential for a cycle route linking Crofton Road cycleway, via station platform underpass and upgraded footpath to Hillview Crescent, Mayfield Avenue, Knoll Rise to High Street.
 - protected/segregated cycle route to negotiate War Memorial Roundabout to enable safer cycling to the High Street.
 - segregated/protected contra-flow cycle route avoiding the one-way system towards Carlton Parade.
- 6.82 A local group noted that the area around Orpington Station is dominated by vehicle traffic, associated emissions and noise, with negative impacts on walkability, exacerbated by often narrow, uneven and poorly maintained footways. The group and a number of other respondents consider that improving the public realm in partnership with Network Rail / Southeastern should be a priority commensurate with Orpington's standing as a Major Town Centre, in addition to improving active travel routes between the Station and High Street including the walking / cycling route from Crofton Road and the station forecourt via the platform underpass and Station Approach, upgrade footpath to a shared path linking up with Hillview Crescent and Mayfield Avenue to Knoll Rise (LCN22).

- 6.83 A number of respondents suggested that the PTAL rating of 4 (moderate) in the area of the Walnuts should be stated in the SPD. One suggests that the PTAL for each character area is highlighted, and that the Council ensure the correct parking allocation in applications.
- 6.84 One respondent recommended that future planning applications are rejected because of potential traffic impacts. Another suggested that suggests that road congestion should be a limiting factor to the size/density of future housing.
- 6.85 A number of respondents raised the issue of traffic congestion, and suggested this might worsen as a result of new development.
- 6.86 Orpington 1st noted that the transport links to London are a major attraction for businesses and residents locating or relocating to the town centre; they fully support a vision to continue to improve the station as a transport hub with associated infrastructure, so it is a vibrant and welcome access point that can integrate more effectively with the surrounding area and town centre. There should be opportunities to expand and modernise the site with additional associated businesses, and services that complement the transport hub.
- 6.87 Orpington 1st also note there is opportunity to showcase the significance that the railway had in the history of the town and to incorporate Crofton Halls and the Crofton Villa into the story, offering a more attractive destination.
- 6.88 Several respondents raised the need for better bus routes, including routes that are fully accessible for disabled people.
- 6.89 One respondent noted that Orpington is a major shopping venue for a rural catchment with poor public transport (Downe, Chelsfield, Knockholt) so driving is the only option.
- 6.90 One respondent suggested that traffic in the high street could be reduced by making it one way, or increasing pavement area. They also suggested proper cycle paths and a bike hire facility.
- 6.91 Another suggested that the development of the Walnuts includes a road from the high street to Lych Gate Road so that the high street can be pedestrianised, and buses can drop off near the walnuts development.
- 6.92 Several respondents suggested that the High Street should be fully or partially pedestrianised, some recognising that it would need careful consultation with the residents who would be affected, while a number of others objected to the idea of pedestrianisation entirely.
- 6.93 One respondent suggested closing the High Street to general traffic and only allowing buses and disabled drivers, another suggested restricting high street traffic to electric vehicles, cycles and disabled badge holders.
- 6.94 Another respondent stated that Orpington needs good road access and that road access should take priority over cycle lanes that are often underused.
- 6.95 Conversely, one response states that buses should be removed from the town centre because they are contributing to very poor quality air. They suggest a bus terminus in Gravel Pit Way,
- 6.96 A local group considered that the redevelopment of The Walnuts and Market Square should consider other options including extending footprint over Lych Gate Road (service road) to reduce severance.

- 6.97 A local group support provision of secure, safe public cycle storage to enable active travel and support the economy, and take account of additional security concerns during the evenings.
- 6.98 A local group considered that the main approaches to the High Street create severance and are often barriers to active travel, e.g. A223 Sevenoaks Road, A232 Station Road / Spur Road, A224 Cray Avenue / Court Road, due to volume and speed of vehicles. The group suggested that a 20 mph speed limit should be extended from High Street to cover surrounding areas where residents live unless there are segregated/protected footways and cycleways. The group favours through traffic being directed to via Spur Road to reduce traffic in High Street.
- 6.99 Commenting on the guidance in the Village sub-area, a local group suggest that filtering through traffic away from Church Hill would enhance the approach to All Saints Church; and question the necessity of one-way system around Chislehurst Road, Goodmead Road and Perry Hall Road and whether the High Street could revert to two-way traffic (or alternatively would a contra-flow lane for cyclists along the High Street be feasible).
- 6.100 The same local group made further suggestions to improve cycle route options by adding a cycle contra-flow to the one-way section of Augustus Lane, and onwards via Berwick Way through access road to High Street at mini roundabout.
- 6.101 Several respondents suggested that proposed new cycle lanes must be subject to consultation.
- 6.102 A local group think the Council should review on-street parking provision to create a healthier high street for all; prioritise sustainable transport and convenient Blue Badge parking.
- 6.103 A local group commented on access to the station, noting that better connectivity to the High Street is essential, and priority should be given to creating attractive, healthy and safe walking, wheeling and cycling routes. The group suggests alternative routes to the station via Broomhill Road and Knoll Rise to Mayfield Avenue / Hillview Crescent and footpath to Station Approach could be significantly improved for inclusive mobility.
- 6.104 One respondent considered that there is enough connection to the station, the issue is the hills to the west, as these are challenging for most people. Respondent suggested provision of more frequent 'hop-on' buses.
- 6.105 Several respondents suggested relocating the pedestrian crossings at the war memorial roundabout to avoid congestion at the roundabout.
- 6.106 There was also a suggestion to replace the roundabout on the A224/Warren Road with traffic lights and redesigning the bus stop/cycle lane outside Orpington Station.
- 6.107 A local group welcomed the opportunity for appropriate development along Gravel Pit Way and active travel improvements to Priory Gardens, and suggested that Gravel Pit Way could become the primary car access road to town centre and parking to relieve the High Street, with through traffic directed via Spur Road.
- 6.108 One respondent suggests that Gravel Pit Way could be used to reduce traffic through the south High Street. It could facilitate the pedestrianisation of the south High Street,
- 6.109 Several respondents commented on train frequencies, with requests for sub-15 minute waiting times and a number of comments stating that fast trains to London, Kent and Hastings should be retained.

- 6.110 One respondent requested new Tram and Tube links to Croydon, questioning why should network rail have the monopoly. Another respondent suggested extending the Tram line from Beckenham to Orpington.
- 6.111 One respondent suggested a cable car/skyway to link the station and historic Crofton area to the eastern carpark and provide a real wow factor.
- 6.112 A local group suggested that the SPD should scope town centre public transport hub, and shuttle services between High Street and Orpington and St Mary Cray Stations, and better, more flexible services to rural villages and amenities, emerging developments such as at Fort Halstead, and links into Kent.
- 6.113 There were several negative comments regarding the new cycle lane to Orpington Station. One respondent noted that buses to Orpington Station can sometimes take 20 minutes due to the impact of new cycle lanes.
- 6.114 One respondent stated that there should be more pedestrian routes to the station away from the busy road to encourage more people to walk to the station.
- 6.115 Some respondents sought a commitment to increase electric vehicle charging points and the scrappage scheme for diesel cars before imposing ULEZ charges, and others advocated green public transport. One respondent specifically highlighted 20mph speed limits and the introduction of woonerf principles where streets are designed to be social spaces not just for vehicle use, whilst another raised concerns that a 'Living Streets' approach may funnel traffic down particular routes.
- 6.116 Several respondents raised the need for adequate EV charging points as part of new development. One respondent suggested that all the buses should be converted to electric.
- 6.117 TfL suggested referencing several of the London Plan policies in various parts of the SPD and also suggests adding 'transport' to planning obligations that may still be sought on specific schemes. TfL points included:
- Suggestion of specific reference to reducing car dominance in the town centre, as well as a requirement for new developments in the town centre to be car-free. They state that explicit reference to car free development is required in major town centres (London Plan Policy T6)
 - Amendment to the vision which adds that walking and cycling will be prioritised and traffic impacts on public spaces will be minimised.
 - Suggestion that the draft SPD also considers sustainable freight and deliveries and provides support for consolidation of deliveries and servicing to town centre businesses, in line with Policy T7 of the London Plan. TfL would welcome reference to Policy T7 Sustainable Freight.
 - Suggestion that the Council directly link sustainability and air quality with sustainable transport, as even with electric vehicles, reducing car trips and encouraging sustainable freight will improve air quality and reduce carbon emissions and embodied carbon in the transport network.
 - Consider measures to reduce car dominance and the creation of good quality cycle parking.
 - Reference to protection of bus movements on the High Street and Chislehurst Road as key bus corridors, and any redevelopment along these streets should seek to avoid and minimise negative impacts to bus operations, especially during construction.

Leisure centre

6.118 A significant number of respondents commented on the leisure centre, with many noting its importance as a community asset which provides important services to a diverse range of residents. A lot of respondents noted that the SPD has limited reference to the leisure centre and suggested additional guidance should be provided to help protect the leisure centre. Many respondents expressed concern that redevelopment would mean the leisure centre being closed for an indefinite period of time, perhaps permanently. Many note that the closure of the leisure centre will have adverse impacts on peoples physical and mental health and general wellbeing. Many would like to see its refurbishment rather than demolition.

6.119 Many of the responses relating to the leisure centre note that the new leisure centre must have facilities suitable for competitive swimming to enable swimming galas and other competitions to be held there.

6.120 The following points were suggested by respondents as part of comments related to the leisure. The points cover things respondents would like to see retained, suggestions for new and improved provision and general comments noting other concerns:

- Need a new leisure centre.
- Leisure centre should be the first thing to be completed as part of any redevelopment.
- Current leisure centre is tired, old fashioned, outdated and in need of modernisation.
- A refurbished leisure centre should be at the heart of the walnuts development.
- Refurbishment, not rebuild, would be cheaper and less disruptive.
- The existing pool could have a 25m boom.
- Leisure centre should be refurbished using CIL.
- Larger centre to meet demand from new residents.
- Larger swimming pool; needs to be a decent size not a paddling pool.
- Provision of large learner pool in addition to main pool.
- Retain 33m pool.
- Explore option of a 50m pool which would make Orpington a swimming hub for the southeast.
- Retain and improve soft play.
- Retain gym/hall facilities.
- Provide racquet sport facilities.
- Pool has a hoist and is used for GP referrals.
- Need for hydrotherapy facilities.
- Don't lose facilities for children and families.
- Include activity centre for children.
- Improvements aren't worth 3-5 years of closures.
- SPD should resist even a temporary loss of the pool.
- New pool should open before current one closes.
- Need a pool that allows the Ojays to hold Gala events with enough seating for spectators, and viewing gallery.
- Would like staff at the walnuts to retain their jobs.
- Would like to see a new larger multi-purpose leisure facility built before decommissioning the existing leisure centre so that there is no effective loss of swimming provision or impacts on competitive swimming.
- Need to consider alternative sites such as Goddington Dean to provide cohesive and joined-up provision across multi-sports, swimming and leisure.
- Area bound by Spur Road, Gravel Pit Way and Homefield Rise suggested as an alternative site.

- The Walnuts centre could be extended to about 8 storeys and the leisure centre could be in a basement part of that.
- Consider alternative provision during construction – examples given include use of St. Olaves Pool, provision of a temporary pool in the vicinity.
- Loss of the pool would destroy the Ojays swimming club.
- Loss of leisure facilities will have great impact on community health and wellbeing
- Leisure centre provides a sense of community and social life for older people.
- Loss of pool would have adverse impact on the economy.
- Need more parking provision for the leisure centre.
- Combining both housing and leisure will likely create many issues for any community, due to early and late open hours and the noise.
- No loss of changing facilities.
- Present centre lacks class facilities for certain areas, difficult to book some classes as in high demand, hence new centre should include improved facilities.
- A diving pool would attract more people.
- Suggested additions to leisure centre to attract families include escape room, inside putting, bowling alley, ice rink, children’s adventure playground, nursery, roller skating.
- Temporary ice rink and pallet park at r/o leisure centre had positive impacts.
- Leisure centre is currently in poor condition and there is an opportunity to improve this.
- The leisure centre should remain affordable and Council run.
- There should be a full consultation on the redevelopment of the leisure centre.
- There should be explicit mention of leisure centre in paragraphs 3.9 and 6.4 as a key parameter.
- A vital public asset like the leisure centre should be a separate planning issue and not dependent on development.
- A new leisure centre must comply with Policy 20 of the Local Plan i.e. no loss without alternative enhanced provision.
- Should be accessible to all residents and fully accessible for disabled people.
- Entrance could be more prominent from high street side.
- The leisure centre is no longer fit for purpose and has passed the point where refurbishment would be appropriate.

6.121 ‘Nuts to the Walnuts’ and another respondent note that no Council led independent public consultation about the future of the leisure centre or the Saxon Centre has been carried out. Relying on public feedback on planning applications or to the draft SPD is no substitute for a proper consultation. Considering the leisure centre is a public asset used by around 19,500 people each month and the Saxon Centre is a crucial community provision, a public consultation is vital. The group consider that the SPD should insist that any development which would impact on the leisure centre and the Saxon Centre be subject to a Council led independent public consultation taking place; and that the consultation should take place before any land deal is formally agreed with a developer, otherwise the consultation will be seriously compromised. This consultation should liaise closely with relevant user groups and follow Government principles for carrying out consultations - <https://www.gov.uk/government/publications/consultation-principles-guidance>. ‘Nuts to the Walnuts’ consider that the SPD should state that consultations should include the following options:

- the refurbishment of the existing leisure centre over time
- the building of a new leisure centre, next to the old one, before demolition
- the building of a new leisure centre, near the town centre, before demolition.

- 6.122 'Nuts to the Walnuts' state that the SPD should insist that developers give full details at the outset about how they will ensure that the town's leisure facilities will not be interrupted during construction.
- 6.123 'Nuts to the Walnuts' also consider that the SPD should insist that the Council follows the guidance set out in GN8 and insist on a retrofit approach in respect of the redevelopment of the leisure centre. They note that this is the option favoured by the overwhelming majority of this group's members in their Facebook poll – 87%.
- 6.124 'Nuts to the Walnuts' suggest that the Council should invest some of its own capital to refurbish the leisure centre to support its own 'retrofit first' approach.
- 6.125 Orpington 1st noted the importance of leisure uses as part of place shaping, stating that the leisure sector has huge advantages for the social wellbeing of residents and visitors, as well as an opportunity to realise commercial benefits. Orpington 1st fully support the opportunity for the redevelopment of the current provision and prioritising the expansion of the important leisure market. They would like to see a stronger message about retention of services within the town centre as the BID is strongly against any move to relocate the main leisure centre away from the town.

Housing inc. Affordable Housing

- 6.126 'Nuts to the Walnuts' commented on the number of flats that they considered suitable in the area, based on a Facebook survey. The group (and other respondents) considered that no more than 250 accommodations should be built in the centre of Orpington, with all quotas for social, accessible and affordable housing met by developers.
- 6.127 A number of respondents stated that there should be a mix of unit sizes, with gardens and parking. However, there are differing views on what the mix should be. For example, many note that 1 and 2 bed units do not meet need. One respondent stated that there are too many expensive retirement flats being built and we need affordable flats for the young of Orpington. One respondent stated that Orpington needs more houses, not flats and another stated they would like to see a mixture of maisonettes, low rise flats, small, terraced houses and some bigger homes for families.
- 6.128 One respondent suggested that any development should be sympathetic to the existing housing stock in the area and provide a mix of accommodation, with some having private gardens and close access to green areas.
- 6.129 A number of other respondents commented generally that too many homes are being proposed for the area, and this will result in overcrowding. One respondent states tension will become explosive given the mix of tenures living so close to each other.
- 6.130 Some respondents accept that there is space for some housing in the town centre, but others questioned why any housing was needed in the town centre at all. One respondent suggested that housing should be provided in out-of-centre locations with park and ride services introduced to enable access to the centre.
- 6.131 Conversely, some respondents noted the need for new homes, including affordable housing, small/medium sized family homes and keyworker housing.
- 6.132 One respondent disagrees that Orpington should have "medium" levels of residential growth on the basis of the London Plan – such matters should be local matters and not matters for the Mayor of London.

- 6.133 One respondent states that Orpington has met its housing target. Another respondent states that Orpington should not be responsible for meeting most of Bromley's housing quota. A few respondents make reference to the already permitted residential units / units under construction within the town centre which gives credence to reducing the proposed number of units.
- 6.134 TfL state that given the high PTAL in the Orpington Station and York Rise area, TfL would support higher density development commensurate with the excellent connectivity in this location.
- 6.135 A number of respondents state that housing density should be design led and focus on quality not quantity, Others suggested that housing should be low density.
- 6.136 Several respondents expressed concerns that new flats will end up being 'buy to let'.
- 6.137 Some respondents suggested that a proportion of new homes should be ringfenced for sale to local residents or UK residents. One notes that the sale of homes to overseas investors should be avoided.
- 6.138 Orpington 1st stated that businesses welcome an increase in the resident population and are appreciative of the economic and social benefit created by people living in the town centre. They fully support the mixed use of valuable space to create homes. They go on to note the need to attract younger customers who appreciate the advantages of living in a central location, and are keen to use facilities and support the town centre businesses, bringing further vibrancy, creativity, and economic benefit. This is particularly important given the town's aging population. Towns are for people, and they encourage and welcome new residents into the neighbourhood.
- 6.139 'Nuts to the Walnuts' and other respondents suggested that the Council investigates bringing vacant dwellings in Bromley back into use, to provide much needed homes ahead of approving mass building in Orpington town centre. One respondent suggests that the SPD should address the under occupation of housing and the need to downsize.
- 6.140 The presence of homeless people near Tesco was noted by one respondent who suggested that there should be assistance for them.
- 6.141 One respondent suggests looking for alternative sites for housing in the Green Belt. Another respondent stated that there are other areas away from Bromley where housing could be achieved. Releasing brownfield sites to allow people to live in houses with gardens was suggested.
- 6.142 'Nuts to the Walnuts' suggested that the SPD include the number of homes, including new homes built in each area for every year during the target period to date, 2019/20 – 2028/29. In this way Council members can judge the degree to which some areas are being over developed.
- 6.143 One respondent suggested there was potential for flats above shops on the High Street up to Priory Gardens, while another noted potential for further housing off the High Street.
- 6.144 Another respondent suggested limited housing development at northern end of the High Street in one way system might be suitable.
- 6.145 One respondent stated that the high street should focus on providing retail and leisure facilities with limited housing above shops. One respondent suggested that the empty shops could be redeveloped for housing or flats.

- 6.146 One respondent suggested that in Orpington West existing housing and public areas could be enhanced with newer built accommodation similar to Lewisham where the old housing was replaced with a very compact and useful regeneration sandwiched between the railway lines
- 6.147 A developer/landowner noted that, whilst draft Guidance Note 10 encourages developments to optimise site capacity this is balanced with a focus on quality of place over quantum of development. Developments, under Policy D3 (Optimising site capacity through the design-led approach) of the London Plan, should be design-led. It further outlines that the optimum development capacity of a site should be determined through applying a design-led approach. This is a step change from the previous London Plan which included a density matrix. This approach was considered too prescriptive and therefore the design-led approach allows for applications to determine this. As such, LBB must ensure that developments within the Borough and the Town Centre make the most efficient use of land and seek for density to be design-led rather than prescriptive and restrictive, especially given that the LBB cannot demonstrate a five year housing land supply. In light of this, the respondent requests that LBB review guidance note 10 to include reference to ensuring within sustainable locations, such as Town Centres and Opportunity Areas, density should be optimised. The current wording fails to align with the requirements of the NPPF, specifically paragraph 16, which requires plans to be prepared with the objective of contributing to the achievement of sustainable development. It also advocates the refusal of planning application that do not achieve sustainable development.
- 6.148 One respondent stated that densities should be reduced where possible to enable the greening and increase of public spaces and facilities as required elsewhere in this document. 'Optimise' does not mean dense high-rise buildings especially residential as this distorts and significantly changes the 'quality of place'

Environment and air quality

- 6.149 A number of respondents commented that sustainability, a changing climate and environmental impact should be at the heart of any plans and developments and sought an assessment of how the plan is compatible with these issues. This included homes built to last which offer good a lifestyle for residents. A number of sustainable features were suggested including:
- green roof/walls.
 - low carbon & passivhaus standards.
 - sustainable construction and materials.
 - sustainable drainage (SUDS),
 - tree planting & landscaping],
- 6.150 Orpington 1st consider that the retention of greenspace surrounding the town centre is a priority alongside the creation of additional spaces within the footprint of the town centre. They support the intensification of development with a town centre first policy to avoid the erosion of greenspace, and would like to see the Grade II listed Priory Gardens prioritised as an opportunity, to create a celebrated visitor attraction.
- 6.151 A comment from 'Nuts to the Walnuts' suggests that the SPD requires proposed developments to provide additional outdoor space for the wider community as well as private outdoor space for new residents.
- 6.152 A number of respondents raised the need for more open and green spaces, trees, planters, shrubs, flowers and planting in the town centre. Some respondents noted that additional development in the town centre will increase pressure for such space. One respondent felt that references to increasing green infrastructure could be more committal. Guidance note 7

for example - "should explore opportunities" - this needs to be stronger, mandatory unless there's an impossible barrier to it.

6.153 Many respondents highlighted the health benefits (mental and physical) which come with open space and opportunities to relax and / or exercise, commenting that more natural spaces would benefit the health and wellbeing of the community. Specific references made to the lessons from the pandemic, supporting the view that access to space, light and nature should be preserved (especially as more people work from home) and local facilities enhanced sensitively and sustainably

6.154 A local group suggested more greening on Station Road to help mitigate vehicle emissions. Other suggestions for new greening were put forward:

- Underused road space should be converted to public amenity space / parks (e.g. Alfred Place Gardens in the London Borough of Camden).
- Site Allocation 11 in the Eastern Edge Sub-Area and Site Allocation 12 in the Orpington Station and York Rise Sub-Area -SPD should state that green space and trees at both sites should be retained and improved.
- SPD should contain a policy to ensure any estate regeneration 'infill' schemes or new housing developments do not leave residents with inadequate provision of green and communal open space. A minimum equivalent of green space should be found to replace any which will be lost and more generally there should be a target provision of green space per person.

6.155 Some respondents suggested that greening is incorporated into new buildings, for example green balconies. Some respondents noted concern about the safety of roof gardens on tall buildings.

6.156 There was broad support for retrofitting with a number of respondents considered that the refurbishment of existing buildings instead of rebuild, with the aim of reducing carbon footprint and pollution, would be much more suitable and environmentally friendly suggesting in particular that the college, leisure centre and Saxon Centre all lend themselves to a retrofit-first approach to reduce impacts from existing embodied carbon (a cheaper and greener option). Some respondents suggested that there should be a stronger requirement for retrofitting.

6.157 Several respondents suggested that solar and district heating should be considered as part of new development.

6.158 A local group suggested that development in town centres and use of brownfield land should be prioritised so there is less pressure for development in the Green Belt.

6.159 A number of respondents noted the potential for an increase in air pollution as a result of new development and increased traffic; the potential impact of this increase was raised by several respondents, which included impacts on people with lung conditions. Other respondents specifically referenced the need to improve air quality through a reduction in motor traffic along the high street which would also enable a more reliable bus service. One respondent highlighted potential traffic issues suggesting that free flowing traffic is better than slow moving traffic whilst another raised concern regarding vehicles parked up on pavements with engines running, suggesting this should be penalised.

6.160 The Environment Agency noted that there is no reference to groundwater sensitivity and recommended that reference is made to ensuring water sources are not contaminated by polluting. They also recommended a reference to Local Plan Policy 118 as part of relevant policy and guidance for GN 8 to ensure that the prevention of controlled water. Another

representation highlighted that underground streams run through the area and raised concerns about potential sink holes (noting some have occurred in the area).

- 6.161 A local group noted that the ponds where the River Cray rises in Priory Gardens are designated a wetland SINCC. One respondent felt that the River Cray could be exposed to give riverside walks.
- 6.162 Several respondents noted that biodiversity must at the very least be maintained, raising concern about the potential impact of development on local wildlife / bird life and a variety of habitats – referencing colonies of bats, clans of badgers and Peregrine falcons nesting on top of the college (all protected in law). Other wildlife also referenced include at-risk amphibians, hedgehogs that require natural corridors, and pollinating insects which need native wildflowers. The impact of tall buildings on the flight paths of birds was also highlighted.
- 6.163 A respondent recommended that SPD Guidance note 14 should specifically reference that development should achieve at least 10% Biodiversity net gain.
- 6.164 A respondent suggested the enabling of wildlife areas which aren't overly curated, whilst another suggested a reduction in grass cutting. grass verges left to rewild and an end to the use of pesticides and herbicides.
- 6.165 A respondent suggested that numbers of Canada / Greylag geese at Priory Gardens should be controlled to allow a wider variety of smaller waterfowl to flourish. Also suggested areas be set aside for plants and flowers which would actively encourage more pollinators and wildlife.
- 6.166 A respondent felt that the Conservation area and should be protected as such for the wildlife, and another highlighted the desire for more natural ground covering.
- 6.167 The inefficiency of the housing stock (heating) was highlighted by respondents along with energy costs and fuel independence and security, and concerns for creating energy efficient living accommodation for new and existing residents.
- 6.168 Some respondents felt that new development should meet or exceed current energy efficiency standards and be carbon neutral in operation whilst another suggested that tower blocks in particular are proven to have greater impact on carbon emissions, as low/zero carbon development was not possible because costs of fire mitigation, raise build costs and solar panels would increase height.
- 6.169 Respondents suggested increased focus on local, low-cost power flagging wind farms, solar power and Small (Modular) Nuclear Reactors and geothermal heating project
- 6.170 Respondents raised concerns that 'Infrastructure Delivery' (paragraph 2.15) does not mention capacity to dispose of all water to meet the objective of improving the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised, noting that the torrential rain from recent storms flooded streets. A respondent highlighted that the High Street paving regularly floods and is uneven.
- 6.171 One respondent raised concerns in respect of paragraph 5.31 that overshadowing should not be addressed through carbon off-setting agreement.

Commercial uses (retail, leisure, office)

- 6.172 Orpington 1st stated that the employment opportunities provided by the town must be central in the consideration of new development. The links with Biggin Hill and the Cray Valley

Corridor should help shape and guide the type, size, and location of commercial premises. Light Engineering, Science and Technology, Aviation and its associated businesses, are all opportunities to provide Orpington with a further USP. Building the appropriate infrastructure to support business development in these sectors, and appropriate accommodation to attract staff, will be essential in bringing and sustaining economic growth to the area.

