



BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

TELEPHONE: 020 8464 3333

CONTACT: Philippa Gibbs
philippa.gibbs@bromley.gov.uk

DIRECT LINE: 020 8461 7638

FAX: 020 8290 0608

DATE: 10 October 2023

To: Members of the
EXECUTIVE

Councillor Colin Smith (Chairman)

Councillor Kate Lymer (Vice-Chairman)

Councillors Yvonne Bear, Nicholas Bennett J.P., Aisha Cuthbert, Christopher Marlow,
Angela Page and Diane Smith

A meeting of the Executive will be held at Bromley Civic Centre on **WEDNESDAY 18
OCTOBER 2023 AT 7.00 PM**

TASNIM SHAWKAT

Director of Corporate Services & Governance

Copies of the documents referred to below can be obtained from
<http://cds.bromley.gov.uk/>

A G E N D A

1 APOLOGIES FOR ABSENCE

2 DECLARATIONS OF INTEREST

3 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 20 SEPTEMBER 2023
(Pages 3 - 20)

4 QUESTIONS

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 5pm on **Wednesday 4 October 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 **5pm on Thursday 12 October 2023.**

**5 CHURCHILL THEATRE & CENTRAL LIBRARY BUILDING, HIGH STREET,
BROMLEY BR1 3UH (Pages 21 - 32)**

6 RELOCATION OF CENTRAL LIBRARY (Pages 33 - 42)

- 7 **LEISURE CENTRE MAJOR WORKS PROGRAMME** (Pages 43 - 132)
- 8 **ADOPTION OF THE BROMLEY TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT** (Pages 133 - 294)
- 9 **OUR BROMLEY MAGAZINE** (Pages 295 - 302)
- 10 **CONSIDERATION OF ANY OTHER ISSUES REFERRED FROM THE EXECUTIVE, RESOURCES AND CONTRACTS POLICY DEVELOPMENT AND SCRUTINY COMMITTEE**
- 11 **LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) (VARIATION) ORDER 2006 AND THE FREEDOM OF INFORMATION ACT 2000**

The Chairman to move that the Press and public be excluded during consideration of the items of business listed below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.

<u>Items of Business</u>	<u>Schedule 12A Description</u>
12 EXEMPT MINUTES OF THE MEETING HELD ON 20 SEPTEMBER 2023 (Pages 303 - 308)	
13 PART 2: CHURCHILL THEATRE & CENTRAL LIBRARY BUILDING, HIGH STREET, BROMLEY BR1 3UH (Pages 309 - 316)	Information relating to the financial or business affairs of any particular person (including the authority holding that information)
14 PART 2: RELOCATION OF CENTRAL LIBRARY (Pages 317 - 320)	Information relating to the financial or business affairs of any particular person (including the authority holding that information)
15 PART 2: LEISURE CENTRE MAJOR WORKS (Pages 321 - 372)	Information relating to the financial or business affairs of any particular person (including the authority holding that information)

.....

EXECUTIVE

Minutes of the meeting held on 20 September 2023 starting at 7.00 pm

Present:

Councillor Colin Smith (Chairman)
Councillors Kate Lymer (Vice-Chairman), Yvonne Bear,
Aisha Cuthbert, Christopher Marlow, Angela Page and
Diane Smith

Also Present:

Councillor Simon Fawthrop, Councillor Alisa Igoe,
Councillor Julie Ireland, Councillor Simon Jeal, Councillor
Tony McPartlan and Councillor Chris Price

50 APOLOGIES FOR ABSENCE

There were no apologies for absence, although Members noted that Councillor Nicholas Bennett had joined the meeting virtually.

51 DECLARATIONS OF INTEREST

Councillor Nicholas Bennett declared that he hosted two Ukrainian families.

52 TO CONFIRM THE MINUTES OF THE MEETING HELD ON 9 AUGUST 2023

RESOLVED that the minutes of the meeting held on 9 August 2023 (excluding exempt information), be confirmed as a correct record.

53 QUESTIONS

Four questions for oral response had been received and these are attached at Appendix A..

54 BUDGET MONITORING 2023/24 Report FSD23059

The report provided the first budget monitoring position for 2023/24 based on expenditure and activity levels up to the end of June 2023. The report also highlighted any significant variations which would impact on future years as well as any early warnings that could impact on the final year end position.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations. Following concerns expressed at the

Executive Resources and Contracts PDS Committee earlier in the week by several Members that increasing costs were challenging the viability of the Council's move of Head Quarters from the Civic Centre to Churchill Court, the Leader requested that Officers confirm that such concerns were misplaced and to reiterate the facts of matter on the record.

The Director of Finance reported that, based on the revised updated capital costs, there was an overall net saving of £15m compared with refurbishment of the civic centre for office accommodation. Although there would be transition running costs allowing for the dual running of business rates and various other costs, the opportunity to generate additional rent income would lead to medium- and longer-term annual savings of £1.4m per annum by using the new site.

The Director of Housing, Planning and Regeneration separately referred to further savings from releasing other Council sites and reducing the overall costs and liabilities for those sites which had not been reflected in the savings identified above either.

The Leader added that was increasingly optimistic this surplus would be boosted further over coming months when the bids for the current Civic Centre site were revealed, given extraordinary interest which had been demonstrated to date in terms of its future use.

RESOLVED: That

- 1. The latest financial position be considered;**
- 2. That a projected net overspend on services of £6,137k forecast based on information as at June 2023 be noted;**
- 3. The comments from Chief Officers detailed in Appendix 2 be noted;**
- 4. The carry forwards being requested for drawdown as set out in paragraph 3.3 of the report be noted;**
- 5. A projected reduction to the General Fund balance of £445k as detailed in section 3.4 be noted;**
- 6. The full year cost pressures of £9.750m as detailed in section 3.5 be noted;**
- 7. The release of funding from the 2023/24 central contingency as detailed in paragraphs 3.2.2 to 3.2.15 be agreed;**
- 8. The use of the Homes for Ukraine grant in para. 3.9 be noted;**
- 9. Any issues that should be referred to individual Portfolio Holders for further action be identified.**

55 CAPITAL PROGRAMME MONITORING 2023/24
Report FSD23056

The report summarised the current position on capital expenditure and receipts following the first quarter of 2023/24 and seeks the Executive's approval to a revised capital programme.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

1. **The report, including a total re-phasing of £60,366k from 2023/24 into future years, be noted and a revised capital programme be agreed.**
2. **The need going forward, given the full utilisation of capital receipts by 2025/26 forecast in this report and the limited options to replenish this resource in the future, to consider funding options for all new schemes, including external borrowing where appropriate be noted.**
3. **Council be recommended to approve the following amendment to the capital programme (paragraph 3.3)**
 - (i) **increase of a total £2,656k in relation to Disabled Facilities Grant (£2,443k original award plus £213k supplementary award)**
 - (ii) **increase of £55k in relation to Devolved Formula Capital**
4. **It be noted that a report elsewhere on the agenda requests a supplementary capital estimate of £4,250k for additional costs associated with the move to Churchill Court, to include the use of £2,250k from the Growth Fund**
5. **It be noted that a report elsewhere on the agenda requests the addition of £25,500k for a housing scheme at Bromley North and £15,200k for a housing scheme at Beckenham.**

56 OFFICE FOR LOCAL GOVERNMENT AND THE LOCAL AUTHORITY DATA EXPLORER

The report provided a briefing on the new Office for Local Government, its intended purpose and planned activity. The Department for Levelling Up, Housing and Communities (DLUHC) established the Office for Local Government (Oflog) in July 2023.

In launching Oflog, DLUHC referenced Local Councils as a critical partner in the Government's objective to 'level up'. Acknowledging that there is no shared view of what 'good performance looks like' in local government Oflog will address this by "improving access to data, increasing transparency and fostering accountability – while also highlighting excellence and showcasing success."

DLUHC have emphasised that Oflog is not a replacement for the withdrawn Audit Commission. Oflog will not produce performance league tables; nor will it add new responsibilities on local authorities. Instead Oflog will recognise and celebrate councils, so others can learn from them. It will also start to detect local authorities at risk of potential failure earlier in the process of

decline. Where local authorities are identified as 'at risk of failure', Oflog will convene dialogues between councils and expert local leaders to explore the issues in more detail.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

- 1. The establishment of the Office for Local Government be noted.**
- 2. The initial key metrics launched to monitor the effectiveness of local authorities be noted; and**
- 3. Bromley's relatively good performance against all 18 metrics be noted.**

**57 AWARD OF CONTRACT FOR WORK AT NEW CIVIC OFFICES
Report ESD20315**

A report went to the Executive on 30th November 2022 and then went to Full Council on 12th December 2022 setting out the recommendations to purchase the freehold of the Direct Line Site known as Churchill Court with a view to moving the Council's offices off the Civic Centre site and disposing of the same.

The Part 2 report sets out the outcome of the tender process and award of contract for the construction fit out and building conversion.

The Part 2 report covers the programme budget which has now been refined and set out in this report. In addition, this report updates Members on the dual running costs and overall programme timetable.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations.

RESOLVED: That the report be noted.

58 BIGGIN HILL AIRPORT NOISE ACTION PLAN UPDATE

At the meeting of the Executive on 8 February, Officers, in consultation with the Portfolio Holder for Resources, Commissioning and Contract Management, were authorised to work with Biggin Hill Airport Limited (BHAL) regarding the Noise Action Plan, with the objective of agreeing enhancements to improve the situation for residents under the flightpath.

It was also agreed that an update would be provided back to the Executive after six months.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had

supported the recommendations and made the following additional recommendation:

(3) That Members note that if no substantive progress is made by January 2024 alternative options for progressing matters will be reported back to the Executive for consideration.

RESOLVED: That

- 1. It be noted that a specialist aviation consultant, Vanguardia, has been appointed to advise the Council on the Noise Action Plan and best industry standards around noise reduction and abatement.**
- 2. It be noted that correspondence with BHAL is ongoing, and a further update will be reported back to the Executive in January 2024. The Council is working towards reaching a substantive agreement on the Noise Action Plan and related matters by that date.**
- 3. It be noted that if no substantive progress is made by January 2024 alternative options for progressing matters will be reported back to the Executive for consideration.**

**59 HOUSING DELIVERY UPDATE
Report HPR2023/051**

Following the Operational Property Review in November 2022, the report provided an update on the Council owned sites that have been earmarked for affordable housing development as well as an update on the Greater London Authority (GLA) grant for affordable home with recommendations in relation to progressing sites for social housing provision.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations and endorsed the following additional recommendation:

(4) Members are asked to note that tenancies on new builds are offered initially on a starter tenancy, and tenants are made aware of their rights on their tenancy including any right to buy as may become appropriate during their tenancy periods.

In considering the additional recommendation from the Executive, Resources and Contracts PDS Committee, Members of the Executive noted the recommendation, recognising that the issue set out statutory requirements. As such, the Executive noted the comments but agreed that it would not be adopted as a formal resolution.

RESOLVED: That

1. **Accepting the revised Greater London Authority (GLA) Grant of £37,959k to support the delivery of 217 (note this is for the Grant, not the number that may be delivered) affordable homes through the indicative sites, set out below be approved:**
 - **Bromley North**
 - **Beckenham**
 - **Bellegrove (subject to further feasibility works to be reported to the Executive)**
 - **Manorfields (subject to further viability assessment to be reported to the Executive)**
 - **Poverest (subject to further viability assessment to be reported to the Executive)**
2. **External borrowing in relation to the financing requirements of the Bromley North and Beckenham capital financing requirements, as set out in section 6 of this report be approved.**
3. **The following recommendations in relation to each site listed above be approved:**

Bromley North

- (a) **Subject to the determination of the Bromley North Planning Application, expected in October 2023:**
 - ii. **Authorise the addition of the Bromley North Scheme to the Capital Programme at an estimate of £25.5m noting that this is the scheme cost, not the cost to the Council, and note that the Council is foregoing a potential capital receipt of £5.0m in relation to this site.**
 - iii. **Approve the allocation of £515k of S106 funding towards the affordable housing element of the Bromley North Scheme.**
 - iv. **Approve the acceptance of the £720k grant from the BLRF towards the Bromley North Scheme, delegating authority to the Director of Housing, Planning, Property & Regeneration in conjunction with Director of Corporate Services to agree legal matters related to the grant and discharge of conditions.**
 - v. **Approve award of contract, as set out in paragraphs 3.12 to 3.14, to the provider named in the Part 2 Report for multi-disciplinary consultancy services for RIBA Stages 3b to 7 of the Bromley North Scheme at an estimated whole life value as detailed in the Part 2 Report, noting there will be a break clause in the contract at RIBA Stage 4a should the scheme not progress to award of contract for construction works.**
 - vi. **Note, as set out in paragraph 3.15, that Cost and Project Management services for the Bromley North scheme will be tendered separately to ensure stringent financial governance. The estimated value of those contracts is £390k and will, subject to Executive approval of the main recommendations, proceed to procurement and award within Officer delegated authority.**

- vii. Approve proceeding to procurement, as set out in paragraph 3.11 and paragraphs 3.16 – 3.17, via a compliant route (either framework or closed tender process) for a works contractor for the initial enabling works for Bromley North at an estimated value of £720k in line with BLRF grant conditions, noting that the commencement of the enabling works contract will be dependent on award of contract for the main construction contract for the entire development of the scheme.
- viii. Approve, in principle as set out in paragraph 3.18, proceeding to procurement for the design and build works contract at the end of RIBA Stage 4a for the Bromley North scheme at an estimated value of £21m, with delegated authority to the Director of Housing, Planning, Property & Regeneration to approve the detailed procurement strategy in agreement with the Portfolio Holder, the Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance, noting that award of contract and commencement of the scheme if considered financially viable will be subject to Executive decision in due course.
- ix. Approve the implementation, as far as possible, of recommendations 2.4.1 to 2.4.7 in the event of the Bromley North Planning decision being deferred, noting that no contracts will be awarded until and if Planning is secured; and noting that if the Bromley North Planning application is not granted then none of the recommendations will be taken forward.

Beckenham Site

- (a) Subject to undertaking sufficient public engagement, the submission of the Beckenham Car Park (Appendix B) scheme to Planning be approved, noting that the site has already been developed to RIBA Stage 3a. It be noted that if the scheme is not submitted within the near future, there is a risk that the surveys procured as part of the planning process will be superseded by forthcoming policies and will therefore need to be re-commissioned at an additional cost.
- (b) The addition of the Beckenham Site to the Capital Programme be authorised at an estimate of £15.2m noting that this is the scheme cost, not the cost to the Council, and it be noted that the Council is foregoing a potential capital receipt of £0.9m in relation to this site.
- (c) In principle as set out in paragraph 3.23 of the report, proceeding to procurement for multi-disciplinary consultancy services for RIBA Stages 3b to 7 for the Beckenham Scheme at an estimated whole life value of £669k be approved, with authority delegated to the Director of Housing, Planning, Property & Regeneration to approve the detailed procurement strategy in agreement with the Portfolio Holder, the Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance, noting that award of contract will be subject to Portfolio Holder decision in due course.
- (d) It be noted, as set out in paragraph 3.24 of the report, that Cost and Project Management services for the Beckenham scheme will be tendered separately to ensure stringent financial governance. The

estimated value of those contracts is £167k and will, subject to Executive approval of the main recommendations, proceed to procurement and award within Officer delegated authority.

Bellegrove, Manorfields and Poverest Sites

- (a) It be approved that Feasibility funding for sites now added to the capital programme (West Wickham, Bromley North and Beckenham) are 'refunded' from the relevant capital budgets to allow detailed feasibility for Bellegrove, as well as further scoping for Manorfields and Poverest sites.
- (b) It be approved that, in principle as set out in paragraph 3.27 – 3.29, proceeding to procurement for multi-disciplinary consultancy services for RIBA Stages 2 to 7 for the Bellegrove Scheme at an estimated whole life value of £1.5m, with delegated authority to the Director of Housing, Planning, Property & Regeneration to approve the detailed procurement strategy in agreement with the Portfolio Holder, the Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance, noting that award of contract will be subject to Executive decision in due course, including detail on break clauses within the contract should the scheme not progress.
- (c) It be noted, as set out in paragraph 3.30 of the report, that Cost and Project Management services for the Bellegrove scheme will be tendered separately to ensure stringent financial governance. The estimated value of those contracts is £383k and will, subject to Executive approval of the main recommendations, proceed to procurement and award within Officer delegated authority.
- (d) It be approved that Bellegrove will commence a decant of the site from February 2024.
- (e) Bids for other grants towards housing schemes as may be available and appropriate be approved.
- (f) Authority be delegated to the Director of Housing, Planning, Property & Regeneration in conjunction with the Director of Corporate Services and Governance any legal matters related to the development of Council sites for housing, including Land Appropriation matters for both planning purposes and appropriation into the Housing Revenue Account upon completion of the schemes.
- (g) Authority be delegated to the Director of Housing, Planning, Property & Regeneration in conjunction with the Director of Corporate Services and Governance and the Director of Environmental Services relating to any matters of road adoptions or works with TFL as part of the Housing Schemes listed.
- (h) It be noted that a decision not to continue with any of the sites listed will result in a return of the GLA grant and/or the BLRF grant.

**60 HOUSING ALLOCATION SCHEME AND CHOICE BASED LETTINGS (APPROVAL TO PROCEED TO STATUTORY CONSULTATION)
Report HPR2023/049**

The current Allocation Scheme was first published in 2012, amended in 2015 and the last formal update made in 2017 following the introduction of the

Homelessness Reduction Act (2017). In order to ensure that the Scheme was contemporary and met all current legislative requirements a review of the Council's Allocations Scheme was approved in November 2022.

The report accompanied the Draft Allocations Policy and identified key changes alongside the indicative project delivery timescales.

The report had been scrutinised by the Renewal, Recreation and Housing PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

- 1. The Draft Allocations Policy be approved for eight weeks public consultation; and,**
- 2. It be noted that the results of the consultation together with any suggested amendments arising from this consultation will be reported back to the Executive for final approval and adoption of the Allocations Policy.**

**61 HOUSING MANAGEMENT CONTRACT (APPROVAL TO PROCEED TO TENDER)
Report HPR2023/048**

The report sought approval to proceed to procurement for the housing management and associated services for the Bromley owned portfolio.

The report detailed the findings of specialist legal and financial advice in relation to the Beehive portfolio and sought approval to proceed on the recommendation as set out in paras 3.11 to 3.17 of the report.

The report had been scrutinised by the Renewal, Recreation and Housing PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

- 1. Proceeding to procurement for housing management services for Bromley owned housing portfolio via a compliant open tender be approved. The estimated annual value being £2m with the contract to commence from 1 April 2024 for a ten-year term (with the option to extend for a further five years) at an estimated whole life value of £30m.**

2. **It be noted that, as per the previous report to Executive there are resource requirements that will be built up as part of the 2024/25 budget process in order to meet the Council's statutory obligations in relation to stock ownership and affordable housing management.**
3. **For the Beehive Scheme, following receipt of specialist legal and financial advice it be approved to proceed on the recommendation detailed for the future management of the portfolio, as set out in paragraphs 3.11 – 3.17 of the report.**

**62 HOMES FOR UKRAINE QUARTERLY UPDATE REPORT
Report HPR2023/032**

The report provided an update on the Homes for Ukraine response by the Council and approach going forward.

An update on the Homes for Ukraine scheme would be provided to Executive quarterly, this report was the third of the update reports.

The report had been scrutinised by the Executive, Resources and Contracts PDS Committee at its meeting on 18 September 2023 and the Committee had supported the recommendations.

RESOLVED: That the contents of this report be noted in relation to the current activities under the Homes for Ukraine scheme.

**63 LIBRARY WORKS PROGRESS AND CROFTON ROMAN VILLA
Report HPR2023/050**

The report provided an update on the library works programme, and information on repairs to Crofton Roman Villa. To enable the library works programme delivery pace to continue the Portfolio Holder and Executive were asked to agree to approve and delegate authority to enter into the contracts required to take forward repairs at Southborough and Beckenham libraries.

The report had been scrutinised by the Renewal, Recreation and Housing PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

1. **It be agreed to proceed to tender for the works contract for Beckenham Library at an estimated value of £1.4m;**
2. **Authority be delegated to the Director of Housing, Planning, Property and Regeneration in consultation with the Portfolio Holder for Renewal, Recreation and Housing, to award the works contract for Beckenham Library, estimated value £1.4m, as long as the winning tender is affordable within the Operational Property Review library programme budget;**

3. **The information on works to Crofton Roman Villa and the request as set out in paragraph 3.19 to utilise the OPR budget for this site as match funding towards bids for grants to improve the information on site and improve visitor experience be noted; and,**
4. **Authority be delegated to the Director of Corporate Services and Governance to enter into and manage legal matters relating to these works to allow works to progress.**

**64 FEASIBILITY FUNDING FOR REGENERATION OF STAR LANE TRAVELLER SITE
Report HPR2023/052**

On 30th November 2022, Executive (and Full Council in December 2022) agreed the budget for the Operational Property Review programme to be added to the Capital Programme. On 29 March 2023, Executive agreed the details of the Operational Property Refurbishment Programme, including proceeding to procurement for supporting services and works to deliver the Programme.

The Gypsy, Roma and Traveller (GRT) Site in Star Lane in St Mary Cray had been identified in the Operational Property Review as requiring significant works. Whilst a provisional sum had been allocated for these works, it was not possible to confirm a works budget without more detailed surveys of the site, as well as community engagement of the best way of moving forward and progressing works on site. The report sought approval for utilisation of £500k from the Operational Property Review capital budget for feasibility and engagement works.

The report had been scrutinised by the Renewal, Recreation and Housing PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

1. **The utilisation of £500k from the assigned Operation Property Review budget for feasibility works at the Star Lane Traveller Site be approved;**
2. **The intent to allocate resources for the delivery of the programme as set out in paragraphs 3.10 and 3.11 of the report, including procurement of necessary works and services to deliver the programme be noted;**
3. **An engagement programme with the residents of Star Lane to support a timetable for a works programme be approved;**
4. **The initiation of a planning application to make temporary use of the adjacent site to Star Lane for temporary pitches during a works programme be approved;**
5. **Road Adoption of a road into the site be approved, and authority be delegated to the Director of Corporate Resources and**

Governance for any necessary legal arrangements of Road Adoptions; and,

- 6. The corporate risk of the current condition of the site be noted.**

65 COMMUNITY HOUSE, SOUTH STREET, BROMLEY BR1 1RH & BECKENHAM PUBLIC HALLS, BROMLEY ROAD, BECKENHAM BR3 5JE - FREEHOLD DISPOSALS

The report sought authorisation to select a preferred purchaser following marketing of the below properties:

- Community House, South Street, Bromley BR1 1RH
- Beckenham Public Halls, Bromley Road, Beckenham BR3 5JE

The two properties were freehold interests held by the Council that had been identified as surplus to requirement to be included in the Disposal Programme as authorised by the Executive Committee in November 2022.

Capital receipts generated through the Disposal Programme are to be used to part fund the capital investment being undertaken across the Council's operational estate as set out within the Operational Property Review.

RESOLVED: That

Community House, South Street, Bromley BR1 1RH

- 1. Acceptance of Offer A received for the Council's freehold interest known as Community House, South Street, Bromley BR1 1RH be authorised and to proceed to completion with the transaction.**
- 2. Authority be delegated to the Director of Housing, Planning and Regeneration to finalise terms of sale in order to proceed with the transaction and conclude the disposal.**
- 3. Authority be delegated to the Director of Housing, Planning and Regeneration to accept Offer C, formalise the terms and complete the transaction, should Offer A fail to complete.**
- 4. The legal and professional costs associated with completing the transaction be funded from the capital receipt received.**
- 5. Details of the commercial terms of the offer being recommended for freehold disposal are commercially sensitive and therefore included within Part 2 of this report.**

Beckenham Public Halls, Bromley Road, Beckenham BR3 5JE

- 6. Acceptance of Offer A received for the Council's freehold interest known as Beckenham Public Halls, Bromley Road,**

Beckenham, BR3 5JE be authorised and to proceed to completion with the transaction.

- 7. Authority be delegated to Director of Housing, Planning and Regeneration to finalise terms of sale in order to proceed with the transaction and conclude the disposal.**
- 8. Authority be delegated to the Director of Housing, Planning and Regeneration to accept Offer B, formalise the terms and complete the transaction, should Offer A fail to complete.**
- 9. The legal and professional costs associated with completing the transaction be funded from the capital receipt received.**
- 10. Details of the commercial terms of the offer being recommended for freehold disposal are commercially sensitive and therefore included within Part 2 of this report.**

**66 SUBSTANCE MISUSE SERVICES CONTRACT AWARD
Report ACH23-033**

The Executive agreed on 30th November 2022 (Report ACH22-037) to proceed to procurement for the Bromley Substance Misuse Provider Service. The report detailed the outcome of the tender process and recommended contract award.

The report had been scrutinised by the Adult Care and Health PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That

- 1. The contract for the Bromley Substance Misuse Service be awarded to the Service Provider named in the Part Two Report, commencing 1st April 2024 for five years with an option to extend for up to a further three years at an estimated contract value as detailed in the Part Two report.**
- 2. Authority be delegated to the Chief Officer (Director of Public Health), subject to agreement with the Portfolio Holder, the Assistant Director Governance & Contracts, the Director of Finance and Director of Corporate Services and Governance, to apply the three year extension in due course.**
- 3. Authority be delegated to the Chief Officer (Director of Public Health), subject to agreement with the Portfolio Holder and the Director of Finance, to draw down expected Supplemental Substance Misuse Treatment and Recovery (SSMTR) Grants and future potential Substance Misuse grants that may be allocated by the Office for Health Improvements and Disparities (OHID) during the life of the contract.**

- 4. Authority be delegated to the Chief Officer, subject to agreement with the Portfolio Holder, the Assistant Director Governance & Contracts, the Director of Finance and Director of Corporate Services and Governance, to vary the Substance Misuse Provider Service contract as required to incorporate additional requirements linked to the allocation of the SSMTR grant and other future Substance Misuse grants that may be allocated.**

67 CARERS PLAN 2023-2025
Report ACH23-025

A carer is a person of any age who provides unpaid care and support to a family member, friend or neighbour who is disabled, has an illness or long-term condition, or who needs extra help as they grow older. Carers hold families and communities together, enable those they care for to get the most out of life, and make an enormous contribution to community life in Bromley. Alongside the Council's social care and SEND services and local NHS services carers play a vital role in supporting vulnerable residents.

The Council had developed a Carers Plan with the South-East London Integrated Care Board (Bromley) that set out what advice, guidance and support was available to unpaid carers in the Borough and how this offer to carers will be developed further over the next two years.

The report had been scrutinised by the Adult Care and Health PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That the proposed Carers Plan be approved.

68 ADULT SOCIAL CARE STRATEGY 2023-2028
Report ACH23-012

The Council had developed a new adult social care strategy for the period 2023 to 2028 to take account of developments across the social care market, changing government policy and wider technological, demographic and economic changes. The strategy considered the key challenges of increased service demand and rising costs pressures in relation supporting vulnerable older residents and working age adults with a disability and or a long-term health condition.

The report had been scrutinised by the Adult Care and Health PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations.

RESOLVED: That the proposed Adult Social Care Strategy 2023-2028 be approved.

**69 SECTION 256 - PROJECT FUNDING ALLOCATION
Report ACH23-037**

The South East London Integrated Care Board (ICB) had made available financial support to the London Borough of Bromley (LBB) to help provide the Borough with funding to support services to adults and children with autism and to support admission avoidance and prevention into adult Assessment and Treatment Units or children's CAMHS in patient provision.

This transfer of non-recurrent funds was being made via a Section 256 arrangement. Portfolio Holder and Executive approval was required before the funds were spent in accordance with the Council's financial guidelines.

The report had been scrutinised by the Adult Care and Health PDS Committee at its meeting on 5 September 2023 and the Committee had supported the recommendations in the report and made the following additional recommendation:

iv.) Note that the final non-recurring sum transferred for the Community Discharge Grant Funding is £281,000.

RESOLVED: That

- 1. The receipt of funds from the Integrated Care Board under a Section 256 Agreement be agreed;**
- 2. Contracts be awarded to the following organisations via an exemption from tendering:**
 - 18 months contract with Bromley Mencap for an Autism Pathway Project at a total cost of £82,321**
 - 12 months contract with Bromley Mencap for an All-Age Autism Specialist Welfare Benefit Service at a total cost of £58,769**
 - 12 months contract with CASPA for a Travel Support Programme at a total cost of £40,000;**
- 3. Authority be delegated to the Director of Adult Services, in consultation with the Portfolio Holder for Adult Care and Health Services, the Assistant Director Governance & Contracts, the Director of Finance and the Director of Corporate Services, to directly award the Community Discharge Grant funding; and,**
- 4) It be noted that the final non-recurring sum transferred for the Community Discharge Grant Funding is £281,000.**

**70 CONSIDERATION OF ANY OTHER ISSUES REFERRED FROM
THE EXECUTIVE, RESOURCES AND CONTRACTS POLICY
DEVELOPMENT AND SCRUTINY COMMITTEE**

There were no additional items referred from Executive, Resources and Contracts PDS Committee.

**71 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE
LOCAL GOVERNMENT (ACCESS TO INFORMATION)
(VARIATION) ORDER 2006 AND THE FREEDOM OF
INFORMATION ACT 2000**

RESOLVED that the Press and public be excluded during consideration of the items of business referred to below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.

**The following summaries
refer to matters involving exempt information**

**72 EXEMPT MINUTES OF THE MEETING HELD ON 9 AUGUST
2023**

The exempt (not for publication) minutes of the meeting held on 9 August 2023, were confirmed as a correct record.

**73 PART 2: AWARD OF CONTRACT FOR WORK AT NEW CIVIC
OFFICES**

The Executive considered the report and agreed the recommendations.

**74 PART 2: COMMUNITY HOUSE, SOUTH STREET, BROMLEY
BR1 1RH & BECKENHAM PUBLIC HALLS, BROMLEY ROAD,
BECKENHAM BR3 5JE - FREEHOLD DISPOSALS**

The Executive considered the report and agreed the recommendations.

75 PART 2 SUBSTANCE MISUSE SERVICES CONTRACT AWARD

The Executive considered the report and agreed the recommendations.

76 PART 2: CAPITAL PROGRAMME APPENDIX E

The Executive noted the Part 2 information.

77 PART 2: HOUSING DELIVERY UPDATE

The Executive considered the report and agreed the recommendations.

Chairman

The Meeting ended at 9.04 pm

This page is left intentionally blank

Agenda Item 5

Report No.

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

Date: 18th October 2023
For pre-decision scrutiny at the Executive, Resources and Contracts PDS Committee on 17 October 2023

Decision Type: Non-Urgent Executive Key

Title: CHURCHILL THEATRE & CENTRAL LIBRARY BUILDING, HIGH STREET, BROMLEY BR1 3UH

Contact Officer: Amy Milton, Assistant Director Strategic Property
E-mail: amy.milton@bromley.gov.uk

Chief Officer: Sara Bowrey, Director of Housing, Planning, Property and Regeneration
E-mail: sara.bowrey@bromley.gov.uk

Ward: Bromley Town Centre

1. Reason for report

- 1.1 The site known as Churchill Theatre forms part of a larger property which also comprises Central Library and a number of ground floor retail units. The building was constructed as one in the 1970s, formally opening in 1977.
- 1.2 The site is owned freehold by the Council, with Churchill Theatre being occupied by Trafalgar Group on a lease dated 5th September 2017 which expires on 3rd April 2041. Central Library is occupied and operated by the Council's library provider Greenwich Leisure, and the retail units are held on a long leasehold interest by a private third party.
- 1.3 Buildings of this nature were typically intended to have a lifespan of c. 50 years and as such, the building is now in poor condition, and many elements of the building and building fabric are considered end of life and beyond economic repair.
- 1.4 Therefore, continuing with the existing lease arrangement with Trafalgar Group for the theatre element until its natural expiry in 2041 is not considered a viable option, as the extent of the works required to ensure a sustainable future for the building would not be possible whilst the building is occupied and operational.
- 1.5 This report primarily relates to the Churchill Theatre element of the building, due to the lease arrangements that are in place and the commercial (i.e. non-operational / non-statutory) function of this element of the building, and the need to find a solution to the challenge of an end of life building, a limited pool of resources from which the Council must prioritise its statutory and operational needs, and the wider economic and cultural benefits that come with the presence of a theatre in the town centre.
- 1.6 This report sets out the Council's intention for seeking a mutual agreement between the Council and Trafalgar Group to ensure a sustainable future for the theatre at the site, whilst simultaneously removing the Council's ongoing liabilities for repairs and maintenance at the site.

2. RECOMMENDATION(S)

- 2.1 Members of the ERC PDS are asked to note the contents of this report and recommendations for the Executive to approve.
- 2.2 Members of the Executive are asked to note of the contents of this report and approve the following recommendations:
- a) To delegate authority to the Director of Housing Planning and Regeneration to agree terms with the existing tenant of Churchill Theatre, Trafalgar Group, to gift the Council's freehold interest in the whole site alongside negotiating a reverse premium to be paid to Trafalgar Group on completion of the freehold transfer to enable the tenant to invest in the building to ensure a sustainable future for the building and to protect its future use as a theatre. With terms, once agreed in principle, to be subject to further approval by the Executive Committee.
 - b) As detailed within this report, the existing arrangement is not sustainable as there are significant works required to the building if it is to have a future, and therefore the existing lease arrangement with Trafalgar Group needs to be terminated to enable the works required on the building to be undertaken which cannot be facilitated whilst the building is occupied and operational. It is therefore recommended that the Landlord's Break Clause in relation to the lease held by Trafalgar Group is triggered which must be served on or before 1st April 2024 in accordance with the terms of the existing lease providing a minimum of 24 months' notice thereby terminating the existing lease arrangement as of 2nd April 2026.
 - c) Should Trafalgar Group confirm they are unwilling or unable to take gifted ownership (and a reverse premium) of the site, then it is recommended that the Executive Committee delegate authority to the Director of Housing Planning and Regeneration to openly market a 999-year leasehold interest in the site to secure a private developer to undertake the required redevelopment under a Development Agreement, with the 999 year lease only being granted, with vacant possession, on completion of the agreed scheme as agreed and stipulated within the Development Agreement. All offers received would be reported back to the Executive Committee for a Member decision to enable Member selection of a preferred bidder.

Impact on Vulnerable Adults and Children

1. Summary of Impact: N/A
-

Corporate Policy

1. Policy Status: Existing Policy
 2. BBB Priority: Excellent Council
-

Financial

1. Cost of proposal:
 2. Ongoing costs:
 3. Budget head/performance centre:
 4. Total current budget for this head:
 5. Source of funding:
-

Personnel

1. Number of staff (current and additional): Not applicable
 2. If from existing staff resources, number of staff hours: Not applicable
-

Legal

1. Legal Requirement: Not applicable
 2. Call-in: Not applicable
-

Procurement

1. Summary of Procurement Implications: Not applicable
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Not Applicable
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Ward Cllrs were briefed on 31st May 2023 as to the ongoing discussions with the tenant.
2. Summary of Ward Councillors comments: Ward Cllrs support the Theatre and accept the position that the Council cannot continue as is due to the condition of the building.

3. COMMENTARY

The Site

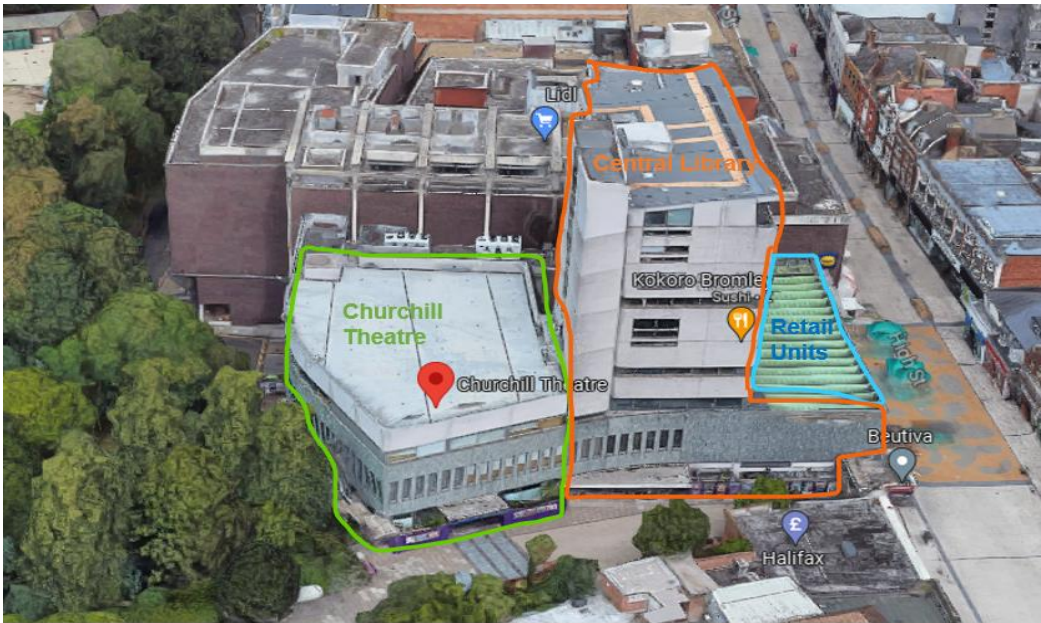
3.1 The site known as Churchill Theatre forms part of a larger property which also comprises:

3.2 Central Library - owned freehold by the Council, and primarily occupied and operated by Greenwich Leisure on a 15-year lease commencing November 2017 and expiring November 2032.

3.3 Ground floor retail units - owned freehold by the Council and held on a long leasehold interest by LCP (for a term of 99 years from June 1975, expiring June 2074) who sublet to the various commercial occupiers.

3.4 The building that Churchill Theatre and Central Library occupy was built as one with construction commencing in 1970 and the theatre formally opening in 1977. It is also physically attached to the neighbouring property to the North which is occupied by Lidl on the ground floor and which has planning permission for conversion of the upper floors into residential apartments.

3.5 The indicative aerial shot below has been colour coded to identify the various occupiers of the building, with Churchill Theatre in green to the far left, Central Library in orange in the centre, and the retail units in blue to the far right. It should be noted that the theatre element of the building has a number of basement levels.



Churchill Theatre Lease & Building Condition

3.6 Churchill Theatre is occupied by Trafalgar Group on a lease dated 5th September 2017 which expires on 3rd April 2041.

3.7 The rent payable to the Council is a peppercorn (i.e. nil). The Council, as landlord, is responsible for the main bulk of the repairs and maintenance at the property.

3.8 Buildings of this nature were typically intended to have a lifespan of c. 50 years. As such, the building is now in poor condition, and many elements of the building and building fabric are now considered end of life and beyond economic repair.

3.9 Therefore, continuing with the lease until its natural expiry in 2041 is not considered a viable option, as the extent of the works required to ensure a sustainable future for the building would not be possible whilst the building is occupied and operational. Equally, given the scale of the works required, feasibility studies would also need to ascertain the optimum way forward, for example it may be more cost effective to completely redevelop the site as a whole and introduce additional income producing uses to support the viability of the cultural offering at the site going forwards rather than try and repair within the existing structure.

3.10 As identified above, the building comprises three separate elements; the Theatre, Central Library, and the retail units fronting the High Street which are held on a long leasehold interest by a third party. However, the property was built as one, and therefore investment is required in the whole given the shared building fabric, services, M&E etc. if there is to be a sustainable future for any individual element.

3.11 This poses a further challenge as the retail units are held on a long leasehold interest by a private third party and therefore the Council has no operational control over this element. Equally, options are being considered currently to move the Central Library element of the building as part of the Council's commitment to investing in its statutory and operational estate, to ensure its buildings best meet the modern day needs of service users. This would leave the Council with the freehold interest in a building where no statutory services are being provided and that requires significant capital investment to keep operational.

Council's Intentions / Recommended Option

3.12 As already noted, the condition of the existing building means that continuing with the status quo is not a viable option, and redevelopment is required for the theatre to have a sustainable future.

3.13 A series of meetings have been held since May 2023 and August 2023 (the time of drafting this report) between the Council and Trafalgar Group to explore possible options. Trafalgar Group have assured the Council that they are committed to the Theatre and wish to continue their operations within Bromley Town Centre. The Council are equally supportive of the Theatre and believe it to be an important contributor to the economic and cultural offering of the Town Centre.

3.14 It is therefore the intention of the Council to enter into formal negotiations with Trafalgar Group to gift the site to them, with a reverse premium to be paid to Trafalgar Group by the Council. This would enable the tenant to viably take ownership of the site and make the necessary investment to ensure a sustainable future for the Theatre at this site.

3.15 The intention would be for the Council to transfer the freehold interest in the whole building, not only the Theatre's existing demise, and this is due to the intrinsic nature of the building fabric which was built as one with shared services etc. and which therefore cannot be redeveloped in part.

3.16 The existing Central Library which forms part of the existing building would therefore need to be relocated within the Town Centre to enable this, which is part of a separate and already ongoing workstream which will be reported on separately in due course. The benefit of the Central Library being relocated and the whole site being gifted to Trafalgar Group is that it would enable expansion of the existing theatre offering, and/or the creation of additional income producing uses to support the investment required in the building as a whole within the existing footprint of the building.

3.17 Whilst discussions are still in their infancy and a transaction of this nature would require significant due diligence on both parts to legally execute such an arrangement, it should be noted that such a transaction would include mechanisms to ensure that a Theatre remains operational on the site going forwards (not withstanding that a period of closure to enable the construction works to take place would be required).

3.19 Discussions with Trafalgar Group have so far been positive, and the tenant has confirmed that they have instructed professional advisors to enable these discussions to progress.

Other Options Considered & Discounted

3.20 Continue 'as is' / 'do nothing' – A 'do nothing' approach would mean continuing with the Theatre in situ under the terms of the existing lease which does not expire until 2041. In this instance the Council is under a legal obligation to meet its obligations with regards to repairs and maintenance and this poses a significant challenge both financially but also practically. It is recognised that the building is end of life and meeting these obligations would require significant unbudgeted capital investment and the scale of works required mean it would not be possible to undertake with a tenant in situ and a theatre and library continuing to operate from the building.

3.21 A 'do nothing' approach has therefore been discounted.

3.22 Council led redevelopment of new theatre– The Council could trigger the landlord break notice effective April 2026 for the purposes of self-redevelopment of a new theatre as part of a wider mixed-use scheme. This would minimise the risk exposure to the Council of continuing with the obligations under the existing lease and the new theatre could be let on commercial lease terms to generate an income.

3.23 However, given financial pressures that all Local Authorities are currently facing, a decision was taken following the Operational Property Review (OPR) which was reported to the Executive Committee in November 2022, and Full Council in December 2022, to invest in the Council's operational estate with funds being directed towards buildings that deliver statutory services, whilst simultaneously taking steps to divest the Council of ongoing maintenance liabilities at properties occupied by commercial tenants and/or those that are delivering non-statutory services to ensure a sustainable future for the Council's operational estate.

3.24 The cost of developing out such a scheme would not be financially viable for the Council and if it were to operate at a loss then there would be issues with regards to State Aid / Subsidy Control to consider by utilising public resources to subsidise a private profit-making entity.

3.25 The Council is ultimately not a developer and there is significant risk exposure to pursuing commercial developments of this nature (i.e. developments that fall outside of the Council's remit to provide operational and statutory services such as affordable housing), as has been evidenced in costs of similar schemes spiralling in neighbouring Boroughs, which in some instances have contributed to bankruptcy.

3.26 This option has therefore been discounted.

3.27 Council led redevelopment of Housing (or other non-theatre) Scheme - The Council could trigger the landlord break notice effective April 2026 for the purposes of self-redevelopment to provide residential accommodation (or other non-theatre development). This would minimise the risk exposure to the Council of continuing with the obligations under the existing lease and could provide much needed affordable housing in the town centre.

3.28 However, the Council recognises that the theatre is a well-utilised and well-loved asset that contributes to the financial and cultural wellbeing of the Town Centre. This approach is also supported by planning policy that seeks to retain and protect cultural and community amenities such as theatres from redevelopment for other purposes.

3.29 In addition to the above, it should be noted that this site wouldn't be considered an optimal site for the direct delivery of affordable housing given the viability of developing on a complex site with limited access i.e. the same level of investment at other Council owned sites would deliver far more affordable homes than here, and therefore pursuing a self-delivery affordable housing scheme on this site given that resources are limited would not be considered the optimum route to self-delivering affordable houses.

3.30 For both these reasons, this option has therefore been discounted.

3.31 Site Disposal – The Council could market its freehold interest in the site. This would minimise the risk exposure to the Council of continuing with the obligations under the existing lease.

3.32 However, with the existing lease to Trafalgar Group still in place, this would limit the pool of buyers significantly and the Council would lose any control it currently has over seeking to find a sustainable future for the Theatre.

3.33 It is therefore considered that the benefits of this option are less than the recommended option of seeking to negotiate a deal with the existing tenant to gift them the site and protect the future use of the site as a theatre.

3.34 If following further discussions, Trafalgar Group is not able / willing to take gifted ownership of the site, then the Council would need to consider marketing a long leasehold interest in the site to enable a private developer to take on the redevelopment under a Development Agreement that ensures the Council retains some control/influence over what development is brought forward on the site. Vacant possession would be required for this route to be possible.

3.35 Landlord Break Option

3.36 As detailed within this report, the existing arrangement is not sustainable, and therefore the existing lease arrangement with Trafalgar Group needs to be terminated to enable the works required on the building to be undertaken to support a sustainable future for the site.

3.37 There is a landlord break clause that requires not less than 24 months' notice to be served on the tenant, to trigger any of the following break dates:

- 2nd April 2026
- 2nd April 2031
- 2nd April 2036

3.38 Therefore, the earliest the Council can contractually end the lease would be 2nd April 2026, and that would require the Council to have provided the tenant with notice no later than 1st April 2024.

3.39 This paper is therefore being brought before Members now to enable the upcoming break notice to be triggered, and to seek authority to enter into formal negotiations with the existing tenant, Trafalgar Group, to secure a sustainable future for the Theatre. The intention of these negotiations being to formalise terms whereby the Council gifts its freehold interest in the site to the tenant, and pays a reverse premium to the tenant, to make this a viable proposition and to ensure the protection of the site for use as a Theatre into the future.

3.40 If following these discussions Trafalgar Group are unable or unwilling to take on the site and a positive conclusion is not reached, then the Council would need to openly market the site for redevelopment purposes to seek a private developer able to deliver a sustainable future for the site instead. To meet the requirements of the landlord break clause legal advice has been sought that confirms the Council in this instance should retain the freehold interest of the site and seek to enter into a Development Agreement with said developer to enable control over the development proposal to be delivered. A 999-year leasehold interest would then only be granted on completion of the agreed development.

3.41 It is important to note that the Council must trigger its landlord break notice in any scenario i.e. regardless of whether the discussion to gift the site to Trafalgar Group are successful or whether Trafalgar Group decide they are unwilling/unable to take gifted ownership of the site to ensure the Council's position is protected.

3.42 As the break notice requires no less than 24 months' notice to be provided, the earliest the break date would take effect would be 2nd April 2026. This therefore provides a long lead in period for the specific terms of the gifting of the site and the reverse premium to be negotiated, agreed and executed by the Council and Trafalgar Group. Although every effort would of course be made to conclude these discussion as expediently as possible to minimise business interruption to the Theatre and crystallise the future security of the site, it is worth emphasising that triggering the landlord's break notice does not result in such a transaction needing to have completed by the date the break clause is triggered, as the tenant will continue to occupy and operate the theatre until April 2026 in any scenario (either under their existing lease, or as the freehold owners, in which case their lease would fall away and be superseded by the now tenants freehold ownership).

3.43 However, the element that is important to have concluded by the end of 2023, is confirmation from Trafalgar Group as to their intentions with regards to taking gifted ownership and the reverse premium to be offered. This is time sensitive as if Trafalgar Group confirm that they are unwilling or unable to pursue this route, then the Council must have alternative development proposals in process for the landlord break notice to be legally triggered. Trafalgar Group have confirmed to the Council that they understand the importance of this timeline and have confirmed that they are able to, and actively are, working towards these timescales in the knowledge that a delay would result in the Council having to openly market the site to protect its position with regards to the landlord break.

3.44 It is not recommended that the Council delays action by looking to trigger any of the later break options as significant investment is required in the building in the short term, and under the existing lease arrangement the Council is responsible for much of this investment. Therefore, there is significant financial and legal risk to the Council of delaying action with the likelihood of the Council being unable to meet its obligations under the lease

(as the extent of works required cannot be carried out whilst the building is tenanted) between now and the second and third break options being extremely high.

Summary of Recommendations

3.45 The condition of the existing building means that continuing with the status quo is not a viable option, and redevelopment is required for the theatre to have a sustainable future.

3.46 The recommendation is that the Council seeks to agree terms with the existing tenant, Trafalgar Group, to gift the Council's freehold interest in the whole site alongside negotiating a reverse premium to be paid to Trafalgar Group. This divests the Council of its liabilities under the existing lease and would enable the tenant to viably invest in the building to ensure a sustainable future for a Theatre on the site which would be a legal requirement of any such transaction taking place (with any other supporting uses as they see fit to support the viability of the proposal).

3.47 In order to facilitate this and protect the Council's position, the Council must trigger its landlord break clause on or before 1st April 2024 in line with the provisions set out within the existing lease, thereby terminating the existing lease arrangement as of 2nd April 2026.

3.48 Should Trafalgar Group confirm they are unwilling or unable to take gifted ownership (and a reverse premium) of the site, then it is recommended that the Council openly markets a 999 year leasehold interest in the site to secure a private developer to undertake the required redevelopment under a Development Agreement, with the lease only being granted with vacant possession on completion of the agreed scheme as set out within the Development Agreement.

3.49 Whilst not the preferred option, it is critical that a plan B is committed to as at this stage, to protect the Council's ability to trigger its landlord break notice should Trafalgar Group not wish or not be able to take gifted ownership of the site which can only be done for redevelopment purposes.

4 IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 N/A

5 POLICY IMPLICATIONS

5.1 N/A

6 FINANCIAL IMPLICATIONS

6.1 Included within Part 2 of this report.

7 LEGAL IMPLICATIONS

The following provisions should be considered in respect of the proposed disposal of the Churchill Theatre.

7.1 s.111 Local Government Act 1972

- The Council has power to do anything calculated to facilitate or is conducive or incidental to the discharge of any of its functions.
- The intended proposal to dispose in this report would be effected pursuant to that statutory power as well as pursuant to the Localism Act 2011, the General Power of Competence.

7.2 Section 123 of The Local Government Act 1972

- 7.2.1 If the intended proposal to dispose were to proceed, Local authorities have the power under s.123 of the Local Government Act 1972 to dispose of land for the best consideration that can reasonably be obtained (usually based on open market value).
- 7.2.2 s.123 of the Local Government Act 1972 confers power to the Secretary of State to give general consent for the purposes of land disposals by local authorities carried out under their powers in Part 7 of the 1972 Act.
- 7.2.3 The Local Government Act 1972, General Disposal Consent 2003 removes the requirement for authorities to seek specific consent from the Secretary of State for any disposal of land where the local authority considers that the purpose for which the land is to be disposed is likely to contribute to the achievement of any one or more of the well-being criteria in the Local Government Act 2000:
- a) the promotion or improvement of economic well-being;
 - b) the promotion or improvement of social well-being;
 - c) the promotion or improvement of environmental well-being; and the “undervalue” (i.e. the difference between the unrestricted value of the interest to be disposed of and the consideration accepted) is £2,000,000 or less.
- 7.2.4 Applications for specific consent should be sent to the Secretary of State and include the following information:
- a) Written description of the land and buildings, the location;
 - b) Written description of how the land is currently held by the Council;
 - c) Details of any leases, encumbrances such as easements;
 - d) Summary of the proposed disposal/transaction.

7.3 Disposal of Land considered as Open Space

If there is any open space within the demise of any proposed disposal Section 123 (2A) will come into play and this states that any disposal of land considered as open space (any land, enclosed or not, on which there are no buildings, and the whole of the remainder of which is laid out as a garden or is used for recreation purposes or lies waste and unoccupied) requires the local authority to give notice of its intention to dispose of the land for two consecutive weeks in a newspaper circulating in the area in which the land is situated, and they must consider any objections to the proposed disposal which may be made to them.

7.4 The Mechanism of the Break Clause in the Relevant Lease

Clause 6.5 of the Relevant Lease provides for the relevant Landlord's Break Right in the following terms:

If the Landlord shall at any time during the Term require possession of the Theatre for the purpose of redevelopment of the same or the Building it may give to the Tenant not less than twenty four months' notice in writing to expire on 2 April 2026 or 2 April 2031 or 2 April 2036 and on expiry of such notice the Lease shall terminate but without prejudice to the rights and remedies of either party in respect of any antecedent claim or breach of covenant.

7.5 In order to be valid, the exercise of the Break Right:

- 7.5.1 Must be strictly in accordance with its provisions;

- 7.5.2 Is subject to the satisfaction of any conditions impose by the Break Right
- 7.5.3 And any conditions to which the exercise of the Break Right is subject must be satisfied at any material time or times.
- 7.6 The principal/ only condition to which the Break Right is subject is that during the term, the Landlord shall require possession of the Theatre or the Building for the purpose of redevelopment. That is not the same as a landlord forming an “intention” for the purpose of s.30(1)(f) the Landlord and Tenant Act 1954.
- 7.7 The clause stipulates essentially that the Landlord comes to the view that it requires possession for the purpose of a redevelopment. In order to determine whether or not possession is required, the Council would first need to formulate potential scheme(s) of development – without doing so, it would not be in a position to determine whether or not it needed possession to carry it out.
- 7.8 The dictionary definition of “redevelopment” is different being: “the act or process of changing an area by constructing new buildings, typically following a demolition”. Consequently, although a substantial refurbishment of the Theatre might constitute substantial works of construction for the purposes of s.30(1)(f) LTA 1954, it would probably not be “redevelopment” for the purpose of Clause 6.5 of the Lease.
- 7.9 Prima facie in clause 6.5 of the Relevant Lease the condition is triggered when the Landlord at any time takes the view that possession is required. However, it is likely to be the case that it would be implied that:
- 7.9.1 The decision to carry out the redevelopment (which requires possession) is a bona fide one;
- 7.9.2 The Landlord is required to remain resolved to carry out redevelopment at the time of the service of the notice;
- 7.9.3 The Landlord is required to remain resolved to carry out the redevelopment at the effective date of the break.
- 7.10 Because Clause 6.5 of the Relevant Lease refers to “redevelopment” in a general sense, it is not necessary that the Landlord has settled on one particular redevelopment, as long as all options under consideration on both occasions identified above (i) constitute a redevelopment (as defined above) and (ii) all such options would require possession (as defined above) to have been obtained. If an option under consideration was “to do nothing”, then the validating intention would not be present.
- 7.11 It is only necessary for redevelopment to necessitate possession of the Theatre or Building – a wider redevelopment that incorporates one or both would equally be a qualifying redevelopment.
- 7.12 The necessary minimum steps are: the working out of scheme(s) of development; (all of which) require possession and which the Council subjectively has the intention of implementing on the date of the service of the notice and on the date that it takes effect; and
- 7.13 Clause 6.5 must be construed by reference to the usual principles of contractual interpretation, so that case-law on the construction of s.30(1)(f) of the Landlord and Tenant Act 1954 is of no direct relevance, i.e. (i) the treatment of the requirement of possession is likely to be treated as equivalent (ii) most, but probably not all, of the elements of s.30(1)(f) would be treated as constituting “redevelopment.”

7.14 Accordingly, the terms of the break right would not be satisfied if the Council was planning to sell - possession would be required for sale not redevelopment in those circumstances.

7.15 However, as long as the Council retained the freehold, there is no difficulty if the option adopted was the grant of a building lease/ agreement for lease granted for a premium (and possibly a ground rent), the exact terms of which (including the specification of the redevelopment) would need to be negotiated with a would- be developer.

8 PROCUREMENT IMPLICATIONS

8.1 The Public Contracts Regulations 2015 set out several exemptions to the relevant procurement regulations. In this case, Clause 10 (1) (a) applies in which the regulations do not apply to 'acquisition...of land, existing buildings...or which concern interests in or rights over any of them'.

8.2 Therefore, it is presumed that there are no procurement implications relevant to this report, subject to legal advice that the process for lease arrangements and/or marketing and disposal is in compliance with the exemptions within the Regulations.

Non-Applicable Sections:	HR and Procurement
Background Documents: (Access via Contact Officer)	

Report No.
HPR2023/056

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

Date: Wednesday 18 October 2023

Decision Type: Non-Urgent Executive Key

Title: RELOCATION OF CENTRAL LIBRARY

Contact Officer: Lydia Lee, Assistant Director Culture and Regeneration
Tel: 020 8313 4456 E-mail: lydia.lee@bromley.gov.uk

Chief Officer: Director of Housing, Planning, Property and Regeneration

Ward: Bromley Town;

1. Reason for decision/report and options

1.1 Due to the Churchill Theatre tower building being at end of life, with a requirement for redevelopment, officers have considered options for the relocation of Central Library.

1.2 This report sets out the recommended option to move the service to the old Topshop site and seeks budget approval to proceed to RIBA stage 3.

2. **RECOMMENDATION(S)**

That the Renewal, Recreation and Housing PDS Committee:

2.1 Notes the contents of the report and makes any comments available to the Executive.

That the Council's Executive:

2.2 Note the works carried out for RIBA 1 that identify that the Topshop site is a suitable location for the Central Library. Note that the indicative budget for relocation of the Central Library has an estimated cost of circa £15.5m, this is subject to further works being carried out for RIBA 2-4. Detailed costings will be provided in a Further Report to the Executive.

2.3 Approve, in principle as set out in paragraphs 3.10 – 3.13, proceeding to procurement for a multi-disciplinary design team to RIBA Stage 7, with a break clause after RIBA Stage 3 and 4. The estimated whole life value of the contract up to RIBA Stage 7 is £1m with an estimated value up to RIBA Stage 3-4. . Approve adding £500k for these works to the Capital Programme in preparation of a further detailed costing report.

- 2.4 Delegate authority to the Director of Housing, Planning, Property and Regeneration, in Agreement with the Assistant Director Governance & Contracts, the Director of Corporate Services the Director of Finance and the Portfolio Holder, to Approve the detailed procurement strategy for the procurement of multi-disciplinary consultancy services to RIBA 7, including ensuring suitable break clauses are applied to the contract.
- 2.5 Delegate any legal matters arising from these recommendations to the Director of Corporate Services.

Impact on Vulnerable Adults and Children

1. Summary of Impact: An equality impact assessment will be undertaken to ensure no negative impacts. It is expected that the relocation will have a positive impact through the provision of new facilities in a more visible location.
-

Transformation Policy

1. Policy Status: Existing Policy
 2. Making Bromley Even Better Priority (*delete as appropriate*):
 - (1) For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: Estimated Cost £15.5m with initial request for £500k
 2. Ongoing costs: Non-Recurring Cost
 3. Budget head/performance centre: Churchill Theatre OPR Budget
 4. Total current budget for this head: £0
 5. Source of funding:
-

Personnel

1. Number of staff (*current and additional*): current 2 , additional 0
 2. If from existing staff resources, number of staff hours: current 21.6 per week, additional 7.2
-

Legal

1. Legal Requirement: Statutory Requirement
 2. Call-in: Not Applicable:
-

Procurement

1. Summary of Procurement Implications: The multi-disciplinary consultancy procurement process is an above threshold due to the classification of the services contract and its estimated value. The proposed detail and procurement route will be set out and approved in a Gateway Report before commencement.
-

Property

1. Summary of Property Implications: The property has been vacant since November 2020. Advice on best value for 7+ term leases of future tenants will be sought from the Estates Team.
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: will be considered throughout the duration of the project, including within contracts and where possible within repairs to existing buildings.
-

Impact on the Local Economy

1. Summary of Local Economy Implications: Benefits to Bromley Town Centre include, increased footfall, support of night-time economy, encourage further commercial investment, improve accessibility, and encourage users to shop in Bromley.
-

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*): The busiest Library in the Borough; in 2022/23 the library received 355,512 visits, issued a total of 242,213 books and multimedia items and registered 17,208 new users
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: Ward Councillors welcome the Topshop proposals and support the scheme subject to the detail.

3. COMMENTARY

- 3.1 As part of the Council's Operational Property Review, led by the Property division in November 2022, a review of all Council properties has been undertaken. This review included the Churchill Theatre and Central Library building and concluded that the condition is poor. The building is at the end of its life and the site now requires redevelopment. Consequently, officers have been considering options for the relocation of Central Library.
- 3.2 Central Library is the largest library in Bromley. It is used extensively by a range of residents of all ages, from students studying for exams, to older people attending reading groups. It is the borough's primary library and in 2022/23 issued 242,213 books and multimedia items, and received 355,512 visits. In 2022/23 Central Library registered 17,208 new users.
- 3.3 Central Library hosts a broader range of services than the other 13 libraries in the borough, including Local Studies and business start-up space. There are also community hire hall spaces, exhibition spaces, a book stack and an archive storeroom. Therefore a large town centre premises is required if the library is to be relocated.
- 3.4 Two buildings were initially identified as potentially suitable to host Central Library. The first was Churchill Quarter building three, and the second was the old Topshop site on the High Street.
- 3.5 Churchill Quarter building three is a large space opposite Bromley South Station. The site is larger than required and could host all the existing library front facing and back office storage and services, as well as the museum and art store currently located in Orpington at the Priory depot site. However, its location at the far end of the high street is not ideal, given that it is further away from the main public car parks and other amenities. Additionally, the only way of creating public access to this building is to create a new opening down the side of the building past Wetherspoons, this is away from the main street and would reduce the visibility of the library, as well as causing issues for evening events at the library.
- 3.6 The Topshop building is also a large space, in the centre of the pedestrianised area of Bromley High Street and very close to the current library site. It is slightly smaller than the current site and would not have space to replicate all the current storage provision, specifically the archive store. However it would be able to host all the customer facing services including exhibition space. Additionally it has a very strong visible frontage that could be greatly improved, creating a very accessible site, and the potential (subject to floor levels and appetite from the owners of the Glades) to connect on the first floor into the shopping centre to provide dual access.
- 3.7 Therefore, the Topshop site is considered the preferable location at this stage, with a suitable space needed to be found for the archive store. The archive store requires a specialist space that is protected from fire and is environmentally controlled to ensure that the documents are not damaged by humidity. Ideally if the archive store is moved the opportunity would also be taken to move the museum and art store to the same site. The site should ideally be in or close to Bromley Town Centre. This would create easier access to the whole of the Bromley Historic Collection together and enable easier management. Currently residents who want to access items from the archive and museum collection have to wait for items to be retrieved so there would be no change to this system as long as a site is found close to the town centre.

- 3.8 The Topshop site would need fully stripping out. The site is known to have asbestos which needs removing and the floors will require strengthening to carry the book load. Daylight and ventilation would also need to be improved, and the space would need to be fully fitted out to deliver a high quality main library service with all the facilities currently on offer, including local studies, computer space, business and work space, exhibition space, staff offices, a special children's library, and staff offices and amenities. In addition it is considered important that any new library includes fit for purpose public toilet provision. The high-level estimated cost of moving the library to Topshop, as well as providing an additional suitable storage facility, is £15.5m; however this needs to be confirmed by undertaking detailed work.
- 3.9 To understand the full viability of the Topshop site, and to inform the design of a new library development, officers will need to undertake data research, surveys with users and non-users, discussions with key stakeholders, and appoint a multidisciplinary team to progress surveys and design work to RIBA Stage 3.
- 3.10 Therefore this report requests approval to go out to tender for a multi-disciplinary team to deliver the project. Procurement of a multi-disciplinary consultancy provider for design and technical services is required to progress the scheme through to RIBA Stage 7, at an estimated overall value of £1m. It should be noted that this estimated value is based on all RIBA stages being completed, but the contract will be constructed with suitable break clauses at each relevant RIBA stage should the project not progress at any stage for any reason. It is estimated that taking the project to RIBA Stage 3 will be £400k.
- 3.11 The break clauses will be applied as required to enable the Council to terminate the contract should budget not be available, the scheme isn't considered financially viable or if the Council wishes to retender the service. The continuation of the scheme past RIBA 3 will be dependent on a financial viability assessment, and a report will be taken to Executive to provide an update on the scheme before it is progressed post planning.
- 3.12 It is proposed to utilise a compliant procurement route, either through a framework or via a suitable tender process. The full details of the proposed procurement strategy are to be developed further and delegated authority, in agreement with the Portfolio Holder and relevant Officers, is sought for approval of the detailed procurement approach.
- 3.13 It is anticipated that the procurement timetable will be:

Milestone	Date
Tender issued	End of November 2023
Tender returns	January 2024
Appointment commencement	Early March 2024

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 An equality impact assessment will be undertaken to review any impact of the potential move from the existing premises to the old Topshop site.
- 4.2 The Topshop site is expected to be large enough to include all existing services and therefore there is not expected to be any negative impact. The Topshop site is more visible and the refurbishment will provide an opportunity to create better modern facilities at the borough's key library site.

