

APPENDIX 1

Core Strategy Issues Document - Summary of Responses Received - November 2011

Total no. of comments: 625

This document outlines the comments and suggestions received in response to the Core Strategy Issues Consultation Document July- Sept 2011.

The responses are made to the main three sections of the document:-

- **Vision and objectives - 46 comments**
- **Pen Portraits- 221 comments**
- **Strategic / Spatial Themes- 358 comments**

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Vision and Objectives

No. comments = 46

Vision

Whilst some commented that the objectives are clear and focussed others felt that the objectives do not focus on the key issues residents are concerned about, are contradictory and should be SMART (Specific, Measurable, Achievable, Realistic and Timed), reflecting areas of priority, including a realistic timeframe in relation to resources available. It was suggested that the Vision statement should show more clearly how it is hoped Bromley will develop over the course of the Core Strategy period. The Vision eg, 'There are 45 conservation areas and a wide range of historic and listed buildings' reflects today (Environment Agency) rather than considering future changes in the role of town centres in the future, traffic and infrastructure changes and population growth. The Core Strategy should identify what has stopped us achieving the Vision today.

The loose boundary pen portraits are supported and it is suggested that the vision should be expanded to set out how the area and the places within it should develop, building on the pen portraits which set the scene. It was suggested that the Vision should relate closely to the Council's Community Strategy and develop the CS themes further, particularly regarding the quality of the environment and new housing.

The contribution of future development to achieving the Vision that "people enjoy a good quality of life in all Bromley's places" was highlighted.

Some comments noted that it is important to appreciate and acknowledge Bromley's position as London's greenest borough and the extent of Green Belt. However, others considered the Vision environmentally biased, noting that whilst environmental considerations are obviously important, most residents put education, health, prosperity, opportunity, mobility and transport above the environment.

It was noted that there are major disparities between the income and health factors across the Borough and that these disparities should be reflected somewhere within the overall Vision statement.

It should be acknowledged that The London Plan 2011, the National Planning Policy Framework and future guidance documents together with reference to working with adjacent boroughs all affect the outcomes of this document. Attention is drawn, to London Plan references to borough responsibilities, in respect of social infrastructure and suggest that London Plan terminology is used.

Objectives

1. Open and Natural Space

Suggested responses included:-

- Whilst there is a need to protect open spaces, natural environments and trees, there is also increasing pressure on the Green Belt to provide for the growing needs of the community. Appropriate development, which preserves the openness and appearance of the Green Belt should therefore be allowed.

- Small release of Green Belt for housing would be preferable to compromising the character and quality of life of residential areas that are already “full”.
- Changes should be made to the Green Belt boundary for land not serving the 5 purposes of Green Belt set out in PPG2. This would also be in line with the draft NPPF which includes references to
 - the presumption in favour of sustainable development, and the need to support economic growth through the planning system.
 - extending the allowance for previously developed land within Green Belt to come forward for development, which is allocated for redevelopment to similar sites not already allocated or designated for development in a local plan.

Also, when reviewing Green Belt boundaries through Local Plans

- have regard to the long term so that the boundaries endure beyond the plan.
- take account of the need to promote sustainable patterns of development.

Suggested additional Objective:

- *“To review the Green Belt Boundary to ensure that any sites, which do not meet the 5 criteria set out in PPG 2, are removed from the designation”.*
- Improving access to the Green Belt by the neighbouring urban populations should be a priority.
- This objective is broadly supported by Natural England with this suggested rewording “Encourage protection, enhancement and *creation* of biodiversity”
- This objective is supported by the Environment Agency who suggest
 - reference to delivering the Water Framework Directive though this objective
 - link with the blue ribbon policy in the London Plan.
 - incorporating actions from the local biodiversity action plan.
 - combining elements with Objective 7 (Climate Change and Environmental Issues)
 - revise objectives to refer to protection of *land, soil, surface and ground waters and air*, and the protection and enhancement of *fish stocks*. *Managing for the benefit of wildlife and people.*
 - Add new objectives:
 - *Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change.*
 - *Improve the quality of surface and ground water, rivers and wetlands for the benefit of people, the economy and wildlife.*
 - *All sections of society to have opportunities to enjoy water and wetlands through sport and other recreations.*