- 6.173 Orpington 1st stated that all new development should reference the current provision and mix of uses, and that, to function more affectively, the outdated and costly district system must be replaced with independent services. They also stated that improved digital infrastructure is a priority for existing as well as any new development.
- 6.174 Orpington 1st considered that much of the current portfolio of premises is unfit for purpose and needs replacing, but whilst the end use of commercial space is still being reviewed at a national level as well as local, future proofing capacity should be a requirement of planning. They added that High Street facing commercial units or spaces provide excellent visibility, access and improved security, so the relationship with the High Street should be a consideration in planning.
- 6.175 There was general concern regarding the loss of (fully functioning) units (in the now withdrawn planning application). A number of respondents note that the small units proposed won't attract large retailers. One respondent stated that the proposed retail units are too small and will drive larger retailers away and won't address the demand for retail in the area. Others state that the replacement shopping centre should include a range of unit sizes large enough to attract popular national retailers in addition to smaller units to attract independent retailers and small local start-ups.
- 6.176 One respondent questioned how the planned programme for the development addresses closure of existing business units and the consequential redundancies of those who work in them; and questioned whether the proposed replacement retail units would be more or less affordable for occupiers.
- 6.177 One respondent raised the potential impacts that the proposed development would have on the Odeon cinema.
- 6.178 A number of responses agree that the Walnuts shopping centre needs updating, however they do not agree with the current plans.
- 6.179 A significant number of responses stated the need for a stronger emphasis on retail and leisure uses. Some respondents noted the need to retain existing shops while others considered that the Town Centre needs better/decent/more variety of shops, in terms of the type of shop, the nature of ownership/operation (e.g. independent, family run) and also shop sizes (e.g. small shops). 'Nuts to the Walnuts' stated that the SPD should make it clear that if the Walnuts Shopping Centre is demolished new retail space should equal or exceed the floor area which has been lost. Another respondent suggested that there is continued need for an indoor shopping centre, whilst another questioned the need for an indoor mall.
- 6.180 One respondent highlighted that Orpington is a Major Town Centre and it should be unambiguous that residential use is a complementary function, not a primary one.
- 6.181 Some respondents were keen to see small interesting shops rather than large brand names, whilst others were keen to see large retailers encouraged to return. Many respondents were keen to see a mix of small, medium and large unit sizes / retailers, including units with the ability to convert/subdivide (adapt easily to change). One respondent noted that the bigger retailers can support the smaller shops and businesses.

6.182 Many respondents suggested particular named businesses or types of operators that should locate or remain in the Town Centre; this included:

- supermarkets
- restaurants
- clothes/fashion/designer shops
- shoe shops
- bingo halls
- gaming shop
- bookshops
- purveyors of everyday goods
- business (office) use
- department store
- craft shops
- independent shops
- shops selling local fresh produce
- local information centre
- community hubs
- somewhere to entertain teenagers, e.g. youth clubs
- local accessible shops for the elderly
- bowling alley
- ice rink
- outdoor gym
- performing arts centre
- children's adventure playground
- cinema
- butcher
- bakers
- greengrocers
- farmers market
- artisan businesses
- escape room
- inside putting
- fish monger
- record shop
- council offices so people can pay bills
- police station
- weekly market
- internet café
- outdoor café culture
- wine bar
- mini brewery
- gallery
- exhibition space
- events square
- antique shops
- pottery
- theatre
- citizens advice bureau
- job centre
- space for outside dining

- 6.183 Some respondents felt that more variety of uses would improve a perceived issue with vacancy rates. Other respondents suggested that the Town Centre looked tired and dated, and could do with a freshen up.
- 6.184 Some respondents noted that small local retail as a key part of the 'small Kent town' character of Orpington.
- 6.185 Conversely, many respondents identified particular types of retail or leisure use which should be limited, as they considered such uses were unnecessary or that there were too many of said uses currently located in the area. The particular uses identified included:
- food shops
 - cafes/restaurants
 - boutique shops
 - gambling/betting shops
 - charity shops
 - funeral parlours
 - nail bars
 - estate agents
- 6.186 Some respondents considered that the town centre did not need any further retail. One supported reducing the retail offer in replacement of leisure facilities. Another states that they are not against reducing the number of retail units and floor space in favour of housing and added that many retail units have storage space which is superfluous to the modern business model. One respondent considers the high street is too long with too many charity shops and empty units; they suggested concentrating retail between Tesco and the Walnuts to free up the northern end for housing.
- 6.187 One respondent considered that the Council should get rid of Tesco as it has ruined Orpington and closed lots of shops, whilst another notes that Tesco was huge but benefitted local residents.
- 6.188 Orpington 1st noted that the town has a rich history, including The Priory and Crofton Villa, which should both be celebrated and maintained to a high standard. Strong links to surrounding tourist attractions such as Down House and Biggin Hill Memorial Museum should be recognised as an economic opportunity, and planning should better reflect the town's position as a gateway for increasing tourism.
- 6.189 Orpington 1st also note the growth of festivals in Orpington which attract audiences from both in and out of borough. Planning should recognise the importance of these events and seek to support their growth, with suitable premises and infrastructure for theatre, art, and performance. Orpington 1st welcomes the new cultural focus of the council and would like to see more support given in the SPD to ensure that the town centre provision reflects the major town centre status of Orpington.
- 6.190 Some respondents raised the need for a decent market, including a suggestion for a permanent marketplace under a covered plaza.
- 6.191 Orpington 1st noted that the current market and event spaces are hidden from view, reducing the benefit of activation to the wider town centre businesses. New developments should improve permeability into the centre and provide additional outdoor spaces for community use.
- 6.192 Various respondents noted the need for more investment in the Town Centre and there was some suggestion of lowering business rates to encourage new businesses. One respondent

suggested that Bromley should invest its spare funds into the area and that empty shops should be refurbished. Another suggested that the Council should provide financial assistance offering low affordable rents and rates encouraging proprietors to Orpington.

- 6.193 Orpington 1st advocated the development of closer links with London South East Colleges to ensure that Enterprise, Catering and Hospitality, a key component of the college's provision, are further developed to support a circular economy. They noted that the town has a well-established hospitality sector which would benefit from additional leisure provision to complement it. As customer behaviour changes, and the requirement for traditional retail space diminishes, and the experience sector expands, appropriate and affordable premises to support this growth needs to be made available. They consider that larger units are often required to accommodate these emerging trends, so planning flexibility within spaces is essential.
- 6.194 Orpington 1st also support the opportunity to redevelop part of college premises for mixed use. High quality, flexible, and digitally advanced workspace - alongside conference facilities and student accommodation, would all contribute to the town's enterprise offer. One respondent stated that they would like Orpington to have an adult education program for adults.
- 6.195 Several respondents noted the need for better disabled access to shops.
- 6.196 A limited number of respondents suggested retaining the existing shopping centre as they liked shopping there.
- 6.197 A developer/landowner discouraged LBB from adopting the approach advocated in guidance note 17, i.e. utilising planning conditions to remove the provisions of Use Class E and to remove specific permitted development to protect the vitality and viability of the town centre rights. Whilst it is acknowledged that the LBB wish to prohibit the change of use away from certain uses which now fall within Use Class E, Use Class E was introduced to improve the viability and vitality of town centres and allow high streets and town centres to respond to the changing market demands. Restricting such ability for the high street and town centre to react to the changing needs of the local populations and furthermore market demand, would hinder the success of the town centre's regeneration and would impede the vitality and viability of Orpington. The respondent requests that this Note is reviewed to allow for flexibility of uses within Class E.
- 6.198 A number of responses make reference to the requirement of Local Plan Policy 92 to preserve and enhance active frontages.
- 6.199 One response noted the need for recognition that internet shopping will continue to increase.

Public realm, permeability and connectivity

- 6.200 Orpington 1st consider that clearly identified and funded management for the sustainability of public realm and public/private spaces is an essential component of good town centre planning. They note that the town requires improved infrastructure to accommodate both indoor and outdoor events; and that spaces should be designed with consideration for their end use, with appropriate services – electricity, water, hard standing, level ground, access, toilets - installed. Such spaces are lacking in the current Market Square and top terrace at the Walnuts Leisure Centre, compromising their use and hindering the ability of partners to activate the space without considerable additional cost and complicated logistics. Orpington 1st highlight that the positive benefits of well-designed and maintained public spaces are well documented for both businesses and residents, and state that they will continue to support the activation of these spaces, as it has done to great effect and for the benefit of the whole community over the last decade.

6.201 A developer/landowner supported guidance note 4 which requires development proposals to establish a clear hierarchy of permeable routes and spaces ensuring that new connections correspond with existing routes to promote greater ease of movement and improve wider connectivity.

6.202 Some respondents sought improved / additional green spaces connecting the southern end of the town to the Cray Valley. Others stressed the need to improve and link open spaces to residents, specifically improving environmental links, e.g. cycleways, walkways and promoting walking across Orpington with signposting (e.g. distance and time to destination). A respondent was pleased to see references to 'greening', pedestrian access and sympathetic good quality 'tidying up' of several parts of the whole area

6.203 A number of public realm issues were identified, with some respondents also suggesting public realm interventions/improvements to tackle these:

- Improving the environment of the High Street and making it a more pleasant place to spend time.
- Street furniture / footpath width / paving & kerbs in Orpington high street difficult if using mobility equipment / with visual impairments.
- The existing Walnuts car park not easily accessible to wheelchair users.
- Need to improve accessibility of the village area.
- Footbridge over Lych Gate Road is not accessible.
- New paving around the Odeon cinema has been poorly installed.
- Western Area existing flooring/paving should be remedied as this is uneven.
- Lifts for the Walnuts car park are not accessible.
- Proposed access to public toilets down narrow corridor (as part of now withdrawn planning application) is a challenge for those with disabilities.
- The footpath heading Northwest from the station parallel to the tracks towards Petts Wood.
- Better pathways along Gravel Pit Way with greenery and a crossing linking site 11 to Market Square with special consideration given to the impact on residents of Lancing Road and Spur Road of traffic.
- Wider pavements and greenery along Station Road.
- The pathway from the Knoll to the station should be improved and clearly signed
- Improved signage and lighting across the town centre.
- Integrate the war memorial into the surrounding area with pedestrianisation incorporating the war memorial providing space for local community.
- A station square might enhance the Station setting.
- The subway which runs under the station does not seem to appear on the map in the SPD. The subway is dark, infested with pigeons, and unpleasant to walk through. An upgrade to the subway would be a welcome improvement.
- Improve kerbs (roundabout and high street / junction between Tubbenden Lane and Station Road) to improve safety and stop bus layout causing snarl up.
- A residents association highlighted 3 particular pedestrian crossing areas to address:
 - High St / Knoll Rise junction
 - High St / Homefield Rise roundabout
 - Homefield Rise / Juglands Rd junction

6.204 Several respondents raised concerns about guidance regarding the aim for improved pedestrian permeability across the town centre, including guidance note 12 and figure 4 which some respondents assumed was a proposal to create actual new routes which would involve the demolition of existing homes.

- 6.205 Several respondents noted the importance of retaining and improving open spaces, particularly Market Square and the existing space outside the leisure centre. The pallet park outside the entrance to the Leisure Centre was highlighted as a good idea. Various respondents drew attention to the public realm outside the leisure centre entrance, which they considered should be replaced elsewhere if developed.
- 6.206 One respondent questioned guidance note 7 and how space 'above ground floor level' can be inclusively accessible. A podium space is likely to be only for the exclusive use of residents/occupiers of that development. Public space needs to be easily accessible, so this basically should be at ground level.
- 6.207 Several respondents questioned whether the town centre should be a place to dwell, as set out in the vision.
- 6.208 A respondent felt that the town centre was currently easy to navigate but would become problematic with increased density, courtyards, places and squares.
- 6.209 A local group suggested integrating performance space within public realm, giving the example of the Scoop at More London.
- 6.210 A local group noted the potential to reimagine Homefield Rise public realm, reconsidering roundabout at junction with Lych Gate Road.
- 6.211 Concern was raised by several respondents about the potential for increased late night disturbance related to increased connectivity, potentially making quiet streets busier, noisier and more dangerous, especially for children.
- 6.212 Orpington 1st fully support the ambition to develop Gravel Pit Way and utilise the underused sites along this busy access road. They would like to see the traffic flow anticipated and planned for in order to avoid some of the current challenges in this area. New developments should also ensure visitors to the town have a positive first experience. The hotel drop-off at the rear of Juglans Road is an example of where there has been no consideration for a welcoming and well managed access.
- 6.213 A local group suggested that the SPD provide guidance for improving rear of High Street properties facing Augustus Lane and Berwick Road service roads.
- 6.214 Some respondents raised the need for more seating in the town centre.
- 6.215 A respondent suggested that the SPD talks of placing benches in roads leading to and from the station (e.g. 'places to pause' referenced in paragraph 8.18) but considers this would be totally out of character for existing, quiet residential roads.
- 6.216 One respondent felt that routes to Priory Gardens should be traffic free and specifically recommended no electric scooters.
- 6.217 A local group considers that much more could, and should, be done within the public realm to define and enhance the local Conservation Areas. Metal posts in the High Street pavements as the road narrows barely nod to the Orpington Priory Conservation Area - the historic heart of the town. Another respondent suggested improving and increasing existing signage "wayfinding clues" as this would clearly direct pedestrians to the existing paths.
- 6.218 One respondent considered that the reference to legibility in paragraph 4.15 is fairly pointless. The respondent added that maintaining and cutting back vegetation to clear existing signs

would help legibility, we only need to add what is required and appropriate and we already have the War Memorial and the College Building as clearly identifiable landmarks.

6.219 TfL recommended additional references to

- Healthy Streets (London Plan Policy T2), including indicators, particularly when referencing improvements to the public realm - inclusion of measures to improve the environment for active travel on the high street'
- Legible London' programme is extended to Bromley and new developments provide 'Legible London' signage and connect into the existing programme

6.220 'Nuts to the Walnuts' consider that the SPD should prioritise accessibility when designing public spaces and considering street layout. It should state that street furniture should not cause difficulty for disabled people navigating the town's pavements, particularly for visually impaired people and wheelchair users. The SPD should also emphasise the necessity of accessible public transport to existing and future attractions and facilities. These points were echoed by several other respondents who noted the need for better design and access for disabled people including wheelchair users.

6.221 One respondent considered that a reduction in street furniture would be an improvement for pedestrian movement, as there are a lot of sandwich board outside shops and the High Street narrows and widens at various points.

6.222 'Nuts to the Walnuts' consider that the SPD should state Councillors will thoroughly scrutinise development applications and reject any plans which do not genuinely improve the public realm and create safe and clean spaces.

6.223 One respondent referred to paragraph 4.14 and noted that there is not much evidence of 'well-designed streets' in the area.

6.224 One respondent welcomed paragraph 4.16 but would like it to go further, suggesting that the development of north-south connections should be part of a larger scheme to enhance the Cray riverway this would extend the route from its current southerly terminus at the museum right through the town to the war memorial along a traffic free route, with ultimate aim of a continuous traffic free walking route from the war memorial via the London loop to the newly opened England coast path at Crayford.

6.225 Several respondents noted that previous pavement widening has caused issues as it has made the High Street too narrow for traffic, and that it should be widened to enable smooth running of traffic to assist retail trade.

6.226 Several residents note that the Crofton Road cycle lane is unacceptable, noting that most cyclists still use the road, and related public realm planting is not cared for which does not demonstrate pride in the area. One respondent the cycle way needs to be removed and should be paid for by the consultants that developed it as they have a residual liability. Another respondent commented generally about under-used cycle lanes and suggested that road access for cars should have priority over cycle lanes.

6.227 One respondent considered that Stanley Road, Cyril Road and Oatfield Road should remain 'dead-end roads' and that Broomhill Road should not be widened.

6.228 Some respondents suggested the need to refurbish the High Street and suggested measures to improve the look of the public realm, including floral displays and more hanging baskets. A couple of respondents considered the northern stretch of the High Street to be uninviting and shabby and the area feels unsafe and needing to be renovated.

General comments

6.229 In addition to the topics above, a number of general comments were raised:

- A number of respondents questioned the use of certain terms and in some cases suggested alternatives. Some respondents advocated the use of Plain English. One respondent suggested that a glossary should be provided.
- A respondent referred to paragraph 1.6 and considered that reference to overlapping documents means less clarity and more opportunity for the intent to be uniquely applied.
- A number of respondents questioned the need for the SPD and suggested that it had only been prepared to facilitate the delivery of a now withdrawn planning application, with some respondents suggesting that the developer of said application had input into the drafting of the SPD or funded its preparation.
- Many responses stated that they supported regeneration or development in principle, but noted a range of caveats particularly around building heights and the scale of development (which are detailed above).
- A significant number of responses were direct objections to a planning application for a large mixed-use development proposal on the Walnuts site (now withdrawn). Many responses criticised the level of engagement with residents by the applicant and the accuracy of the consultation materials that were provided. One respondent noted that the application had no consideration of the Equalities Act, and should not have progressed to an application. The council needs to review and reinforce the planning department as a result.
- One respondent noted support for the SPD and the intensification of development around the high street, and noted support for the planning application proposals.
- Orpington 1st welcomed the SPD, noting that it is a comprehensive document, and a much needed and long overdue guide which will help attract and support essential inward investment. Orpington 1st noted that development is taking place without any coordinated plan or cohesive vision, and implored the local authority to show leadership, steering with confidence the economic growth of the town; enabling, not preventing, new build, working collaboratively and efficiently to ensure the highest quality of design and delivery, and enabling creative solutions which support modern trading requirements and improved social cohesion.
- Orpington 1st acknowledge the benefits of being located on the border of Kent (the London-Kent Gateway) but are clear that Orpington is part of Greater London, one of only 32 Major Town Centres in the region, and suggest that the local authority support businesses in promoting the town as being part of London. They would like to see greater clarity and emphasis being put on the town's location to prevent the misconception that Orpington is a small town in Kent. They add that the correct positioning and status of the town should enable officers to take full advantage of the opportunities and funding streams made available from the GLA, which can have a direct and positive impact on business and the community at large.
- One respondent suggested that the policy framework section be amended to include reference to additional works including recent acts of parliament, building regulations, British standards and codes of practice.
- A respondent referred to paragraph 3.10 and suggested that local planning controls need to be established and enhanced to ensure the quality, standard, suitability and right mix of developments including conversions to HMOs.
- A local group suggesting extending the SPD area and Orpington BID area to the A224 Cray Avenue / Court Road to include the entirety of Priory Gardens, High Street and Carlton Parade. As the gateway to Orpington Town Centre, the approach from the A224 should be given due consideration in planning guidance.
- A local group considers that the SPD should help to create a green network connecting green spaces around the edges of the town centre and place the town centre at the heart

- of a 20-Minute Neighbourhood with the aims and objectives of creating a healthier, active, prosperous community. The group cites a number of sources in support of the idea.
- A number of respondents, including 'Nuts to the Walnuts', considered that the responses to a planning application for a large mixed-use development proposal on the Walnuts site should be considered as part of the SPD responses.
 - 'Nuts to the Walnuts' considered that Councillors and Officers should distinguish between positive regeneration plans which would enhance Orpington, and massive overbearing developments, which would not. The SPD should help Councillors and developers to do this by clearly setting out what is acceptable and what is not.
 - 'Nuts to the Walnuts' requested that the SPD state that Council Officers and Ward Councillors have a duty to liaise formally and regularly with residents regarding medium and large developments in the local area.
 - Some respondents raised concerns about the SPD consultation, including the following:
 - Criticism that the document link did not work.
 - Criticism about the lack of public engagement sessions either as face-to-face presentations or online.
 - 'Nuts to the Walnuts' recommended a variety of additional consultation techniques for future consultations by the Council and developers, including documents being made available in a variety of different formats and languages; and having a telephone answering service.
 - Lack of awareness of the consultation process and the opportunity to comment via Commonplace appears limited in duration especially given the context of the pandemic guidelines. This may have limited the quality and quantity of the feedback.
 - Need for a proper resident consultation with planning officers regarding what they would like to improve Orpington and not what is being proposed.
 - One respondent considered that the draft SPD and supporting SEA screening statement were poorly prepared and written and that neither should have been released for consultation at this level of preparation. Neither have a clearly identifiable reference number, revision number, author or checker listed. Neither appear to have been written to 'Plain or Crystal Mark' standards, and the resident is reliably informed that they are also not available in any other form: eg Brail (sic), other languages etc. The respondent also states that a reasonable ability to use computers seems to be required to access these documents and respond and from their experience of Orpington these resources may not be available to everyone.
 - One respondent raised the potential for 'rights to light' issues as a result of the development of new tall buildings.
 - One respondent wanted to see common sense and decency, and buildings erected with style.
 - Several respondents suggested that Orpington should stay the same as it is today, and considered that there should be no more development at all in the area, in order to maintain a nice quiet high street.
 - One respondent noted the need for a feeling of welcome and safety.
 - One respondent considered that paragraph 4.21 (relating to the Healthy principle) should include reference to lessons learned from Grenfell and COVID pandemic.
 - With reference to guidance note 6, it was suggested that fully independent peer review of all HIA reports should be included by a company which has been given prior approval by LBB DCC committee.
 - 'Nuts to the Walnuts' considered that development proposals should ensure adequate disabled only parking bays, thoughtfully placed to maximise accessibility; and that the SPD should state that planning applications must provide fully accessible lifts which accommodate all types of wheelchair and mobility scooter.

- TfL Commercial Development suggested including the redevelopment of Orpington Bus Station as a potential development opportunity, subject to any TfL operational requirements including bus-rail interchange being accommodated as appropriate.
- TfL state that they would be supportive of the redevelopment of the station car park and the introduction of a CPZ in the town centre and surrounding the station.
- 'Nuts to the Walnuts' suggest that the SPD should fully explore the potential of smaller sites away from the town centre with a view to dispersing development across the borough to accommodate families.
- A number of other respondents consider that there should be full public and club consultation of the needs of leisure and swimming facilities for Orpington and surrounding area, ahead of any planning decision regarding the pool.
- 'Nuts to the Walnuts' and several other respondents raised concerns about the financial robustness of developers (including a comment about a non-local non-British developer) and highlighted the risk of approved development not being completed and a new leisure centre not being delivered. 'Nuts to the Walnuts' consider that the SPD should state that a comprehensive financial risk assessment will be carried out before planning permission is granted to any developer undertaking large scale redevelopment projects in Orpington. Another respondent suggested that any development is phased to ensure that the leisure centre is completed prior to other development.
- One respondent criticised the lack of explanation of the vision for the Bromley Borough from the Local Plan of 2019 or how this has been aligned with in the draft SPD.
- One respondent considered that the vision should include Beckenham and Penge
- A developer/landowner with a land interest within the town centre was supportive of the underlying principles that the SPD seeks to deliver for the town centre; but considered that there are a number of Guidance Notes within the document that are unduly restrictive in the absence of a full evidence base. Further comments were provided in relation to several guidance notes, which are detailed in the relevant topic areas above.
- There were several suggestions for lower business rates.
- One respondent suggested that the SPD should seek to retain Lynwood House which is adjacent to Site 12.
- Several respondents noted support for further development and changes to the town centre and further investment.
- Several respondents suggested that redevelopment in the area would devalue properties.
- A local group suggested an amendment to celebrate connections with Eltham, Orpington's nearest Major Town Centre, as Seely and Paget, the architects of the former Orpington Library (adjoining The Priory) had previously created the controversial Art Deco extension to Eltham Palace.
- A local group suggest an amendment to paragraph 3.1 as the Priory is somewhat older than stated. The group also suggest that a reference is added to note that the River Cray rises in Priory Gardens.
- A respondent felt that the redevelopment of / around Gravel Pit Way should be one of the highest priorities, as it is an unattractive and under-utilised part of the town centre, whilst another felt that Gravel Pit Way cannot support the proposed development.
- A respondent stated that gentrification risks freezing out local people.
- A respondent felt infill developments should be avoided and others queried references to "Historic gaps" (in the SPD Vision), 'so-called' undeveloped or underdeveloped areas.
- Some respondents noted that the SPD has split Orpington into zones, but felt that consideration should be given to the impact of its decisions in one zone, on other zones, and the character areas should be treated as a coherent whole not developed in isolation from each other.
- One respondent queried why Carlton Parade is not considered part of the town, not least as it provides a focal point beyond the village.

Comments relating to Strategic Environmental Assessment (SEA)

- 6.230 The response from Historic England raises concern about guidance proposed for the 'Market Square, Orpington College & the Walnuts Shopping and Leisure Centre' sub-area. Historic England consider that the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan, allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings. They consider that the effects on designated heritage assets in close proximity need to be understood before any decision on the suitability of such development is made. Historic England consider that this approach would represent a plan-led approach to tall buildings and sustainable development as required by the NPPF (para 15) and London Plan policy D9, which would proactively look to conserve and enhance the historic environment.
- 6.231 Given these issues, Historic England consider that the draft SPD should be subject to a Strategic Environmental Assessment (SEA), which would enable proper understanding of the effects on heritage significance and the wider historic character, and help inform the design parameters in such a way as to avoid and/or mitigate them. It will also allow for better understanding of how such proposals relate to relevant planning policy in national, London-wide and local terms.
- 6.232 The Council has prepared a revised SEA Screening Statement to accompany the final SPD. This sets out our response to Historic England's comments about the requirement for an SEA. The Council is the responsible authority for determining whether an SEA is required for the SPD. To assist with this determination, the Council is required to consult specific bodies (including Historic England) identified in legislation, to gauge their views on whether an SEA is necessary; these views are not binding on the Council's decision.
- 6.233 Officers fundamentally disagree with Historic England about the need for an SEA. The comments are based on a misunderstanding of the role of the document. The guidance provided in the document relating to 'Development Opportunities' is not a site allocation – it is broad guidance which notes potentially suitable development height (based on officer judgement), and it defers to the need for detailed justification to address relevant policy requirements. This would include London Plan policy D9 which has specific consideration of heritage impacts. For the avoidance of doubt, the SPD has been amended to provide further clarity about the 'Development Opportunities'.
- 6.234 Regarding Historic England's view that the SPD is in effect creating new policy beyond that set out in the adopted Local Plan, it is noted that Policy 1 of the Local Plan identifies Orpington Town Centre as a broad location where additional large housing sites may come forward. The housing trajectory at Appendix 10.1 of the Local Plan attributes 125 units from this source of supply, although this quantum is not the result of detailed modelling and is not a cap, hence it does not preclude delivery of a greater quantum of housing. Other sources of supply from 'Broad Locations' set out in the Local Plan housing trajectory – changing retail patterns and Public Land Reorganisation – envisage delivery of almost 600 units and could in principle relate to Orpington Town Centre.
- 6.235 Another respondent raised issues with the SEA screening statement, disagreeing with the Council's assessment of seven points in Tables 1 and 2 of the SEA screening statement. The Council consider that these points are not relevant, and do not change the initial conclusion of the SEA screening statement, that an SEA is not required. A detailed response to each of the seven points raised is provided in the updated SEA screening statement.

7 How have the issues raised in the draft SPD consultation been addressed in the final SPD?

7.1 The Council thanks all respondents for taking the time to respond to the draft SPD. The issues raised during the draft SPD consultation have been considered in detail when preparing the final SPD. This section sets out how these responses (as set out in section 6) have been addressed in the final SPD. The comments received have informed a number of amendments, which have helped to clarify and improve the SPD guidance.

'Nuts to the Walnuts' campaign group responses

7.2 As noted above, a number of 'Nuts to the Walnuts' template responses were received, which indicated support (or not) for eight specific issues. The response to these issues is set out in the section below, as part of Council's response to a range of issues raised by other consultation responses (as the same issues were raised by a number of respondents).

Issues raised by consultation responses

7.3 Tables 4 to 13 below set out how the Council have addressed the consultation comments raised in section 6 (paragraphs 6.8 to 6.235) when preparing the final SPD.

7.4 There were a number of comments that concerned broad issues with the SPD format/structure, including a significant number of comments which suggested repeating various policies from the Local Plan or London Plan. Many of the policies suggested would be relevant to development in Orpington, but as a general rule, such policies do not need to be repeated in the SPD. The role of the SPD is to provide guidance to support the implementation of the policies in the Development Plan; the SPD needs to be read alongside the Development Plan (Bromley Local Plan and the London Plan). There are some circumstances where a reference to relevant policies may be suitable, but this does not require policies to be copied verbatim. Where appropriate, such references have been added in response to suggestions made, including additional references to relevant policy and guidance in the SPD guidance notes.