5. TRANSFORMATION/POLICY IMPLICATIONS

- 5.1 The Council is currently investing significantly in library buildings across the borough. Libraries are a statutory service and are used by a range of residents. They are important community spaces.
- 5.2 The relocation of Central Library creates an opportunity for an improved service with modern facilities that meet the needs of a range of users.

6. FINANCIAL IMPLICATIONS

- 6.1 The paper is requesting at this stage for £500k to be allocated from the Churchill Theatre's OPR budget to carry out RIBA stage 3 works to determine the full cost of the Central Library move to its new location, its fit out and refurbishment works.
- 6.2 It should be noted that the full RIBA cost to stage 7 is estimated at £1m, but this will be fully determined after RIBA stage 3/4 works are complete, a break clause is included to ensure there is no commitment beyond RIBA stage 3/4, agreement to spend beyond this will need to be requested again in a future paper to Executive.
- 6.3 There is currently an estimated to cost in the region of £15.5m plus the RIBA stage 7 costs of circa £1m as outlined above to fully relocate the library, members are asked to note this but a further paper will come to Executive and Full Council outlining these costs in further detail and requesting the required funding.
- 6.4 It should be noted that if for any reason the project does not progress then all costs borne to that point would have to be funded out of revenue budget as it can no longer be paid for out of the OPR Capital budget as it would not be considered as an ongoing capital works programme.

7. LEGAL IMPLICATIONS

- 7.1 The Council has a statutory duty under Section 7 of the Public Libraries and Museums Act, 1964 to deliver a comprehensive and efficient library service to those who wish to use it. This duty must be complied with alongside the Council's other statutory duty set out below. In fulfilling its duty, a local authority must have regard to the desirability of:

- ensuring that facilities are available for the borrowing of and reference to books and other printed material and pictures and film to meet the general and special requirements adults and children;
- encouraging adults and children to make full use of the library service and of providing advice as to its use and information as may be required by users of the service;

- 7.2 Whilst this report is not seeking approvals for the Library relocation, subsequent reports in seeking this would need to consider the following:

The Secretary of State for Digital, Culture, Media and Sport (DCMS) has a duty under the Public Libraries and Museums Act 1964 to:

- (a) superintend and promote the improvement of the public library service provided by councils in England
- (b) secure the proper discharge by councils of their functions as library authorities

7.2.2 The Council is required to provide DCMS with such information as the Secretary of State may require for carrying out their duties. DCMS latest guidance requires councils considering

changing their library service to inform the DCMS Libraries team about their proposals before public engagement or consultation.

- 7.3 With reference to paragraph 4 of this report, the Council must comply with the public sector equality duty (PSED) under section 149 of the Equality Act 2010. The duty is to have regard to the need to (a) eliminate unlawful discrimination; and (b) advance equality of opportunity; and (c) foster good relations, between people with protected characteristics and those without it. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It is not a duty to achieve any of these, it means the Council must have a "focussed awareness" and ensuring possible indirectly discriminatory effects of a decision are considered in the decision-making process.
- 7.4 Consideration and review of the council's title to the relocation site be undertaken to ensure there are no impediments and references to the former letting is removed.
- 7.5 The proposed contract is for a multi-disciplinary design team to RIBA Stage 7 with a break clause at RIBA Stage 3 with an initial estimated cost for those consultancy fees and surveys to RIBA Stage 3 being £400k. As this is an "above financial threshold" public services contract as defined by the Public Contract Regulations 2015 (the "Regulations") then this procurement must be conducted in full compliance with those Regulations.
- 7.6 The procurement implications together with compliance with the Council's Contract Procedure Rules (CPR's) are as explained below.
- 7.7 Officers should instruct Legal Services to assist them in collating the contractual documentation necessary for the tender should Members approve this procurement.

8. PROCUREMENT IMPLICATIONS

- 8.1 The decision sought is approval in principle to proceed to procure multi-disciplinary consultancy services up to RIBA Stage 7 at an estimated whole life value of £1m via a compliant framework or tender route. It notes that the contract will be constructed with suitable break clauses at relevant stages such as RIBA 3 should the scheme not progress. The estimated value up to RIBA 3 is £400k which is within the initial budget allocation sought. Delegated authority is sought to the relevant Chief Officer to approve the detail of the procurement strategy, subject to agreement from the relevant Officers and Portfolio Holder.
- 8.2 Due to the estimated contract value and the classification of the contract as a services contract, the procurement process shall comply with the Public Contracts Regulations 2015 for an above threshold procurement process.
- 8.3 The Council's specific requirements for authorising proceeding to procurement are covered in 1.3 of the Contract Procedure Rules with the need to obtain Approval from the Executive with the formal Agreement of the Chief Officer, Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance for a procurement of this value. In accordance with CPR 2.1.2, Officers must take all necessary professional advice.
- 8.4 In compliance with the Council's Contract Procedure Rules (Rule 3.6.1), this procurement must be carried out using the Council's e-procurement system.
- 8.5 Under the delegated authority sought, a Gateway Officer report should be completed in consultation with the Corporate Procurement Team, Finance & Legal to set out the detail and proposed route for this procurement once it is known with the relevant Officer and

Portfolio Holder approval and agreement before commencement.

9. PROPERTY IMPLICATIONS

- 9.1 The former Topshop site is owned under LBB's Investment Fund and was acquired under Phase 1 of the acquisition programme on 9th September 2014. Since the administration of Arcadia Group, including Topshop which traded from this location, in November 2020, the property has been vacant.
- 9.2 If in the future, a future tenant is to occupy and operate the Central Library then following completion of the works on a commercial basis including on FRI lease terms and paying a commercial rent. The Council's Estates Team will need to be instructed in this regard to appoint suitable advisors to secure a future tenant at the appropriate point to ensure that the Council meets its statutory obligations with regards to Section 123 of the Local Government Act 1972 regarding best value which is relevant to all leases with a term of 7+ years.
- 9.3 Further comments are provided in Part 2

10. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 10.1 The libraries are the borough's most important social infrastructure; consideration to the successful relocation of its largest library is important to meeting the needs of Bromley's communities.
- 10.2 Carbon Reduction and Social Value will be considered throughout the duration of the project, including the tender of the multi-disciplinary contract via the inclusion of necessary quality criteria to ensure that Carbon Reduction and Social Value has been considered.
- 10.3 Wherever possible repairs to the existing buildings, and new items within, will be made that reduce energy consumption, for example through the replacement of boilers and related infrastructure.

11. IMPACT ON THE LOCAL ECONOMY

- 11.1 The refurbishment of the Topshop site could have a significant impact on the local economy. The site has been empty for several years and its large frontage blights this section of the pedestrianised area.
- 11.2 Investing in the old Topshop unit and creating a new modern library will increase footfall in Bromley Town Centre and encourage further commercial investment. If an agreement can be made with the Glades to create an access from within the shopping centre this will also improve the accessibility of the town centre and encourage users to shop in Bromley.
- 11.3 There will also be benefits to enlivening the pedestrianised area in the evening, with improved safety and supporting the night time economy by creating a flexible library space that can host evening cultural programming as has been piloted recently through the NTEZ BR1 Lates series.

12. CUSTOMER IMPACT

- 12.1. There are 31,224 registered users who have used their library card to borrow an item in a library branch in 2022 representing 9.5% of the population of Bromley. This does not include customers who used the library solely for purposes such as studying, activities or using public PCs

- 12.2. Bromley Central Library is the busiest Library in the Borough receiving 355,512 visits in 2022/23. Central Library issued a total of 242,213 books and multimedia items in 2022/23 and in the same year registered 17,208 new users

Non-Applicable Headings:	Personnel implications; Impact on health and wellbeing
Background Documents: (Access via Contact Officer)	

Report No.
HPR2023/054

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

18th October 2023

Date: For Pre-Decision Scrutiny by the Renewal, Recreation and Housing Policy, Development and Scrutiny Committee together with the Executive, Resources and Contracts Policy Development and Scrutiny Committee on Tuesday 17 October 2023

Decision Type: Non-Urgent Executive Key

Title: LEISURE CENTRE MAJOR WORKS PROGRAMME

Contact Officer: Max Graham, Regeneration Project Manager, 0208 4617216
Email: max.graham@bromley.gov.uk

Alicia Munday, Head of Regeneration, 0208 3134559
Email: alicia.munday@bromley.gov.uk

Chief Officer: Director of Housing, Planning, Property and Regeneration

Ward: Orpington; West Wickham;

1. Reason for decision/report and options

- 1.1 Following Executive's approval of the Procurement Strategy for the Leisure Centre Major Work Programme (report no: HPR2023/044) in August 2023, which was subject to this report, Executive are now asked to consider the options and recommendations contained within this report in order to bring forward the major works required at the Walnuts and West Wickham Leisure Centres.

2. **RECOMMENDATION(S)**

The Renewal, Recreation and Housing PDS, together with the Executive and Executive, Resources and Contracts PDS is asked to note the contents of this report and make any comments available to the Council's Executive.

Executive and Full Council are asked to:

General Recommendations:

- 2.1. Delegate authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to put in place arrangements for the future tenant of the facilities pending Member's decision on this matter in the Part 2 report.
- 2.2. Subject to 2.1 being approved, approve the capital budget as set in the Part 2 report.
- 2.3. Approve Option 3 of the Programme Options, outlined in 3.24, which, pending final approval of budgets in Spring 2024, will allow for all works to be complete by Spring 2026.
- 2.4. Delegate authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to approve the submission of grant funding applications and to accept any subsequent awards of funding in relation to both Leisure Centres.
- 2.5. Delegate authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to approve any reasonable changes to the works needed after Executive approval in order to keep the works within budget.
- 2.6. Note that additional funding may be needed for the construction works, as per 3.6.1 of the Part 2 report, above the OPR's indicative budget of £27.1m, to deliver the core requirements identified in 3.14 and 3.16 of this report and indicatively costed in 3.8 and 3.12 of the Part 2 report.
- 2.7. Approve £1.867m from the OPR's budget for Leisure Centre Works to fund RIBA 3/4 works for both leisure centres (as set out in 2.10 and 2.14).
- 2.8. Approve £150k from the OPR's budget for Leisure Centre Works, to fund any ancillary legal matters arising from the developments up to RIBA 4.

West Wickham:

- 2.9. Approve the core requirements for West Wickham Leisure Centre as set out in 3.14 of this report so that officers can progress these plans through RIBA 3 and 4.
- 2.10. Approve the award of contract to Alliance Leisure Services for £1.047m, funded by the OPR's indicative budget for leisure centres, to progress the West Wickham Leisure Centre Major Works Programme to RIBA 4 based on the core requirements laid out in this report.
- 2.11. Note that the current estimate for the works contract for West Wickham Leisure Centre, beyond RIBA stage 4, is contained in the Part 2 report. Following conclusion of RIBA stage 3, a subsequent report will be brought forward detailing more accurate costs for the works.
- 2.12. Delegate authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to resolve any ancillary legal matters at West Wickham arising from the developments up to RIBA stage 4.

The Walnuts:

- 2.13. Approve the core requirements for the Walnuts Leisure Centre as set out in 3.16 of this report so that officers can progress these plans through RIBA 3 and 4.
- 2.14. Approve the award of contract to Alliance Leisure Services for £820k, funded by the OPR's indicative budget for leisure centres, to progress the Walnuts Leisure Centre Major Works Programme to RIBA 4 based on the core requirements laid out in this report.

- 2.15. Note that the current estimate for the works contract for the Walnuts Leisure Centre, beyond RIBA stage 4, is contained in the Part 2 report. Following conclusion of RIBA stage 3, a subsequent report will be brought forward detailing more accurate costs for the works.
- 2.16. Delegate authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to resolve any ancillary legal matters at the Walnuts arising from the developments up to RIBA stage 4.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Positive impact on vulnerable adults and children.
-

Transformation Policy

1. Policy Status: Existing Policy
 2. Making Bromley Even Better Priority (*delete as appropriate*):
 - (1) For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
 - (4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
 - (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: £2m
 2. Ongoing costs: Not Applicable: one-off costs.
 3. Budget head/performance centre: OPR Capital Budget
 4. Total current budget for this head: £27.1m
 5. Source of funding: Capital Receipts
-

Personnel

1. Number of staff (*current and additional*): Current staff 1.5
 2. If from existing staff resources, number of staff hours: n/a
-

Legal

1. Legal Requirement: Non-Statutory - Government Guidance
 2. Call-in: Applicable
-

Procurement

1. Summary of Procurement Implications: This report seeks to award a Direct Award contract to Alliance Leisure, for 2 projects relating to West Wickham and The Walnuts Leisure Centres.
-

Property

1. Summary of Property Implications: Coordination with Property team needed with regard to the future lease.
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: Significant benefits following completion of works.
-

Impact on the Local Economy

1. Summary of Local Economy Implications: Investment will have a positive economic impact.
-

Impact on Health and Wellbeing

1. Summary of Health and Wellbeing Implications: short term negative impact, long term positive impact above and beyond what is currently available at the centres.
-

Customer Impact

1. Estimated number of users or customers (*current and projected*): impact on customers mitigated by programme option 3.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: Invited for comments, and any received will be tabled at the committee(s).

3. BACKGROUND

- 3.1. The Walnuts (built 1970) and West Wickham (built 1967) Leisure Centres are amongst the boroughs most used facilities, averaging in excess of c.20,000 visits per month. Leisure centres, although not a statutory service, provide important access to community health and fitness and are a key component of the Council's statutory public health remit. Both facilities are at the end of their natural design life and an Indoor Sports Facilities Needs Assessment for Bromley has identified that retaining both of these facilities is required to meet with demand, particularly in relation to swimming pool provision, therefore the facilities have formed part of the Operational Property Review.
- 3.2. As part of the Council's Operational Property Review, led by the Property division, a review of all Council properties has been undertaken. This review included leisure facilities, and both the Walnuts and West Wickham facilities were identified as requiring significant investment. A provisional sum of £27.1m (plus £500k feasibility funding) was identified for these works (Executive Report Nov 2022 and March 2023). This sum was based on high level appraisals of works needed at both sites in 2020/21 and was calculated before the construction sector experienced high levels of inflation, peaking at 10.4% in May 2022. Given the scale of works required, and likely total replacement of some significant parts of the facilities, this has been managed as a major works programme by the Regeneration team. The remit of the project is to secure the facilities for the future and increase the potential of the facilities to secure a rental yield.
- 3.3. In 2018, leisure centre facilities in Bromley were moved to 40-year leases with Mytime Active. The facilities were grouped into two lots: Group 1 facilities on a Full Repair and Insurance Lease (FRIL) with MyTime Active and Group 2 facilities, on a lease of the same length but with the Council retaining maintenance responsibilities. West Wickham and the Walnuts leisure centres are in the Group 2 leases. Upon completion of the Major Works programme, it is envisaged that both facilities will move to Group 1, where the tenant is responsible for a FRIL lease, as well as a commercial rent paid to the Council on the properties.
- 3.4. In July 2019, Executive (Report DRR19/038) approved £1.5m to replace the Boilers serving the Orpington District Heating System. Due to factors outside of the Council's control this was subsequently amended to works to decentralise the district heating networks into localised plant solutions. The revised proposals were approved by the Portfolio Holder in November 2021. This programme of work is still ongoing and comprises the following works: Orpington Library now has its own Air Source Heat Pump installation, and the Shopping Centre is now disconnected from the system. The Saxon Centre will be provided with its own dedicated boiler plant as part of its forthcoming OPR programme of works. The Walnuts Leisure Centre, as a temporary solution, will be connected to a containerised packaged boiler plant fed from a new dedicated gas supply. Whilst the container boiler is temporary, the gas supply can be utilised to supply the new mechanical installation work planned for during this refurbishment project. Therefore, the major works programme must also manage appropriate plant replacement.

COMMENTARY

- 3.5. To bring forward the Major Works Programme, and given the current identified condition of the centres, plus their importance and value in providing leisure facilities, the Council appointed a specialist leisure services partner (Alliance Leisure Services) via a compliant framework to undertake feasibility works that consider the following:
 - Engagement with residents and stakeholders to discuss their priorities.
 - Facilities modelling – predominantly looking at what facilities are available across the Borough and nearby to ensure we are meeting recommended levels of service.

- Surveys – to review the current state and what is possible on the sites and within the fabric of the existing buildings.
- Sustainability – operational modelling that ensures any investment becomes sustainable and generates a future income.

3.6. Given the public investment being proposed in these facilities, it is important to ensure that the facilities will be utilised to their full potential and meet demand both now and in the future. The plans put forward in this report are informed by users of the centres and the business modelling supported by independent, Sport England-accredited business consultants, Max Associates. To inform this, a significant engagement exercise was undertaken including online surveys for both users and non-users at both centres; focus groups, discussing topics such as accessibility, economic development, youth needs and the views of stakeholders; individual sessions with clubs as well as surveys sent to schools and sport clubs that utilise the centres. It should be noted that the survey was made available in accessible formats and there were representatives on different days in the high streets and in the centres also gathering feedback to ensure residents without digital access were included. There were 6135 responses to the surveys (3436 for The Walnuts and 2699 for West Wickham) and 135 attendees at the focus groups.

3.7. A summary of the results of the survey can be found in Appendix A.

3.8. The second element of work that has been undertaken was to consider the facility mix of the proposed redeveloped centres, investigating whether a reconfigured centre and change in services available would improve the offer for residents and ensure the longevity and commerciality of the centres. The appointed consultants have conducted an opportunity and competitor analysis report which has been taken into consideration in the proposals. A copy of this can be found Appendix C (Part 2 report).

3.9. The third component of works undertaken has been to undertake detailed surveys on the existing facilities, this work is essential to give some cost confidence to the budget. In addition to the Condition and Asbestos surveys already conducted by Property colleagues, the Council commissioned the following surveys and consultants in order to inform the proposals contained within this report:

- Pool Tank survey
- Pool Filtration survey
- Mechanical, Electrical and Plumbing (MEP) Validation survey
- Structural Assessment
- Concrete Survey
- CCTV survey
- Utilities survey
- Measured Building survey
- Topological survey
- M&E Design Services consultant
- Carbon consultant
- RAAC Surveys (due to be conducted as a precautionary measure, scheduled for this autumn).

3.10. The survey results and consultant reports have been reviewed and considered by the Council's specialist delivery partner and, in consultation with council officers, now form part of the recommended proposals within this report.

3.11. The fourth element of the feasibility works has been in relation to sustainability. This strand of work has involved investigating options to decarbonise the facilities wherever possible to

support future tenant operators, as well as consideration of the future tenant operator model for the centres. As a result of this work, grant applications are being submitted to bring forward sustainable green energy on site.

- 3.12. Regeneration officers have liaised with the specialist delivery partner (Alliance Leisure), architects and relevant consultants to provide members with the necessary information in order to make an informed decision on the options below regarding the works required to the centres and the future operator of the centres. Each centre has had a 'Base' option developed. The Base option delivers more than a simple repair programme and is considered the essential works needed to bring the services to a modern standard, providing a service that is sustainable (to avoid additional investment being required in the medium term) and commercial. Delivering below this 'Base' standard is not considered efficient and would not result in the Council being able to secure a Full Repair and Insurance Lease (FRIL) with the Council retaining responsibility for the longer-term repair and maintenance costs. For this reason, this option has not been costed, but is not likely to be significantly less than the base option. Closing facilities or not undertaking any works has not been appraised as this was already considered as part of the OPR process and, given the importance of the centres to the community, their role in meeting leisure demand and the Planning restrictions on the sites, these options were not considered viable.

ALLIANCE LEISURE SERVICES APPOINTMENT

- 3.13. As approved by Executive in August 2023 (Report HPR2023/044), subject to approval of this report, the Council will appoint Alliance Leisure Services under a Development Agreement via the UK Leisure Framework. This is a compliant single supplier framework created by Denbighshire County Council. The UK Leisure Framework, although a single operator framework, is a compliant route to procurement and will allow the Council to benefit from the skills, expertise and extensive network that Alliance Leisure have in the leisure industry. Alliance Leisure would be responsible for contracting all subcontractors and day to day management of the build works, minimising the risk to the Council. Alliance Leisure will work with the Council to ensure that all key project requirements are met within budget.
- 3.13.1. Members should be assured that the framework was procured in a competitive market and best value can be demonstrated through the selection of a team with a relevant track record and by benchmarking the fees against other projects. In addition, the UK Leisure Framework has identified fee parameters which were evaluated by independently appointed cost consultants, advising the framework owner, as part of the submission process. This robust appointment process is why the UK Leisure framework is used by so many local authorities.
- 3.13.2. The Council would appoint Alliance Leisure through the Framework's 'Access Agreement' for Pre-Construction services to the end of RIBA 4, and then to RIBA 7 (through a 'Call Off' contract (Delivery Management Agreement) to deliver the construction works). RIBA Stages 4 onwards are subject to a further Executive Report in Spring 2024 which will confirm budgets.
- 3.13.3. Alliance Leisure will then enter into a JCT (Joint Contracts Tribunal) 2016 Design and Build Contract with the appointed Principal Contractor.
- 3.13.4. The Principal Contractor and Alliance Leisure will be held to account throughout delivery of the project. This will be done through constant review and measurement against agreed cost plans, programme, risk registers and agreed KPIs, to ensure all are on target and any proactive mitigation strategies are put in place if necessary. Monthly Contractor's Reports are presented to aid this process and provide transparency throughout, along with monthly site visits to review works.

WEST WICKHAM LEISURE CENTRE – CORE REQUIREMENTS

3.14. It has become clear from the surveys and works completed to date that West Wickham is in worse condition than the Walnuts and requires a great deal of structural work to the centre. The core works required for this centre, have been costed with this information contained within the Part 2 report.

3.14.1. The core works required for West Wickham leisure centre include:

- Replacement finishes and redecoration to the pool halls.
- New pool roof
- Replacement spectator seating
- New pool lining (tank) for both the main and learner pools
- Drowning detection technology
- A total review of the MEP and Pool Plant.
- New unisex changing village with new lockers and cubicles (as well as a dedicated learner changing room for young people learning to swim).
- New kitchen.
- Upgrade of reception to a combined reception/servery service.
- New Changing Places facility.
- New café.
- New lift.
- New soft play / party zone.
- New spin studio.
- New Innerva studio (for older residents/those recovering from physical injury).
- Upgraded and enlarged fitness suite/gym.
- Upgraded and relocated studio.
- New staff facilities.
- Improved views from the gym into the pool hall.
- New views from the café and Innerva suite into the pool hall.

3.14.2. There would be no change to the building area with all proposed facilities provided within the existing envelope of the building. The existing entrance would be retained but enhanced with new windows.

3.14.3. The female changing facilities would be removed with a unisex changing village (with private cubicles) proposed in the current male changing room (Page 55 of Appendix B). The surface area has been reallocated to create an open plan space with a café positioned centrally and linked to the pool hall, new soft play and spin studio. Accessibility throughout the building has been addressed and a new platform lift is provided to access the first floor, whilst the space beneath the spectator viewing has been reconfigured to provide a studio dedicated for older residents and those recovering from ill health/post-surgery accessed from the café space. A shared reception/servery has been positioned centrally with clear sightlines to maintain access control throughout the building. There is the potential for the café to spill outside and utilise some of the external green space.

3.14.4. The open plan café would be the heart of the redeveloped centre, forming a key part of the customer journey. From the café there is visibility into key areas, such as the main pool hall and soft play, as well as providing access to the changing village, spin and Innerva studios and the first floor.

3.14.5. Innerva suites offer power-assisted exercise equipment which provides a low impact, full-body workout circuit for older adults and those living with long term conditions. An Innerva suite is

safe for all age groups and abilities. Its outward facing layout of the machines facilitate social interaction between users, working to ease loneliness in the older generation. The suite promotes active ageing, helping to combat loss of muscle tissue and enhance balance and flexibility into older age.

3.14.6. The pool halls (main pool and learner pool) will be refurbished along with the dedicated learner change with separate access. The first floor will be accessed from either the existing stairs or new platform lift. A new corridor will provide access to the spectator viewing area which will be refurbished with new seating and finishes. A new larger gym is provided with the existing studio and unused room removed to allow the increase to the gym area. Views into the pool hall from the gym will be maintained to provide good visibility between facilities within the building. A new studio is provided to the other side of the new corridor which avoids users having to walk through the gym as they do currently with the existing arrangement providing better flexibility. Elsewhere on the first-floor new staff facilities and accessible change and toilets are proposed alongside lockers within the corridor and gym space for users.

3.15. Officers have also considered feedback from users, groups and the business modelling for further options that could be provided in the centre but are currently not possible due to financial constraints. These options could be considered by the operator in the future, or if other sources of funding are found.

- Spa facilities.
- Upgraded spin studio to an Immersive spin studio.
- Upgraded studio to a Future studio.
- Splash play facilities.

3.15.1. These works are estimated to cost circa £0.5m. The project team has considered how these facilities could be accommodated within the leisure centre should external funding be available. This can be found on page 33 of Appendix D (Part 2).

THE WALNUTS LEISURE CENTRE – CORE REQUIREMENTS

3.16. The core requirements for the Walnuts Leisure Centre have been costed with this information contained within the Part 2 report.

3.16.1. The core works required to the Walnuts Leisure Centre include:

- A total review of the MEP and Pool Plant.
- Redecorated public corridors.
- Redecoration, including new cubicles and flooring, to the ground floor dry changes.
- New Changing Places facility.
- Upgraded ventilation for the sports hall.
- Replacement flooring, ceilings and redecoration to the wet changes.
- New cubicles and lockers to the wet changes.
- Replacement flooring and new seating to spectator areas.
- New pool lining (tank) to both pools.
- Drowning detection technology.
- Replacement flooring and redecoration to reception/café area.
- New Innerva studio (for older residents/those recovering from physical injury – replacing the Creche).
- New adventure-play with digital/gamified features.
- New flooring and redecoration to soft play area.

- New accessible toilets on the first floor.
- Redecoration to first floor studio.
- New and expanded gym (additional 220sqm).
- Redecoration and better ventilation to second floor spin studio.

3.16.2. There would be no change to the building area as all new facilities provided within the existing envelope of the building.

3.16.3. The unused creche would be converted into an Innerva studio with a general refresh (flooring and redecoration) to the café area. Public facing circulation will also be redecorated.

3.16.4. New adventure play equipment is proposed in the current soft play area with digital/gaming features providing entertainment to all ages. New ventilation will also be provided in the adventure play hall. A specialist soft play provider has designed a unique adventure play set up for the Walnuts which can be reviewed on pages 61-66 of Appendix B.

3.16.5. New features to the soft play offer include, but are not limited to, digital “tag” and gaming play features; a sensory room and toddler play; a cyber tower for two competitors to race; a spider web maze and racing slide.

3.16.6. The ground floor dry changing rooms will be brought back into use to serve both the sports hall and gym/studios. The current wet change will have new flooring, ceilings, cubicles and lockers. In the pool hall, the pools will be relined with new plant provided. The spectator seating will be replaced, and new flooring provided.

3.16.7. The plant serving the sports hall will be renewed to create a better environment for users.

3.16.8. The expansion of the gym is the main change on the first floor. Bringing the ground floor dry changing rooms back into use provides an opportunity to remove the changing facilities on the first floor allowing the expansion of the gym. This aligns with national leisure trends where users typically arrive at the centre ready to use the facilities rather than utilising changing rooms. Page 58-59 of Appendix B, produced by a specialist gym designer, shows what the gym could look like considering current and growing trends in the fitness industry.

3.16.9. Removing the dry changing rooms eliminates the awkward access to the gym, which is currently through the changing areas, and allows for better visibility of the gym from key circulation areas. The first-floor studio would also be redecorated.

3.17. Officers have also considered feedback from users, groups and the business modelling for further options that could be provided in the centre but are currently not possible due to financial constraints. These options could be considered by the operator in the future, or if other grant sources of funding are found.

- Spa facilities and sauna/steam upgrades
- Conversion of wet changes into a full village change.
- Sports hall refresh
- Main pool hall refresh and new finishes
- Learner pool hall refresh and new finishes
- Boom
- Full redecoration to the adventure play hall
- Splash play
- Outdoor Improvements
- Immersive cycle studio
- Future studio

- 3.17.1. The cost of these additionalities varies hugely from the smaller items, such as a sauna upgrade, to larger costs such as the inclusion of a spa. It should be noted that not all items listed above are compatible with each other. For example, should a spa be provided, that would negate the need to upgrade the sauna and steam rooms already in situ.
- 3.17.2. The project team has considered how these facilities could be accommodated within the leisure centre should additional funding be available. Page 31 of Appendix D (Part 2) indicatively shows where some of these extras would be located.

TENANT (OPERATOR) OF THE FUTURE FACILITIES

- 3.18. As set out in paragraph 3.11 above, in order to support the sustainability strand of work, officers have investigated potential operator models for the redeveloped facilities. Given the commercial sensitivities on this, the options for Members consideration are contained in the Part 2 report.
- 3.19. Both sites are subject to 40-year leases which commenced in 2019, between the Council and MyTime Active. The Council can terminate these leases if major construction works or demolition programme was to be carried out with option to grant a new lease to a new tenant. Equally, the Council could issue a new lease to MyTime Active with market rent payable.
- 3.20. As part of the works carried out to date, officers have undertaken extensive market engagement in relation to consideration of a future operator, both with providers but also with users. More detail in relation to this is contained in Part 2.

PROGRAMME OPTIONS

- 3.21. A critical element of the major works programme is the structuring and timing of the works. It is important to make this decision now so that inflation can be costed into the final costed proposals at the end of RIBA 4. The Council has had requests from groups and users of both centres to prioritise one or other centres first – and there is a compelling argument in each case. Whilst both centres have a substantial programme of works required, the Walnuts has faced periods of forced closure due to failing equipment, but West Wickham is in a significantly worse structural condition and could be at risk of imminent closure. Options officers have considered include:
- 3.22. **Option 1** – Both site works running concurrently. This option would have the largest impact on residents, the operator and staff members as both centres would be closed for a year, with a particular impact on swimming provision in the borough. However, closing both sites at the same time in summer 2024 would result in all works being complete by spring 2026 with the Walnuts opening slightly earlier in autumn 2025. This option is also the most financially advantageous as it minimises the impact of inflation. Given the negative impacts on residents and staff, this option is not recommended.
- 3.23. **Option 2** – Works are undertaken consecutively. This option would minimise the impact of displaced demand from residents but could take up to a year longer than Option 1, with works expected to conclude in winter 2026 with West Wickham opening at the end of 2025. This option would also suffer from an increased inflation impact which has been estimated to add an additional circa 10% to the build cost of the second centre (The Walnuts, circa £1m additional costs). If this option was chosen, the recommendation would be to commence the works to West Wickham first in order to reduce the impact of inflation and because the site could be forced to close at any time due to its current condition. This option is not recommended due to the potential for additional funding needed above the OPR's indicative budget.
- 3.24. **Option 3** – Works undertaken concurrently but pool kept open throughout the project. This option would delay works to the second site, while works to the first site's pool are completed.

Once the first site's pool is open (the rest of the building would remain shut until completion), the second site would close to begin works. This option anticipates all works being completed by Spring 2026 while one site would open earlier at the end of 2025. With this option, it is likely that the Walnuts' pool hall would be completed first and reopened while works to the rest of the centre are completed. West Wickham would be closed following the Walnut's pool reopening allowing all works at West Wickham to be carried out together. This is because the West Wickham's pool hall roof is integral to the rest of the building and needs replacing. The inflation on this option is expected to be lower than Option 2 but extra funds may still be required above that of Option 1. This is the recommended option.

3.25. These three options and timescales have been generated with the following assumptions:

- Executive approval given no later than November 1st 2023.
- A decision on operator approach is made at the same time as funding is approved to enable plans to be brought forward in a commercially sensitive way.
- Core works are fully agreed, varying these will impact the programme.
- At this stage, the programme dates are indicative until a principal contractor has been appointed.

NEXT STEPS

3.26. Following completion of the RIBA 2 package of works, officers are now seeking £1.865m, to funded by the OPR's indicative budget for Leisure Centre works, to progress both sites through RIBA 3 and 4.

3.26.1. According to current programmes, RIBA 3 would complete by February 2024 and RIBA 4 by July 2024. At which point the Council would have fully costed proposals for each Leisure Centre ready for Members' consideration.

3.26.2. A breakdown of the RIBA 3 and 4 package of works for each site has been included below:

3.26.3. Walnuts Leisure Centre:

PROJECT ELEMENT	RIBA 3	RIBA 4
ALS Development Management and Delivery	£17,550.30	£17,550.30
Project Management and Employers Agent	£14,040.30	£14,040.30
QS Contract Administration and Cost Analysis	£10,530.15	£10,530.15
Principal Designer	£1,000.00	£2,000.00
Café & Kitchen design	£2,450.00	£2,450.00
Contractor Management	£55,591.20	£108,572.20
Architect - Design fees	£72,200.00	£126,350.00
Structural and Civils -Design Services Consultant	£36,000.00	£48,000.00
M & E - Design Services Consultant	£36,000.00	£48,000.00
Building Control		£3,500.00
Planning Consultant		
Planning Fees		
Carbon Consultant	£2,500.00	£2,500.00
Fire Engineer/Consultant	£7,500.00	£7,500.00
Acoustic Consultant	£2,500.00	£2,500.00
Air Tightness		
Landscape Consultant		
Ecology Consultant		
Third Party	£2,500.00	£5,000.00
Pool and Filtration Specialist Consultant	£5,000.00	£10,000.00
Specialist Design Input	£5,000.00	£7,500.00
Highways Design		
BREEAM Consultant		
BREEAM Design Related Fees		
Sundry Costs and Attendance	£10,000.00	£15,000.00
SURVEYS	£75,000.00	-
OHP - Contractor	£23,234.34	£28,831.67
Insurance	£3,262.74	£4,115.56
FEE PROPOSAL TOTAL - (exc VAT)	£350,268.43	£468,940.18

3.26.4. West Wickham Leisure Centre:

PROJECT ELEMENT	RIBA 3	RIBA 4
ALS Development Management and Delivery	£26,164.80	£26,164.80
Project Management and Employers Agent	£20,931.90	£20,931.90
QS Contract Administration and Cost Analysis	£15,698.85	£15,698.85
Principal Designer	£1,000.00	£2,000.00
Specialist and Loose Facilities and Equipment	£2,450.00	£2,450.00
Contractor Management	£55,591.20	£108,572.20
Architect and Lead Consultant- Design Services Co	£115,283.00	£171,500.00
Structural and Civils -Design Services Consultant	£67,500.00	£90,000.00
M & E - Design Services Consultant	£67,500.00	£90,000.00
Building Control		£3,500.00
Planning Consultant		
Planning Fees		
Carbon Consultant	£2,500.00	£2,500.00
Fire Engineer/Consultant	£10,000.00	£12,500.00
Acoustic Consultant	£2,500.00	£5,000.00
Air Tightness		
Landscape Consultant		
Ecology Consultant	£2,500.00	£2,500.00
Third Party	£2,500.00	£5,000.00
Pool and Filtration Specialist Consultant	£5,000.00	£10,000.00
Specialist Design Input	£5,000.00	£7,500.00
Highways Design		
BREEAM Consultant		
BREEAM Design Related Fees		
Sundry Costs and Attendance	£10,000.00	£15,000.00
SURVEYS	£95,000.00	-
OHP	£33,065.57	£39,267.92
Insurance	£4,408.74	£5,235.72
FEE PROPOSAL TOTAL (exc VAT) 14	£478,348.51	£568,075.84

3.27. The below table provides an indicative timeline for the delivery of this project.

Executive approval for RIBA 3/4 and construction works, including appointment of delivery partner for works, alongside agreement of operator approach and programme options.	October 2023
Principal Contractor chosen via framework mini competition	November 2023
RIBA 3 stage of works	November 2023 – February 2024
Report to Members following completion of RIBA 3 seeking approval for construction works.	February 2024
RIBA 4 stage of works	February 2024 – July 2024
Mobilisation and start of works (assuming Option 3 of the programme options is chosen)	Summer 2024
Completion of works on first site	End of 2025
Completion of works on second site	Spring 2026

GRANT FUNDING

3.28. Regeneration officers are submitting funding applications where appropriate in an effort to secure additional funding, this has the potential to mitigate costs rising for the Council, and also has the potential to increase the scope of the works beyond the core requirements. At present, the external funding available is based on sustainability improvements to the centres in order to reduce energy use, decrease or eliminate a reliance on gas and move the centres to greener operating systems. Members must note, however, that while funding bodies are allowing applications for centres with regeneration plans in place, any funding awarded is required to be an addition, and approved by the Council's Section 151 officer, as not forming part of the Council's existing plans.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The new leisure centres will offer a range of activities that will be beneficial for vulnerable children. Specifically, the Walnuts Leisure centre soft play design includes a sensory room which are proven to support emotional regulation, sensory stimulation, and focus.
- 4.2 Both centres will feature spaces for Innerva suites (to be fitted by the tenant) designed to assist individuals with reduced physical capabilities due to old age or physical injuries and are organised in a way to ease loneliness and encourage social interaction. The leisure centre works will also improve accessibility, especially at West Wickham, where no lift to the first floor is present.
- 4.3 Changing Places toilets, which cater for those with complex and multiple disabilities, will also be provided as part of the core works to the centres. With only three registered Changing Places facilities in the borough, residents, their families, assistants and carers are excluded from local

spaces due to lack of provision. This includes both West Wickham and the Walnuts leisure centres. The inclusion of these services will create more inviting locations for those in need of the facilities and create easier access to leisure activities.

5. TRANSFORMATION/POLICY IMPLICATIONS

- 5.1 This project contributes to the Council's Transformation Programme and its vision that 'the London Borough of Bromley is a fantastic place to live and work, where everyone can lead healthy, safe and independent lives in supportive communities.'
- 5.2 The Council's Regeneration Strategy also advocates for the development of 'new leisure centres that respond to current and future need in West Wickham and Orpington and create commercial opportunities that complement and support the community facilities, to ensure sustainable futures.
- 5.3 The Bromley Local Plan states its vision that "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".

6. FINANCIAL IMPLICATIONS

- 6.1 The paper requests members to approve the core requirements for both Walnuts and West Wickham Leisure Centres as set out in 3.14 and 3.16 respectively of the Part 1 report so that officers can progress these plans through RIBA 3 and 4.
- 6.2 The paper also requests members to approve Option 3 of the programme options which will allow the works to take place concurrently but with a pool operational throughout the proposed works timeline.
- 6.3 The cost of RIBA 3 and 4 stages to be completed on both sites equate to £1.867m with a further £150k for RIBA 4, members are requested to approve the drawdown of these sums from the allocated OPR budget for the Leisure centres.
- 6.4 There is sufficient budget within the OPR allocation for the leisure centres to fund the RIBA 3 and 4 costs as outlined in section 6.4 above.
- 6.5 Further comments are provided in Part 2 of the paper.

7. PERSONNEL IMPLICATIONS

See Part 2

8. LEGAL IMPLICATIONS

Legal Contracts

- 8.1. This report makes recommendations as summarised in the Procurement Implications below.
- 8.2. These public works contracts are in excess of the financial thresholds of the Public Contracts Regulations 2015 (the Regulations), which is currently £5,336,937 excluding VAT, and so must be procured in accord with the Regulations. The use of a compliant framework agreement to procure the works is permitted under Regulation 33 and this has been confirmed below.

- 8.3. The arrangement for the proposed works contracts is unusual insofar as ALS will eventually enter into works contracts rather than LBB directly entering into these works contracts for works carried out on the Council's property. ALS will be the Employer and the relationship will need to be closely monitored by LBB officers with all collateral warranties obtained from the sub-contractors in order to provide the Council with contractual protection.
- 8.4. All Council decision-making must be made rationally in accordance with administrative law principles, by taking proper account of all relevant considerations and disregarding those that are irrelevant. Furthermore, the Council must comply with its fiduciary duty towards taxpayers and ensure resources are used prudently.
- 8.5. Should Members approve the recommendations then Legal Services will work with officers in order to assist in concluding any contractual documentation necessary and commissioning any external legal advice and assistance as may be required.

Legal Property

- 8.6. In order to carry out the works of reconstruction referred to in paragraph 3.14 and 3.16 above to both the West Wickham and Walnuts leisure centres the current Tenants in both cases will need to vacate the properties the subject of the two leases for the period of the proposed works.
- 8.7. Both leases dated 4 April 2019 and made between the Mayor and Burgesses of the London borough of Bromley (1) and My Time Active (2) contain break clauses in similar fashion on the part of the Council as Landlord in clause 39 of each Lease permitting the Council to break the leases for the purposes provided always that the conditions set out in the Landlord's break provisions are complied with by the Council as Landlord.
- 8.8. These conditions are as set out below.
- 1) The Landlord may terminate the leases at any time by serving a break notice on the tenant at least 12 months before the break date.
 - 2) The break notice shall specify the break date but shall not specify as the break date which is earlier than 12 months after the date on which the break notice is deemed to have been served on the Tenant (and for avoidance of doubt the day of deemed service shall not be taken into account in calculating the period of 12 months).
- 8.9. The Break Notice shall be of no effect if:
- 1) The Break Notice does not comply with the requirements of the Break Clause or
 - 2) The Break Notice is served otherwise than in accordance with the provisions of the Break Clause or
 - 3) At the date the Break Notice is served the Landlord has not passed a formal resolution to;
 - 4) Demolish or reconstruct the Property or a substantial part of it or the building of which the Property or a substantial part of that building or to carry out substantial works of construction at the Property or the building of which it forms part or to sell the Property.
 - 5) And to serve a Break Notice to terminate the lease(s).
 - 6) The break notice shall be in writing.

7) Time shall be of the essence in respect of all time periods and limits in relation to the exercise of the Break Clauses

8.10. It must be noted that the Tenant has Tenant's break clause set out in both leases at clause 40 of the lease(s), which is exercisable on similar pre-conditions to the Landlord's Break Clauses

8.11. The Council has power under s.123 of the Local Government Act 1972 ("The Act") to dispose of land for the best consideration that can reasonably be obtained (usually based on open market value).

8.12. "Disposal" under The Act includes the grant of leases for a term of 7 years or more. The proposed new letting referred to in paragraph 3.19 of this report will need to comply with the requirements of best value element of The Act.

9. PROCUREMENT IMPLICATIONS

9.1 General Recommendations:

This report seeks to undertake a programme of works as set out in 3.24, for completion by Spring 2026, with delegated authority to the Director for Housing, Planning, Property and Regeneration, in consultation with the portfolio holder, to approve any reasonable changes to the works needed after Executive approval to align with the budget as set out.

9.2 West Wickham:

This report further seeks to award a Direct Award contract via the UK Leisure Framework run by Denbighshire County Council, as set out in 3.14 of this report to progress these plans through RIBA 3 and 4 to Alliance Leisure Services for £1,047,000 based on the core requirements laid out in this report. Following RIBA 3 a subsequent report will seek to approve a further award of contract for West Wickham Leisure Centre to Alliance leisure Services via the UK Leisure Framework run by Denbighshire County Council.

9.3 The Walnuts:

This report further seeks to award a Direct Award contract via the UK Leisure Framework run by Denbighshire County Council, as set out in 3.16 of this report so that officers can progress these plans through RIBA 3 and 4 to Alliance Leisure Services for £820,000 to progress the Walnuts Leisure Centre Major Works Programme to RIBA 4 based on the core requirements laid out in this report. Following RIBA 3 a subsequent report will seek to approve a further award of contract for Walnuts Leisure Centre to Alliance leisure Services via the UK Leisure Framework run by Denbighshire County Council.

9.4 In accordance with Clause 3.5 of the Contract Procedure Rules, the Head of Procurement has been consulted regarding the use of the Framework and the Council is able to make use of the Framework and having been properly included on the Contract Notice.

9.5 As the contract value is over £30,000 including VAT, an award notice will need to be published on Contracts Finder. As the contract value is over the thresholds set out in the PCR 2015, a Find A Tender award notice must be published.

9.6 The Council's specific requirements for authorising an award of contract are covered in CPR 16 with the need to obtain the Approval of the Executive following Agreement by the Chief Officer, the Assistant Director Governance & Contracts, the Director of Corporate Services and the Director of Finance for a contract of this value. In accordance with CPR 2.1.2, Officers must take all necessary professional advice.

- 9.7 The actions identified in this report are provided for within the Council's Contract Procedure Rules, and the proposed actions can be completed in compliance with their content.

10. PROPERTY IMPLICATIONS

- 10.1 Both the Walnuts Leisure Centre and West Wickham are owned freehold by the Council but are occupied and operated by Mytime Active on commercial lease arrangements as follows:
- Walnuts Leisure Centre – leased to Mytime Active for a term of 25 years dated 4th April 2019, commencing 1st April 2019, on a 40-year term expiring 31st March 2059 at a peppercorn (nil) rent.
 - West Wickham Leisure Centre - leased to Mytime Active for a term of 25 years 4th April 2019, commencing 1st April 2019, on a 40-year term expiring 31st March 2059 at a peppercorn (nil) rent.
- 10.2 There is a landlord break clause within each lease allowing the Council to terminate the lease at any time by serving a break notice on the tenant at least 12 months prior to the break date. To affect this break clause the Landlord is required to have passed a formal resolution or resolutions to: 'Demolish or reconstruct the property or substantial part of it or the building of which the property or a substantial part of that building or to carry out substantial works of construction at the property or the building of which it forms part or to sell the property'.
- 10.3 Regeneration colleagues leading on the proposed programme of works will need to instruct the Council's Estates Team on this matter and ensure that suitable notice is given to trigger the break clause to enable such works to take place.
- 10.4 This report sets out an intention to then seek a future tenant to occupy and operate the leisure centres following completion of the works on a commercial basis including on FRI lease terms and paying a commercial rent. The Council's Estates Team will need to be instructed in this regard to appoint suitable advisors to secure a future tenant at the appropriate point in the future ensuring the Council meets its statutory obligations with regards to Section 123 of the Local Government Act 1972 regarding best value which is relevant to all leases with a term of 7+ years.

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 11.1 The Leisure Centre Major Works programme will have significant advantages in terms of carbon reduction and social value. The core requirements include the reduction of carbon emissions at both sites as inefficiencies are addressed and upgraded. For example, modern MEP systems, double glazing, insulation and LED lighting will be utilised. Funding applications are underway in order to further decarbonise the centres as much as possible. Social value and the use of local subcontractors is also included as a quality question in the mini-competition tender documents.

12. IMPACT ON THE LOCAL ECONOMY

- 12.1 The leisure centre major works programme will have a positive economic impact on Orpington and West Wickham town centres, providing commercial opportunities, continued employment and additional facilities to attract footfall.

13. IMPACT ON HEALTH AND WELLBEING

- 13.1 The current operator provides the following health programmes on behalf of the Council: FreshStart, an exercise referral programmer offering supervised physical activity for those recovering from illness or those living with a long term medical condition; HeartSmart, a service designed to improve the health and wellbeing of those diagnosed with heart conditions and Escape Pain, a pain management group-based programme designed to help manage osteoarthritis of the hip and/or knee.
- 13.2 While closure of the centres may result in temporary loss of facilities for the duration of the works, the lasting impact of this major works programme will be significantly advantageous on local health and wellbeing and provide long term facilities. For example, Innerva suites are included in the core requirement of the centres, offering power-assisted exercise equipment which provides a low impact, full-body workout circuit for older adults and those living with long term conditions or physical injury. The machines would be outward facing facilitating social interaction between users, working to ease loneliness in the older generation. The suite promotes active ageing, helping to combat loss of muscle tissue and enhance balance and flexibility into older age.
- 13.3 Business modelling of the proposed works also anticipates increased utilisation of the centres due to the expanded, upgraded and modern features, helping to increase active participation in the borough. It is therefore expected that these works will have a significant impact on health and wellbeing and officers will work with the operator and public health to assess this overtime.

14. CUSTOMER IMPACT

- 14.1 While the leisure centres will temporarily be closed to customers during the construction periods, the benefits of the enhanced facilities will far outweigh this inconvenience. The upgraded amenities will provide an elevated range of activities available at both sites, including renovations to existing areas such as the changing rooms and reception areas, as well as the addition of new features such as Innerva suites and a soft play area at West Wickham. Furthermore, there will be a variety of ‘behind-the-scenes’ upgrades to the plant and MEP systems that will improve the overall customer experience at both sites.
- 14.2 The recommended option for delivery, Option 3, will also mitigate the impact on swimming clubs, swimming lessons and public access to pool space.

15. WARD COUNCILLOR VIEWS

- 15.1 Ward Councillors have been supportive of the development of the leisure centres in both Wards, their comments have been requested in relation to this specific report and will be tabled at the committee.

Non-Applicable Headings:	N/A
Background Documents: (Access via Contact Officer)	Procurement Strategy for Leisure Centre Major Works Programme (Report No.HPR2023/044)



Leisure Centre Major Works Appendices

October 2023

Contents



1	Appendix A	Results of the Public Engagement Exercise.....	03
2	Appendix B	Core Requirements.....	42



Leisure Centre Major Works

Results of the Public Engagement Exercise

Appendix A

Results of the Public Engagement Exercise

Introduction



Earlier this year, Alliance Leisure Services were initially appointed to undertake a RIBA 1 package of works and a wide-reaching public engagement exercise on behalf of the Council. Leisure Net, a specialist leisure research agency, was subcontracted by Alliance Leisure to write and launch the surveys and host focus groups.

The online surveys for both leisure centres were launched on Monday 27th February for six weeks and collected 3436 responses for the Walnuts and 2699 for West Wickham. The survey was designed to find out users and non-users of the facilities would like to see in the leisure centres.

The survey was specifically targeted on social media to those geographically located in the borough. Posters with QR codes, linking residents to the surveys, were produced and shared with libraries and the leisure centres for display. Digital versions of the posters were also produced and displayed on JC Decaux screens. Accessible versions of the surveys, large print (for those with visual difficulties) and easy read format (for those with learning difficulties) were produced and shared with libraries and leisure centres to be printed upon request. Our consultants had staff members equipped with iPads inside and outside the leisure centres asking members of the public to complete the survey.

Unsurprisingly, the majority of those that took part in the survey said they wanted a redeveloped facility, with less than half of users at both centres currently rating the centres as 'good' or better. Notably, between 75-85% of users said they would use a redeveloped centre more often. These figures rose to 89-92% for non-users, evidencing that redeveloping these centres would increase activity levels within the borough.

The vast majority of users at both the Walnuts (97%) and West Wickham (88%) are residents of Bromley. There is an equally high number of non-users who are Bromley residents and would use the centres more often should they be developed. 86% of the Walnuts users and 74% of West Wickham users travel less than 15 minutes to use the centre, demonstrating that a redevelopment of these facilities would truly benefit those in the immediate locality of the centres.

A copy of the Walnuts User survey has been provided in this appendix.

Executive Summary of the Public Engagement Exercise

West Wickham Leisure Centre

WEST WICKHAM - Public Survey Results - <i>What is important to you?</i>					
FITNESS		USERS	NON-USERS	SWIMMING	
Group Cycling Studio		30%	31%	Adult Lane Swimming	59%
Group Exercise Studio		60%	58%	Family Swim Session	47%
Gym		77%	68%	Leamer Pool	51%
Health Improvement Activities		32%	41%	Main Pool	97%
HIIT Studio		30%	31%	Splash Play	32%
Mind & Body		60%	66%	Swimming Clubs	29%
FAMILY		USERS	NON-USERS	SOCIAL & COMMUNITY SPACES	
Children's Parties		47%	45%	Café	92%
Creche		22%	27%	Flexible Working	20%
Sensory Play		35%	36%	Meeting Rooms	14%
Soft Play		62%	71%	Social Events	26%
Water Based Inflatables		73%	66%	WiFi	59%
ACTIVE SENIORS		USERS	NON-USERS		
Power Assisted Equipment		50%	47%		
Social & Group Activities		57%	67%		
Water Based Classes		74%	74%		

Executive Summary

The results of the online surveys have been used by officers and the specialist delivery partner, Alliance Leisure Services, to guide decision making when forming the core requirements for each centre.

The results for West Wickham were similar to those of the Walnuts in that Group exercise studios, the gym, mind & body facilities, soft play, swimming pools and a cafe were identified as important to a large number of residents while also being achievable within the scope of works.

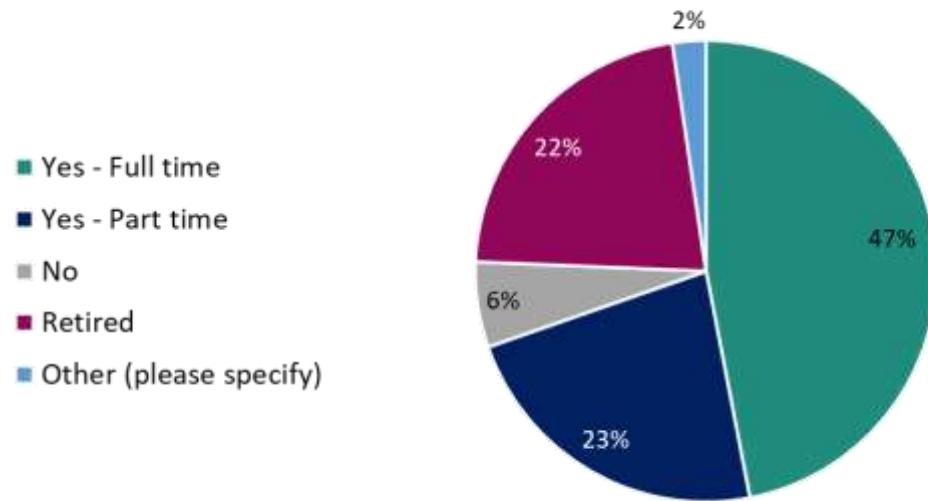
Other high scoring responses, such as water inflatables, water-based classes and Wi-Fi could be offered by the operator in the centre post completion of works.

Many users complained of the poor accessibility throughout the centre with no lift to the first floor.

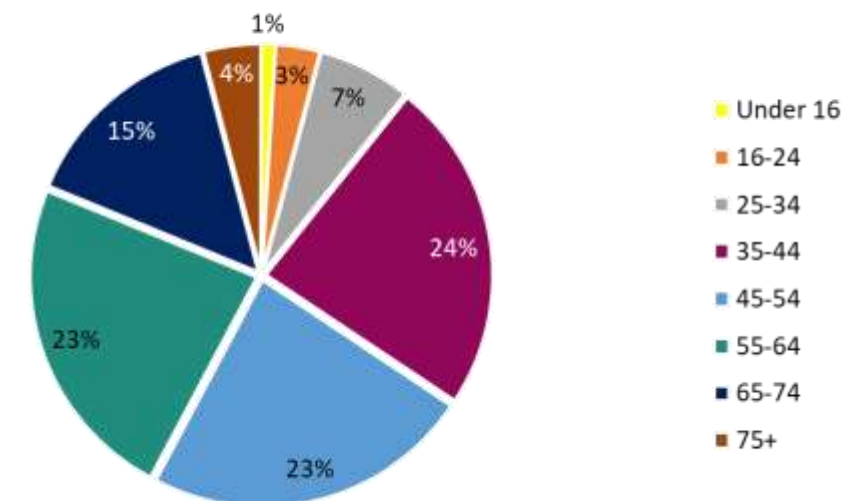
Demographics of the Public Engagement Exercise

West Wickham Leisure Centre

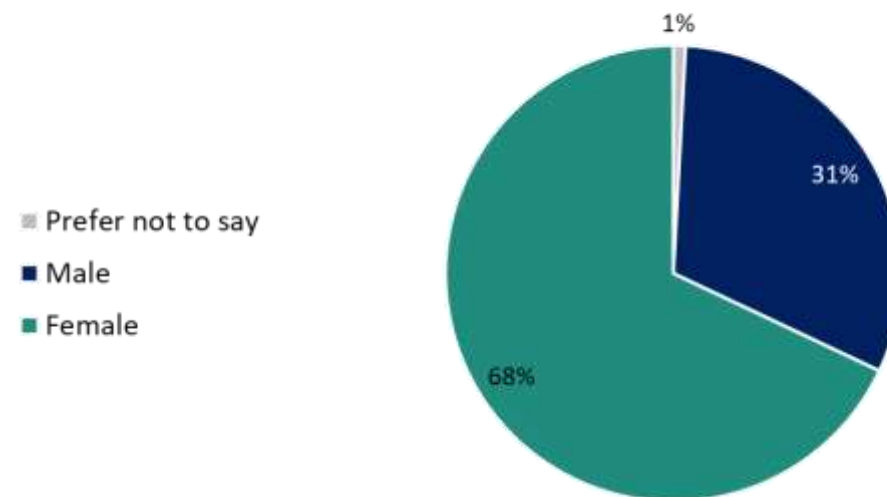
Are you in employment?



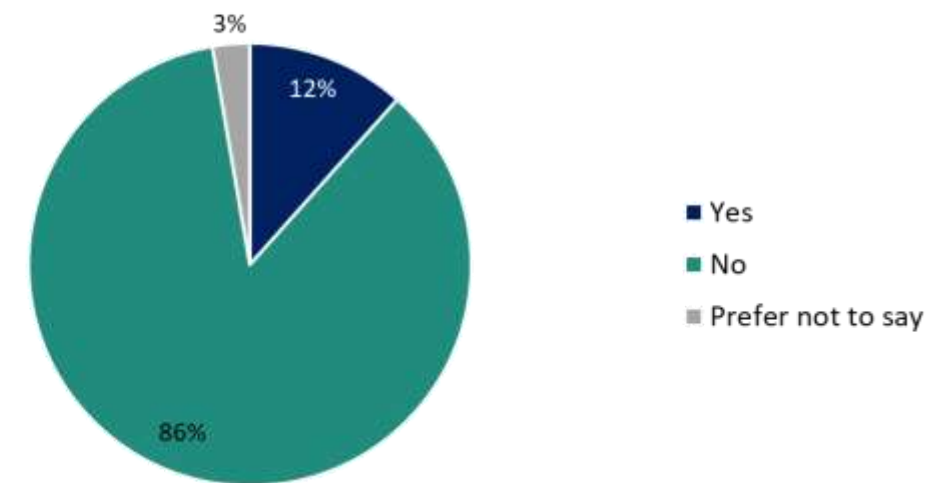
Age:



Gender:



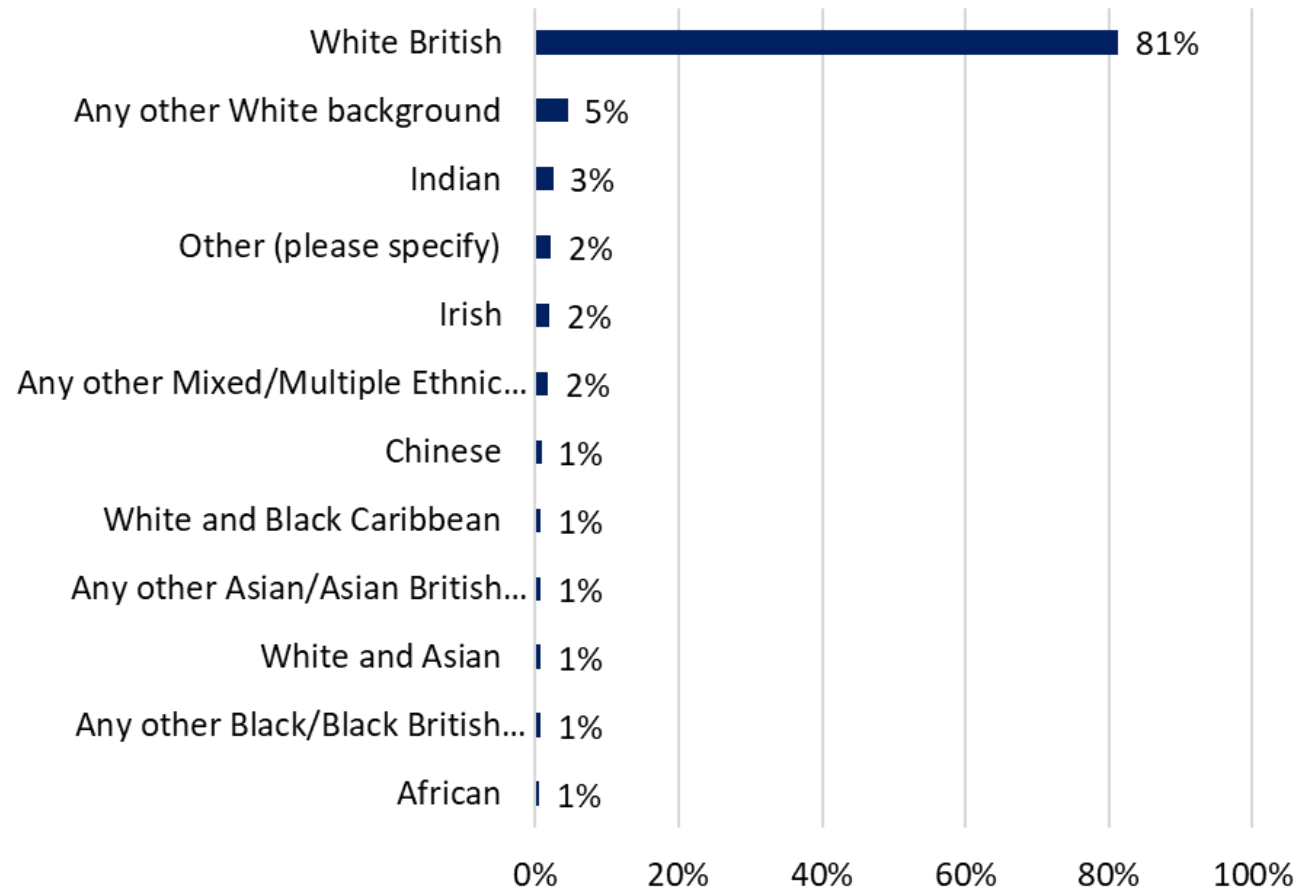
Are your day-to-day activities limited because of a health condition or disability which has lasted, or is expected to last, at least 12 months?



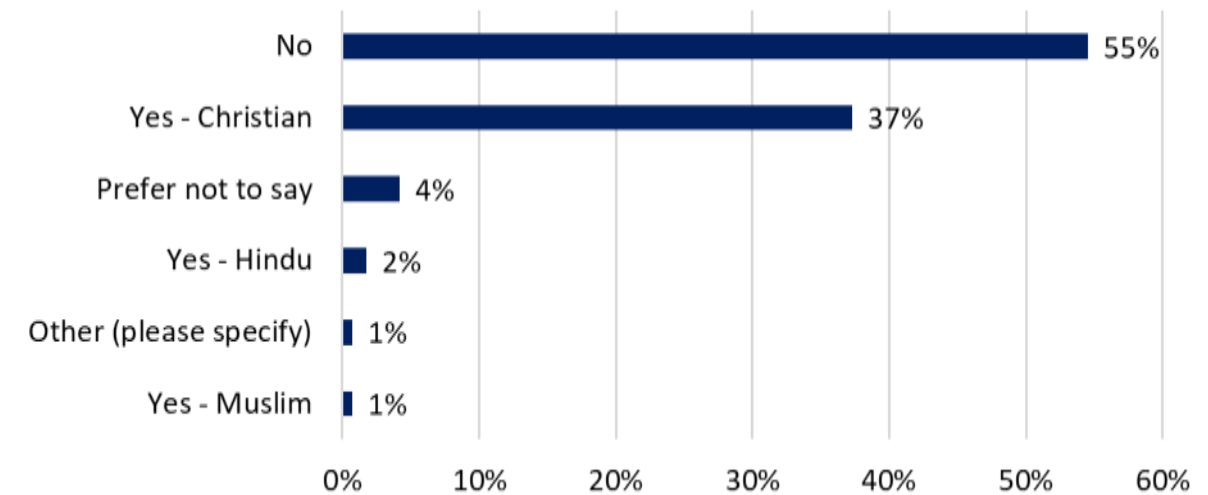
Demographics of the Public Engagement Exercise

West Wickham Leisure Centre

Please indicate to which of these ethnic backgrounds you consider that you belong



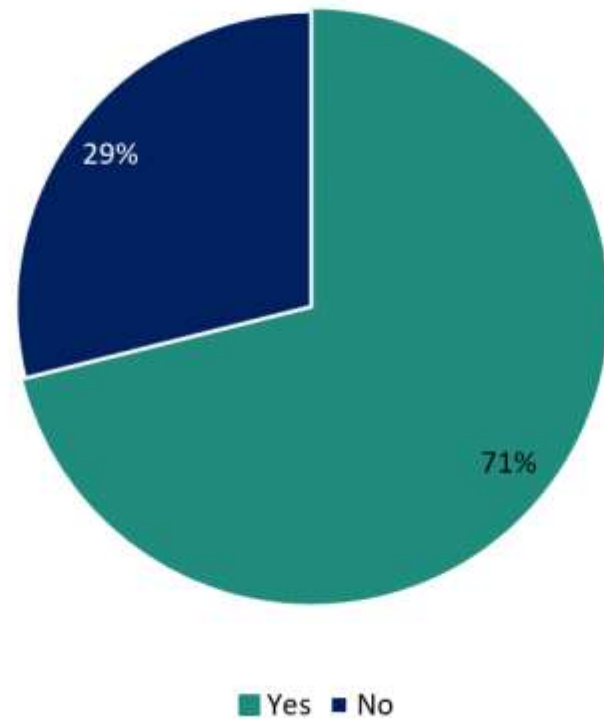
Do you belong to a religion or faith group?