2. Health and Wellbeing

- Objective to provide a healthier environment welcomed as is the support for all communities to improve their own environments. The Healthy Urban Development Unit suggests that the objective concerned with tackling deprivation should reference “health inequalities”.
- The role of biodiversity and the natural environment in respect of health, recreation, climate change adaptation and quality of life should be made more explicit in the Core Strategy and policies included to ensure the Borough’s green infrastructure is designed to deliver these multiple functions. (Natural England)
- The Environment Agency support the objectives and suggest an additional objective:
 - *Healthier local environments should be encouraged and managed to enhance people’s lives and support a sustainable economy.*

- A specific objective regarding planning for the ageing population in respect of housing and other support mechanisms, in particular a pro-active stance towards Owner Occupied Retirement Housing.

3. Housing

- Support for the objectives which facilitate an increased supply of new homes.
- Comment that the continuation of existing policies would not be a sound approach since they would not deliver the necessary quantum of growth.
- Raise the quality of existing flats particularly poorly maintained conversions which adversely affect the character.
- Too many old properties are readily demolished in favour of new build flats and executive homes, with little regard for infrastructure - local schools, surgeries.
- It is suggested that the objective be titled “Homes” rather than “Housing”
- The objective should provide an appropriate supply of housing suitable to a range of differing incomes.
- Bromley should sign up to the London Accessible Housing Register (LAHR)
- In many places there are few, if any opportunities for future housing development, however the pen portraits could at least highlight any that are likely to come up, even where development would be contrary to other objectives.
- The Environment Agency support objectives and suggest revisions to include:
 - *New and existing developments should have a reduced environmental impact and well-planned environmental infrastructure*
 - *The issues of contaminated land must be addressed safely before development begins*
 - *Measures to mitigate and adapt to climate change and flood risk shall be incorporated into new developments.*

4. Community Facilities

- Support for the objectives which support new community facilities that are accessibly located and it is essential that the Core Strategy seeks to protect the net loss of such facilities (Metropolitan Police Authority / Service, Bromley College of Further and Higher Education and others).
- South London Healthcare NHS Trust support the retention of facilities whilst noting that change may be required to modernise the provision of services, involving intensification, relocation or reprovision of traditional community facilities in more suitable locations.
- Supporting text should highlight “places of worship”

5. Business and Employment

- Support for the encouragement of business and employment through investment and development in the local economy.
- The objective to ensure that there is an adequate supply of commercial land in the Borough by ensuring that appropriate sites are available for redevelopment is supported, with particular reference to land adjacent to Crayfields Business Park.
- An increase in local employment opportunities is supported and identified business areas should be encouraged to adapt to the changing needs of modern industry and commerce.
- Acorus (for Scotia Gas Networks) comment that there should be reference to the “qualitative value” of business and employment land & buildings. Only the best employment land should be retained and protected with a review of sites no longer “fit for purpose”. Changes reflecting the flux in the current and potential uses are suggested to the 3rd & 4th bulleted objectives to ensure an

- Appropriate range of *suitable, available and developable land and premises...*
- Adequate supply of *high quality available, developable and suitable commercial land...*
- The most efficient and effective use should be made of land, prioritising previously developed land, noting that job creation can come from a range of Economic Development uses including retail.
- Capital Shopping Centres support the enhancement of Bromley's position as a Metropolitan Town and they, and others welcome the encouragement of a prosperous evening economy, which it is suggested, should build on existing strength.
- Suggestion that banks be allowed in prime town centre locations to meet the objective of encouraging investment and developing the local economy (UDP Shopping frontage policies and parts of the Bromley TCAAP out of date).
- The Environment Agency support objectives and suggest revisions to include:
 - *Businesses and other organisations know what the best environmental options are for using resources wisely.*
 - *Businesses and other organisations reduce the impacts of their activities on water, land and air and are responsible operators.*