7.5 A number of respondents suggested some useful amendments to text throughout the document, to clarify or expand points. A lot of these suggestions were already covered in the SPD, or, in some cases, they were not considered appropriate; however, a number of minor amendments have been made where they were considered appropriate.

7.6 A significant number of responses proposed the creation of new policy. While a number of these responses raised relevant issues, unfortunately an SPD can only provide guidance to help implement existing policy, and it cannot introduce new policy. Therefore, no amendments were made in relation to these comments. The Council is currently reviewing the Bromley

Local Plan, and people are encouraged to respond to consultations on the emerging plan⁸ to shape the development of new policy.

- 7.7 There were also a lot of comments that referred to non-planning matters. While many of these comments raised legitimate points, they are outside the remit of the SPD and therefore no amendments were made in relation to these comments. However, where comments related to specific suggestions which could be relevant for other Council departments (e.g. transport), these suggestions have been forwarded to the relevant departments for information. While this does not provide any guarantee that these suggestions will be actioned, the relevant departments will now be aware of the comments and can consider them as part of their ongoing work (where appropriate).
- 7.8 A number of responses suggested minor changes to correct grammatical errors and typos (both actual and perceived). These have been amended where necessary.
- 7.9 There were some responses advocating the use of Plain English and a request to include a glossary. The SPD is a planning document, and while we have tried to make it as accessible as possible with regard to the terminology used, there will inevitably be significant use of technical terms and wording. A glossary is considered unnecessary as we consider that the meaning of the terms used is clear in the context of the document and will be understood by the expected users of the document (e.g. applicants, planning officers).

Table 4: Tall buildings, character

Response	How has response been addressed?
<p>Need to protect local character; new high density development will cause adverse impacts on character. Need to consider adjacent conservation area, local views of importance (including views not designated in the Local Plan) and potential for impacts on the Green Belt and nearby AONB.</p> <p>New buildings should respond to the height, scale, bulk and mass of existing buildings, was some support for sensible, proportionate development. Orpington should not become like other areas which have been ruined by the recent development of taller buildings.</p> <p>Conversely, one respondent considered the height of development in the town centre should not be unnecessarily restricted – particularly if it facilitates broader benefits; but providing that the architecture, design, and delivery are of the highest quality.</p> <p>A developer/landowner welcomed the guidance on the Walnuts and Market Square in the draft SPD, but noted concerns about some of the key parameters for development proposals in this area, namely that the SPD does not set out</p>	<p>Change – the Council agrees with the respondents regarding the importance of protecting local character and heritage assets. The SPD already reflects these important points, but further policy references have been added to emphasise this further.</p> <p>As set out in GN11, any tall building must address relevant policy requirements, which will include consideration of many of the issues raised by respondents.</p> <p>Where the SPD identifies building height, this has been informed by officer judgement taking into account the context (both in terms of the site and wider area) and consideration of relevant reference points and where taller elements can be suitably located. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p> <p>The indicative heights are considered reasonable and appropriately justified. It is</p>

⁸ The latest information on the Local Plan review process is available on the Council's website - <https://www.bromley.gov.uk/planning-policy/review-bromley-local-plan>

Response	How has response been addressed?
<p>how the suggested height ranges and massing were established. Respondent considers that this lack of justification means the draft SPD is not 'sound'. In the absence of a proportionate evidence base, Guidance Note 11 should be revised to simply acknowledge the site is appropriate for tall buildings and that actual heights fall to be determined at planning application stage following completion of a full assessment considering all relevant criteria set out in London Plan Policy D9.</p> <p>The developer/landowner also commented on guidance provided for the Orpington West area, noting that whilst the high street is predominately characterised by 2-3 storeys this should not be a blanket approach when considering appropriate heights for this location.</p>	<p>noted that soundness tests do not apply to SPDs, as per paragraph 35 of the NPPF.</p>
<p>Tall buildings will not preserve or enhance the existing qualities of Orpington's town centre. They will block out light, change the skyline and are incompatible within such close proximity to the town's Conservations Areas. Building heights should therefore be capped, various suggestions for caps ranging from 1 to 9 storeys.</p>	<p>Change – we recognise that tall buildings may be more likely to cause adverse impacts (including those impacts raised by respondents). This makes the need for robust assessment of any tall building application extremely important. Further policy references have been added to the SPD to emphasise the need for detailed assessment of potential impacts.</p> <p>In response to the requests to cap building heights, we recognise the concerns that have informed these suggestions. There was a general consensus that buildings up to 9 storeys (the height of Brunswick House) would be suitable on the Walnuts site; this is consistent with the Council's view set out in the SPD that development of predominantly 3-9 storeys would be appropriate across the Walnuts site.</p> <p>The introduction of explicit caps on height would constitute new policy, and this is something that cannot be introduced in an SPD.</p> <p>The Local Plan has no restrictions on height anywhere in the borough; policy 47 is a criteria based policy, which means that applications are assessed against specific requirements on a case by case basis.</p>

Response	How has response been addressed?
<p>Additional wayfinding building not necessary as the Orpington College building already acts as a wayfinding building.</p>	<p>No change – the responses raise some relevant points regarding wayfinding, but we consider that the reference is appropriate and reflects adopted planning policy. Development at the Walnuts site is an opportunity to create a new focal point to improve legibility, although it is important to note that this alone would not justify a tall building – a range of other policy requirements would need to be addressed to justify a tall building.</p>
<p>Why do the Council consider that a 12-15 storey building is suitable on the Walnuts site, wouldn't this be contrary to the advice in national planning policy, GLA officers (as expressed in the GLA Stage 1 response to the planning application for the Walnuts site) and elsewhere in the SPD (paragraph 5.15, p26)?</p>	<p>Change –policy and guidance relating to the suitability of tall buildings is complex and the SPD seeks to clarify how these interact. It includes a number of references to relevant policy and guidance, and further references have now been introduced, including reference to national policy in the NPPF relating to the historic environment.</p> <p>A building up to 15 storeys in height would not, in principle, be contrary to national planning policy, GLA advice or paragraph 5.15 of the SPD. Suitability will ultimately come down to case by case assessment against relevant planning policy and guidance.</p> <p>National planning policy does not restrict tall buildings in principle. There are a number of national policy considerations that would apply to the determination of tall building application, but these mirror the policy requirements which are set out in the SPD.</p> <p>The GLA stage 1 report for the withdrawn application at the Walnuts site was commenting on a specific proposal for a range of tall buildings up to 19 storeys, hence it is not relevant to the SPD (which does not suggest a building of this height would potentially be suitable). Notwithstanding this, the report does not object to tall buildings in principle – the report summary notes: <i>Tall buildings on the site are considered acceptable in strategic terms, however their visual, environmental and cumulative impacts need further assessment.</i></p> <p>Paragraph 5.15 states that proposals will need to respond appropriately to the prevailing heights in the area. This does not mean that heights should be capped at the prevailing height level.</p>

Response	How has response been addressed?
<p>It is ambiguous whether the guidance for the Walnuts and the College site allows buildings of more than 15 storeys.</p>	<p>Change – a change has been made to provide further clarity in relation to this point.</p> <p>For clarity, the guidance considers that development of up to-15 storeys is appropriate but cannot rule out buildings of any height as there is no policy to prevent this.</p>
<p>A tall building at the Walnuts site will be a precedent used to justify tall buildings elsewhere in the town centre and elsewhere e.g. Derry Downs.</p>	<p>No change – we understand why this issue may cause concern, but we can confirm that all tall buildings will require site-specific justification, assessed against relevant policy and guidance. In the event a tall building is permitted at the Walnuts site, this would not automatically be relevant justification to justify further tall buildings.</p>
<p>Respondents raised concerns about various potential impacts that might result from new tall buildings, including microclimate, overshadowing and overlooking impacts, mental health impacts, accessibility and crime and ASB increases. Suggestion that then higher elements should be for commercial purposes as this is less intrusive in terms of overlooking. Several respondents suggested that tall buildings are not suitable for children. The expense of maintenance of tall buildings was highlighted. 'Nuts to the Walnuts' suggested requiring tall building applications to provide computer modelling to show the extent of certain impacts.</p> <p>Several respondents cited the London Assembly Planning & Regeneration Committee investigation on living in high rise buildings, to support comments on the adverse impacts of tall buildings.</p>	<p>Change – we agree that many of the potential impacts raised by respondents are important considerations that would need to be addressed as part of the assessment of any tall building application. The SPD already references relevant policy and guidance which would ensure that these issues are fully assessed where an application comes forward, but further policy references have been added to highlight additional policy and guidance relevant to the comments made by respondents.</p> <p>Issues such as health impacts and ASB/crime impacts may be relevant where there is evidence that impacts are likely to materialise, but there is no evidence to suggest that such impacts are an inevitable consequence of tall building applications.</p> <p>There is no in principle issue with families with children occupying tall buildings.</p> <p>Maintenance of tall buildings is a key consideration of London Plan policy D9.</p> <p>The cited London Assembly report is not policy and would not be material to a planning application or the preparation of the SPD.</p>
<p>A number of respondents raised issues relating to fire safety. Nuts to the Walnuts' consider that the SPD should state that all developers building high-rise homes will be contractually obliged to fund and carry out Personal Emergency Evacuation Plans (PEEPs) once</p>	<p>Change – fire safety is an important issue, and the Council agrees that it is important for tall building applications to fully address this issue.</p> <p>Some of the issues raised by respondents are covered by other regimes, particularly Building</p>

Response	How has response been addressed?
<p>residents have moved in. Other respondents noted concern about the lack of fire appliances to tackle fires in high-rise buildings, and the need to consult the London Fire Brigade on tall building applications. ‘Nuts to the Walnuts’ also consider that the SPD should state that developers must fully uphold several legal obligations, including the Fire Safety Order 2005, the Equality Act 2010, and the Human Rights Act 1998, as a condition of planning permission being granted.</p>	<p>Regulations. These regimes operate independently of planning, so it is not necessary to repeat their requirements in the SPD.</p> <p>The London Plan has a policy relating to fire safety, and the Mayor has recently consulted on a Fire Safety LPG. The Mayor’s policy and guidance includes requirements relating to evacuation strategies. Reference to the policy and draft LPG has been added to the SPD.</p>
<p>A developer/landowner objects to the reference to the use of red and buff brick on the High Street to inform new development in the area.</p>	<p>No change - the reference is considered appropriate, as it is a commonly used material, and its use could help to maintain local character.</p>
<p>A local group expressed concern about guidance note 9, considering that it does not appear to defend heritage assets in line with the Historic Environment Objectives set out in the Bromley Local Plan. The group also consider that guidance note 9 should further state that Visual Impact Assessments should be made from positions where the view is clear, and not obscured.</p> <p>The group reference London Plan policy GG2 (E), noting this is reflected in para 5.9 of the draft SPD, but does not appear to be reflected in Guidance Note 9. The group also suggest that the SPD should include stronger encouragement of a heritage centre / space / offering, which would be in keeping with London Plan policy GG1 (C). Since the museum was closed, and the Priory building closed to the public there has been no cultural offering in the town for low-income families, and this should be promoted in the SPD, consistent with Bromley Local Plan’s Historic Environment Objectives.</p> <p>Suggested wording was put forward related to these suggestions.</p>	<p>Change – the Council recognises the concerns relating to the historic environment. The SPD includes a number of references to relevant policy and guidance, and further references have now been introduced, including an amendment to GN11 to include reference to national policy in the NPPF relating to the historic environment.</p> <p>Guidance note 9 is considered appropriate and is aligned with the policy and objectives of the Local Plan.</p> <p>The Council’s validation requirements are already referenced in GN9; the validation requirements set out circumstances where a TVIA will be required, which includes developments that affect heritage assets. Technical requirements for TVIAs are also set out.</p>
<p>One respondent suggested GN7 require tall buildings to provide publicly accessible viewing terraces, and rooftop gardens, whilst another highlighted that green spaces on top of buildings are rarely accessible to the general public.</p>	<p>No change – the respondent raises a valid point regarding public accessibility. GN7 already references the potential for rooftop gardens. GN7 also refers to London Plan policy D9 which states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate.</p>

Table 5: Social infrastructure

Response	How has response been addressed?
<p>A number of respondents raised the issue of existing pressure on infrastructure, which could worsen as a result of new development. Responses noted that new development should ensure that impacts of various types of infrastructure will be mitigated, including through provision of new services. Suggestions for various different types of infrastructure were put forward.</p> <p>'Nuts to the Walnuts' and other respondents recommended that the SPD include facts about the capacity of the town's existing infrastructure and require developers to provide sum of money (additional to CIL) to pay for extra infrastructure.</p>	<p>Change – a number of valid concerns have been raised in terms of infrastructure provision and the need for new development to ensure that the capacity of local infrastructure is sufficient to support existing communities and new development.</p> <p>Bromley CIL has been adopted which is intended to cover general infrastructure requirements, securing contributions from individual schemes which can be used to fund new/improved infrastructure (as determined by the Council). If a proposal will cause site-specific impacts/pressures on infrastructure, there is potential to secure specific infrastructure or contributions toward new infrastructure.</p> <p>The updated Planning Obligations SPD sets out a range of requirements relating to infrastructure; reference to the updated Planning Obligations SPD has been added to the Orpington TC SPD.</p> <p>It is not necessary to set out information on infrastructure capacity in the SPD. Impacts on infrastructure are assessed case-by-case as provision may change over time and different applications will have different impacts.</p>
<p>A number of respondents stated the importance of retaining the Saxon day centre. Some comments suggested retaining the existing centre as is, while others were more open to replacement facilities in the area but were clear that any replacement facility must be operational prior to the existing centre closing.</p> <p>A local group suggested re-siting the Saxon Centre to Priory Gardens depot, with potential to expand health and wellbeing activities, create community garden, and benefit from access to formal gardens and green space.</p>	<p>Change – the Council agrees with the points raised by the respondents, and acknowledges that this was a gap in the draft SPD guidance. Further guidance has been provided in the SPD.</p>
<p>The NHS Healthy Urban Development Unit noted support for guidance notes 16 and 17 but suggested minor changes to guidance note 6 to impose a stronger requirement for Health</p>	<p>No change – the Council recognises that HIAs can be beneficial in terms of identifying and addressing health impacts of development. However, there is no Local Plan policy for HIAs, only the reference in Objective GG3 of the</p>

Response	How has response been addressed?
Impact Assessments to be submitted as part of planning applications.	London Plan. Therefore, it is not possible to introduce a stronger requirement as this would be creating new policy.
'Nuts to the Walnuts' consider that the SPD should clearly state the density of new housing which the existing infrastructure can realistically support. Developers should have clear and deliverable plans on how to expand the infrastructure if larger numbers of homes are proposed. Developers should also bear most of the cost of any expansion.	<p>Change – the respondent raises a valid issue in terms of the potential for increased pressure on infrastructure as a result of higher density development.</p> <p>With regard to the suggestion to clearly state density levels that can be supported, it would not be possible to quantify density in this way, and even if it was, the figures would fluctuate regularly and would likely be out of date very quickly. This could cause confusion.</p> <p>The Planning Obligations SPD sets out various infrastructure requirements for different types of development. Applicants are expected to provide justification to support development proposals, including information on how infrastructure requirements are addressed. Reference to the updated Planning Obligations SPD has been added to the Orpington TC SPD.</p>
'Nuts to the Walnuts' recommend that the Council consult the Metropolitan Police in relation to police provision.	<p>Change – the Council agrees that the Metropolitan Police Service are important consultees in relation to police provision and potential impacts on crime and ASB. We can confirm that the MPS were consulted on the SPD and are consulted on planning applications where necessary.</p> <p>Reference to the Urban Design Guide SPD has been added to the Orpington Town Centre SPD. The Urban Design Guide sets out guidance on designing out crime.</p>
Nuts to the Walnuts' and other respondents state that the SPD should make it clear that the College should remain an educational establishment and not be used for residential or any other purposes. One respondent suggested that any redevelopment of the college building should prioritise retrofit rather than demolition and rebuild.	<p>Change – the Council agrees that the college site should be retained in educational use, as this adds to the diversity of uses in the town centre, enhancing vitality and viability and providing important educational opportunities.</p> <p>The SPD cannot completely rule out change of use of the college site. The SPD notes the potential opportunity to enhance college provision; a further amendment is proposed to clarify that any loss of education provision would need to address both Local Plan policy</p>

Response	How has response been addressed?
	<p>20 and policy 27 which aims to limit loss of social infrastructure.</p> <p>The guidance for the college site does prioritise a retrofit first approach, although this cannot be mandated.</p>

Table 6: Heritage and design

Response	How has response been addressed?
<p>Historic England note concern about the development opportunities outlined in section 6 (Orpington East sub-area); they considered that these are not based on an appropriate evidence base and that potential effects on the historic environment have not been properly assessed, understood or avoided. In particular, they consider the identification of the Walnuts shopping centre as a suitable site for what would be in local terms a very tall building to be premature at this stage, and that the draft SPD is in effect allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings.</p> <p>This point is echoed by other respondents, as can be seen in the 'tall building' responses noted above.</p> <p>Historic England further note the indication at paragraph 1.3 that the preparation of the draft SPD for the town centre will inform the local plan review process. Should the allocation of the Walnuts shopping centre site and the design parameters at paragraph 6.4 be confirmed in the SPD and carried forward to the emerging local plan, they consider that it would not be possible for the Plan to be in conformity with national and regional planning policy as it relates to the historic environment.</p> <p>Historic England conclude that, in relation to the Walnuts site, the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan; and that, while this is potentially problematic in itself, the absence of evidence and assessment of potential effects also fails to</p>	<p>Change - Paragraphs 6.230-6.235 set out the Council's response to the comments regarding SEA. The revised SEA screening statement also sets out details on how the responses raised have been addressed.</p> <p>The SPD has been amended to clarify the role of the development opportunities identified in the SPD.</p>

Response	How has response been addressed?
<p>reflect the requirements of NPPF paras 31 and 190.</p> <p>Due to these concerns, Historic England consider that the SPD should be subject to an SEA to ensure that the development process would proactively look to conserve and enhance the historic environment.</p>	
<p>Historic England suggest that there is potential for a separate Archaeology SPD for the Town Centre, referring to an example in Sutton. They consider that this would mean that potential developers could determine with confidence the archaeological context of their site and whether it would require early consideration in the planning process.</p>	<p>Change – the Council agrees with Historic England regarding the importance of archaeology. We consider that an additional SPD for archaeology is not considered necessary, but a reference to the Urban Design Guide SPD has been added which reinforces the importance of archaeology in Bromley.</p>
<p>‘Nuts to the Walnuts’ request that the SPD states that the external appearance of developments are important and that quality materials should be used which not only comply with safety standards, but are also pleasing to the eye and are in keeping with the surrounding area. Other respondents suggested that design should conform to the architectural and cultural heritage to maintain Orpington’s traditional and historical setting. Some respondents referenced the need for beautiful development, citing the changes to the NPPF relating to beauty.</p>	<p>Change – the Council agrees with the respondent about the importance of external appearance and materials. This is covered by policies in the Local Plan and SPD guidance note 3.</p> <p>Reference to the Urban Design Guide SPD has been added to the SPD to provide a clearer link to the Council’s design expectations.</p>
<p>Contradiction between paragraph 5.12, p25; and paragraph 6.3, p35, relating to promotion of quantum over quality. The SPD should be clear that the focus is on quality of place, not the quantity of new development.</p>	<p>Change – the Council notes the comments and reasons for confusion, however, the statements are not considered to be contradictory, as it is possible to develop a significant quantum of new housing and commercial development through a design-led approach which optimises the site. The statement at paragraph 6.3 does not promote quantum over quality, it promotes quantum in line with the design-led approach set out in paragraph 5.12.</p> <p>To make the link with the design-led approach clearer, paragraph 6.3 has been amended.</p>
<p>Suggestion to extend the Priory conservation area</p>	<p>No change – the Council acknowledges the importance of the existing Priory Conservation Area as an important heritage asset, and this is reflected in the SPD. However, the SPD cannot extend the conservation area.</p>
<p>One respondent questioned a change in policy from Areas of Archaeological Significance to</p>	<p>Change – the Council acknowledges the potential for confusion between the different</p>

Response	How has response been addressed?
<p>Archaeological Priority Areas and felt that the SPD should be amended to refer to the draft Archaeological Priority Areas.</p>	<p>designations. Paragraph 3.25 has been amended to provide clarity on this issue.</p>
<p>A local group suggested that the disposal of and subsequent limited public access to the Priory despite its historic and cultural value to the town, and the moving of the museum to Central Library despite many of the artefacts originating from and relating to Orpington and its environs, has had a detrimental impact on the Town Centre's cultural offer. The group suggest that the SPD acknowledge the impact that the disposal has had on the town centre and local community. Another respondent suggested that the Priory should be preserved.</p> <p>Several respondents felt the opportunity should be taken to highlight various aspects of the history of the area.</p>	<p>No change – the Council acknowledges the importance of the area's history in assessing character. Section 3 refers to the area's history in broad terms, as part of establishing character. The role of the SPD is to set out planning guidance, so further references are considered unnecessary.</p>
<p>A respondent was concerned that the Crofton Villa area should be protected and not be over developed; another suggested no development 'by the Roman Villa'.</p>	<p>No change – the Council agrees that this area is an important heritage asset that should be protected. Section 8 of the SPD provides guidance which emphasises the importance of the Croton Roman Villa.</p>
<p>A developer/landowner considered that the requirement to ensure schemes are reviewed by an independent Design Review Panel will assist in ensuring that high quality development is brought forward in the town centre and as such, the requirement was supported.</p> <p>Other respondents made the following comments in respect of an independent Design Review Panel referred to in GN3:</p> <ul style="list-style-type: none"> • conclusions should be advisory only, and should not be given priority over local residents' views. • the panel should include a proportion of local residents. 	<p>No change – the Council agrees that the Design Review process can add significant value by improving the design quality of development proposals.</p> <p>Design Review Panel comments are always advisory – they provide non-binding, expert advice to officers and members. The Council makes planning decisions taking into account a range of views. There is no automatic priority of such views, the relevance and weight given depends on the quality of the response and whether it raises valid planning issues.</p> <p>DRPs are run as an independent, expert function, in order to give appropriate design advice to inform the development of planning applications and achieve high quality design. It would not be appropriate for local residents to sit on the DRP as it would undermine the independent nature of the advice.</p>
<p>A respondent raised concern about the lack of reference to Secured by Design (SBD), noting that safety and security measures can be included in the design and layout of buildings</p>	<p>Change – the Council agrees that the design of development proposals should consider issues of safety and security from the outset.</p>

Response	How has response been addressed?
and public areas, keeping residents, workers and visitors safe.	Reference to the Urban Design Guide SPD has been added. This document sets out detailed guidance on designing out crime which addresses the issues raised.

Table 7: Transport

Response	How has response been addressed?
<p>There was support and objections to the principle of car-free development. A number of respondents noted the need to protect existing parking provision and the need for more parking, including better disabled parking.</p> <p>A number of respondents suggested that the PTAL rating of 4 (moderate) in the area of the Walnuts should be stated in the SPD. One suggests that the PTAL for each character area is highlighted, and that the Council ensure the correct parking allocation in applications.</p> <p>Some respondents sought a commitment to increase electric vehicle charging points.</p>	<p>No change – the Council notes the range of comments received regarding parking provision.</p> <p>The SPD reflects parking policy set out in the London Plan, including policy relating to EV charging points; it cannot introduce new policy.</p> <p>The London Plan parking standard for Major Town Centres would be the relevant parking standard for Orpington; this sets out a requirement for car-free development.</p> <p>PTAL ratings can vary across character areas and individual sites. It would not be appropriate or necessary to state PTAL ratings in the SPD. Where necessary, PTAL ratings can be checked using the TfL WebCAT tool - https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</p>
<p>There were a number of comments relating to sustainable transport. Some comments suggested that the SPD should be more ambitious in promoting walking, cycling and public transport including supporting better walking, cycling, bus and rail infrastructure. There were various suggestions for new sustainable transport infrastructure. Potential improvement of specific routes within and at the edge of the town centre was mentioned by a number of respondents.</p> <p>Several respondents suggested that proposed new cycle lanes must be subject to consultation. There were several negative comments regarding the new cycle lane to Orpington Station. One respondent noted that buses to Orpington Station can sometimes take</p>	<p>Change – the Council notes the suggestions put forward for new routes and infrastructure. These suggestions have been passed to the relevant Council department for information.</p> <p>The SPD does highlight the importance of walking, cycling and public transport, and supports further opportunities for active travel as part of the ‘connected’ design principle. The SPD vision has been amended to reflect comments from TfL (using the term minimised not mitigated).</p> <p>The SPD references the updated Planning Obligations SPD which sets out requirements for obligations to secure transport network improvements and improved sustainable transport measures. Specific reference to transport planning obligations has been added</p>

Response	How has response been addressed?
<p>20 minutes due to the impact of new cycle lanes.</p> <p>TfL suggested an amendment to the vision which adds that walking and cycling will be prioritised and traffic impacts on public spaces will be minimised.</p> <p>A local group considered that the main approaches to the High Street create severance and are often barriers to active travel, e.g. A223 Sevenoaks Road, A232 Station Road / Spur Road, A224 Cray Avenue / Court Road, due to volume and speed of vehicles. The group suggested that a 20 mph speed limit should be extended from High Street to cover surrounding areas where residents live unless there are segregated/protected footways and cycleways.</p>	<p>to paragraph 2.19 to highlight the importance of these measures.</p>
<p>Orpington 1st noted that the transport links to London are a major attraction for businesses and residents locating or relocating to the town centre; they fully support a vision to continue to improve the station as a transport hub with associated infrastructure, so it is a vibrant and welcome access point that can integrate more effectively with the surrounding area and town centre. There should be opportunities to expand and modernise the site with additional associated businesses, and services that complement the transport hub.</p>	<p>No change – the Council agrees with the respondent about the importance of strong transport links. The SPD sets out support for such opportunities in paragraph 8.17.</p>
<p>Several respondents suggested that the High Street should be fully or partially pedestrianised, some recognising that it would need careful consultation with the residents who would be affected, while a number of others objected to the idea of pedestrianisation entirely.</p>	<p>No change – the Council notes the comments relating to pedestrianisation, and that there is no consensus for or against such schemes. The SPD supports improvements to sustainable transport but cannot mandate pedestrianisation even if this was considered appropriate. The suggestions have been passed to the relevant Council department for information.</p>

Table 8: Leisure centre

Response	How has response been addressed?
<p>A significant number of respondents commented on the leisure centre, with many noting its importance as a community asset which provides important services to a diverse range of residents. A lot of respondents noted that the SPD has limited reference to the leisure centre and suggested additional guidance should be provided to help protect the leisure centre.</p> <p>A lot of suggestions were put forward covering things respondents would like to see retained, suggestions for new and improved provision and general comments noting other concerns.</p> <p>'Nuts to the Walnuts' state that the SPD should insist that developers give full details at the outset about how they will ensure that the town's leisure facilities will not be interrupted during construction.</p>	<p>Change – the Council agrees with the points raised by the respondents, and acknowledges that this was a gap in the draft SPD guidance.</p> <p>The SPD has been amended to include detailed guidance on the leisure centre, in line with policy 20 of the Local Plan.</p> <p>The Council thanks respondents for the suggestions for new and improved leisure centre facilities. The suggestions have been passed to the relevant Council department for information.</p>
<p>'Nut to the Walnuts' and other respondents consider that the SPD should insist that any development which would impact on the leisure centre (and the Saxon Centre) be subject to a Council led independent public consultation taking place; and that the consultation should take place before any land deal is formally agreed with a developer, otherwise the consultation will be seriously compromised. This consultation should liaise closely with relevant user groups and follow Government principles for carrying out consultations.</p> <p>'Nuts to the Walnuts' consider that the SPD should state that consultations should include the following options:</p> <ul style="list-style-type: none"> • the refurbishment of the existing leisure centre over time • the building of a new leisure centre, next to the old one, before demolition • the building of a new leisure centre, near the town centre, before demolition. 	<p>Change – the Council recognises the importance of community engagement on redevelopment proposals. The SPD cannot set out a general requirement for such consultation, but the Council note that an extensive consultation exercise has recently been undertaken to shape proposals for the Walnuts leisure centre – https://www.bromley.gov.uk/news/article/461/views-are-being-sought-about-improving-the-walnuts-and-west-wickham-leisure-centres</p> <p>Relevant planning consultation procedures would apply to any planning application involving redevelopment of the leisure centre.</p> <p>The SPD has been amended to include further guidance on the leisure centre, which states that retention of the leisure centre in the town centre would be the preferred option given the importance of the leisure centre to the town centre offer.</p> <p>With regard to the Saxon day centre, further guidance has been provided in the SPD, as noted in table 5 above.</p>
<p>'Nuts to the Walnuts' also consider that the SPD should insist that the Council follows the guidance set out in GN8 and insist on a</p>	<p>Change – the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p>

Response	How has response been addressed?
retrofit approach in respect of the redevelopment of the leisure centre.	Detailed guidance has been provided for the leisure centre, and GN8 would also apply to redevelopment of the leisure centre.
Orpington 1 st would like to see a stronger message about retention of services within the town centre as the BID is strongly against any move to relocate the main leisure centre away from the town.	Change – the Council acknowledge the importance of the leisure centre to the town centre. The SPD has been amended to include reference to benefits of retaining the leisure centre within the town centre.