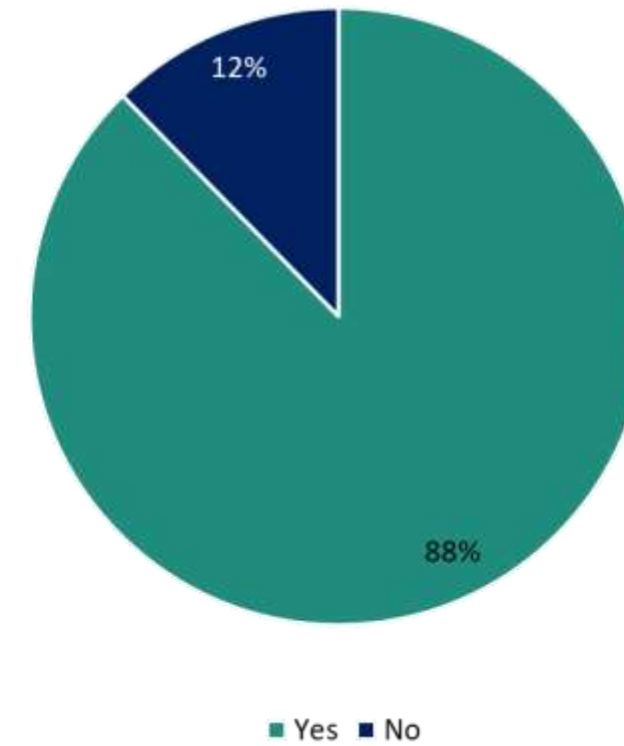
Results of the Public Engagement Exercise

West Wickham Leisure Centre

Do you currently use the West Wickham Leisure Centre?



Are you a resident of The London Borough of Bromley? (Users of West Wickham Leisure Centre)

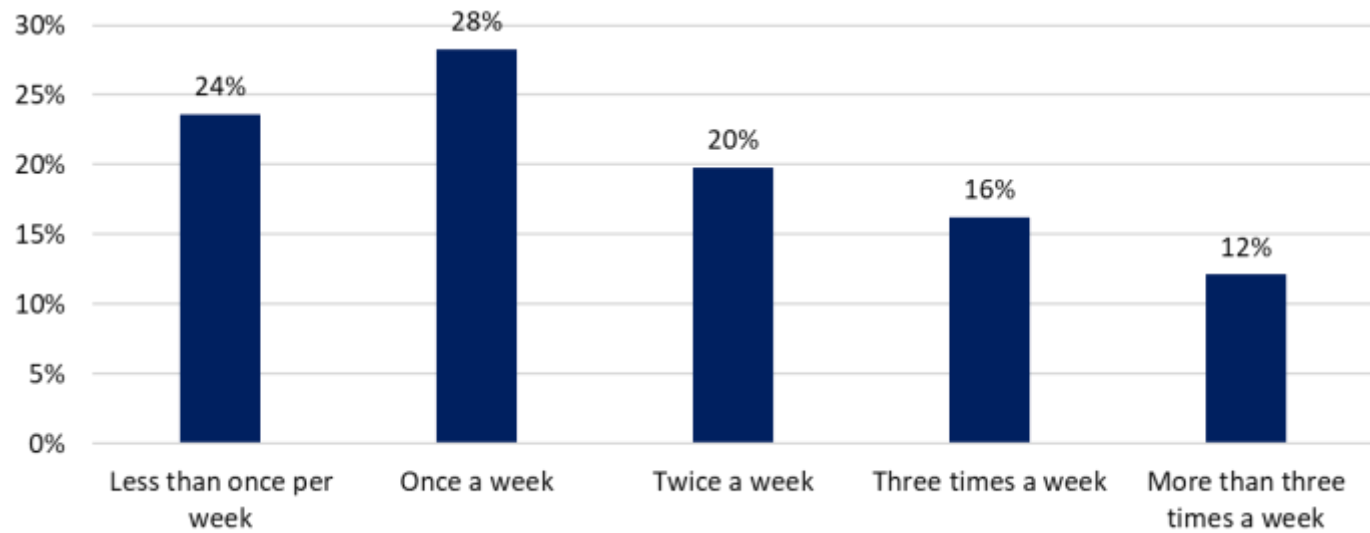


Results of the Public Engagement Exercise

West Wickham Leisure Centre

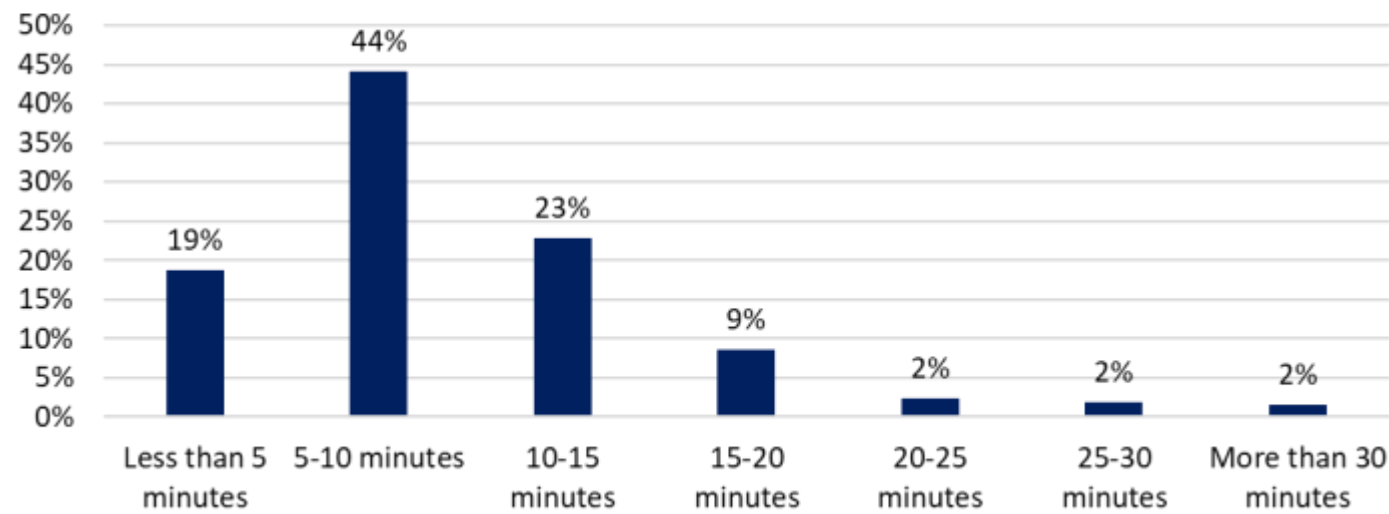
How often do you currently use West Wickham Leisure Centre?

(Users)

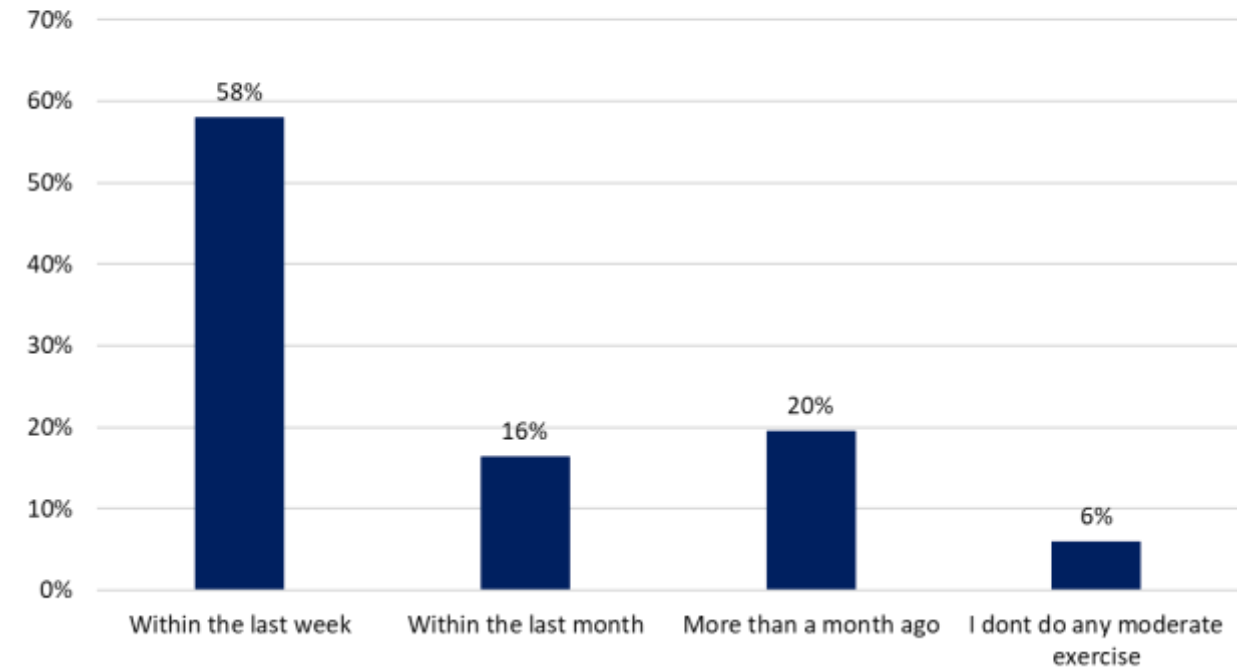


How long does it typically take you to travel to West Wickham Leisure Centre?

(Users)

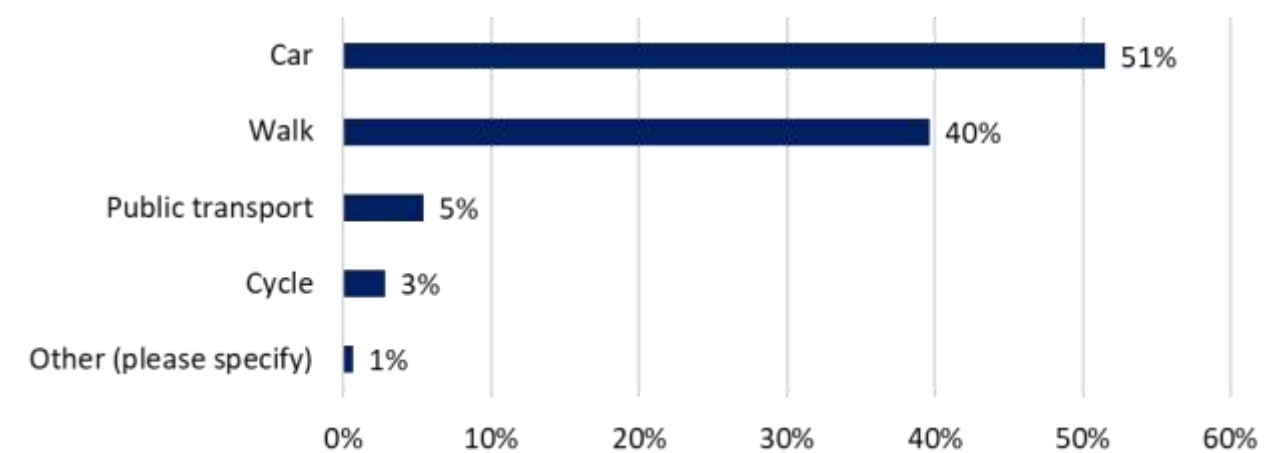


When was the last time you completed any type of moderate exercise/activity at West Wickham Leisure Centre?



How do you travel to West Wickham Leisure Centre?

(Users)

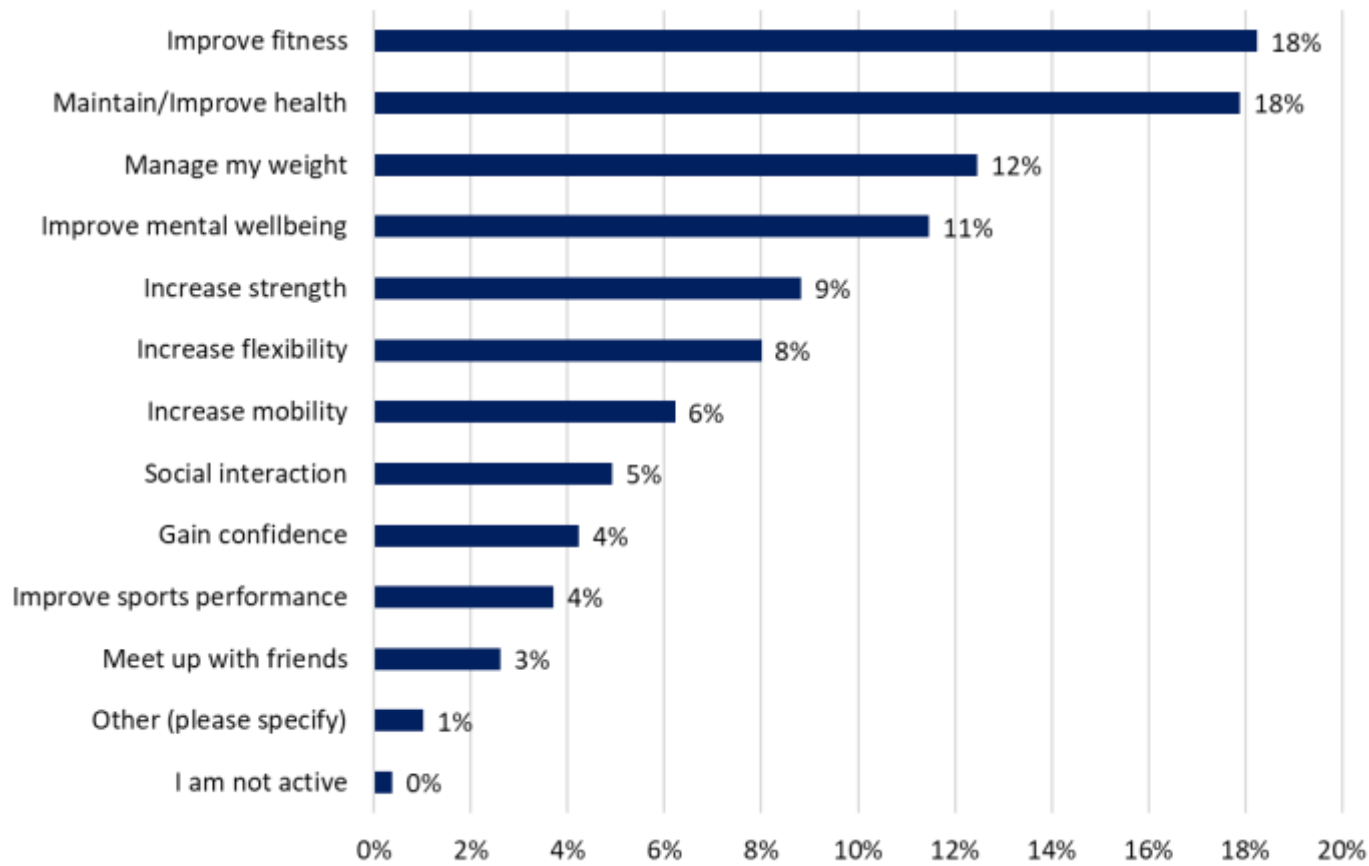


Results of the Public Engagement Exercise

West Wickham Leisure Centre

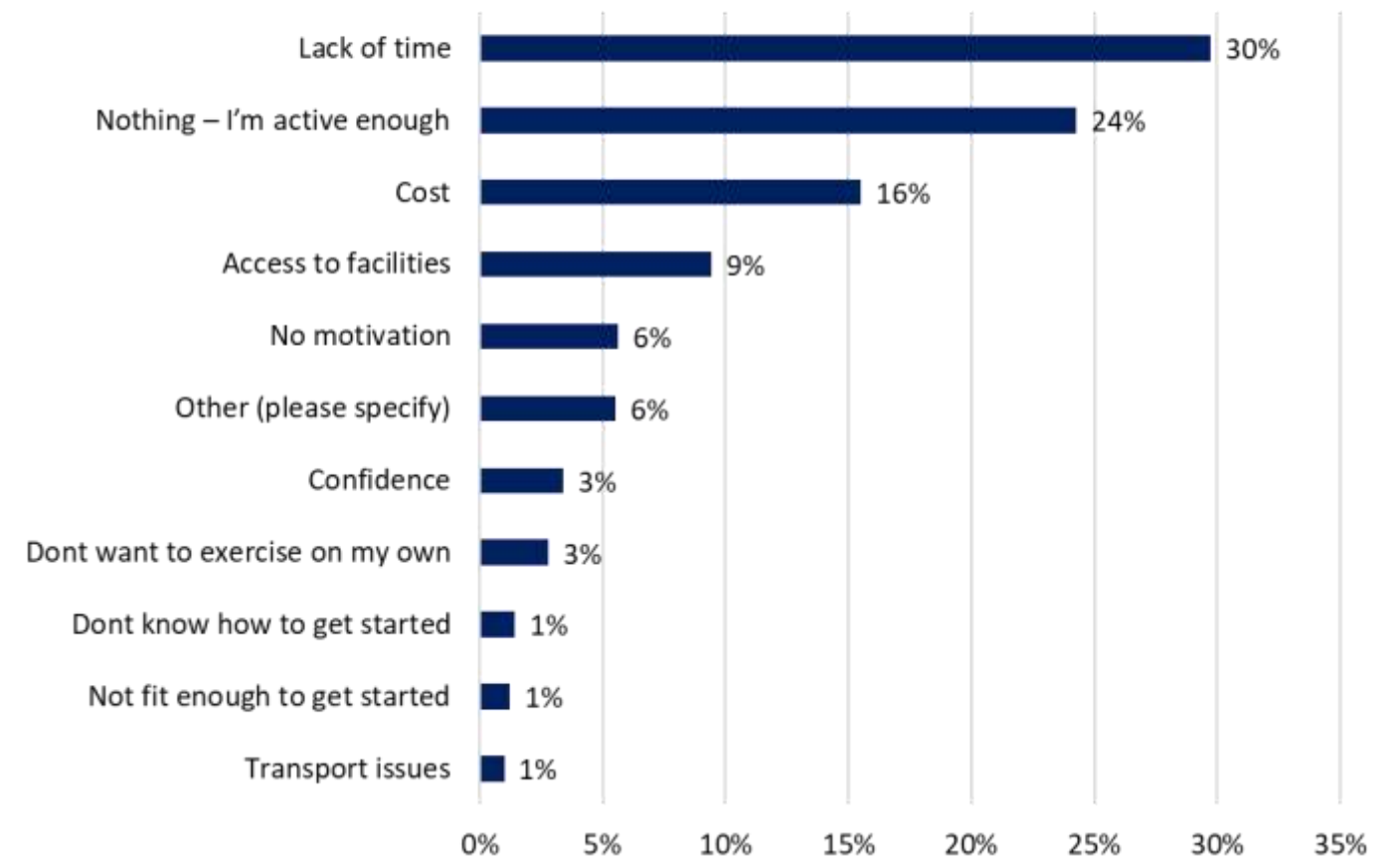
What are your reasons for being active? (Users)

Participants were asked to select all that apply



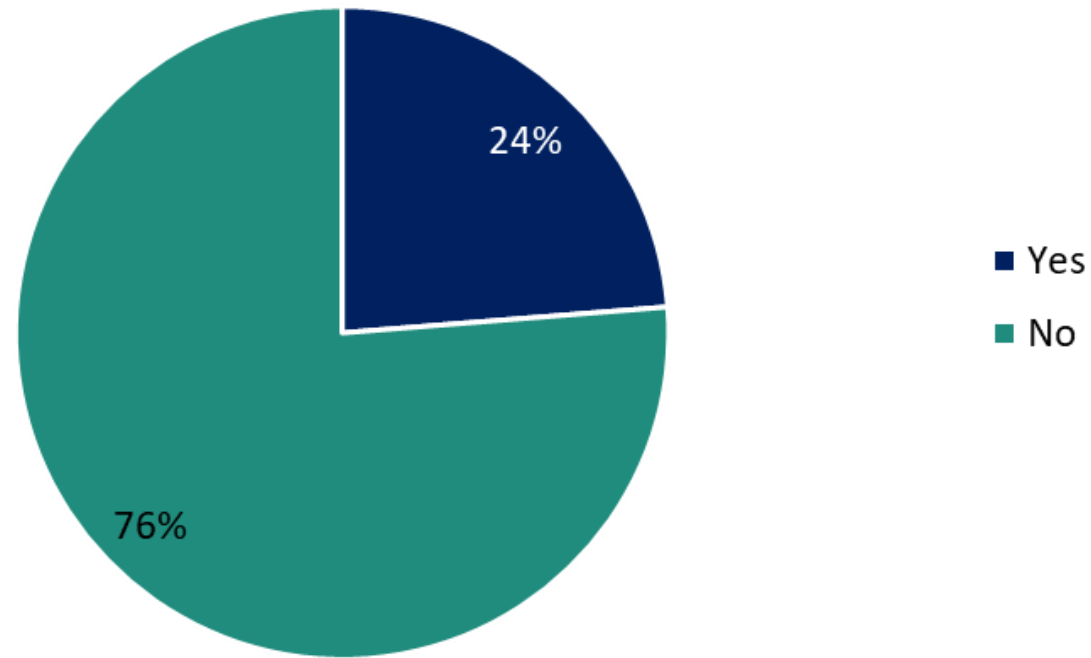
What prevents you doing more exercise than you currently do? (Users)

Participants were asked to select all that apply

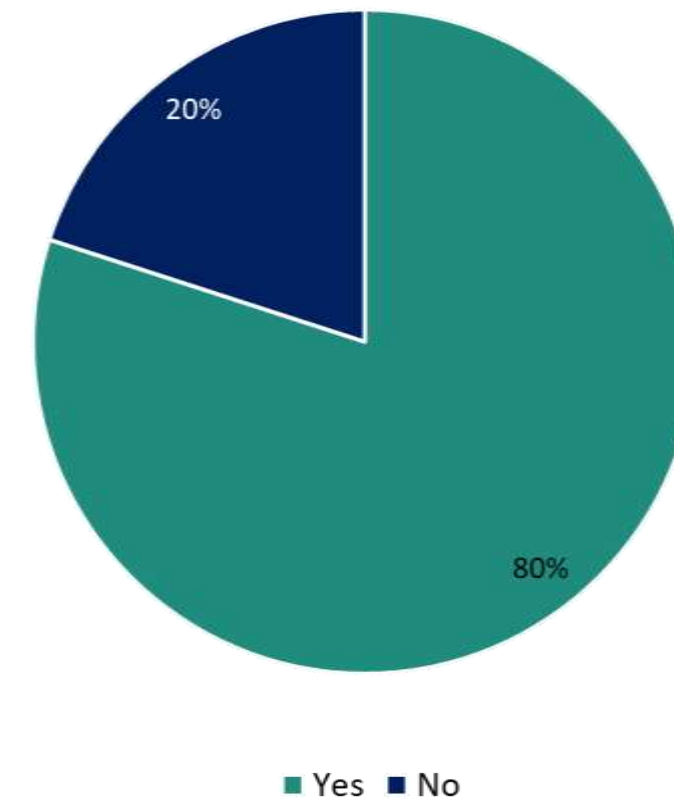


Results of the Public Engagement Exercise West Wickham Leisure Centre

Are you currently a member or user of any other fitness or sports clubs? (Users)



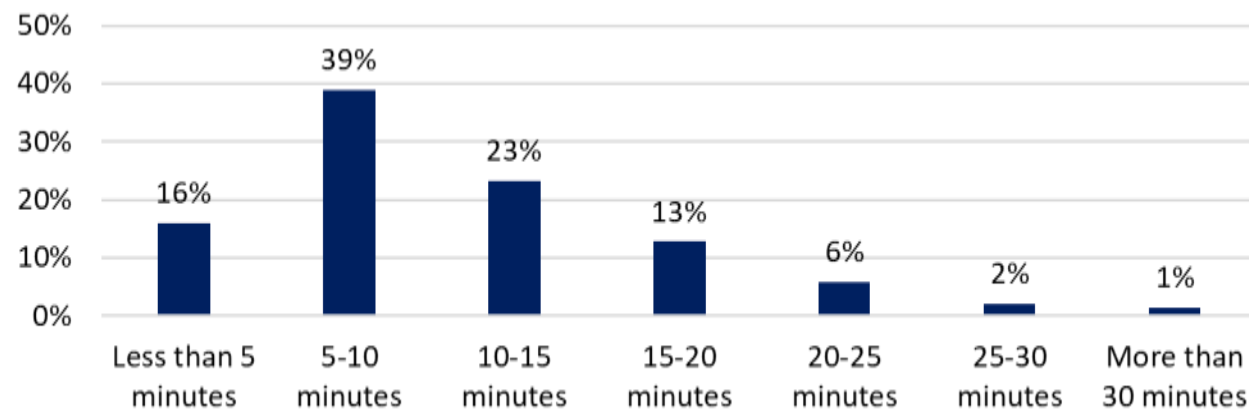
Would a redevelopment of the existing leisure centre encourage you to use the centre more often?



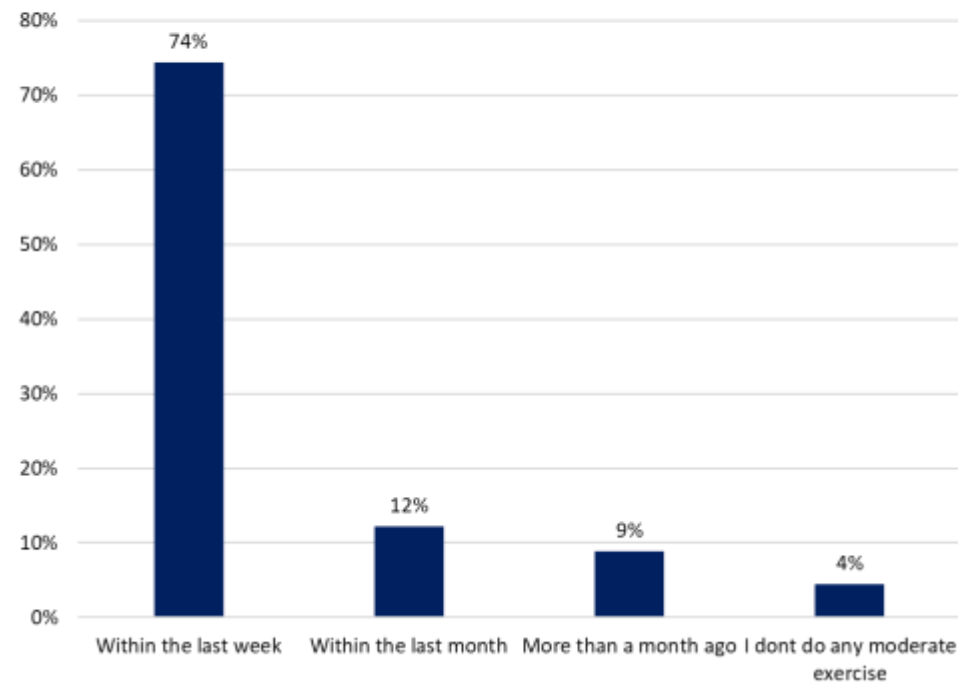
Results of the Public Engagement Exercise

West Wickham Leisure Centre

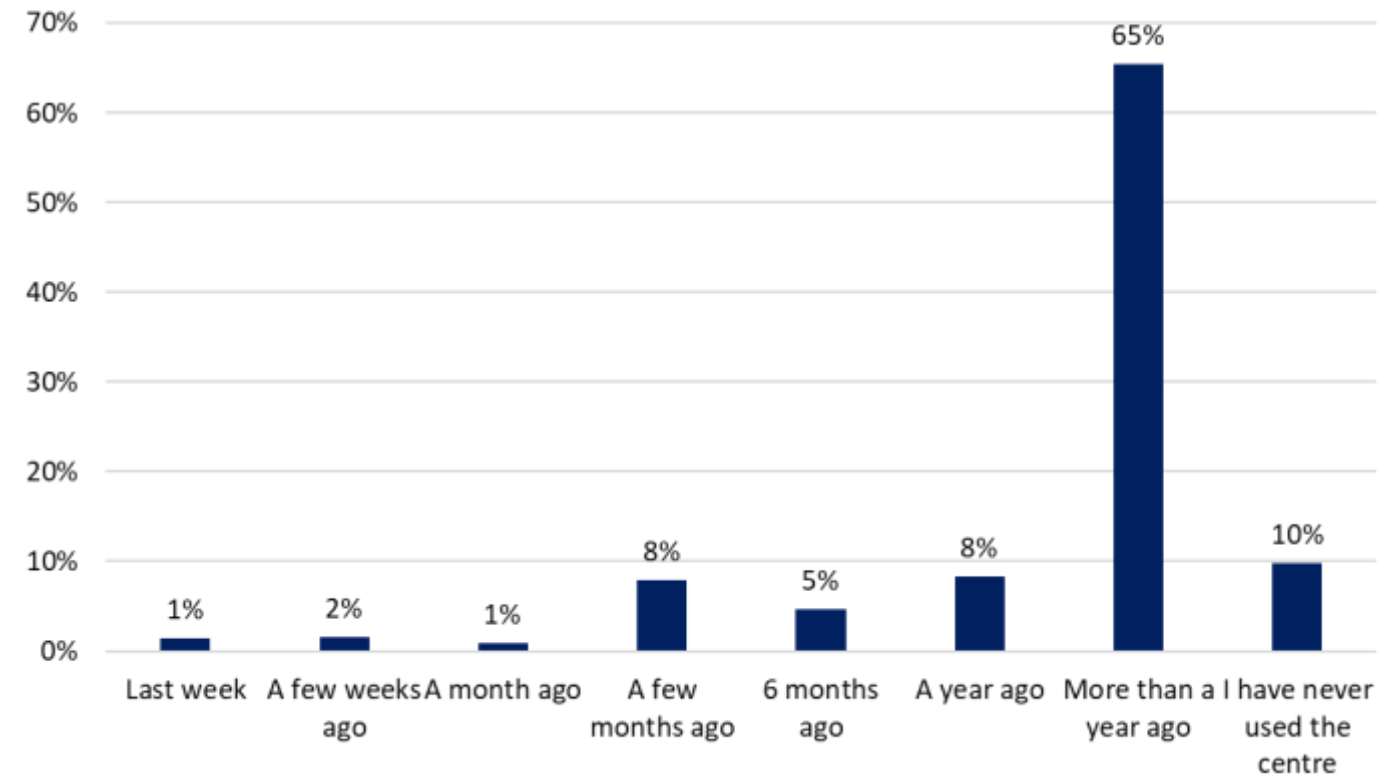
How long would it typically take you to travel to West Wickham Leisure Centre? (Non users)



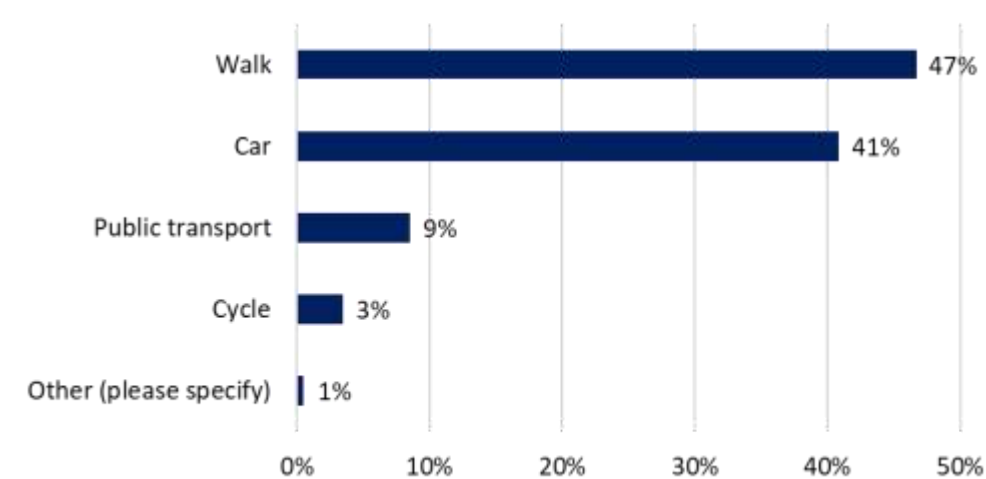
When was the last time you completed any type of moderate exercise/activity? (Non users)



If you have visited the centre previously when was it? (Non users)



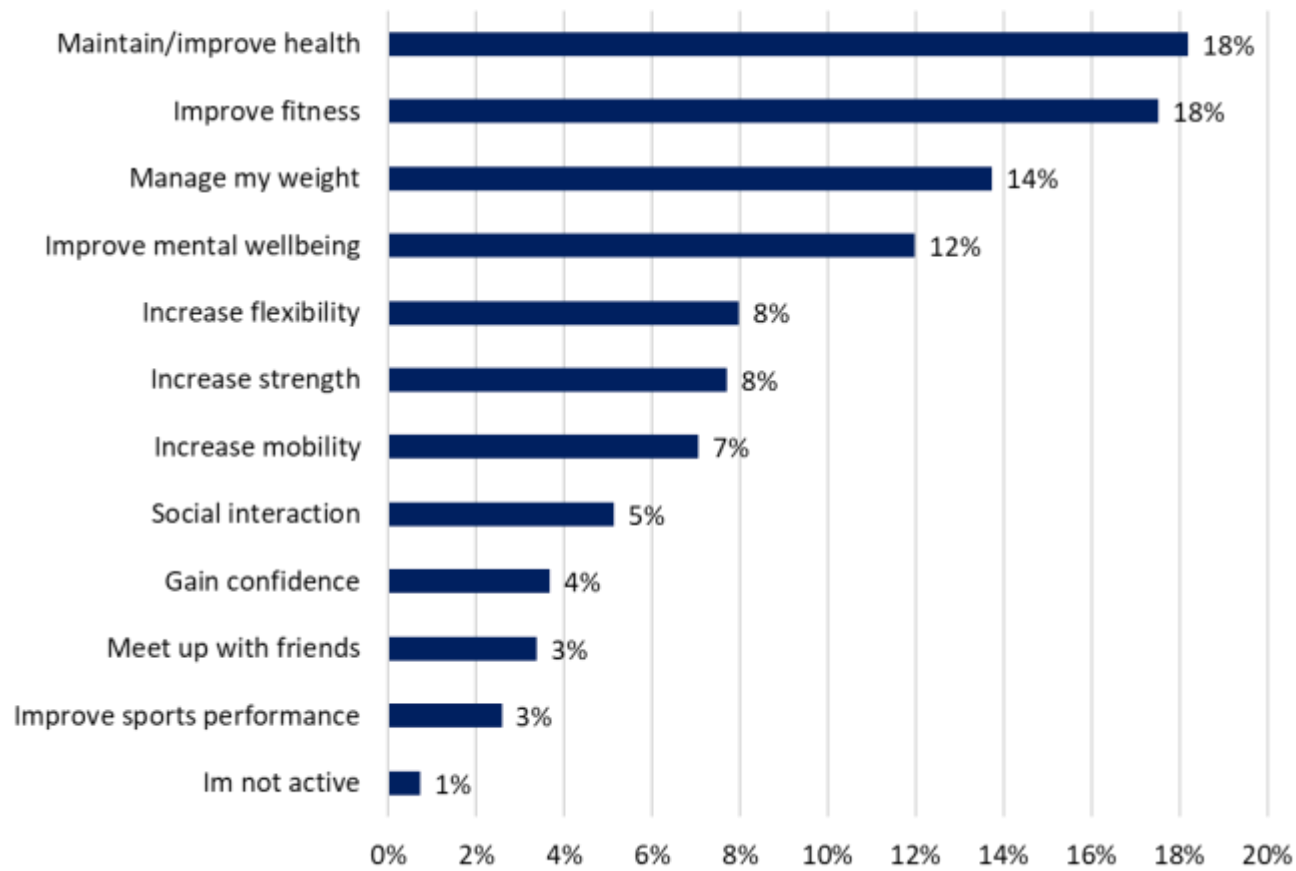
If you were to use the centre how would you get there? (Non users)



Results of the Public Engagement Exercise West Wickham Leisure Centre

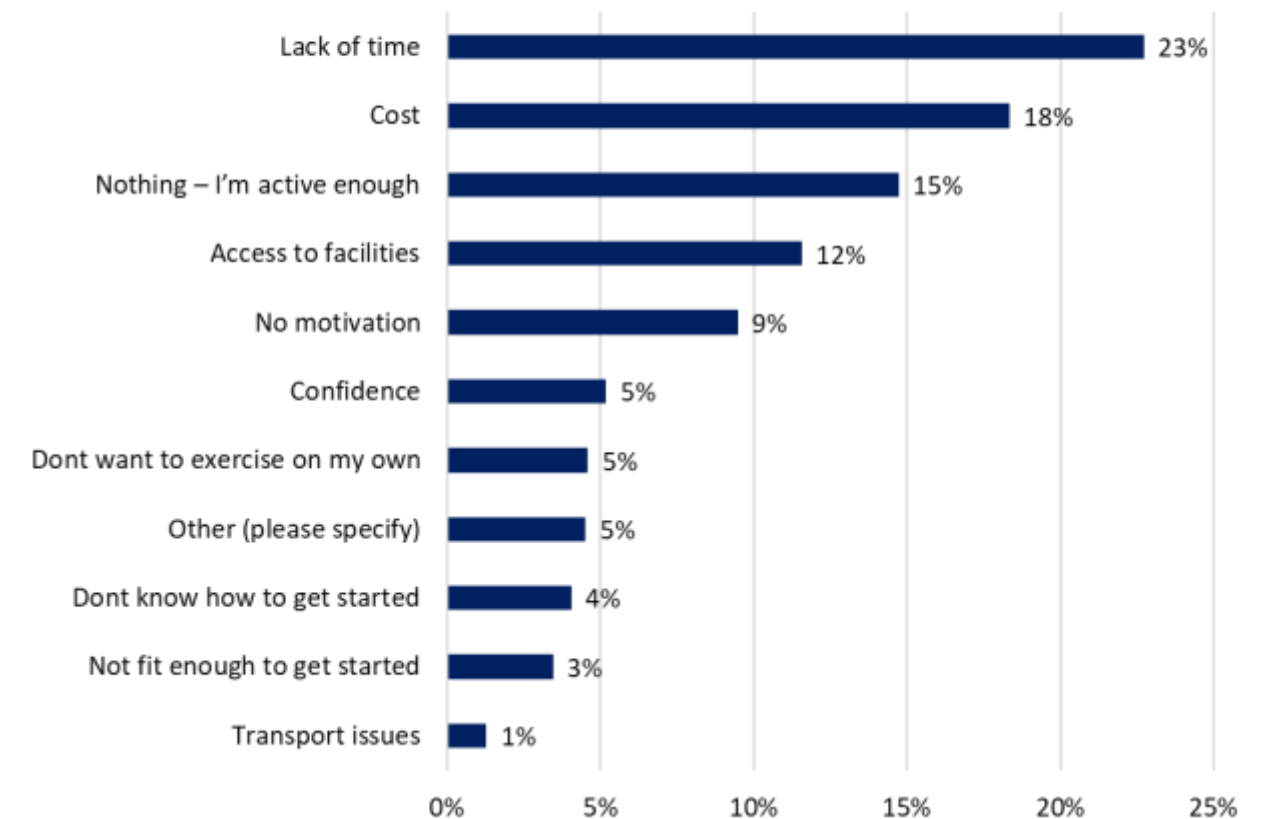
What are your reasons for being active? (Non users)

Participants were asked to select all that apply



What prevents you doing more exercise than you currently do? (Non users)

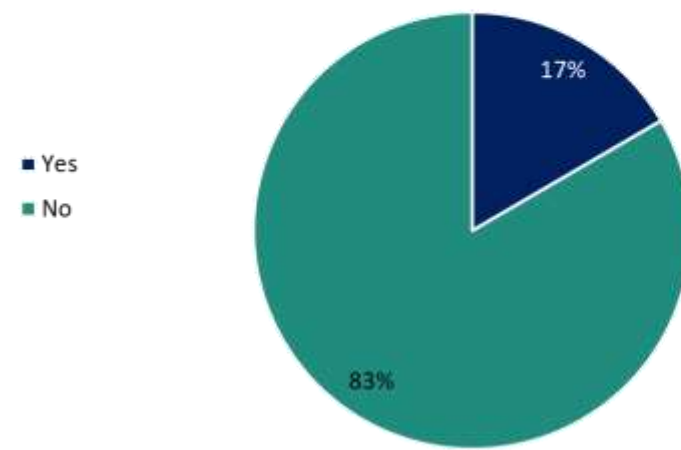
Participants were asked to select all that apply



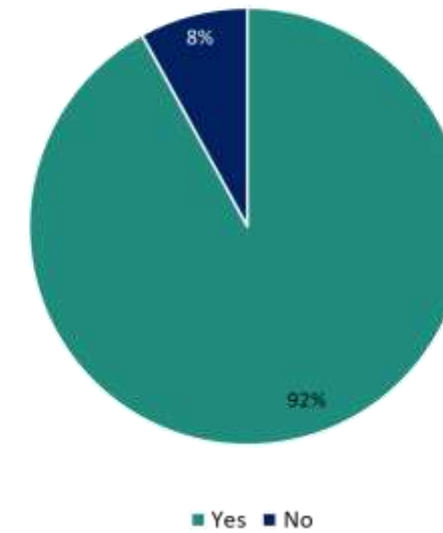
Results of the Public Engagement Exercise

West Wickham Leisure Centre

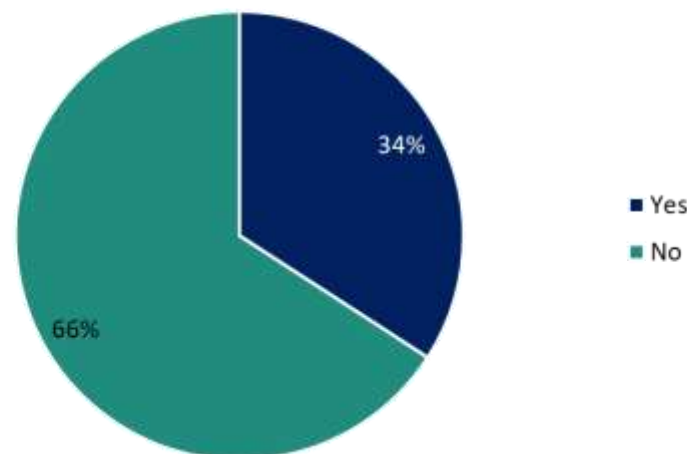
Do you attend a gym or leisure facility on a casual or pay as you go basis?
(Non users)



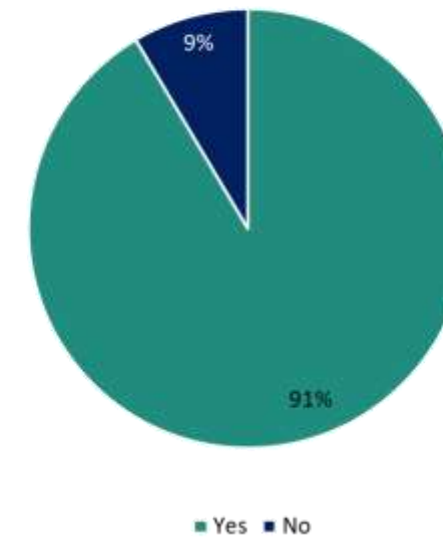
Would a redevelopment of the existing leisure centre encourage you to use the centre more?
(Non users)



Are you currently a member of a gym or leisure facility?
(Non users)



Are you a resident of The London Borough of Bromley?
(Non users)



Executive Summary of the Public Engagement Exercise

WALNUTS - Public Survey Results - What is important to you?					
FITNESS		USERS	NON-USERS	SWIMMING	
Group Cycling Studio		54%	52%	Adult Lane Swimming	58% 54%
Group Exercise Studio		32%	25%	Family Swim Session	53% 39%
Gym		72%	63%	Leamer Pool	56% 45%
Health Improvement Activities		42%	46%	Main Pool	93% 91%
HIIT Studio		32%	25%	Splash Play	41% 26%
Mind & Body		61%	63%	Swimming Clubs	41% 27%
FAMILY		USERS	NON-USERS	SOCIAL & COMMUNITY SPACES	
Children's Parties		55%	48%	Café	93% 94%
Creche		41%	45%	Flexible Working	24% 27%
Sensory Play		46%	45%	Meeting Rooms	22% 27%
Soft Play		85%	78%	Social Events	43% 35%
Water Based Inflatables		67%	59%	WiFi	66% 70%
ACTIVE SENIORS		USERS	NON-USERS		
Power Assisted Equipment		50%	49%		
Social & Group Activities		76%	69%		
Water Based Classes		78%	73%		

Executive Summary

The results of the online surveys have been used by officers and the specialist delivery partner, Alliance Leisure Services, to guide decision making when forming the core requirements for each centre.

The results for the Walnuts were similar to those of West Wickham in that studios, the gym, mind & body facilities, soft play, swimming pools and a cafe were identified as important to a large number of residents while also being achievable within the scope of works. In addition, children's party rooms were recognised as important, most likely due to their provision in the current centre.

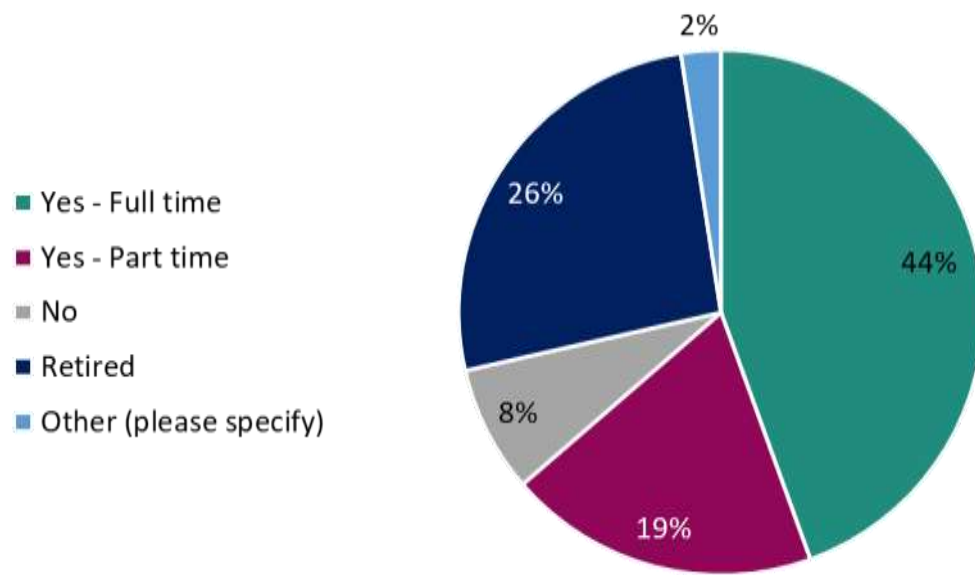
Other high scoring responses, such as water inflatables, water-based classes and Wi-Fi could be offered by the operator in the centre post completion of works.

The engagement campaign also found that many users complained of poor acoustic in the sports hall, lack of dry changing rooms on the ground floor and the poor quality of the wet changing rooms.

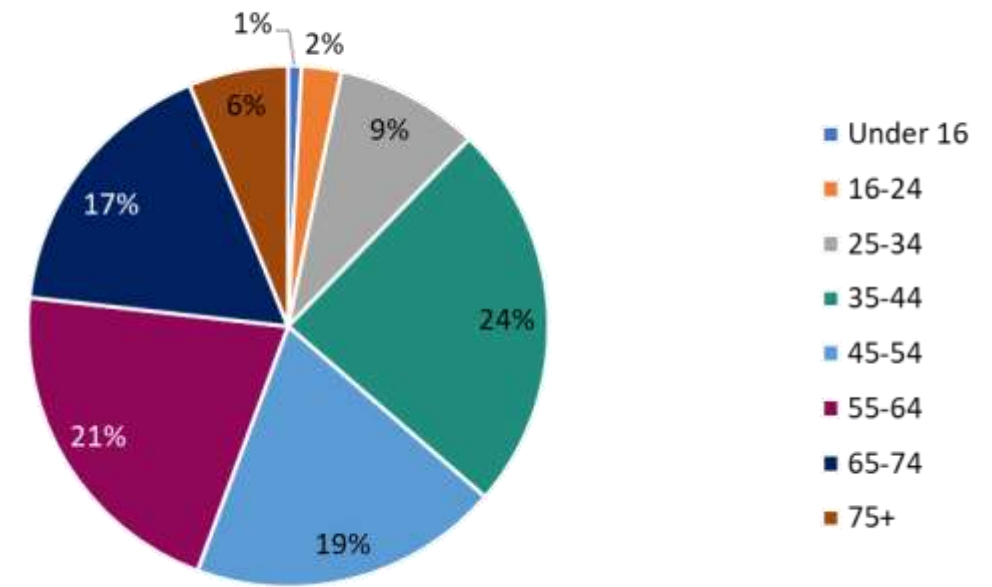
Demographics of the Public Engagement Exercise

Walnuts Leisure Centre

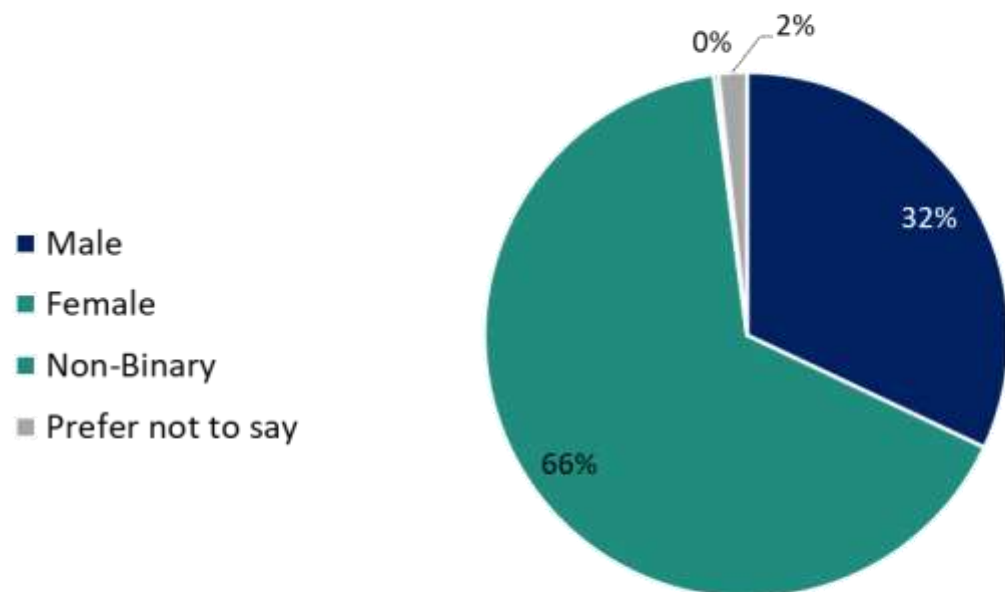
Are you in employment?



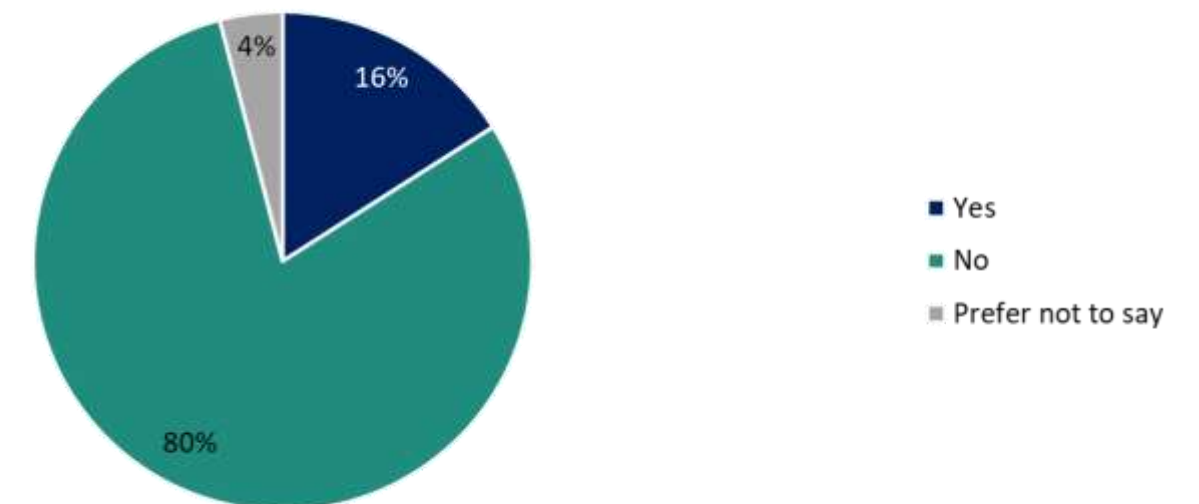
Age:



Gender:



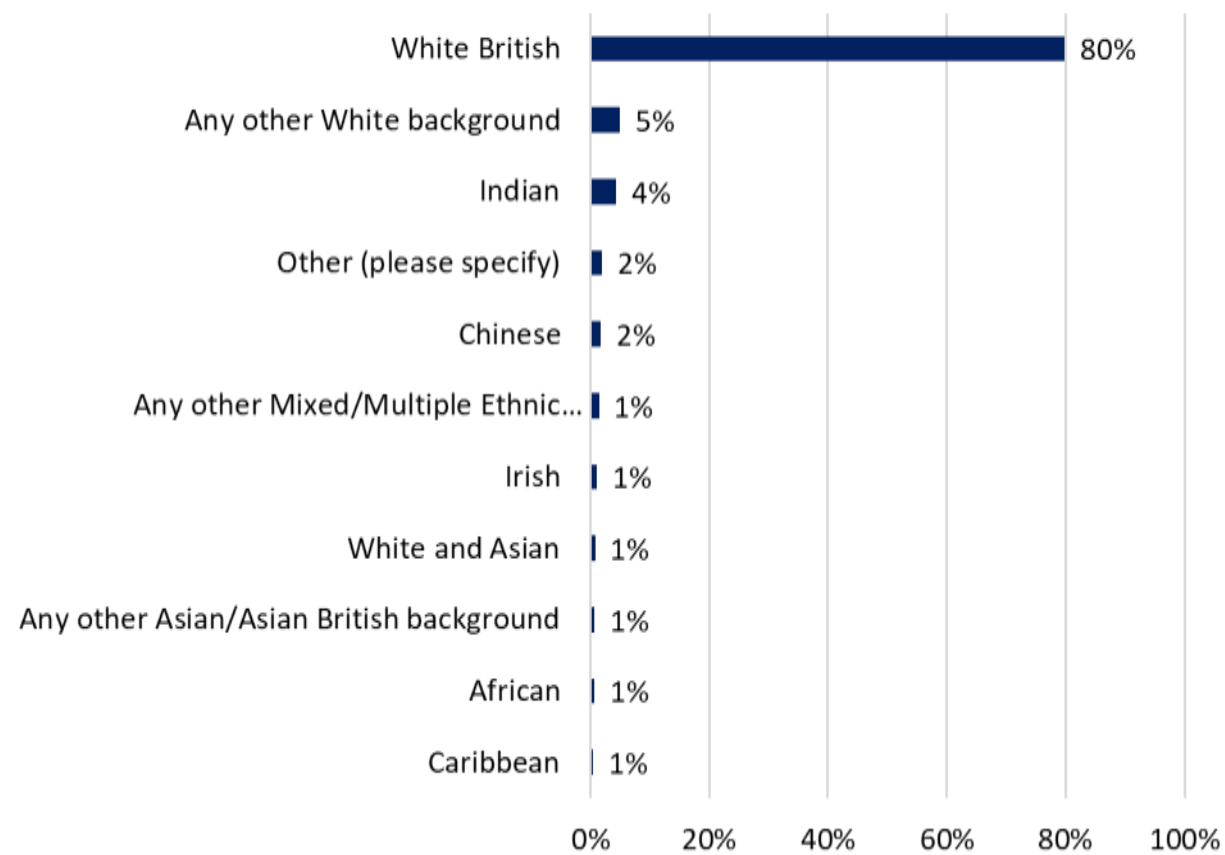
Are your day-to-day activities limited because of a health condition or disability which has lasted, or is expected to last, at least 12 months



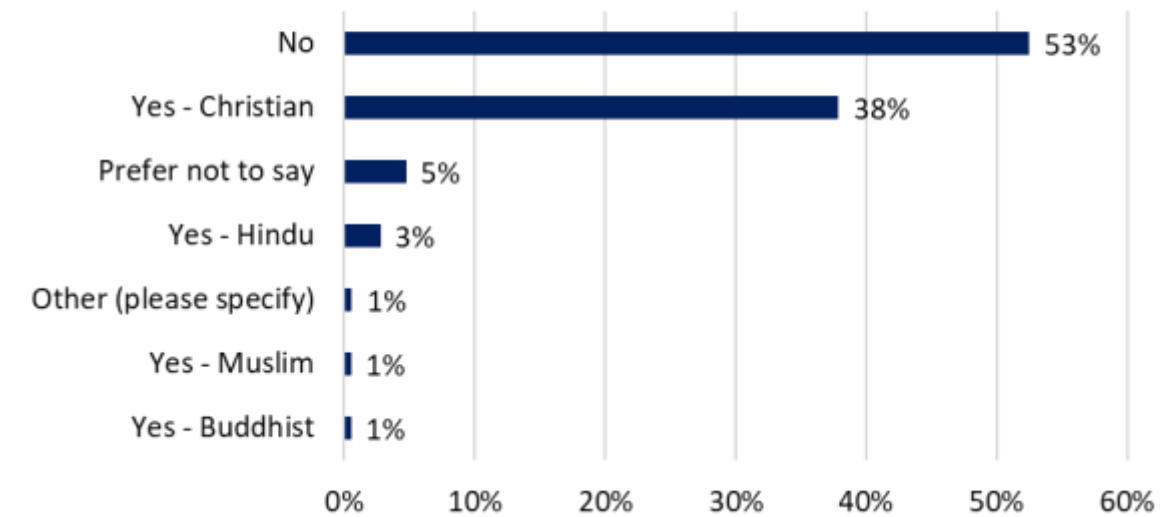
Demographics of the Public Engagement Exercise

Walnuts Leisure Centre

Please indicate to which of these ethnic backgrounds you consider that you belong



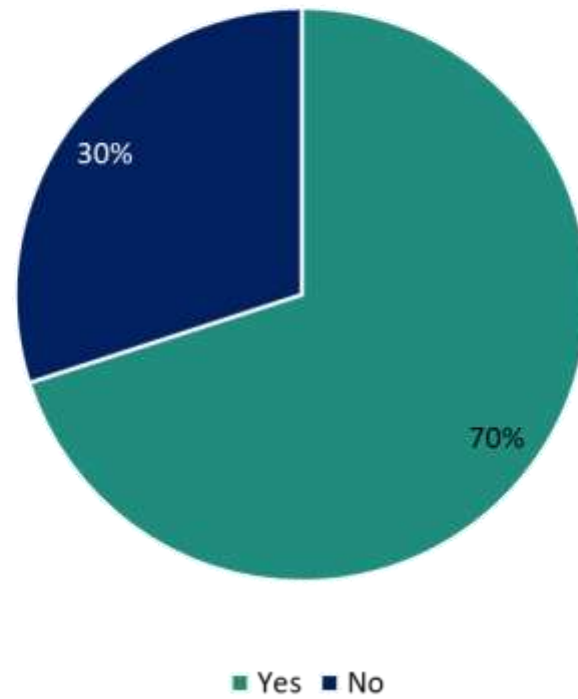
Do you belong to a religion or faith group?



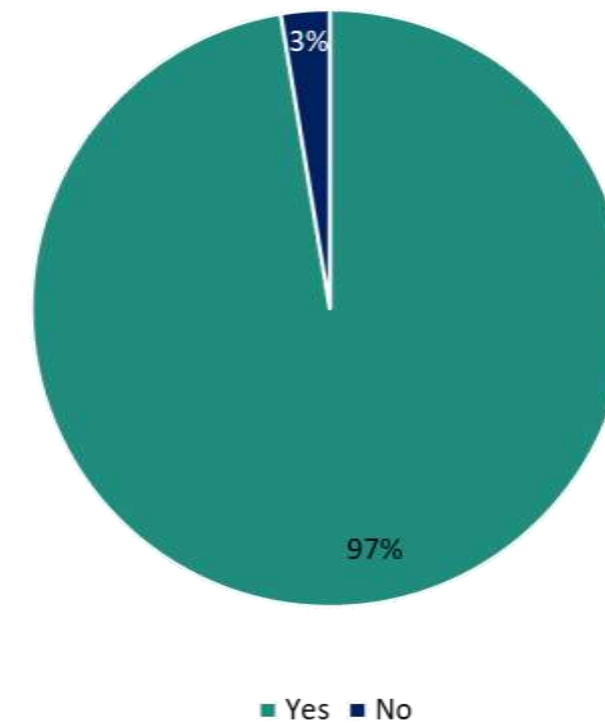
Results of the Public Engagement Exercise

Walnuts Leisure Centre

Do you currently use The Walnuts Leisure Centre?