6. Town Centres

- The approach of ensuring the continued vitality of Bromley Town Centre, particularly through the implementation of the AAP is supported by an Opportunity Site landowner who suggests that it should be made clear in the Core Strategy that the council will work pro-actively with landowners to enable delivery.
- Retail should be diverse and include a mix of local and chain offerings i.e. not just fashion and clothing shops from the usual brands.
- Include commitment to build and retain markets like the Thursday market in Bromley Town or the Friday and Saturday offerings in the High Street
- The Council needs to look closer at areas for regeneration, e.g. shop closures in Petts Wood
- Town Centres should be safe and welcoming all day or night. The behaviour of youths during the evenings and weekend will deter people from visiting the town centre.
- All existing retail sites should seek to fulfil their potential, including through expansion or redevelopment.
- Sustainable design and construction can add value to the local economy.
- Enable banks in prime town centre locations to "ensure continued vitality of Bromley Town Centre" (require BTCAAP changes).

7. Environmental Issues

- Reference to Green Infrastructure in this section is welcomed but should be incorporated into the objectives since they can significantly contribute to climate change adaptation.
- The Environment Agency support objectives and suggest revisions to the text to include wildlife and biodiversity and suggests the inclusion of water efficiency of new developments in the criteria for energy and resource saving in the final document They also suggest combining elements with Objective section1 (Open and Natural Space) and additional objectives to include:
 - *Manage land sustainably; protecting soils, water and biodiversity and contributing positively to reducing and adapting to climate change.*
 - *Flood risk from all sources is effectively managed and people and property are better prepared and protected.*

- *Land is used sustainably to meet the needs of the public, business and the environment.*
- *Ensuring the right waste and resource management infrastructure is in place.*
- *Air quality is protected and improved.*
- *Businesses and other organisations and the public know what the best environmental options are for managing waste and using resources wisely.*
- *Safe, secure water supplies are used efficiently to meet the needs of the public, business and the environment.*
- *People and wildlife are helped to adapt to climate change and reduce its adverse impacts.*
- Surrey County Council welcome the objective to increase self-sufficiency in dealing with waste, and stress that this should relate to all three major waste streams - municipal waste (MSW), commercial and industrial (C&I) waste and construction and demolition (C&D) waste.

8. Design and the Public Realm

- Support for the objectives to improve the provision of open space in new development, ensuring accessible and safe streets.
- Natural England welcomes the reference to appropriate private and public open space, and encourages the council to include the provision of “soft” landscaping.
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- The Environment Agency support objectives and suggest inclusion of the following objectives:
 - *Ensure a presumption against harm arising from any development*
 - *Ensure that there will be no net loss, and there should be clear benefits, arising from any development.*
 - *Ensure the improvement of rivers and their corridors*
 - *Ensure that land is managed sustainably to protect and improve water, land and air and contributing positively to reducing and adapting to climate change*
 - *New and existing development should have a reduced environmental impact and well planned environmental infrastructure*
 - *Development must achieve the highest design standards and which, at a minimum, is good enough to approve and will be a distinctive and valued addition to the area.*
 - *Use construction and design techniques that encourage sustainable forms of development and favour the retention of existing buildings with their historic associations and the energy already expended and embodied in their construction.*
 - *Ensure that the location is the most sustainable for development, taking the Water Framework Directive and environmental enhancement into account.*
 - *Flood risk is managed effectively and people and property are better protected*
 - *Ensure the consideration of flood risk in design and construction of development demonstrated through a flood risk assessment where required.*

9. Built Heritage

- Bromley does not do enough to promote its heritage and 'spread the word'.
- Text should refer to heritage assets on the at risk register, rather than “historic features” and an additional objective added

- *To address historic character and the wider historic environment through appropriate new development*

10. Transport

- Safe accessible uncluttered streets objective is welcomed. The problem for people with disabilities relating to shared space and street furniture was highlighted.
- The objective to encourage the use of public transport must be supported by improvements to the transport infrastructure.
- If cars are being discouraged and the rail system is at capacity, unless a viable alternative is found building more homes in Bromley should not be allowed.
- Should include improved rail/tram/DLR links, specifically rapid transport connections North and to the West i.e.
 - Bromley North direct trains to Charing Cross and Cannon street.
 - Extension of tram from Beckenham into Bromley Town and beyond, and / or Extend DLR from Lewisham into Bromley.
- Should include development of cycle lanes.
- Sustainable transport should be encouraged throughout the Borough, through redevelopment opportunities which enhance public transport facilities, improve access and facilitate linked trips through to mixed-use developments.
- The Environment Agency support objectives and suggest inclusion of the following objectives:
 - *Major development and or facilities should only be planned where they can maximise the use of existing public transport or secure new public transport facilities to and from major housing, employment, health, education and shopping.*
 - *Ensure improved accessibility to the public transport network by promoting bus and highway development and enhancing the frequency of public transport, wherever appropriate.*
 - *Support improvement to the quality of the network by the enhancement of facilities, infrastructure and user information.*
 - *Seek developer and other contributions to the provision of and improvement to the public transport system.*