Table 9: Housing inc. Affordable Housing

Response	How has response been addressed?
<p>Nuts to the Walnuts' commented on the number of flats that they considered suitable in the area, based on a Facebook survey. The group (and other respondents) considered that no more than 250 accommodations should be built in the centre of Orpington, with all quotas for social, accessible and affordable housing met by developers.</p> <p>Some respondents accept that there is space for some housing in the town centre, but others questioned why any housing was needed in the town centre at all.</p> <p>A number of other respondents commented generally that too many homes are being proposed for the area, and this will result in overcrowding.</p> <p>One respondent suggests looking for alternative sites for housing in the Green Belt. Another respondent stated that there are other areas away from Bromley where housing could be achieved. Releasing brownfield sites to allow people to live in houses with gardens was suggested.</p> <p>One respondent states that Orpington has met its housing target. Another respondent states that Orpington should not be responsible for meeting most of Bromley's housing quota. A few respondents make reference to the already permitted residential units / units under construction within the town centre which</p>	<p>No change – the Council recognises the issues raised with regard to housing in town centres, and understands the concerns raised about the scale of housing development and the potential impacts this may have; with regard to additional infrastructure pressures, the responses in table 5 set out what the SPD and other documents can do to ensure sufficient infrastructure is in place.</p> <p>The borough housing targets are not disaggregated to specific areas, and there is no cap on housing in any areas. In town centres, housing is suitable in principle.</p> <p>Policy relating to affordable housing and accessible housing applies to all relevant developments, as set out in Local Plan and London Plan. There is no need to repeat this in the SPD.</p> <p>The London Plan identifies Orpington town centre as having 'medium' residential growth potential. This is adopted Development Plan policy prepared by the Mayor of London and the SPD cannot change this. It is noted that the Bromley Local Plan also supports residential development in town centres.</p>

Response	How has response been addressed?
<p>gives credence to reducing the proposed number of units.</p> <p>One respondent disagrees that Orpington should have “medium” levels of residential growth on the basis of the London Plan – such matters should be local matters and not matters for the Mayor of London.</p> <p>Orpington 1st stated that businesses welcome an increase in the resident population and are appreciative of the economic and social benefit created by people living in the town centre.</p>	
<p>One respondent suggested there was potential for flats above shops on the High Street up to Priory Gardens, while another noted potential for further housing off the High Street.</p> <p>Another respondent suggested limited housing development at northern end of the High Street in one way system might be suitable.</p> <p>One respondent stated that the high street should focus on providing retail and leisure facilities with limited housing above shops. One respondent suggested that the empty shops could be redeveloped for housing or flats.</p>	<p>No change – the suggested locations for housing all have merit and would be supported by the SPD. In particular, the SPD guidance for the Orpington North and Orpington West character areas states that residential uses on upper floors may be appropriate.</p>
<p>A number of respondents stated that there should be a mix of unit sizes, with gardens and parking. However, there are differing views on what the mix should be. For example, many note that 1 and 2 bed units do not meet need. One respondent stated that there are too many expensive retirement flats being built and we need affordable flats for the young of Orpington. One respondent stated that Orpington needs more houses, not flats and another stated they would like to see a mixture of maisonettes, low rise flats, small terraced houses and some bigger homes for families.</p> <p>Some respondents noted the need for new homes, including affordable housing, small/medium sized family homes and keyworker housing.</p>	<p>No change – the Council strongly agrees that provision of affordable housing is important where new housing is developed in the town centre. The size and type of units is also important to ensure that a range of housing need is met.</p> <p>Policy relating to affordable housing, housing size mix and housing typologies are set out in the Local Plan and London Plan. There is no need to repeat this in the SPD.</p> <p>We note the desire to develop houses from some respondents. Houses are an acceptable type of housing development but equally, flats are also suitable in principle.</p>
<p>TfL state that given the high PTAL in the Orpington Station and York Rise area, TfL would support higher density development</p>	<p>No change – The Council notes that these locations could, in principle, be acceptable locations for new housing, but, in the absence of</p>

Response	How has response been addressed?
<p>commensurate with the excellent connectivity in this location.</p> <p>One respondent suggested that in Orpington West existing housing and public areas could be enhanced with newer built accommodation similar to Lewisham where the old housing was replaced with a very compact and useful regeneration sandwiched between the railway lines</p>	<p>any firm proposals, it is not considered necessary to add reference in the SPD. The Council is currently reviewing the Local Plan, which might be a more appropriate avenue to promote proposals.</p>
<p>A number of respondents state that housing density should be design led and focus on quality not quantity, Others suggested that housing should be low density.</p>	<p>Change – the Council agrees that new development should be design-led. Policy D3 of the London Plan sets out the design-led approach and seeks to optimise the capacity of sites. Optimise means promoting quality <u>and</u> quantum, ensuring that the form of development is the most appropriate for the site and land uses meet identified needs. An approach which promoted quantum over quality (i.e. maximising) would not be consistent with policy.</p> <p>The SPD sets out guidance in line with policy D3 and other relevant policy relating to design. A reference to the Urban Design Guide SPD has also been added.</p>
<p>'Nuts to the Walnuts' and other respondents suggested that the Council investigates bringing vacant dwellings in Bromley back into use, to provide much needed homes ahead of approving mass building in Orpington town centre. One respondent suggests that the SPD should address the under occupation of housing and the need to downsize.</p>	<p>No change – the Council agrees that bringing vacant dwellings back into use is important as it ensures best use of housing stock. Although this issue is not relevant for the SPD, the Council does have active workstreams to address empty properties – https://www.bromley.gov.uk/empty-properties/empty-properties-1</p>
<p>'Nuts to the Walnuts' suggested that the SPD include the number of homes, including new homes built in each area for every year during the target period to date, 2019/20 – 2028/29. In this way Council members can judge the degree to which some areas are being over developed.</p>	<p>No change – monitoring borough-wide housing completions is important as it is a key factor for determining whether the Council meets the annual housing delivery test. However, the borough housing targets are not disaggregated to specific areas, and there is no cap on housing in any areas; the comment infers that applications could be refused on the basis of over-development against targets, but this would not be the case.</p> <p>There would also be practical difficulties given that the SPD is not a live document and it would only be able to set out known completions at the date of adoption.</p>

Response	How has response been addressed?
	<p>Housing completion figures can be accessed through other sources. The GLA provide live tables on housing statistics including a heatmap which visualises the location of completed development - https://data.london.gov.uk/dataset/residential-completions-dashboard - and the Council publishes figures as part of the Authority Monitoring Report- https://www.bromley.gov.uk/planning-policy/authority-monitoring-reports-housing-trajectory.</p>
<p>A developer/landowner requests that LBB review guidance note 10 to include reference to ensuring within sustainable locations, such as Town Centres and Opportunity Areas, density should be optimised. The current wording fails to align with the requirements of the NPPF, specifically paragraph 16, which requires plans to be prepared with the objective of contributing to the achievement of sustainable development. It also advocates the refusal of planning application that do not achieve sustainable development.</p>	<p>Change - GN10 refers to London Plan policy D3, which seeks optimisation of sites. The respondent appears to confuse optimise with maximise, as they seem to suggest that it is development quantum that should take priority; such an approach is not supported by policy.</p> <p>To make the link with the design-led approach clearer, paragraph 6.3 has been amended to include an additional reference.</p>

Table 10: Environment and air quality

Response	How has response been addressed?
<p>A number of respondents commented that sustainability, a changing climate and environmental impact should be at the heart of any plans and developments and sought an assessment of how the plan is compatible with these issues. A number of sustainable features were suggested for inclusion in the SPD.</p>	<p>Change – the Council acknowledges the importance of ensuring that new development is designed to be sustainable. The SPD has a specific ‘sustainable’ design principle which reflects a number of issues raised by respondents. The principle also refers to relevant Development Plan policies which cover these issues.</p> <p>A reference to the Urban Design Guide SPD has also been added; this document includes further detailed guidance on sustainable design.</p>
<p>Orpington 1st consider that the retention of greenspace surrounding the town centre is a priority alongside the creation of additional spaces within the footprint of the town centre. They support the intensification of development with a town centre first policy to avoid the erosion of greenspace, and would like to see the Grade II listed Priory</p>	<p>Change - the Council notes the suggestions put forward for new green features. These suggestions have been passed to the relevant Council department for information.</p> <p>The Council agrees with the respondents on the importance of green and open space. The SPD sets out the importance of green infrastructure,</p>

Response	How has response been addressed?
<p>Gardens prioritised as an opportunity, to create a celebrated visitor attraction.</p> <p>A comment from 'Nuts to the Walnuts' suggests that the SPD requires proposed developments to provide additional outdoor space for the wider community as well as private outdoor space for new residents.</p> <p>A number of respondents raised the need for more open and green spaces, trees, planters, shrubs, flowers and planting in the town centre. Some respondents noted that additional development in the town centre will increase pressure for such space. One respondent felt that references to increasing green infrastructure could be more committal. Guidance note 7 for example "should explore opportunities" - this needs to be stronger, mandatory unless there's an impossible barrier to it.</p> <p>A local group suggested more greening on Station Road to help mitigate vehicle emissions. Other suggestions for new greening were put forward, including suggestions for converting unused road space and incorporating greening into new buildings.</p>	<p>including reference to the importance of Priory Gardens as a space for residents, businesses and visitors.</p> <p>Requirements for new outdoor open space are set out in the Local Plan and Planning Obligations SPD. The SPD already references the Planning Obligations document, but this has been amended to refer specifically to green infrastructure and open space.</p> <p>Where appropriate, guidance in the SPD does refer to the importance of securing new public realm and green space.</p> <p>An additional reference to the London Plan 'urban greening factor' policy has been added to section 2 to highlight the importance of new greening.</p>
<p>There was broad support for retrofitting with a number of respondents considered that the refurbishment of existing buildings instead of rebuild, with the aim of reducing carbon footprint and pollution, would be much more suitable and environmentally friendly suggesting in particular that the college, leisure centre and Saxon Centre all lend themselves to a retrofit-first approach to reduce impacts from existing embodied carbon (a cheaper and greener option). Some respondents suggested that there should be a stronger requirement for retrofitting.</p>	<p>Change – the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p> <p>Detailed guidance has been provided for the leisure centre and Saxon day centre, and GN8 would also apply to any redevelopment of these facilities</p> <p>The SPD notes that the college building maybe appropriate for a retrofit approach.</p>
<p>Several respondents suggested that solar and district heating should be considered as part of new development.</p> <p>Some respondents felt that new development should meet or exceed current</p>	<p>No change – the Council agrees that renewable energy and energy efficiency are important considerations. These issues would be covered by relevant Development Plan policy, including the London Plan energy hierarchy. It is not necessary to repeat these policies in the SPD.</p>

Response	How has response been addressed?
energy efficiency standards and be carbon neutral in operation.	
A number of respondents noted the potential for an increase in air pollution as a result of new development and increased traffic.	No change – the Council agrees that consideration of the impacts of new development on air quality is important. Development Plan policies on air quality would apply to relevant development proposals. It is not necessary to repeat these policies in the SPD.
The Environment Agency noted that there is no reference to groundwater sensitivity and recommended that reference is made to ensuring water sources are not contaminated by polluting.	Change – the SPD has been amended to add requested reference.
<p>Several respondents noted that biodiversity must at the very least be maintained, raising concern about the potential impact of development on local wildlife / bird life and a variety of habitats – referencing colonies of bats, clans of badgers and Peregrine falcons nesting on top of the college (all protected in law). Other wildlife also referenced include at-risk amphibians, hedgehogs that require natural corridors, and pollinating insects which need native wildflowers. The impact of tall buildings on the flight paths of birds was also highlighted.</p> <p>A respondent recommended that SPD Guidance note 14 should specifically reference that development should achieve at least 10% Biodiversity net gain.</p>	<p>Change – the Council agrees with the respondents about the importance of biodiversity. The SPD refers to the importance of biodiversity, and relevant Development Plan policies would apply to development proposals. However, some of the suggestions would constitute new policy which is beyond the remit of the SPD.</p> <p>Reference to the Urban Design Guide SPD has been added to the SPD; this document includes a section on biodiversity.</p>
Respondents raised concerns that 'Infrastructure Delivery' (paragraph 2.15) does not mention capacity to dispose of all water to meet the objective of improving the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised, noting that the torrential rain from recent storms flooded streets.	No change – the Council agrees that flood risk is an important issue. Flood risk implications would be a relevant consideration for certain development proposals, in line with Development Plan policy including Local Plan policy 115. It is not necessary to repeat these policies in the SPD.
One respondent raised concerns in respect of paragraph 5.31 that overshadowing should not be addressed through carbon off-setting agreement.	No change – the Council agrees that on-site carbon reduction measures should be prioritised. This requirement is set out in London Plan policy, which states that carbon offsetting contributions are only acceptable where it is clearly demonstrated that the zero-carbon target cannot

Response	How has response been addressed?
	be fully achieved on-site. It is not necessary to repeat these policies in the SPD.

Table 11: Commercial uses (retail, leisure, office)

Response	How has response been addressed?
Orpington 1 st stated that the employment opportunities provided by the town must be central in the consideration of new development.	Change – the Council agrees that continued focus on a range of employment uses is important to ensure the ongoing vitality and viability of the town centre. The importance of commercial development is set out throughout the SPD, including as part of mixed-use development. Some additional references have been added, including to guidance for the Walnuts Shopping Centre site in section 6.
Orpington 1 st considered that much of the current portfolio of premises is unfit for purpose and needs replacing, but whilst the end use of commercial space is still being reviewed at a national level as well as local, future proofing capacity should be a requirement of planning. They added that High Street facing commercial units or spaces provide excellent visibility, access and improved security, so the relationship with the High Street should be a consideration in planning.	Change – the Council recognises the issue and the importance of ensuring retail space is fit for purpose. Local Plan policy 92 would cover these issues, and it is not necessary to repeat this in the SPD. However, guidance for the Walnuts Shopping Centre site has been updated to reference to the need to investigate a range of commercial unit sizes. Future retail policy will be considered as part of the ongoing Local Plan review.
There was general concern regarding the loss of (fully functioning) units (in the now withdrawn planning application). A number of respondents note that the small units proposed won't attract large retailers. One respondent stated that the proposed retail units are too small and will drive larger retailers away and won't address the demand for retail in the area. Others state that the replacement shopping centre should include a range of unit sizes large enough to attract popular national retailers, in addition to smaller units to attract independent retailers and small local start-ups.	Change – the Council agrees that provision of a range of retail unit sizes is important to ensure a functioning town centre. A range of retail unit sizes may be appropriate, depending on site specific circumstances; any units proposed would need to contribute to the vitality and viability of the town centre and ensure that retail function is not compromised. Guidance for the Walnuts Shopping Centre site has been updated to reference to the need to investigate a range of commercial unit sizes. Policy 92 applies to applications involving the loss or reduction of retail space; there is no need to repeat this policy in the SPD.
A significant number of responses stated the need for a stronger emphasis on retail and leisure uses. Some respondents noted the need to retain existing shops while others considered that the Town Centre needs	Change – the Council agrees that continued focus on retail and leisure uses (amongst other commercial uses) is important to ensure the ongoing vitality and viability of the town centre.

Response	How has response been addressed?
<p>better/decent/more variety of shops, in terms of the type of shop, the nature of ownership/operation (e.g. independent, family run) and also shop sizes (e.g. small shops). 'Nuts to the Walnuts' stated that the SPD should make it clear that if the Walnuts Shopping Centre is demolished new retail space should equal or exceed the floor area which has been lost. Another respondent suggested that there is continued need for an indoor shopping centre, whilst another questioned the need for an indoor mall.</p> <p>Some respondents were keen to see small interesting shops rather than large brand names, whilst others were keen to see large retailers encouraged to return. Many respondents were keen to see a mix of small, medium and large unit sizes / retailers, including units with the ability to convert/subdivide (adapt easily to change). One respondent noted that the bigger retailers can support the smaller shops and businesses.</p> <p>Some respondents noted that small local retail as a key part of the 'small Kent town' character of Orpington.</p> <p>Some respondents considered that the town centre did not need any further retail. One supported reducing the retail offer in replacement of leisure facilities. Another states that they are not against reducing the number of retail units and floor space in favour of housing and added that many retail units have storage space which is superfluous to the modern business model. One respondent considers the high street is too long and suggested concentrating retail between Tesco and the Walnuts to free up the northern end for housing.</p>	<p>The importance of commercial development is set out throughout the SPD, including as part of mixed-use development. Some additional references have been added, including to guidance for the Walnuts Shopping Centre site in section 6.</p> <p>Policy 92 applies to applications involving new retail or the loss or reduction of retail space. It is not necessary to repeat this in the SPD.</p> <p>In response to the many suggestions for new retail, planning can only focus on use classes, and can't specify particular operators or types of operators. However, these suggestions have been passed to the Council's economic development department for information.</p>

Response	How has response been addressed?
<p>Many respondents suggested particular named businesses or types of operators that should locate or remain in the Town Centre.</p> <p>Some respondents felt that more variety of uses would improve a perceived issue with vacancy rates.</p> <p>Many respondents identified particular types of retail or leisure use which should be limited, as they considered such uses were unnecessary or that there were too many of said uses currently located in the area.</p> <p>One respondent considered that the Council should get rid of Tesco as it has ruined Orpington and closed lots of shops, whilst another notes that Tesco was huge but benefitted local residents.</p>	<p>No change – the Council notes the suggestions put forward.</p> <p>As noted above, planning can only focus on use classes, and can't specify particular operators or types of operators. However, these suggestions have been passed to the Council's economic development department for information.</p>
<p>Orpington 1st welcomes the new cultural focus of the council and would like to see more support given in the SPD to ensure that the town centre provision reflects the major town centre status of Orpington.</p>	<p>Change – the Council acknowledges the importance of cultural uses and the benefits that they can bring to town centres. The SPD notes the importance of cultural uses, e.g. GN2.</p> <p>Development Plan policy, including the cultural policies set out in the London Plan, would apply to relevant development proposals; it is not necessary to repeat these policies, although a reference to London Plan policy HC2 has been added to section 2 of the SPD.</p>
<p>Some respondents raised the need for a decent market, including a suggestion for a permanent marketplace under a covered plaza.</p> <p>Orpington 1st noted that the current market and event spaces are hidden from view, reducing the benefit of activation to the wider town centre businesses. New developments should improve permeability into the centre and provide additional outdoor spaces for community use.</p>	<p>No change – the Council agrees with the respondents about the benefits of markets. The SPD highlights the importance of the market in section 6. Local Plan policy 100 would apply to relevant development proposals and is referenced in the SPD policy framework section.</p>
<p>Several respondents noted the need for better disabled access to shops.</p>	<p>Change – the Council agrees that inclusive design is an essential consideration for new development. The SPD has a specific inclusive' design principle which seeks the highest standards of inclusive design. GN5 also refers to relevant Development Plan policies that promote inclusive design. The SPD has been amended to include reference to the Urban</p>

Response	How has response been addressed?
	<p>Design Guide SPD, which includes guidance on inclusive design and shopfronts.</p> <p>It is noted that this policy and guidance will only apply to new planning applications. Issues of disabled access to existing shops is a matter for Building Regulations which operates independently of planning; it is not necessary to repeat their requirements in the SPD.</p>
<p>Orpington 1st also support the opportunity to redevelop part of college premises for mixed use. High quality, flexible, and digitally advanced workspace – alongside conference facilities and student accommodation, would all contribute to the town’s enterprise offer.</p>	<p>Change – the Council agree that the college is an important use within the town centre. The SPD notes the importance of retaining the college in the town centre; further reference has been added to clarify that policies 20 and 27 of the Local Plan will apply where development of the college comes forward.</p>
<p>A developer/landowner discouraged LBB from adopting the approach advocated in guidance note 17, i.e. utilising planning conditions to remove the provisions of Use Class E and to remove specific permitted development to protect the vitality and viability of the town centre rights. The respondent requests that this Note is reviewed to allow for flexibility of uses within Class E.</p>	<p>No change - GN17 is considered appropriate. It specifically states that conditions will be used where necessary, rather than in all cases, hence the guidance already has sufficient flexibility.</p>

Table 12: Public realm, permeability and connectivity

Response	How has response been addressed?
<p>Orpington 1st consider that clearly identified and funded management for the sustainability of public realm and public/private spaces is an essential component of good town centre planning. They note that the town requires improved infrastructure to accommodate both indoor and outdoor events; and that spaces should be designed with consideration for their end use, with appropriate services – electricity, water, hard standing, level ground, access, toilets - installed.</p>	<p>Change – the Council agrees that the public realm is an essential component of good town centre planning. The SPD notes the importance of new and improved public realm throughout. A further amendment has been made to include reference to the Urban Design Guide SPD, which includes guidance on public realm.</p>
<p>Some respondents sought improved / additional green spaces connecting the southern end of the town to the Cray Valley. Others stressed the need to improve and link open spaces to residents, specifically improving environmental links, e.g. cycleways, walkways and promoting</p>	<p>No change – the Council acknowledges the importance of green and open spaces and improved connectivity between existing and new spaces. There is broad support for such proposals in the SPD, but requiring them is beyond the remit of the document. The</p>

Response	How has response been addressed?
<p>walking across Orpington with signposting (e.g. distance and time to destination).</p> <p>One respondent welcomed paragraph 4.16 but would like it to go further, suggesting that the development of north-south connections should be part of a larger scheme to enhance the Cray riverway this would extend the route from its current southerly terminus at the museum right through the town to the war memorial along a traffic free route, with ultimate aim of a continuous traffic free walking route from the war memorial via the London loop to the newly opened England coast path at Crayford.</p>	<p>suggestions put forward have been passed to the relevant Council department for information.</p>
<p>A number of public realm issues were identified, with some respondents also suggesting public realm interventions/improvements to tackle these. This included improvements to paving, new street furniture, improved footpaths, new access routes and improved signage and lighting.</p> <p>'Nuts to the Walnuts' consider that the SPD should prioritise accessibility when designing public spaces and considering street layout. It should state that street furniture should not cause difficulty for disabled people navigating the town's pavements, particularly for visually impaired people and wheelchair users. The SPD should also emphasise the necessity of accessible public transport to existing and future attractions and facilities. These points were echoed by several other respondents who noted the need for better design and access for disabled people including wheelchair users.</p>	<p>Change – the Council agrees with respondents about the importance of public realm and notes the suggestions put forward; these have been passed to the relevant Council department for information.</p> <p>The importance of new and improved public realm is evident throughout the SPD. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm. This guidance emphasises the importance of accessibility and legibility.</p>
<p>Several respondents raised concerns about guidance regarding the aim for improved pedestrian permeability across the town centre, including guidance note 12 and figure 4 which some respondents assumed was a proposal to create actual new routes which would involve the demolition of existing homes.</p>	<p>Change – the Council notes the concerns raised. Figure 4 has been updated and further wording has been added to clarify that permeability improvements are indicative, not literal suggestions.</p>
<p>One respondent questioned guidance note 7 and how space 'above ground floor level' can be inclusively accessible. A podium space is likely to be only for the exclusive use of residents/occupiers of that development. Public space needs to be easily accessible, so this basically should be at ground level.</p>	<p>Change – the Council acknowledges concerns about accessibility of space above ground floor level. Such space can be accessible although this would need careful consideration including issues relating to privacy and access. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm and would apply to</p>

Response	How has response been addressed?
	any proposals involving above ground floor level public realm.
<p>Several respondents questioned whether the town centre should be a place to dwell, as set out in the vision.</p> <p>A respondent felt that the town centre was currently easy to navigate but would become problematic with increased density, courtyards, places and squares.</p> <p>Some respondents raised the potential for more disturbance resulting from improved connectivity.</p> <p>A respondent suggested that the SPD talks of placing benches in roads leading to and from the station (e.g. 'places to pause' referenced in paragraph 8.18) but considers this would be totally out of character for existing, quiet residential roads.</p>	<p>Change – the Council recognises the concerns raised regarding potential impacts of additional places to dwell and increased connectivity.</p> <p>The principle of the town centre as a place to dwell is considered appropriate, in terms of ensuring the town centre facilitates a diverse range of uses and activities to attract people and encourage them to spend time there, which could have significant social and economic benefits.</p> <p>Likewise, increased connectivity is considered to be desirable, as it helps users of the town centre navigate and improves access to the area. However, it is acknowledged that any proposals would need to factor in a number of considerations including potential for increased disturbance for residents. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm and designing out crime.</p>
A local group suggested that the SPD provide guidance for improving rear of High Street properties facing Augustus Lane and Berwick Road service roads.	<p>No change – the Council agrees that these areas have potential for improvement. Appropriate guidance for these areas is already provided in the Western Edge section of the SPD.</p>

Table 13: General comments (including comments relating to the Strategic Environmental Assessment)

Response	How has response been addressed?
There were a number of comments questioning the link between the production of the SPD and a private developer who, at the time of the SPD consultation, was seeking permission for a large mixed-use development proposal on the Walnuts site.	<p>No change – the Council can confirm that the SPD was drafted and funded solely by the Council, with no involvement or funding from third parties.</p>
A significant number of responses were direct objections to the now withdrawn planning application. Many responses criticised the level of engagement with residents by the applicant and the accuracy of the consultation materials that were	<p>No change – the responses to the planning application raised a number of issues that mirrored the issues raised as part of the SPD responses, e.g. opposition to tall buildings. The Council's</p>