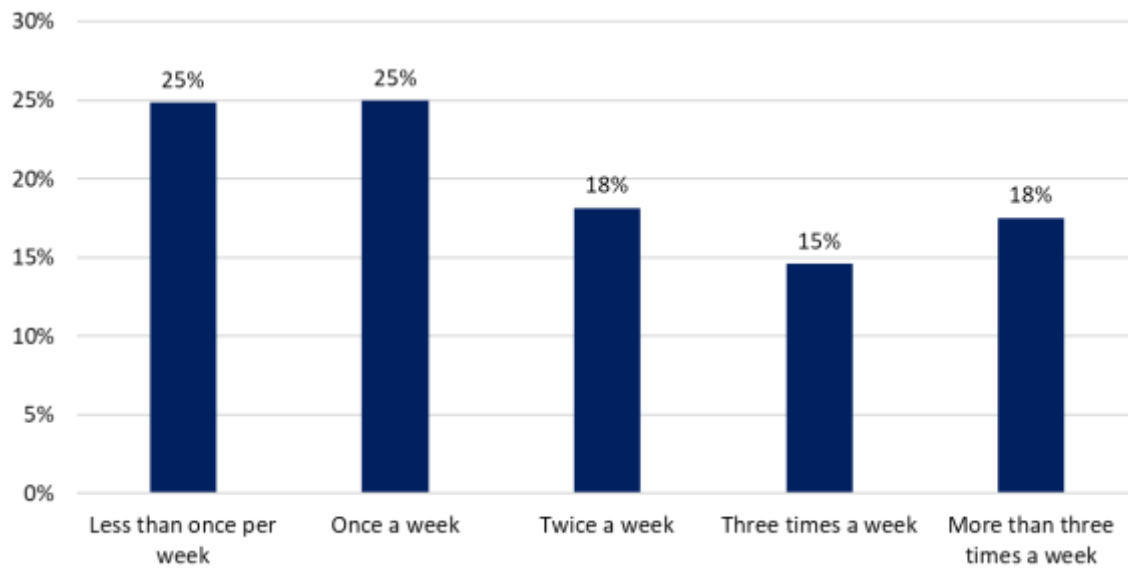
Are you a resident of The London Borough of Bromley? (Users of The Walnuts Leisure Centre)



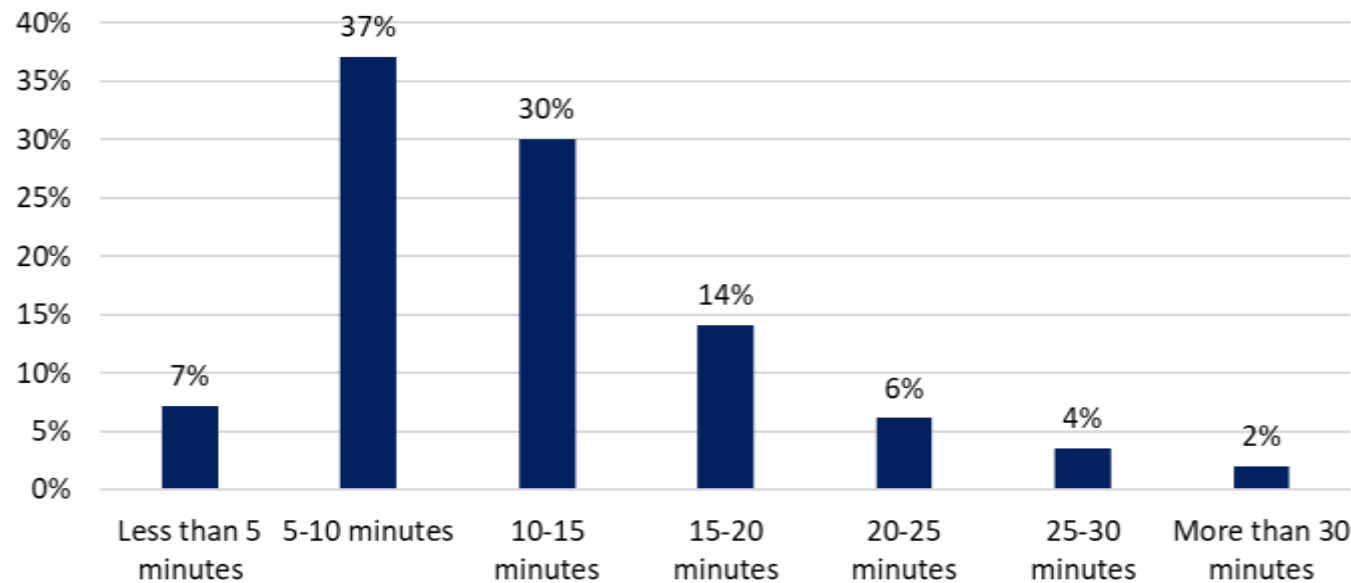
Results of the Public Engagement Exercise

Walnuts Leisure Centre

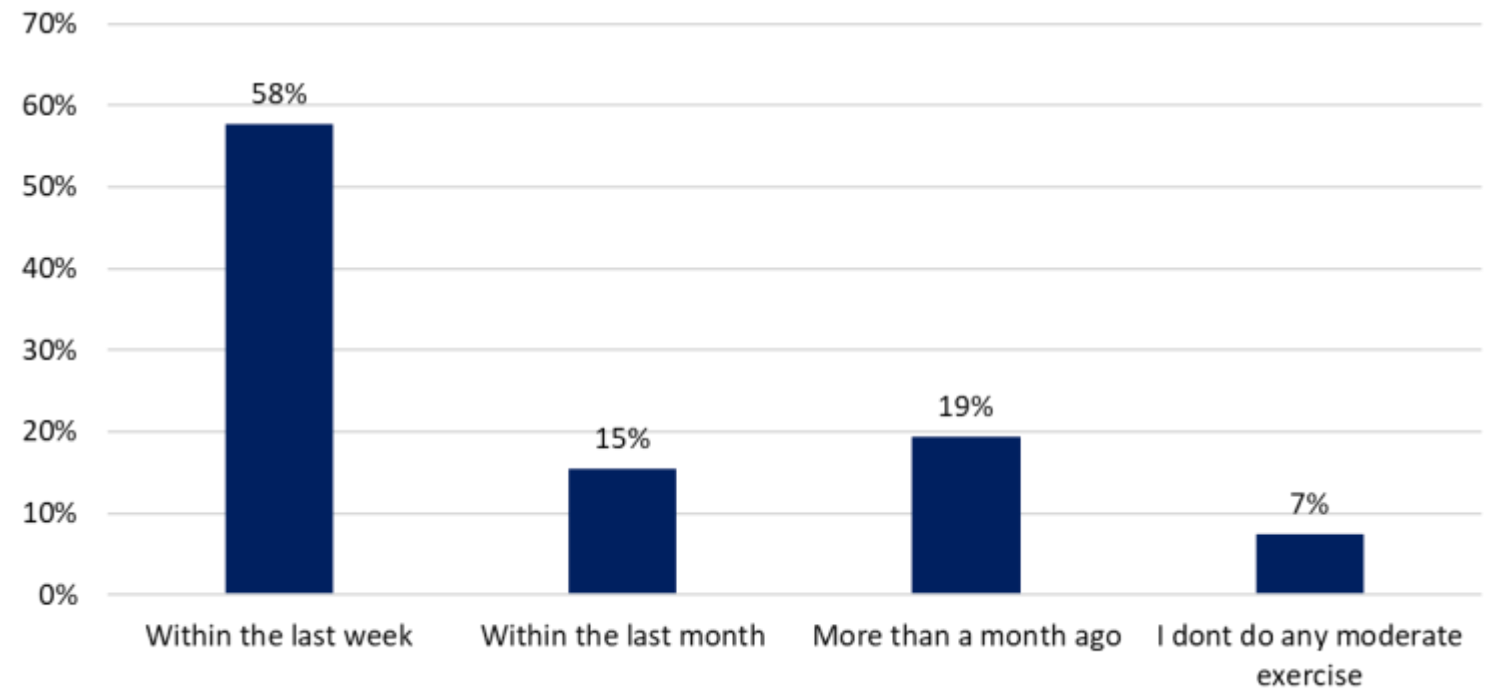
How often do you currently use The Walnuts Leisure Centre?
(Users)



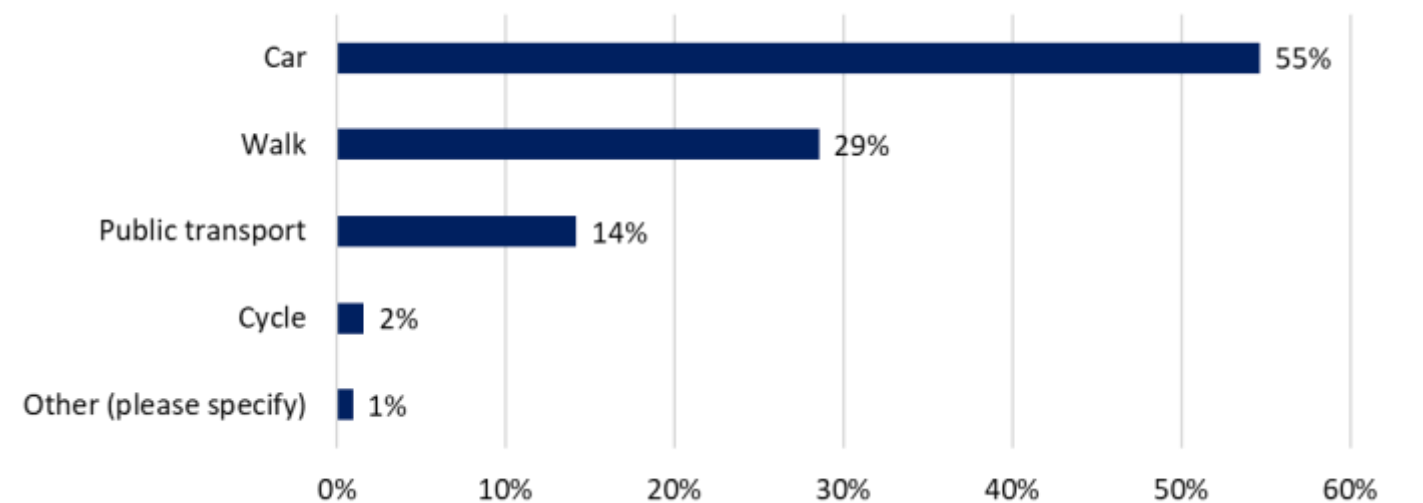
How long does it typically take you to travel to The Walnuts Leisure Centre?
(Users)



When was the last time you completed any type of moderate exercise/activity at The Walnuts Leisure Centre?



How do you travel to The Walnuts Leisure Centre?
(Users)

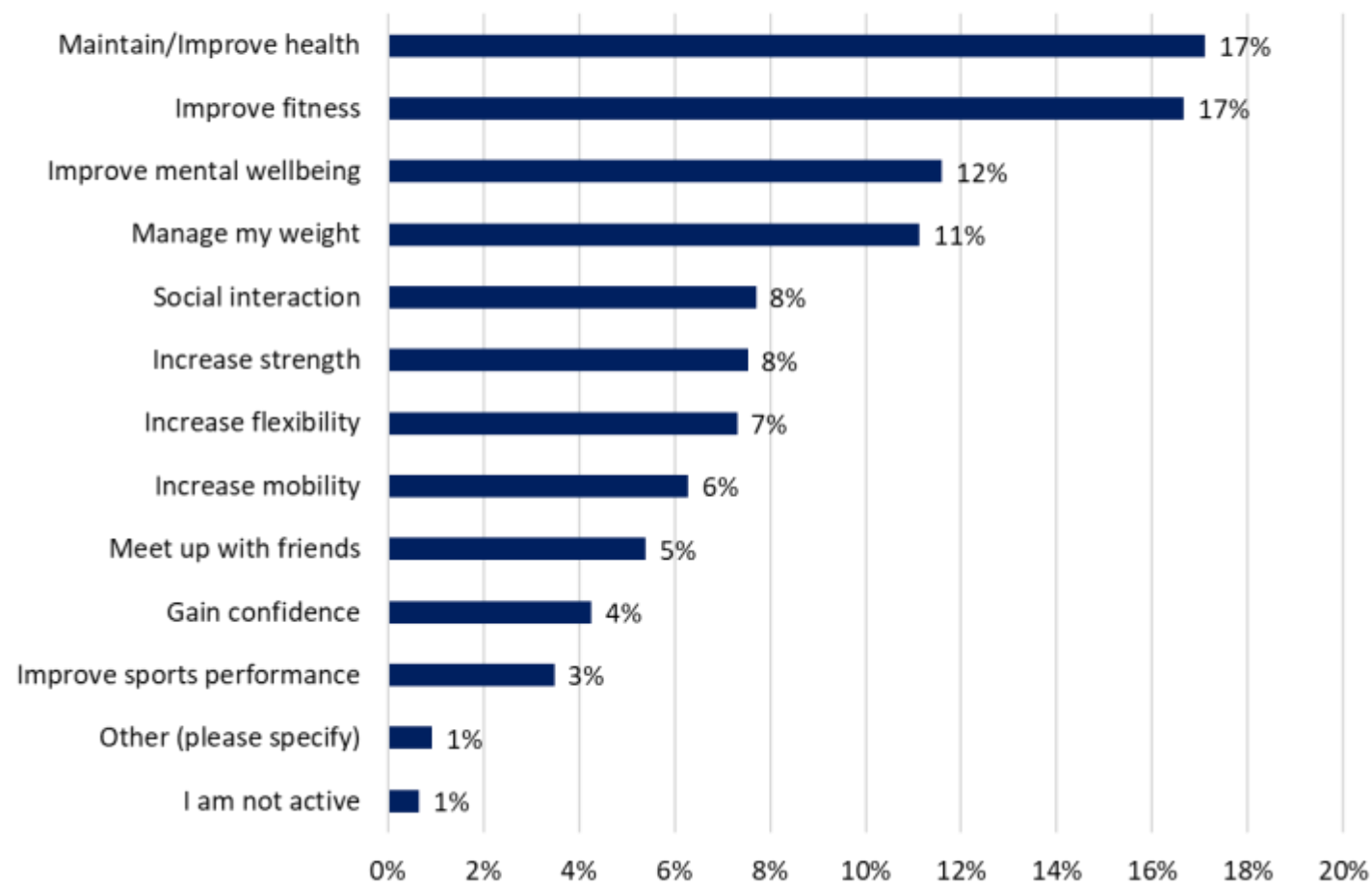


Results of the Public Engagement Exercise

Walnuts Leisure Centre

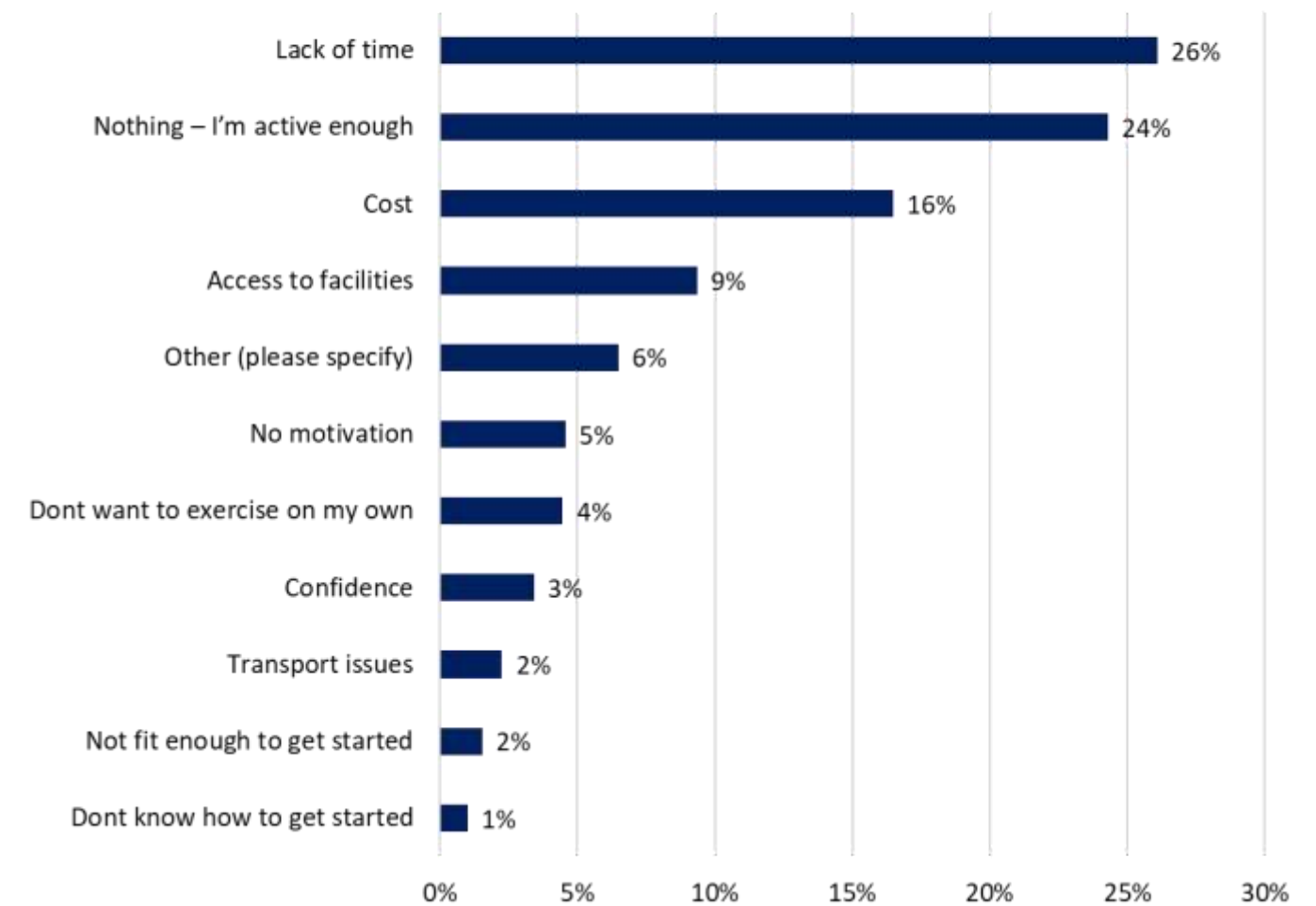
What are your reasons for being active? (Users)

Participants were asked to select all that apply



What prevents you doing more exercise than you currently do? (Users)

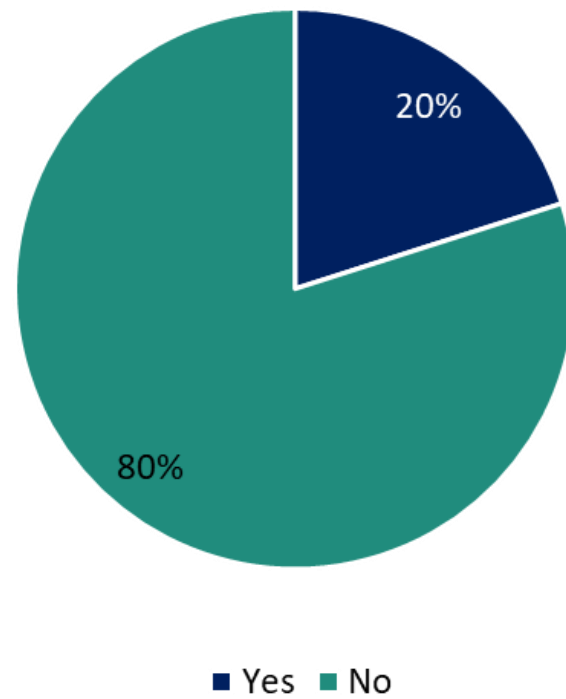
Participants were asked to select all that apply



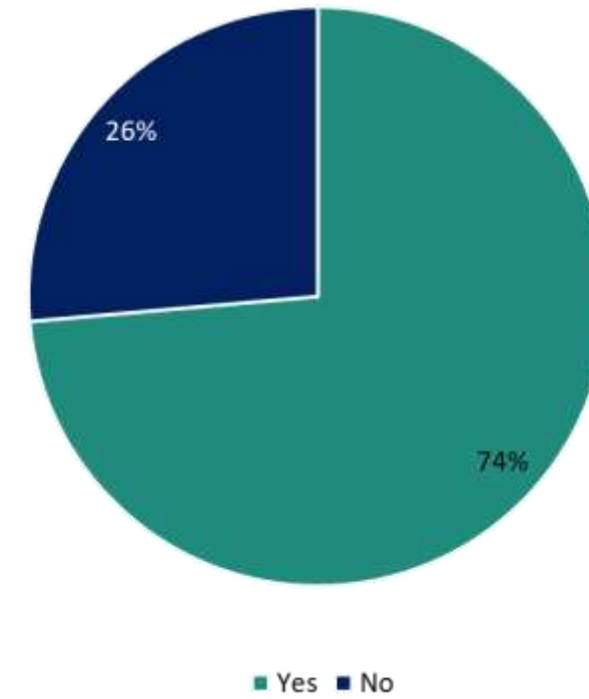
Results of the Public Engagement Exercise

Walnuts Leisure Centre

**Are you currently a member or user of any other fitness or sports clubs?
(Users)**



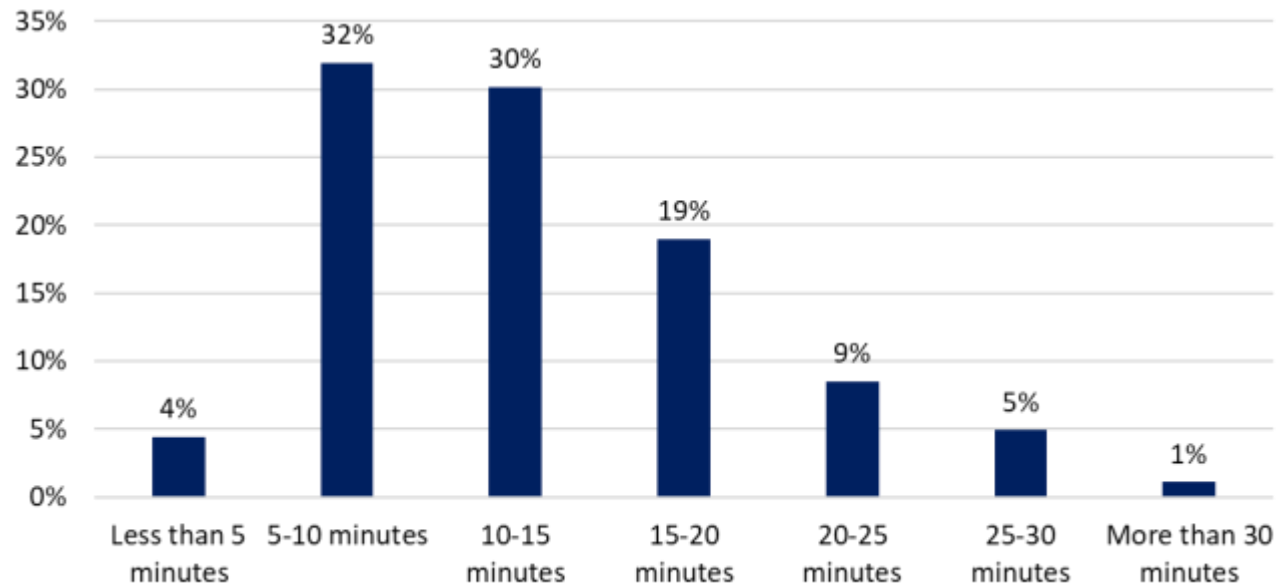
Would a redevelopment of the existing leisure centre encourage you to use the centre more often?



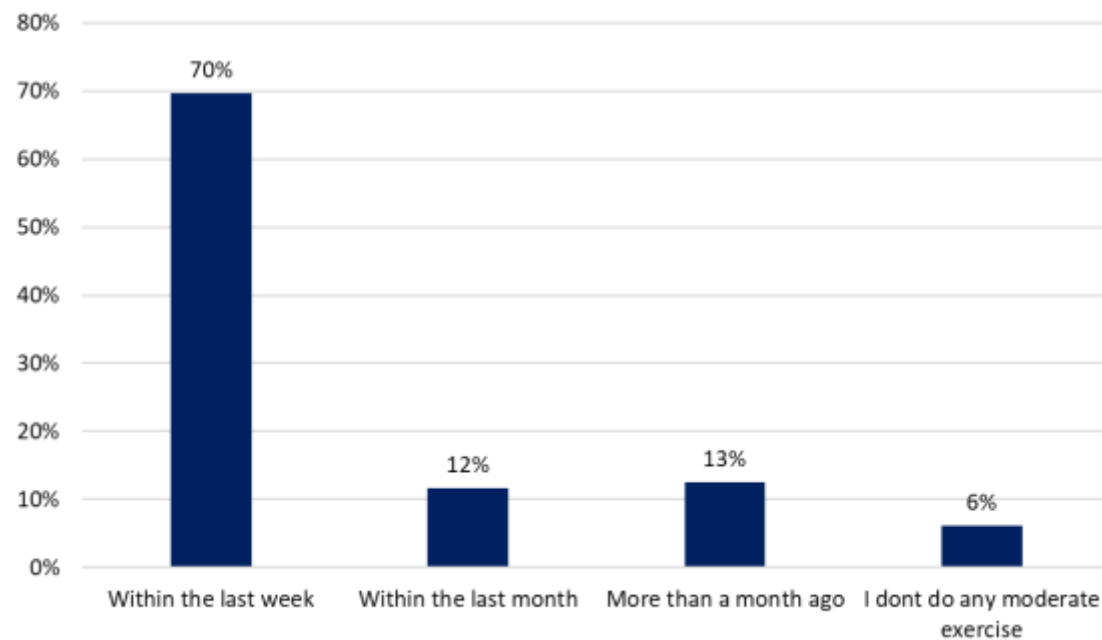
Results of the Public Engagement Exercise

Walnuts Leisure Centre

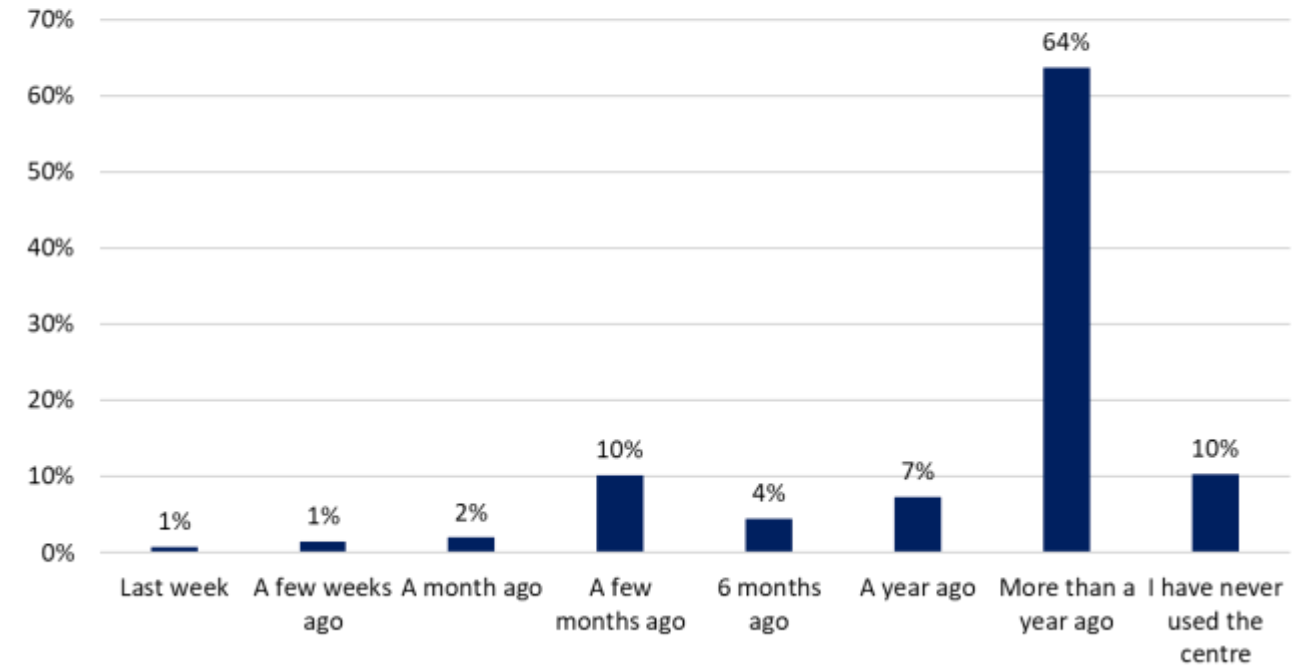
**How long would it typically take you to travel to The Walnuts Leisure Centre?
(Non users)**



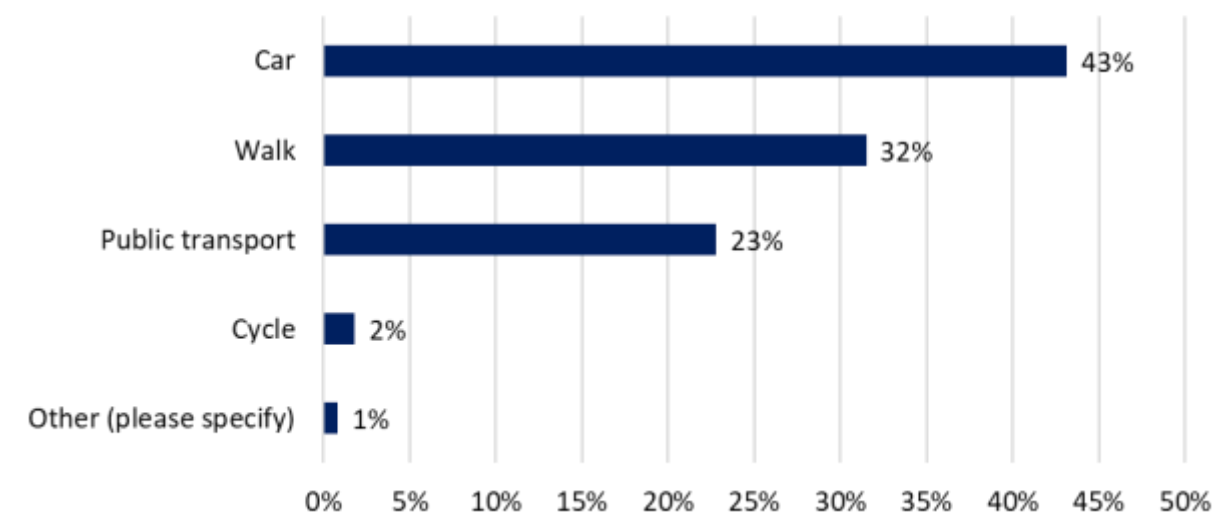
**When was the last time you completed any type of moderate exercise/activity?
(Non users)**



**If you have visited the centre previously when was it?
(Non-users)**



**If you were to use the centre how would you get there?
(Non users)**

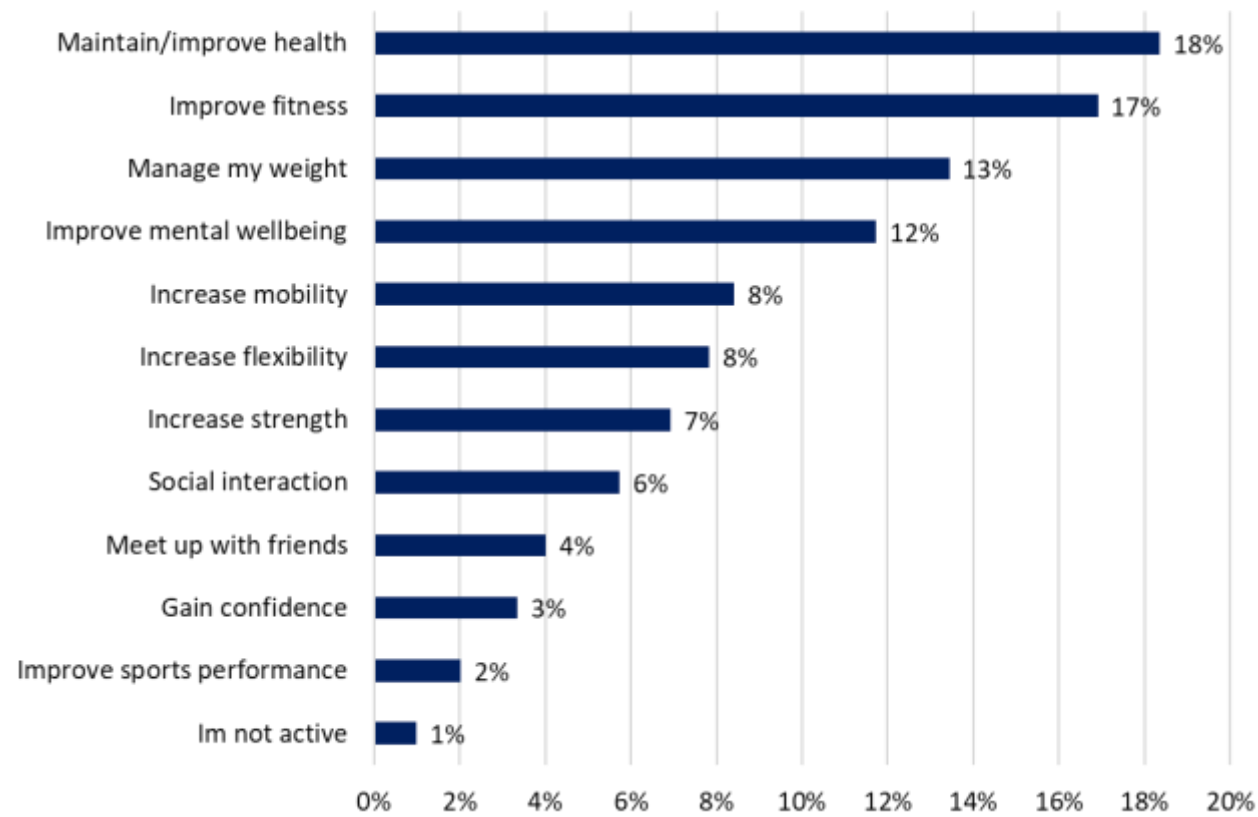


Results of the Public Engagement Exercise

Walnuts Leisure Centre

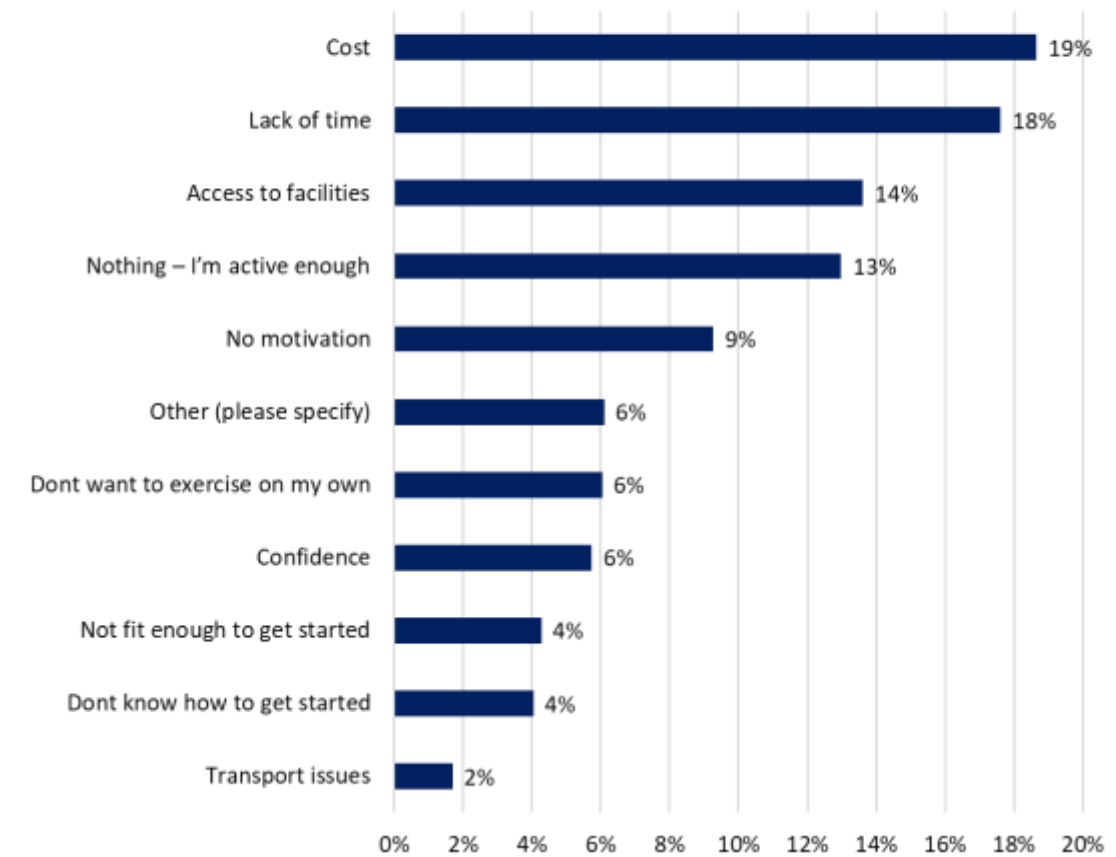
What are your reasons for being active? (Non users)

Participants were asked to select all that apply



What prevents you doing more exercise than you currently do? (Non users)

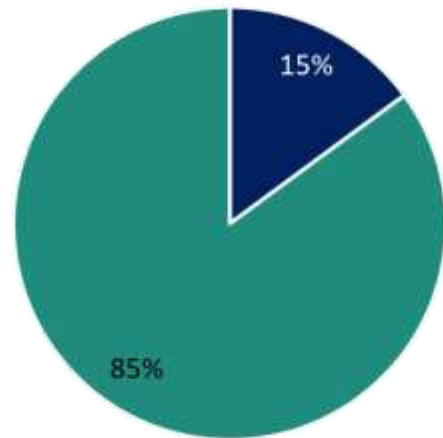
Participants were asked to select all that apply



Results of the Public Engagement Exercise

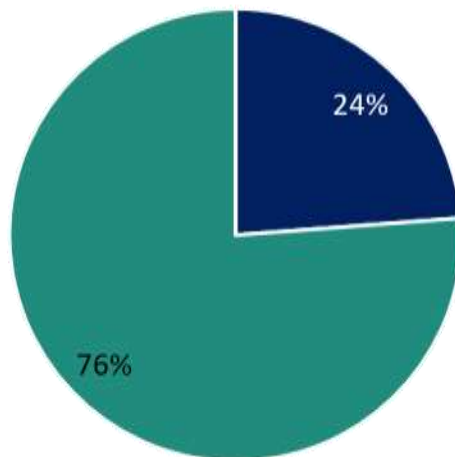
Walnuts Leisure Centre

Do you attend a gym or leisure facility on a casual or pay as you go basis?
(Non users)



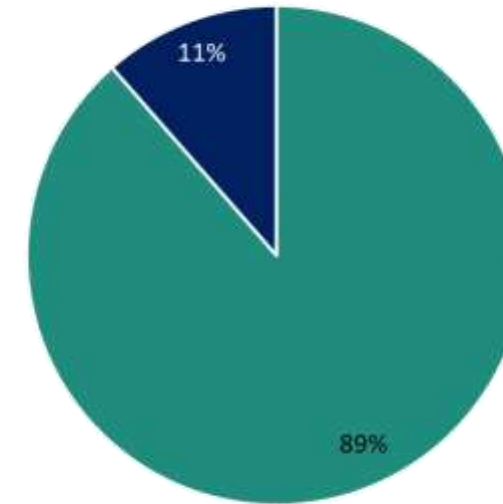
■ Yes ■ No

Are you currently a member of a gym or leisure facility?
(Non users)



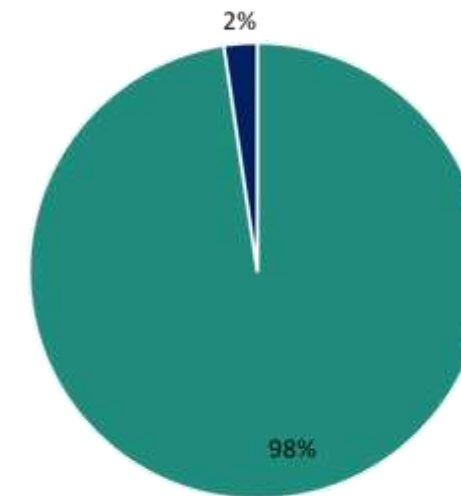
■ Yes ■ No

Would a redevelopment of the existing leisure centre encourage you to use the centre more?
(Non users)



■ Yes ■ No

Are you a resident of The London Borough of Bromley?
(Non users)



■ Yes ■ No

Copy of the Walnuts Survey

The surveys for the Walnuts Leisure Centre and the West Wickham Leisure Centre are identical, other than the differences of facilities offered within the multiple-choice questions.

1. Do you currently use The Walnuts Leisure Centre?

- Yes
- No (Please skip to Q23)

2. Do you live in The London Borough of Bromley?

- Yes
- No

3. How often do you currently use The Walnuts Leisure Centre? (Please tick one box only)

- Less than once per week
- Once a week
- Twice a week
- Three times a week
- More than three times a week

4. How long does it usually take you to travel to The Walnuts Leisure Centre? (Please tick one box only)

- Less than 5 minutes
- 5-10 minutes
- 10-15 minutes
- 15-20 minutes
- 20-25 minutes
- 25-30 minutes
- More than 30 minutes

5. How do you travel to The Walnuts Leisure Centre? (Please tick one box only)

- Walk
- Cycle
- Public transport
- Car
- Other (please specify)

6. What facilities do you use at the current The Walnuts Leisure Centre? (Please tick all that apply)

- Main Pool
- Learner Pool
- Gym
- Exercise Classes
- Studio Cycling
- Soft Play
- Sports Hall
- Squash Courts
- Cafe
- Other (please specify)

7. How would you rate The Walnuts Leisure Centre? (Please tick one box only)

- Very good
- Good
- Acceptable
- Poor

8. When was the last time you completed any type of moderate exercise/activity at The Walnuts Leisure Centre? (Moderate intensity activity will raise your heart rate, and make you breathe faster and feel warmer than normal) (Please tick one box only)

- Within the last week
- Within the last month
- More than a month ago
- I don't do any moderate exercise

9. Why do you choose to exercise? (Please tick all that apply)

- Improve fitness
- Maintain/Improve health
- Improve sports performance
- Increase strength
- Manage my weight
- Increase flexibility
- Gain confidence
- Increase mobility
- Improve mental wellbeing
- Social interaction
- Meet up with friends
- I am not active
- Other (please specify)

10. What stops you doing more exercise than you do now? (Please tick all that apply)

- Nothing I'm active enough
- Cost
- Access to facilities
- Transport issues
- No motivation
- Lack of time
- Don't want to exercise on my own
- Confidence
- Don't know how to get started
- Not fit enough to get started
- Other (please specify)

11. Are you currently a member or user of any other fitness or sports clubs?

- Yes
- No (Skip to Q13)

12. If yes, which one/s?

.....

13. Do you attend a leisure centre on a casual or pay-as-you-go basis?

- Yes
- No (Skip to Q15)

14. If yes, which one/s?

.....

15. If The Walnuts were to be upgraded and refurbished, would you want to visit more often?

- Yes (Skip to Q17)
- No

16. Please explain why a refurbishment would not make you want to attend the leisure centre more often.

.....

17. FITNESS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Gym
- Group Exercise Studio
- Group Cycling Studio
- HIIT Studio (High Intensity Interval Training)
- Health Improvement Activities
- Health Improvements (Physiotherapy or Rehabilitation)
- Mind & Body (Yoga/Pilates)
- These are not important to me
- Other (please specify)

18. SWIMMING: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Main Pool
- Learner Pool
- Adult Lane Swimming
- Family Swimming Sessions
- Swimming Clubs
- Splash Play
- These are not important to me
- Other (please specify)

19. FAMILY: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Soft Play
- Sensory Play (such as sensory lights/music therapy/activities experienced through a child's senses)
- Water Based Inflatables
- Creche
- Children's Parties
- These are not important to me
- Other (please specify)

20. ACTIVE SENIORS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Power Assisted Equipment/Toning
- Water Based Classes
- Social and Group Activities
- These are not important to me
- Other (please specify)

21. SPORTS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Badminton
- Squash
- Table Tennis
- Gymnastics
- Five-a-Side Football
- Basketball
- Netball

22. SOCIAL/COMMUNITY SPACES: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Cafe
- Meeting Rooms
- Wi-Fi
- Social Events
- Flexible Working
- These are not important to me
- Other (please specify)

PLEASE SKIP TO QUESTION 42

23. If you have visited the centre before, when was it? (Please tick one box only)

- Last week
- A few weeks ago
- A month ago
- A few months ago
- 6 months ago
- A year ago
- More than a year ago
- I have never used the centre

24. Do you live in The London Borough of Bromley?

- Yes
- No

25. If you were to use the centre, how would you get there? (Please tick one box only)

- Walk
- Cycle
- Public transport
- Car
- Other (please specify)

26. How long would it take you to travel to The Walnuts Leisure Centre? (Please tick one box only)

- Less than 5 minutes
- 5-10 minutes
- 10-15 minutes
- 15-20 minutes
- 20-25 minutes
- 25-30 minutes
- More than 30 minutes

27. When was the last time you completed any type of moderate exercise/activity at The Walnuts Leisure Centre? (Moderate intensity activity will raise your heart rate, and make you breathe faster and feel warmer than normal) (Please tick one box only)

- Within the last week
- Within the last month
- More than a month ago
- I don't do any moderate exercise

28. Why do you choose to exercise? (Please tick all that apply)

- Improve fitness
- Maintain/Improve health
- Improve sports performance
- Increase strength
- Manage my weight
- Increase flexibility
- Gain confidence
- Increase mobility
- Improve mental wellbeing
- Social interaction
- Meet up with friends
- I am not active
- Other (please specify)

29. What stops you doing more exercise than you do now? (Please tick all that apply)

- Nothing, I'm active enough
- Cost
- Access to facilities
- Transport issues
- No motivation
- Lack of time
- Don't want to exercise on my own
- Confidence
- Don't know how to get started
- Not fit enough to get started
- Other (please specify)

30. Are you currently a member or user of any other fitness or sports clubs?

- Yes
- No (Skip to Q32)

31. If yes, which one/s?

.....

32. Do you attend a leisure centre on a casual or pay-as-you-go basis?

- Yes
- No (Skip to Q34)

33. If yes, which one/s?

.....

34. If The Walnuts were to be upgraded and refurbished, would you want to visit more often?

- Yes (Skip to Q36)
- No

35. Please explain why a refurbishment would not make you want to attend the leisure centre more often.

.....

36. FITNESS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Gym
- Group Exercise Studio
- Group Cycling Studio
- HIIT Studio (High Intensity Interval Training)
- Health Improvement Activities
- Health Improvements (Physiotherapy or Rehabilitation)
- Mind & Body (Yoga/Pilates)
- These are not important to me
- Other (please specify)

37. SWIMMING: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Main Pool
- Learner Pool
- Adult Lane Swimming
- Family Swimming Sessions
- Swimming Clubs
- Splash Play
- These are not important to me
- Other (please specify)

38. FAMILY: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Soft Play
- Sensory Play (such as sensory lights/music therapy/activities experienced through a child's senses)
- Water Based Inflatables
- Creche
- Children's Parties
- These are not important to me
- Other (please specify)

39. ACTIVE SENIORS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Power Assisted Equipment/Toning
- Water Based Classes
- Social and Group Activities
- These are not important to me
- Other (please specify)

40. SPORTS: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Badminton
- Squash
- Table Tennis
- Gymnastics
- Five-a-Side Football
- Basketball
- Netball
- Futsal
- These are not important to me
- Other (please specify)

41. SOCIAL/COMMUNITY SPACES: Which of the following would you like to see as part of the upgrade to the leisure centre? (Please tick all that apply)

- Cafe
- Meeting Rooms
- Wi-Fi
- Social Events
- Flexible Working
- These are not important to me
- Other (please specify)

About You

42. What age are you?

- Under 16
- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75+

43. What gender are you?

- Male
- Female
- Non-Binary
- Prefer not to say
- Other (please specify)

44. Are your day-to-day activities limited because of a health condition or disability which has lasted, or is expected to last, at least 12 months (including any conditions related to old age)?

- Yes
- No
- Prefer not to say

45. Are you in employment?

- Yes – Full time
- Yes – Part time
- No
- Retired
- Other (please specify)

46. To help us monitor our equal opportunities policy, please indicate to which of these groups you consider that you belong (Please tick one answer only)

- White British
- Irish
- Gypsy or Irish Traveller
- Any other White background
- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed/Multiple Ethnic background
- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian/Asian British background
- African
- Caribbean
- Any other Black/Black British background
- Arab
- Other (please specify)

47. Do you belong to a religion or faith group?

- No
- Yes – Christian
- Yes - Muslim
- Yes - Buddhist
- Yes - Jewish
- Yes – Sikh
- Yes – Hindu
- Prefer not to say
- Other (please specify)

48. Please provide the first part of your postcode, up to four characters as per the example BR14 3UH, please provide BR14

.....

49. Would you be interested in attending a Focus Group as mentioned at the top of the survey?

- Yes
- Np (Skip to Q52)

50. Would you prefer the Focus Group to be in person or online?

- In person
- Online
- I don't mind

51. Please leave your email address below and someone will be in touch should you be selected (Please note all email addresses will only be held and used for Focus Group purposes and will be deleted afterwards)

.....
.....

52. Would you like to be entered into the prize draw with the chance to win one of six £50 vouchers?

- Yes
- No (Please skip Q53)

53. To be entered into the prize draw, please enter you email address below (Please note all email addresses will only be held and used for prize draw purposes and will be deleted afterwards)

.....

Thank you for completing this survey. Leisure-net Solutions is collecting this data on behalf of The London Borough of Bromley. You can see our privacy policy regarding your data at <https://leisure-net.org/privacy-policy/>

Results of the Focus Groups

Youth Focus Group



Leisure Centre Usage

- The majority of attendees had used either leisure centre with some already being current active users.
- All attendees regardless of current activity levels would like to use the leisure centres more.



Activity Levels – non-users

- All attendees would like to be more active for physical and mental health benefits.
- For those currently not using the facilities at either leisure centre, modernisation of the centres, specifically the gym kit, was an important factor in returning



Barriers

- For West Wickham, the major barrier was the lack of provision for younger children which would enable young parents to exercise or spend time with their children.
- For The Walnuts attendees, cleanliness and an unwelcoming feeling – feeling part of a community was key to these attendees



Additional Facilities

- For West Wickham a soft play would be a welcomed addition.
- For The Walnuts Leisure Centre, an open space, welcoming barrista style café/smoothie bar would encourage attendance – socialising was very important to this stakeholder group
- Yoga, mindfulness and dance were repeatedly cited as important

Results of the Focus Groups

Accessibility Focus Group

Leisure Centre Usage

- All attendees had used The Walnuts or West Wickham in some capacity
- There was a strong desire for more opportunities for members of the community with accessibility requirements
- Some attendees have to travel to other areas for hydrotherapy and easier access to the pool.



Activity Levels – non-users

- Non-users would like to be more active
- Most attendees agreed that the lack of a car park or bus routes (particularly for The Walnuts) contributed to their inactivity



Barriers

- Inaccessible swimming pools were a major barrier – both due to temperature and general access
- Lack of lift at West Wickham
- Acoustics and lighting of the leisure centres can create challenging environments for anyone with neurodiverse conditions
- Lack of meaningful activities



Additional Facilities

- Attendees had many ideas regarding how facilities could be made more accessible including improved lighting, improved access from outside into The Walnuts Leisure Centre and a lift for West Wickham to be able to access the gym.
- Swing to be added to the studio to help with ease of movement
- Improved access to the swimming pools



Results of the Focus Groups

Economic Development Focus Group

What is needed for better integration of the Walnuts into the town centre?

- Wayfinding needs to be really clear, with integration of signage into the town centre and from the train station.
- It was felt that the exterior of building requires attention to make it more inviting and welcoming.
- The entrance is unclear and dark, and it was felt that the entrance needs to be moved.
- In terms of lighting, it was commented that the leisure centre external surrounds can be very dark and intimidating.



How do you think this project can maximise business supply chain opportunities, jobs and skills?

- Asking the contractor to take a “local first” approach.
- Looking at sustainability with a real partnership/ collaboration approach.



What support would you require during any redevelopment project?

- Mitigation of disruption to business and local community is essential with clear advance notice of works including overall scope of the works and timelines to ensure minimal disruption to businesses and community being essential.
- The group felt that the development needs to be bold, with efforts to create a sense of pride and excitement in the town centres.



What are the challenges and opportunities of this project to you?

- Dealing with the impact of any delays to these works as they are essential to the town centres.
- Co-location of services was seen as a key opportunity and could bring additional funding.
- All attendees stressed the need to think big and imaginatively to seize the opportunity that this development could bring.



Results of the Focus Groups

Walnuts Public Focus Group



Leisure Centre Usage

- The vast majority of attendees were current users
- For those who weren't current users, they had used the Walnuts Leisure Centre in some capacity previously
- All attendees knew of someone using the facilities



Activity Levels – non-users

- Non-users would like to be more active
- Attendees to the focus groups has used other facilities such as The Pavilion and Spa
- All non-users would consider using the Walnuts Leisure Centre if it was invested in and modernised

Barriers

- A major barrier to use was how dated and unreliable the centre had become (boiler issues).
- Group exercise classes are incredibly popular but due to limited space/capacity, a number of attendees were unable to participate in classes
- A common operational comment was how the general upkeep and maintenance of facilities had fallen below acceptable standards



Additional Facilities

- Attendees would like to see more group exercise classes available – including Pilates, Yoga and Spinning
- Climbing facilities was a popular suggestion
- Activities for juniors aged 11-15 years
- Improved café area to cater for wider audience (families, professionals)
- Slides / splash area within the swimming pool



Results of the Focus Groups

West Wickham Public Focus Group



Leisure Centre Usage

- The vast majority of attendees were current users
- For those who weren't current users, they had used West Wickham in some capacity previously
- All attendees knew of someone using the facilities
- The pool was a key focus for leisure centre users



Activity Levels – non-users

- Non-users would like to be more active
- Non-users were active mainly outside through walking, cycling or outdoor gyms in parks
- Non-users would consider using West Wickham Leisure Centre in some capacity if it was invested in and modernised

Barriers

- A major barrier to use of the gym was the age of the equipment
- Group exercise classes are incredibly popular but due to limited space/capacity, a number of attendees were unable to participate in classes
- The general upkeep and maintenance of facilities was considered poor
- Changing rooms are dated and require investment



Additional Facilities

- Attendees would like to see more group exercise classes available – including Pilates, Yoga and Spinning
- Attendees did not want the length of the pool to be reduced, suggestions of a boom and moveable floor to cater for more usage
- Junior activities were important to attendees
- Café / social space



Leisure Centre Major Works Core Requirements

Appendix B

Contents



1	West Wickham Leisure Centre	Core Requirements.....	45
2	Walnuts Leisure Centre	Core Requirements.....	57

Improving the Facilities Available

Membership, Soft Play and Café Potential

A competition and opportunity analysis conducted by our consultants revealed that investing in the facilities would increase membership numbers, and thus membership revenue, by over £500,000 per year, supporting the Council's aims to draw a rental income from the facilities.

The number of pay-as-you-go users are also expected to increase following a redevelopment, providing additional income growth across both centres.

Both sites have over 250k under-14s within a 30-minute catchment. West Wickham alone has over 100k under-14s within a 15-minute catchment.

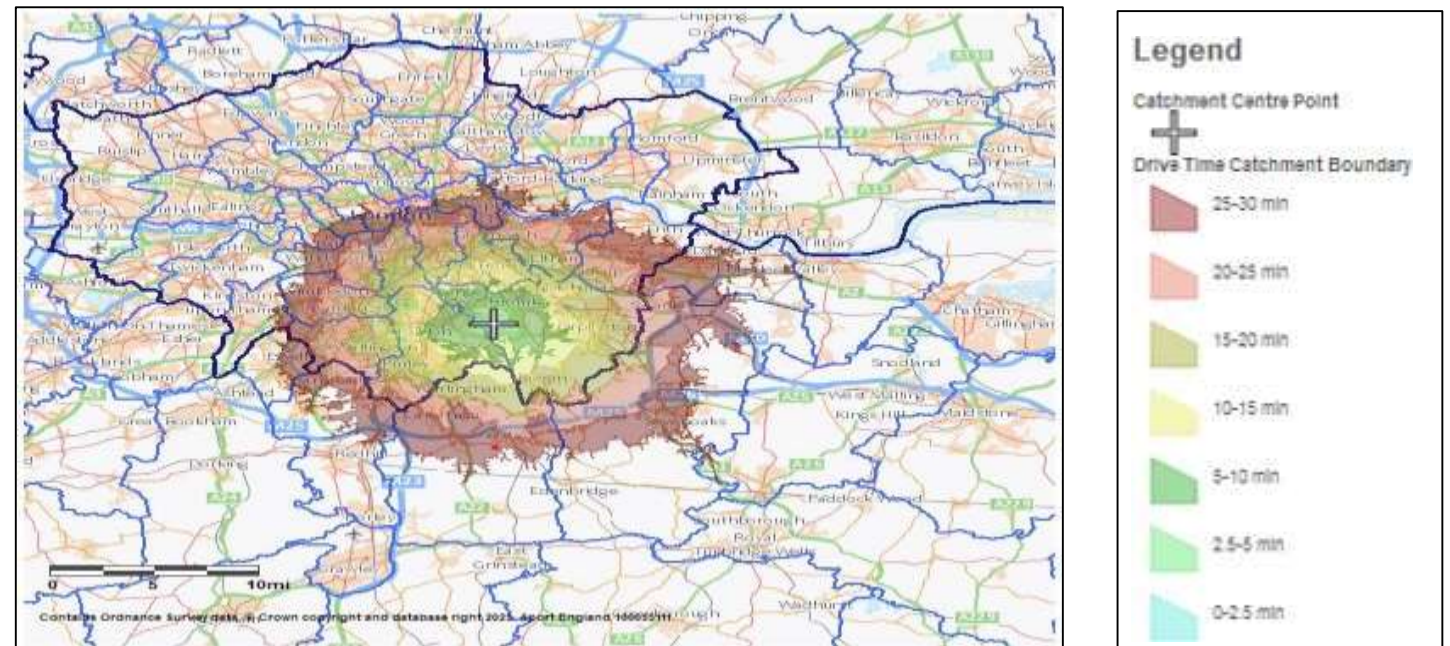
Our survey found that 85% of family users of The Walnuts rated the provision of soft play facilities as important to them.

There was also strong demand for soft play facilities at West Wickham despite this currently not being available, demonstrating the potential for a strong soft play offering at each site.

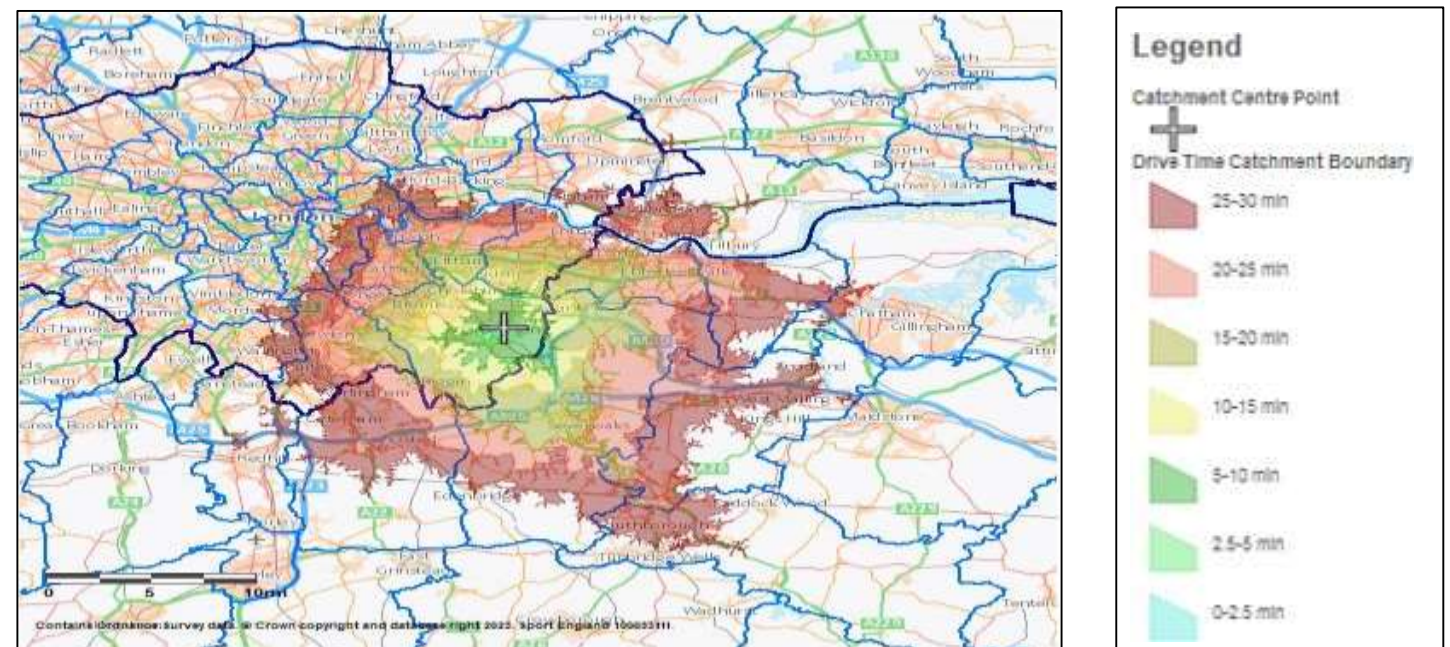
Quality food and drink services provide modern leisure centres with a healthy source of income, increasing the potential rental yield.

Our survey found that, across both sites, over 90% of users and non-users interested in social and community spaces rated the provision of café services as important to them, providing a strong argument for improving (Walnuts) and providing (West Wickham) these services within our leisure centres.