Suggested Additional Groups of Objectives

' Lifetime Neighbourhoods'

The GLA suggest an additional objective regarding meeting ' Lifetime Neighbourhoods' principles as this may provide an overarching objective for many of the neighbourhoods' issues set out in each of the area profiles with the Core Strategy setting out how the different neighbourhoods will contribute to achieving the principles of Lifetime Neighbourhoods.

"Working with local people, businesses and partner organisations".

The Environment Agency comment that it is critical to the delivery of the strategy that actions and partners involved in delivering the Core Strategy can and should be identified, including local people, neighbouring councils, GLA, DCLG, authorities with environmental responsibility (the Environment Agency, Natural England and English Heritage) infrastructure and service providers, professional and trade associations and major interest groups. They suggest an additional group of objectives headed "Working with local people, businesses and partner organisations". With the following objectives:

- *Ensure all sections of society have opportunities to influence and know how to engage with Council in order to create better places and communities.*
- *Ensure that staff have the necessary skills to work with all sections of society to develop shared solutions to identified problems and to deliver the Core Strategy.*

“Accessible Bromley for all Disabled People”.

Disability Voice would like a clear commitment within the strategy for an accessible Bromley for all disabled people, constituting a strategic/ spatial theme in its own right, including written commitments to:

- *engage a Council Access Officer to champion the access needs of Deaf, disabled and older people*
- *a strategic approach to ensure continuity of access between future developments, so deaf, disabled and older people will be able to travel door to door safely and make full use of available facilities*
- *not only meet mandatory access requirements, but all developments to be constructed to BS800 (and future incarnations) and beyond as standard practice.*
- *require all developers to have to employ an Access Consultant*

Brief Summary of Pen Portrait comments

Total number of comments 221

A range of Neighbourhood issues (NI's) were put forward in the Core Strategy Issues Document. The consultation responses highlighted following issues :

Beckenham, Copers Cope & Kangley Bridge

No of comments = 7

The most important issue for this area was NI 3.2 'How can car parking pressure around stations and more densely populated areas be addressed?' was an important local issue and it was noted that suggestions included permit schemes, free park and ride schemes, and GLA suggested introducing Controlled Parking Zones (CPZ) in areas of on street parking stress. The issue of residential development encroaching into business areas NI 3.1 was raised as important and it was agreed that higher density housing in previous commercial/industrial areas than redevelopment of residential streets with two storey buildings, and that where development takes place on sports grounds that conditions be placed that part of the site be given as a public part.

An additional issue we had not identified were environmental improvements of de-culverting the Chaffinch and undertaking associated biodiversity improvements.

Bickley

No of comments = 4

In response to NI 3.5 on 'opportunities to enhance open space for local community' suggestions included; de-culvert the river Ravensbourne in Whitehall Recreation ground. New provision including a pavilion and cafe for bowling club in Whitehall Recreation ground and youth provision in Whitehall Recreation ground.

It was felt that 'isolation amongst the elderly' (NI 3.6) should be addressed by services needing to take a proactive rather than reactive role.

There were 2 additional issues not identified in the Issues Document firstly that despite improvements in Whitehall Recreation Ground there were still concerns about the Ground.

And secondly that Homesdale Rd –Liddon Rd is defined as a business area; but there is significant doubt as to whether the designation of this land as a 'business area' remains pertinent to the current circumstances of the site and importantly Scotia Gas Networks are keen to work with Bromley Council to realise the redevelopment of their land.