Response	How has response been addressed?
<p>provided. A number of respondents, including 'Nuts to the Walnuts', considered that the responses to the planning application should be considered as part of the SPD responses.</p> <p>One respondent noted that the application had no consideration of the Equalities Act, and should not have progressed to an application. The council needs to review and reinforce the planning department as a result.</p>	<p>response to these issues is provided in tables 4 to 12 above.</p> <p>However, the (now withdrawn) planning application is entirely separate to the SPD. Issues such as the application consultation materials and the engagement undertaken by the applicant are not relevant to the SPD.</p> <p>It is not appropriate to consider responses to a planning application as proxy responses to the SPD consultation. The application comments were submitted in response to a specific development proposal, rather than broad planning guidance, and it would not be appropriate (or in some cases possible) to glean an opinion on the SPD from comments on the planning application.</p>
<p>Orpington 1st acknowledge the benefits of being located on the border of Kent (the London-Kent Gateway) but are clear that Orpington is part of Greater London, one of only 32 Major Town Centres in the region, and suggest that the local authority support businesses in promoting the town as being part of London. They would like to see greater clarity and emphasis being put on the town's location to prevent the misconception that Orpington is a small town in Kent. They add that the correct positioning and status of the town should enable officers to take full advantage of the opportunities and funding streams made available from the GLA, which can have a direct and positive impact on business and the community at large.</p>	<p>No change – the Council acknowledges Orpington's status as a major town centre. The SPD (and by extension the Local Plan and London Plan) are clear about this. The guidance in the SPD is aimed at ensuring that future development in the town centre is commensurate with its major town centre status.</p>
<p>Some respondents suggested extending the SPD area and Orpington BID area; suggestions were to extend to the A224 Cray Avenue / Court Road to include the entirety of Priory Gardens, High Street and Carlton Parade (which provides a focal point beyond the village). As the gateway to Orpington Town Centre, the approach from the A224 should be given due consideration in planning guidance.</p>	<p>No change – the Council recognises that these areas provide important functions. However, it is not considered necessary to extend the SPD to cover these areas, as the SPD focus is on the designated town centre and these areas are not within the town centre boundary as defined by the Local Plan. Carlton Parade is a designated neighbourhood centre in its own right.</p> <p>The BID boundary is not a matter for the SPD.</p>
<p>A local group considers that the SPD should help to create a green network connecting green spaces around the edges of the town centre and place the town centre at the heart of a 20-Minute</p>	<p>No change – the SPD includes a number of references to promoting sustainable transport and improving green infrastructure, which links to the principles referred to by the respondent.</p>

Response	How has response been addressed?
<p>Neighbourhood with the aims and objectives of creating a healthier, active, prosperous community. The group cites a number of sources in support of the idea.</p>	
<p>Nuts to the Walnuts' considered that Councillors and Officers should distinguish between positive regeneration plans which would enhance Orpington, and massive overbearing developments, which would not. The SPD should help Councillors and developers to do this by clearly setting out what is acceptable and what is not.</p>	<p>No change – the Council agrees that any development proposed in the town centre needs to enhance the area. The role of the SPD is to provide guidance to assist with the implementation of Local Plan and London Plan policies. It will be a material consideration when determining planning applications in the area. The SPD cannot set out a checklist stating exactly what is and is not acceptable ahead of applications being determined.</p>
<p>Nuts to the Walnuts' requested that the SPD state that Council Officers and Ward Councillors have a duty to liaise formally and regularly with residents regarding medium and large developments in the local area.</p>	<p>No change – the Council agree that community consultation on new developments is important. New developments would be subject to statutory consultation requirements, and applicants are expected to engage extensively with local communities when preparing development proposals.</p>
<p>Some respondents raised concerns about the SPD consultation, including the following:</p> <ul style="list-style-type: none"> • Criticism that the document link did not work. • Criticism about the lack of public engagement sessions either as face-to-face presentations or online. • 'Nuts to the Walnuts' recommended a variety of additional consultation techniques for future consultations by the Council and developers, including documents being made available in a variety of different formats and languages; and having a telephone answering service. • Lack of awareness of the consultation process and the opportunity to comment via Commonplace appears limited in duration especially given the context of the pandemic guidelines. This may have limited the quality and quantity of the feedback. • Need for a proper resident consultation with planning officers regarding what 	<p>No change - the Council considers that the SPD consultation was extensive and satisfied all statutory requirements. It was also consistent with the Council's adopted Statement of Community Involvement (SCI).</p> <p>The SPD was accessible on the website throughout the consultation period.</p> <p>The documents were available to view in hard copy. Regarding availability in other forms, the Council received no such requests. Had such a request been received, the Council could have considered this, in line with the Public Sector Equality Duty. The draft SPD and supporting documents were provided as accessible documents using relevant software, which is consistent with Council standards.</p>

Response	How has response been addressed?
they would like to improve Orpington and not what is being proposed.	
<p>TfL Commercial Development suggested including the redevelopment of Orpington Bus Station as a potential development opportunity, subject to any TfL operational requirements including bus-rail interchange being accommodated as appropriate.</p> <p>TfL state that they would be supportive of the redevelopment of the station car park and the introduction of a CPZ in the town centre and surrounding the station.</p>	<p>No change – the Council notes the suggestions, but consideration of these sites as potential development sites is more appropriate for the forthcoming Local Plan review.</p> <p>The introduction of a CPZ is beyond the remit of the SPD.</p>
The SPD should fully explore the potential of smaller sites away from the town centre with a view to dispersing development across the borough to accommodate families.	No change - the Council notes the suggestion, but this would be a consideration for the new Local Plan, rather than the SPD.
<p>‘Nuts to the Walnuts’ and several other respondents raised concerns about the financial robustness of developers (including a comment about a non-local non-British developer) and highlighted the risk of approved development not being completed and a new leisure centre not being delivered. ‘Nuts to the Walnuts’ consider that the SPD should state that a comprehensive financial risk assessment will be carried out before planning permission is granted to any developer undertaking large scale redevelopment projects in Orpington. Another respondent suggested that any development is phased to ensure that the leisure centre is completed prior to other development.</p>	<p>Change – the Council acknowledges the concerns raised, but such a requirement would not be within the remit of the SPD and is unlikely to be considered material to any future planning permission. Planning can ensure that developments are phased to require certain elements to be delivered in early phases. The SPD has been amended to include additional guidance on the leisure centre, which aims to ensure that any period of closure is kept to a minimum.</p>
One respondent criticised the lack of explanation of the vision for the Bromley Borough from the Local Plan of 2019 or how this has been aligned with in the draft SPD.	No change - the SPD vision clearly flows from the Local Plan vision, and informs the guidance in the SPD.
A developer/landowner with a land interest within the town centre was supportive of the underlying principles that the SPD seeks to deliver for the town centre; but considered that there are a number of Guidance Notes within the document that are unduly	No change - the guidance notes are considered appropriate in terms of the level of detail. The SPD provides guidance to assist with the implementation of the Local Plan; it does not set out new policy.

Response	How has response been addressed?
restrictive in the absence of a full evidence base.	
One respondent suggested that the SPD should seek to retain Lynwood House which is adjacent to Site 12.	No change - the guidance in the Orpington Station & York Rise is considered sufficient to guide any development in this area, particularly paragraph 8.20 which states that new development should seek to compliment local heritage assets.
A local group suggested an amendment to celebrate connections with Eltham, Orpington's nearest Major Town Centre, as Seely and Paget, the architects of the former Orpington Library (adjoining The Priory) had previously created the controversial Art Deco extension to Eltham Palace.	No change – while the suggestion does highlight an interesting historical connection, an amendment to the SPD is considered unnecessary.
A respondent felt infill developments should be avoided and others queried references to “Historic gaps” (in the SPD Vision), ‘so-called’ undeveloped or underdeveloped areas.	No change – the Council acknowledges the concerns raised. Infill development is suitable in principle, but the suitability of specific proposals would depend on site-specific considerations and would be assessed against a range of policy and guidance, including the SPD. Reference to historic gaps does not mean they will be developed; enhancement could include improved connections.
Respondents noted that the SPD has split Orpington into zones, but felt that consideration should be given to the impact of its decisions in one zone, on other zones, and the character areas should be treated as a coherent whole not developed in isolation from each other.	Change – the Council acknowledges the response and notes that this is the intention in terms of how the SPD should operate; the character areas are not self-contained. Reference to this has been added to the SPD for clarity.

Appendices

Appendix 1: summary of Commonplace question responses, by theme

Themes

1. General comments
2. The future of Orpington Town Centre
3. Housing
4. Transport infrastructure
5. Offices
6. Retail, culture and leisure
7. Public realm, permeability and connectivity
8. Historic environment
9. Green infrastructure
10. Environment and air pollution
11. Development opportunities

1 **General comments**

14 responses received in total

What should this guidance include?

General

- Needs a vision of what Orpington can be / look like before any detailed planning guidance
- Guidance must be in line with excellent air quality, a car-free future and to allow safe spacing for the current and future pandemic
- Individual events seem like a flash in the pan rather than a regular, well thought out strategy which complements the town centre.
- more culture, street life, range of shops ,farmers market, active travel,

Specific issues

- inclusive
 - places for youth to hang out
 - low cost to community groups, eg. baby classes, hobby groups to alleviate isolation.
 - Seating in the walnuts esp for those with restricted mobility
- Existing quality buildings should be respected and enhanced - eg GPO.
- concentrate on making the town centre more child friendly
 - indoor soft play centre
 - fountains/play equipment.
- Development
 - Any development is assessed to be carbon-neutral, using green energy and promoting active travel.
 - Stop the dense development of small flats
 - build affordable housing - social housing and / or key worker housing
- encouraging a more mixed use, environmentally friendly space.

- Encourage major stores, independent shops and reduce rents for local shops.
- Opening unused shops for community projects, art studios, galleries and drop in centres for elderly or disabled people
- market to attract a greater number of stalls including local craft stalls
- Update the swimming pool
- More police or security during the evening periods / Priory Gardens
- Transport and Parking
 - restrict High St parking – but avoiding chaos on surrounding roads - parking and buses
 - Incentivise car free visits to the town centre.
 - Measures to alleviate traffic between war memorial and Orpington station, particularly during rush hour/school run periods
 - Parking provision to ensure no shift to Bluewater (free parking)
 - Potential for park & ride?
- Access to the town centre with safe pedestrian and cycle (scooter etc.) access.
 - Safe cycle stands.
 - Wider pavements, especially eastern end,
 - Option for making some of High St buses only
- Improve / refurbish Bowling Alley
- Priory Gardens
 - a cafe & a public toilet
 - improve security

2 The Future of Orpington

34 responses received

What do you think makes a good Town Centre?

- Attractive, safe, diverse, clean, and inspiring.
- Clean, safe, comfortable, easy to walk around, places to meet, green spaces, space for community events, useful/ affordable/ relevant shops, offices, community services.
- Multi trip destination (town centre & local parks/greenspaces)
- Make it 'a destination' with character - retain the village character, trees and plants and pavement cafe culture
- Appealing to all age groups and cultures / everyone living around
- attractive & clean town centre – repair dilapidated units/buildings,
- Safe & friendly to visit to use and socialise. Attractions for all ages not necessarily at the same time of day (bars, restaurants, parks, library). – enhance security after school / evenings
- Prioritise pedestrians / pleasant outdoor seating spaces
- Interest points / activities ... an art trail / regular events
- Good maintenance of infrastructure and good litter collection

Uses

- Variety of uses - accessible for all, promoting environmental sustainability
 - Local produce shops, charity shops, green refill shops, restaurants and cafes, leisure centres, library, cinema support centres, range of shops which reflect local cultural groups, community hub - youth facilities, places of worship and necessary amenities for the elderly

- quality shops (big name stores & independents) restaurants – concern re proliferation of ‘nail bars and less vape shops’
- leisure attractions to appeal to all types of people
 - Young People - Somewhere to meet - safe and out of the weather (currently only MacDonald's.)
 - multi use places for families (play cafes, ceramic cafes etc) and local groups to meet.
- Reduce the empty shops - sensible unit re-use of consistently vacant units - pop up stores
- weekly (Sunday?) market in the High Street, pedestrianising the south section between 11.00 and 15.00. - improve social interaction / sense of community..
- more residential options

Environmental issues, green spaces, transport

- Reduce and eliminate pollution / carbon sources, ref Global warming
- prioritise the pedestrian (safe & welcoming)
 - limit private vehicles to the high street to make it feel more vibrant & safer
 - divert buses through Homefield Rise and Gravel Pit Way (eg to facilitate weekly market)
 - consider complete pedestrianisation
 - space for social distance (2m apart)
- cycle lanes, cycle storage
- more charging points / free or reduced rate parking to encourage the switch to electric cars
- Wide footpaths; wheelchair and buggy friendly.
- Good transport links
- reduce noise,

Public Realm

- Active and vibrant public function at the ground floor level, small architecture (benches, light etc) and green squares (lively public spaces)
- adding more green areas, open natural spaces, trees and seating areas
- Suggested enhancements
 - create a focal point eg. "meet me at the big clock".
 - a bandstand or stage area for local musicians
 - A water feature of some kind, like a spectacular fountain or waterfall wall, to provide focus and contemplation
 - pavement based water fountain for play space
 - Lots of benches and shaded areas for hotter summers

Economic Interventions

- variety of shops should be supported through rates relief and grants
- subsidise space for artists, designers, craft bakers, micro brewers
- fill empty units with community uses etc.

Specific Places

- Walnuts –
 - knock down the and move shops to the high street
 - add some features to the courtyard area
- Priory gardens - Invest to make more family friendly and safer

What would you like your area to look like in the future?

- Vibrant and busy with fewer empty shops & more variety (support start ups)
- Clean, greener, eco friendly, Less pollution and noise from cars and buses and more spaces to sit outside to eat, drink, socialise.
- reputation as being a specialist provider perhaps for hobbies / crafts, or antiques (linking with the historic Priory) – charity shops recast as ‘vintage’
- a good mix of living space, open space, parking, shops, cafes, bars etc
- cinema hotel and good restaurants are still here & more leisure facilities
- a more attractive shopping centre (and entrance)
- easy access to transport, better pedestrian and car free areas
- more al fresco cafe / dining options
- legibility
 - The different parts of the town are linked together
 - a central green space surrounded by places to eat/enjoy a coffee outside,
- Movement / Transport
 - A less congested environment- tailbacks from Tescos and the station often cause traffic queues in the high street with resulting air pollution.
 - Free flowing traffic to encourage footfall and visitors.
 - Pedestrianised High Street - Route the traffic down gravel pit way
 - Lots more space for pedestrians and cyclists
 - walking route which is under-cover
 - a cycle path.
 - Electric buses
- Parking
 - Only genuinely essential (disabled) parking in the High St (with EV infrastructure)
 - good local parking which helps to keep the High Street vehicle-free
- Development / Refurbishment
 - New housing blends in with the surrounding area.
 - refurbish dilapidated flats above High Street shops – for social housing
 - High Street is refreshed, but not too tall, or over-developed
 - more flats so that people can live locally to the centre of Orpington
- Economic suggestions.
 - free loans to charities, colleges, schools, organisations for exhibitions, pop up shops, etc.
 - place for locally run businesses to develop,
 - place which provides support for many groups in the community; youth, elderly, homeless, job seekers
 - shops appealing to the youth - bring the college students into the high street and increase footfall
- Features
 - Priory Gardens
 - A new cafe in the park
 - More events in the e.g. historic re-enactments (jousting?)
 - more equipment & split younger/older children sections.
 - Walnuts
 - more trees/grass, tables, shade
 - ugly leisure centre block to go
 - community use of the paved area outside the back of the Sports Centre eg baby swings, friendship benches and chess tables
 - free activity based outdoor leisure like a cycle path, boating lake etc.

- water refill stations
- water feature or clock or art- work
- permanent public notice board in the library window,
- a regular market on the high street rather than in the Walnuts with arts & crafts, art exhibitions
- New bowling alley

What could the town centre offer that it does not already?

- greater range of retail -specifically
 - chains
 - M&S
 - Aldi or Lidl
 - Primark
 - traditional (eg fishmonger, butcher, deli)
 - cycle shop
 - specialist shops
 - Shop selling local products
- greater range of community leisure & culture -specifically
 - up to date public leisure centre
 - Alternative uses for the empty shops such as youth and childcare services, for local kids or community projects
 - Regular specialist markets inc German / Farmers market
 - Art gallery or exhibition space - local history exhibition
 - Escape room (similar to Operation Escape in Bromley)
 - Increased use of library facilities by community groups eg evenings
 - More community toilets
 - Youth
 - Area to be safe and comfortable without being moved o
 - skate park
 - Water fountains to fill up bottles
 - Community hub inc CAB / space for social enterprises.
 - contact point for police
 - Bingo hall,
 - snooker hall,
 - casino
 - Public bins are separated into recyclables
- Late night shopping (Thurs)
- A feature
 - Town clock
 - eg an upside down house (as in Brighton) or similar exhibit
 -
- Pedestrianised high street
 - alfresco dining
 - Cycle lanes and area to safely lock bikes and scooters
- More family friendly focus, Cafe/play area, for parents/child minders
- Greater police presence at night - cars using the high street as a race track
- Green Environment
 - More plants and trees.
 - green area and seating locations along the High Street

- leave verges uncut to increase insect population especially bees.

Do you have any other comments in relation to planning for recovery post-COVID 19 and adapting to changes to the role of town centres?

- Bars - Retail is declining however Orpington is becoming a center for bars and restaurants
- some retail could be converted into office or nursery schools, as there is a shortage of both.
- Offer empty spaces to new/upcoming community events and organisations.
- Focus on small businesses, shopping local.
- local smaller shops (especially green focus, such as refill/zero waste)
- nicer places to socialise/spend money.
- spaces for home workers to take a break, if they have no private open space.
- Shared spaces/ hot-desking for hire for those not commuting, with office facilities
- Full pedestrianisation of the High Street will provide for generous social distancing.
- Lower rents to help struggling businesses - be flexible on Change of uses
- Green space
 - all local green spaces should be invested in to improve attractiveness & safety - Priory gardens should be a big focus
 - Protect existing parks and green spaces and expand their number and size
 - encourage strong links in new developments to local green spaces (for mental and physical wellbeing, for cleaner air and carbon capture, for nature and wildlife).
 - Increase areas managed for biodiversity and allow some areas to develop naturally.
 - Replacement trees with equal canopy size.
 - Safe active travel needs to be first and foremost

3 Housing

15 responses in total

How we can best accommodate residential development within the town centre to complement the commercial role of the centre?

Locations

- Convert empty shops / space above shops
- use empty commercial space
- near the station (attractive to commuters)
- shortening the high street
- brownfield land

Requirements

- High quality, well-maintained & secure housing.
- requirement for additional schools, childcare, doctors, public transport pedestrian and cycling-friendly paths, roads, parking etc to accompany additional housing.
- need for outdoor space to accompany residential development.
- build sustainability and low environmental impact as standard, and with an eye to future climate adaptation (monitor water availability)
- low rise and plenty of green space
- family housing needs space

What type of housing should be the priority?

15 responders in total – many have ticked more than one type of housing as a priority in their response;

- Affordable home to rent - 9 responses
- Affordable housing to buy – 11 responses
- General market housing to rent – 3 responses
- General market housing to buy – 5 responses
- Houses of Multiple Occupation (HMOs) – no responses
- Student accommodation – no responses
- Supported housing for vulnerable people – 6 responses
- Other – 2 responses suggest Key worker, one suggests flats priced for first time buyers.

Is there a particular housing size that should be prioritised? (as above 15 replies, have ticked more than one size unit as a priority).

- One-bed homes – 3 responses
- Two bed homes – 11 responses
- Three bed homes – 5 responses
- Four + bed homes – 0 responses

Do you have any other comments in relation to housing in Orpington Town Centre?

- Need for high quality affordable housing for young people as well as key workers and their families
- Ensure the necessary associated infrastructure is also provided including public amenity and green spaces (including roof gardens)
- Homes within walking distance / good public transport / cycling options will help avoid an increase in car use in Orpington
- Development should not limit retail (building on delivery space / car parks)

Design

- be good quality to be fit for the long term
- Tall buildings need to blend in with their surroundings, not block light and feel oppressive and over-developed (examples of increased height in redevelopment -Tesco, Orchard Grove, police station redevelopment)
- incorporate communal work from home - eg atrium space
- Energy efficiency / environmental impact
 - retrofit existing dwellings / PV panels
 - new buildings should meet higher standards of energy efficiency and shared ground source heating should be used.
 - resist energy inefficient building.
 - Non-permeable materials used on driveways
- Insulation, ventilation, refuse issues addressed (overheating, soundproofing)
- Restriction on buy-to-let to build community
- Using brown sites for housing is better than chipping away at Green Belt.

4 Transport and Infrastructure

20 responses in total

How important is walking, cycling and public transport for the success of town centres?

17 responses all very supportive

- Important, Massively, extremely very, paramount, increasingly, vital
- walking is most important, then cycling.

- often the only transport options of the young.

Air quality & Town Centre experience

- reduced motorised traffic
- improves air quality
- makes visiting the town centre a more pleasurable experience.
- vital for the footfall for local businesses and facilities
 - tap into active travel potential of local catchment
 - attractive, more pleasurable / leisure experience, healthy, sustainable and vibrant town centre
- Accessible / fuss free
- motorized traffic makes the High Street noisy and polluted & doesn't encourage families with young children to feel relaxed and safe.

Walking

- Wide pavements
- Pedestrianisation
 - would encourage people to stay longer and browse more.
 - traffic can be diverted - & is when there are events each year, attracting hundreds of people.
 - It would be great to be able to sit outside at the restaurants and cafes in a safe, clean and quiet space.

Cycle

- More cycle infrastructure
 - safe cycle routes esp for young people
 - Secure cycle parking

Bus travel

- Need good bus access
- Greener bus travel

What opportunities are there for new or enhanced walking and cycling routes in the town centre?

Cycling

- safe cycling routes / segregated cycle lanes (9 supportive responses)
 - through the high street.
 - wide enough for children to use safely.
- Cycle infrastructure
 - Bike racks

Car traffic

- sections of the high street car free or one-way only for cars.
- close off the traffic / Pedestrianise the town centre x6
- busses kept to drop offs at either end (plus middle, accessed from behind the Walnuts)
- diversion routes which are used during events which should become permanent

Parking

- remove on street car parking on the high street
- Sainsbury's multi storey car park is half full

Public Realm

- Orpington is becoming a hub for cafes and restaurants - people love sitting outside these facilities...but it could be so much more popular with removal of the traffic from High Street. (eg New Road in Brighton!)
- Better connection from station to high street.
- Healthy Streets guidelines – prioritise for health & wellbeing of people of all ages and mobilities <https://healthystreets.com/>
- create/improve active travel routes to/from and within the Town Centre to embrace the Prime Minister's Gear Change vision - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf
- enhancing and improving existing routes along paths and streets so they are safe and attractive for 8 to 80 year olds

Buses

- Must be frequent and affordable.

Road / Highway

- The roundabout by Lloyds is not safe and does not prioritise pedestrians.
- raised areas of road should be made into legitimate crossings (cause confusion as pedestrians believe them to be crossing areas)
- Cycle dangers
 - Carlton Parade, approaching from Sidcup, turning into Orpington High Street is dangerous and intimidating. There should be a shared cycle/foot path all the way from Nugent Retail Park to the High Street instead of the cycle lane transferring to the road halfway there.
 - drivers dangerously overtaking cyclists ON THE ROUNDABOUT. To solve this, a dutch style roundabout (one is already in place in Cambridge) would immediately solve this issue and severely reduce the risk of an accident
 - Tackling severance at both ends of the high street is key to making the town centre an attractive destination to cycle to.
 - War Memorial roundabout is hostile to vulnerable road users,
 - one way system near Priory Gardens is designed for traffic flow rather than active travel."

Does car parking have a role in future? Should development in Orpington Town Centre be car-free?

- 5 responses wanted car free dev or car free High Street
- 8 sought much reduced numbers of cars but acknowledged some needs (mobility / delivery etc) and a number highlighted EVC where parking provided
- Several noted the existing provision in 2 multi stories & how they could be accessed One noting need to compete with Nugent
- One felt there would be continued demand

Parking

Restrict Car Parking

- responsibility to the environment and to our children.
- Would ease bus movement
- Supported by more frequent / reliable buses.
- Reduces congestion & makes Town Centre more appealing

Allow Car parking

- needed for people
 - with mobility /health issues / elderly;
 - parents with small children;
 - people with heavy shopping.
- will be in demand for years to come
- only in existing car parks not on the High St
- existing car parks needed (access to Walnuts via Gravel Pit Way) to prevent drain to Nugent

EV Charging

- If parking has to be provided, should have EV charging facilities.
- More charging points should be installed for electric cars.
 - in car parks and on Lych Gate Rd

Ped / part ped High St x8 responses

- previous attempt at Pedestrianisation unsuccessful - the reasons for this should be re-visited.
- difficult to cross the street with children because of all the terrible driving
- parking only in walnuts & Tesco
- other routes around it including to the two multi storey (Walnuts and Tesco's) car parks and the disabled parking area
- get rid of through traffic.
- Pedestrianize between the Walnuts roundabout and War Memorial roundabout
 - Buses and Bikes and ESSENTIAL deliveries only - other traffic travelling via Gravel Pit Way
 - Buses vis Gravel Pit way too
- Active travel, Bicycle paths / secure cycle parking and pavements should take priority.
 - safe cycle lanes continuing along Sevenoaks Road to Green Street Green High Street

Car Free Development (future)

- Two specific refs - both yes

Are there any improvements to public transport that you would like to see? How can access to Orpington Station from the High Street be enhanced?

High St

- reducing traffic on the high street, perhaps by making all / part car free
- buses make slow progress through the high street
- Divert buses off High St / Bus hubs at periphery of high street, x2
- Electric buses only in High St
- Widen pavements

Route to Station A232 (TfL)

- walking route between the station and Tesco is poor / clogged
 - raised tables / crossings on side roads along A232
 - widen pavements
- better wayfinding and lighting via the back of the station to town centre including via Knoll Rise
- buses only on Station Rd cars only on Tower road (too narrow for buses)
- more greenery

- air quality monitor
- optimisations to the traffic lights to improve the flow up towards the station ?
- cycle and scooter lane (with storage).
 - Electric scooter hire (if legal)

Buses

- buses make slow progress up to the station.
- dedicated shuttle bus -
 - station to war memorial
 - Orp Station - SMC station– (via High St - Carlton Parade, Cray Avenue / Nugent)
 - Orpington station to Biggin Hill, (via airport, & planned hotel and College).
- More frequent buses from outlying suburbs/villages – including new dev at Fort Halsted
- an X51 service (51 overcrowded in the peaks)

Train routes

- direct services to London from Chelsfield station - recent alterations mean changes at Orpington - draws commuters to drive to Orp Stn at Orpington

What do you think are the priority infrastructure requirements for Orpington Town Centre?

- Prioritising cycling and walking then public transport
- Create cycle / pedestrian network spine (cycle routes / safer pedestrian crossings) and Mayfield Avenue / Knoll Rise towards High Street and Priory Gardens
- Progress Orpington to Green Street Green Walking and Cycling Route improvements 2017 - <https://cde.bromley.gov.uk/documents/s50051764/Proposals%20for%20improvements%20to%20the%20Orpington%20cycling%20and%20walking%20network.pdf>
- Complete shared walking/cycling route from Crittalls Corner to Orpington Town Centre - currently stops short of Carlton Parade
- cycle routes & infrastructure (racks) x7
 - High Street
 - along Sevenoaks Road to Green Street Green High Street.
 - into local neighbourhoods
- municipal bike scheme

Walking

- improve/upgrade existing walking routes and footpaths
- better signage for healthy routes in/around Town Centre
- pedestrianisation

Station

- easy linkage to high street without creating more traffic on that stretch of road.
- National Rail / Southeastern improvements to platform underpass and links to emerging Crofton Road upgrade (to).

Drainage

- Valley location – inc risk of flooding as weather changes / global warming
- Good time to address during major redevelopment / changes

Do you have any other comments in relation to transport and infrastructure in Orpington Town Centre?