West Wickham Leisure Centre Catchment:



Walnuts Leisure Centre Catchment:





West Wickham Leisure Centre Core Requirements

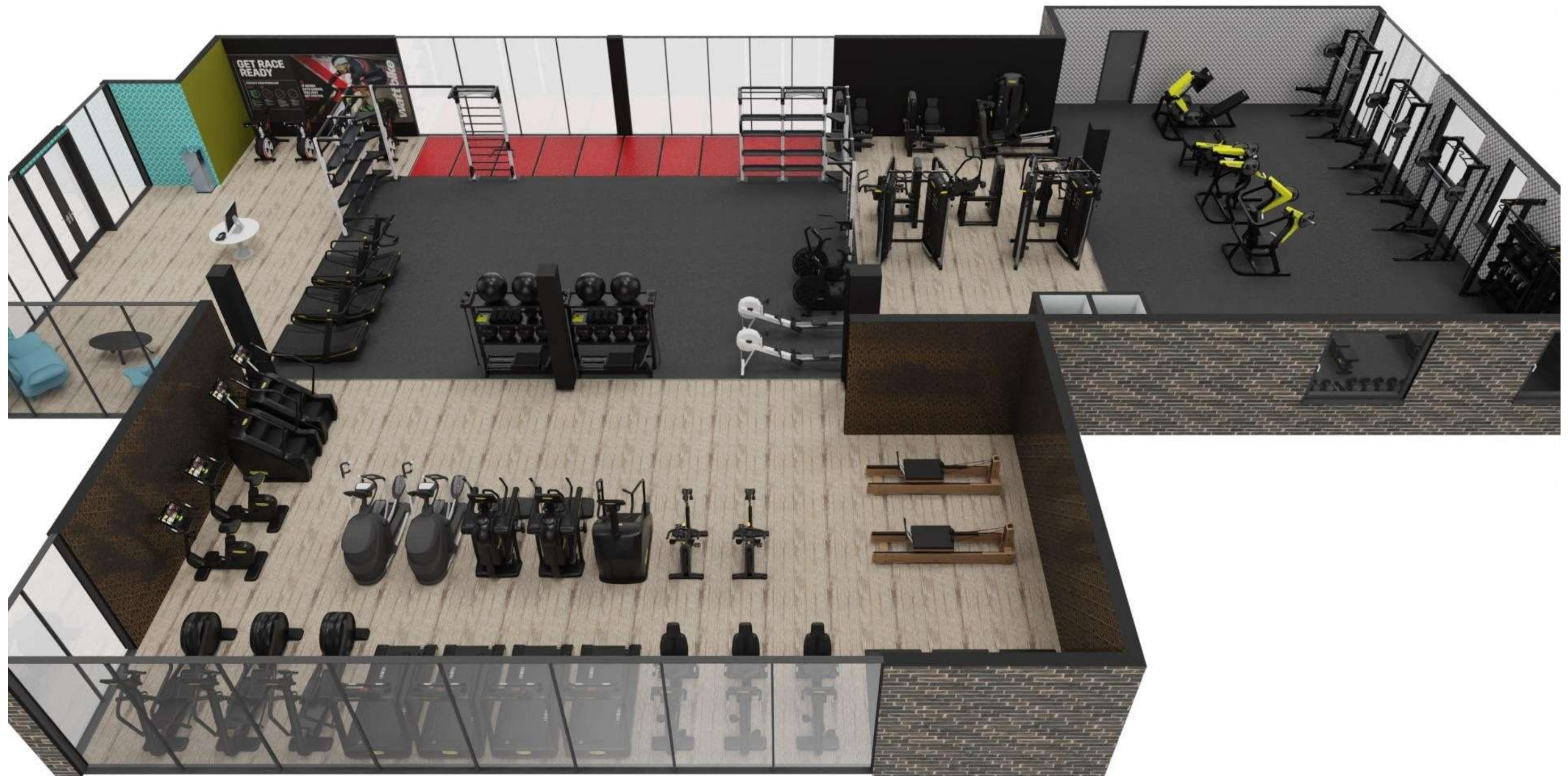
Reception and Café – 3D Visuals

West Wickham Leisure Centre



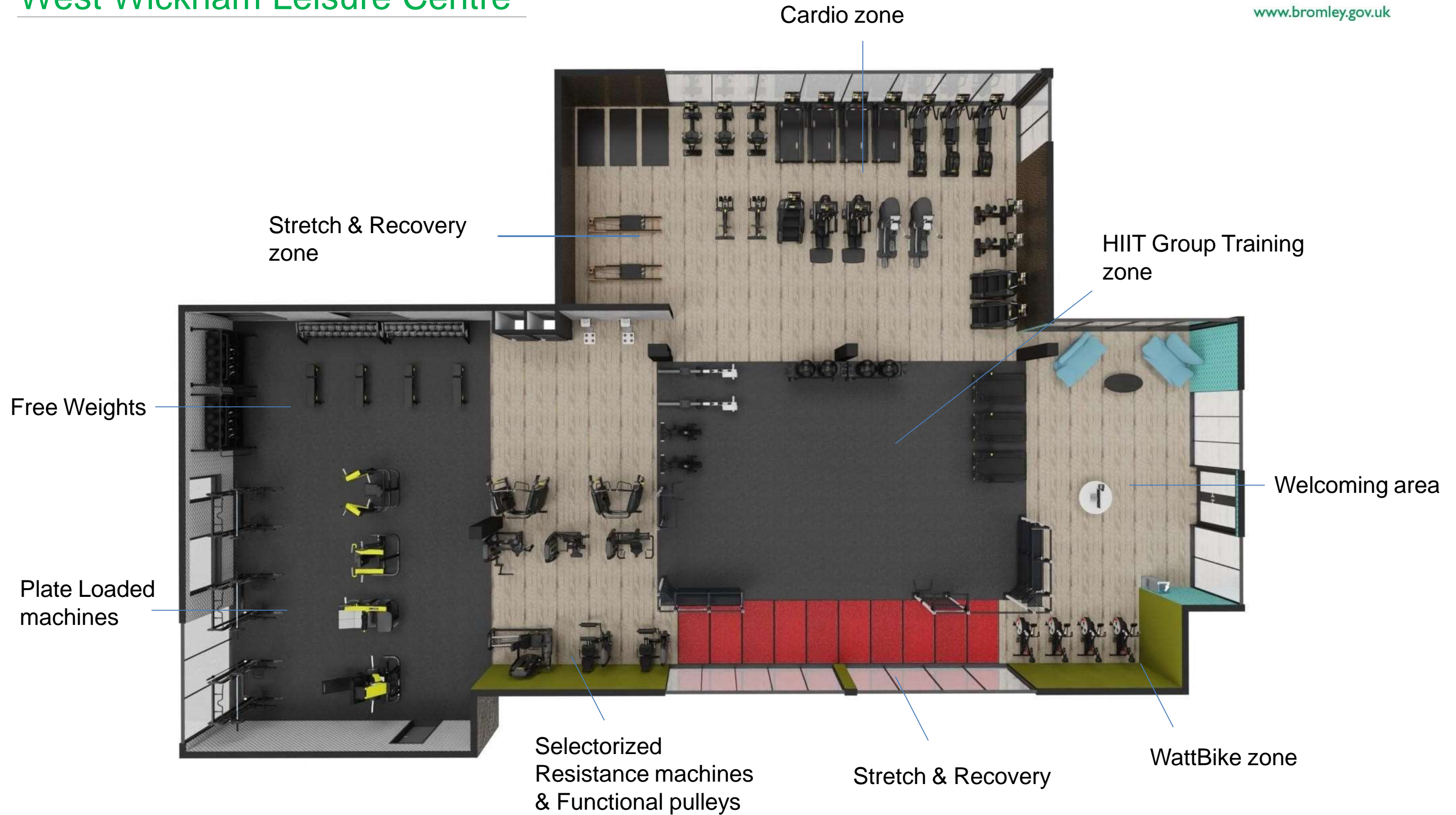
Gym Design – 3D Visuals

West Wickham Leisure Centre



Gym Design – 3D Visuals

West Wickham Leisure Centre



Pool Hall – 3D Visuals

West Wickham Leisure Centre



Wet Change – Both Centres

Precedent Images



Innerva Studio – Both Centres

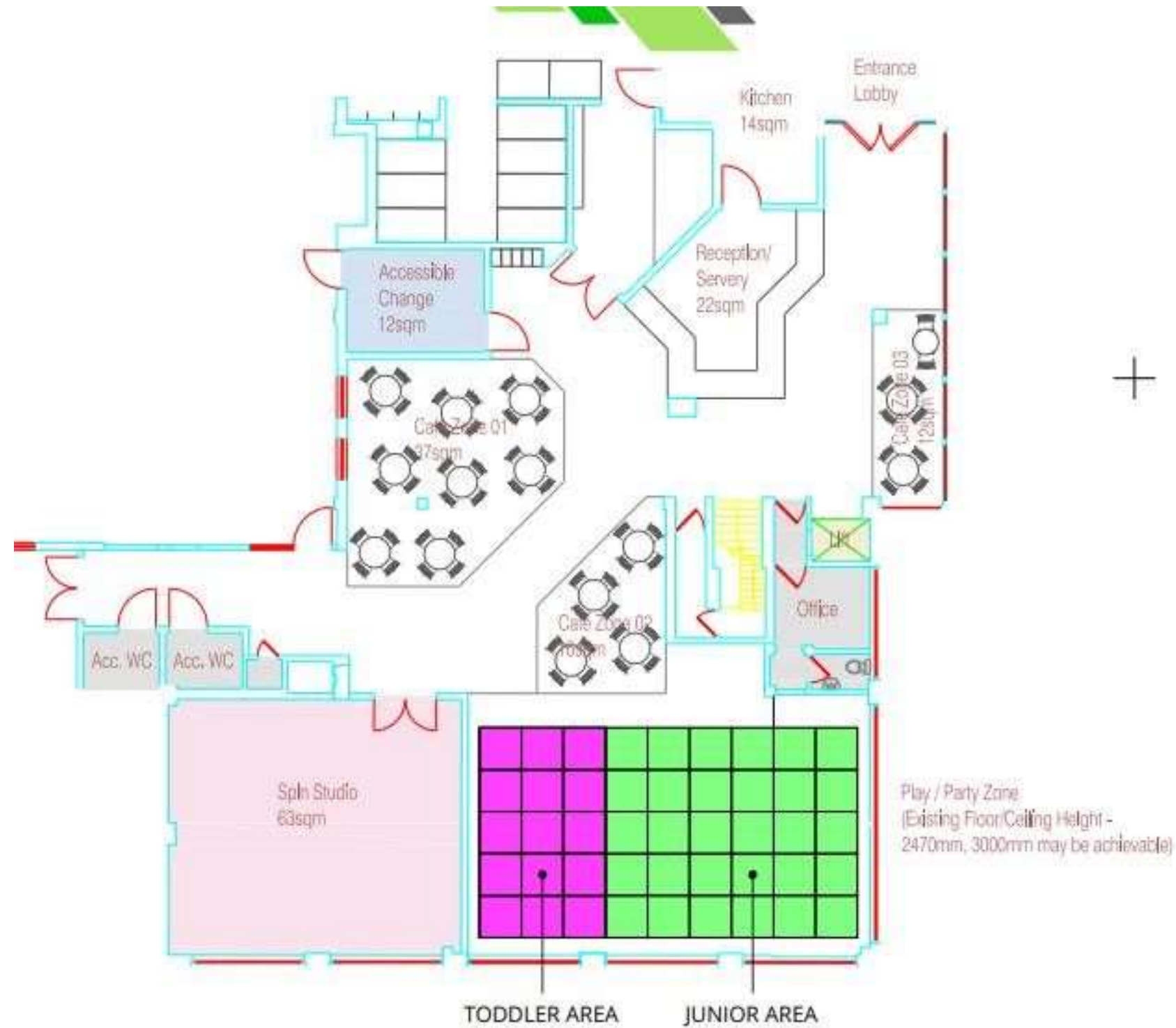
Precedent Images

Innerva suites are included in the core requirement of the centres, offering power-assisted exercise equipment which provides a low impact, full-body workout circuit for older adults and those living with long term conditions or physical injury. The machines would be outward facing facilitating social interaction between users, working to ease loneliness in the older generation. The suite promotes active ageing, helping to combat loss of muscle tissue and enhance balance and flexibility into older age.



Adventure Play Design – Layout

West Wickham Leisure Centre

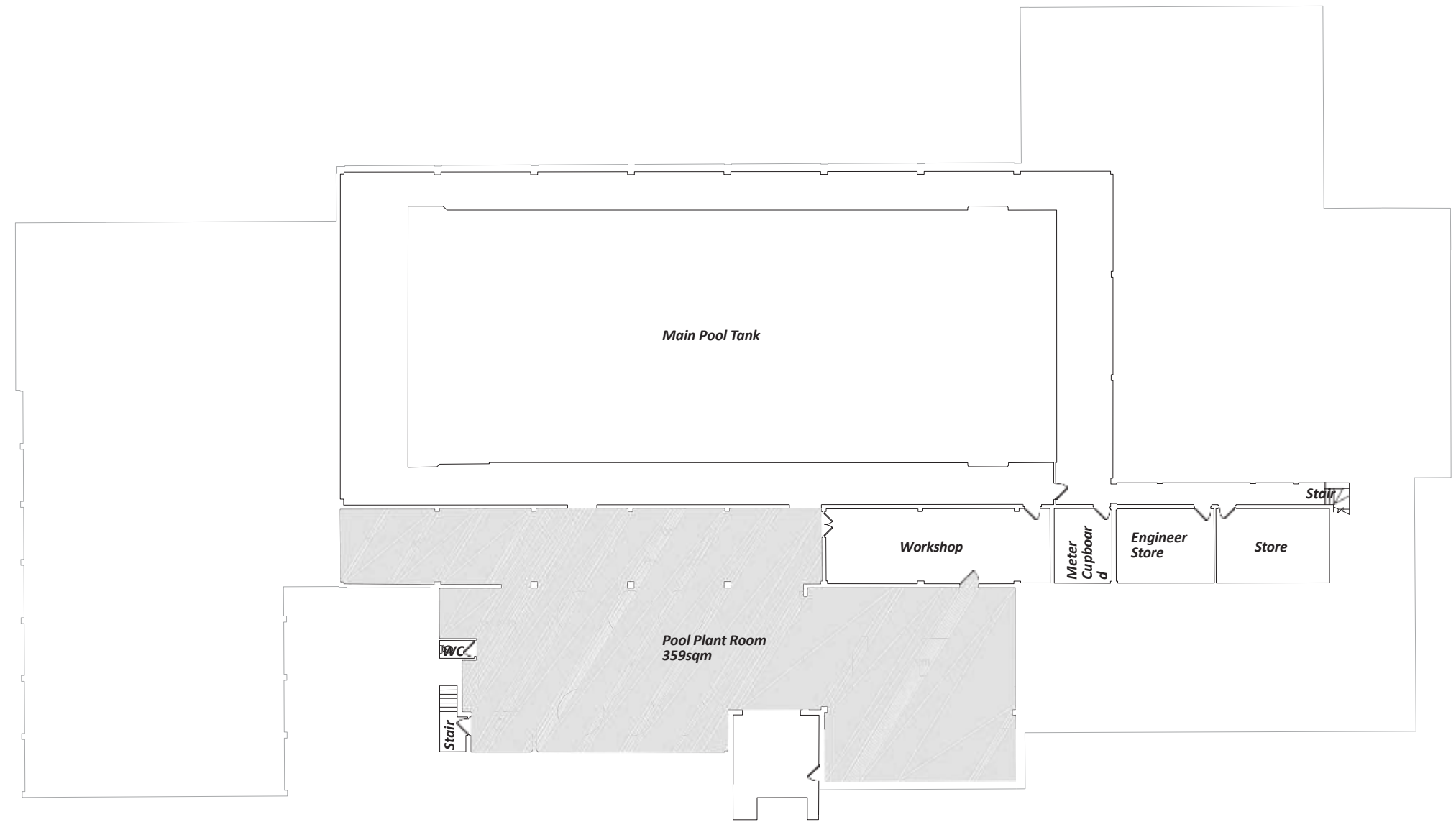


Adventure Play Design – Precedent Images **West Wickham Leisure Centre**



Floor Plans – Basement

West Wickham Leisure Centre

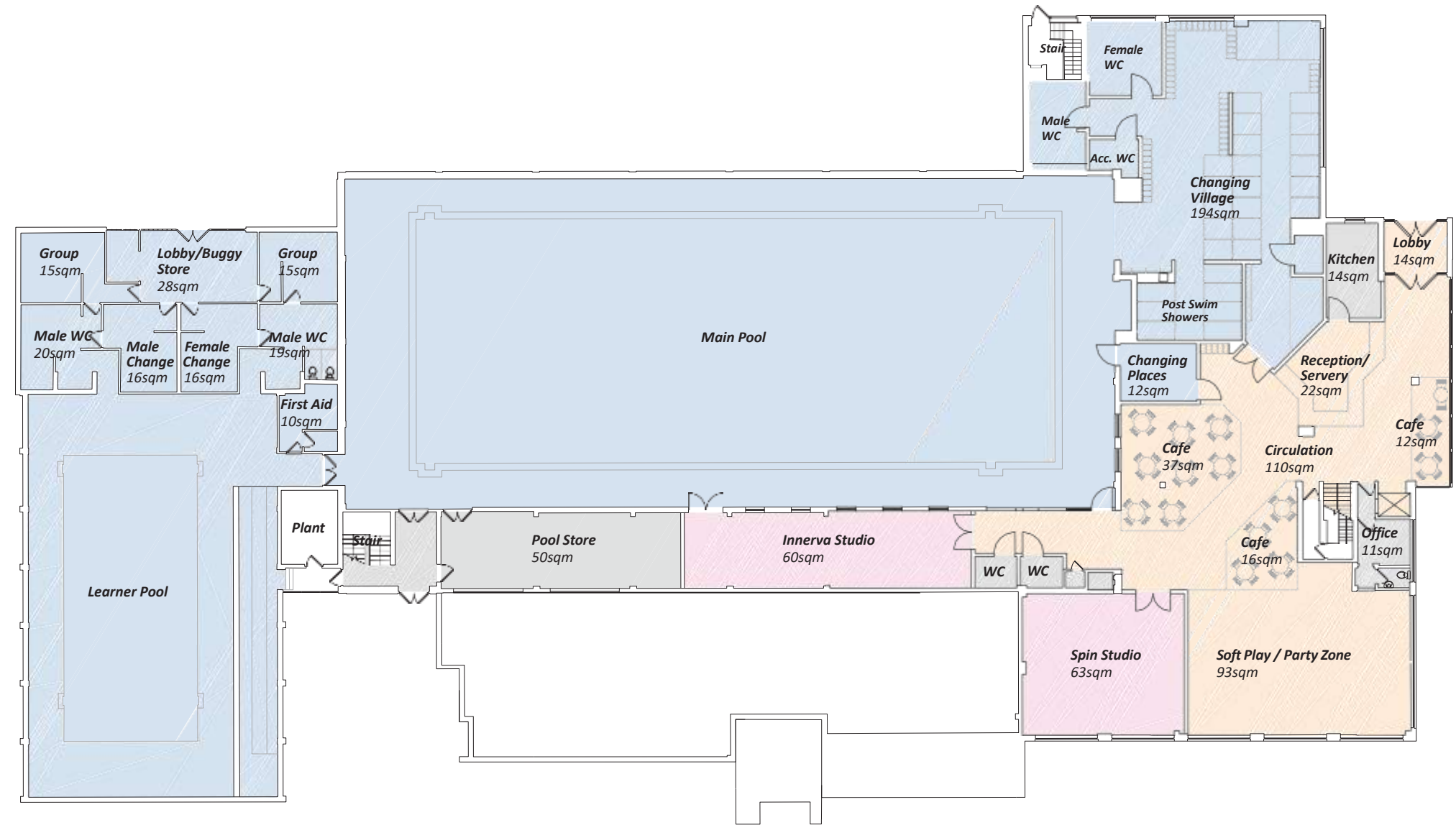


Wet Side Dry Side Health & Fitness Commercial Support

Plan is diagrammatic and not to scale.

Floor Plans – Ground Floor

West Wickham Leisure Centre

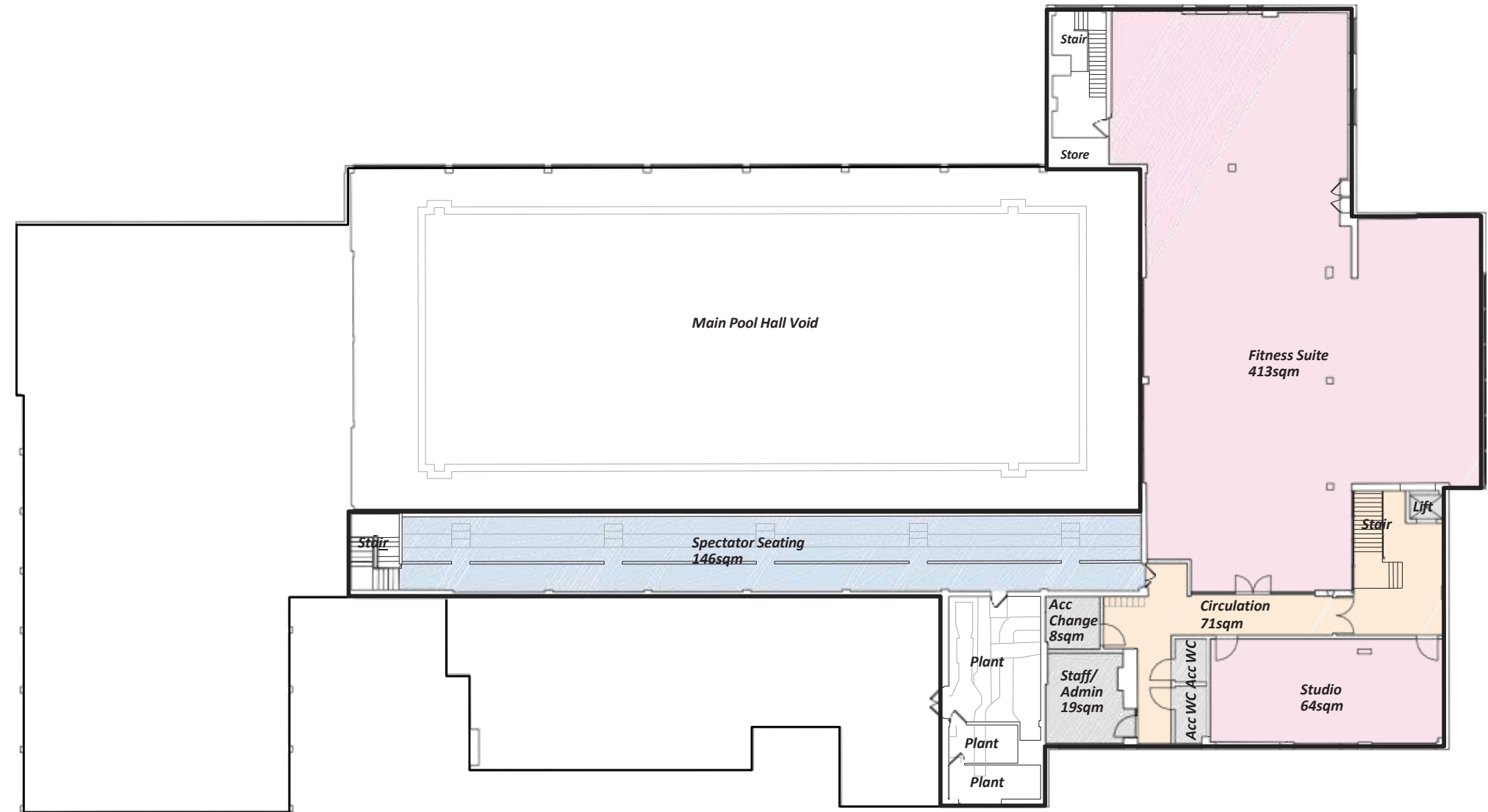


Wet Side Dry Side Health & Fitness Commercial Support

Plan is diagrammatic and not to scale.

Floor Plans – First Floor

West Wickham Leisure Centre



■ Wet Side
 ■ Dry Side
 ■ Health & Fitness
 ■ Commercial
 ■ Support

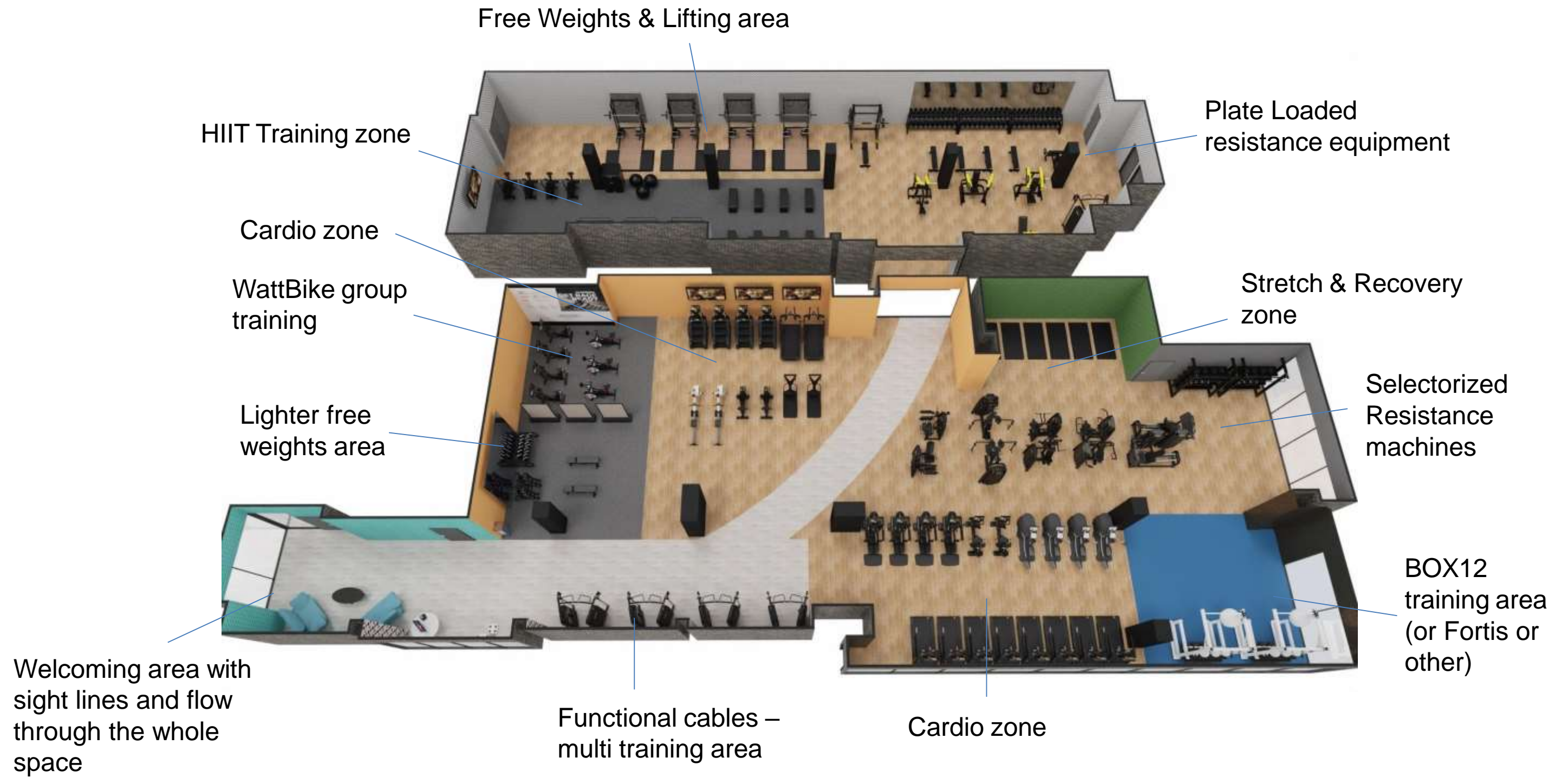
Plan is diagrammatic and not to scale.



Walnuts Leisure Centre Core Requirements

Gym Design – 3D Visuals

Walnuts Leisure Centre



Gym Design – 3D Visuals

Walnuts Leisure Centre



Precedent Images of Gym Spaces

Dry Change – Precedent Images

Walnuts Leisure Centre



Adventure Play Design – 3D Visuals

Walnuts Leisure Centre



Adventure Play Design – 3D Visuals

Walnuts Leisure Centre



Adventure Play Design – 3D Visuals

Walnuts Leisure Centre



Adventure Play Design – 3D Visuals

Walnuts Leisure Centre



Adventure Play Design – 3D Visuals

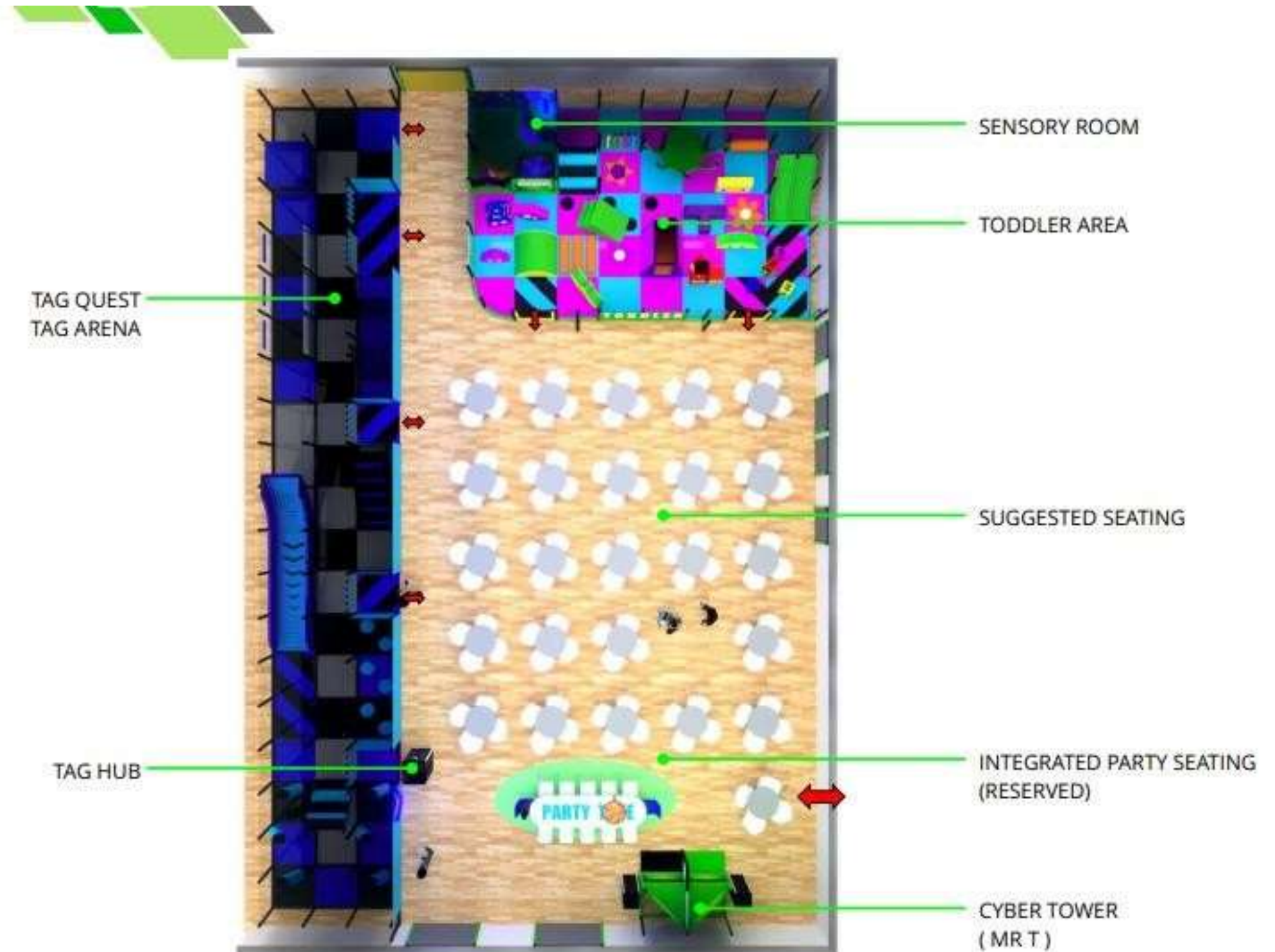
Walnuts Leisure Centre

KEY "TAG" FEATURES

- SPIDERWALLS
- GIANT CLEAR BALLS
- WEB MAZE CLIMBER
- TRAVERSE WALLS
- PUGIL STICKS
- ZIG ZAG CLIMBER
- CLEAR CRAWL
- SPIDER WEB MAZE
- SPINNING DOOR MAZE
- BASHBAG FOREST
- CHICANE RUN.
- ROLLER CHALLENGE

GAMIFIED PLAY ELEMENTS

- DECK CLIMB
- RACING SLIDE
- TUBE SLIDE
- DANGLY SNAKES
- UP & OVER CARGO
- ROPE BRIDGE
- TRI DECK CLIMB
- LOG RAMPS
- SPAT PADS
- BALANCE BEAM BOX
- FOAM HUMP
- VERTICAL ROLLERS
- CAUSEWAY DECK



Adventure Play Design – 3D Visuals

Walnuts Leisure Centre



Base Proposal Floor Plans - Basement

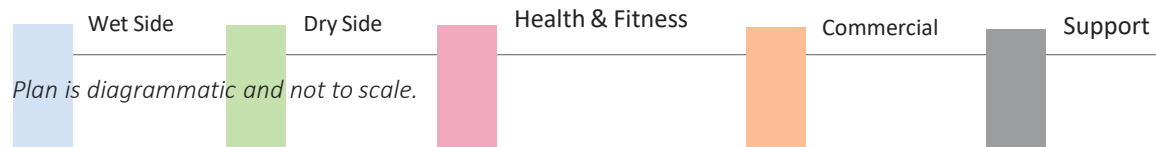
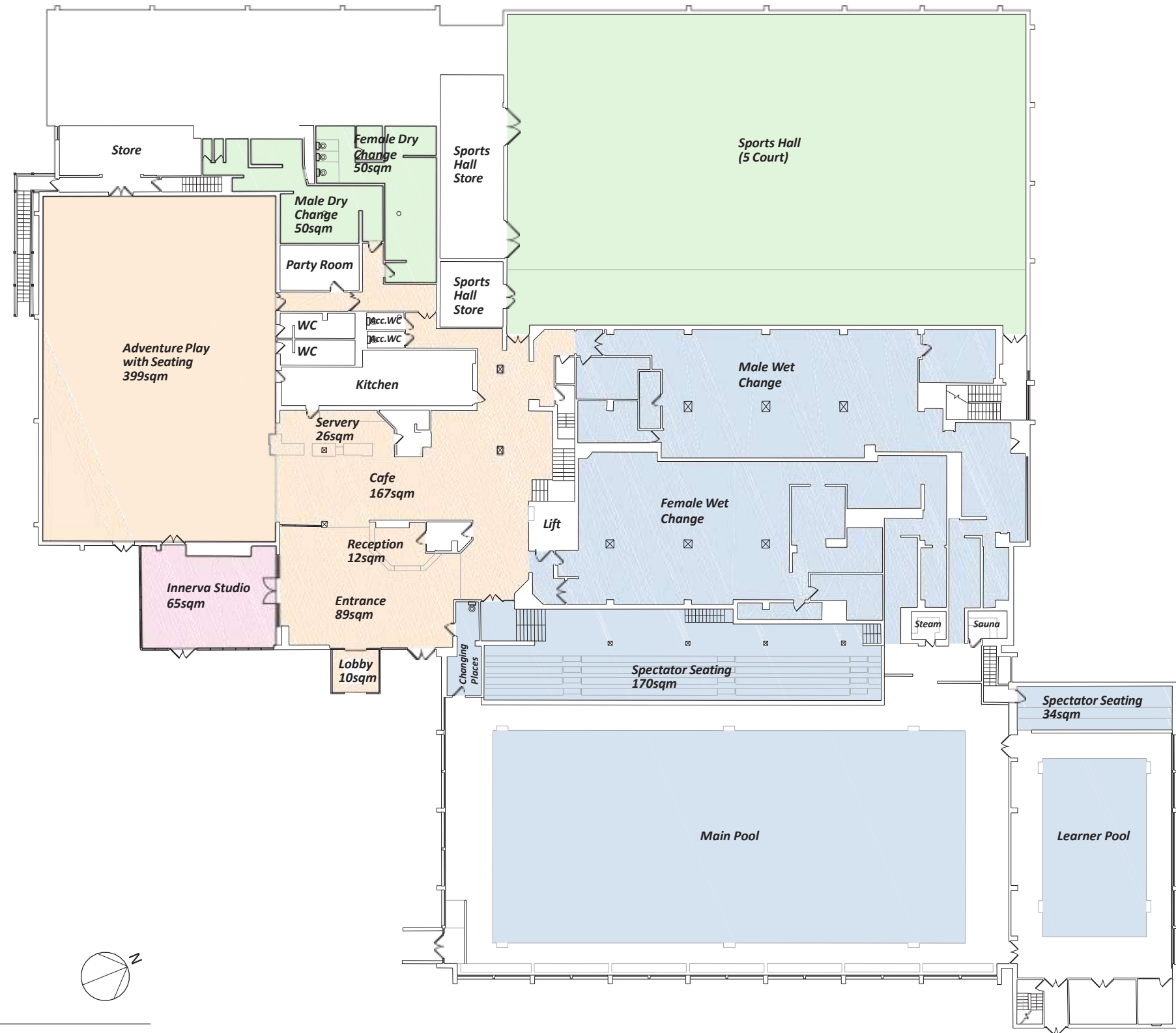
Walnuts Leisure Centre



■ Wet Side
 ■ Dry Side
 ■ Health & Fitness
 ■ Commercial
 ■ Support

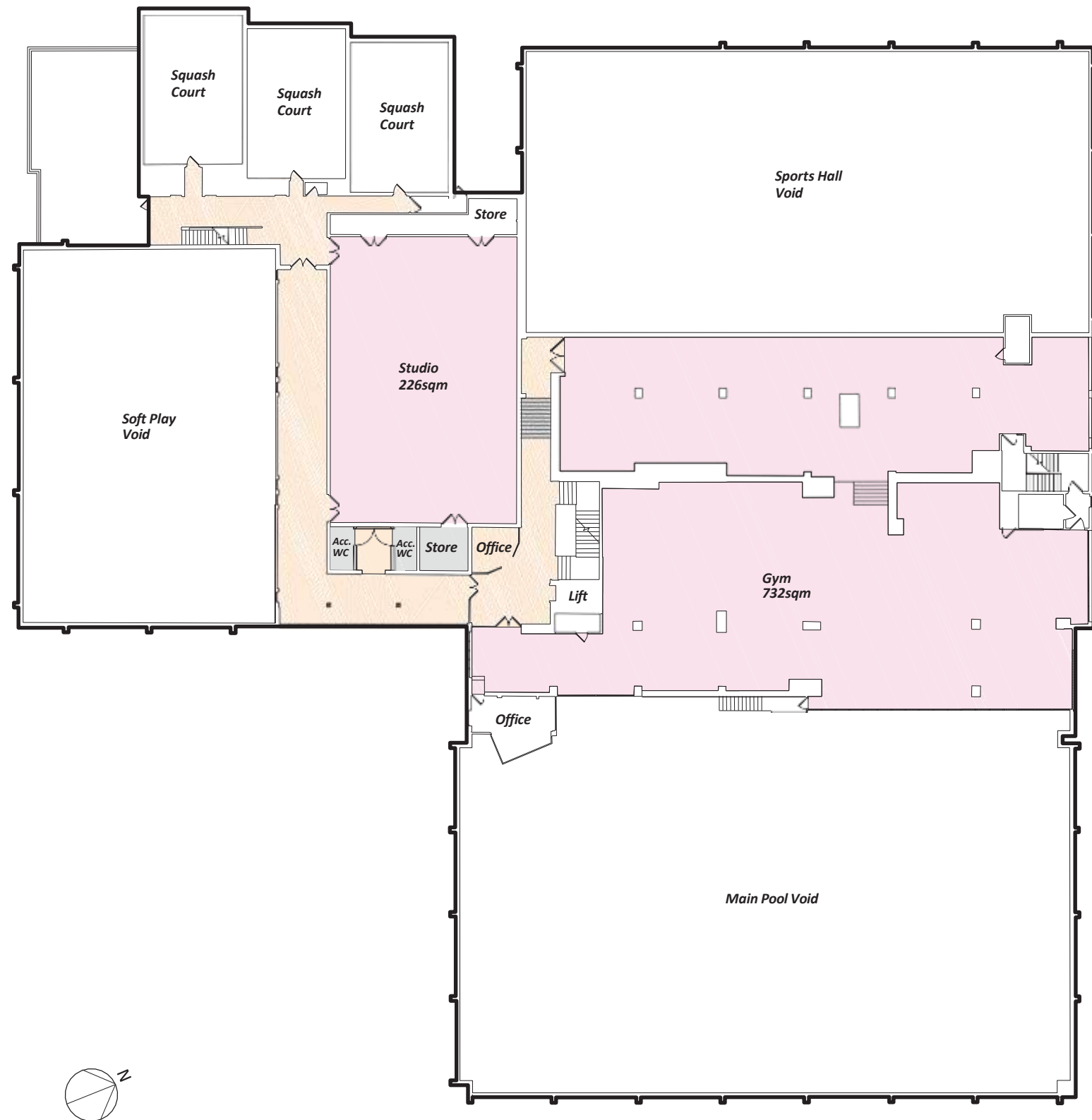
Plan is diagrammatic and not to scale.

Base Proposal Floor Plans – Ground Floor **Walnuts** Leisure Centre



Base Proposal Floor Plans – First Floor

Walnuts Leisure Centre

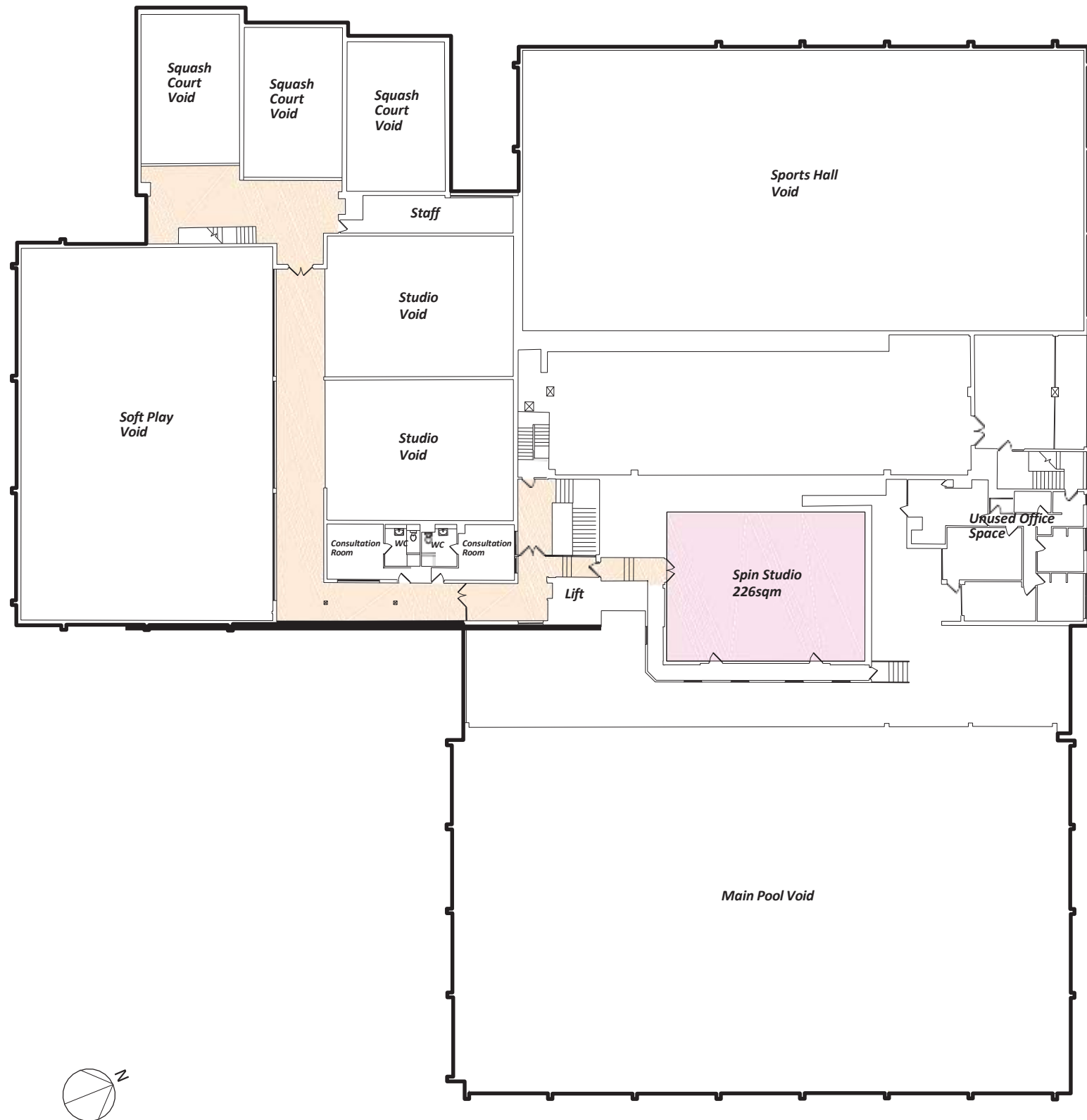


Wet Side Dry Side Health & Fitness Commercial Support

Plan is diagrammatic and not to scale.

Base Proposal Floor Plans – Second Floor

Walnuts Leisure Centre



Wet Side
 Dry Side
 Health & Fitness
 Commercial
 Support

Plan is diagrammatic and not to scale.

Report No.
HPR2023/053

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

Date: 18 October 2023

Decision Type: Non-Urgent Executive Key

Title: ADOPTION OF THE BROMLEY 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: Bromley Town; Plaistow

1. Reason for report

- 1.1. This report recommends the adoption of the Bromley Town Centre Supplementary Planning Document (SPD). The SPD provides guidance to assist with the determination of planning applications in the Bromley Town Centre area, including guidance on design requirements.
 - 1.2. A draft SPD underwent public consultation from 28 October 2022 to 27 January 2023. 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.
 - 1.3. Upon adoption of the SPD, it is recommended that the Council writes to the Secretary of State for Levelling Up, Housing and Communities to request that the Bromley Town Centre Area Action Plan is revoked.
-

2. RECOMMENDATION(S)

- 2.1 That Executive adopt the Bromley 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.
- 2.2 That Executive authorise officers to write to the Secretary of State for Levelling Up, Housing and Communities to request that the Bromley Town Centre Area Action Plan is revoked, as per the provisions of section 25 of the Planning and Compulsory Purchase Act 2004.

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 Bromley 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 Bromley 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 Bromley Town and Plaistow (wards which cover the draft SPD area) have been engaged on this work; and provided feedback on an initial draft of the consultation document. Ward councillors from the four surrounding wards – Shortlands & Park Langley, Bickley, Hayes & Coney Hall and Bromley Common & Holwood – were also invited to comment on an initial draft of the consultation document, with several councillors providing feedback. A number of comments on an early draft document were received, and the consultation document was amended to reflect these comments where appropriate.

All ward councillors were notified of the consultation on the draft SPD. No comments were received during the consultation period. At the 6 September 2023 meeting of RRHPDS, the Bromley Liberal Democrats noted that their consultation response was not reflected in the SPD and supporting documents; officers noted that there was no record of a consultation response being received. Following further investigation, it was found that the response was not received during the SPD consultation period due to a technical issue with the Council firewall which blocked the respondents email. At the meeting of Development Control

Committee on 5 October 2023, members requested that the response was provided to Executive for information. This is provided at Appendix 5, with officer comments on the response..

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 Bromley 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 Bromley 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 3.

Consultation on the draft Bromley Town Centre SPD

- 3.3 Executive approved the draft Bromley Town Centre SPD for consultation at their meeting of 6 October 2022³. The Council consulted on the draft SPD from 28 October 2022 to 27 January 2023. The consultation statement (provided at Appendix 3) 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 Bromley 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 BROMLEY TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT – CONSULTATION DRAFT, available from: <https://cde.bromley.gov.uk/documents/s50100161/Exec%20210922%20Bromley%20Town%20Centre%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 adopted 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 four character areas and eight 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.

3.12 More specific guidance is also 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 including:

- Bromley North Gateway – clarity about the potential suitable height of a taller element on the site, including an additional reference that any taller element would be subject to detailed design considerations.
- North High Street – minor amendment to clarify relevant heritage assets within the Site 3 boundary.

- High Street – amendment to state that new development should respect the setting of the Churchill Theatre, rather than being subservient to it. This amended wording ensures consistency with guidance elsewhere in in this sub-character area section.
- Civic Centre / Palace – updated wording to reflect the imminent relocation of civic functions.
- Bromley South – additional wording to ensure that new development does not affect the operation of Bromley Police Station.

3.15 RRHPDS and Development Control Committee considered the SPD at their meetings of 6 September 2023 and 5 October 2023 respectively. Members suggested several minor changes to the SPD, as set out in the schedule at Appendix 4. These changes have been made to the adoption draft SPD at Appendix 1.

Revocation of Bromley Town Centre Area Action Plan (AAP)

3.16 The Bromley Town Centre AAP was adopted in 2010, based on evidence produced in the mid-2000s, and technically remains an extant Development Plan Document. The document is significantly out-of-date, and has been largely superseded by the adoption of the Local Plan and the London Plan. The adoption of the Bromley Town Centre SPD, which provides detailed guidance for development in the town centre, will mean that the AAP ceases to have any relevance and would be fully superseded.

3.17 As the AAP is technically extant, this has caused some confusion about its weight and relevance to planning applications. The weight of the document has, in reality, been negligible for some time, but certain applicants have placed undue reliance on some parts of the AAP, despite it not reflecting the Council’s up-to-date planning policies and objectives relating to the development and use of land in Bromley Town Centre.

3.18 To avoid further confusion and to ensure that the Council’s relevant policy and guidance for Bromley Town Centre is clear, it is considered that the AAP should be formally revoked upon adoption of the SPD. The Council cannot revoke the AAP itself and must ask the Secretary of State for Levelling Up, Housing and Communities to do so, as per the provisions of section 25 of the Planning and Compulsory Purchase Act 2004.

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 Bromley 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 Bromley 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 2. 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 Bromley 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 2.
- 6.5 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 Bromley Town Centre SPD.
- 6.6 The further minor amendments made by Development Control Committee and RRHPDS (discussed at paragraph 3.15) do not have any further implications for the SEA screening statement.

7. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 7.1 The Bromley 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 Bromley Town Centre area and lead to positive outcomes.

8. IMPACT ON THE LOCAL ECONOMY

- 8.1 The Bromley 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 Bromley 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>Bromley Town Centre Area Action Plan (2010), available from: https://www.bromley.gov.uk/downloads/download/91/bromley-town-centre-area-action-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 (September 2023), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.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>



Bromley Town Centre Supplementary Planning Document

Adopted October 2023

Bromley Council

Bromley Town Centre Supplementary Planning Document – adopted 18 October 2023

For more information about this document, please contact:

Bromley Planning Policy Team

Email: ldf@bromley.gov.uk

1.	A Vision for Bromley Town Centre	1
	Introduction.....	1
	Vision for Bromley Town Centre	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	12
	Townscape and growth analysis.....	12
	Topography.....	12
	Land use.....	13
	Scale and character.....	13
	Heritage	14
	Green networks	15
4.	Design Principles	16
	Contextual (Character and Identity).....	16
	Responsive (Architecture and Landscape).....	17
	Connected (Movement and Connectivity)	18
	Inclusive (Access and Inclusion)	19
	Healthy (Health and Wellbeing).....	20
	Sustainable (Sustainable Design, Adaptability and Resilience).....	21
5.	Character areas	23
	Character areas and sub-areas	23
	General guidance for character areas	27
6.	Bromley North	36

	Bromley North Gateway	36
	North Village	39
	North High Street.....	42
7.	Bromley West	45
	High Street	45
	Church House.....	50
8.	Bromley East	52
	The Glades & Elmfield Road.....	52
	Civic Centre / Palace	56
9.	Bromley South	60
	Bromley South	60

1. A Vision for Bromley Town Centre

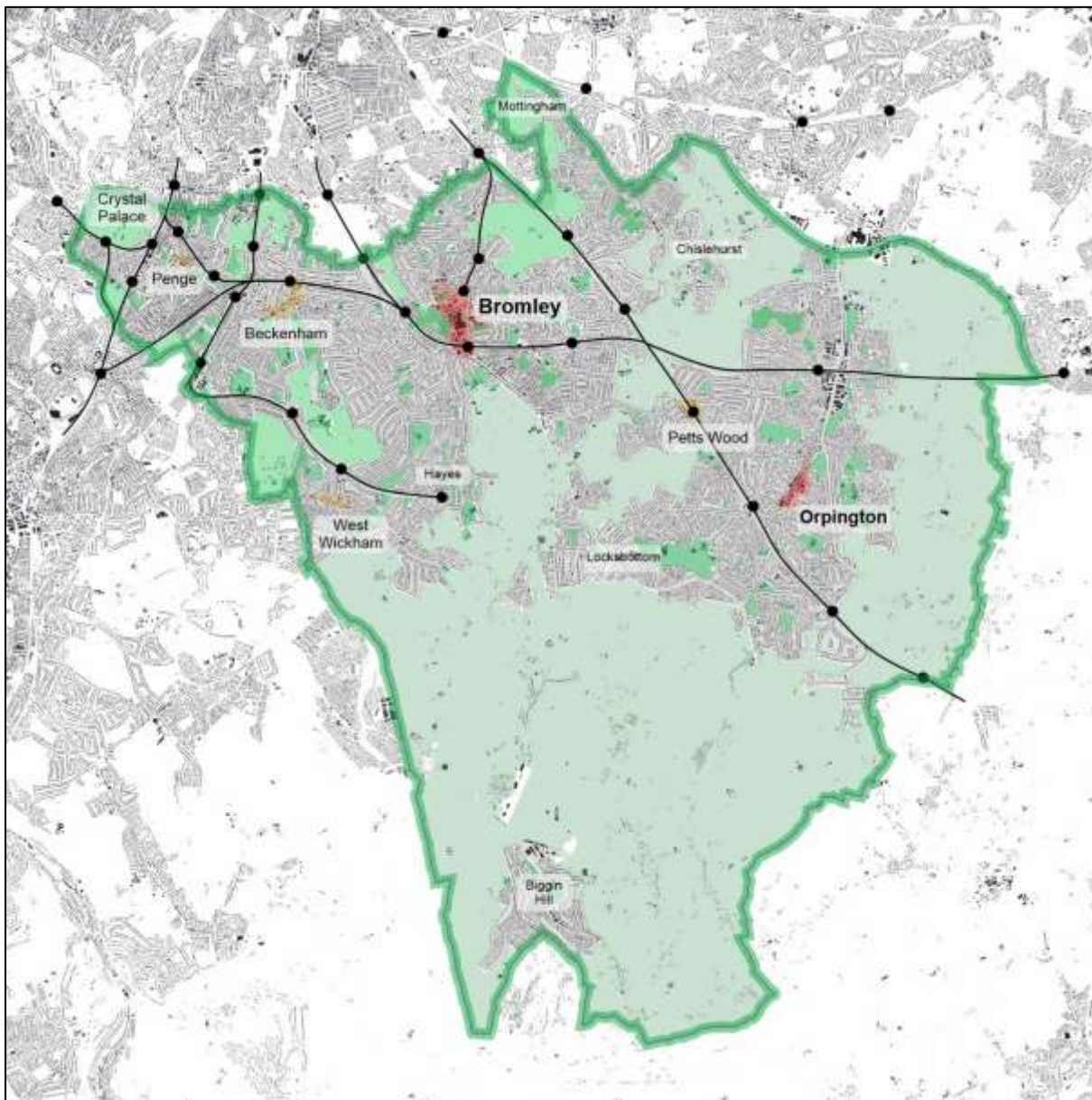
Introduction

- 1.1 Bromley Town Centre is, historically and currently, the main retail centre for the borough, as well as being a significant location for office use. It also has a significant residential population. It is a Metropolitan town centre and Opportunity Area, 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 northwest 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.

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 Bromley 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 Bromley 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 Bromley Town Centre 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 Bromley Town Centre

- 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 Bromley Town Centre:

“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 Bromley Town Centre should develop:

Vision for Bromley Town Centre

- The town centre will be the cultural, civic and economic heart of the borough, recognised for its cultural and leisure facilities and vibrant high quality shopping experience.
- Bromley Town Centre will develop a distinct residential character which will support the primary cultural, civic and economic role. The area will be home to a range of people and families living in high quality developments.
- Bromley Town Centre 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 buildings and a conservation area.
- Bromley Town Centre will maintain and enhance its role as a key office location in the Borough; it will provide a place to work and collaborate including grade A office space but also flexible, dynamic spaces for start-ups and creative workspace and spaces that are responsive to new working patterns post-pandemic.
- The town centre environment will comprise streets, squares, places, courtyards and ways, responsive to the human scale and easily navigable. Movement through 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.
- Bromley Town Centre will be intertwined with nature, with a more ecologically rich and diverse environment. Parks and open spaces will be key spaces for people who live in, work in and visit the town centre; these spaces will be accessible to all, balancing wild nature with urban play, leisure and culture.
- Bromley Town Centre 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.
- Bromley Town Centre 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 (both the pedestrianised and non-pedestrianised parts), Market Square, Elmfield Road, and the northern part of the town centre around East Street and West Street should first and foremost be places to dwell and enjoy.
- Bromley Town Centre 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 Bromley Town Centre is one of 14 Metropolitan centres in Greater London and the only one in the borough, making it the most significant town centre in the borough; the nearest equivalent centre is Croydon. Bromley is identified in the London Plan as a centre that should see strategically significant levels of commercial growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6).
- 2.9 Bromley Town Centre is designated an Opportunity Area with an indicative target of delivering 2,000 jobs and 2,500 new homes.
- 2.10 The London Plan also identifies Bromley Town Centre as an area with high potential for residential growth, either within or on the edge of the town centre. This is a broad strategic-level categorisation that Boroughs should have regard to when seeking opportunities for residential growth in and around town centres.
- 2.11 In addition, Bromley Town Centre is also identified as an area of mixed-use office potential with capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use, and an area of regional or sub-regional significance in terms of the night-time economy.

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>

- 2.12 There are a number of relevant London Plan policies that could apply to development proposals in Bromley Town Centre. The following policies are of particular relevance:
- 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.
- 2.13 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

- 2.14 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.
- 2.15 The Local Plan identifies Bromley Town Centre as a focus for sustainable growth of retail, office, homes, and leisure and cultural activities, as well as allocating a number of sites for future development. Relevant policies supporting this requirement are set out below:
- Policies 13, 14 and 16 are relevant to Bromley Town Centre. The policies cover the Bromley Common Renewal Area, which closely adjoins the south-eastern corner of the town centre.
 - 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, or close to, Renewal Areas should demonstrate how their benefits asset out in Policy 13, and where appropriate be guided by Development Briefs or other guidance.
 - Policy 16 defines expectations of the Bromley Common Renewal Area:

“Proposals within the Bromley Common Renewal Area will be expected to maximise opportunities to create a successful transition zone from Bromley Town Centre to the suburban and semi-rural urban fringe and produce a positive gateway to Bromley Town Centre along the Hayes Lane / Homesdale Road / A21(Bromley Common) junction, supported by appropriate green infrastructure.”

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 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.
- 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 Bromley Town Centre conservation area covers the northern part of the town centre.
- Policy 48 identifies ‘Views of Local Importance’; the view of Keston Ridge from the southern section of Bromley High Street (looking south), and the view west and south from Martins Hill, Bromley. The Churchill Theatre and Library is a designated local landmark; views of this landmark are also protected by policy 48.
- Policies 59 and 79 are concerned with enhancing biodiversity and addressing deficiencies, based on the Local Plan’s assessment of Areas of Local Park Deficiency & Areas of Deficiency in Access to Nature. The eastern side of Bromley Town Centre has a deficiency in Local Parks (2 hectares or more) and the whole of Bromley Town Centre has a deficiency in access to nature. There is an existing sequence of Urban Open Spaces (Policy 55) and Local Green Spaces (Policy 56) (Queensmead, Martins Hill, Church House Gardens, College Green, Queens Gardens and Bromley Palace Park), three of which - Queensmead, Martins Hill and Bromley Palace Park - are also designated as Sites of Importance for Nature Conservation (Policy 69).
- Policy 73 notes the importance of trees. Proposals for new development will be required to take particular account of existing trees on the site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained.
- 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 84 aims to manage and improve the supply of high-quality office floorspace in the three Business Improvement Areas, and so proposals will not be permitted which result in the loss of Class B1(a) floorspace or which compromise the primary function of the BIA. There are three Business Improvement Areas within Bromley Town Centre. Three Article 4 Directions¹¹ to withdraw the permitted development right for change of use from office to residential in the three Business Improvement Areas came into force in July 2022. In addition, the Council has also made Directions to remove office to residential demolition (Class ZA) permitted development rights in the three Business Improvement Areas. 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 90 sets out the intention to prepare an Opportunity Area Planning Framework for Bromley Town Centre to deliver a minimum of 2,500 homes and an indicative 2,000 jobs and maximise its contribution to the vision and objectives of the Local Plan.
- 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.

¹¹ Available from: <https://www.bromley.gov.uk/planning/permitted-development>

- 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 93 aims to preserve retail as the primary function specifically within The Glades shopping centre.
- 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. Bromley has an historic street market operating on the High Street.
- Policy 101 aims to retain shopfronts of architectural merit and sets out criteria for the design of existing and new shopfronts.
- Policy 115 seeks to reduce flood risk including through the application of the sequential and exception tests to avoid inappropriate development in relation to flood risk. Parts of Bromley Town centre are within higher risk flood zones, including land at Bromley South. A number of main river culverts lie under the town centre area, including culverts in close proximity to allocated sites. The protection of these culverts is vital to reducing the risk developments pose to increasing flood risk elsewhere.

2.16 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 Design Guide SPD will be relevant to development within Bromley Town Centre, 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 Bromley 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

2.17 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.

2.18 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.

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

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>

- 2.19 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.
- 2.20 The IDP identifies various infrastructure requirements relating to Bromley Town Centre, particularly those focused on improving connectivity and establishing Bromley Town Centre as a transport hub. This includes significant improvements to the public realm and localised junction improvements, particularly on the A21. 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.
- 2.21 The Local Plan sets out the Council's transport investment priorities, with aspirations for improved transport links to Bromley North and Bromley South, for example through the enhancement of the Docklands Light Railway and Tramlink along with extensions of the London Underground.
- 2.22 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.

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

- 3.1 Bromley Town Centre is a designated Metropolitan town centre and is the largest town centre in the Borough. 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. Bromley Borough has a very strong architectural heritage which is reflected in the Bromley Town Centre conservation area, which includes a number of listed and locally listed buildings.

Townscape and growth analysis

- 3.2 Bromley's role as a notable market town developed due to its location on a major coaching route to London. The town centre developed around the marketplace, located at today's Market Square, and grew along the old London to Hastings turnpike. Early maps show buildings grouped around the marketplace and the High Street.
- 3.3 Up to the mid-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. The opening of Bromley South railway station in 1858 and Bromley North railway station in 1878, and the subsequent suburban expansion of London, further encouraged growth as residential development radiated out from the historic town centre.
- 3.4 By the 1930s, the town centre had seen extensive development, including significant commercial and civic developments, with the High Street extending further south to connect with Masons Hill. Post-war, the town centre saw substantial redevelopment including post-Blitz reconstruction; this was largely within the existing development footprint. This included extensive new cultural, civic, and commercial facilities, such as the Churchill Theatre.
- 3.5 The commercial success of Bromley Town Centre altered the character of Bromley as a market town. The Glades Shopping Centre was completed in 1991 and the High Street was pedestrianised in the early 1990s to accommodate the popularity of Bromley as a commercial centre.
- 3.6 Pedestrianisation of the High Street was facilitated by the construction of Kentish Way in the early 1990s, to bypass the town centre and form a continuation of the A21; this created some severance issues between Bromley South and Masons Hill, and access to the east of the town centre towards the Civic Centre.
- 3.7 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.

Topography

- 3.8 Topography is a key consideration for developments in the town centre. Bromley Town Centre has excellent accessibility via public transport, with various bus routes and two train stations. Bromley South Station is situated at the bottom of the High Street, at the lowest lying part of the Town Centre. Access to the heart of the town centre is via a moderately steep, but short, 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.

- 3.9 The change in topography is a key characteristic of the town centre which will influence the layout, height, scale and massing of future development.

Land use

- 3.10 Bromley is a Metropolitan town centre which serves a wide catchment area across the Borough and beyond into other Boroughs in London. It benefits from excellent accessibility to Central London and the wider South East by a variety of transport modes, particularly public transport.
- 3.11 The town centre provides a range of comparison and convenience retail, notably on the pedestrianised High Street and within the Glades Shopping Centre. The town centre is a focal point for offices, with concentrations of office use on Elmfield Road and around Bromley South and Bromley North stations and on London Road.
- 3.12 Leisure and cultural uses (including the Churchill Theatre), community facilities and civic functions (including Bromley Central Library) are also prominent in the centre.
- 3.13 Recent changes to the Use Classes Order (UCO) could have an impact on the retail offer in Bromley Town Centre, 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 Bromley Town Centre.
- 3.14 The town centre retail has proven resilient during the pandemic, with few long-standing vacant units remaining in the town centre.
- 3.15 Your Bromley is the Business Improvement District (BID) for Bromley Town Centre¹⁷. The BID was first established in 2015; 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

- 3.16 The central High Street area, which extends from Elmfield Road in the south to Market Square in the north, 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.
- 3.17 Market Square has an intimate character; buildings are typically two to three storeys in height, including the prominent 1930's neo-Tudor building in the centre. The square is framed by several locally listed buildings of architectural merit.
- 3.18 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

¹⁷ Details of Your Bromley are available from: <https://yourbromley.com/>

with the finer grain surroundings; the large footprint contributes to east-west severance within the town centre.

- 3.19 The majority of buildings in the northern High Street area, which runs from Market Square in the south to Bromley and Sheppard's Colleges in the north, date from the late 19th century; these are typically around three storeys in height with narrow frontages. A number of earlier buildings survive, typically timber framed two storey structures.
- 3.20 There are distinctive Victorian terraced dwellings in the area to the north of Market Square and in the vicinity of Bromley North Station. This area contains a number of important listed and locally listed landmark buildings including Bromley North Station, the former Town Hall, the 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.
- 3.21 Masons Hill was originally a distinct settlement to the south-east of the town centre, and currently connects the town centre with the Bromley Common Renewal Area. This area lacks a discernible character, in part due to the dominance of Kentish Way which runs through the area.

Heritage

- 3.22 Heritage designations and assets in Bromley Town Centre reinforce local distinctiveness in the town centre.
- 3.23 Bromley Town Centre conservation area is centred on the historic marketplace at the centre of the town; the most significant concentration of listed buildings in the town centre are located here, including the Grade I listed Bromley and Sheppard's Colleges.
- 3.24 The conservation area includes large areas of historic landscape. Much of this is also protected through green / open space and nature conservation designation.
- 3.25 The Bromley Town Centre conservation area Statement SPG (2011) provides a detailed appraisal of the architectural and historic character of the conservation area; and an overview of planning policy and management guidelines on how this character should be preserved and enhanced in the context of appropriate ongoing change.
- 3.26 The SPG divides the conservation area informally into the following character areas:
 - High Street (central section) - *'a fine grained traditional shopping street, with individual shop fronts retained.'*
 - High Street (northern section) - *'a traditional shopping street, which is not dominated by large box illuminated signage and individual shop fronts.'*
 - Market Square – *'a market town with the appearance of single frontage shopfronts and non dominant signage.'*
 - Ravensbourne Valley - *'open/green and semi rural character.'*
 - Widmore Road (East) and Tweedy Road – *'a residential road on the edge of the Town Centre with elegant rows of houses either side of Widmore Road.'*
 - Queens Gardens and the Glades Shopping Centre - *'a quiet landscaped enclave with mature trees close to the busy shopping centre.'*
 - Bromley North - *'a village atmosphere with fine grain retail and residential leading to a gateway containing civic buildings and a church at the Junction of Widmore and Tweedy Road.'*

- 3.27 This subdivision and the analysis of the qualities and attributes of these areas, as set out in the SPG, is relevant for this SPD.
- 3.28 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.
- 3.29 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 Bromley Town Centre¹⁸, the majority of which is covered by an archaeological priority area. The London Plan policy HC1 will also be relevant to any development proposals within these areas.
- 3.30 The Palace on the site of the modern Civic Centre is a significant listed building in a historic landscape, with several listed structures also within the grounds. Despite its historic and civic role, it is somewhat severed from the rest of the town.