Biggin Hill

No of comments = 15

The neighbourhood issues that raised most interest was 3.9 (with 6 responses) asking what 'opportunities arise to maximise employment potential in the light of its Strategic Outer London Development Centre (SOLDC) designation in the London Plan'. Responses ranged from the creation of an extensive business centre at West Camp, extension of the tramlink, and a development centre for avionics. Two companies established at Biggin Hill with over 50 employees between them (many of them local residents) support the LoCATE@BigginHill initiatives to raise the profile of the aviation cluster but felt the Core strategy document should clearly define the Council's commitment to plan for economic growth and investment in Biggin Hill and when it will have a positive local policy framework in place to unlock potential. Both are critical if the SOLDC's objectives are to be secured. Tatsfield Parish Council have concerns that in effort to maximise the employment potential of the area or to develop tourism, that we ensure that any developments proposed for the Biggin Hill part of the borough have due regard for the potential effect on the level of traffic using the narrow roads of Tatsfield. The GLA suggested that the Borough may wish to identify an appropriate spatial planning and investment tools to realise the potential of Biggin Hill.

There were 4 additional comments on issues not raised in the Core Strategy Issues Document (CSID), one requesting a Skate facility and outdoor gym at Biggin Hill Recreation ground and new allotment site required. Another pressing for an area action approach to incorporate the wider area around Biggin Hill to include housing, retail, leisure, social facilities, open space, transport 'it is important that the area is considered as a whole and not focused solely on the employment element'. A request that if housing is needed West Camp is long overdue for development- providing houses without a major impact on the green belt.

And finally from Batchellor Monkhouse – 'The Core Strategy Issues Document does not cover the need for more housing within Biggin Hill, although it does refer to a lack of social housing development. Residential development of suitable land within Biggin Hill area can create opportunities for new social housing as well as improved community facilities and an improved transport network. A review of the Green Belt boundary should form part of this work. This should include land that is well related to the settlement boundary of Biggin Hill and the A233 (London Distributor Rd). Our clients land off Belvedere Rd (4.5 hectare parcel of land to the south-east) would fall to be considered in completing that work'.

Bromley Common

No of comments = 10

The main issue commented upon was that of NI 3.16 in regard to access to nature and open space and how it can be enhanced responses suggested better lighting in Whitehall recreation ground, additional street trees to enhance green infrastructure, hedgerow planting and boundary improvements to Norman Park. The Environment Agency stated that the River Ravensbourne runs through Bromley Common and is classified as poor status under the Water Framework Directive. This area has the potential for improvement to help it reach good ecological potential. The Environment Agency would be happy to discuss the appropriate measures to improve the river, surrounding environment for people and wildlife.

On NI 3.17 'how can pockets of deprivation be addressed?' English Heritage stated that 'seek to ensure that any unidentified heritage assets and wider historic environment is considered for its potential to be a catalyst for regeneration and a stimulus for high quality design'. And Bromley College stated 'the London Plan places an emphasis on planning for high quality social infrastructure to assist regeneration. Bromley College can play its part by improving the quality and relevance of Further Education offer particularly if there are supporting planning policies should educational facilities be required'.

There were 2 additional responders on areas not identified in the CSID; comments included the need for enhanced play provision required in Norman Park; potential woodland burial site, protect woodland at Parkfields and manage under Higher Level Stewardship funding.

And finally for Bromley College a key issue is the designation of the site as part of Metropolitan Green Belt. This designation imposes significant restrictions on proposals for future development/floorspace at the Campus. The council should review the appropriateness of existing green belt boundaries. Alterations to the green belt could be made that support policy objectives of the CSID, including improving the social infrastructure, tackling deprivation and wider regeneration objectives.

Bromley Town

No of comments = 10

The main issue was 3.21 on the 'implications of growth in the town centre for the suburban character of nearby residential roads'. There were 2 responses one referring to Site A in the Bromley Town Centre Area Action Plan, stating that as site A will impact on the local community that therefore the character of residential built environment needs to have influence on design and density of any new development. And Capital Shopping is keen to highlight that the 'area for growth within town centres' is already established within the BTCAAP. As such, the implication for the character of suburban areas should be managed through the development management process and not duplicated within the Core Strategy. CSC suggests that this is explicitly clarified within the Core Strategy. CSC considers that it is essential to ensure that there is continual evolution and growth within BTC.