- Full / partial / occasional pedestrianisation
- Encourage walking and cycling (cycle lanes on the residential streets, along with pedestrian crossings, traffic calming, for a more healthy population).
- Act (eg cycle lanes) not just talk in platitudes about intentions regarding these features.
- Electric buses
- There needs to be more done in terms of traffic calming and enforcement
- Liaise with local people , residents associations and relevant organisations / stakeholders, e.g. Bromley Cyclists, Bromley Living Streets, Bromley Ramblers, EnBro.
- Concern about Rat Running (The Greenway – north of Orpington)

5 Offices

5 responses in total.

How can the employment role of the town centre be maintained and improved?

- Local jobs website regularly updated
- Offer flexible workspace
 - incl. cafes that allow workspace
 - meeting venues
 - co-working space,
 - ideally low-cost to support start ups and small businesses.
- target
 - the digital sector
 - young professionals
- showcase Orpington based businesses,

What type of office space do you think will be necessary to ensure that the town centre can adapt to changes in the way people work?

- FLEXIBLE workspace -a key comment.
- Rentable, flexible, co-working, low cost, hot desking,
- Good quality to attract young professionals and different sized businesses.

Do you have any other comments in relation to offices in Orpington Town Centre?

- Attract businesses and workers to the town centre (but don't waste money)
- convert empty unviable office to housing.

6 Retail leisure and Culture

13 responses in total

Does Orpington Town Centre's retail offer need to change to adapt to changing circumstances? If so, what changes do you think could be put in place to facilitate this?

Retail

- Too many food establishments inc restaurants, takeaways, cafes,
- Too many charity shops and empty units
- Reduce rental / find tenants
 - more independent retailers

- shops that embrace the growing community feel as a refill shop for dried food, cleaning and toiletry liquids, as well as a repair shop/cafe and a lending library (for DIY tools, electricals, partywear and garden tools).
- accessible, 'trendy' and child friendly restaurants/bars/cafes
- Pop up markets / indoor market in larger vacant unit
- focus on personal services that are best served locally, so leisure, restaurants, bars, dentists and hairdressers

Leisure & Culture

- Walnuts Sports and Leisure Centre - retain and update (note - phase as no other local swimming pool)
 - Gathering / sitting area to encourage street life eg musicians
 - Ice skating rink/roller skating rink
 - Skateboard area,
 - The High Street
 - pedestrians only with relevant affordable parking locally
 - consolidate the shops in a smaller area (one end of the High Street) and release the space to other uses such as housing, recreation.
 - is too narrow for public transport to use it safely.
 - Crossings should be linked so that traffic flows freely.
 - pavements re-laid to reduce puddles
- more homes and offices in the town centre

Do you see the town centre as somewhere you can socialise?

Attractors

- its nearby ! less inclined to go to London
- Walnuts Sports and Leisure Centre,
- Restaurants
 - choices limited but recent restaurant openings (GPO, Pato Lounge and The Orpington) have attracted some back
 - a 'walk to' dinner destination
 - not too different to the offer at Locks Bottom and Petts Wood.
 - Suggest more outdoor seating for restaurants and bars
- Cinema

Detractors

- Concern about safety
- Traffic noise & air pollution
- crowded pavements / pinchpoints

What type of space is necessary to facilitate or improve the cultural and social role of Orpington Town Centre?

- Large art / events space - Walnuts shopping precinct inadequate - split into two relatively small areas which can become overcrowded
- Use inner square for community events,
- pop ups, better quality market stalls
- Supported spaces for social enterprises / community events/learning - with long term sustainable funding.
- a 'little theatre' used culturally throughout the day with evening shows,

- Car free areas so restaurants can spill out
- More open space

What leisure activities/facilities would you like to see in the town centre?

- Retain & enhance the Walnuts (with provision throughout refurb)
- More activities and places for children, families and young people.
e.g. Places to play and learn music, art, dance, drama, roller skating rink, winter ice skating rink, gymnastics, mini golf, social darts, ping pong, skate boarding, swings, exercise circuits, benches, café, soft play, no alcohol 'games den'
- Improve the existing bowling
- Integrate existing facilities (cinema & bowling) better with the town centre.
- Theatre, art spaces, community spaces, all with long term sustainable funding.

Do you have any other comments in relation to retail, culture and leisure in Orpington Town Centre?

- Should be more people focussed rather than commercial and car focussed
- Events
 - eg the big screen (previously outside the old police station), Lighting Up Festival, Orpington Rocks Festival
 - locations - use the High Street more, War Memorial
- More diversity of business

7 Public Realm, Connectivity & Permeability

8 responses received in total

How inviting is the town centre public realm currently? What elements of the public realm do you think are good and bad?

Good Public Realm

- flowers / Flower towers
- in front of the cinema, with extra outside seating
- Green walls in front of empty shops
- Speed tables (pavement to road)
- paving
- the cinema and the buildings nearby
- bike racks encouraging cyclists (although under utilised at present)
- Good / Improved general
 - Cinema
 - Independent restaurants
 - supermarkets, banks and opticians
 - Village Halls

Bad Public Realm

- pavements are crowded and cars dominate the town centre – can feel noisy & polluted
- too much heavy traffic (inc buses) on the high street (dangerous place with small children)
- limited opportunity to widen pavements or include cycle provision.
- Entrance to the Walnuts between the leisure centre and the college, including the bridge, are dated and unwelcoming not very inviting

- Too much concrete on some buildings
- Some buildings look tired and uncared for
- The market is generally poor
- Bad general
 - Too many empty shops
 - No big retailer
 - Nugent offers better shopping
 - Weekend crowd are off-putting

What could be done to make the town centre a place where people will want to dwell?

Transport & Highways

- Pedestrianise / less traffic on the high street,
- Provision of storage/parking for bikes, e-scooters, motor-bikes & other vehicles

Visitor experience

- Unique character that sets in apart from other town centres “celebration of local achievements: Dina Asher-Smith (athlete) , Reggie Perrin (character created by David Nobbs); the 1920’s Orpington car; the Romans etc. etc.
- more interesting shops, i.e.
 - a bookshop, fashion, eco-shops
 - fewer or rebadged charity shops as ‘vintage shop’
 - local community hub for info / lost property /police contact point
- Fill vacant units - retail or leisure activities
- Enhanced greening / more planters
- Safe, clean, well-lit spaces and benches to rest.
- Light & airy so you can see the sky
- Well maintained commercial and residential buildings.
- Refresh / enhance leisure centre offer
- shared spaces for people to get a break from working at home.
- Enhance public realm in front of the Walnuts leisure centre e.g. planting; or maze or hopscotch painted on the ground for children

Homes

- Well-proportioned, energy- efficient housing, with good insulation, ventilation, and access to green space
- Homes that are not generic square blocks
- Play area for children close to new flats

How easy is it to navigate through and within the town centre?

Active travel

- The town centre is easily navigated on foot once you are in the High Street. However
 - Side streets that junction on to high street can be difficult to cross
 - Leisure centre entrance should be better integrated with the town centre
- Requiring improvement (eg maintenance & lighting) and / or signposting
 - access the leisure centre from the high street (steps not obvious)
 - River Cray path (north from Priory Gardens to the Nugent)
 - Path between the Walnuts and Priory Gardens.
 - The footpath over the bridge

- Walking and cycling route from Orpington Station (to Hillview Road and from Elm Grove to Knoll Rise).
- street furniture (bus stops, bins, signs, seats, etc) can create pinch points (around McDonalds, outside the old Post Office/Boots and by Edinburgh Woollen Mills)

Cars

- should not to navigate through the town centre, as there are alternate routes available.
- Pedestrianize with clear cycle lanes and room for invalid vehicles.

8 Historic Environment

10 responses received in total

How important is the historic environment to the character of the town centre?

- Very - a critical part of its unique local cultural identity & character, distinguishing Orpington from other places incorporating
 - Roman settlement
 - the Priory,
 - Railway generated development like the Knoll area

Benefits

- Prosperity - High Streets with unique features prosper - many high streets / shopping centres have been sanitised and look the same – *'the Walnuts is a just a walk through to get out of the rain'*.
- shared interest for residents, and can bring generations together.

Enhancement

- local history should be better identified and enhanced
- highlight unnoticed historic characteristics - facades above High Street.shops

What elements of the historic environment do you consider most important?

- Priory and Priory Gardens Conservation Area - but concern about the Priory
 - hidden / obscured
 - contents of the former museum
 - lack of public use
- Roman remains
- Early mock Tudor buildings
- Heritage buildings related to past commerce & industries
- Gabled shops along the linear High Street (new buildings should be required to blend in.)
- Natural environment – historic trees and green spaces

How can development be accommodated without causing harm to the historic environment?

New buildings to locate on 'brown' land, seek comment and confirmation from the community, and should be

- in context and in keeping with the existing development - sympathetic aesthetic to the existing buildings – don't juxtapose modern with historical
- similar height, - slightly higher if replacing blocks in the Walnuts but not directly adjacent to existing residential properties or towering on their skyline.

- similar materials - flint walls would mirror the Priory walls

Potential to preserve & enhance the historic environment

- showcasing history eg the new Orpington GPO, - template for future developments
- preserve facades and imitating existing facades
- no new development to obscure historic buildings

New development to enhance & celebrate the historic environment

- footpath link between the Priory & Priory Gardens, and the Walnuts / High Street (Dryden Way/ Lychgate Road to Bark Hart Road). – suggested like improvements to the Nugent Centre path through trees and past the stream, with a water feature.
- Reflect how historic towns like Canterbury, Richmond and even parts of London like Chancery Lane and St Paul's blend the ancient and modern in aesthetically pleasing ways.
- Involve experts in historic preservation and sustainability. "
- Careful selection of developers (for Council schemes)

Do you have any other comments in relation to the historic environment in Orpington Town Centre?

Enhance / develop local displays (currently at the Bromley town centre library), Crofton Roman Villa, the Priory buildings, Biggin Hill, connections with David Bowie as well as nearby National Trust, English Heritage and other historic sites.

Public Realm enhancements

- Improve heritage related signage
- local history walking trail with links to websites
- use or reflect former museum artworks in the new public realm – seek sponsorship e.g. the 18th century fire engine (not as big as it sounds) could be sponsored by an alarm company?

Priory building should be

- occupied by artists- new commercial activity could be linked to V22's planned artists occupation
- open to the public (at least occasionally), and school visits should be resumed

Art / Crafts area (note increased hobby activity during covid)

- retail area/ inside market space for arts crafts & hobbies - with retail & gallery space
- baking & cooking/ Painting / Drawing / Pottery / Ceramics / Crafts / Cameras & photography / Sewing / knitting / Crochet / haberdashery / musical instruments "
- community sharing of oral histories, photos and artistic representations of Orpington through the ages as well as a vision for the future.

9 Green Infrastructure

19 responses in total

Do you think provision of green infrastructure in town centre locations is important? What advantages and disadvantages does green infrastructure bring?

Only advantages –

- Contribute to sustainability, biodiversity
 - Enhance wildlife / offset biodiversity loss
 - pollinator corridors,

- improved water management/drainage
- mitigate climate change
- improving air quality through pollution /CO2 reduction
- connects people with nature in urban settings.
 - Esp those without gardens
- aid economic recovery by increasing footfall
 - people attracted to a more environmentally friendly town centre environment, character / friendly & inviting
- contribute to health / mental and wellbeing
 - Savings to the NHS with a healthier population
 - Encourages exercise
- Community / place quality
 - sense of community, meeting opportunity (inc young people), seating, belonging,
 - events potential
 - respite from workplaces
 - responsibility to take care of the area that you live in,
 - teaches children the advantages and normalises sustainable living
- Combine Green Infrastructure with
 - cycle routes and safe bike storage to encourage people to leave their car at home
 - safe crossings and more solar powered lights for pedestrians to feel more comfortable walking

What type of green infrastructure do you think is most suitable for Orpington Town Centre?

Value of Green Infrastructure

Existing

- promoting the green spaces which already exist,
- existing mature trees on the High Street and around the war memorial – a delight

New

- network of green spaces, connected by urban hedgerows, flowerbeds,
- Parklets,
- planters, (including hanging baskets) / supported by shops - Orpington in bloom competition etc..
- trees,
- green walls, -visually appealing, whilst reducing air pollution and increasing biodiversity – on all new dev (eg Walnuts)
- green roofs – also ‘growing space’
- wildlife areas / meadow corridors - to encourage insects and birds
- borders, - shrubs & bedding / along cycle routes and pedestrian paths
- water spaces new and existing better maintained
- Sustainable Urban Drainage Systems (SUDS)

Also

- Semi-permanent planting / perennials and bushes – removing annuals (esp when flowering) is wasteful – instead reflect French roundabouts
- Native plants
- Would support al fresco dining spaces / pedestrianisation

- Information on the environmental and health benefits of each element of Green Infrastructure - may inspire others to recreate smaller versions outside their homes as well as increase the respect and appreciation for our town centre
- Ongoing maintenance of green infrastructure
- Solar panels

Do you think there are any opportunities/locations where new green infrastructure could be provided in Orpington Town Centre?

Various locations

- Replace parking with parklets
- Green roofs eg Singapore's on high rises and nature ways
- bus stops - where children queue on polluted roads – planting / Bee-friendly (eg Netherlands)
- Verges - Stop mowing (and spraying) and let wildflowers thrive
- roofs on the high street planting / solar panels
- Town center, rain gardens and green roofs
- Pavements
- Empty units

Specific locations

- Along the High St – green corridor / pedestrianise & dig planting spaces
- Priory gardens - wildlife garden/space with a beehive and educational information
- Tesco is crying out for a green wall.
- Tesco roof converted into a growing space for fruit and vegetables
- The north end of the High Street would benefit from more greenery.
- Library / cinema - space outside - more planting and some kind of water feature.
- Walnuts square & link to High St, more planting, trees (noted area 'ripped up' for cinema)
- The Walnuts leisure centre - green walls
- War memorial – more attention
- Orpington station - trees and green walls
- Sevenoaks Road / Crofton Road / Charterhouse Road - Wildflower meadow verges
- car parks - parts which are under used could be planted as wild flower gardens

Which, if any, open spaces in and around the town centre do you currently use, and why?

Priory gardens

- it's calming and makes me feel closer to nature despite the urban setting.
- beautiful and inspiring
- not very accessible from High st
- easy to access from R3 bus - stops outside
- children's play park is well equipped - in need of some TLC,
- duck pond is fun
- to walk dog
- Could do more wilding & native species / less formal planting to encourage insects and birds etc
- better use could be made of the wide open space - more events
- more buggy/scooter friendly paths required.
- Used More when the library was there

Public Realm Open Spaces

- when there are market stalls
- recent art works done by local children – more of this please
- high street for shopping and eating out
- Roads to and from Green st Green to Orpington. Charterhouse Road, Sevenoaks Road, Court Road.

Goddington Park - for leisure, relaxation and exercise.

Poverest/Covert Wood. -Wood is good to escape heat and see some wildlife

Jubilee Park,

High Elms

None

- I spend as little time as possible in the town centre.
- Motorised traffic has priority and pedestrians are second class citizens.
- current arrangements don't really encourage you to want to linger
- the high street is too noisy and dirty with the traffic. I used to spend more time at the priory gardens when the library was there. It was a lovely place to spend some time. I probably only spend time in the open spaces now. There were a great idea - more of that sort of thing please.

Are there any open spaces in and around the town centre you do not currently use, but would like to? What changes would make you more likely to use this open space?

- Market Square (between the Library , Sainsburys and Orpington College)
 - more green
 - incorporate water in some way.
- walnuts entrance
 - planters
 - area of wild flower
 - natural play area for young children?
- Priory gardens
 - improve access from High St
 - 'sort out' the geese – small child petrified / goose poop
 - lake water quality - full of rubbish and smelling of wee
 - hang out for street drinkers and weed smokers
 - priory building
 - revert to community amenity - was ideal for families to make a day of visiting the library / museum and provided public toilets
 - falling into ruin?
- cycle lane 'corridor' to link up green spaces
- bridge and foot path from Walnuts - not pram or wheelchair friendly - a mess and doesn't feel very safe.
- Southern end of high st foot paths
 - Improve – they are narrow and polluted

Do you have any other comments in relation to green infrastructure in Orpington Town Centre?

LBB should 'walk the walk'

- Opportunity for change
 - embrace this seriously, not just pay lip service to it.
 - Involve local school children
 - set up local community groups run by volunteers to save money who will take care of the green spaces.
 - Add a cafe at priory gardens - even if it's a pop up.
- Trees
 - established trees being lost
 - Saplings planted but with poor success rates.
 - Enlist public in tree planting / health monitoring

10 Environment and Air Quality

23 responses in total

What actions do you think could be taken in order to reduce carbon emissions?

Raise ambition - Bromley target of zero net Scope 1 emissions (i.e. the Council's own emissions) by 2029 admirable but represents only 1% of the Borough's total emissions. Bromley should, like other Boroughs, reset its target to include 100% of the Borough's carbon emissions.

Increasing Active Travel (Cycling & Walking)

- Improve facilities for people to walk, cycle
- more cycling routes to improve safety,
- more secure cycle storage next to shops, leisure centre and station;
- Hire bikes at the Station and in the High Street
- Need a bike shop
- more pedestrianised areas, safer crossings and wider pavements
- more outdoor public seating for people to rest

Cars & Buses

- Pedestrianisation of Orpington High Street except for disabled and elderly drop off and parking
- Remove on-street parking and prioritise bus-only access. (Car parks accessible from Gravel Pit Way)
- Better / free public transport
- address the phasing out of fossil fuel transport
 - Provide more EV charging points (including in all car parks)
 - Support electric car hire firm to establish off the High Street (eg Gravel Pit Way)
 - Electric buses
- Encourage car clubs (zip car) to area.
- Restrict delivery times for shops
- 20mph zone around town centre
- Enforce engine idling pavement parking & speeding laws (note Carlton Parade concerns)

Public Realm & facilities

- Plant more native trees, hedges and green walls for carbon capture and air quality (note - grass is less useful than planting / trees) as well as for mental wellbeing, natural shade & attractiveness

- Water bottle re-fill points
- more recycling bins and encouragement of streaming waste into the correct bins
- information
 - Measure particulates as well as CO2 and NOX.
 - good information about emissions & recycling
- independent shops
 - refill shops for dried food, home cleaning products & laundry liquids
 - repair shop/cafe
- lending library of things (for DIY & garden tools, partywear, electricals, musical instruments, kitchen gadgets).

New developments (inc Walnuts)

- to be carbon neutral
- Improve energy efficiency, renewable energy / sustainable heating methods (eg heat pumps / solar panels), green energy tariffs
- Generate energy for local business to buy

Retrofit Existing Development

- LBB should set up a pilot scheme to retrofit a housing development with improved energy efficiency measures, to roll out similar projects across the whole authority housing stock
 - to keep warm/cool, reduce energy use and carbon emissions (LBB to fund)
 - to allow Britain to meet the legal requirement of zero net carbon emissions by 2050.
- LBB to fund or secure grant funding

What actions do you think could be taken in order to deliver air quality improvements?

Increasing Active Travel (Cycling & Walking)

- Improve facilities for people to walk, cycle
- more cycling routes to improve safety,
- more secure cycle storage next to shops, leisure centre and station;
- Hire bikes at the Station and in the High Street
- Need a bike shop
- more pedestrianised areas, safer crossings and wider pavements
- more outdoor public seating for people to rest

Cars & Buses

- Pedestrianisation of Orpington High Street except for disabled and elderly drop off and parking
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Public Realm & facilities

- Plant more native trees, hedges and green walls for carbon capture and air quality (note - grass is less useful than planting / trees) as well as for mental wellbeing, natural shade & attractiveness

Reduce particulates

- Extend the London ULEZ
- More car free areas in Bromley, Safe Streets initiatives (esp around schools)
- car free days in town centre - maybe one day a week and on special occasions
- Reduce speed limits to lower emissions.
- Ban diesel cars
- Limited permit access during set hours for fossil fuel vehicles to school roads / high streets during set times (school drop-off / pick-up, rush hour,..).
- Higher parking fees for fossil fuel vehicles (or reduced fees for electric vehicles)
- Dedicating more parking places to electric vehicles, adding charging points. Making parking free while charging.
- Actively respond to live peaks in air pollution (restricting access of older vehicles / diesel vehicles & making public transport free in the Borough for that day...). – requires real-time air pollution monitors (see below)
- Ban / enforce ban re wood burning stoves and bonfires

Design

- Roof gardens on new housing developments
- Green walls on Tesco, the leisure centre (entrance & side facing the Walnuts), JTL, other concrete buildings
- More tree preservation orders & compensate loss of trees

Education and Information

- installation of a network, including Orpington High Street, of real-time, on-line accessible air quality monitors (including PM2.5)
- Education campaign re walking and cycling for personal health and carbon footprint;
- provide cycle training & fixing courses;
- Raise public awareness re harm wood burning stoves and bonfires to local lungs (esp during the pandemic).

Do you have any other comments in relation to the environment and air quality in and around Orpington Town Centre?

Transport & Highways

- Be brave and face up to the car lobby which is killing Orpington residents.
- active travel infrastructure, especially cycle lanes, joined up across the Borough as part of a network
- Discourage through traffic.
- Congestion between the Tesco entrance and the war memorial needs to be addressed.
- bring in speed control on all Orpington roads.

Air quality reporting

- Report compliance with WHO air quality guidelines to ensure a thriving future - attractive to potential residents

Planning

- Attach significant / great weight to projects which eliminate air pollution and carbon emissions.
- Approve only low and zero emissions replacement buildings

Public Realm

- shops and businesses encouraged to participate in planting and greening of premises
- landscape planting for pollinators, wildlife corners - e.g. rewilding some grass verges
- New developments on should be encouraged to plant trees along the boundary with the narrow pavement. Station Road
- Court Road and High Street - Emission absorbing trees or technology.
- measures to discourage the chewing gum on pavements

11 Development Opportunities

5 responses in total

What is special/unique about Orpington Town Centre?

Good public transport links & local catchment (within walking distance of many homes) and pedestrian friendly environments

High Street

- The War Memorial at one end, The Priory, and the Priory gardens at the other end
- mix of cafes, restaurants, entertainment, leisure and retail. older shop facades are original and could be restored more to character.
- Uniform height
- Period and mock Tudor buildings

The Walnuts

- not very inviting despite past refurb
- potential for vibrant al fresco space attractive to the college students and to families

Environment

- The Priory, and the Priory gardens – ‘lovely and special’
- The River Cray - underutilised as a feature

What aspects of the town centre do you think are integral to the character of the area?

- The Priory and the Priory gardens
- Leisure centre with swimming etc, library and other community spaces.
- Period buildings.
- Flowers in the High Street

Are there particular areas within the town centre that have a specific character that particularly warrants further guidance?

- The uniformity of height of buildings in the High Street should be preserved.

Further guidance on

- Broomhill Road environs,
- The Priory and area around the Parish Church.

Do you have any other comments in relation to development opportunities in Orpington Town Centre?

- Mixed-use developments could address vacancy as High Street is impacted online shopping and working from home.
- Reduce traffic, increase pedestrian areas / improve safety of cyclists and pedestrians,
- Additional trees and green spaces to enhance attractiveness and air quality
- Residential development to be affordable/ social / key worker, not expensive commuter flats
- Retain community facilities (concern at loss of police facilities)
- Restoration rather than replacement of older properties

Appendix 2: summary of written responses, by theme

Themes

1. General comments
2. The future of Orpington Town Centre
3. Housing
4. Transport infrastructure
5. Offices
6. Retail, culture and leisure
7. Public realm, permeability and connectivity
8. Historic environment
9. Green infrastructure
10. Environment and air pollution
11. Development opportunities

1 General comments

- SPD should
 - provide guidance for future developments for flexible and adaptable spaces that are resilient to changing circumstances.
 - respond to and support change from predominantly retail to residential and cultural (including larger scale developments)
 - masterplan to reduce carbon emissions with significant sustainable infrastructure & sustainable buildings
 - be based on a clear vision to ensure a prosperous and thriving future for our town centres.
 - step change in the nature of people movement infrastructure (re pandemic and climate change)
 - Promote active travel - move to walking and cycling including
 - repurposing of civic and highway spaces
 - & additional pedestrian routes to reduce traffic
 - Recognise the local spend / benefit to town centre of
 - increased residents
 - walkers / cyclists
 - involve sensible and practical use of brownfield sites.
 - give clarity over the scale and nature of redevelopment
 - have understanding of deliverability and viability considerations
 - Be an opportunity to enhance the character and local distinctiveness;
 - Involve landscape characterisation and townscape assessments.
 - Protect natural resources, including air quality, ground and surface water and soils and use natural resources more sustainably;
- Take note of
 - the London Plan,
 - the Local Plan
 - the Local Implementation Plan for transport (LIP3)
 - the AQAP
 - Carbon Management Strategy,
 - Habitats Regulations

- recent DFT Guidance of May 9th 2020, manifesto 'Gear Change';
- maintain consultation as SPD develops
- Concern that proposed changes to planning amount to a "developer's charter"

2 The future of Orpington Town Centre

- Flexibility
 - more mixed-use retail, cultural and leisure areas to be the core function of town centres to ensure that they can adapt and thrive
 - Likely shift to internet shopping at expense of town centres
 - key to creating functional and enjoyable civic spaces
 - potential desire for shared work space - benefits of both wfh and serviced offices without the London commute
- variety / vibrancy
 - a range of commercial uses at typically, but not limited to, ground floor with residential accommodation above and including new community uses and public realm improvements
 - residential development - vibrancy (day and night) & footfall.
- Placemaking
 - 20 minute neighbourhood model for places - broad mixture of land uses for existing catchment
 - Prioritise community spaces and activities (inc in empty units)
 - importance of outdoor settings – for health & socialising
 - public realm enhancements - green infrastructure, key to town's reputation - outdoor dining, market stalls
 - green infrastructure – protect, increase, enhance access for multiple benefits
 - equality, accessibility, safety for all (ref elderly and disabled) to buildings, parks, public realm
 - high-quality living - quality buildings and public spaces
 - renewal of other parts (not walnuts) of the town centre develop quarters or zones visually along the high street- with diversity of retail, commercial and community spaces.
 - Identify for Tall buildings round Market Square.
 - higher density of development,
 - low rise and of human scale - avoid high rise wind tunnels without character
- Movement
 - enhance and increase pedestrianisation (full High St)
 - Safe walking / Cycling - increase opportunities.
 - improvements made to public transport.
 - Better permeability / quality access points for active travellers across major highway barriers

3 Housing

- Local Plan indicates limited housing development
 - Bruce Grove (Site 9) within the Town Centre
 - Homefield Rise (Site 11) to the south.
- SPD should increase housing density within town centre envelope with design guidance identifying potential sites for improvement or redevelopment
- Walnuts redevelopment providing residential

- opportunity for different housing typologies one and two bedroom units - attractive to young people - need indicated by Carter Jonas, (for LSEC)
- potential to significantly contribute to the Borough's housing targets,
- reducing pressure on Green Belt and Metropolitan Open Land
- assist in promoting sustainable transport and reduce the reliance on private vehicles,
- increase footfall supporting local businesses.
- Require / exceed space standards to create high quality accommodation.
- New homes should be affordable, and a place to live, not an investment.
- Buy to let should be disincentivised

4 Transport and infrastructure

- holistic transition to active travel and public transport– for multiple health environment economic benefits
 - Adopt Healthy Streets principles.
 - hierarchy of modes of people movement to prioritise most vulnerable users first.
 - Create space for safe active travel - high-quality public realm for walking and cycling – notably routes to the Station
 - improve and increase pedestrian crossings (encouraging walking) - Increased pedestrianised areas, but with some parking and drop off points for disabled and elderly
 - Complete (or partial) pedestrianisation (with some essential drop off points and disabled parking)
 - Support strategic cycle routes to serve the area - including priority measures on approach roads
 - Secure, accessible and CCTV-monitored bike storage space throughout town centre
 - E-bike hire scheme (docks in High St & station).
 - Local Deliveries by eCargo Bike
 - prepare for increased numbers of electric scooters
 - Council-led active travel promotion to support Bromley's Green recovery
 - expansion in bus infrastructure
 - for disabled travellers
 - esp to station
 - shuttle-style services
 - divert buses through Homefield Rise and Gravel Pit Way.
 - Orp station susceptible to railheading
 - Urban centres to be car free / Restrict to EV
 - London Plan (ItPLP) standards for car and cycle parking
 - New residential development to be car free
 - strategy for consolidating car parking over time to reallocate space away from cars
 - Restrict car parking / differential parking charges (EV spaces with charging)
 - Consolidation of deliveries and servicing to town centre - to avoid peak traffic times (BID). (co-ordinated through the BID)
 - 20mph zones in all town centre
 - Anti-idling controls
- sustainable drainage for new highway / footpaths / public realm
- Lobby for ULEZ expansion - ideally the whole borough
- repurpose existing parking for open space, public realm, residential
- green public transport expensive - set infrastructure priorities and allocation of CIL.