Green networks

- 3.31 Bromley Town Centre includes extensive areas of public green space within and adjacent to the area, notably Queensmead, Martins Hill, Church House Gardens, Queens Gardens and Bromley Palace Park. The River Ravensbourne runs to the south of the Town Centre, including culverted sections. There are also several 'pocket parks' located within the town centre, including at the junction of Tweedy Road and London Road, and outside St Mark's Church at Bromley South.
- 3.32 However, the town centre is identified as deficient in access to nature. Small parts of the north, east and south of the town centre are identified as deficient in access to local parks.
- 3.33 Many site allocations and potential development sites sit adjacent to the town's existing network of green spaces, presenting a vital opportunity for development proposals to play a role in enriching biodiversity whilst boosting access and connectivity to and through these areas.

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

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, 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 Bromley Town Centre has a distinctive character arising from historic and architectural features and its role as a significant commercial and civic location. The success of new development in Bromley 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 a number of historic buildings of notable architectural merit and local significance, including several statutorily listed buildings. A key urban design objective is to preserve and enhance the existing qualities of the 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 other 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 – policy 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 by 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 connections to and from public transport nodes and connections to the eastern part of the town centre that address the severance caused by Kentish Way.

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

NPPF – sections 8 and 12

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. Good design can also help to reduce the perception, and incidences of, crime and disorder, which can have significant detrimental impacts on local communities.
- 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 17 and 26

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

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>

- 4.26 Bromley Town Centre’s numerous green and open spaces are a fantastic asset which add value to the town centre’s offer and also support improved physical and mental health. Development proposals should seek to enhance access to nature and access to green space, including through improving connections between existing spaces.
- 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 Bromley 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: Bromley character areas and sub-areas



Character Areas and Sub Character Areas

- | | |
|--|--|
|  Bromley North |  Bromley East |
|  Bromley West |  Bromley South |



© Crown copyright and database rights 2023. Ordnance Survey 100017651

Bromley North

Bromley North Gateway

5.3 An area centred upon Bromley North Station and bordering residential areas to the northeast of the town centre.

Key characteristics:

- Land use – Bromley North Station, office uses
- Prevailing building height – generally three to four storeys with individual taller buildings of six and ten storeys
- Development potential – high

North Village

5.4 A predominantly low-rise and fine-grain area set between the High Street and the A21, North Village comprises residential, commercial and social uses. The area is home to several heritage assets including Bromley and Sheppard's College.

Key characteristics:

- Land use – mix of uses, predominantly retail and leisure
- Prevailing building height – two to three storeys
- Development potential – low

North High Street

5.5 The High Street north of Market Square includes commercial and office space stretching up London Road.

Key characteristics:

- Land use – mix of uses, predominantly office, retail and leisure
- Prevailing building height – three to four storeys
- Development potential – low to medium

Bromley West

High Street

5.6 This area includes the part of Bromley High Street south of Market Square, up to Bromley South Station.

Key characteristics:

- Land use – significant concentration of retail, cultural and leisure uses, with a mix of other uses including Bromley Library. Bromley Charter Market operates at the north of the sub-area
- Prevailing building height – three to four storeys with individual taller element at Churchill Theatre (nine to ten storeys)
- Development potential – medium to high

Church House

5.7 Church House is an area west of the High Street which descends toward the River Ravensbourne, including public gardens/parkland and low-density housing development west of the High Street.

Key characteristics:

- Land use – public park, low-rise residential houses
- Prevailing building height – N/A for Church House Gardens, two storeys in adjacent residential area
- Development potential – low

Bromley East

The Glades & Elmfield Road

5.8 Mid to late 20th Century development between the High Street and Kentish Way including the Glades shopping centre, retail units at the Mall, the Pavilion leisure centre and various office buildings. The sub-area also includes Queens Gardens, a well-used green space.

Key characteristics:

- Land use – significant concentration of retail, cultural and leisure uses at the Glades, and significant concentration of office uses on Elmfield Road
- Prevailing building height – generally four to five storeys with several taller buildings along Elmfield Road (the tallest being 10 storeys)
- Development potential – high

Civic Centre / Bromley Palace

5.9 An area formed of the former estate of the Bishop's Palace, currently serving as Bromley's Civic Centre, includes various council buildings in addition to the Palace, a historic landscape and a multistorey council car park facing Kentish Way. The area is bordered by low-rise housing.

Key characteristics:

- Land use – civic uses and public park
- Prevailing building height – three to four storeys on the Civic Centre site with two storey semi-detached housing to the north and south of the sub-area
- Development potential – medium

Bromley South

Bromley South

5.10 Bromley South comprises the land around Bromley South Station at the bottom of the High Street. To the east, the area connects to Mason's Hill.

Key characteristics:

- Land use – Bromley South Station, mix of commercial, retail and residential uses
- Prevailing building height – varied building heights across the sub-area. Broadly three to six storeys with two tall buildings (17 and 19 storeys)
- Development potential – high

General guidance for character areas

- 5.11 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

- 5.12 The historic environment in Bromley Town Centre adds significantly to the character and distinctiveness of the area. It is an integral part of achieving sustainable development in the area.
- 5.13 Bromley Town Centre has a number of heritage assets, including a designated conservation area, a number of statutory listed buildings and locally listed buildings and an archaeological priority area.

SPD guidance note 9

Development proposals must clearly set out any positive and/or adverse impacts on heritage assets, including the Bromley Town conservation area. 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

- 5.14 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.
- 5.15 Establishing appropriate densities for sites in Bromley Town Centre 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

- 5.16 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.
- 5.17 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).
- 5.18 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. Guidance on building heights which the Council considers to be suitable is provided in relation to specific character areas (where appropriate).
- 5.19 Topography is a particularly relevant consideration for tall buildings in Bromley Town Centre, given the difference in levels between the north and south of the area. Generally, taller buildings are likely to be more acceptable around Bromley South, correlating with the lower lying areas of the town centre. It should also be noted that the character to the north of the town centre, including in the Bromley North Gateway, North Village, North High Street and High Street character areas, also differs to that of Bromley South and features a higher concentration of listed and locally listed heritage assets; tall buildings are therefore less likely to be considered acceptable within this context.
- 5.20 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.
- 5.21 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 achieve exemplary architectural design quality and be appropriate to their local location and historic context, including taking account of 'Views of Local Importance'; the view of Keston Ridge from southern section of Bromley High Street (looking south), and the view west and south from Martins Hill, Bromley. The Churchill Theatre and Library is a designated local landmark; views of this landmark must also be a key consideration when considering tall building proposals.

Relevant policy and guidance includes:

Local Plan – policies 37, 38, 39, 40, 41, 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

5.22 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 Bromley Town Centre.

Figure 4: Bromley Town Centre key connections and potential connections²¹



Key Connections



Existing good connectivity



Key connectivity improvements

Please note, arrows are indicative.



© Crown copyright and database rights 2023. Ordnance Survey 100017661

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.

- 5.23 Bromley Town Centre benefits from excellent accessibility via various modes of transport, particularly walking, cycling and public transport. Connectivity within the town centre is improved by the pedestrianised stretch of the High Street and other recently improved public realm, including around East Street to the north of the town centre.
- 5.24 At a wider scale, various London Cycle Network Routes – Routes 27, 28, 63 and 75 - connect Bromley Town Centre with other parts of the Borough and to Greenwich, Lewisham and other Boroughs in London.
- 5.25 Kentish Way causes various severance issues, especially in terms of facilitating east-west movement to the current Civic Centre site and the suburban area beyond. Development proposals should seek to address this, including through public realm interventions which enhance the areas beneath the road.
- 5.26 Masons Hill/Westmoreland Road junction capacity improvements are identified as a potential transport improvement in the Local Plan, policy 36. This could help to address accessibility issues in the south of the town centre, particularly from/towards Masons Hill and Bromley Common (which is the busiest junction in the borough). These improvements could be particularly important given the development proposals coming forward in this area as well as the new Civic Centre site which is due to fully open in 2024.
- 5.27 As noted in paragraph 2.21, the Local Plan sets out the Council's transport investment priorities, with aspirations for improved transport links to Bromley North and Bromley South.
- 5.28 The Glades shopping centre provides a series of connections across the central part of the town centre but the consolidation of these connections within a single large 'mall' complex can be confusing due to a lack of clear natural wayfinding.

SPD guidance note 12

Development proposals should link with existing pedestrian and cycling key routes, and should seek to improve these routes or investigate new routes where appropriate (particularly major developments). Improvement of east-west routes will be a particular priority.

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, 32 and 36

London Plan – objective GG2 and policies T1 and T2

NPPF – paragraphs 92 and 104

Green infrastructure and biodiversity

- 5.29 The extensive green spaces within Bromley Town Centre are a significant asset for the town centre and offer 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.

- 5.30 However, these spaces currently do not provide adequate access to nature; as highlighted above, Bromley Town Centre is designated as an 'Area of Deficiency in Access to Nature'. Improvements to connectivity between existing green spaces in the town centre and the creation of new green infrastructure, such as green spaces (including pocket parks) which provide linked habitats and green corridors, creating opportunities for biodiversity to flourish through linkages between local Sites of Importance for Nature Conservation (SINCs). Opportunities for new and improved spaces could result from development in proximity to these spaces; a number of site allocations and potential development sites sit adjacent to the town's existing network of green spaces, presenting potential opportunities for future development proposals to play a role in enriching biodiversity whilst improving 'human' connections.
- 5.31 There is potential to enhance the role of Queens Gardens and Bromley Palace Park, through better connections, environmental improvements, and, where possible, enlargement of the green space; such enhancements would be demonstrably positive for the town centre as a whole, and would help to address the deficiency in Local Parks (of more than 2 hectares) on the eastern side of Bromley Town Centre.
- 5.32 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.

SPD guidance note 13

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 and beyond.

Relevant policy and guidance includes:

Local Plan – policies 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

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>

Sustainability

- 5.33 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.
- 5.34 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.
- 5.35 Development proposals in Bromley Town Centre should strive to provide exemplary sustainable design in line with Development Plan policy; this is particularly the case for larger schemes, which, due to their scale, offer the opportunity to deliver significant sustainability benefits.
- 5.36 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.
- 5.37 Bromley 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. Part of the town centre – Tweedy Road A21/High Street/Widmore Road A222 – is identified as an Air Quality Focus Area (AQFA), an area where the risk of exceeding pollution limits is high and where there is also high human exposure. 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 14

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.

²⁴ Available from: <https://www.bromley.gov.uk/pollution-control-air-quality/air-quality-bromley>

The energy hierarchy is the starting point for future-proofing development in Bromley 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.

New developments located in areas of flood risk will be expected to implement the recommendations set out in Bromley's latest Strategic Flood Risk Assessment (SFRA).

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

Use Class E and permitted development rights

- 5.38 The introduction of Use Class E has the potential for some positive benefits for Bromley Town Centre, 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.
- 5.39 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 Bromley 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.
- 5.40 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. In particular, the designated Business Improvement Areas (BIAs) in Bromley Town Centre could be affected. The BIAs feature significant amounts of office floorspace; the Local Plan aims to manage and improve this floorspace and resists

redevelopment proposals which result in the loss of office floorspace or compromise the function of the area.

- 5.41 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. It would also mean that the likely demand for new retail services from new town centre residents may not be able to be met, due to a lack of retail units.
- 5.42 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 15

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 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. Bromley North

Bromley North Gateway

- 6.1 This sub-area sits on the A21, a significant route that divides the town centre from residential areas to the north. Bromley North Station is located within the sub-area.
- 6.2 Local Plan Site Allocation 2 allocates Bromley North Station and adjacent land for mixed-use redevelopment for 525 residential units, 2,000sqm of office space, with community and retail uses. The allocation also sets out a clear requirement for the development of a transport interchange.
- 6.3 In the north of the sub-area, beyond the A21, former railway lands have become residential areas, predominantly made up of houses including larger family homes.
- 6.4 There are a number of office and commercial buildings along Tweedy Road and on Newman Road and Sherman Road. These areas are covered by a Business Improvement Area under Local Plan policy 84. The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.
- 6.5 The existing office and commercial buildings could 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.

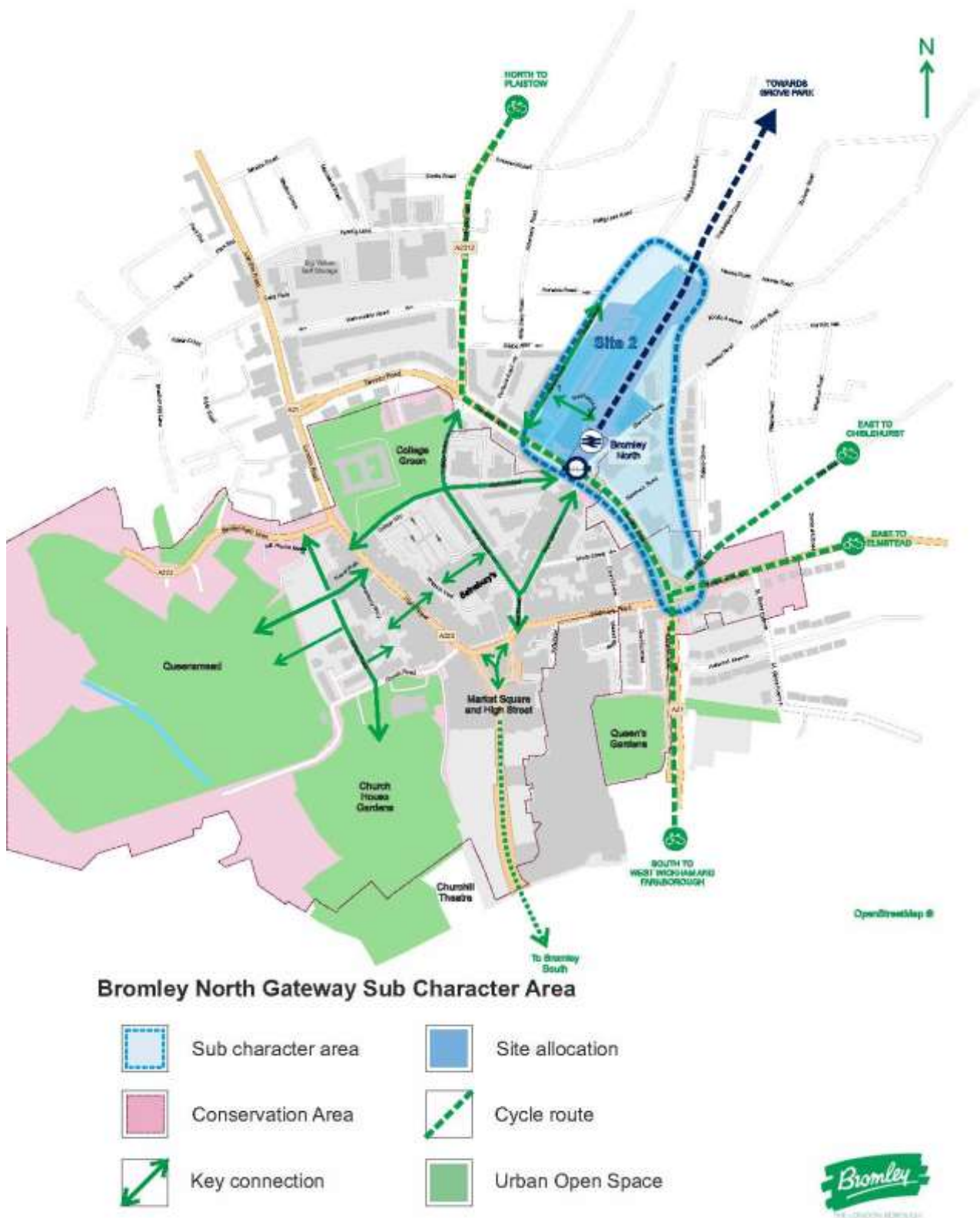
Development opportunities

Site 2

- 6.6 Proposals for the Bromley North site (Site 2) will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre; and respect and enhance the setting of the Grade II listed Bromley North Station building. Taking into account the local context (including the proximity of the listed station building) and relevant reference heights, the Council considers that high density development of around 4 to 8 storeys would be appropriate for this location. A taller element of around 10 storeys may be suitable for part of the site, referencing the existing 10 storey Northpoint House although this would be subject to detailed design considerations.
- 6.7 Careful consideration should be given to how larger blocks are experienced at ground level and perceived in townscape terms; ground floor animation and 'visual breaks' in the skyline will be particularly important to avoid the appearance of an unbroken 'wall of development' adjacent to the railway line.
- 6.8 Development of this scale would allow for the square in front of the station to become the heart of the sub-area, a functional, usable public space surrounded by development of a human scale. There is an opportunity for this square to reach across the road toward East Street and create connections to make the area a place to linger and dwell close to the station. This would support office, leisure and other commercial uses in the area, and could facilitate development of new or expanded office, leisure or commercial uses.

- 6.9 Development on the western side of the railway line should respond to both the existing context to the west of the site and any future emerging context to the east. In particular, the relationship with the existing two storey properties on Station Road, Babbacombe Road and neighbouring streets to the west is key in terms of townscape and amenity impact.
- 6.10 Development proposals for this site should accord with the following key parameters:
- Permeability through the sub-area (in accordance with inclusive design principles) will be a key consideration. Publicly accessible connections to and through the site should be explored, to improve pedestrian and cycling access and to create a pleasant and easily navigable environment.
 - Development proposals should incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity.
 - Development proposals should be of exemplary design quality, referencing the existing context and character of the surrounding area which includes several notable civic buildings which should inform the choice of materiality and detailing for new development and/or the redevelopment of existing buildings.
 - A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be considered for Northside House and Northpoint House, should these buildings come forward for redevelopment. However, Northside House currently restricts permeability and connectivity to Bromley North Station; as such, the redevelopment of this building may be appropriate as part of a wider placemaking vision.

Figure 5: Bromley North Gateway sub-area



© Crown copyright and database rights 2023. Ordnance Survey 100017661

North Village

- 6.11 This sub-area is covered by the Bromley Town Centre conservation area and has a distinct historic character. The area includes significant concentrations of retail and leisure uses, particularly along East Street, Widmore Road and at the Sainsbury's site accessed from West Street. These uses are in close proximity to low-rise residential uses.
- 6.12 Bromley and Sheppard's College, a Grade I Listed building, lies to the north of the sub-area, surrounded by College Green, an important green open space in terms of recreation and biodiversity.
- 6.13 The Grade II listed Bromley Old Town Hall is located to the east of the sub-area, on Widmore Road. Planning permission was granted in 2021 to convert the Old Town Hall building to a hotel, with new residential development on the adjacent car park site²⁵.
- 6.14 Opportunities for new development in the sub-area should be sensitively balanced with the aim to protect and enhance the sub-area's historic character, townscape and listed buildings. The Bromley Town Centre 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.
- 6.15 There may be opportunities for small-scale and infill residential and/or commercial development on primary streets in the area, 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.
- 6.16 In terms of acceptable uses, it is expected that any proposals that do come forward would maintain an active frontage at ground floor level for retail, leisure, night-time economy uses or other commercial uses, particularly along East Street, High Street and Widmore Road. On upper floors, residential use may be appropriate where such uses can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 6.17 Opportunities to enhance College Green, in terms of improved links to and through the space or expansion of the space itself, should be considered as part of new development proposals. Urban greening, particularly new street trees, will be supported, whilst maintaining a clear pedestrian thoroughfare in line with inclusive design principles.
- 6.18 The public realm in the area is of good quality, with recent improvements around East Street creating an attractive and pedestrian-friendly retail and leisure environment. Further public realm improvements will be supported where they lead to improved pedestrian accessibility and more inclusive design. Increases in pavement activity and outdoor facilities linked to restaurants, bars or pubs are acceptable in principle, as they can help to support the vitality and viability of these uses, but they should not lead to adverse impacts for pedestrian access and connectivity.

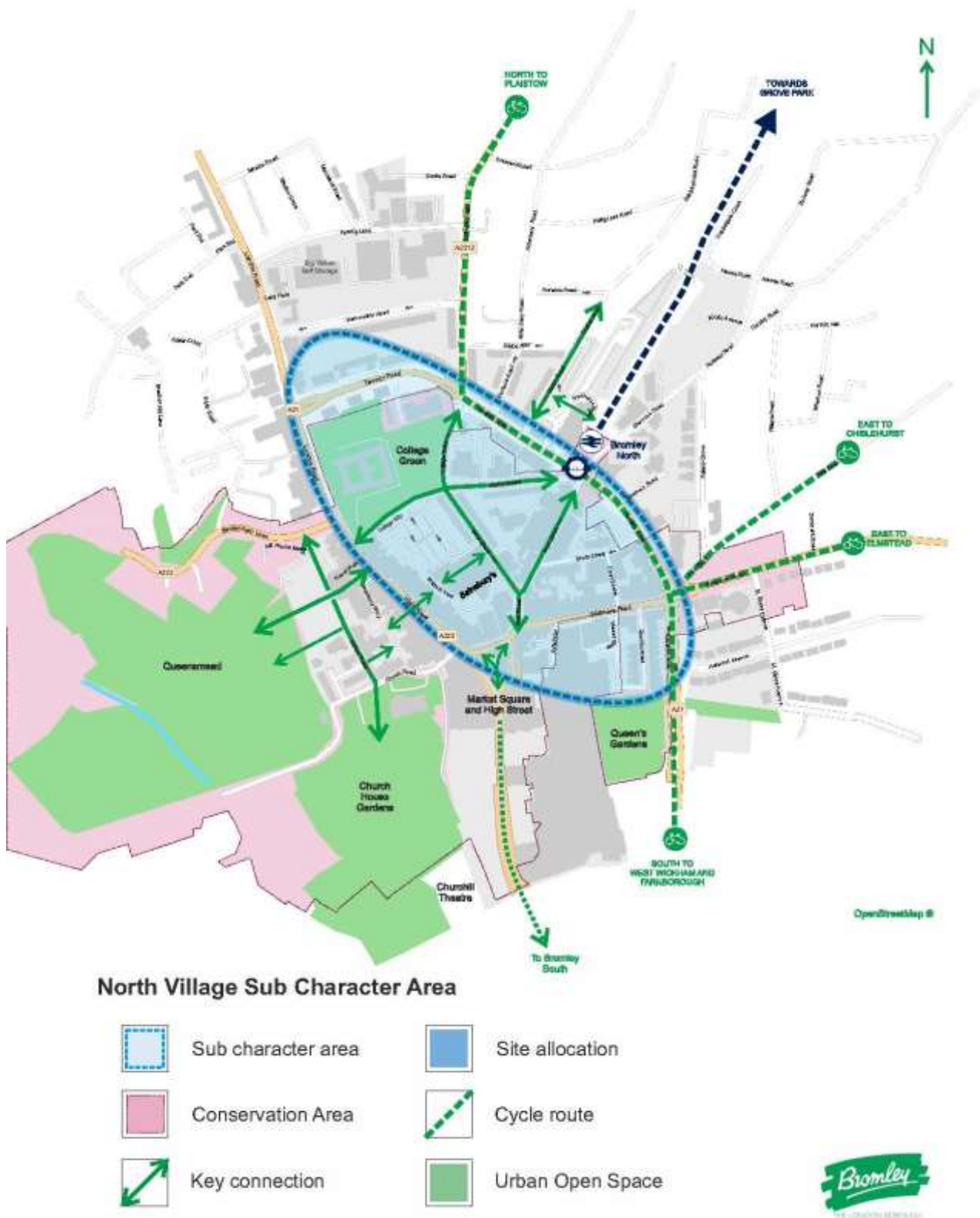
Development opportunities

Sainsbury's site and Walters Yard

²⁵ Planning permission reference: 19/03545/FULL1

- 6.19 The Sainsbury's store and car park occupies a significant site at heart of the sub-area. There could be an opportunity to redevelop this site for mixed-use retail and residential development, with provision of improved links across the town centre and new green spaces linking to College Green.
- 6.20 The protection and enhancement of the historic environment is a key requirement. Development proposals should respond appropriately to the local context, which is characterised by low-rise buildings. The Council considers that low to mid-rise development, predominantly 2 to 3 storeys but with potential for taller 4-5 storey elements where designed and sited sensitively, would be appropriate in this location.
- 6.21 Development proposals should seek to improve the interface with the surrounding streets, stitching new connections into existing street patterns. The current Sainsbury's store presents a blank frontage onto a large part of West Street. New development should seek to create an active frontage along West Street, with high quality public realm linking north to College Green and south towards the High Street/Market Square.
- 6.22 The existing car park could be rationalised and repurposed for improved public realm and green infrastructure opportunities, provided that any adverse impacts that may arise due to the loss of the existing parking and servicing space are mitigated. Limited development may be acceptable on the southeast part of the car park adjacent to the current store's location; however, the site should retain a sense of openness to avoid adverse impacts on College Green and Bromley and Sheppard's College. There may be potential to create a continuous publicly accessible green space linking any new development with College Green.
- 6.23 Improved public realm should be prioritised along Walters Yard. Currently, this road is used for servicing access for Sainsbury's, and servicing and parking for shops on the High Street. There may be opportunities to utilise this space to create new areas of activity and help facilitate improved vitality and viability on the High Street itself, although such opportunities should be balanced with any continuing need for servicing access. 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. Opportunities for improved permeability through to the High Street should be explored.

Figure 6: North Village sub-area



© Crown copyright and database rights 2023. Ordnance Survey 100017661

North High Street

- 6.24 This sub-area has a linear boundary which runs along the High Street from Market Square and then along London Road up to the junction with Tweedy Road. It also includes parts of Church Road and Beckenham Lane. The sub-area is largely covered by the Bromley Town Centre conservation area.
- 6.25 The sub-area includes several heritage assets including the Grade II* listed Church of St. Peter and St. Paul, the Grade II listed Partridge Public House and Royal Bell Public House. The Royal Bell has planning permission for the refurbishment of the public house and an extension to provide a new nine storey hotel development²⁶. The Grade I listed Bromley and Sheppard's College, which is within the North Village sub-area, is also in close proximity.
- 6.26 There are a number of office and commercial buildings along London Road to the north of the sub-area. These areas are covered by a Business Improvement Area under Local Plan policy 84. The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.
- 6.27 North High Street also includes a Local Plan site allocation - Site 3, Hill Car Park and Adjacent Lands. Local Plan policy 1 and appendix 10.2 identify the site for 150 residential units. Development proposals will be expected to respect the local historic character and heritage assets; integrate the site into the wider town centre; and minimise adverse impacts on the designated Local Green Spaces of Martins Hill and Church House Gardens to the west.
- 6.28 This sub-area has a strong commercial function, with a number of office, retail and leisure uses (including several independent businesses). This commercial function should be maintained and enhanced, through protection of existing frontages and commercial uses, and prioritising new uses where development comes forward. New commercial uses could include provision of smaller retail units conducive to occupation by independent operators, and a range of different office/workspace typologies (for example, co-working space).
- 6.29 On upper floors along the High Street, residential use may be appropriate where such uses can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 6.30 There may be opportunities for small-scale and infill residential and/or commercial development along and to the rear of the High Street, 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 three to four storeys. Developments of a similar height may be acceptable subject to detailed design and heritage impact considerations.
- 6.31 Development proposals should seek to improve east west connections, particularly connections between the High Street and Church House Gardens.
- 6.32 There may be opportunities for utilising parts of backland sites, particularly along Harmony Way and other areas to the rear of the western side of the High Street, to provide outdoor facilities linked to restaurants, bars or pubs, or provision of new workspaces; this could help to

²⁶ Planning permission reference: 18/03252/FULL1

support the vitality and viability of these uses. Such opportunities should not lead to adverse impacts for pedestrian access and connectivity.

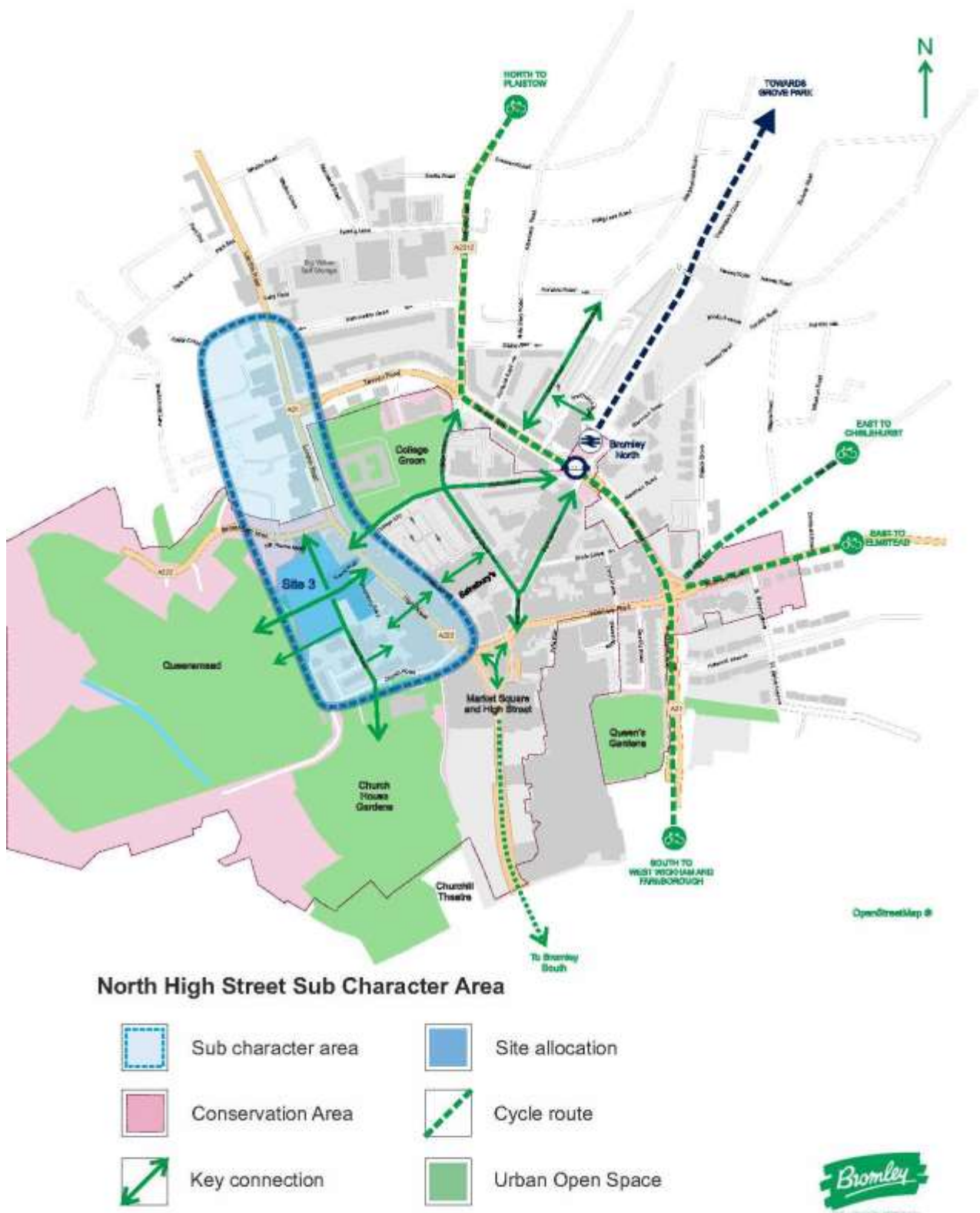
- 6.33 Development proposals should respond to the existing context and character of the area which should be used to inform the choice of materiality and detailing for new development and/or the redevelopment of existing buildings. Scale and materiality should be carefully considered and sympathetic to that of the North Village character area.

Development opportunities

Site 3

- 6.34 Site 3 is currently occupied by a large multi-storey car park (three storeys in height). The site occupies a prominent position at the top of Beckenham Lane, hence consideration of the topography of the site will be key, especially in relation to building heights.
- 6.35 The site is adjacent to three storey residential development immediately to the west, with predominantly three storey buildings fronting the High Street to the east. Respecting the scale of existing buildings should be a key design consideration of any future development proposal on the site. A maximum height of four to five storeys may be acceptable subject to appropriate scale and massing and detailed design considerations.
- 6.36 Activation at the corner of Beckenham Lane and Bromley High Street through provision of commercial uses is encouraged, potentially coupled with utilising the rear of High Street properties to complement retail and leisure uses on the High Street.
- 6.37 Improvements to public realm and improved permeability will be a key consideration for any future development, to better integrate the site into the town centre as per the requirements of the site allocation. In particular, development of site 3 offers potential for a new North-South route along Edison Road; and east west route providing a direct connection to Martins Hill. New routes should seek opportunities for greening where appropriate.
- 6.38 The site is partially within the Bromley Town Centre conservation area, and a significant part of the site is immediately adjacent to the conservation area. The local listed Bromley Picturehouse is within the site boundary, while the statutorily listed Swan and Mitre Public House is immediately adjacent to the site boundary. Any development within site 3 must have regard to these, and other, important heritage assets, preserving and enhancing their setting as well as ensuring that development does not detract from any key views to or from the assets in question.
- 6.39 The site allocation seeks car parking for public use and for any future residents. The allocation pre-dates the London Plan which requires car-free development in Metropolitan town centres; therefore, it would be expected that any future residential units would be car-free (with the exception of disabled parking provision). In terms of the existing public parking, loss of existing provision may be acceptable, particularly where this would help to optimise development on the site and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 6.40 The architectural language should reference the character and materiality of the surrounding town centre locality, particularly the prominent use of red brick.

Figure 7: North High Street sub-area



© Crown copyright and database rights 2023. Ordnance Survey 100017661

7. Bromley West

High Street

- 7.1 The High Street sub-area encompasses the main pedestrianised section of Bromley High Street, from Market Square in the north to Bromley South Station in the south. The sub-area has a strong commercial character, particularly retail, cultural and leisure uses; it is a key reason for the town centre's 'Metropolitan' status, alongside the Glades Shopping Centre. The majority of the High Street sub-area is within the Bromley Town Centre conservation area.
- 7.2 The historic Bromley Charter Market operates at the north of the sub-area, around Market Square, every Thursday, Friday and Saturday. The ongoing operation of the market is an essential component of a well-functioning, attractive and diverse town centre; any development which risks the ongoing operation of the market will be resisted.
- 7.3 The Churchill Theatre and Library is a key cultural use located just off the High Street. The building itself is a designated local landmark, which means that developments are required to protect or enhance the quality of views of the building. New development should respect the setting of the Churchill Theatre and Library, so as not to diminish its presence as a civic landmark building.
- 7.4 The High Street sub-area also includes the majority of Local Plan site allocation 10, West of Bromley High Street and land at Bromley South. Local Plan policy 1 and appendix 10.2 identify the site for 1,230 residential units, offices, retail and a transport interchange²⁷. Any proposals will be expected to incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location; improve Bromley South Station; provide a high-quality public realm and accessibility to and through the site; provide an attractive and active frontage to the High Street; and be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.
- 7.5 The High Street should remain a predominantly commercial area given its importance to the town centre commercial offer. However, some diversity of commercial uses could be acceptable, for example the introduction of new office, leisure, sports or community uses, pending assessment of any amenity impacts and provided the overarching retail function of the centre is retained. An element of residential uses may be acceptable at upper floor levels, provided they do not cause adverse impacts on existing commercial uses; adverse impacts could arise through the loss of commercial space (including ancillary space), and by introducing noise sensitive uses in close proximity to existing commercial uses. Agent-of-change considerations will be important when assessing any residential uses.
- 7.6 There may be opportunities for upwards extensions of existing buildings along the High Street, to facilitate new residential and/or commercial uses; proposals for residential uses should demonstrate that they can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers. Where upwards extensions do come forward, any increase in height should be modest and reference prevailing heights in the vicinity, which is

²⁷ Planning permission has been granted for a site within the Site 10 boundary, at 66-70 High Street (planning permission reference: 19/04588/FULL1)

generally three to four storeys. Developments of a similar height may be acceptable subject to detailed design considerations.

- 7.7 The High Street has an established pattern of built form characterised by a lower well-structured urban edge (typically three to four storeys) with taller elements set-back behind. Taller blocks set behind lower finer grain buildings is a clearly distinguishable feature of this sub-area; the human scale feel of the High Street contributes to its unique character which should be retained and reinforced.
- 7.8 New development which includes taller elements should follow this pattern; ensuring the form and massing of the buildings is set back from the main High Street frontage and sensitive to the ridge profile of the town centre topography.
- 7.9 This form reinforces a sense of townscape continuity, value, and coherent streetscape pattern; it is important to avoid disjointed breaks from inappropriate height and scale which would disrupt the established urban pattern and negatively impact on local character and identity.
- 7.10 New development should also respond to the low-rise residential character of the existing neighbourhood. In particular, development should step down in scale to address the existing residential neighbourhood to the west. Transitions in height and scale should be sympathetic and proportionate.
- 7.11 Development proposals in the southern part of Site 10 should acknowledge and respond to local context; however, they should not be competing with the tallest stand-alone buildings in Bromley South in terms of height and scale. It should be noted that Bromley South has a very different character to the High Street and the town centre; the Churchill Theatre is considered to be a more appropriate benchmark for proposals in the High Street sub-area (as the tallest building in the town centre which has a civic role). Development which seeks to exceed this height will require a strong townscape justification.
- 7.12 Improving connections within the town centre and to its surroundings is key to ensuring that the town centre can continue to function effectively and remains an attractive environment for pedestrians. In particular, improved east west permeability – to Church House Gardens in the west, and Queens Gardens and the Civic Centre site to the east – is a key opportunity and such improved connections should be considered as part of any relevant development proposals.
- 7.13 There may also be potential for improved north-south connections, both improvements to existing routes and potential for the creation of new routes; the delivery of Site 10 in particular offers potential for the creation of new routes parallel to the High Street. Any new routes should prioritise urban greening and create an accessible playable environment; new routes may also create potential for additional commercial activity, either through new uses or through space to support existing High Street uses.
- 7.14 The High Street has an eclectic mix of architecture, composed of buildings of multiple eras, styles, materials and scales. The character of the Bromley Town Centre conservation area and various listed and locally listed buildings will be key considerations for the design of development proposals in the sub-area. Whilst there is no single definitive architectural style within the High Street, development proposals should seek to reference aspects of the surrounding context to inform an appropriate design language. Materiality and architectural detailing is key in this regard, taking cues from local character and context to ensure that new development does not appear unrelated or alien within the streetscene.

Development opportunities

- 7.15 Site 10 is the key development opportunity within the sub-area, but this site is made up of a series of smaller sites. The allocation expects proposals within the site 10 boundary to be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site. This SPD provides broad guidance which would help to fulfil part of this masterplan role, i.e. it sets out key design principles which development should accord with and guidance for the sub-areas which the allocation is within.
- 7.16 Individual development sites within the site 10 boundary should not be designed in isolation; development proposals will be expected to demonstrate that they have considered the site in question holistically in order to deliver the allocation requirements, setting out clearly how each site relates to other existing sites within the site 10 boundary including sites which have permission or plans to redevelop. There is no set form that this information should take, although it is expected that it should include evidence of engagement with relevant landowners of other sites. Use of visuals and 3D modelling is encouraged to clearly indicate the relationship that a proposed development will have with other existing and planned development in the allocation boundary.
- 7.17 Development must respect the landscape character of the Church House Gardens to the west.

Site 10 (Churchill Quarter)

- 7.18 The Churchill Quarter sits at a key location within Bromley Town Centre, adjacent to the Churchill Theatre and linking the open green space of Church House Gardens to the High Street. Development proposals should seek to enable greater east-west permeability into and across the site to improve the relationship between the High Street and Church House Gardens.
- 7.19 New development should seek to provide a mix of commercial uses at ground floor level to support the creation of new public realm and amenity spaces. Existing community facilities such as the Bromley Town Church should be re-provided on-site or relocated within the town centre in an area of at least equal accessibility.
- 7.20 The scale and massing should respond to the existing context, focusing height within the centre of the site where there is less sensitivity, particularly with respect to lower-lying areas in the vicinity given the higher ground location of the site. Careful consideration should be given to how larger blocks are experienced at ground level and perceived in townscape terms; ground floor animation and 'visual breaks' in the skyline will be particularly important to avoid the appearance of an unbroken 'wall of development'.
- 7.21 The Council considers that maximum building heights should be proportionate to that of the Churchill Theatre – an important local landmark at around 10 storeys – although this would be subject to detailed design considerations. Building heights should step down towards the north and south in response to Church House Gardens and Ethelbert Road. The relationship with Ethelbert Road should be carefully considered in order to avoid an abrupt transition in scale.
- 7.22 Development should be of a high architectural quality, informed by local character and respectful of the adjacent conservation area setting. Referencing local context with site specific architectural detailing is key.
- 7.23 Development proposals should provide high quality amenity space proportionate to the scale and quantum of development proposed. There is an opportunity to create a new piece of public realm to the south of the Churchill Theatre to support civic and/or community uses, the design of which should respect the strong landscape character of Church House Gardens.

7.24 The creation of a hierarchy of spaces across the site each with their own function and character is encouraged. Further public realm improvements to Library Gardens should be incorporated into any future comprehensive re-development of the site.

Site 10 (other sites)

7.25 In addition to the guidance provided above on height, scale and massing, the following parameters apply to all other sites within the site 10 boundary, noting the overarching need for any individual sites to consider how they fit with the delivery of site 10 holistically:

- Development proposals should incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity.
- A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where sites come forward for redevelopment. Such an approach may be particularly suitable for those buildings on the western side of the High Street, from the corner of Ethelbert Road.

Figure 8: High Street sub-area



High Street Sub Character Area

- | | | | |
|---|--------------------|---|------------------|
|  | Sub character area |  | Site allocation |
|  | Conservation Area |  | Cycle route |
|  | Key connection |  | Urban Open Space |



© Crown copyright and database rights 2023. Ordnance Survey 100017661

Church House

- 7.26 This sub-area is framed around Church House Gardens, a unique green space which adds significant value to the Bromley Town Centre offer, for residents, workers and visitors alike. It is designated as an Urban Open Space in the Local Plan, as it provides an important break within the surrounding built-up area. The majority of the area is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 59).
- 7.27 A designated SINC covers the majority of the area, which includes sites with biodiversity value. It is also almost entirely covered by the Bromley Town Centre conservation area.
- 7.28 Improved connections through the park, particularly to the High Street, is a key objective, and should be prioritised as part of any improvement works or as part of development in the vicinity (such as Site 10 in the High Street sub-area). New connections should prioritise greening interventions and support improved biodiversity.
- 7.29 The River Ravensbourne runs north-south along the western edge of the park, partly culverted. Greater utilisation of the Ravensbourne is supported, in terms of increasing functionality and access and making it more prominent within the wider landscape (including de-culverting), although this would be dependent on available funding.
- 7.30 The large number of constraints makes development in the park unlikely, particularly any large-scale development. The former Council depot site to the northeast of the park may be suitable for development, consistent with its designation as an Urban Open Space; suitable development is likely to be small-scale, reflecting the current building footprint. Any development on the depot site must have regard to the setting of the Grade II* Listed Church of St. Peter and St. Paul immediately to the north. The site also has limited means of access through public parkland or via Tetty Way, a narrow service road with no adjacent footpath which along with significant level changes creates a poor pedestrian environment.
- 7.31 It is important that the sensitivity of the setting is reflected in the scale, type and architectural approach of any future development proposals; building on the 'urban edge' of the park and retaining an open aspect to the south and west to retain the openness of the 'wider' park setting would be a more favourable approach. Given the significant constraints, the site is considered to be more suited to cultural/community use facilities linked to the existing park amenities and amphitheatre rather than a separate self-contained residential development.
- 7.32 Although the depot site is a private site, there is little to distinguish it from the wider Church House Gardens. Where development does come forward on this site, the creation of new green, functional, publicly accessible parkland should be a key priority.
- 7.33 Use of the amphitheatre for cultural uses is supported. This could have positive impacts for the wider town centre, although any significant intensification of use must prevent adverse impacts on Church House Gardens, particularly any impacts on ecology and biodiversity.
- 7.34 The sub-area also includes roads to the south of Church House Gardens - Ethelbert Road, Ravensbourne Road and Ringers Road. These roads largely consist of semi-detached dwellings but have larger-scale buildings nearer to the High Street. Any development in this part of the sub-area should reflect the existing low-rise character and the landscape character of Church House Gardens. Sites at the High Street end of these roads (namely those within the Site 10 boundary) should be assessed using the guidance set out in the High Street sub-area, as these sites accord more with the character of the High Street sub-area.

Figure 9: Church House sub-area



Church House Sub Character Area

- | | | | |
|---|--------------------|---|------------------|
|  | Sub character area |  | Site allocation |
|  | Conservation Area |  | Cycle route |
|  | Key connection |  | Urban Open Space |



8. Bromley East

The Glades & Elmfield Road

- 8.1 The Glades & Elmfield Road sub-area includes two of the most significant commercial areas in the Borough. The Glades Shopping Centre is a key retail and leisure destination which forms a key part of the justification for Bromley's Metropolitan town centre status. The Pavilion Leisure Centre adjoins the Glades and provides important leisure facilities including a swimming pool.
- 8.2 Queens Gardens is an important green space adjacent to the Glades. It is designated as an Urban Open Space in the Local Plan, as it provides an important break within the surrounding built-up area. The majority of the area is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 62). It is also within the Bromley Town Centre conservation area.
- 8.3 Elmfield Road has a number of office and commercial buildings, covered by a Business Improvement Area under Local Plan policy 84. The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted. New office development is strongly encouraged where sites come forward for redevelopment.
- 8.4 Several buildings on Elmfield Road have planning permission for redevelopment or are subject to live applications. Wells House²⁸ has planning permission for demolition of an existing office building and the construction of a new building providing over 10,000sqm of office floorspace. Prospects House has planning permission²⁹ for demolition of an existing office building and the construction of a mixed-use building providing around 1,700sqm of Use Class E(g)(i) office floorspace and 61 residential units.
- 8.5 The balance of uses on recent applications on Elmfield Road has strayed towards residential-led mixed-use, which, if it continues, could fatally undermine the function of the Business Improvement Area. The Council strongly encourages commercial or commercial-led schemes in this area in order to maintain the area's business function. Elements of other uses may be acceptable where they do not threaten this function. Policy D13 of the London Plan (relating to agent of change) states that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. This could be particularly relevant where residential uses are proposed in close proximity to existing office/commercial uses.
- 8.6 The Glades currently acts as a significant barrier to east-west connectivity across the town centre, with a large section of inactive frontage facing Queens Gardens. Interventions to improve connectivity and activate frontages are supported; such interventions should seek to maximise greening and biodiversity and create playable environments.

²⁸ Planning permission reference: 19/03620/FULL1

²⁹ Planning permission reference: 20/04296/FULL1

- 8.7 In terms of land uses, the Glades should retain a commercial character given its importance to the town centre commercial offer. However, some diversity of commercial uses could be acceptable, for example the introduction of new office, leisure, sports or community uses, pending assessment of any amenity impacts and provided the overarching commercial function of the centre is retained.
- 8.8 The Glades has an extensive car park which serves the Glades itself and the wider town centre. Loss of existing provision may be acceptable, particularly where this would help to optimise the site for development of new uses and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 8.9 The Bromley Town Centre conservation area surrounds the Glades on three sides. Any development of the Glades, be that limited enhancements of the existing building, or partial or wider redevelopment, should address this 'gap' in the conservation area by referencing key features of the conservation area to inform heritage-led proposals. Any development must have regard to the amenity of adjacent residential uses at Queens Road and Lownds Court.
- 8.10 Increased activation of the Queens Gardens frontage is supported. Currently, the Glades presents a large expanse of blank frontage onto Queens Gardens. Opportunities for new or improved connections from Queens Gardens to the Glades and through to the High Street should be explored.

Development opportunities

The Mall

- 8.11 The potential redevelopment of The Mall provides an opportunity to support the Business Improvement Area designation set out in the Local Plan, which could have wider benefits for the town centre as a whole. New office uses are considered to be the most appropriate development in terms of enhancing this function, therefore the Council strongly encourages an office-led scheme.
- 8.12 In terms of design, development at this site should improve permeability across the site from east to west which is currently inhibited by the existing large building footprints, creating a physical barrier between the High Street and Elmfield Road.
- 8.13 Future development proposals will be expected to consider wider movement patterns (both existing and emerging) in order to improve legibility and permeability and to help stitch new development into the existing urban fabric.
- 8.14 This site forms part of a larger urban block with street frontages and key junctions on all 4 sides which should be suitably framed by built form. The site should be considered in its entirety as part of a coherent whole regardless of individual site/land ownership issues.
- 8.15 The scale and height of new development should respect the established townscape hierarchy with buildings stepping down to the east to provide a transition in scale between the taller elements of the town centre and the low-rise residential properties east of Kentish Way.
- 8.16 The principle of concentrating taller elements to the north following a gradual transition in scale from the south as reflected by recently consented schemes on the eastern side of Elmfield Road is accepted in principle subject to detailed design considerations. The height of the existing building (around 12 storeys) is considered appropriate in this location;

development proposals which seek to exceed this height would require a strong townscape justification.

- 8.17 The relationship between buildings and spaces is key; there is an opportunity for future landscape proposals to stitch into the emerging public realm improvements along Elmfield Road and to enhance the existing public realm fronting the Glades Shopping Centre.

Elmfield Road (general)

- 8.18 In line with the area's Business Improvement Area designation, opportunities for new office floorspace are strongly encouraged. A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where buildings come forward for redevelopment.
- 8.19 Buildings on Elmfield Road should follow a consistent pattern in terms of building heights, respecting and responding to the established townscape hierarchy. Building height and massing should be appropriate both in terms of the relationship with neighbouring buildings (immediate context) and the relationship with the wider context (townscape/skyline). The Council considers that development of around 7 to 10 storeys would be appropriate on Elmfield Road, subject to townscape impact and detailed design considerations.
- 8.20 Elmfield Road slopes down from north to south, which should be a key factor determining suitable building heights and massing. Heights should be stepped gradually following the topography; the transition in heights from north to south should be proportionate to that of the neighbouring buildings (which may include schemes which have been permitted but not yet built).
- 8.21 Buildings should step down to the east to provide a transition in scale between the taller elements of the town centre and the low-rise residential properties east of Kentish Way (Palace Estate).
- 8.22 All development proposals which come forward should accord with the following key principles:
- Improve permeability through the sub-area (in accordance with inclusive design principles) by exploring the potential for new connections to improve pedestrian and cycling access and create a pleasant, easily navigable environment.
 - Respond appropriately to the established townscape hierarchy to create a considered and coherent transition in scale from north to south and east to west.
 - Provide active frontages to animate the public realm on Elmfield Road and appropriate design measures to mitigate the impact on amenity from Kentish Way.
 - Adopt an integrated 'joined-up' approach to delivering landscape/public realm improvements on Elmfield Road by engaging with neighbouring landowners where possible.
 - Incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity. Opportunities to improve the pedestrian environment with street trees and urban greening should be maximised.

Figure 10: The Glades & Elmfield Road sub-area



The Glades & Elmfield Road Sub Character Area



© Crown copyright and database rights 2023. Ordnance Survey 100017661

Civic Centre / Palace

- 8.23 The Civic Centre / Palace sub-area encompasses the Bromley Civic Centre buildings and their surrounding grounds. The Civic Centre site includes the Old Palace, a Grade II Listed Building, and several other listed structures which are currently on Historic England's Heritage at Risk register. It also includes Ann Springman and Joseph Lancaster Halls (informally known as the 'Y Blocks') which were constructed in the 1960s and have been used for civic uses. Prior approval for change of use from office to residential use was granted in 2021³⁰.
- 8.24 The Civic Centre / Palace sub-area includes Local Plan site allocation 1, Bromley Civic Centre, Stockwell Close. Local Plan policy 1 and appendix 10.2 set out expectations for the site, split into three parts (A, B and C):
- Part A - Partial redevelopment of the northern section for civic centre facilities, offices and related activities. Retention of North Block, the Stockwell Building and the multi-storey car park.
 - Part B - Development of the central section for around 70 residential units, including the sensitive reuse of the Grade II listed Old Palace.
 - Part C - Retention of the south-eastern section as a public park.
- 8.25 The Old Palace grounds are designated as an Urban Open Space in the Local Plan, as they provide an important break within the surrounding built-up area. The eastern part of the grounds is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 45). A designated SINC covers the majority of the area.
- 8.26 The allocation also expects proposals to retain public access across the site from Stockwell Close and Rafford Way and to minimise impacts on the Urban Open Space, Local Green Space, SINC and listed buildings. Improved pedestrian and cycling connections to the palace grounds, particularly from the main part of Bromley Town Centre to the west, is a key objective, and should be prioritised as part of any improvement works or as part of development in the vicinity. New connections should prioritise greening interventions and support improved biodiversity. Such improvements would ensure a significant positive impact on the local area's access to nature and open space, increasing the importance of the Old Palace grounds and their contribution to the wider town centre.
- 8.27 These improvements could also enable better integration of the Old Palace Grounds and Queens Gardens (within the Glades & Elmfield Road sub-area), which historically were part of the same landscape. Kentish Way is a significant barrier to physical integration of the spaces; however, through public realm works at street level to rebalance the space in favour of pedestrians and through provision of greening such as street tree planting, this could establish a strong visual continuity across Kentish Way.

Development opportunities

Site 1, Part A

- 8.28 Part A of the current site allocation includes the Civic Centre car park and several buildings in office and civic use. The current allocation seeks retention of these uses, although redevelopment may be acceptable.

³⁰ Planning permission reference: 21/03120/RESPA

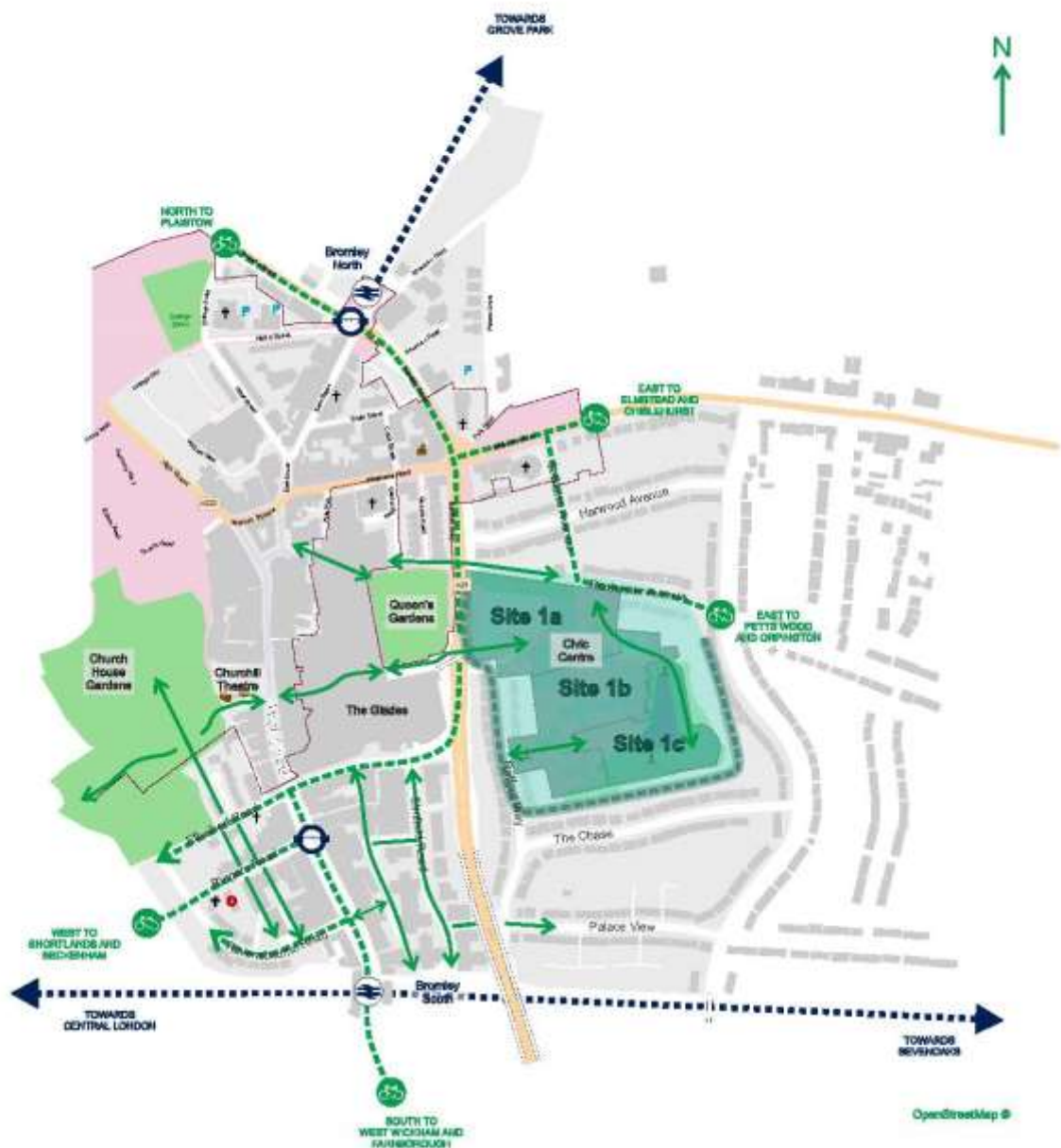
- 8.29 The site allocation seeks car parking for public use and for any future residents. The allocation pre-dates the London Plan which requires car-free development in Metropolitan town centres; therefore, it would be expected that any future residential units would be car-free (with the exception of disabled parking provision). In terms of the existing public parking, loss of existing provision may be acceptable, particularly where this would help to optimise development on the site and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 8.30 The site is adjacent to two storey semi-detached housing to the north and south. The Bromley Town Centre conservation area lies to the west (across Kentish Way) with the statutorily listed Bromley Old Palace and a designated SINC to the south-east. These constraints should form a key part of the design considerations of any future proposal on the site, particularly in terms of building heights. A maximum height of three to four storeys may be acceptable subject to appropriate scale and massing and detailed design considerations.
- 8.31 Redevelopment of this part of the allocation offers potential for improved connectivity across the Civic Centre site, particularly east-west connections. Connectivity improvements should be a key priority as part of any redevelopment.

Site 1, Part B

- 8.32 Part B includes the Old Palace and the Y Blocks. As set out in the allocation, the Old Palace should be retained, but sensitive re-use may be appropriate.
- 8.33 The Y Blocks has an extant prior approval permission to convert to 73 residential units. Any development of the Y Blocks, including extensions or larger-scale redevelopment, must have regard to the heritage assets in the immediate vicinity, particularly the Old Palace but also the various other listed structures; opportunities to improve the condition of these structures is encouraged, to enable them to be removed from the Heritage at Risk register.
- 8.34 The Urban Open Space designation means that any significant redevelopment must address policy 55 of the Local Plan. Where the replacement of existing buildings is proposed, any replacement buildings should not exceed the site coverage of the existing development.
- 8.35 The site constraints should form a key part of the design considerations of any future proposal on the site, particularly in terms of building heights. The current height of three storeys is considered generally acceptable, but there may be potential for a small increase in height up to four storeys - either through extensions or redevelopment - depending on the massing strategy, which should respond sensitively to the heritage setting, site topography, key views, and neighbouring residential properties.
- 8.36 Protection of the SINC should also form a key part of any development proposals. Measures to enhance the biodiversity value of the SINC should be investigated.
- 8.37 The introduction of new uses, particularly residential uses, must ensure a good level of amenity for future occupiers, for example, preventing or mitigating noise and disturbance.
- 8.38 Retention of public access across the site is a key requirement of the allocation. This is especially important in terms of access to the grounds, which are an important green and recreational asset for the town centre. Development of the Y Blocks could negatively impact on public accessibility by inadvertently creating a closed-off 'private' feel (real or perceived); such real or perceived barriers to access could reduce the wider use of the grounds. There may be an opportunity to improve the legibility of the existing public access route as part of future landscape proposals. Boundary treatments would require careful consideration.

8.39 Safety is also an important consideration; primary and secondary routes must be safe to use at various times of the day and night, utilising passive surveillance where possible. The provision of defensible space and privacy for any future occupiers of the Y Blocks would be a key requirement. It is essential that an appropriate balance is struck in order to achieve the aims of the allocation.

Figure 11: Civic Centre / Palace sub-area



Civic Centre / Palace Sub Character Area

- | | | | |
|---|--------------------|---|------------------|
|  | Sub character area |  | Site allocation |
|  | Conservation Area |  | Cycle route |
|  | Key connection |  | Urban Open Space |



© Crown copyright and database rights 2023, Ordnance Survey 100017661

9. Bromley South

Bromley South

- 9.1 This sub-area is focused around Bromley South Station, a key transport hub for the Borough with excellent connections to other parts of Bromley, Central London and the wider South East.
- 9.2 The station is included within Local Plan site allocation 10, West of Bromley High Street and land at Bromley South³¹. Local Plan policy 1 and appendix 10.2 identify the wider site allocation for 1,230 residential units, offices, retail and a transport interchange. Any proposals will be expected to incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location; improve Bromley South Station; provide a high-quality public realm and accessibility to and through the site; provide an attractive and active frontage to the High Street; and be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.
- 9.3 There are a number of office and commercial buildings in the sub-area, which are covered by a Business Improvement Area under Local Plan policy 84 (linking with the Business Improvement Area on Elmfield Road (within the Glades and Elmfield sub-area). The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.
- 9.4 The sub-area also includes a large Waitrose store with associated parking, and Bromley South police station and a number of commercial buildings along Mason's Hill. 1 Westmoreland Road is an allocated site for education in the Local Plan (Site 30).
- 9.5 There has been a significant amount of residential development within the sub-area in recent years, notably the 19 storey St. Mark's Square development to the west of the sub-area, and the 17 storey Perigon Heights development on St. Mark's Road. These new buildings form a gateway to the town centre when approaching from the southwest and southeast.
- 9.6 The Bromley Common Renewal Area begins on Mason's Hill close to the sub-area. Policy 16 of the Local Plan states:
- "Proposals within the Bromley Common Renewal Area will be expected to maximise opportunities to create a successful transition zone from Bromley Town Centre to the suburban and semi-rural urban fringe and produce a positive gateway to Bromley Town Centre along the Hayes Lane / Homesdale Road / A21(Bromley Common) junction, supported by appropriate green infrastructure."*
- 9.7 Policy 14 of the Local Plan concerns development affecting Renewal Areas, which could apply to proposals within the Bromley South sub-area. Development close to Renewal Areas are required to demonstrate that they maximise their contribution to economic, social and environmental improvements in the Renewal Area.

³¹ The remaining (majority) part of the allocation is within the High Street sub-area.

- 9.8 The sub-area includes the Grade II listed former St. Mark's School and the locally listed St. Mark's Church. Development within sub-area should also respond to the need to preserve or enhance views as set out in the Local Plan, especially to Keston Ridge.
- 9.9 The sub-area features a mix of architectural styles and building heights. There may be opportunity for further tall buildings (6 storeys or 18 metres, and above) at the Waitrose site (see below). In other locations within the sub-area, buildings of up to six storeys may be acceptable, depending on proposed massing and consistency with other design policy requirements. Development proposals which seek to exceed this height would require a strong townscape justification. Any development must reflect the heritage assets at the south of the sub-area and the impact on local views. The sub-area immediately adjoins a large area of two storey residential properties which have a distinct suburban character; this character must also inform consideration of appropriate building heights.
- 9.10 A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where buildings come forward for redevelopment. This approach may be particularly suitable for buildings to the west of the sub-area, including Churchill Court.
- 9.11 Opportunities for improving pedestrian and cycling connections should be prioritised, both north-south connections to the rest of the town centre and improved connections to adjoining areas to the south of the town centre. Currently, the existing road layout acts as a barrier to connections from the south, particularly on Mason's Hill at the Westmoreland Road and Kentish Way junctions. Local Plan policy 35 identifies A21/Mason's Hill/Westmoreland Road junction capacity improvements to tackle congestion and facilitate new development. New development in the sub-area may be required to contribute to delivery of these improvements.
- 9.12 Public realm improvements around the station, including provision of new public realm as part of any development of the Waitrose and Bromley Police Station site, are key to ensuring high quality design. Public realm improvements should also seek to incorporate green infrastructure. Existing and emerging development should be stitched together with a clear hierarchy of routes and spaces reflecting pedestrian movement patterns and desire lines, improving connectivity and the street level experience between the High Street, Bromley South Station, and Masons Hill.