Additional comments- 6 responses covering various unidentified issues:-

1. Consideration needs to be given to the need for secondary school places in the north of the borough, ..the pressure on primary places continues to increase.
2. The area around Bromley Empire Cinema is shabby and run down. The cinema in particular needs a major overhaul.
3. Potential enhancement of the A21 through additional sponsorship opportunities (ie for green infrastructure);improve character of area by policy of tree lined streets & improved signage ; additional tree coverage at College Green; new play provision at Queens gardens; new youth provision (skate area) at Church House Gardens ; De-culvert the river Ravensbourne at Queensmead; undertake repairs and improvements at Mill Pond, Church House Gardens; Creation of a green walking/cycling route from Keston to Bromley Town Centre and beyond towards Lewisham.
4. Council has out of date policies for primary shopping frontages and lack of evidence to continue with them. BTCAAP does nothing to address this matter- the intention is to use UDP policies S1, S2 and S3 as part of LDF- despite lack of evidence. These policies are out of step with Government policy and should be reviewed. The focus should be on the quality of the occupier, not on maintaining an arbitrary level of use class. Keeping significant generators of footfall out of primary frontages will actively work against the achievement of the Council's strategic objectives and is inconsistent with national policy.
5. Parking issues in the town centre- CSC has ongoing concerns about insufficient parking across the town centre. This problem is likely to be further exasperated with the further planned loss of parking within the town centre. CSC considers that alternative parking solutions, as well as sustainable transport initiatives should be considered e.g. provision outside of BTC through park and ride schemes. CSC welcomes the opportunity to look at parking more holistically across the Borough through the Core Strategy. CSC also note that congestion is a problem within BTC - CSC consider that a holistic transport strategy addressing transport modes and parking should be incorporated within the Core Strategy.
6. GLA- As BTC is a major transport hub, TfL would suggest a key challenge should be 'how growth can be accommodated and sustained', such as through the provision of new infrastructure, etc.

Chelsfield, Green Street Green & Pratts Bottom

No of comments = 3

NI 3.24 on 'how can the benefits of excellent transport links to London and the M25 be maximised' the response from GLA was that 'there is very limited opportunity to improve rail services at Chelsfield because of the constrained two-track railway between Orpington and Sevenoaks. However, there may be opportunities to improve links to the rail station to make it more attractive to passengers'.

Neighbour hood issue 3.25 asked about potential to enhance recreational areas and

Additional comment - Chelsfield Park Residents Association- requested they be included as an Area of Special Residential Character (ASRC) designation. A previous application was deferred- they are that further delays may be caused by the LDF consultation process and are further concerned that the designation of ASRC may even be abandoned when the LDF is finalised.

Chislehurst

No of comments = 8

All issues that were identified were agreed with by the Chislehurst Society and further close working with the Council was welcomed. Specifically for issue 3.33 on 'protection, access and management of commons etc be enhanced', the Society noted that the CSID notes do not reflect that many organisations devoted to the maintenance and upkeep of our open spaces (Trustees of the Common, Friends of the Recreational Ground, National Trust and, Friends of Scadbury)– your questions imply there are issues it would have been helpful if you had indicated what they are- the note should be amended to recognise the important work these groups do. There are two key shortages that limit their ability to enhance the protection access and management of the open spaces; funding, and the level of volunteering from the

public. Another responder thought that there could be improved partnership and cooperative working between all land managers.

Additional comment. Leisure and Heritage improvements could include an installation of BMX track at Walden Woods and the Heritage conservation of the moated manor at Scadbury Park.

Clockhouse, Elmers End & Eden Park

No of comments = 11

Neighbourhood issues identified in the CSID were all supported. It was thought NI 3.34 to be important for the character of the area that new residential development should be predominantly traditional housing rather than flats. It was considered that more investment would improve recreational, sports provision and allotments (NI 3.36), with suggestions for amongst others an installation of an outdoor gym at Harvington and at Croydon Rd and an installation of a youth facility at Churchfields.