- Highways England no comment at this time (highlight advice notes ‘ Streets for All’ 2018)

5 Offices

- Delay the building of new offices until the long-term impact of the Covid-19 crisis on office use is fully understood
- new offices should be multi-use / flexible
- No more office block to residential rabbit hutches

6 Retail, culture and leisure

- Diversification to respond to the changes in the retail environment / complimentary range of uses
 - stronger focus on cultural and leisure facilities strengthen existing
 - support further small and independent operators,
 - meanwhile (temporary uses important during re development) uses
 - markets.
 - Support expansion of night time economy
 - Flexible space to enable community groups and organisations to hire at a low cost
- Developments should deliver / support new spaces for socialising
- Walnuts / Orpington College & Public Realm
 - Increasing the number of residents within Orpington will provide the demand for additional and a wider variety of eateries.
 - strengthen existing cultural and leisure facilities through redevelopment of the Walnuts - a higher quality shopping space / leisure complex
 - expand activities targeted at young adults.
 - civic / community hub with indoor event facilities integrated with library or redeveloped leisure centre.
 - Shopping centre to encompass green initiatives - using renewable energy / shops reducing plastic etc.
 - Awnings over shops - simple devices improved the experience for shoppers in town centres (important re COVID).
 - Identify Orpington College for redevelopment (education and residential)
 - Enable events, markets, mothers with prams, play areas for children, dog free areas, spill out areas
- Regular market, improving social interaction and sense of community
- Complete or partial pedestrianisation of the High Street with parking/drop off allowed for people with particular needs such as the disabled and elderly.
- Increase trees and hedging (shade, mental health, carbon capture and air cleaning)
- Support walk/cycle to increase footfall & local spend
- Increase activity - Sport England's Active Design Guidance includes 10 Active Design Principles <http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

7 Public Realm, Permeability and Connectivity

- SPD should acknowledge the importance of the public realm which
 - adds significant value and distinctiveness - particularly following changes to the retail environment.
 - plays a vital role in keeping us active - Good design should create environments that make the active choice the easy choice for people and communities.

- Public realm should be
 - inclusively designed
 - improve permeability across the town centre.
 - a strengthened link between Orpington Town Centre and the railway station - important for visitors from beyond the local area.
 - support sustainable transport modes
 - Support health through promoting activity
 - attractive, interconnecting public spaces - including for young people
 - support improved connectivity / permeability
 - location to socialise outside
- Public Realm Improvements
 - Create more space to sit and meet.
 - include trees a species capable of growth to exceed building height and managed so to do
 - remove barriers eg steps and steep inclines
 - Security - clean and well lit (renewable energy street lighting) routes to the town centre prioritising pedestrians and cyclists.
 - more outdoor sheltered spaces to allow for more comfortable outdoor activity during autumn and winter
 - Sufficient space (internal/external) in lobbies, corridors, lifts, forecourts, gardens to facilitate social distancing
 - Reduce unnecessary street clutter.
 - Ensure step free access to ALL premises in the town centre (temp ramps where required)
 - Install water bottle re-fill points and more recycling stations.
 - Secure storage for bikes near the shops, stations, leisure centre.
 - Increase electric car charging points.
- Specific Location / Route Improvements
 - Hight St Pedestrianisation
 - increased pedestrianised within the town centre.
 - modal shift - make cycling, waling, public transport preferable to drive
 - Orpington by-pass provides a suitable alternative route for cars, Divert through traffic away from High Street onto Spur Road; restricting traffic entering High Street by War Memorial to buses and cycles, and route cars to car park via Gravel Pit Way
 - OR Equidistant crossings on High Street. Pedestrian priority at side road junctions
 - Review crossings around War Memorial and integrate parallel crossings to connect cycle network
 - Market Square
 - promote role as community hub, public space, for community activity, congregation and engagement
 - surrounding developments should support / enhance its role
 - Routes
 - Cray Valley - connect along valley floor through the town centre core, extending the Cray Riverway and historic Priory Gardens with linear open spaces and pocket parks to link with planned Green Street Greenway to High Elms Country Park.
 - Priory Gardens to new development
 - Green / public spaces to neighbouring estates

- Ped route High Street to station via Knoll Rise (avoiding traffic dominated Station Road).
- New developments should
 - improve links to existing parks and green spaces.
 - create a more walking and cycling friendly environment.
 - promote Market Sq if neighbouring

8 Historic Environment

- SPD should
 - acknowledge benefits, including economic and cultural of the historic environment inc The Priory Conservation Area & Listed Priory
 - Recognise Archaeological Priority Areas / consider archaeological assessment and review
 - Reflect the timeline and rediscover a sense of place - past, present and future - legacy of market gardening, hop growing, plant nurseries
 - protect the historic environment and identify how new development can be accommodated without causing undue significant harm.
- Historic Environment should inform the context of development.
- High density development, of high quality design, is
 - appropriate within the town centre which is sustainably located
 - key to meeting housing targets through greater density opportunities.
- Need to manage potential tall buildings in relation to heritage assets and their setting
- history of the town should be reflected in developments of historical assets but not inhibit development of sites not affecting the historic environment. (eg Walnuts / College)
- Refurbishing of 60s and 70s development would make the high street more attractive
- Attention drawn to HE documents
 - re Tall buildings - Advice Note No 4: Tall Buildings <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4> currently being revised - <https://historicengland.org.uk/whats-new/news/tall-buildings-advice-consultation/>
 - re managing new development and securing good growth for the historic environment - The Setting of Heritage Assets (Good Practice in Planning Advice Note 3) <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
 - re public realm improvements - Streets for All; Advice for Highway and Public Realm Works in Historic Places (2018) <https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/>

9 Green Infrastructure

- Commitment to the protection of the Green Belt
 - areas of green belt must not be arbitrarily redesignated
 - development must focus on brownfield sites.
- Green spaces support
 - mental health,
 - physical fitness
 - general well being
 - public health
 - coherent and resilient ecological networks, for nature and wildlife, (even small areas allowing species to move).

- manage environmental risks eg flooding and heat waves
- cleaner air
- carbon capture
- Protect & increase existing parks and green spaces
- Increase areas managed for biodiversity and allow some areas to develop naturally
- Encourage strong links in new developments to local green spaces
- Green areas must not be lost
- Green infrastructure
 - Reputationally important to Orpington TC .
 - Vital to ensure that the UK meets its Net-Zero targets by 2050.
 - increasingly popular among young adults (that new res dev may attract).
 - Visually attractive supporting local pride and town centre vitality
 - Is both cost and benefit – funding opportunities (Mayor’s Greener City Fund eg Incredible Edible and Edible Bustop)
- Require provision for Green Infrastructure (GI) within all new development and seek opportunities to retrofit green infrastructure / enhance biodiversity in and around town centre.
 - green roof systems / roof gardens;
 - green walls to provide insulation or shading and cooling;
 - pocket parks
 - new tree / hedge planting to support birds and pollinators, air quality, urban cooling, shade and carbon capture.
 - Replacement trees to provide equal or greater canopy size.
 - management of land to benefit local biodiversity
 - perennial wildflowers and native plants in preference to formal seasonal bed planting /disposal
 - rewilding (with clear signage)
 - natural verges
 - incorporating features for wildlife eg bat roost / bird box / swift bricks
 - Install timer triggered irrigation for planting to reduce plant, tree and water wastage
 - Install water bottle filling sites

10 Environment and Air Pollution

- Reduce traffic
 - Reduce car parking on Orpington High Street
 - High St pedestrianisation & more pedestrian routes to reduce travel within the town centre.
- War Memorial roundabout too polluted and dangerous (note school students, cross there every day)
- New developments / major refurbishments
 - be carbon neutral as a minimum or better still carbon negative
 - utilise sustainable technologies and greener construction methods / building materials
 - high energy efficient standards and renewable energy / heating systems / solar panels
 - ground source heat pumps for central community-wide infrastructure and CHP (Combined heat and power)
 - electric vehicle charging points and cycle storage
- invest in more energy efficient busses.
- Consider adopting sustainable and air quality measures as in other UK towns / cities and towns have taken.

- Promote / require sustainable urban drainage schemes.
- Shopping centres and other businesses to be energy efficient and use green energy tariffs.
- Air quality monitoring stations with publicly visible electronic displays in visible key transport activity locations providing live data to the public
- Restrict
 - hours for bonfires to after 8pm in the winter & after 9pm in the summer.
 - limit or ban the use of polluting rotary mowers as blowers recirculate particulate matter (diesel exhaust, tyre and road wear, brake wear, bonfires, log burners etc) raising ambient pollution levels.

11 Development Opportunities


- Walnuts redevelopment
 - acknowledges location within the Cray Valley renewal area
 - potential for delivery of significant amount of new homes, new jobs, new social infrastructure and improved public realm.
 - Need for high quality design, in keeping with the surrounding character
 - Consider good place making at the heart of successful town centre.
 - Support consultation with the local community.
- Orpington College Campus and adjoining car park
 - opportunity to deliver new residential, education & commercial development
 - landmark tall building to identify Market Square - currently lacks visibility.
 - Space within the Town Centre should be flexible and adaptable

Appendix 3: Summary of Commonplace map responses received

22 responses received (👍 symbol denotes the number of people who agreed with the comments)

The Priory & Priory Gardens	👍
Priory could become a real hub for the community. There is space for Artisans and Eco friendly shopping; a community cafe; displays/information on environmental; sustainable and ethically friendly living; courses/classes ie health, yoga, recycling, upcycling, gardening etc	11
Priory Gardens need a café to make it attractive & Orpington needs places to do courses, yoga, adult education, concerts etc.	2
High Street, Walnuts Shopping Centre	👍
Pedestrianise the High Street to make shopping more pleasant and enable restaurants to grow. Re route buses to the rear	1
One way system in the High Street / pedestrianise (weekends only) - environmentally friendly & allow for better social distancing to support return to high street shopping.	2
Pedestrianise & facilitate outdoor dining without car fumes. Orpington by-pass on Court Road already in place & existing bus stops on Homefield Rise cater for those travelling into Orpington Town Centre. There is ample parking accessible via Gravel Pit Way This will rejuvenate the town centre, improve air quality, reduce pollution, and create a town fit for the 21st century	11
Restrict non bus traffic between certain hours & make it more cycle friendly	1
Pedestrianise the High Street, or restrict to buses, taxis and cyclists. No car parking along the High Street to increase pedestrian safety - drivers to park elsewhere eg Tesco or Sainsbury car parks, which should have EV chargers. Concern about High Street & roads behind / fringe area (flytipping, littering and antisocial behaviour)	2
Pedestrianisation to support those with mobility problems & cyclists. Investment (as in Bromley Town Centre) Note successes elsewhere – markets (Farmers, Flowers, Craft, Eco), Pop -ups etc , - Engaging business & residents to create a sustainable and environmentally aware / friendly centre & 'community' feel for their environment	4
Measures for vehicles introduced a few years ago, don't work – on approach to the War Memorial roundabout traffic is slowed by narrowed High Street leading to dangerous crossing between cars – suggest widen road or encourage vehicles to use Gravel Pit Way / a mini roundabout on A232/ Gravel Pit Way	4
Currently unconnected- two ends to the High Street with the Walnuts in the middle. Suggest free shuttle bus connecting one end to the other / more / better distributed free car and bike parking Restaurants and cinema are great but needs more retail variety	2
Bring back a few limited time free parking places	0

The Walnuts is a very dated - very little to encourage 'mooching' - soulless with bland shops -. Removing cars and buses is key to opening the space up - enabling something like Brixton market, Brixton pop or Croydon/Shoreditch boxpark - more local / independents needed - good coffee shops, children's play, family friendly exercise space / space for events/displays.	8
Orpington is a nice place, but it needs more offering to create a better living for the community - current retail / market stall offer is of very low quality. A a food quarter like Boxpark in Croydon would be a 'phenomenal attraction' .	1
Update the High Street - create festivals, fetes carnivals & fun days bringing people together - old and young	1
More public art - murals, sculptures etc. Better (sheltered) seating. More events like the food festival, Christmas market etc – affordable things to see and do in town	4
Need to re define the High Street. Learn from others eg Hackney Shoreditch -very cheap rents / support for start ups, artists etc to develop the cultural buzz	4
convert cheap temporary shops into housing, & pedestrianise the high street. Events - markets & festivals / eco shops – attractions people will make the effort to travel to	2
Attract some quality retailers back – 'Bring back our High Street!'	0
Lack of shopping facilities all fast food and cafes and charity shops	4
Lack of toilet and/or café facilities in the vicinity of Priory Gardens (and in the park itself) and lack of seating. Over-provision of take-aways. Lack of daytime uses	6

The Walnuts Leisure Centre	
The entrance to the Walnuts leisure centre is not inclusive or prominent. Car & bike via Lych Gate Road / pedestrian access from the shopping precinct involves step access to the side of the building	3

Appendix 4: example of ‘Nuts to the Walnuts’ standard questionnaire template

NUTS TO THE WALNUTS

June 2022

Email: ldf@bromley.gov.uk

Head of Planning Policy and Strategy
 Civic Centre
 Stockwell Close
 Bromley, BR1 3UH

Dear Sir or Madam

Here is my response to the Consultation on Orpington’s Draft Supplementary Planning Document, 2022.

I would like Orpington to have

Also, I feel strongly that (tick as many as are important to you)

no buildings should be taller than Brunswick House (9 storeys)	<input type="checkbox"/>
the existing Leisure Centre should be updated, or a new one built before it is demolished	<input type="checkbox"/>
we should make sure we have enough GP surgeries and hospitals for new residents	<input type="checkbox"/>
we should make sure we have enough schools for new residents	<input type="checkbox"/>
we should make sure public transport connects all areas well to the town and that it is fully accessible for disabled people	<input type="checkbox"/>
we have more parking spaces for visitors to the town	<input type="checkbox"/>
we keep the functioning shops that we have now	<input type="checkbox"/>
we should keep the character of our small Kent town	<input type="checkbox"/>

Yours faithfully

Signature:Name in capitals:

Address (number optional):

Post code:



Orpington Town Centre Supplementary Planning Document

Strategic Environmental Assessment Screening
Statement – December 2021 (with post-
consultation update June 2023)

1. Purpose of Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

- 1.1. This Strategic Environmental Assessment (SEA) screening is being prepared in accordance with the requirements of European Directive 2001/42/EC (“the Directive”); and the Environmental Assessment of Plans and Programmes Regulations 2004 (“the Regulations”). The following guidance has also been taken into account:
- The National Planning Policy Framework (NPPF) (July 2021)¹.
 - The National Planning Practice Guidance (PPG) in relation to SEA/SA².
 - A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005)³.
- 1.2. Sustainability Appraisal (SA) is the process by which the Directive is applied to Local Plan documents. An SA is required under the Planning and Compulsory Purchase Act 2004 for all Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Directive also requires a SEA to be carried out on certain types of plans with significant environmental effects.
- 1.3. Both SA and SEA processes are undertaken during the preparation of a plan or strategy to aid the implementation of sustainable development. The main difference between them is that while an SEA has more of an environmental focus, the SA should focus on social, economic and environmental issues.
- 1.4. Although SA and SEA are distinct requirements, government guidance has recommended a single appraisal process. The SA process for planning documents translates the requirements of the Directive, and Government guidance on undertaking SAs has been prepared so as to incorporate the requirements of the SEA Directive.
- 1.5. Bromley’s Development Plan consists of the Bromley Local Plan and the London Plan. The Bromley Local Plan and the London Plan have both been subject to a SA/SEA
- 1.6. The PPG⁴ states that:

“Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.

A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see

¹ Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² Available from: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

³ Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

⁴ Paragraph: 008 Reference ID: 11-008-20140306, available from:

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.”

2. Orpington Town Centre SPD

- 2.1. The Orpington Town Centre SPD provides guidance on the interpretation of adopted planning policies as they relate to the Orpington Town Centre area.
- 2.2. The SPD sets out a number of design principles derived from existing Development Plan policies and national policy:
 - Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 2.3. These design principles are considered essential components in delivering good quality design, and which are widely documented as being among the key characteristics of successful well-designed places:
- 2.4. The SPD divides the Orpington area into a series of character areas, which have been derived through consideration of the context of the wider area and represent those parts of the area which are considered to have similar characteristics. Guidance is provided for each character area, derived from existing planning policies, including guidance on existing site allocations and some further potential development opportunities. General guidance is also provided which applies across all character areas, covering topics such as heritage and conservation, green infrastructure and biodiversity and sustainability.

3. The Screening Process

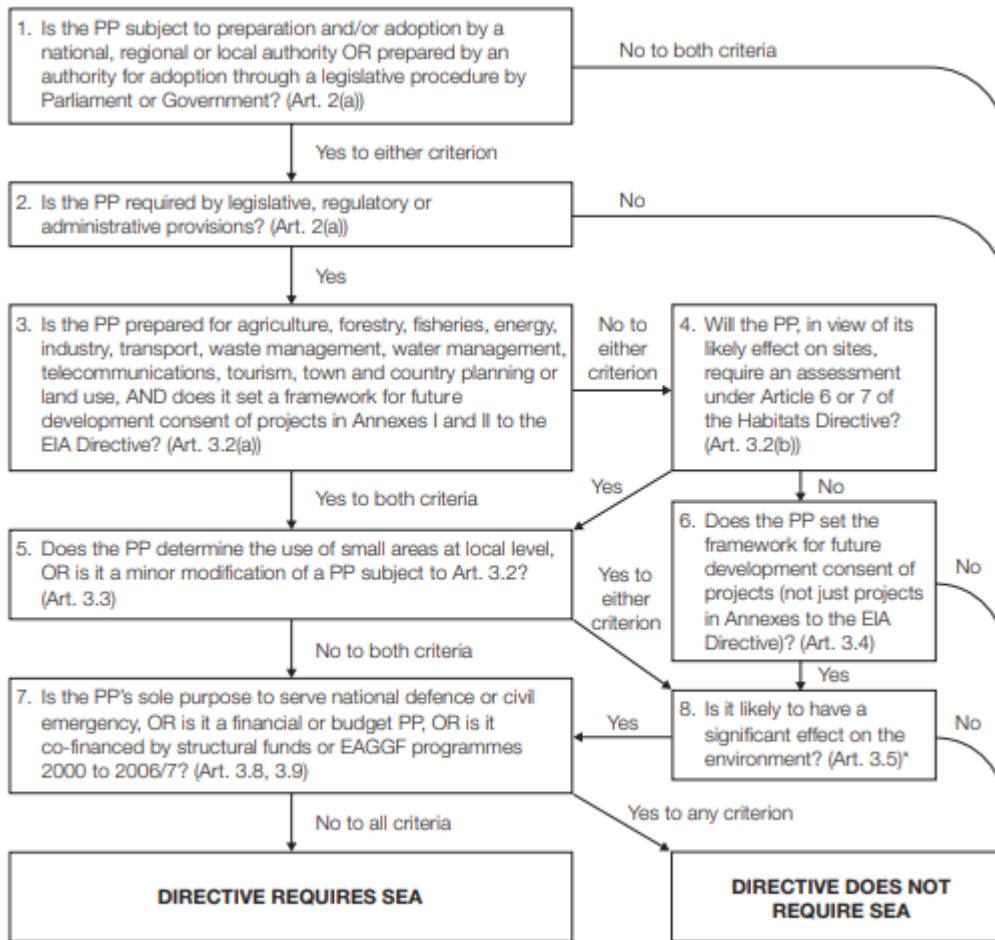
- 3.1. Though not part of the statutory Development Plan, SPDs can cover a range of issues, which generally interpret policies in the Development Plan. If an SPD is considered unlikely to have significant environmental effects through the screening process, then the conclusion will be that the SEA is not necessary.
- 3.2. To assess whether an SEA is required the Responsible Authority (Bromley Council) must undertake a screening process based on a standard set of criteria. Where the Responsible Authority determines that the plan or programme is unlikely to have significant environmental effects, and therefore does not need to be subject to full SEA, it must prepare a statement showing the reasons for this determination.
- 3.3. This must be subject to consultation with Historic England, the Environment Agency and Natural England. Following consultation, the results of the screening process must be detailed in a Screening Statement, which is required to be made available to the public. The three consultation bodies were consulted during the preparation of this SEA screening statement, ahead of the draft SPD consultation; details of their responses are provided at Appendix 1. Responses to this initial consultation were received from the Environment Agency and Natural England; both these consultation bodies agreed with the Council that an SEA would not be required for the proposed SPD.
- 3.4. The Council consulted on the SEA screening statement as part of the draft SPD consultation. The three consultation bodies were specifically consulted as part of this consultation exercise, their responses are set out at Appendix 2, alongside a response from a local resident in relation to the SEA screening statement. Historic

England considered that, given the potential for significant effects on the historic environment through the allocation of the site and the proposed design parameters, we would suggest that the draft SPD should in fact be subject to a SEA.

- 3.5. Following the consultation on the draft SPD and the representations made, the Council has reviewed this SEA screening statement, to ascertain whether any changes are necessary in light of representations received.
- 3.6. Key to the screening decision is the determination of whether the SPD is likely to have significant environmental effects. To assess this, the Council has taken a two-step approach:
 - First, to assess the plan against the guidance set out in 'A Practical Guide to the Strategic Environmental Assessment Directive'⁵. The guidance sets out a flow chart to guide application of the Directive to plans and programmes (shown in Figure 1); the screening questions from the guidance are set out in Table 1, alongside the Council's response in relation to the Orpington Town Centre SPD.
 - Second, using the criteria set out in Schedule 1 of the Regulations to determine whether the SPD will have significant environmental effects. These criteria are set out in Table 2, alongside the Council's response in relation to the Orpington Town Centre SPD.

⁵ Ibid

Figure 1: flow chart to assist with the application of the SEA Directive to plans and programmes



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

4. Screening assessment

Table 1: assessment against criteria in A Practical Guide to the Strategic Environmental Assessment Directive

	Screening Question	Screening Assessment
1	Is the SPD subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority through legislative procedure by Parliament or Government?	Yes. The SPD will be prepared and adopted by the London Borough of Bromley in its role as Local Planning Authority.
2	Is the SPD required by legislative, regulatory or administrative provisions?	No. The preparation of a SPD is optional. However, once adopted by the London Borough of Bromley, it will be a material consideration in the determination of planning applications.
3	Is the SPD prepared for agricultural, forestry, fisheries, energy, industry, transport or waste management, telecommunications, tourism, town and country planning or land-use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?	<p>Yes. The SPD will not create new policy or land use designations, but it will provide further guidance to support the Local Plan and London Plan, which is the town planning policy framework for its area and includes policies for land-use. However, the Local Plan and London Plan has been subject to full SA (including SEA).</p> <p>The SPD does set out character areas within Orpington Town Centre, but these are not land use designations; they are broad areas which share similar characteristics, which have been identified for the purposes of providing further guidance in relation to land use and design.</p>
4	Will the SPD, in view of its likely effects on sites, require an assessment under Article 6 or 7 of the Habitats Directive?	No. The Local Plan and London Plan were subject to screening for the need for assessment under the requirements of the Habitats Directive and it was concluded that such assessment was unnecessary. As the SPD will not change or add to policy, proposals or designations within the Core Strategy it is not considered that further screening for such assessment is necessary as there would be no likely effects on European Sites.
5	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2?	No. The SPD will complement the policies that have already been set within the Local Plan and London Plan. No aspects of the SPD will modify existing adopted policies nor seek to change existing site allocations, nor add new ones. The SPD will provide guidance on interpreting a number of Development Plan policies in relation to Orpington Town Centre, particularly land use and design guidance. This includes guidance for development opportunities on unallocated sites, but these will not constitute site allocations – they will apply relevant Development Plan policy to these sites to guide potential development.
6	Does the SPD set the framework for future	No. This framework is already set within the Development Plan. The SPD will provide further

	Screening Question	Screening Assessment
	development consent of projects (not just projects in Annexes to the EIA Directive)?	guidance on the implementation of these policies.
7	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000-2006/7?	No. The SPD does not fall into any of the criteria listed.
8	Is it likely to have a significant effect on the environment?	It is not likely that the SPD will have any significant effect on the environment, beyond those effects that have already been assessed through the SA (including SEA) of the Local Plan and London Plan.