Development opportunities

Site 10 (Bromley South station)

- 9.13 Site 10 is the key development opportunity within the sub-area, which is made up of a series of smaller sites. The majority of site 10 falls within the High Street sub-area; Bromley South Station forms the remainder of site 10.
- 9.14 The allocation expects proposals within the site 10 boundary to be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site. This SPD provides broad guidance which would help to fulfil part of this masterplan role, i.e. it sets out key design principles which development should accord with and guidance for the sub-areas which the allocation is within.
- 9.15 Individual development sites within the site 10 boundary should not be designed in isolation; development proposals will be expected to demonstrate that they have considered the site in question holistically in order to deliver the allocation requirements, setting out clearly how each site relates to other existing sites within the site 10 boundary including sites which have permission or plans to redevelop. There is no set form that this information should take, although it is expected that it should include evidence of engagement with relevant landowners of other sites. Use of visuals and 3D modelling is encouraged to clearly indicate

the relationship that a proposed development will have with other existing and planned development in the allocation boundary.

- 9.16 Bromley South Station is a civic focal point within the town centre, where many town centre visitors arrive. High quality public realm is therefore a key priority, potentially through the creation of a public square, to strengthen the role of the station as a civic space and to support improved connections to the south. The principle of small-scale retail and leisure uses fronting improved public realm is supported.
- 9.17 In terms of larger-scale redevelopment of the station, this is supported in principle but would be a longer-term proposal given the complex nature of the site and the need to mitigate impacts on the operation of the station. Potential for mixed-use redevelopment will be explored as part of the preparation of the new Local Plan, in discussion with Network Rail and other key stakeholders.

Waitrose and Bromley Police Station

- 9.18 New development proposals should acknowledge that the surrounding context is changing significantly and respond accordingly. These sites should not be seen as stand-alone sites considered in isolation; they are part of a larger urban block which is evolving. The historic prioritisation of vehicular movement, blank building frontages which 'turn their back' on adjacent developments, and peripheral public realm spaces are no longer appropriate. Proposals which seek to simply replicate existing site conditions will not be supported.
- 9.19 Pedestrian movement should be a key driver in determining the optimum site layout for future development proposals, which should reflect desire lines and movement patterns based on both the existing and emerging context. It is important to establish a clear hierarchy of routes; movement to and through these sites is key and should align with the wider urban design objective of improving connectivity (and street level experience) from the station to Masons Hill.
- 9.20 The ongoing operation of Bromley Police Station should not be adversely impacted by development proposals in the vicinity. In particular, issues relating to public realm and site access arising from new development should be addressed, to ensure that the police station can continue to function, and to ensure the safety of users and occupiers of new development.
- 9.21 Careful consideration should be given to the relationship with any recently permitted or constructed neighbouring residential/mixed-use schemes – e.g. Perigon Heights - in terms of layout, height, scale and massing. In response to the emerging context, there is an opportunity to rethink the existing Waitrose store servicing access arrangements and vehicular access/roads serving the Police Station to align more closely with the changing character of St. Mark's Road and new public realm spaces.
- 9.22 The opportunity for taller buildings marking the station and edge of the town centre to signify a sense of arrival at Bromley South is accepted in principle subject to detailed design considerations. The Council considers that the Waitrose site could potentially accommodate taller buildings as townscape and wayfinding markers. However, building heights should step down towards the eastern and southern edges in response to the lower rise character of the High Street and Masons Hill environs.
- 9.23 The height, scale and massing of new development proposals should respond to both the immediate site setting (establishing an appropriate relationship with existing buildings) and the wider townscape context of Bromley Town Centre (recognising existing townscape principles/tall building hierarchy and safeguarding key views).

Site 30

- 9.24 Site 30 – 1 Westmoreland Road – is allocated, in whole or in part, for education use. A mix of uses including education may be suitable on the site; given the Business Improvement Area designation of the site, offices uses should be prioritised. An element of residential use may also be suitable.
- 9.25 Where education uses are provided as part of a mixed-use development, there must be clear evidence that the different uses on site can function effectively, without adverse impacts. Partial education use should not be tokenistic and should address education needs in the borough. The Council will expect applications to be accompanied by evidence of education need, including evidence of discussions with the Council’s Education Team as well as any other relevant stakeholders.
- 9.26 Proposals including no education provision would not address the site allocation and would also be contrary to Local Plan policy 27(b), which safeguards such allocations for education purposes for the period of the plan. The Council is commencing a review of the Local Plan which will include a review of existing site allocations; however, proposals for alternative uses in the meantime would need to be supported by robust evidence demonstrating that circumstances have changed since the allocation was adopted and that the loss of the site will not impact current or future education needs. Any evidence submitted must include evidence of discussions with the Council’s Education team as well as any other relevant stakeholders; such evidence could be a material consideration with regard to the non-provision of education uses.
- 9.27 There is an opportunity for new development proposals to improve the relationship with the street (with an active frontage and permeable links); respond to the emerging context of Bromley South and provide an appropriate gateway marker to the High Street (with appropriate scale and massing); and to transform the existing car-dominated setting (with high quality landscape and amenity space).
- 9.28 The geometry of the site may lend itself to one or more blocks; where larger linear blocks are proposed efforts should be made to break up the massing whilst maintaining a strong relationship with the street. The need to retain access to a culvert running through the centre of the site is a key constraint that would need to be considered.
- 9.29 The site is a key node where the High Street, Westmoreland Road, and Masons Hill intersect and is therefore considered to be a suitable location for a taller element to provide a visual marker – marking the end of the High Street. The Council considers a maximum height of 8-9 storeys to be appropriate for this setting in order to mediate between the surrounding contrasting scales (subject to detailed design considerations).
- 9.30 Building heights should step down towards the east and the south to respond to the surrounding low-rise context, breaking up the massing with variations in height to avoid the perception of a large ‘barrier’ block fronting Sandford Road. It is also important to consider the relationship with the adjacent Grade II listed former St Mark’s School to the east; a maximum height of 3 storeys is considered to be appropriate adjacent to this heritage asset. The tallest element should be located to the north of the site and clearly delineated from other elements of the building(s) creating a visual marker from the High Street.
- 9.31 Opportunities to improve the public realm with urban greening should be maximised. There may be potential to create a permeable green link through the site to improve pedestrian connectivity between Masons Hill and Sandford Road; however, careful consideration would need to be given to the treatment of public and private space thresholds.

Figure 12: Bromley South sub-area



Bromley South Sub Character Area

- | | | | |
|---|--------------------|---|------------------|
|  | Sub character area |  | Site allocation |
|  | Conservation Area |  | Cycle route |
|  | Key connection |  | Urban Open Space |



© Crown copyright and database rights 2023. Ordnance Survey 100017661



Bromley Town Centre Supplementary Planning Document

Strategic Environmental Assessment Screening
Statement – July 2022 (with post-consultation
update August 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. Bromley Town Centre SPD

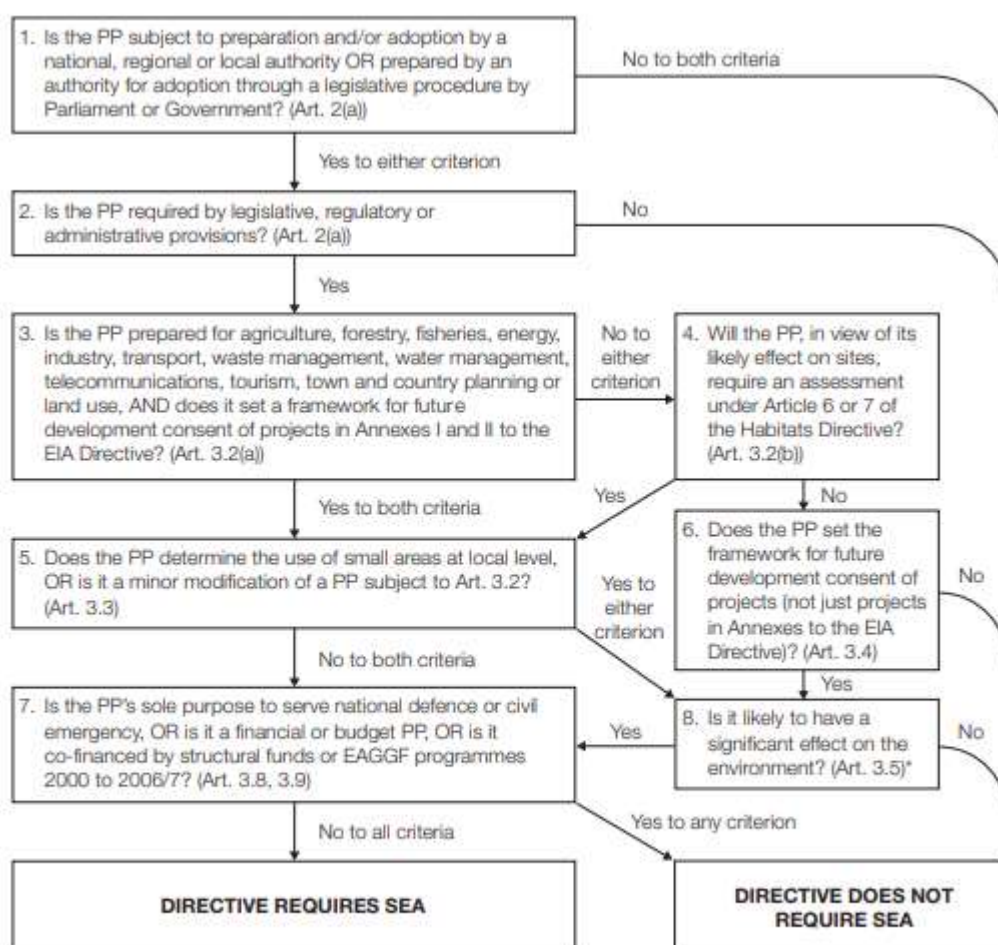
- 2.1. The Bromley Town Centre SPD provides guidance on the interpretation of adopted planning policies as they relate to the Bromley Town Centre area.
- 2.2. The SPD sets out a number of design principles derived from existing Development Plan policies and national policy:
 - Contextual (Character and 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 Bromley Town Centre 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, prior to consultation on the draft SPD; details of their responses are provided at Appendix 1.
- 3.4. The Council then 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.
- 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 Bromley 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 Bromley Town Centre 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). The SPD does set out character areas within Bromley 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.
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 Bromley 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 draft Bromley 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 Bromley 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 Bromley 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 Bromley 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 Bromley 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 Bromley Town Centre Conservation Area.</p> <p>Bromley Town Centre includes SINC designations at Church House Gardens and the Old Palace grounds. The Development Plan has policies which protect SINCs; the SPD will assist with the implementation of these policies.</p> <p>Bromley Town Centre is within an Air Quality Management Area and part of the Town Centre is identified as an Air Quality Focus 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 Bromley 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 Bromley 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 draft 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 draft 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 draft Bromley 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

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><u>Screening Request: Strategic Environmental Assessment</u></p> <p>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 the 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 <u>significant</u> 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</p>	Noted

Consultee	Response	LBB comment
	<p>SA/SEA is necessary.</p> <p>Please note that Natural England reserves the right to provide 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.</p> <p>This includes any third party appeal against any screening decision you may make.</p>	

Appendix 2: responses to draft SPD that relate to SEA

Consultee	Response	LBB comment
Environment Agency	No comments provided on SEA screening statement.	N/A
Historic England	We can confirm that Historic England agrees with the Council's assessment of SEA and do not consider that the proposed SPD would have sufficient outcomes to require full SEA and the guidance set out in the document provides further advice on how existing policies should be interpreted and implemented.	Noted
Natural England	A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.	Comments noted. The Council considers that an SEA is not required, as set out above.

This page is left intentionally blank

Bromley Town Centre Supplementary Planning Document

Regulation 12(a) Consultation Statement

August 2023

1	Introduction	1
2	Preliminary consultation information	2
3	Preliminary consultation responses	4
4	How have the issues raised in the preliminary consultation informed the draft SPD?	9
5	Draft SPD consultation information	13
6	Draft SPD consultation responses	14
7	How have the issues raised in the draft SPD consultation been addressed in the final SPD?	21
	Appendices	36
	Appendix 1: summary of preliminary consultation responses, by theme	36

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 draft Bromley 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 The 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 database.
- 2.3 The consultation sought views from a broad range of individuals and organisations on how the Council should guide the development of Bromley Town Centre.
- 2.4 809 representations were received; 781 were received online through the Commonplace portal, and 28 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:
 - Future of Bromley Town Centre
 - 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 Bromley, and for others to agree with comments made. Whilst

¹ Bromley Town Centre SPD, Commonplace webpage, available from: <https://bromleytowncentre.commonplace.is/>; and <https://bromleytowncentremap.commonplace.is/>

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.
- 2.9 Of the online responses (excluding the broad responses under 'General Comments') the 'Transport and infrastructure' theme received the most representations.

Table 1: Response rate to Commonplace consultation, by theme

Specific Topic	Responses	% of Responses
Environment and air quality	78	13
Transport and infrastructure	98	16
Green infrastructure	88	14
Housing	58	9
Retail, culture and leisure	55	9
Development opportunities	55	9
Historic environment	38	6
Public realm, permeability and connectivity	33	5
Offices	31	5
Future of Bromley Town Centre	84	14
Total	618	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. A detailed summary of the representations can be found at Appendix 1.

General comments

- 3.2 A number of representations noted the need for future developments to be flexible and adaptable, resilient to changing circumstances but also able to respond to and support change; it was considered that the SPD should advocate such development. The importance of enhancing local character and local distinctiveness was highlighted in several comments. A number of responses suggested that the SPD should promote carbon reduction and active travel, and protect natural resources which could lead to increased use of sustainable transport modes and provide economic benefits for the town centre.

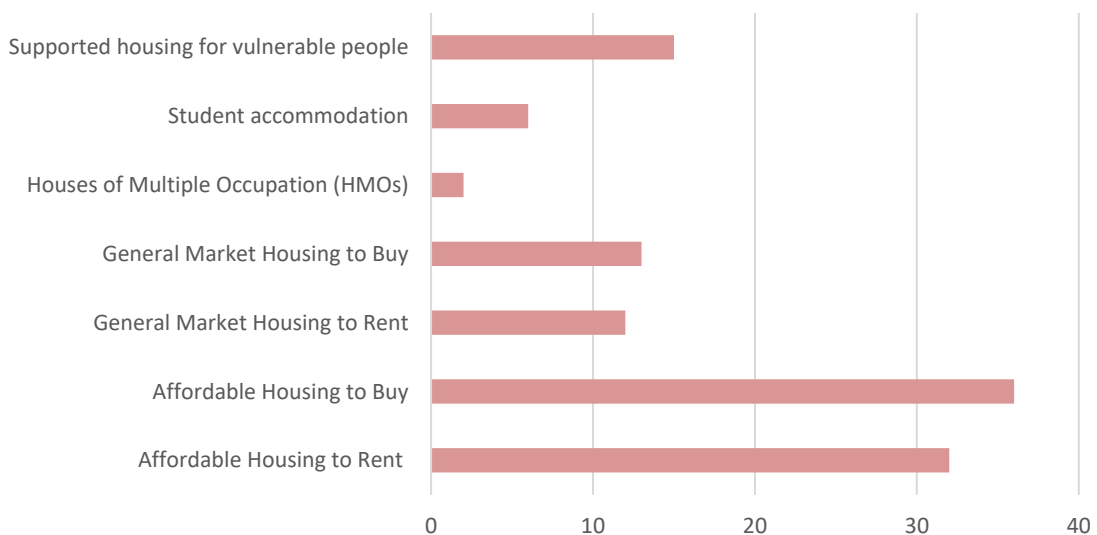
The future of Bromley Town Centre

- 3.3 Numerous representations under this heading were also covered in more detail in the particular themes.
- 3.4 Representations suggested that there needs to be greater provision of higher quality, lower density development in the town centre.
- 3.5 There should also be better integrated transport systems such as cycle lanes, pedestrianised areas and car free zones to ensure that there is better accessibility for visitors. The support for a proposed Bakerloo Line Extension to Bromley came through as a strong theme.
- 3.6 The importance of sustainability was highlighted in a number of responses, to ensure that the town centre can become more environmentally focused through the promotion of sustainable travel and implementing an energy strategy to ensure that unnecessary lights are switched off overnight and providing more recycling and refuse facilities.
- 3.7 Flexibility was also a key theme. Retail/commercial, heritage, and community facilities have been highlighted as core functions of the town centre. Improvements to the high street that allow the local food market to thrive and provide better opportunities for start-ups and creative retailers to animate the night-time market were raised. The town centre should remain respectful to existing heritage assets. 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.
- 3.8 General comments submitted have also highlighted the need for an enhanced communication system from the London Borough of Bromley to community organisations.
- 3.9 The importance of preserving and providing more green infrastructure was raised in several comments.

Housing

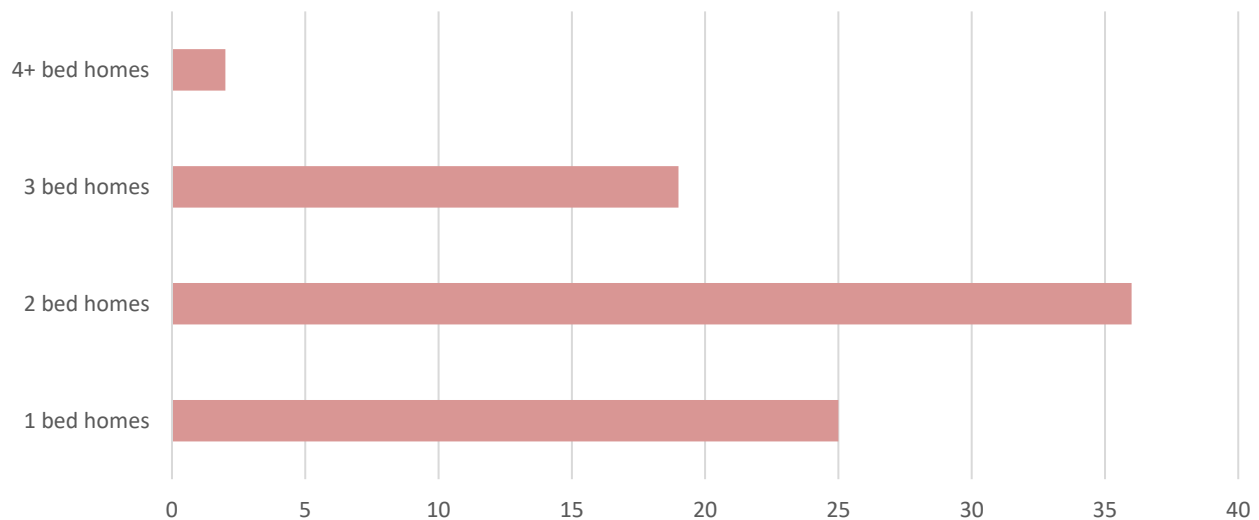
- 3.10 To best accommodate residential development within the town centre to complement the commercial role of the centre, it was suggested that the SPD should help identify massing opportunities and identify suitable building heights and design criteria to ensure no harm is done to protected character and appearance. This could be achieved by ensuring the Council has an allocation plan with criteria which embeds quality into development.
- 3.11 New developments should exceed minimum space standards and be sympathetic to the local area. Housing and commercial uses should be able to share spaces, with ground floors accommodated to businesses to make spaces open and connected.
- 3.12 Responses relating to existing vacant premises in the town centre suggested that conversions could provide valuable bedsits for homeless people or be provided as live/work centres.
- 3.13 The importance of supporting infrastructure for new homes was highlighted, notably transport and community infrastructure (e.g., health provision).
- 3.14 When asked what type of housing should be considered a priority, 31% of respondents thought that affordable housing to buy should be the most important. A further 28% thought that affordable housing should be prioritised as rented properties.

Figure 1: Responses on priority type of housing



- 3.15 74% of respondents thought that 1- and 2-bedroom properties should be prioritised in the town centre.

Figure 2: Responses on priority size of housing



3.16 In total, 58 comments were received referring solely to housing. It should be noted that housing has been referred to in comments set out in other themes. Most comments received were broadly in favour of residential development in the town centre.

Transport and infrastructure

3.17 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. There is also concern that the town centre has become too car reliant, leading to traffic levels which discourage public transport and cycling trips. Efforts should be focused on cyclists and walking as dominant modes of transport.

3.18 The need for an increase in active travel and improvements in public transport was also linked to concerns that existing infrastructure in the town centre is unsafe and inadequate and needs to be prioritised and re-established.

3.19 Comments also suggested that car parking in the town centre should be repurposed and reimaged to provide space for pedestrians, car clubs, secure cycling facilities and only keep car parking provision that is necessary.

3.20 Other improvements were suggested in the comments, such as agreeing to the Bakerloo Line Extension from Lewisham to Bromley and extending Tramlink and Docklands Light Railway. Bus connections could also be improved by linking up with the rest of the Borough, and increased frequency will encourage public transport use and reduce congestion.

Offices

3.21 There was a strong emphasis on redeveloping vacant premises in the town centre into shared working spaces to help promote and support changing working habits and new businesses.

Retail, culture and leisure

3.22 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 independent shops should be encouraged to set up in Bromley.

- 3.23 Comments were split on whether the town centre was seen as somewhere to socialise. Developments should deliver and support new places that combine social areas with eating facilities. Comments suggested there needs to be a better zone for the night-time economy, it is too sporadic and strung out.
- 3.24 Comments noted the need to maximise the flexibility of retail space to be used as a variety of commercial uses to reflect the direction of travel set out in the emerging Planning White Paper, which encourages flexible commercial space through the new Use Class E.
- 3.25 Complete or partial pedestrianisation of the High Street was suggested. It will lead to a clean, litter-free, well-maintained environment with more inclusive family-friendly activities. There needs to be a lot more creative thought put into the current offering for the town centre to thrive. Bromley council needs to value and promote lifelong learning as an antidote to loneliness, isolation, and antisocial behaviour.

Public Realm, permeability, and connectivity

- 3.26 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.
- 3.27 There was also support for the SPD guidance to ensure that existing infrastructure, such as the totem-pole lampposts, are no longer used as they are 'unpleasant and brutalist'.

Historic Environment

- 3.28 Respondents considered that the SPD should acknowledge the benefits of the historic environment and consider the impact that large developments will have on the local area. There were many comments supporting the notion that Bromley's unique character comes from the mix of historical buildings, green spaces, and architectural style and these should be preserved through SPD guidance.
- 3.29 Bromley Town Centre needs to better embrace its historic nature. Comments were in support of making information on the history of the town readily available to the public through notice boards and walking tours.
- 3.30 Whilst there was some support for high density development, there were suggestions that it should focus on refurbishment on existing vacant buildings and any new development should be limited to a certain number of storeys.

Green infrastructure

- 3.31 The importance of green infrastructure was highlighted throughout the responses and not just confined to responses to this theme. Emphasis was placed on the advantages, such as providing food and habitats for wildlife, cleaner air quality, and encouraging healthy behaviours.
- 3.32 There was a strong view that parks and green spaces should be protected, and green initiatives such as wildlife boxes, vegetable patches, trees, green walls etc should be encouraged within the local community to improve the public realm and feel of the town centre.
- 3.33 There were also suggestions that any new developments should not be allowed to impact on the open aspect of parks and gardens, so as not to spoil the green nature of the Borough.

Environment and air pollution

- 3.34 Comments generally sought a reduction in traffic along and around the High Street, with suggestions to reduce the speed limit to 20mph and discouraging unnecessary car use through the implementation of Low Traffic Neighbourhoods (LTNs). Incentives were also raised to encourage people who do not use public transport to switch to electric vehicles, encouraged by schemes that could give them free parking.
- 3.35 Improvements to the existing air quality were also frequently mentioned. Solar panels could reduce the energy carbon footprint of the town centre and businesses should be encouraged to conserve heat during winter months and not overuse air conditioning in the summer. The Council should also do more to encourage and incentivise businesses and households to become carbon neutral.

Development opportunities

- 3.36 The SPD should reinforce development to the south of the high street as a visual gateway and optimise the use of land and opportunity.
- 3.37 Bromley should be looking to present itself as an affluent and diverse borough by putting more effort into the town centre. Comments suggested that this could be done by encouraging low rise development and encouraging remote working hubs for local workers to improve the community feel.
- 3.38 The need for high quality design, in keeping with the surrounding area, was emphasised, along with retaining important parts of the high street i.e., the market.
- 3.39 Comments acknowledged that the historical culture of the town centre and pedestrianised high street and green spaces are integral to the character of the area. Any development proposed moving forward should be respectful to this.
- 3.40 Particular sites, such as East Street, Churchill Theatre and the Royal Bell were highlighted as the most characterful places in Bromley and should be the targets for conservation.
- 3.41 There is also concern that all existing Local Plan development Opportunity Sites by their location have serious and detrimental environmental impacts on the Conservation Area.

4 How have the issues raised in the preliminary consultation informed the draft SPD?

- 4.1 This section of the statement provides a summary of how the issues raised in the preliminary consultation have informed the 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 a Bromley Town Centre-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 Bromley context. Therefore, having first set out the policy framework within which the SPD would operate, the SPD also addresses the context of Bromley, 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 appendix (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 Bromley 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. The importance of protecting character and distinctiveness was an evident theme throughout the comments, although there were also a number of comments noting the need to diversify. 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. Comments were made on design, particularly with regard to high quality housing. The guidance note emphasises the importance of high-quality design developed through a detailed process of review and collaboration.
- 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. Public realm and connectivity was a popular topic for comments, with responses noting the need for greening of routes and for improved connectivity and access for pedestrians and cyclists.
- 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. Accessibility came up in responses to a number of themes and was raised in conjunction with responses noting the need for safer and greener routes.
- 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 air quality and comments noting the physical and mental health benefits of green infrastructure.
- 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 was a common issue raised by respondents, particularly in relation to sustainable design, sustainable transport and the sustainability benefits of green infrastructure.

Character areas

- 4.16 As noted above, the Bromley Town Centre context has informed the SPD character area boundaries. Guidance Notes 9 to 15 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 SPD (discussed below).
- 4.17 Guidance Note 9 relates to heritage and conservation issues, highlighting the importance of the historic environment in Bromley Town Centre 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; these responses highlighted the importance of local heritage in terms of its contribution to the area, and noted the importance of managing the impacts of development on local heritage assets, particularly with regard to tall buildings.

- 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 Bromley, in line with policy D9 of the London Plan. The guidance note references the importance of local views. The consultation comments on building height mainly focused on the need to limit heights; while the SPD cannot introduce maximum heights, it does set out the key policy requirements and provides guidance (in the character area sections) on what the Council considers to be appropriate heights.
- 4.20 Guidance Note 12 relates to Transport and connectivity in Bromley. It promotes enhancements to existing pedestrian and cycling routes and the creation of new routes, noting that improved east-west routes are a priority. The Guidance Note relates to a number of comments made across different themes.
- 4.21 Guidance Note 13 addresses green infrastructure and biodiversity in Bromley Town Centre. It promotes the enhancement of green spaces to address the identified deficiency of nature in the area. The importance of biodiversity was an issue that was raised across several comments.
- 4.22 Guidance Note 14 addresses sustainability concerns, reflecting adopted policy in the London Plan. Sustainability was a popular issue raised by respondents, with the encouragement of retrofitting 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 15 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. Flexibility for commercial/retail uses was a common theme in the consultation comments. 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

4.24 The SPD identifies the following character areas and sub-areas:

- **Bromley North**
 - Bromley North Gateway
 - North Village
 - North High Street

- **Bromley West**
 - High Street
 - Church House

- **Bromley East**
 - The Glades & Elmfield Road
 - Civic Centre/ Palace

- **Bromley South**
 - Bromley South

4.25 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 28 October 2022 to 27 January 2023, the Council consulted on the draft Bromley Town Centre SPD.
- 5.2 The consultation was publicised extensively, as follows:
- The draft SPD and supporting documents² were hosted on the Council SPD webpage³, with a link from the main consultation webpage⁴. 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 three weeks before the consultation deadline, and one as a final reminder several days 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 and the Glades shopping centre.
- 5.3 188 representations⁵ were received in total, as follows:
- 122 via email
 - 66 responses submitted via the Survey Monkey questionnaire on the Council's website
- 5.4 108 respondents (57%) could be identified as living in the Bromley Town Centre area (within BR1 and BR2 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 this document summarises the comments received, while Section 7 provides the Council's response to the comments.

² Supporting documents were a previous version of this consultation statement (detailing the information in sections 2 to 4, and appendix 1) and a Strategic Environmental Assessment screening statement.

³ <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

⁴ <https://www.bromley.gov.uk/consultations>

⁵ 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).

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 28 October 2022 to 27 January 2023, 188 consultation responses were received via email, in writing and via a questionnaire on Survey Monkey.
- 6.2 The issues raised by the respondents have been grouped into the following topics for the purpose of this consultation statement (NB: some respondents raised commented on more than one topic). Comments which did not fall under these topics are discussed in the general comments section.
- 6.3 Section 7 sets out the Council’s response to the issues raised in paragraphs 6.4 – 6.73.

Table 2: Response rate to draft Bromley Town Centre SPD consultation, by topic

Specific Topic	Number of responses to respond to this topic	% of responses to respond to this topic
Design, character	134	71%
Tall buildings	131	70%
Conservation, heritage	92	49%
Transport	45	24%
Social infrastructure	11	6%
Housing inc. Affordable Housing	33	18%
Environment and air quality	69	37%
Commercial uses (retail, leisure, office)	29	15%
Public realm, permeability and connectivity	35	19%

Design, character

- 6.4 Many respondents commented on the need to retain the character of Bromley Town Centre. Comments referred to Bromley being historically a market town, unique in that respect in south and south east London. Some respondents were very concerned that recent developments and future plans risk destroying this character and ruining the area; examples of recent development in Croydon and Lewisham were given as something to avoid.
- 6.5 Several respondents noted that recent developments have maximised development; a change to optimising development, sought by the London Plan, was supported.
- 6.6 Some respondents considered that the character area maps are poor quality.
- 6.7 Sport England suggested that the SPD include reference to Active Design.
- 6.8 “Retrofit first” – reusing and refurbishing existing buildings where appropriate - was supported by a number of respondents. One respondent asked whether retrofit investigation should be a stronger requirement.

- 6.9 The Metropolitan Police's Design out Crime officer notes that the town centre has higher crime than neighbouring wards and other town centres. The SPD should include Secured by Design concepts.
- 6.10 A local group noted that a masterplan is needed for Site 10. This should be done by the Council, not a developer.
- 6.11 Several respondents raised concern about fire safety with tall buildings – an incident at St Mark's Square was cited as justification for restricting tall buildings.
- 6.12 Several respondents suggested that any further external development of the Glades would be inappropriate; they considered that existing development was detrimental, robbing gardens of light in winter, and the Italianate garden has been lost to the development of under-used units. Only limited architectural enhancements to the Glades should be permitted.

Tall buildings

- 6.13 A number of respondents considered that tall buildings are not suitable for Bromley Town Centre and are particularly inappropriate near to the Conservation Area and other heritage assets. Respondents considered that tall buildings could have a negative Impact on Church House Gardens, Library Gardens and Martin's Hill, causing over-shadowing and ruining views across the valley.
- 6.14 Respondents suggesting setting limits on heights as the SPD guidance notes seem to give licence to create buildings that are too tall.
- 6.15 Several respondents including a local group stated that visual and heritage impact assessments should be done before any heights are established in the SPD; guidance note 11 should be amended to reflect this.
- 6.16 Comments were provided in relation to height guidance for specific development opportunities:
- With regard to Site 10 generally, respondents expressed concern that the guidance paves the way for very tall buildings, and considered that existing and proposed tall buildings should not set a precedent.
 - In relation to 1 Westmoreland Rd, a respondent noted the local impact of tall buildings on low rise residential uses close to the site, including on the operation of solar panels.
 - In the Bromley North Gateway sub area, several respondents considered that the heights of development on Site 2 should be determined by the impact on views and the Conservation Area, not by reference to Northpoint House which predates the designation and is detrimental. Respondents also stated that any development over 3 storeys would have negative impacts on the nearby low-rise residential area – over-shadowing, lack of privacy and security and the effect on house prices.
 - Conversely, developers and landowners of the Site 2 believed that the height parameters are too strict. The attempt to arbitrarily restrict heights and development capacity is contrary to D3 of the London Plan and the Local Plan site allocation, and a tall building is appropriate on this site. The respondent also considered that the site does not need to reference Northpoint House, it is large enough to define its own scale and character. Respondent submitted a basic site layout based on the SPD parameters to demonstrate their points.
 - Respondents considered that building heights for Site 3 in the North High Street area should be dictated by assessment of the impact on the Conservation Area, and that buildings should not exceed the tree height.

- In relation to Bromley High Street, a local group considered that heights of no more than eight storeys were suitable behind the shops along the High Street; taller blocks behind the frontage are not the norm. Guidance suggesting potential for greater heights should be removed. It was considered that development on the Churchill Quarter should not be proportionate to the Churchill Theatre.
- In relation to the Glades and Elmfield Road guidance, a number of respondents suggested that 12 storeys was not an appropriate benchmark for the Mall site – the current 12 storey building is highly intrusive.
- Commenting on the Bromley South guidance, respondents considered that there are already tall new buildings, Perigon Heights and St Mark's Place, which are detrimental to the area; there should be no more. Historic England suggested that guidance should be revised to include height parameters in order to preserve character and appearance or significance of heritage assets

6.17 Some respondents questioned whether, post-Grenfell, people would want to live in tall buildings due to fire risk. Others considered that tall buildings are not sustainable due to design, materials and costs of maintenance.

6.18 There was support for the principle of 'ensuring the form and massing of the buildings is set back from the main High Street frontage and sensitive to the ridge profile of the town centre topography'.

Conservation, heritage

6.19 Many respondents highlighted that the Conservation Area and other heritage assets are at risk from new development and should be better protected. There should be more reference to Local Plan and London Plan policies relating to conservation and heritage.

6.20 A local group suggested that the Conservation Area should have a dedicated Guidance Note referring to all relevant policies and Historic England guidance. The local group also suggested that Guidance Note 2 should also be strengthened by making reference to buildings of local heritage interest that are characteristic of the local area, together with a further description, aided by photos, of those 'heritage aspects' to which new development should refer. In addition, the group suggested that other references to the conservation area and heritage assets are added to other guidance notes, including Guidance Notes 3, 9 and 11. The group disagreed with the suggestion in the SPD that buildings harmful to the Conservation Area could be made acceptable by "set dressing" and detailing.

6.21 A local group suggested that all development proposals within or adjacent to the conservation area or affecting heritage assets should be subject to scrutiny by APCA. The group also suggested that there should be local heritage experts on the Bromley Design Review Panel.

6.22 Historic England supported the emphasis on strong architectural heritage and archaeological assets. They also suggested preparing an Archaeology SPD.

6.23 Historic England consider the first sentence of SPD2 requires 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.

6.24 One respondent considered that, overall, heritage and conservation are heavily prioritised over other goals. The respondent noted that it is important to value buildings and vistas, but the town has been transforming for a long time. We need to look to other examples, in different places and countries, where new development sits happily alongside heritage assets.

- 6.25 A local group consider that the decorative tilework on the Sainsbury's building is a valued feature of the Conservation Area, and the guidance should be revised to ensure this is retained or replaced in any development.
- 6.26 A local group noted that the description of the location of the Picturehouse in the North High Street section is not correct. The group considered that the cinema should be retained in its entirety and suggested that Martin's Hill be referenced as an important heritage asset.
- 6.27 A local group noted several buildings along Bromley High Street which are valuable Heritage Assets and which should be protected and considered for local listing. The group suggested that the High Street section should reference the Conservation Area. It was also suggested that an extension to the Conservation Area on the east side of High Street should be considered.
- 6.28 Several respondents noted that the guidance does not give enough weight to the Conservation Area and Library Gardens. Respondents also suggested that a visual and environmental assessment is needed to establish any potential impacts on the gardens, the Conservation Area and other heritage assets and their settings.

Transport

- 6.29 A number of respondents commented on transport issues, including the perceived lack of reference to the concept of "Active travel" in the SPD. TfL suggest that the SPD vision should have stronger reference to sustainable transport, and there should be a stronger reference to Healthy Streets throughout. TfL also suggested that high quality cycle parking should be supported, with reference to design standards.
- 6.30 A respondent considered that the SPD should take account of evidence and higher-level guidance including "Gear Change", a walking and cycling strategy published by DfT. There was also a comment suggesting that developers should commit to S106 funding for improvements. There was a suggestion to develop a tram up the high street – hop on and off.
- 6.31 Several respondents suggested that greater consideration of the wider cycling and public transport network is needed – getting into and through the town centre. Some respondents considered that the town centre cycling infrastructure is inadequate and unsafe, and that junctions prioritise cars. The SPD should include reference to recognised standards for cycle routes. Segregated cycle lanes should be designed in.
- 6.32 A respondent expressed concern about increased cycling provision, noting that people don't shop by bicycle.
- 6.33 It was noted that green networks can enable the creation of a walking and cycling network, not just environmental benefits.
- 6.34 Car-free development was supported by several respondents but it was noted that adequate provision was needed for those not able to use public transport. There was some support for the concept of 15 minute neighbourhoods.
- 6.35 Other respondents considered that parking is important for residents coming from outer areas of the Borough and that the Council should find a way of providing free car parking. One respondent stated that it was incorrect to assume that people living in apartments in the town centre won't have cars.

- 6.36 Respondents noted the existing parking stress along Babbacombe Road and nearby, in the Bromley North Gateway sub area, and considered that this will get worse without adequate parking as part of new development.
- 6.37 TfL supported the reduction of station car parking at Site 2 but suggested that the guidance mentions the need to retain and improve bus standing.
- 6.38 TfL broadly supported guidance on a number of development opportunities in various sub-areas, particularly where it was suggested that sites could
- 6.39 be optimised through rationalisation of parking.
- 6.40 It was noted that the SPD does not allow potential for any extension of the Bakerloo Line to Bromley. The Greater London Authority noted that the Bromley Town Centre Opportunity Area is within the Bakerloo Line Extension Growth Corridor.

Social infrastructure

- 6.41 A number of respondents raised the issue of social infrastructure, particularly noting concern that social infrastructure will not cope with more residential development – health education and community facilities are already under pressure. Respondents suggested that developer contributions from S106 and CIL should be put into new social infrastructure.
- 6.42 One respondent considered that health and wellbeing should be part of the vision for the town centre. Others suggested that more development will require further liaison with the NHS to ensure that the capacity of local health facilities is taken into account.
- 6.43 The NHS requested that major development proposals should be required to have a Health Impact Assessment, not just encouraged. Conversely, a developer stated that major development proposals should not be required to have a Health Impact Assessment as it is contrary to London Plan and Local Plan policy.
- 6.44 The Metropolitan Police Service raised an issue with the potential redevelopment of Waitrose at Bromley South, which could cause access problems which could severely impact the operation of the adjacent Bromley Police Station. They noted that no access agreement has yet been agreed and suggested that reference to giving pedestrians priority should be removed. The MPS considered that car free development will increase parking problems in the area which already cause risks to the emergency police response.

Housing

- 6.45 There were a mix of responses relating to housing. A number of respondents suggested that there should be no more housing in the town centre, as Bromley should be considered full. Some respondents recognised the need for new housing but considered that the town centre is not the place to locate it, it should be spread out across the Borough. Other respondents supported housing in principle, including at sites identified as development opportunities in the SPD.
- 6.46 Some respondents commented on suitable types of housing, suggesting that people don't want to live in tower blocks, especially after Grenfell. Some respondents considered that housing should be low-rise and include affordable and family housing. Others suggested that more flatted development should be developed to cater for the younger demographic.
- 6.47 One respondent suggested that offices should be converted into homes.

6.48 A respondent considered that new housing should be built to the highest environmental standard.

Environment and air quality

6.49 A number of responses related to environmental issues. Several respondents noted that the green and open spaces in the town centre are highly valued and must be protected. New development could harm these spaces. Church house and library gardens were identified specifically, and considered vital to provide environmental benefits and leisure opportunities. One respondent objected to the loss or change to the wooded area in Queens Gardens that provides a buffer to Kentish Way.

6.50 Several respondents suggested adding reference in the SPD to open space designations including Urban Open Space, Local Green Space and outdoor sport and recreation policies.

6.51 Some respondents considered that the Council needs to consider air pollution, congestion and climate change; this included comments stating that it is vital that green spaces should be preserved wherever possible to encourage wildlife and biodiversity. Some respondents suggested specific interventions - tree planting on the Bromley North station forecourt should be included, and the use of green walls in the High Street area.

6.52 A respondent considered that the meaning of “wildlife features of value” is unclear, and questioned whether should this be “habitats”.

6.53 There was a suggestion to expand Guidance Note 7 to include provision for long-term maintenance of green infrastructure.

6.54 A respondent considered that development should include sustainable infrastructure including solar panels and greywater harvesting.

Commercial uses (retail, leisure, office)

6.55 Several respondents suggested that no more commercial space is needed in the town centre, as there are already many empty premises in the town centre, including at the Glades.

6.56 Several respondents including a landowner considered that the town centre retail and leisure offer should be updated – attract new-style leisure and entertainment facilities, gastropubs, remove the market, establish clear zones for different activities. It was noted that retail has been resilient but there is decline in demand from retailers and SPD should reflect the transition. Amendments were suggested to wording regarding the retail-led function of the Glades; this was considered too restrictive there should be more flexibility for other uses - residential, leisure, office, community - to reflect changing times.

6.57 A landowner noted that the Council’s retail evidence base is out of date and a new study is needed.

6.58 Several respondents noted that Bromley North is good for a concentration of restaurants.

Public realm, permeability and connectivity

6.59 There were a number of comments relating to pedestrianisation in the town centre. Some respondents supported further pedestrianisation, making the town centre 100% pedestrianised, including the area north of Market Square. However, some respondents thought that more pedestrianisation could make it worse for some and less safe at night.

- 6.60 A number of respondents supported improvements to connectivity, lighting and signage across the town centre, to improve safety and access. Connections to nearby areas, outside the town centre, should be considered. A guide to the location of toilets and step-free access should be available.
- 6.61 One respondent noted that Guidance Note 4 should account for changes in the future – it may not be necessary to preserve existing patterns of permeability if new ones are created through comprehensive redevelopment. The respondent considered that the wording in Urban Design Guide SPD was more appropriate.
- 6.62 The intention to create a way through to Martin’s Hill, as set out in the North High Street guidance, was welcomed.
- 6.63 In relation to potential new connections in the High Street area, a respondent considered that there is no benefit to north-south connections parallel to the High Street.
- 6.64 Several respondents support the retention of public access from Stockwell Close and Rafford Way to the Palace Park, should redevelopment of the Civic Centre site take place.

General comments

- 6.65 A number of respondents suggested additional policy references within various guidance notes.
- 6.66 Some respondents suggested that consultation on the document was very poor, as with other recent plans including Churchill Quarter and Waitrose. The Council should hold proper meetings rather than drop in chats. Comments also suggested that developers should use modern IT techniques to demonstrate in 3D what their proposals will look like. The event in Orpington by Areli was given as an example of inadequate consultation in this respect.
- 6.67 Landowners of Site 2 within the Bromley North Gateway area noted that the principle of development and the site allocation is already established in the Local Plan. Additional comments were made on certain site parameters, including a suggestion that the Network Rail car park is underused. It was considered that the viability of development must acknowledge the cost of replacing the bus stand. The respondent suggested that the guidance in the SPD is at odds with adopted policy and suggested wording was put forward to rectify the perceived issues.
- 6.68 The GLA suggested that the SPD should clarify the boundary for the Bromley Town Centre opportunity area.
- 6.69 The potential development of Sainsbury’s car park was welcomed, as was the intention to create a link between College Green and Sainsbury’s.
- 6.70 Several respondents suggested that development in Church House Gardens should be clearly ruled out.
- 6.71 A developer stated that the Churchill Quarter development will make a positive contribution to the town.
- 6.72 A landowner considered that the Glades should be identified as a development opportunity in Section 8
- 6.73 One respondent noted that the vision should prioritise making the town centre a place for children and young people.

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.

Issues raised by consultation responses

7.2 Tables 3 to 12 below set out how the Council have addressed the consultation comments raised in section 6 (paragraphs 6.4 to 6.73) when preparing the final SPD.

7.3 There were a number of comments that concerned broad issues with the SPD format/structure, including a number of comments which suggested repeating various policies or guidance from the Local Plan, London Plan or non-statutory guidance documents. Many of the policies suggested would be relevant to development in Bromley Town Centre, 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.

7.4 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.

7.5 Several 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 plan⁶ to shape the development of new policy.

7.6 There were also a number 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

⁶ 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>

actioned, the relevant departments will now be aware of the comments and can consider them as part of their ongoing work (where appropriate).

Table 3: Design, character

Response	How has response been addressed?
Many respondents commented on the need to retain the character of Bromley Town Centre.	<p>Change – the Council agrees with the respondents regarding the importance of protecting local character. The SPD already reflects these important points, but further policy references have been added to emphasise this further.</p> <p>Development is suitable in principle in the town centre, and the role of the SPD is to ensure that this development is optimised but taking into account key constraints.</p>
Some respondents considered that the character area maps are poor quality.	<p>Change – all maps in the SPD have been updated.</p>
One respondent asked whether retrofit investigation should be a stronger requirement.	<p>Change - the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p>
The SPD should include Secured by Design concepts.	<p>Change – the Council agrees that ensuring safety through design is important. 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.</p>
A local group noted that a masterplan is needed for Site 10. This should be done by the Council, not a developer.	<p>Change – the Council recognises concerns about 'developer-led masterplans' which may not prioritise holistic benefits for the entire Site 10, but such masterplans are not explicitly precluded by the Local Plan site allocation. A single masterplan is not considered essential so long as there is consistency across masterplans that do come forward on separate sites. The SPD provides further guidance on the masterplan requirement which will help achieve consistency, noting the need for masterplans to reflect the design principles of the SPD. Any application and accompanying masterplan that does come forward will need to provide relevant assessments in line with London Plan policy D9 and the Urban Design Guide SPD. Reference to the Urban Design Guide has been added to the SPD.</p>
Several respondents raised concern about fire safety with tall buildings.	<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>

Response	How has response been addressed?
	<p>Some of the issues raised by respondents are covered by other regimes, particularly Building 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. Reference to the policy and draft LPG has been added to the SPD.</p>
<p>Several respondents suggested that any further external development of the Glades would be inappropriate; they considered that existing development was detrimental, robbing gardens of light in winter, and the Italianate garden has been lost to the development of under-used units. Only limited architectural enhancements to the Glades should be permitted.</p>	<p>No change – the SPD cannot limit development in principle, but it does set out guidance which would apply if development came forward at the Glades. This would ensure protection of heritage assets and amenity.</p>

Table 4: Tall buildings

Response	How has response been addressed?
<p>A number of respondents considered that tall buildings are not suitable for Bromley Town Centre and are particularly inappropriate near to the Conservation Area and other heritage assets. Respondents considered that tall buildings could have a negative Impact on Church House Gardens, Library Gardens and Martin’s Hill, causing over-shadowing and ruining views across the valley.</p> <p>Respondents suggesting setting limits on heights as the SPD guidance notes seem to give licence to create buildings that are too tall. Concern was raised about tall buildings creating precedent for additional tall buildings in the town centre.</p> <p>Several respondents including a local group stated that visual and heritage impact assessments should be done before any heights are established in the SPD; guidance note 11 should be amended to reflect this.</p> <p>Concern was also raised about the potential impact on local amenity.</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. The Urban Design Guide SPD provides additional guidance on tall buildings.</p> <p>There is no in-principle restriction on tall buildings in Bromley. However, 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</p>

Response	How has response been addressed?
	against relevant policy (including London Plan policy D9). The SPD has been amended to clarify this.
<p>In the Bromley North Gateway sub area, several respondents considered that the heights of development on Site 2 should be determined by the impact on views and the Conservation Area, not by reference to Northpoint House which predates the designation and is detrimental. Respondents also stated that any development over 3 storeys would have negative impacts on the nearby low-rise residential area – over-shadowing, lack of privacy and security and the effect on house prices.</p>	<p>No change – the indicative heights are considered reasonable and appropriately justified. 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>Conversely, developers and landowners of Site 2 noted that the principle of development and the site allocation is already established in the Local Plan. The respondents believed that the height parameters are too strict. The attempt to arbitrarily restrict heights and development capacity is contrary to D3 of the London Plan and the Local Plan site allocation, and a tall building is appropriate on this site. The respondent also considered that the site does not need to reference Northpoint House, it is large enough to define its own scale and character. Respondent submitted a basic site layout based on the SPD parameters to demonstrate their points. The respondent put forward suggested wording to rectify the perceived issues.</p> <p>Additional comments were made on certain site parameters, including a suggestion that the Network Rail car park is underused. It was considered that the viability of development must acknowledge the cost of replacing the bus stand.</p>	<p>Change – the indicative heights are considered reasonable and appropriately justified; a minor amendment has been made to clarify that a taller element could be around 10 storeys (rather than a maximum height of 10 storeys) but this is subject to detailed design consideration. Northpoint House is still identified as the key reference point for any taller building. The SPD does not seek to preclude the delivery of appropriately designed tall buildings; important factors to be considered in relation to siting and design are highlighted in the Urban Design Guide SPD which would also apply to any development proposal.</p> <p>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 SPD is not inconsistent with the Local Plan or London Plan; it does not restrict optimisation of the site to deliver a high density residential development.</p> <p>The Council notes that the Local Plan allocation capacity is indicative (not binding) and applies across the entire site. The site is now unlikely to come forward as a single site, as an application is being progressed on the Station Road car park site and other elements of the site (e.g. Northside House) are unlikely to be immediately forthcoming for inclusion in any development proposals for the remainder of the site. These are significant material changes</p>

Response	How has response been addressed?
	<p>which would undoubtedly affect site capacity, and therefore this should be taken into account when providing planning guidance for the site.</p> <p>The respondent notes that the guidance will restrict development capacity as identified in the Local Plan, but has provided no detailed evidence to support this; only vague evidence has been provided, seemingly based on limited consideration of different site layouts. None of the information submitted demonstrates that the SPD will stymie the development potential of the site in principle.</p> <p>Only vague assertions of viability issues have been put forward by the respondent. Consideration of viability could be a factor in the determination of any future planning application, where supported by detailed evidence.</p> <p>The site allocation seeks parking as part of the Site 2 redevelopment, but redevelopment of the Network Rail car park could be suitable if there is evidence that it is no longer needed for operational purposes. This would need to be justified as part of any future development proposal.</p>
<p>Respondents considered that building heights for Site 3 in the North High Street area should be dictated by assessment of the impact on the Conservation Area, and that buildings should not exceed the tree height.</p>	<p>No change – the indicative heights are considered reasonable and appropriately justified. 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>In relation to Bromley High Street, a local group considered that heights of no more than eight storeys were suitable behind the shops along the High Street; taller blocks behind the frontage are not the norm. Guidance suggesting potential for greater heights should be removed. It was considered that development on the Churchill Quarter should not be proportionate to the Churchill Theatre.</p>	<p>No change – the SPD parameters are considered reasonable and appropriately justified. 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>In relation to the Glades and Elmfield Road guidance, a number of respondents suggested that 12 storeys was not an appropriate benchmark for the Mall site – the current 12 storey building is highly intrusive.</p>	<p>No change – the indicative heights are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case</p>

Response	How has response been addressed?
	by case basis, assessed against relevant policy.
<p>Commenting on the Bromley South guidance, respondents considered that there are already tall new buildings, Perigon Heights and St Mark's Place, which are detrimental to the area; there should be no more. Historic England suggested that guidance should be revised to include height parameters in order to preserve character and appearance or significance of heritage assets</p>	<p>No change – the SPD parameters are considered reasonable and appropriately justified. 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>Some respondents questioned whether, post-Grenfell, people would want to live in tall buildings due to fire risk. Others considered that tall buildings are not sustainable due to design, materials and costs of maintenance.</p>	<p>Change – as noted above, fire safety is recognised as an important issue and reference to additional London fire safety guidance has been added to the SPD.</p>

Table 5: Conservation, heritage

Response	How has response been addressed?
<p>Many respondents highlighted that the Conservation Area and other heritage assets are at risk from new development and should be better protected. There should be more reference to Local Plan and London Plan policies relating to conservation and heritage.</p> <p>A local group suggested that the Conservation Area should have a dedicated Guidance Note referring to all relevant policies and Historic England guidance. The local group also suggested that Guidance Note 2 should also be strengthened by making reference to buildings of local heritage interest that are characteristic of the local area, together with a further description, aided by photos, of those 'heritage aspects' to which new development should refer. In addition, the group suggested that other references to the conservation area and heritage assets are added to other guidance notes, including Guidance Notes 3, 9 and 11. The group disagreed with the suggestion in the SPD that buildings harmful to the Conservation Area could be made acceptable by "set dressing" and detailing.</p> <p>Conversely, one respondent considered that, overall, heritage and conservation are heavily prioritised over other goals. The respondent</p>	<p>Change – The Council agrees with the respondents that protection of heritage assets is important. To reflect this, the SPD has a specific guidance note covering heritage and conservation (GN9) which will help to ensure that important heritage assets are fully considered as part of development proposals. It is not necessary to list all relevant heritage assets upfront in the SPD, or have a specific guidance note just for the conservation area. However, additional policy references have been added to the SPD where appropriate.</p>

Response	How has response been addressed?
<p>noted that it is important to value buildings and vistas, but the town has been transforming for a long time. We need to look to other examples, in different places and countries, where new development sits happily alongside heritage assets.</p>	
<p>A local group suggested that all development proposals within or adjacent to the conservation area or affecting heritage assets should be subject to scrutiny by APCA.</p>	<p>No change – while APCA can provide some useful commentary on certain planning applications, it is not a formal body and does not provide expert advice; it has no agreed terms of reference or formal structure. It is not a body that is conducive to the provision of objective, expert, independent advice (in the way that the Design Review Panel is). Therefore, it is considered inappropriate to refer to them within the SPD. APCA can continue to be consulted on planning applications without reference in the SPD; even if the SPD did refer to APCA, the SPD cannot mandate consultation with APCA.</p>
<p>A local group also suggested that there should be local heritage experts on the Bromley Design Review Panel.</p>	<p>No change - It is essential that the DRP is run as an independent, expert function, free from parochial views, 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 groups to sit on the DRP as a matter of principle, as there would be significant concerns about their lack of impartiality, and they would not be able to provide the same calibre of expert advice. Notwithstanding this, DRP membership is determined through a rigorous selection process facilitated by the Council's DRP provider. The DRP includes experts across a number of fields including heritage.</p> <p>The Council will explore the potential for setting up a community review panel in future, which has greater potential for involving individuals and local community groups to provide feedback on applications that may be of particular significance to local communities.</p>
<p>Historic England suggest that there is potential for a separate Archaeology SPD.</p>	<p>Change – the Council agrees with Historic England regarding the importance of archaeology. We consider that an additional SPD for archaeology is not necessary, but a reference to the Urban Design Guide SPD has been added which reinforces the importance of archaeology in Bromley. Reference to the</p>

Response	How has response been addressed?
	updated assessment of archaeological priority areas has also been added.
<p>Historic England consider the first sentence of SPD2 requires 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.</p>	<p>Change – the SPD has been amended to reflect suggested terminology.</p>
<p>A local group consider that the decorative tilework on the Sainsbury's building is a valued feature of the Conservation Area, and the guidance should be revised to ensure this is retained or replaced in any development.</p>	<p>No change - the Conservation Area SPG (cited in the SPD) refers to the decorative panels but does not set out whether they make a contribution to the CA. Activation of the frontage is considered to be a stronger priority, but activation could include elements that add visual interest to a building façade.</p>
<p>A local group noted that the description of the location of the Picturehouse in the North High Street section is not correct. The group considered that the cinema should be retained in its entirety and suggested that Martin's Hill be referenced as an important heritage asset</p>	<p>Change – the SPD has been amended to clarify the erroneous description and to recognise that there may be additional heritage assets that might be relevant to consideration of proposals for Site 3.</p>
<p>A local group noted several buildings along Bromley High Street which are valuable Heritage Assets and which should be protected and considered for local listing. The group suggested that the High Street section should reference the Conservation Area. It was also suggested that an extension to the Conservation Area on the east side of High Street should be considered.</p>	<p>No change – conservation areas and local listing cannot be identified through an SPD. The suggestions will be noted and may be considered in future when considering potential new conservation areas or additions to the local list.</p>
<p>Several respondents noted that the guidance does not give enough weight to the Conservation Area and Library Gardens. Respondents also suggested that a visual and environmental assessment is needed to establish any potential impacts on the gardens, the Conservation Area and other heritage assets and their settings.</p>	<p>No change – the Council agrees that these assets are important considerations. The SPD already provides sufficient guidance to ensure that these assets will continue to be protected. Potential impacts on any assets would be assessed based on a submitted development proposal.</p>

Table 6: Transport

Response	How has response been addressed?
<p>A number of respondents commented on transport issues, including the perceived lack of reference to the concept of “Active travel” in the SPD. TfL suggest that the SPD vision should have stronger reference to sustainable transport, and there should be a stronger reference to Healthy Streets throughout. TfL also suggested that high quality cycle parking should be supported, with reference to design standards.</p> <p>A respondent considered that the SPD should take account of evidence and higher-level guidance including “Gear Change”, a walking and cycling strategy published by DfT. There was also a comment suggesting that developers should commit to S106 funding for improvements. There was a suggestion to develop a tram up the high street – hop on and off.</p> <p>Several respondents suggested that greater consideration of the wider cycling and public transport network is needed – getting into and through the town centre. Some respondents considered that the town centre cycling infrastructure is inadequate and unsafe, and that junctions prioritise cars. The SPD should include reference to recognised standards for cycle routes. Segregated cycle lanes should be designed in.</p>	<p>Change – 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 to highlight the importance of these measures.</p>
<p>Other respondents considered that parking is important for residents coming from outer areas of the Borough and that the Council should find a way of providing free car parking. One respondent stated that it was incorrect to assume that people living in apartments in the town centre won’t have cars.</p> <p>Respondents noted the existing parking stress along Babbacombe Road and nearby, in the Bromley North Gateway sub area, and considered that this will get worse without adequate parking as part of new development.</p>	<p>No change – the SPD reflects parking policy set out in the London Plan; it cannot introduce new policy.</p> <p>The London Plan parking standard for Metropolitan Town Centres would be the relevant parking standard for Bromley Town Centre; this sets out a requirement for car-free development.</p>
<p>TfL supported the reduction of station car parking at Site 2 but suggested that the guidance mentions the need to retain and improve bus standing.</p>	<p>No change – the allocation and SPD already refer to the provision of a transport interchange, which is considered sufficient.</p>

Response	How has response been addressed?
<p>It was noted that the SPD does not allow potential for any extension of the Bakerloo Line to Bromley. The Greater London Authority noted that the Bromley Town Centre Opportunity Area is within the Bakerloo Line Extension Growth Corridor.</p>	<p>No change – the SPD is not relevant to the Bakerloo extension, notwithstanding the fact that the proposed scheme does not have an agreed business case or funding.</p>

Table 7: Social infrastructure

Response	How has response been addressed?
<p>A number of respondents raised the issue of social infrastructure, particularly noting concern that social infrastructure will not cope with more residential development – health education and community facilities are already under pressure. Respondents suggested that developer contributions from S106 and CIL should be put into new social infrastructure.</p>	<p>No 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, and is referenced in section 2.</p>
<p>The NHS requested that major development proposals should be required to have a Health Impact Assessment, not just encouraged. Conversely, a developer stated that major development proposals should not be required to have a Health Impact Assessment as it is contrary to London Plan and Local Plan policy.</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>The Metropolitan Police Service raised an issue with the potential redevelopment of Waitrose at Bromley South, which could cause access problems which could severely impact the operation of the adjacent Bromley Police Station.</p>	<p>Change – the Bromley South section has been amended to add specific reference to this issue, namely the need for any development proposals to ensure there are no adverse impacts on the function of Bromley Police Station.</p>

Table 8: Housing inc. Affordable Housing

Response	How has response been addressed?
<p>A number of respondents suggested that there should be no more housing in the town centre, as Bromley should be considered full. Some respondents recognised the need for new housing but considered that the town centre is not the place to locate it, it should be spread out across the Borough. Other respondents supported housing in principle, including at sites identified as development opportunities in the SPD.</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 9 set out what the SPD and other documents can do to ensure sufficient infrastructure is in place.</p> <p>However, the town centre is a suitable location for housing in principle. The London Plan identifies Bromley town centre as an opportunity area and as having ‘high’ 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>
<p>Some respondents commented on suitable types of housing, suggesting that people don’t want to live in tower blocks, especially after Grenfell. Some respondents considered that housing should be low-rise and include affordable and family housing. Others suggested that more flatted development should be developed to cater for the younger demographic.</p>	<p>No change – there are a number of potentially suitable types of housing that could be appropriate in the town centre, including tall buildings. Actual suitability would depend on the circumstances of individual sites. The Local Plan and London Plan includes policies relating to affordable housing; these policies do not need to be repeated in the SPD.</p>
<p>One respondent suggested that offices should be converted into homes.</p>	<p>No change – such conversions may be appropriate, but this would be established on a case by case basis; it would not be appropriate in all locations or on all sites.</p>
<p>A respondent considered that new housing should be built to the highest environmental standard.</p>	<p>No change - ensuring a high standard of quality for new homes is important. Policies set out in the NPPF, the London Plan and the Local Plan are effective at ensuring higher environmental standards than set out in the Building Regulations.</p>

Table 9: Environment and air quality

Response	How has response been addressed?
<p>A number of responses related to environmental issues. Several respondents noted that the green and open spaces in the town centre are highly valued and must be</p>	<p>No change – the Council agrees that these spaces are important, which is why the SPD has guidance to ensure their continued protection. Development in proximity to these spaces is not</p>

Response	How has response been addressed?
protected. New development could harm these spaces. Church house and library gardens were identified specifically, and considered vital to provide environmental benefits and leisure opportunities. One respondent objected to the loss or change to the wooded area in Queens Gardens that provides a buffer to Kentish Way.	unsuitable in principle, but such development would need to be designed appropriately.
Some respondents considered that the Council needs to consider air pollution, congestion and climate change; this included comments stating that it is vital that green spaces should be preserved wherever possible to encourage wildlife and biodiversity. Some respondents suggested specific interventions - tree planting on the Bromley North station forecourt should be included, and the use of green walls in the High Street area.	No change – the Council agrees that green spaces should be preserved and opportunities for new green infrastructure should be explored. The SPD includes guidance to ensure this.
A respondent considered that the meaning of “wildlife features of value” is unclear, and questioned whether should this be “habitats”.	No change – the term is considered sufficiently clear and covers a range of potential features which promote and protect habitats.
There was a suggestion to expand Guidance Note 7 to include provision for long-term maintenance of green infrastructure.	No change – Guidance Note 7 sets out guidance relating to securing new or enhanced green infrastructure. Details of how this would be secured and maintained are set out in the Planning Obligations SPD (which is referred to in section 2 of the SPD).
A respondent considered that development should include sustainable infrastructure including solar panels and greywater harvesting.	No change – new sustainable infrastructure is an important requirement. The SPD already refers to this in Guidance Note 14, reflecting policies in the London Plan in particular, which require all new development to include renewable energy generation, wherever possible, and other sustainable infrastructure.

Table 10: Commercial uses (retail, leisure, office)

Response	How has response been addressed?
Several respondents suggested that no more commercial space is needed in the town centre, as there are already many empty premises in the town centre, including at the Glades.	No change – there is no reliable evidence of high vacancy rates in the town centre. New commercial space is supported in principle although the type and scale of space provided could vary depending on specific development proposals. Notwithstanding this, Local Plan Policy 92 does allow loss of space where

Response	How has response been addressed?
	justified; it is not necessary to repeat this in the SPD.
<p>Several respondents including a landowner considered that the town centre retail and leisure offer should be updated – attract new-style leisure and entertainment facilities, gastropubs, remove the market, establish clear zones for different activities. It was noted that retail has been resilient but there is decline in demand from retailers and SPD should reflect the transition. Amendments were suggested to wording regarding the retail-led function of the Glades; this was considered too restrictive there should be more flexibility for other uses - residential, leisure, office, community - to reflect changing times.</p> <p>One respondent noted that the vision of the SPD assumes sustained demand for commercial floorspace which is over optimistic. The high street needs to find a new purpose, with more restaurants and bars.</p>	<p>Change - diversification of commercial uses, e.g. to include more leisure uses, is supported by the SPD. A minor change has been made to paragraph 8.7 to refer to 'commercial' function rather than 'retail' function, which reflects the potential for commercial diversification.</p>
<p>A landowner noted that the Council's retail evidence base is out of date and a new study is needed.</p>	<p>No change – the Council's retail evidence base will be updated as part of the Local Plan review.</p>

Table 11: Public realm, permeability and connectivity

Response	How has response been addressed?
<p>There were a number of comments relating to pedestrianisation in the town centre. Some respondents supported further pedestrianisation, making the town centre 100% pedestrianised, including the area north of Market Square. However, some respondents thought that more pedestrianisation could make it worse for some and less safe at night.</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>
<p>A number of respondents supported improvements to connectivity, lighting and signage across the town centre, to improve safety and access. Connections to nearby areas, outside the town centre, should be considered.</p>	<p>No change – the SPD highlights the importance of connectivity, which includes connections to the wider area (as set in Guidance Note 4 and its accompanying text).</p>
<p>One respondent noted that Guidance Note 4 should account for changes in the future – it may not be necessary to preserve existing</p>	<p>Change – Guidance Note 4 seeks connection with existing routes but the guidance would allow for flexibility in the case of</p>

Response	How has response been addressed?
patterns of permeability if new ones are created through comprehensive redevelopment. The respondent considered that the wording in Urban Design Guide SPD was more appropriate.	comprehensive redevelopment which removes existing routes entirely. The Urban Design Guide SPD would also apply to any development proposals; reference to the Urban Design Guide has been added to the SPD.
In relation to potential new connections in the High Street area, a respondent considered that there is no benefit to north-south connections parallel to the High Street.	No change – the Council disagrees with this view. Increased permeability and high standards of accessibility and inclusive design would be a significant benefit, especially in terms of Site 10 delivery, as it would help to stitch the individual sites together.

Table 12: General comments

Response	How has response been addressed?
Some respondents suggested that consultation on the document was very poor, as with other recent plans including Churchill Quarter and Waitrose. The Council should hold proper meetings rather than drop in chats. Comments also suggested that developers should use modern IT techniques to demonstrate in 3D what their proposals will look like.	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). The SPD encourages development proposals to use 3D modelling.
The GLA suggested that the SPD should clarify the boundary for the Bromley Town Centre opportunity area.	No change – it is not necessary to provide further clarity relating to the OA boundary, as Policy 90 of the Local Plan clearly sets out the OA boundary equates to the town centre boundary.
Several respondents suggested that development in Church House Gardens should be clearly ruled out.	No change – the SPD is clear that Church House Gardens is unlikely to see much, if any, development, but it cannot rule out development completely. The area is designated as Urban Open Space and a Local Green Space in the Local Plan, which would be relevant to any development proposals that did come forward.
A landowner considered that the Glades should be identified as a development opportunity in Section 8	No change – the SPD sets out some broad guidance for larger-scale development of the Glades in paragraph 8.9; this is considered sufficient detail for the SPD. Any plans for development at the Glades would be more suitable taken forward as part of the Local Plan review.
One respondent noted that the vision should prioritise making the town centre a place for children and young people.	No change – the vision applies across age ranges. The Local Plan and London Plan have policies concerning playspace and playable environments that would apply to development in the town centre;

Response	How has response been addressed?
	the SPD has reference to these policies in sections 7 and 8.

Appendices

Appendix 1: summary of preliminary consultation responses, by theme

Themes⁷

1. The future of Bromley Town Centre
2. Housing
3. Transport and infrastructure
4. Offices
5. Retail, culture and leisure
6. Public realm, permeability, and connectivity
7. Historic environment
8. Green infrastructure
9. Environment and air pollution
10. Development opportunities

1 The Future of Bromley (post covid)

84 responses received

What do you think makes a good Town Centre?

A good town centre has...

- Pedestrianised areas with shops and independent cafes and restaurants
- Unique styles to highlight different parts of the town centre
- Community policing
- Good transport infrastructure and minimal traffic
- A broad mix of uses and functions with connected accessible public realm and green space
- A café culture with outside space
- A wide variety of uses (not just shops)
- Safe cycle links to limit pollution
- Make Bromley a 'little London'
- Great retail options and a night time economy
- Bromley needs a modern landmark
- Good community engagement
- A visible and distinctive heritage and culture
- Regular and varied civic representation/information
- A library of things
- Facilities to allow people to recycle
- More activities/opportunities to draw people in, including volunteering

⁷ General comments received have been grouped into relevant themes for the purposes of this summary.

A good town centre is...

- Clean with no closed shops
- A place that allows businesses to thrive by creating a safe, accessible place to live and visit
- Accessible by walking, cycling and public transport
- A good mixture of recreation and retail space
- Mostly pedestrianised, encouraging cultural activities
- Safe and accessible by all transport modes
- A place that has good internet and wifi available to all space users
- Clean, safe, and inclusive
- Easily accessible

A good town centre should...

- Encourage active travel
- Make the most of individuality of the town rather than creating generic spaces
- Retain the theatre and entertainment facilities
- Encourage shopkeepers to take pride in the pavement space outside their shop
- Provide flexible and casual 'home office' spaces now that so many people working from home
- Provide play areas for children away from main roads
- Ban bonfires

What would you like your area to look like in the future?

Housing Development

- More mixed-use developments
- Keep new development low density
- Provide high quality accommodation
- Property should be local resident or council owned

Sustainability/Environment

- Reduce carbon dioxide emissions by encouraging sustainable travel
- Make Bromley Town Centre cleaner and more sustainable
- Promote and implement the Green New Deal
- Make Bromley Town Centre environmentally focused
- Ensure the parks are not strewn with litter
- Bromley Town Centre should focus on wellbeing

Heritage

- Preserve existing historical buildings
- Prominence should be given to the town centre's heritage
- There should be a greater emphasis on heritage
- The town centre should be respectful to existing heritage assets
- Make Bromley Town Centre cleaner and more sustainable

Transport

- Greener and more accessible active travel
- Better transport links
- Prioritise pedestrians and cyclists
- Area should focus on pedestrian and cycle experience
- Lower traffic and wider pedestrian access

Public Realm

- Increase the available landscaping to make the town greener
- Improve the public realm
- More water fountains
- Plant more trees and maintain existing trees (cutting back, cleaning up leaves etc)
- Clearly signpost the parks from the High Street and the Glades
- Increase planting through Bromley North

Open Space

- More outdoor spaces
- Preservation of the green environment
- Introduce some sheltered outdoor spaces
- More spacious areas

Retail/Commercial

- More outside seating (with heaters for winter)
- More independent retail, and more support for local businesses
- Encourage emerging businesses
- Environmentally friendly refill shops

Community Facilities

- Promote safer areas
- More community togetherness
- Make the most of existing assets such as Churchill Theatre and Queens Gardens
- More community activities
- Retain leisure and library facilities at affordable prices
- Increase small outdoor events
- Empty retail units being brought into use for community facilities such as pop-up shops and cafes, training opportunities for students or apprentices

What could the town centre offer that it does not already?

Transport

- Segregated cycle lanes
- A better system for walking
- More than one quick transport link
- Improved accessibility for elderly and disabled access to buildings, parks, pavements and crossings

- More car free areas and designated cycle routes
- Bakerloo Line Extension to Bromley
- A pedestrianised high street
- No more parking on East Street – give these spaces to shops and cafes to use as outdoor space
- Commitments to the concept of 20-minute neighbourhoods
- Increased parking costs to dis-incentivise driving into the centre

Sustainability/Environment

- More recycling and refuse facilities
- Solar panels on buildings
- Zero waste shopping
- An energy strategy to ensure that store lights are switched off over night
- Watering systems installed to protect existing planting
- Living walls to increase vegetation
- Plenty of water fountains to encourage people to fill their bottles and not purchase single use plastic bottles

Retail/Commercial

- Themed business days (once a month, stay open until 11pm)
- More upmarket shops
- Localised food market that only allows Kent produced products
- More free meeting places for local charities
- A roof top bar
- Improvements to the high street
- Provide opportunities for start-ups and creative retailers
- Provide more outdoor dining space
- More open-air cafes and outdoor entertainment
- Improved night-time market and animate the central area
- Solar panels on buildings

Community Facilities

- A community fridge
- A youth centre
- Permanent town centre police
- An auction house
- Community gardening and food growing project
- A mural on the side of Churchill Theatre
- More child play areas
- Christmas light trail in Palace Park; the nicer trees could have lights on their trunks and a lit-up float on the lake
- Work with Churchill Theatre to bring in more interesting productions
- Somewhere to work 'from home' away from home
- Utilise the open performance area in Church House Gardens for local musicians and theatre in the summer
- More interactive activities such as climbing walls, skating discos, laser shooting etc
- More indoor spaces for community and cultural activities

- Better interpretation and understanding of the town centre heritage
- Wi-fi service for those pedestrian areas not already served by the Glades
- New public toilets easily accessible from/in Church House Gardens

General Comments

- Better use of outside space
- Integrate nearby parks better with the central retail area
- No more high-rise blocks which invade privacy and are a blot on the landscape
- Improvements to Churchill Gardens to make it a cleaner, safer space

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?

General Comments

- Move forward with the Churchill Way applications
- Flexible re-purposing of planning uses
- There needs to be an enhanced communication system from LBB to community organisations
- Stop wasting money replacing herringbone brick with ugly white tiles
- Create a village feel with classy lighting rather than the current soulless ugly streetlights
- Employ planners to identify and consult on areas of the borough that would welcome development

Public Realm

- Provide drinking fountains
- Monitor levels of air pollution in the town centre
- Reinstate public-accessible toilets
- There needs to be more seating on the high street, especially sheltered seating
- Remove push-button walk signals and replace with zebra crossings
- Dead trees in boxes do not improve the street look. Replace them and pay for the upkeep
- Improve the public realm and make streets safer to walk and cycle

Community Facilities

- Bromley needs to become more community focussed
- Planning for recovery should encourage and enable community and cultural enterprises to take up empty retail properties
- Bromley Town Centre should offer something for local people working from home
- Promote cultural destinations
- Employ more police to ensure the town is safe
- There should be a community supported space for mums with pushchairs to socialise

Housing Development

- Less office space and more enjoyable living space. Convert unused office and retail units into new homes
- No more high-rise development

- Provide more housing
- If residents are threatened with compulsory purchase, then no new buyers are going to buy residential properties in the town centre

Open Spaces

- Improve the parks
- Consider small-enclosed garden areas that provide plenty of wildlife friendly planting
- Look for funding and plan to restore Queens Gardens, the Palace Park and Church House Gardens
- There should be clear and inviting routes into Queens Gardens and Churchill Gardens

Transport

- Encourage responsible cycling and cycle friendly schemes
- More should be done to encourage walking with more responsive pedestrian crossings
- Increase pedestrianisation to include East Street and the top of the high street beyond Primark
- Invest in active travel
- Pedestrian paths should be widened
- Relief roads are being used as racing tracks and is extremely dangerous
- There should be more speed restrictions and traffic cameras

Retail/Commercial

- Support local businesses
- Invest in office space for home workers
- Bigger store names are needed in Bromley
- Make it more affordable for businesses to flourish
- Give small retailers somewhere to send their product
- Take advantage of empty retail units to change the tone of the town centre
- Redevelop The Mall
- Shops should provide better disabled access
- More independent retail units
- Planning for recovery should encourage and enable community and cultural enterprises to take up empty retail properties
- The drive in the 2010 Area Action Plan is now part of the Local Plan calls for retail expansion at all costs and is now pointlessly destructive

2 Housing

58 responses received

How can we best accommodate residential development within the town centre to complement the commercial role of the centre?

- New developments should be sympathetic to the local area
- Good quality accommodation should exceed minimum space standards
- Existing and future retail businesses and charities need assistance and encouragement
- Discourage buy to let

- Be bold with the architecture
- Do not build any more high rise
- It would be good to identify an area for independent business space which is affordable
- Communal spaces should be as generously provided as possible
- More guidance on 'opportunity sites'
- Gentle densification of the satellite areas
- It is better to build upwards than build out and encroach the Green Belt
- Redevelop South of the high street as high-density town centre residential
- Identify massing opportunities and suitable building heights
- Support the creation of residential floorspace
- There needs to be better access to green and open spaces
- Ensure there is the necessary infrastructure in place to support new housing and facilities
- Limit car parking opportunities

What type of housing should be the priority?

- Affordable home to rent – 32 responses
- Affordable home to buy – 36 responses
- General market home to rent – 12 responses
- General market home to buy – 13 responses
- Homes of multiple occupation (HMO) – 2 responses
- Student accommodation – 6 responses
- Supported housing for vulnerable people – 15 responses

Is there a particular housing size that should be prioritised?

- One bed home – 25 responses
- Two bed home – 36 responses
- Three bed home – 19 responses
- Four+ bed home – 2 responses

Do you have any other comments in relation to housing in Bromley Town Centre?

Affordable Housing

- Can any of the long-term empty office spaces be converted into affordable housing?
- There is not enough new social housing

Housing Development

- Convert some of the empty office blocks into accommodation for the homeless
- Bromley Town Centre is the perfect spot for housing
- High density flatted development is considered the most suitable type of housing for this location
- Lower density development would not fully optimise previously developed brownfield land with excellent transport connections
- Heights of blocks should be limited
- All new builds need to have a balcony
- Do not remove existing housing stock

- Do not overdevelop what was once a lovely suburban town
- There should be a mix of housing types to encourage communities

Sustainability

- Convert some of the empty office blocks into accommodation for the homeless
- Bromley Town Centre is the perfect spot for housing
- There should be more provision for green spaces
- Surrounding parks should be revamped and cleaned properly
- Wildlife projects could encourage animals back to the area
- Solar panels should be added to new development
- All new developments should have rainwater tanks built in

3 Transport and Infrastructure

98 responses received

How important is walking, cycling, and public transport for the success of town centres?

Public Transport...

- Is vital as nobody wants to use a traffic choked Bromley Town Centre
- Will allow the town centre to attract visitors
- Is essential for health and air quality
- Is no more important than other transport modes
- Will make the roads safer and the street scene more pleasant
- Is important but people should not be forced to use bicycles
- Important to have cleaner air and reduce carbon footprint
- Should be an essential consideration in the town centres future

Bromley...

- Is vital as nobody wants to use a traffic choked Bromley Town Centre
- Will allow the town centre to attract visitors
- Has become too car reliant leading to traffic levels which discourage public transport
- Should focus their efforts on active travel as the dominant mode of transport
- Should supply more cycling safe stores around the town centre
- Should ensure there is sufficient infrastructure to encourage safe active travel
- Will be more attractive if it is car free
- Is unpleasant to drive around
- Has poor cycling infrastructure and needs segregated cycle lanes
- Needs to avoid a car-led covid recovery
- Is dangerous as cyclists try to travel through crowds of people

Sustainable...

- Methods of transport are needed to save the planet
- Modes should be encouraged but adequate car parking is needed to meet the need and support the function of the town centre
- Transport benefits local businesses

Other Comments

- Car parks take up too much space
- Improved access to the town centre will encourage increased use of existing facilities
- Active travel users spend 40% more time in local shops than motorists
- Active travel users are key to the prosperity of the town centre
- It is important that buses are more frequent to enable access for disabled people
- There should be more buses in circulation at peak times as it is too busy
- The decline in Bromley Town Centre is due to the rise in online shopping

What opportunities are there for new or enhanced walking and cycling routes in the Town Centre?

Walking

- Plan better walking routes to the town centre
- Increase pedestrian crossings by Shortlands Station
- More of the high street can be pedestrianised
- The A21 is really unpleasant to walk along
- Improve pavements around Ethelbert/Ringers/Ravensbourne Road for those walking into Bromley
- The walking potential between Shortlands and Bromley needs to be improved
- A signalled crossing at Westmoreland Road/Hayes Lane will make walking more accessible
- Dedicated walking routes should be established
- A detailed review of all access routes to the main high street needs to be done
- Pedestrianise the area from Bromley South all the way to the Picture House Cinema and restrict cars 100% during day hours

Cycling

- No more needs to be done, cyclists already have lots of space
- Cycling provision is currently disjointed and needs to be continuous
- Bromley is not cyclist friendly
- There needs to be a clear cycling route from Beckenham to Bromley
- Work with TfL to deliver more cycle routes along A21
- North/South cycle route on Kentish Way is poor
- Cycle lanes are confusing, intermittent and dangerous
- Better links to Waterlink Way
- Inadequate and poorly designed cycle routes
- Better cycling provision is needed on Westmoreland Road and Hayes Lane
- Cycle path along Kentish Way is unpleasant to use
- More bus lanes that cyclists can use
- Provide a route from Borough border along Burnt Ash Lane via Plaistow roundabout and Bromley North
- Junction at Masons Hill is dangerous for cyclists and needs to be redesigned

Other Comments

- Make roads safer
- More EV charging points
- Radical changes are needed to transport in Bromley

- Restrict visiting vehicles to the multi-storey car parks
- Create a more pleasant town centre that focuses on green spaces and sustainable transport
- Current transport provision is biased towards drivers
- More cycle spaces outside Bromley South
- Block off all known traffic rat runs in suburban roads to ensure car drivers only use main roads and not residential streets - let's making our streets community places again and not traffic jam nightmares

Does car parking have a role in future? Should development in Bromley Town Centre be car-free?

Car-Free

- All new development must be car free
- There is no need for more parking in Bromley
- Remove existing parking spaces to discourage parking
- Town centre residential development should not require parking
- On street parking should be re-purposed for outdoor seating and additional walking space
- More residential accommodation taking advantage of the public transport links
- Other modes, especially greener modes, should be given more inclusion future planning
- The town centre should be car free and there should be no more on-street parking
- There is a need for more taxi parking
- Existing public transport system is excellent and car clubs are becoming increasingly popular
- Car parking in the town centre should be repurposed and reimagined to provide space for car clubs, secure cycle parking, delivery hubs for cargo bikes and cycles

Pro-Car

- Not car free
- Many people rely on being able to park to access facilities
- Off-street parking for retail remains important
- Many people rely on their car for work so car parking is necessary
- Cars are still required in the town centre
- Car use is still important for disabled users
- Underground parking should be explored as an option to save on space
- Car parking must prioritise non fossil fuel vehicles
- Any new car parks should have plenty of EV charging points
- Public transport is not viable for many people
- Remove cars, remove business
- Bromley Town Centre will not attract a sufficient amount of users to sustain businesses without the provision of sufficient parking and infrastructure
- Electric vehicles should be encouraged

Mixed

- Car parking should be discouraged but still remain available
- There needs to be a better balance of provisions for all transport modes
- Parking should only be available for disabled drivers and families with young children
- EV charging points should not take up pavement space
- The two main supermarkets in Bromley should be able to retain car park spaces

Are there any improvements to public transport that you would like to see?

General

- Not car free
- I am very happy with Bromley's public transport infrastructure
- Transport is largely adequate
- Greener fuels
- Public transport is currently very good
- The centre should be majority public transport
- More EV charging points should be provided
- Hail and ride should be encouraged where it is safe
- More crossings and pathways with public spaces for relaxing with small architecture
- Re-open Palace View Road for taxi use and allow cars to use the link between Elmfield Road and Kentish Way
- There is scope for better links to some areas to draw in trade – e.g. parts of Sydenham, Forest Hill etc.

Bromley South Station

- Bromley South needs to be better
- Bromley South Station needs to be modernised
- 24/7 trains should run from Bromley South to London Victoria
- Bromley South Station is not a great gateway to the town centre
- There needs to be better access to Bromley South platforms
- It needs to be redeveloped so it is fit for purpose
- Improved access is needed in and out of the station – additional exits
- Better transport interchange at Bromley South for all modes
- Bromley South is very popular but overcrowded
- Bromley South station needs to be re-expanded onto Waitrose car park as, pre-covid, it was very overcrowded and dangerous at peak times

Bromley North Station

- Buses and trains through Bromley North could be improved
- Direct trains to Central London from Bromley North will reduce capacity at Bromley South and benefit surrounding shops
- Bromley North is grossly underserved and should have a direct service to Central London
- Bromley North Station should operate fully at the weekends
- Improve capacity on shuttle train to Grove Park
- Trains are often delayed in and out of Bromley which is never good
- Investment is needed to handle growth in rail travel

Bakerloo Line/Tramlink/Dockland Light Railway

- Extend the Bakerloo Line from Lewisham to Bromley via Beckenham and Shortlands
- The Council should agree to the Bakerloo Line Extension
- Extend Tramlink into Bromley
- Tram should be extended from Elmers End into Bromley

- Extend the Underground into Bromley Town Centre
- The DLR should come into the Borough

Cycling

- Allows bicycles on trains
- There needs to be more segregated cycle paths
- Invest in cycle routes
- More cycle parking/lock up points at train stations
- Facilitate cycling and make it more pleasant
- Car and cycle paths need to be kept separate
- There needs to be a new bicycle trail that is better regulated

Buses

- More bus lanes are needed along A21
- Lack of fast connections to Lewisham and Southwark - faster bus routes beneficial (less stops)
- Buses need to be more frequent
- Bring back cash payments on buses
- More bus shelters should be built
- Bus services should not be allowed to decline
- More buses should be running
- Electric buses and more direct routes to schools
- Buses struggle to get through to the High Street on north side due to cars parked along the road
- More buses are needed on many routes, especially school routes
- Increase buses at peak time
- TfL countdowns should be provided at all busy bus stops in the Borough
- There needs to be more continuous routes around the Borough without having to change
- Electric buses would help reduce air pollution
- All buses should be electric within 2 years
- Connections with Biggin Hill and rural Bromley must be improved

What do you think are the priority infrastructure requirements for Bromley Town Centre?

Cycling

- Safe cycling and pedestrian access to Bromley Town Centre
- Ensure cyclists are kept safe and visible on the roads
- More cycle lanes, better pavements and more areas to crossroads safely
- Investment in safe cycling infrastructure
- Ensure there is a cycle route from Market Square to Bromley South
- Remodelling of the road for proper cycle routes
- Improve road safety and cycle connections
- Introduce new green spaces and cycling infrastructure

Public Transport

- Relieve pressure on public transport
- Extend the Bakerloo Line to Bromley Town Centre

- Less encouragement to use cars
- Improvements need to be made to Bromley South

Walking/Pedestrians

- More public spaces to congregate, walk and browse
- Improve and widen pedestrian areas from Bromley High Street to Bromley South
- Living streets favouring pedestrians
- Make it easier to cross the A21
- More outdoor spaces for people
- Pedestrianising the town centre
- Access which prioritises active travellers
- The streets should be fully opened to people and the local businesses to provide more outside dining options

General Comments

- Create more LTNs
- Deliveries only at night
- Resolve congestion and waiting time at traffic light junctions
- The entire town centre should be car free
- Provide drop off/pick up areas for the Glades
- More EV charging points should be provided
- Reduce traffic down Queensmead Road by stopping it being a rat run from Bromley High Street
- The recent improvements to the public realm there have very much improved the look of the area however traffic volumes and behaviour are still a concern
- The re-development and expansion of Bromley Station is a priority (if commuting is re-established)
- The traffic impacts of the town centre need to be addressed

4 Offices

31 responses received

How can the employment role of the town centre be maintained and improved?

- Stop converting offices into flats and then building more offices
- There is little current need for office space in Bromley
- There is a massive opportunity to create more shared working spaces
- Help attract start-up businesses
- Redevelop current old office spaces into taller, modern spaces that will attract new businesses
- Promote and support new businesses
- Reduce business rates
- Promote flexible/short-term use of office space in empty properties
- Create spaces that can be used as hubs for their employees

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?

- Co-working
- Shared and flexible working spaces
- Low density offices
- Environmentally friendly workspaces
- New offices need to be modern to support the technological infrastructure required
- Short-term lets
- Flexible renting/leasing terms that will attract a wide range of businesses
- There are already vacant offices in Bromley
- Existing ad hoc spaces are already unaffordable
- The Town Centre should adapt by preparing to lose the businesses most supported by the office workers who have left or are leaving
- Include varied community working spaces across all sorts of industries not just traditional office work

5 Retail, Culture and Leisure

55 responses received

Does Bromley 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?

- Change policies to promote redevelopment of poor quality and redundant retail into residential
- There could be more done to introduce a variety of shops
- There has been far too much emphasis on chain store and restaurants
- Bromley needs more innovative local businesses and shops
- Less focus on restaurants at the price of public space
- Review Bromley's business rates and actively encourage independent businesses to set up in the centre
- The retail core area should be reduced
- Ensure empty shops are not left vacant for too long (offer discount)
- Get bigger names into the town centre
- It needs to adapt to changing circumstances
- Access for wheelchair users
- Ensure that the toilets in the glades are regularly cleaned/monitored
- Maximise the flexibility of retail space to be used as a variety of commercial uses in order to reflect the direction of travel set out in the emerging Planning White Paper, which encourages flexible commercial space through the new Use Class E
- Think about community spaces and venues that people can use to sell homemade items
- Stop cars driving down East Street so this could become a road of interesting places to eat and drink
- The Town Centre should develop more of a market town feel
- Small independent shops should be actively encouraged to set up in Bromley
- Bromley does not make enough of its historic links with HG Wells. The Bell is mentioned in Jane Austen's *Pride and Prejudice*
- The SPD should ensure there is adequate flexibility for local businesses so they can adapt to the ever-changing retail environment
- Encourage other enterprises such as a climbing wall or escape room to diversify from shopping that can be done online

- A wider range of cultural and leisure facilities, community facilities and workspaces for entrepreneurs, start-ups and small businesses are needed
- A more mixed-use environment, with not just shops, is needed as the traditional retail outlets are lost to online shopping
- Restore the parks and provide more seating
- Consider facilitating regular farmers markets in addition to the regular food markets in existence

Do you see the town centre as somewhere you can socialise?

YES – 18 Responses

- The cinema, theatre and bowling alley are excellent
- The restaurant terrace has not reached its full potential yet
- More seating is needed
- Emphasise the parks in the town as they are great to visit
- The coffee shops are good
- It is so much more than a shopping centre
- Good to see the market in the High Street
- The Town Centre is better than it used to be
- Somewhere to meet friends and family
- Church House Gardens and Queens Gardens
- Create venues that combine community art galleries, live music and eating facilities

NO – 18 Responses

- Bromley is not a place to be at night
- The retail places are places to socialise but the town centre is not
- Street furniture could benefit the parks
- Too given over to low end drinking
- The night-time economy is strung out through the centre. Priority zones should be identified
- Bromley is just a bunch of shops and old housing
- Too much focus on pubs and clubs
- Improve to include more high end, independent restaurants or gastro pubs
- Bromley South has a large Wetherspoons and a large restaurant / club that is constantly changing
- Lack of a family/social feel
- The restaurants in Queens Gardens help
- Bromley nightlife mainly caters to young people looking for cheap entertainment and fast food

What type of space is necessary to facilitate or improve the cultural and social role of Bromley Town Centre?

- Community hubs for vulnerable people
- Have the market in one place
- More places that offer music
- Nightclubs
- Invest in Bromley Little Theatre
- More trees and planters

- More cycling storage
- Leisure spaces closer to town
- Increase pedestrianisation
- Organise more diverse events
- High Street currently feels very sterile
- More inclusive family friendly things
- A medium/high end marketplace food experience
- Focus around a town square type central point
- Less car access
- More high density centrally located housing
- Better open spaces
- There are huge vacant spaces between Bromley North and South
- Provide free parking like Bluewater
- Bromley is diverse and an community art work may help just pull people together
- Youth centres
- Clean, litter free, well maintained environment
- A more socially and demographically diverse residential offer in the town centre

What leisure activities/facilities would you like to see in the town centre?

- The cinema, theatre and bowling alley are excellent
- The facilities already exist
- Somewhere for young people to go
- Better pubs for over 25s
- Yoga facilities (indoor and outdoor)
- Social meetings for older people
- Community art projects
- Park gyms in green spaces
- Independent retailers
- A proper swimming pool
- More open spaces
- Keep Pavilion Leisure pool
- Better choice of bars to compete with Wetherspoons
- A water fountain to cool when hot, attractive, good for kids and relaxing
- Make Churchill Gardens like Beckenham Place Park
- A less traditional Theatre set up than the current Churchill Theatre
- Ice rink in winter
- Roof top cafes
- Activities and strategy to attracting a variety of people and not peppering around vacant shops
- Prominent signposting of all three central parks
- Tennis courts
- More greenery and play areas
- Community centre with multiple uses
- Outdoor theatre in Churchill Gardens
- Increased independent shops/cafes
- Trampolines for children
- Art Galleries
- Music studios particularly for younger people

- Improved support for suitable events existing cultural facilities
- Mini golf
- Invest in the public library

Do you have any other comments in relation to retail, culture and leisure in Bromley Town Centre?

- The Glades is still pleasant and well maintained
- Stop construction of high rise buildings
- Preserve beautiful heritage buildings and maximise their use
- Arts and crafts outlets
- Lower council rates to encourage independent shops
- Bring the Tram into town centre to make it more accessible
- Encourage pop-up shops
- Reopen the library toilets
- More shops connected to the needs of the community
- Redevelop it
- Refill centre/shop
- Bromley is a commuter town
- Create more sense of community in Bromley
- More emphasis on walking and cycling into the centre of town
- There is a gap in the homeware market
- Encourage greater use of last-mile deliveries by bicycle
- Bromley Little Theatre and Churchill Theatre should be supported and protected in the SPD
- Central Library is a much under-loved and under-used resource
- Engage with Churchill Theatre to have easily accessible cultural events on the High Street
- There need to be plenty of non-retail operations, e.g. gyms, cinemas, lockers, etc
- The music in some shops is often so loud that the buskers music gets drowned out
- Please make Bromley more competitive in terms of what shops are available
- It would be great to have a grocery store like Planet Organic or Whole Foods in central Bromley because there is no current option right now
- Needs to be a lot more creative thought put into the current offering for the town centre to thrive
- Culture, social, community, and leisure uses as well as small business use must be allowed to take the place of retail
- Ensure parking charges are low to entice residents into the town centre for shopping or other activities, especially families
- Buying an incredibly expensive sculpture of an elephant riding a bicycle has not benefitted the culture of the town

6 Public Realm, Permeability and Connectivity

33 responses received

How inviting is the town centre public realm currently? What elements of the public realm do you think are good and bad?

- There could be more green infrastructure
- The pedestrianised area of the high street works well
- The market is an asset and should be extended and enlarged

- There have been some improvements around Bromley North
- The play areas for children are good
- There is a sense of community
- The use of flower beds and benched just outside Lidl for the elderly and other members of the public to sit on
- The area towards Bromley north is cute but needs to be more accessible
- It does not feel safe cycling into Bromley Town Centre
- It is poorly maintained and full of litter
- Do not over pedestrianise
- There is little amenable outside space for socialising
- There are 3 design areas in the town centre which do not complement each other (Bromley South/Bromley North/Market Square)
- The totem pole street lights look awful
- The roads surrounding the centre are extremely busy and congested with little space for cyclists or walkers
- No cycle infrastructure or shared space
- High street by Bromley South is too busy with traffic and not enough space for pedestrians
- Some shops on the high street play their music too long and it interferes with the buskers
- Remove hostile urban seating
- Extend the pedestrianised areas
- The High Street is overly brash and commercialised
- It would be better to view the design and cost of improvements to the town centre as vitally necessary to better nurture the people there
- Disabled access is particularly bad on the Bromley North line

What could be done to make the town centre a place where people will want to dwell?

- More seating
- Better lighting
- More outdoor space
- Greater police presence
- Improve Bromley South
- Place interpretation boards to identify historic buildings
- Remove car access
- Safer cycle routes
- Increase pedestrianisation and ensure that there is plenty of provision for cyclists
- Provide more play equipment within the town centre rather than private fairground rides
- Ensure all areas are accessible for disabled people
- Refurbish the Mall
- Clean up litter
- There needs to be suitable provision for loos, washing and refilling water
- More social/community areas, more pedestrianisation and safe cycle routes with secure cycle storage with CCTV
- More independent shops

How easy is it to navigate through and within the town centre?

Negative Comments

- It is only easy for cars

- The market makes it hard to navigate
- The footpaths in Bromley South are too narrow
- Spaces are disconnected
- Hard to access on foot as surrounding roads are busy with traffic
- Hard for cyclists
- Library Gardens are not clearly signposted
- Palace Park needs better access and signposting
- It is not inviting to walk past the North part of the High Street
- More signage needed in the Glades (where exits lead to etc.)
- It is difficult if you are unfamiliar with the area
- The Upper High Street is poorly integrated
- Pavements are always crowded
- Market takes up a lot of pedestrian space
- The Palace Park needs signposting and waymarking for people to find their public park

Positive Comments

- The signage is good
- More green links connecting the two parks would be good
- Bring greenery and garden architecture into dead space

Do you have any other comments in relation to public realm, permeability and connectivity in Bromley Town Centre?

- Have one theme through the town
- Live music is nice
- The positioning of the playground in Queens Gardens is so near the busy road
- Need to have better police and security presence at all hours as too many antisocial and criminal behaviours
- SPD guidance should be detailed enough to prevent a reoccurrence of the black slugs and totem-pole lamp posts
- 20mph speed restriction throughout the Borough
- Put people ahead of traffic
- Bring the Bakerloo Line to Bromley
- Introduce some Low Traffic Neighbourhoods
- Improved cycling infrastructure would be welcome to discourage car use, and more pedestrianisation
- Surrounding roads need to support active travel
- Lack of continuous cycle paths makes it hard to travel through Bromley
- Bromley South station is problematic for disabled people; taxis monopolise waiting areas and no place to pick up disabled passengers
- Safer pavements and crossings for pedestrians
- Plants on roofs of buildings
- Increase permeability

7 Historic Environment

38 responses received

How important is the historic environment to the character of the town centre?

- It is important to keep historic features whilst also adapting for the modern world
- Many of the historic buildings have already gone, beginning with the White Hart
- The historic environment is very important to ensuring a distinctive character to the town
- Please consider carefully the impact that large (particularly high-rise) developments have on the conservation areas which directly connect to the areas of proposed development
- During lockdown the sense of local space became even more important
- Bromley's unique character comes from a mix of historical buildings, green spaces, and architectural style
- It sets it aside from other shopping centres
- There is nothing in the town that celebrates Charles Darwin or HG Wells
- The historic look of Bromley, of a Kentish market town, will be important to the development and recovery of Bromley after Covid
- This could be used to make Bromley an attractive environment to live, socialise and work in
- It is vital to the distinctive nature of its town centre, so different to those adjacent
- The heritage buildings add to character of the town
- As high streets increasingly become destinations as well as retail opportunities this will become much more important

What elements of the historic environment do you consider most important?

- More permeant plates to indicate links with former times
- The listed buildings and locally listed buildings in the Conservation Area
- Statues, ponds and the ice house area have been shamefully neglected
- Open and public spaces
- Former Maplins building on the corner of Ethelbert Road and High Street
- Keeping the library and Queens Gardens intact
- The buildings and layout of the town are part of its identity
- Laura Ashley building on the corner of Ringers Road and High Street
- Architecture
- Parks
- The Conservation Area buildings
- 17th Century Colleges and Bishops Palace
- 1930's buildings and former Gaumont Cinema
- Character of streets and local history awareness
- All older buildings that have character should be retained and, where appropriate improved
- East Street character
- Bromley North old town character
- Palace Gardens

How can development be accommodated without causing harm to the historic environment?

- Keep scale appropriate
- Consult with historians before deciding to sell/renovate/demolish historic buildings
- Leave some of the special areas as they are
- Do not development historic buildings
- Convert old buildings, do not destroy them
- New development must respect historic setting
- Avoid high rise amongst buildings in the High Street

- New development adjacent to the Conservation Area should not be tall
- Careful and sympathetic planning
- SPD should be prescriptive so that the historic Kentish town look and feel is enhanced
- The value of heritage as assets to the community and its future prosperity needs to be better recognised by the council and in its planning decisions
- Development should focus on refurbishment of existing facades, even if the internal area is replaced
- SPD should give detailed guidance focused on protecting the historic environment
- Development of one particular use or design type should not be focused in one area
- Use vacant retail premises for community and cultural uses
- All historic buildings (and interiors) should be preserved and adhere to the SPD for guidance
- Buildings should not overlook or impact upon Conservation areas or open spaces in the town

Do you have any other comments in relation to the historic environment in Bromley Town Centre?

- Bromley can be modern and have history like Croydon
- Much of Bromley's history has already been lost
- Bromley is losing its character
- Toilets need to be restored for public use
- A car less centre has been a great success
- Links to the Civic Society should be encouraged
- The Bell Hotel should be developed and preserved
- There needs to be more sympathy for existing architectural features
- The history of the town should be celebrated
- Notice boards with information about historic sites would be good
- Walking tours could be advertised
- The historic and cultural environment of Bromley has been neglected for decades
- Encouraging to see the redevelopment of the old cinema into the Picturehouse
- Bromley Council should be more respectful of Bromley's historic environment
- Information on the history of the town should be readily available so people are more aware of local heritage
- Bromley's 'heritage offer' needs to become much more used in the recovery and future of Bromley Town Centre
- Development should be sensitive to historic buildings but should also improve the historic context

8 Green Infrastructure

88 responses received

Do you think provision of green infrastructure in town centre locations is important? What advantages and disadvantages does green infrastructure bring?

Advantages

- Improve air quality
- Reduced harm to those with health problems
- There are no disadvantages

- Green infrastructure attracts people and makes them stay longer
- Encourages healthy behaviours
- Trees provide shade to keep areas cool in the hot weather
- Mental health and wellbeing
- More cycling infrastructure and pedestrian networks
- It makes the area attractive
- Help offset the loss of biodiversity
- Green infrastructure is vitally important to alleviate the impact of climate change
- Bromley's green spaces make the town distinctive
- Green infrastructure should not restrict further development coming through
- All development should address how it will increase tree/plant cover to help combat pollution
- Positive contribution to sustainable high quality urban areas

Disadvantages

- It is costly

What type of green infrastructure do you think is most suitable for Bromley Town Centre?

- Provide water fountains in the town centre
- Open up and improve area near Mill Lane
- Greenery not concrete
- More trees and well-maintained formal displays
- The planters on pedestrianised areas look neglected
- Spaces that mix sitting/socialising in a green environment
- A network of green spaces
- More greenery in Bromley Town Centre
- Wildflowers in gardens
- Discourage car use
- Cycle lanes
- Less traffic
- Put a refill centre in the town centre
- Ensure all new builds have solar panels
- Recycling provision
- Renewable energy regeneration
- Solar panels on buildings
- Ensure all shops follow recycling guidelines
- A better system of communication

Do you think there are any opportunities/locations where new green infrastructure could be provided in Bromley Town Centre?

Sustainability

- Electric vehicle charging points in all car parks
- All buildings should have their own PV/green power supplies
- Green roofs could be considered at the top open floors of car parks
- Water bottle refill stations
- More walking trails from Beckenham to Bromley to avoid main streets and cars

Public Realm/Open Space

- When buildings are demolished part of the land should be given to green space
- Invest in neglected open spaces such as kids playground
- Town Centre does not have enough green infrastructure
- Sections of the paved pedestrian areas could be broken up to provide areas
- New build developers should apply for a visible green addition to the application
- Green walls, roofs, solar panels, swift and bat bricks in new builds
- Decanalise River Ravensbourne
- Area in front of Bromley South would benefit greatly from green planting
- Replant the palm tree Green gardens in schools to grow their own vegetables
- Use parks in Bromley to provide new green infrastructure
- Planting should be considered wherever practical
- More wild areas to encourage biodiversity
- The Garden in the Civic Centre could be used better s in the central reservation of Kentish Way and irrigate them
-

Other Comments

- Build a new environmental education centre to get people interested
- Be the change and lead the way
- Many local action groups will want to work collaboratively
- More trees will soften the ugly modern buildings but should be accompanied by proper maintenance schedule
- Bromley could pull together representatives from many Bromley and nature groups and discuss suggestions to take forward
- New funds should go towards maintaining Martin's Hill and Churchill Gardens
- Put a green wall on the front of Churchill Theatre where the slate tiles used to be

Which, if any, open spaces in and around the town centre do you currently use, and why?

Palace Park

- Good to play football
- Good for walking

Norman Park

- Good to run in
- Good for cycling
- Dog walking and socialising
- Clean, big and great for wildlife

Queens Gardens

- Hard to access and not well signposted
- The playground is good for children to play in
- A nice walk through to town centre
- Great to relax in

- Regularly use for exercise
- Good seating
- Good to walk in
- Screen the children's playground

Churchill Gardens

- Nice to walk in
- Accessible from Bromley High Street
- Convenient as it is close to Bromley High Street
- A big and pleasant space
- Good to watch wildlife and enjoy nature
- The only real open green space
- Great to relax in
- Quiet to sit and have coffee
- The amphitheatre could be better used and maybe even a cafe or kiosk and seating
- Good to go with children (but there is an ongoing litter problem)

General Comments

- Parks in Bromley are relaxing and quiet
- Good for running, cycling and walking the dog
- Open areas are a good connection to nature
- Martins Hill has acid grassland which is interesting for wildlife
- Library Gardens and Martin's Hill because they are havens from the busy High Street with pleasant views
- College green is lovely to spend time
- Queensmead Recreation Ground is good for recreation, leisure and socialising
- Wildflowers and less mowing would make these more attractive
- Good to connect with history of Central Bromley and more natural landscape not normally found in urban landscape

None

- Parks do not feel safe
- Parks are not clean
- Lack biodiversity
- No local parks (BR2) where it is possible to sit with friends
- There is too much litter, and the wardens don't monitor
- I prefer to drive to Petts Wood/Chislehurst/High Elms

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?

Palace Park

- Preserve public access
- Signpost the park and make it more accessible
- Provide with its own wheelchair friendly kissing gates
- Verges should be used to grow more plants and increase greenery

- Clearer signs about when this park is open to the public
- Open it up so more people are aware of its historical importance

Queens Gardens

- Better signage
- The playground is way too close to the polluted main road so can't be used
- The playground should be moved or screened with 2.5m high green ivy

Norman Park

- Wide verges adjacent to hedgerows should be managed
- River and riverside is pleasant but the grass cutting is too close to the river

Churchill Gardens

- Re-open the toilets
- Reinstate the pond and surrounding sitting steps in Churchill Gardens and use it for outside shows
- Balcony from Churchill theatre overlooking the park could be used so much better and be a great AI fresco space
- Outside arena could be a fantastic space as used to be years ago for shows/concerts and music events
- Signpost the park and make it more accessible
- Water refill points should be available in all green spaces
- Churchill Gardens could be improved with better plants and maintenance of flowers
- The litter needs to be cleaned up
- Clean the water in the ponds
- Ensure the playground sand is cleaned and maintained
- More public art and/or water feature
- More police presence
- Better access to Church Road at the end of Church House Gardens
- The Skate Park in Churchill Gardens is good but scary for younger children
- Plant more around the concrete area to encourage people to walk through/around

Other Comments

- All parks should be made more user friendly
- All surrounding green parks going down to Shortlands
- Open spaces should have refreshment facilities that do not detract from the beauty of the park
- Introduce fixed trails for children to follow linking all of the green spaces in Bromley
- Re-wild the River Ravensbourne in Queens Mead
- College Green is not used and should be developed into a pleasant space

Do you have any other comments in relation to green infrastructure in Bromley Town Centre?

- Bromley Town Centre should be innovated with vertical green walls/gardens especially in the built-up areas

- Get the community involved in the planting of green infrastructure and you create places that people take pride in and care for
- Bromley can use its green spaces to stand out from surrounding centres such as Croydon and Bluewater
- The Ravensbourne river needs the land above/around it to remain green, so the water table is not interfered with
- Areas that are protected from air pollution and are safe to travel to
- Green infrastructure is the lynchpin to making Bromley beautiful
- The black plastic seating is atrocious and brings no aesthetic qualities to the streetscape
- The playground in Queens Gardens by the main road is too close to the main road
- Development in the town centre should be considered on brownfield sites
- Don't use male birch as this exacerbates allergies
- A lot of grass verges could be replanted with wildflowers to encourage biodiversity
- Bromley ignore any voices and run useless surveys
- Engage citizens in adopting trees and greenery near them to help water etc
- There are flooding issues around the triangular flats on Engelbert Road
- Beehives on the top of offices
- Provide drinking water fountains and bottle filling facilities in all public open spaces
- All new developments should be designed to collect rainwater for flushing and watering
- Bins in public spaces should have a fixed top to stop foxes accessing them and spreading litter

9 Environment and Air Quality

78 responses received

What actions do you think could be taken in order to reduce carbon emissions?

General Comments

- More local awareness is needed
- Bromley Councillors are not taking this seriously
- There is no problem with carbon emissions and trying to control them is pointless
- Making it safer for people to walk and cycle to school, the shops and work
- Ensure there is plenty of recycling points
- Introduce air quality monitors to provide clear evidence about ambient air quality
- Incentivise the use of non-fossil fuel transport
- Enforcement to ensure the development of the circular economy and sustainable waste management
- More focus on green infrastructure
- Locker facilities so that people can shop and store until ready to go home rather than carry shopping around Bromley
- Increase green planting with ivy walls, roof gardens and more appropriate planting rather than ornamental planting
- Encourage more shopping from home via the internet so reduce footfall in Bromley Town Centre
- Limit the height of buildings
- Refer to local specialist input
- Build a refill centre
- Funding vegetable growing gardens in schools

Public Realm

- Make roads and pavements safer
- Upgrade all streetlights to LED
- Pedestrianising more areas of Bromley Town Centre including East Street at the Bromley South end of the High Street
- Installing secure cycle racks beside schools, shops, and stations
- Increase the number of trees, green walls, and native planting

Energy

- More solar panels where possible to reduce energy carbon footprint
- Ensure all council offices and any other public buildings are on Renewable Energy Tariffs for energy
- Encourage solar panels on shop and office buildings if they can be installed without detracting from the architecture
- Businesses should be encouraged to conserve heat during winter months and not overuse air conditioning during the summer months
- Making use of decarbonisation fund for older buildings
- Require photovoltaic electricity generators and solar heating panels to be placed on all new developments
- The Council should encourage and incentivise businesses and households to become carbon neutral
- All buildings must be retrofitted with insulation, and the Council should make the most of all government grants available

Transport

- Make roads and pavements safer
- Reduce local speed limits to 20mph
- Introduce more EV charging points
- Encourage public transport use and active travel
- Low traffic neighbourhoods
- Get the council's waste (Veolia) and green space (IdVerde) sub-contractors to use electric
- Public transport should not use diesel fuel and there should be grants made available to upgrade vehicles concerned
- Discouraging unnecessary motor vehicle use
- Segregated cycle lanes
- Restrict non-essential traffic
- Stop giving priority to motorists
- Free parking for electric cars

What actions do you think could be taken in order to deliver air quality improvements?

Enforcement/Monitoring

- It needs to be taken seriously by Bromley councillors
- There are very few air quality problems in Bromley, and no actions are justified on a cost/benefit basis
- Install more air pollution monitors that can be live fed back to the public

- Greater control/enforcement of clean air provisions
- Take some action about the queuing at Waldo Road tip

Green Infrastructure

- Promote green energy (nuclear energy is not really green)
- Plant more trees, hedges and ivy screens
- More emphasis on green spaces and improving wildlife habitats
- Improved green waste collection would reduce the need for bonfires
- Increase green spaces with filter air e.g., green roofs
- Identify suitable locations for green roofs and green walls
- Continue to promote green spaces and organic farming
- Allow residents near the centre to plant wildflower meadows and trees on wide verges

Information/Incentives

- Aim an information campaign at school children so they understand pollution caused by traffic
- Consider a workplace parking levy to fund town centre improvements and discourage unnecessary commuting
- Advertising campaigns and financial incentives to firms/individuals who do the right things
- Promote local producers and independent shops

Public Realm

- Pedestrianise more areas of Bromley Town Centre including East Street at the Bromley South end of the high street
- It would be better to relocate the children's playground to the back of Queens Gardens away from idling traffic and pollution

Transport

- Give priority to active travel
- Make it safer for active travel to work/school/shops
- Provide more secure cycle storage at shops, schools and station
- Install more EV charging points
- Resolve congestion at traffic light junctions
- Encourage people to turn off their engines when cars are stationary
- Remove speed ramps in residential areas and reduce the speed limit so that driving is at a steady, fuel-efficient level
- Prioritise public transport
- Individuals should be able to get grants towards owning a bicycle or ensuring a current one is fit for use
- Turn off diesel engines and introduce fines for those who do not comply
- Encourage electric vehicles with more fuelling points
- Limiting access hours for fossil fuel vehicles to school roads / high streets during set times
- Greater transport infrastructure
- Increase train/tube links with Central London
- Higher parking fees for fossil fuel vehicles (or reduced fees for electric vehicles)
- Secure and CCTV-monitored bike storage must be available across the whole Borough

- Make cycling routes safer
- Place restriction on use of cars in the town centre
- Encourage a free park and ride scheme at Christmas to encourage people to park further afield

Do you have any other comments in relation to the environment and air quality in and around Bromley Town Centre?

Enforcement/Monitoring

- Restrict fires to Bonfire night
- It would be great to see investment in air quality monitoring and education around active travel
- Bromley Council should install a network of live air quality monitors that can be accessible online
- There needs to be a long-term plan for how the area will work for the residents, businesses and visitors
- Ban smoking and vaping
- Housing recycling and refuse collection needs closer supervising

Transport

- Less traffic
- Without a plan to encourage cycling and walking it will be impossible to reduce car use and improve air quality
- The traffic and therefore air quality on Beckenham Lane is appalling
- People should be encouraged to use public transport
- Bromley needs to be made more attractive to walk and cycle (wider pavements etc)
- Implement Park and ride schemes
- Reduce speed in built up areas
- There should be traffic calming measures for College Road
- There are too many flats which makes infrastructure for sustainable transport (EV charging points) difficult to implement

Green Infrastructure

- Care for the environment
- Continue to plant trees and replace those that fall
- Increasing the trees along roadsides will deliver shade
- Effort would be better invested in the towns green space and heritage

General Comments

- The air quality in Bromley is poor
- Bromley Town Centre is not very green
- Planning approval is low for zero emissions replacement buildings
- The initial draft of the Air Quality Action Plan 2020 does not have clear and measurable targets
- Bromley needs to stand out from other boroughs as the cleanest and greenest
- Air quality has improved during lockdown due to lack of congestion
- It is very poor especially in the roads immediately adjacent to the town centre

- Free water refill and drinking fountains will reduce plastic waste
- Planning permission shouldn't be required for secure cycle storage in front gardens
- Tighter regulations on new businesses/buildings being more energy efficient
- Littering is an increasing problem

10 Development Opportunities

55 responses received

What is special/unique about Bromley Town Centre?

Transport

- Great transport links
- The pedestrianised areas
- The traffic free centre goes some way to making Bromley a nice place to be in

Open Spaces

- Great green spaces
- Parks and green spaces should be preserved
- The view of Keston Ridge

General Comments

- Family friendly
- The physical condition of the town centre is decent
- Bromley is spacious

Development

- Independent businesses
- Low level development
- There are lots of opportunities to develop homes
- A variety of shops and activities
- The Churchill Theatre and Central Library are very important
- Bromley is spacious
- The older buildings give it distinctive character
- Bromley North has been well preserved
- The market should be developed and supported
- The area is a desirable place to shop
- The SPD should reinforce development to the south of the town centre as a visual gateway and optimise the use of land and opportunity
- The Railway Pub building and Bromley North Station facade
- Encouraging sustainable local businesses considerate of the natural environment and locally produced products
- the unique selling point of our high street (north and south) is that it's a historic Kentish market town, with great heritage buildings
- There is a young and diverse community feel
- There are a breadth of products and services on offer

What aspects of the town centre do you think are integral to the character of the area?

Specific Areas

- East Street
- Market Square
- Bromley South Station
- The Medhurst Building is lovely - underused ruined by Primark
- Churchill Theatre
- The Market
- The Library
- Bromley North has been redeveloped and is much improved with a village feel to it

Other

- Do not replace any buildings
- There is no character to the area
- The sense of arrival to Bromley Town is very poor
- The A21 loops rounds the town centre effectively cutting off the town from the area to the east
- It's on a hill which should have good views over the surrounding area
- Pedestrianised areas
- Restaurant and bars areas
- The busy atmosphere of the High Street that supports a variety of land-uses
- Proximity of theatre/library and park to the high street shops
- Low rise development
- Heritage buildings and open spaces
- Trees
- The parks
- The historic buildings
- Conservation Area
- Homes for wildlife and trees and shrubs helping keep the air clean and cool
- The mix of unique buildings, the Market Square area, the view looking down the High Street towards Bromley South
- The pedestrianised high street and green space around the Churchill Theatre is integral to the character of the area

Are there particular areas within the town centre that have a specific character that particularly warrants further guidance?

Specific Areas

- The conservation area
- North Street
- Bromley North Village
- Bromley South Station
- The Old Bell Inn should be redeveloped
- The Old Town Hall
- Churchill Gardens

- Parts of opportunity Site G/10 are not within the Conservation area but need to be considered for protection
- The Local Plan development proposals of the Y buildings at the Civic Centre site assumed to be permitted development are now found to need planning permission
- The Civic Centre Area is a short walk from the Town Centre but is made quite isolated by the busy A21
- Market Square has so much character and should be left alone
- Protect Picturehouse Cinema from development

Other Comments

- More greenery on the high street to soften the impact
- The green spaces adjacent/close to the High Street - which need protecting
- The mid-late Victorian housing around Bromley Town Centre should be protected
- Keep the old market town character
- East Street and the north end of High Street from the Royal Bell upwards are the most characterful places in Bromley town centre and should be the targets for conservation
- Any development here should be respectful in character to not stand out
- Concentrate on supplying family accommodation instead of flats with no outdoor space

Do you have any other comments in relation to development opportunities in Bromley Town Centre?

Positive Comments

- The Hill Car Park is a good development opportunity
- More encouragement required to redevelop shabby areas between Elmfield Road and Bromley South
- Derelict offices by Bromley Police Station could be turned into a world class suburban cultural destination
- The Glades restaurant terrace has fallen flat - reduce rents to fill the units
- Bromley Town Centre is the perfect spot for high density modern housing
- There should be more development opportunities in Bromley Town Centre because it is a metropolitan area
- Bromley should be looking to present itself as the affluent and diverse borough it is by putting more effort into the town centre
- Bromley Little Theatre should be helped with their rebuilding

Negative Comments

- No more high-rise development
- There is too much emphasis on new build development
- The development at Bromley South is not attractive
- Do not lose green space
- The masterplan as it stands shows very little imagination
- Do not make Bromley the new Croydon
- The Masterplan shows very little imagination
- Bromley Town Centre does not need any more shops or offices

Other Comments

- Encourage public transport use
- More cycling infrastructure
- Public transport is not an adequate replacement for private car use
- There needs to be a long-term vision for building flats that are nice to live in for long periods of time
- New development should respect the existing scale and character
- Development opportunities should be at the appropriate scale
- The existing scale and historic nature should be preserved
- Keep all new developments low rise
- Use innovative green planting
- Encourage remote working hubs for local workers where working from home is impossible or difficult
- Unused office space could be converted to become affordable housing (with caveats)
- New housing must be part of a community plan
- Expand the market to include farmers markets
- New development should be low key and respect the historic character of the town
- Allow the community to borrow and utilise empty shops at community prices
- Use church halls for food sales, car boot sales any other ideas the community suggests
- All new developments should have solar panels and heat pumps (not gas boilers)
- Limit the height of new development to five storeys
- There are already too many empty offices. Affordable housing is much more important
- All development should be carbon neutral

Report No.
CSD23129

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: EXECUTIVE

Date: Wednesday 18 October 2023

Decision Type: Non-Urgent Executive Non-Key

Title: OUR BROMLEY MAGAZINE

Contact Officer: Susie Clark, Public Affairs Executive
Tel: 020 8461 7911 E-mail: susie.clark@bromley.gov.uk
Andrew Rogers, Head of Public Affairs
Tel: 020 8461 7670 E-mail: andrew.rogers@bromley.gov.uk

Chief Officer: Director of Human Resources, Customer Services & Public Affairs

Ward: Borough-wide

1. Reason for decision/report and options

1. This report sets out the background behind the launch of the Council's resident magazine – 'Our Bromley'. It outlines the rationale behind the magazine and why it was necessary to launch such a publication, to ensure that all residents, including the most vulnerable, are better able to access the Council's services. It also outlines proposals for a permanent magazine going forward.
2. The demise of printed local media in Bromley in favour of digital media has left a challenging landscape in which to deliver information to everyone in the Borough including those not digitally enabled.

2. **RECOMMENDATION(S)**

- 2.1 Agree that the Council produces a regular paper magazine called 'Our Bromley' three times a year to be distributed to all residents. There is flexibility to move to four editions a year, but for the moment, three is recommended as a more viable option.
- 2.2 Note that the financial implications are envisaged to be cost neutral, with the total expected spend of £180K over three issues, at current prices, being anticipated to be covered by advertising revenue.

- 2.3 Note that after a period of a year, there will be a review on the impact of the publication before continuing in future years.
- 2.4 Note the change of name of the Council's e-mailed newsletter for residents from 'Update' to 'Our Bromley'.

Impact on Vulnerable Adults and Children

1. Summary of Impact: N/A
-

Transformation Policy

1. Policy Status: Not Applicable
 2. Making Bromley Even Better Priority (*delete as appropriate*):
 - (1) For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
 - (2) For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
 - (3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
 - (4) For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
 - (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: The costs for the pilot edition were £58,710 made up of printing and distribution costs, with 14 pages of advertising attracting advertising revenue of £56,850
 2. Ongoing costs: At current prices, each edition of the magazine will cost £60k, anticipated to be covered by advertising revenue. It is anticipated that the magazine will be published three times per year. It should also be noted that any Council advertising will be drawn from existing budgets.
 3. Budget head/performance centre: HR, Customer Services and Public Affairs
 4. Total current budget for this head: £
 5. Source of funding: Advertising
-

Personnel

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

Legal

1. Legal Requirement: As with all Council communications, there is a requirement for the Magazine will be produced in line with the Code of Recommended Practice on Local Authority Publicity.
 2. Call-in: Not Applicable
-

Procurement

1. Summary of Procurement Implications: None
-

Property

1. Summary of Property Implications: None
-

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*): Bromley residents.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not applicable.
2. Summary of Ward Councillors comments:

3. COMMENTARY

- 3.1 Local authorities have a duty to communicate with residents about what they are doing, so they can access services, and also show how they are spending residents' Council Tax payments.
- 3.2 In recent years, in particular, there has been a steady decline in the printed local media which has meant that it is difficult to reach everyone in the Borough, especially those who are not digitally enabled. In the past, local publications printed and delivered door-to-door would have featured Council press releases and stories as well as carried paid-for advertising booked by Council services with a need to reach people in the borough with their service offer. The need for printed communication was brought into sharp focus during the Covid-19 pandemic, when it was necessary to produce printed material that was distributed door-to-door in order to ensure that people in the Borough received important information about the pandemic locally from the Council.
- 3.3 Prior to the start of the pandemic, there were three local newspapers, which were highly established within the Borough. Whilst they were operating within a challenging and changing commercial environment, they were nevertheless continuing to publish printed newspapers on a weekly basis. Now, only one of these newspapers is being published, with its limited printed distribution focussed on 'pick up' locations rather than directly through residents' doors.
- 3.4 Bromley Council has a number of successful communications channels which reach the majority of residents, including the website and other digital communications methods, such as social media. Channels also include the successful e-newsletter which is emailed to more than 70,000 residents who have signed up. These channels are not yet able to replace a method where all residents receive information directly in a printed, pro-active way and used alone could lead to digital exclusion for some residents. Outdoor advertising can potentially help bridge this gap, but this format does not enable more complex messages to be shared and, therefore, the potential is limited.
- 3.5 Many other local authorities in London already produce their own newspaper, newsletter or magazine, in a variety of formats, including some with the support of advertising. There are many different approaches to this, with a variety of designs and frequency of publications, but all distributing their printed product direct to residents. Bromley has not needed to consider this option in the past, especially given the historic strength of the local media, but now this has changed, it is time to consider future options to communicate widely with residents.
- 3.6 A 32-page pilot magazine was produced and distributed to all households across the Borough in the summer of 2023. The magazine included both editorial content, about the Council's services, and paid-for advertising, with the support of individual council services that need to generate wide understanding of their services, such as fostering and recruitment. External commercial advertising was also secured, including with other public sector partners. 'Our Bromley' magazine was also written and designed to signpost to other online content for further reading should residents want more information on a topic.
- 3.7 The name of the magazine, 'Our Bromley', was chosen as a title that encapsulates the ethos of shared responsibility and pride in the Borough, with the publication designed to have a 'quality' look to both attract sustained advertising interests and to encourage extended readership.
- 3.8 It is recommended that the name 'Our Bromley' is also adopted for the Council's e-newsletter, currently Update, with the emailed newsletter complementing the magazine and providing an opportunity for further communication with residents. More than 70,000 residents are signed up to the Council's e-newsletter with this being either through an approach to customer services or directly through the Council's website.

3.9 Even in the conceptual pilot edition, the proposition attracted enough advertising to broadly cover the costs and it is envisaged that future editions will also cover costs. It should be noted, however, that the pool of potential local external advertisers who can afford to buy into this proposition is limited. It is not envisaged that companies that are part of wider national chains will want to take space due to their more centrally generated advertising strategies, hence the revenue must come from locally based companies and organisations. It is recognised that this local advertising market will inevitably continue to evolve over time and this revenue stream will be uncertain. There will, however, also continue to be a need for public sector organisations to communicate widely, using door-to-door printed communications, such as 'Our Bromley' magazine or a similar vehicle and this needs to be considered alongside the local advertising market.

Options

3.10 There is potential to publish the magazine four times a year which many councils do, but by limiting the initial publications to three times a year, costs are controlled with all residents receiving regular communications from the Council, with an option to extend further if needed at a later date.

Preferred Option

3.11 Following the pilot magazine, it is recommended that going forward, Our Bromley magazine will be produced three times a year.

- The suggested schedule would be:
- Spring – delivered in the run up to Easter
- Summer/Autumn – delivered prior to August Bank Holiday
- Winter – delivered pre-Christmas

3.12 Consideration is also being given to an electronic version of the Magazine to enable it to be shared electronically as required.

Looking to the Future

3.13 Going forward, we will continue to evaluate the Magazine and seek further feedback as well as consider how the publication interacts with other communications mechanisms for residents.

3.14 It is envisaged that Our Bromley Magazine and Environment Matters will be integrated over the coming year.

3.15 Currently, the Council's waste contractor Veolia is contracted to deliver the Environment Matters newsletter twice a year including a waste calendar. Mutual agreement between the Council and Veolia will bring the publications together with the potential for savings to be made.

4. FINANCIAL IMPLICATIONS

4.1 The costs for the pilot edition were £58,710 made up of printing and distribution costs, with 14 pages of advertising attracting advertising revenue of £56,850

4.2 At current prices, three editions of the magazine will cost £180k, anticipated to be covered by advertising revenue. It should also be noted that any council advertising will be drawn from existing budgets.

5. PERSONNEL IMPLICATIONS

None – business as usual.

6. LEGAL IMPLICATIONS

As with all Council communications, the Magazine will be produced in line with the Code of Recommended Practice on Local Authority Publicity.

7. WARD COUNCILLOR VIEWS

- 7.1 Feedback has been received about the initial pilot edition of Our Bromley magazine, including positive comments and questions about the costs of producing the magazine. Whilst this is welcomed, it is recognised this feedback is limited and it is still too early to evaluate the impact on individual services, to gauge the success of the communication.

Non-Applicable Headings:	
Background Documents: (Access via Contact Officer)	[List any documents used in preparation of this report - Title of document and date]

This page is left intentionally blank

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is left intentionally blank