Table 2: assessment against SEA Directive criteria

SEA Directive Criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	London Borough of Bromley Response
1. Characteristics of the Orpington Town Centre SPD having particular regard to:	
The degree to which the SPD sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The SPD will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough (and which were both subject to an SA/SEA)
The degree to which the SPD influences other plans and programmes including those in a hierarchy.	The SPD is a non-statutory document, subsidiary to policies in the adopted Local Plan and London Plan, and therefore will have limited (if any) influence over other plans and programmes, including national policy in the NPPF.
The relevance of the SPD for the integration of environmental considerations in particular with a view to promoting sustainable development.	The SPD provides guidance on environmental issues, derived from policies in the adopted Development Plan, including open space and green infrastructure, transport, and energy infrastructure.
Environmental problems relevant to the SPD.	The SPD will provide further guidance on environmental Development Plan policies, with reference to Orpington Town Centre.
The relevance of the SPD for the implementation of community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD will not impact on the implementation of community legislation on the environment.
2. Characteristics of the effects and of the area likely to be affected, having particular regard to:	
The probability, duration, frequency and reversibility of the effects.	The overall impact of the SPD will be positive, by ensuring that development in Orpington Town Centre addresses key policy requirements and delivers sustainable development.
The cumulative nature of the effects of the SPD.	Cumulative effects have been assessed through the Local Plan and London Plan SA/SEAs. The SPD is unlikely to have specific cumulative effects which differ from those assessed as part of the Local Plan and London Plan; the effect of the SPD will therefore be neutral.
The trans-boundary nature of the effects of the SPD.	The SPD will apply to developments in and around Orpington Town Centre, and will therefore have limited, if any, transboundary impacts.
The risks to human health or the environment (e.g. due to accidents)	No significant risks to human health are envisaged through the application of this SPD.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) by the SPD.	The likely minor positive effects of the SPD will be localised to the Orpington Town Centre area, through the interpretation of relevant adopted policies.
The value and vulnerability of the area likely to be affected by the SPD	The SPD will be consistent with the Development Plan approach that seeks to conserve and enhance

SEA Directive Criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	London Borough of Bromley Response
<p>due to:</p> <ul style="list-style-type: none"> i. Special natural characteristics or cultural heritage; ii. Exceeded environmental quality standards or limit values; or iii. Intensive land use. 	<p>the borough's heritage assets in a manner appropriate to their significance. This includes the Orpington Priory Conservation Area.</p> <p>Orpington Town Centre includes a SINC designation at Priory Gardens. The Development Plan has policies which protect SINC's; the SPD will assist with the implementation of these policies.</p> <p>Orpington Town Centre is within an Air Quality Management Area. The SPD provides guidance on how air quality policy requirements will be delivered.</p> <p>The SPD will interpret the policies within the adopted Development Plan to set out appropriate land uses for the Orpington Town Centre area. The SPD will not result in a significantly more intensive land use than that expected via application of the adopted Development Plan policies.</p> <p>The overall likely effect of the SPD will be positive by securing the positive environmental effects of development and minimising or avoiding negative impacts.</p>
<p>The effects of the SPD on areas or landscapes which have recognised national, community or international protection status.</p>	<p>There are no areas or landscapes in or around Orpington Town Centre which have recognised national, community or international protection status.</p>

5. Statement of Reasons for Determination

- 5.1. The Council believes that the impact of the SPD, through responses to the Criteria identified in Tables 1 and 2, will not have significant environmental effects (positive or negative) on Bromley, further to the effects that have already been assessed during the preparation of the Local Plan and the London Plan. In addition, the SPD is not setting new policy; it is supplementing and providing further guidance on existing policies. Therefore, it is considered that an SEA will not be required for the Orpington Town Centre SPD.
- 5.2. As noted in paragraph 3.5, the Council has reviewed this screening statement following the consultation on the draft SPD. We consider that the responses to the SEA criteria set out in tables 1 and 2 remain appropriate, and these responses have remained unchanged from the initial draft SEA screening statement.
- 5.3. Appendix 2 sets out the Council's response to the specific consultation responses received during the consultation on the draft SPD.

Appendix 1: responses to draft SEA screening statement from Historic England, the Environment Agency and Natural England, received as part of SEA screening consultation prior to consultation on draft SPD

Consultee	Response	LBB comment
Environment Agency	<p>The SPDs are unlikely to have significant environmental effects, and therefore a full Strategic Environmental Assessment is not required.</p> <p>We have no more comments to make.</p>	Noted.
Historic England	No response received prior to consultation on the draft SPD.	N/A
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on this consultation, however we do not feel an SEA will be necessary for this supplementary planning document.</p>	Noted

Appendix 2: responses to draft SPD that relate to SEA

Consultee	Response	LBB comment
Environment Agency	No comment on SEA as part of consultation response.	N/A
Historic England	<p>We have concerns that the development opportunities outlined in section 6 (Orpington East sub-area) are not based on an appropriate evidence base and that potential effects on the historic environment have not been properly assessed, understood or avoided. In particular, we consider the identification of the Walnuts shopping centre as a suitable site for what would be in local terms a very tall building to be premature at this stage.</p> <p>The draft SPD is in effect allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings. We consider that the effects on designated heritage assets in close proximity need to be understood before any decision on the suitability of such development is made.</p> <p>We further note the indication at para 1.3 that the preparation of the draft SPD for the town centre will inform the local plan review process. Should the allocation of the Walnuts shopping centre site and the design parameters at para 6.4 be confirmed in the SPD and carried forward to the emerging local plan, we would be concerned that it would not be possible for the Plan to be in conformity with national and regional planning policy as it relates to the historic environment.</p> <p>It would appear to us that in relation to the Walnuts site, the draft SPD is in effect creating new policy beyond that set out</p>	<p>Disagree - officers fundamentally disagree with Historic England about the need for an SEA. The comments are based on a misunderstanding of the role of the document. The guidance provided in the document relating to 'Development Opportunities' is not a site allocation – it is broad guidance which notes potentially suitable development height (based on officer judgement), and it defers to the need for detailed justification to address relevant policy requirements. This would include London Plan policy D9 which has specific consideration of heritage impacts. For the avoidance of doubt, the SPD has been amended to provide further clarity about the 'Development Opportunities'.</p> <p>Regarding Historic England's view that the SPD is in effect creating new policy beyond that set out in the adopted Local Plan, it is noted that Policy 1 of the Local Plan identifies Orpington Town Centre as a broad location where additional large housing sites may come forward. The housing trajectory at Appendix 10.1 of the Local Plan attributes 125 units from this source of supply, although this quantum is not the result of detailed modelling and is not a cap, hence it does not preclude delivery of a greater quantum of housing. Other sources of supply from 'Broad Locations' set out in the Local Plan housing trajectory – changing retail patterns and Public Land Reorganisation – envisage delivery of almost 600 units and could in principle relate to Orpington Town Centre.</p>

Consultee	Response	LBB comment
	<p>in the adopted Local Plan. While this is potentially problematic in itself, the absence of evidence and assessment of potential effects also fails to reflect the requirements of NPPF paras 31 and 190.</p> <p>Given the potential for significant effects on the historic environment through the allocation of the site and the proposed design parameters, we would suggest that the draft SPD should in fact be subject to a Strategic Environmental Assessment (SEA). This would enable proper understanding of the effects on heritage significance and help inform the design parameters in such a way as to avoid and/or mitigate them.</p> <p>Historic England has produced a range of good practice and advice notes on issues that are of relevance with regard to the draft SPD and which we would commend to you in its preparation.</p> <p>...</p> <p>Our principal concern with the contents of the SPD however relate to the proposed density and heights of development on the site of the Walnuts shopping centre. This site has come forward independently of the local plan process, and would appear to date to have not been subject to any assessment of the potential environmental effects the type of development suggested. The site is in close proximity to a number of designated heritage assets, including two highly graded listed buildings, the Orpington Priory conservation area and Priory Gardens registered park and garden. Together these assets help form the village-like character of the area to the north of the High Street. We consider there is potential for adverse impacts on this character and the individual significance of assets if as proposed the site is allocated with a taller building of up to 15 storeys.</p>	

Consultee	Response	LBB comment
	<p>Given the likely significant effects, we consider that the site (and therefore draft SPD) should be subject to SEA to assess and understand the impacts. This assessment should then be used to inform the site allocation design parameters and avoid (or at the very least mitigate) effects on the significance of individual heritage assets and wider historic character. It will also allow for better understanding of how such proposals relate to relevant planning policy in national, London-wide and local terms.</p> <p>This approach would represent a plan-led approach to tall buildings and sustainable development as required by the NPPF (para 15) and London Plan policy D9. It would ensure that the development process would proactively look to conserve and enhance the historic environment. As currently set out, there is a risk that the establishing the principle of a 15 storey tower on the site will mean that effects on nearby heritage assets have to be managed rather than integrated into the process much earlier. Further detail on this approach can be found in Historic England's advice note on Tall Buildings referred to earlier.</p> <p>As indicated above, we acknowledge the development potential of the site in question. However, we consider that the draft SPD is premature in proposing development of the density and height in question without robust evidence to support it or understand the level of impacts likely to occur. Detailed analysis is required to inform the design parameters before a decision on whether such development is appropriate for the site.</p>	
Natural England	In principle SPDs should not be subject to the Strategic Environmental Assessment Directive or the Habitats Directive because they do not normally introduce new policies or	Noted. The Council considers that an SEA is not required.

Consultee	Response	LBB comment
	<p>proposals or modify planning documents which have already been subject to a Sustainability Appraisal or Habitats Regulations Assessment. However a SPD may occasionally be found likely to give rise to significant effects which have not been formally assessed in the context of a higher level planning document. This may happen, for example, where the relevant high level planning document contains saved policies within a saved local plan which predates the need to carry out a SA or HRA and therefore no higher tier assessment has taken place. If there is any doubt on the need to carry out a SA or HRA a screening assessment should be carried out.</p>	
Local resident	<p>Disagrees with the Council's conclusion in Table 1, row 8, that it is not likely that the SPD will have any significant effect on the borough, beyond those effects that have already been assessed through the SA (including SEA) of the Local Plan and London Plan. Respondent states that an SEA is required owing to significant effects.</p>	<p>Disagree – the respondent does not specify what the significant effects are. For the reasons set out in the screening statement, the Council remains of the opinion that the SPD will not have any significant effect on the environment, beyond those effects that have already been assessed through the SA (including SEA) of the Local Plan and London Plan.</p>
	<p>Respondent does not accept comments in relation to Table 2, section 1, item 2. The LBB reply is that it has 'limited (if any) influence'. However this is the document that is subjected to consultation. An agreed SPD should be a significant guidance document.</p>	<p>Disagree – the SPD does not create new policy, which limits the influence over other plans and programmes. The fact that the document has been consulted on is irrelevant in terms of its influence. The key issue is its place within the statutory framework.</p>
	<p>Respondent does not accept comments in relation to Table 2, section 2, item 3. Depending on the development there could be significant 'Transboundary Impacts'</p>	<p>Disagree – the respondent does not elaborate on what significant transboundary impacts could occur. The respondent's comments are also based on the potential impact of a specific development, whereas the SPD will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough.</p>
	<p>Respondent does not accept comments in relation to Table 2, section 2 item 4. Depending on the development there could be significant risk to human health AND the environment.</p>	<p>Disagree – the respondent does not elaborate on what significant risks to human health and the environment could occur. The respondent's comments are also based on the potential impact of a specific development, whereas the SPD</p>

Consultee	Response	LBB comment
		will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough.
	Respondent does not accept comments in relation to Table 2, section 2 item 6. Depending on the development there could be significant loss of views, overshadowing of Conservation Areas, requirements to upgrade and improve infrastructure: roads, footpaths, transport, support services and statutory services.	Disagree – the respondent’s comments are based on the potential impact of a specific development, whereas the SPD will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough.
	Respondent does not accept comments in relation to Table 2, section 2 item 6 and item 7 (last). These two clauses appear to contradict each other. Priory Gardens has a ‘Site of Interest for Nature Conservation status’ SINC.	Disagree – there is no contradiction as the respondent seems to have misunderstood the different types of designation covered by the different criterion. A SINC is Local Plan designation that reflects special natural characteristics; therefore it is relevant to the criterion in section 2, row 6. A SINC is not a landscape designation relevant to the criterion in section 2, row 7.
	Respondent does not accept statement at paragraph 5.1. Depending on the type, scope and time scale of Development there could be significant impact. A SEA will be required.	Disagree – as noted above, the Council considers that an SEA is not necessary. The respondent’s comments are also based on the potential type, scope and timescale of a specific development, whereas the SPD will provide supplementary guidance to the Local Plan and London Plan which provide the overarching framework for assessing development in the Borough.

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Agenda Item 7

Report No.
HPR2023/029

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: **DEVELOPMENT CONTROL COMMITTEE AND RENEWAL,
RECREATION AND HOUSING PDS COMMITTEE**

Date: **Tuesday 13 June 2023 / Thursday 15 June 2023**

Decision Type: Non-Urgent Non-Executive Non-Key

Title: **ENFORCEMENT PLAN 2023**

Contact Officer: Angela Sheppard, Planner, John Stephenson, Enforcement & Appeals
Manager
Tel: 020 8461 7536, Tel: 0208 461 7887 E-mail:
Angela.Sheppard@bromley.gov.uk, John.Stephenson@bromley.gov.uk

Chief Officer: Assistant Director (Planning)

Ward: All Wards

1. Reason for decision/report and options

- 1.1 To review the existing Enforcement Plan and update to reflect the current status, including an additional procedural flowchart.
-

2. **RECOMMENDATION(S)**

- 2.1 **Development Control Committee and Renewal, Recreation and Housing PDS Committee Members are to note the contents of the attached revised Enforcement Plan and flowchart.**

Impact on Vulnerable Adults and Children

1. Summary of Impact:
-

Transformation Policy

1. Policy Status: Existing Policy
 2. Making Bromley Even Better Priority
(4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: £N/A
 5. Source of funding: £N/A
-

Personnel

1. Number of staff (*current and additional*):
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory Requirement
 2. Call-in: Not Applicable: No Executive decision.
-

Procurement

1. Summary of Procurement Implications: N/A
-

Property

1. Summary of Property Implications: N/A
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: N/A
-

Impact on the Local Economy

1. Summary of Local Economy Implications: N/A
-

Impact on Health and Wellbeing

1. Summary of Health and Wellbeing Implications: N/A
-

Customer Impact

1. Estimated number of users or customers (*current and projected*): All Borough residents.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: N/A

3. COMMENTARY

- 3.1 The Enforcement Plan has been reviewed and revised to incorporate more in depth procedural guidance including enforcement action in relation to protected trees within the borough and the role of Building Control in relation to unauthorised work or where there is concern over safety.

Non-Applicable Headings:	Impact on vulnerable adults and children Transformation/policy implications Financial implications Personnel implications Legal implications Procurement implications Property implications Carbon reduction/social value implications Impact on the local economy Impact on health and wellbeing Customer impact Ward Councillors views
Background Documents: (Access via Contact Officer)	Existing Enforcement Policy

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INTRODUCTION

A breach of planning control is defined in Section 171A of the Town and Country Planning Act 1990 as:

- ***The carrying out of development without the required planning permission; or***
- ***Failing to comply with any condition or limitation subject to which planning permission has been granted.***

Local planning authorities have responsibility for taking whatever enforcement action may be necessary, in the public interest, in their administrative areas.

The borough of Bromley is the largest in London by area and occupies 59 square miles of which the majority is Metropolitan Green Belt land and is perhaps the most rural. There are 47 conservation areas in Bromley, designated because of their special architectural or historic interest.

The enforcement of planning control is very important to the borough in order to:

- Investigate all alleged breaches of planning control including, unauthorised development, changes of use, non-compliance with conditions, unauthorised works on trees within conservation areas and protected trees (TPO), untidy sites and control of advertisements.
- Remedy the unacceptable harmful effects of any identified breaches of planning control and consider further action.

- Help protect the credibility of the planning system, and to ensure fairness for those who do adhere to planning controls.
- Ensure that works and uses are carried out in compliance with planning permissions and conditions unless variations are properly justified on planning grounds.
- Ensure the adopted planning policies applicable to this borough are properly implemented.
- Assess valid high hedge cases where complaint criteria are met and where required, issue remedial notices to achieve justified outcomes.

It is an important principle of the planning system of this country that the use of formal planning enforcement action is a **discretionary power of the Council** that, in most cases, is only justified to remedy a harm caused by a breaches of planning control.

The present enforcement regime dates from around 1990 and its evolution over the past 30 years provides the context for the current system. Significant improvements to the enforcement system were made following the Carnwath Report on Enforcing Planning Control (1989). Subsequently legislation, including the Town and Country Planning Act 1990 and the Planning and Compensation Act 1991, introduced additional measures such as Planning Contravention Notices and Breach of Condition Notices to deal with breaches of planning control more effectively.

The National Planning Policy Framework (NPPF) (paragraph 59) provides policy guidance stating that:

“Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the

implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.”

It should also be noted that, other than in respect of works to a listed building, the felling or pruning of preserved trees or the display of a sign or advertisement, it is not illegal to carry out works without the benefit of planning permission or other related consents.

Works carried out without the benefit of planning permission are termed as being “unauthorised”. The retention of unauthorised works only becomes illegal if such works are retained in contravention of an Enforcement Notice that has come into effect and is not the subject of a current appeal.

INVESTIGATING ALLEGED BREACHES

Not all building works, changes of use, demolitions, advertisement signs or tree works require permission from the Council, as local planning authority. However, when they do, breaches in planning control regulations could include:

- Unauthorised building development
- Unauthorised changes of use
- Non-compliance with plans or conditions
- Protection of listed buildings and Trees in Conservation areas
- Contravention of Tree Preservation Orders (TPO)
- Non-compliance with enforcement notices
- Untidy Sites
- Unlawful advertisements



Enforcement Priorities

The Council should ensure that its resources are used in the most effective manner, and it is common practice to prioritise enforcement cases according to the degree of harm being caused by the breach as follows:

High Priority – unauthorised development that causes immediate irreparable harm in the locality, eg. erection of a building without permission, unauthorised works to a listed building, felling of protected trees, deposit of waste material. Ward Members may wish to call in some enforcement matters that are causing serious harm to their constituents or ward area.



Medium Priority – Unauthorised development that causes some harm to the locality but not to the extent that 'high priority' applies. Examples might include vehicle repairs, erection of domestic extensions or outbuildings, pruning of protected trees, change of use of agricultural buildings or breaches of planning control relating to hours of use.

Low Priority – A full expediency test is carried out on breaches of planning control which may cause little or no harm to the locality. This may also include advertisements, erection of fences or outbuildings or marginally/de-minimis development, in excess of permitted development tolerances or minor variations to approved plans which have no material impact on the amenities of local residents. In some cases in relation to trees on privately owned land, compliance conditions and remedial notices may also not be considered expedient to take any further action.

What we do not investigate:

- Matters relating solely to methods of building construction
- Matters relating to private rights of access, neighbour and boundary disputes
- Land ownership disputes
- Matters relating to the restrictions imposed on property by a covenant
- Health and safety and the behaviour of those working on a development site
- Disturbance to protected wildlife



Time limits for taking enforcement action?

In most cases, development becomes immune from enforcement if no action is taken:

- within 4 years of substantial completion for a breach of planning control consisting of operational development;
- within 4 years for an unauthorised change of use to a single dwellinghouse;
- within 10 years for any other breach of planning control (essentially other changes of use).
- Unlimited for felling or destruction of protected trees and within 3 years for summary offences as stated in Section 210 of the Town and Country Planning Act 1990



When a breach of planning regulations is discovered, officers will deal with these according to the following procedures and principles:

Reporting a complaint

Confidentiality of a complainant's identity will be safeguarded at all times

To initiate a planning enforcement investigation, complaints should normally be made in writing by letter, email or via the standard complaints form provided on the Council's website. These should include the identity and address of the writer, the site address at which the alleged breach of planning control has taken place, a short description of what is alleged to be a breach of planning control and what is considered to be the harm caused by it.



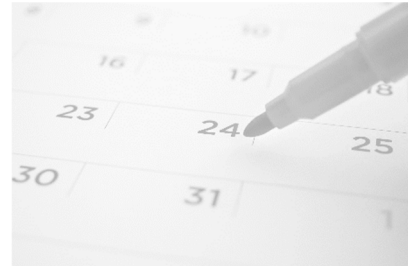
In exceptional circumstances, such as when emergency action is required, or when there is a special reason why writing is difficult or impossible, then investigations can be initiated by a telephone call.

An equal duty exists to the complainant and the alleged contravener to resolve matters fairly and consistently. Planning applications and appeals have clearly defined targets for determination, for example 8 weeks for a planning application. Defining targets for

enforcement cases is less straightforward as there are many variables which are beyond the Council's control. For the process to be transparent and fair to all the following targets may be defined:

Complainant – targets and timescales (see flow chart Appendix 1)

- Complaint acknowledged within 5 working days
- Site visit within 10 working days wherever possible
- Complainants advised of progress at significant stages throughout the process
- Notify complainant when notice issued within 10 working days
- Notify complainant if appeal lodged within 10 working days
- Notify complainant of closed case and reasons why within 10 working days.

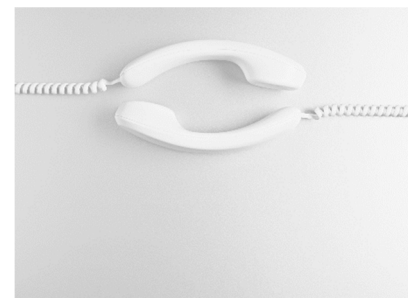


Communication with alleged contravener

The usual approach before taking formal enforcement action is for the officer concerned to, fully and openly discuss the circumstances of the breach and where possible resolve any points of difference in all cases.

A Planning Contravention Notice will be issued by legal to assist in the investigation.

A warning will normally be given (including a formal caution of the works carried out are potentially illegal), and a time period to comply with the legislation. In such cases written notices of the breach and the requirements to conform to the legislation will be given before any action is taken. However, this may not be possible if urgent or immediate enforcement action needs to be taken.



Contravener – targets and timescales

- Contact owner/occupier and visit site within 10 working days
- If breach identified, advise owner/occupier of the remedial steps required, timescale and consequences of taking no action within 10 working days of site visit
- If breach accords with planning policies request application for retrospective planning permission to be submitted within 14 days



- If development does not accord with policy allow a reasonable period (at least 14 days dependent on the type of breach) to rectify voluntarily
- Failing the above, seek authority to take appropriate action to rectify breach
- Send letter before action giving prior notice of taking formal action
- Notify offender of proposed course of action.

Outcome of investigation

There are several possible outcomes of an enforcement investigation, which may be summarised as follows:

- No breach identified
- Breach identified but not expedient to take any further action
- Permitted development (planning permission not required)
- Development immune from enforcement action
- Breach remedy achieved
- Retrospective application requested
- Formal enforcement action (serving of a notice)

A range of powers are available when a negotiated resolution cannot be achieved.

- Planning Contravention Notice
- Enforcement Notice
- Breach of Condition Notice
- Untidy Site Notice (S215)
- Advertisement Proceedings
- Prosecution
- Direct Action [charge will be put on land or property]
- Injunction



Failure to comply with a notice

As soon as the compliance period for an Enforcement Notice or a Breach of Conditions Notice has passed, we will carry out further investigations to confirm whether the breach is continuing.

When we believe an Enforcement Notice has been fully complied with, we will confirm this to the owner/occupier of the land, and to anyone who has complained about the

development or activity. Even after compliance, the notice will remain as a charge on the land to prevent any re-occurrence of the breach.

Further negotiations may be needed for full compliance with the notice. If a criminal offence is suspected, the gathering of evidence during a site inspection may have to be carried out under caution. Interviews would be carried out in accordance with the [Police and Criminal Evidence Act 1984](#) (PACE).

A planning breach only becomes a criminal offence when an owner/occupier fails to comply with the requirements of an Enforcement Notice or BCN.

Failure to comply with an Enforcement Notice

We take firm action when the requirements of an Enforcement Notice are not complied with. Such action may involve:

- prosecution of the parties concerned in the local courts – depending upon the availability, nature and strength of evidence
- issuing an injunction through the high court
- direct, or 'default' action – we will seek to recover the costs of such action from the persons responsible for the breach

We usually seek to bring the matter to a successful conclusion as quickly as possible through the action in the courts. When someone is found guilty of failing to comply with an Enforcement Notice, the fine may be:

- a maximum of **£20,000**, if imposed by the Magistrates Court
- **unlimited**, if imposed by the Crown Court

Prosecutions will continue to be brought until the notice has been complied with.

If an appeal against an Enforcement Notice is lodged with the Secretary of State, the outcome of the appeal will be awaited before we take further action. If an appeal has been considered and found in our favour, compliance with the Enforcement Notice requirements will be firmly pursued.

Failure to comply with a BCN

If a BCN has not been complied with, or a breach re-occurs, the party responsible will be asked to state what steps have occurred to secure compliance with the conditions specified in the notice. If no reasonable steps have been taken or any reasonable explanation is not given the council will normally pursue a prosecution.

Failure to comply with a BCN carries a maximum penalty of **£2,500**. A person may be convicted of a second, or subsequent, offence if they are fined but still fail to comply with the notice. It is for anyone charged with this offence to prove that they had a reasonable excuse for failing to comply.

Prosecutions are carried out in the interests of justice and not solely for the purpose of achieving a conviction. Once we have started taking action in court we may not withdraw, even if the breach of planning control is rectified before the case is heard – particularly if we have incurred significant costs. The matter will be considered in the public interest and on legal advice.

Injunction

In the case of a persistent offence involving unauthorised activity, an injunction may be sought through the County Court or High Court. In these circumstances, more severe penalties may be imposed if the offence continues.

Direct or default action

In certain circumstances we will consider taking direct or default action to remedy a planning breach. This may involve the use of contractors to enter a site and physically remove or put right unauthorised building work.

Such circumstances are likely to arise, for example, when there is ongoing non-compliance with an enforcement notice and we consider that the landowner will not resolve the issues. In such cases we will seek to recover our costs, possibly in the form of a charge on the land, which is recoverable at the time of any future sale of the land or property.

Penalty for Trees

There is also [a duty requiring landowners to replace a tree removed, uprooted or destroyed in contravention of an Order](#), unless dispensed.

Anyone found guilty in the magistrates' court of an offence under [section 210\(4\)](#) is liable to a fine of up to Level 4 (currently £2,500).

Scale of fines for summary offences:

Level 1	£200
Level 2	£500
Level 3	£1,000
Level 4	£2,500



Higher offences:

a maximum of **£20,000**, if imposed by the Magistrates Court and **unlimited**, if imposed by the Crown Court.

The majority of decisions on enforcement matters are made under powers delegated to the Assistant Director or Head of Planning and Development Support or Head of Building Control by this Development Control Committee. A full expediency test is carried out on breaches of planning control which may cause little or no harm to the locality. This may also include advertisements, erection of fences or outbuildings or marginally/de-minimis development in excess of permitted development tolerances or minor variations to approved plans which have no material impact on the amenities of local residents. In some cases in relation to trees on privately owned land, compliance conditions and remedial notices may also not be considered expedient to take any further action.

Building Control

Unauthorised work

Building Control team will investigate alleged unauthorised work or where there is a concern over safety.



However, there are exceptions.

The building control for over half of the building projects in Bromley is provided by private building control companies. These are called Approved Inspectors. The Approved Inspector must serve an Initial Notice to the Council of their intention to carry out the Building Control function.

Approved Inspectors are completely independent to the Council. When there is a valid Initial Notice in place, we have no legal jurisdiction to interfere.

On receiving a complaint about work that is subject to an Initial Notice, we will bring this to the attention of the Approved Inspector and recommend that they schedule a site visit.

Where there is a contravention that the Approved Inspector cannot resolve with the developer, they will revert the work to the Council because they have no enforcement

powers. In this instance, the Initial Notice is thus invalid and Building Control will investigate and take action as required on resolving the contravention.

Dangerous Structures

Reports of dangerous structures are investigated within 1-2 hours. If there is an imminent threat to public safety, emergency work will be undertaken to secure or remove the structure. The cost of such will be recovered from the owner of the building or structure.



Party Wall and boundary disputes

Boundary and party wall disputes fall under civil law, the Council has no jurisdiction. We would direct the complainant to their Party Wall surveyor or the Royal Institution of Chartered Surveyors (RICS) who would be able to give advice.

Site Safety Matters

Site health and safety matters fall under the remit of the Health and Safety Executive (HSE) and should be reported directly by the complainant. If the building control is being carried out by the council, we would normally visit the site and raise the concern with the site manager.

Contacts and Further Information

Our service provides a range of supplementary planning guidance, design guidelines, planning and Building Control information and forms. These can be obtained by:

- Calling Planning Investigation team **020 8461 7730**
- Emailing planninginvestigation@bromley.gov.uk
- Calling Telephone Enquiry team **020 8313 4956**
- Looking at our website www.bromley.gov.uk
- By writing to us at: **Planning Investigation, Bromley Civic Centre, Stockwell Close, Bromley, BR1 3UH**
- Trees: trees@bromley.gov.uk for unauthorised tree works to protected trees
www.bromley.gov.uk/trees/report-tree-problem
- Building Control: buildingcontrol@bromley.gov.uk: for unauthorised work and dangerous structures
- www.hse.gov.uk
- www.rics.org/uk
- Public Protection: [Construction or demolition noise – London Borough of Bromley](#)

Planning Investigation and Enforcement Process flowchart