On the question of 'what opportunities large vacant business sites offer?' (NI 3.38) Signet Planning came forward, on behalf of Altessen who own the remaining part of the former Glaxo Smith Kline site, they are seeking to re-develop this site within the lifetime of the Core Strategy. They consider the site is suitable for redevelopment for a residential led scheme as the site is no longer listed as employment for rating purposes. The site could provide recreational and sporting facilities that could be made available to the local community as well as improving the Beck environment and nature conservation.

A further 3 additional comments were received concerning provision for teenage recreation is limited leading to teenagers hanging out in green areas with little to do. Parks for younger children have been developed, something for teenagers like youth clubs and a skateboard park would be very useful and prevent the build-up of antisocial behaviour. There could be a timber station provided at Harvington.

Finally a point was made that in the re-development of shop fronts, or any change of use, planning permissions should include refurbishment and upkeep of the space between the shops or other uses.

Cray Valley, St Paul's Cray & St Mary Cray

No of responses = 20

All issues raised in the CSID created a positive response, indicating the identified issues were correct. NI 3.40- Asked 'what opportunities arise from the identification in the draft London Plan of parts of the Cray Valley as "Areas for Regeneration", to address the issues of multiple deprivation?' there were 3 responses. One stated that the return to the valley of Cray Wanderers and the creation of a sports village would generate a sense of identity and act as a focal point for the area. English Heritage sought to ensure that any unidentified heritage assets and wider environment is considered for its potential to be a catalyst for regeneration. And finally it was pointed out that efforts to address multiple deprivation must take account of the particular needs of the settled Gypsy & Traveller community.

NI's 3.41 & 42 on the question of improvement of housing stock, and was residential development desirable or needed? Drew a reminder from the GLA that loss of housing, particularly affordable housing should be resisted in line with the London Plan Policy 2.41.

NI 3.43 questioned were there opportunities to address employment needs through changes to the business area? Responses included supporting the flexibility to shift to retail and other commercial activities to better serve employment objectives and economic output, and agreeing that there are opportunities to address congestion and parking related to commercial activity through redevelopment by improving sustainable transport options. The rest of the responses were site specific:-

Crayfields Business Park- St Paul's Cray is currently designated a Business area with a finger of land designated as green belt currently occupied by a bowling club- it has become clear that in order to ensure the employment area is able to respond to the market demand for industrial and business units, the green belt area of land between the two parts of the business area needs to be included within the employment designation- as part of re-

development, it is proposed to re-locate the bowling club facilities on nearby land within Legal and General's ownership

Scotia Gas Network advised that due to changing methods of gas distribution being introduced the gas holder at St Mary Cray may be decommissioned prior to the end of the plan in 2031. Should this site become available for development in line with London Plan expectations to contribute towards the overall Industrial Business Park, the Core Strategy should actively encourage the production of an overall Development Brief to establish the key spatial planning principles for how the continuing shift from industrial to alternative commercial uses, including retail.

Klingers site - RPS on behalf of IKEA reminded that Core Strategy should be consistent with existing and emerging national planning policy which supports a flexible approach to employment creation through the development process. IKEA have a long standing interest in a developing a store in this area and are keen to open in this location at the earliest opportunity. If there is a demand for retail development in the it should be supported and potential sites allocated, particularly in established retail locations. A criterion based policy framework, reflecting the potential for a range of appropriate uses in this area would enable individual proposals to be considered on their own merits. This would allow Bromley to respond and adapt to evolving economic circumstances and pro-actively support sustainable growth through employment creation.

NI 3.45 on 'community engagement through enhanced leisure and social activities, especially young people' brought forward the responses of the creation of the Sports Village in the Cray area, and possible installation of child & youth provision at Riverside Gardens with the conversion of the redundant paddling pool to a sand play area and a BMX track, and the creation of a skate park at St Mary Cray Recreation Ground to name but a few ideas.

NI 3.46 on 'effective use of existing community venues and open space to support regeneration efforts' brought the suggestion of increasing usage at Duke youth centre to include GP information advice and classes such as yoga & fitness etc.

NI 3.47- It was clarified that issues for the wider community were the same for Gypsy and Travellers including accessing health, education and other community facilities.

The 2 additional comments reiterated points raised at NI 3.43 above, briefly: –

1. It is a stated objective of the Cray Wanderers to return to the Cray Valley benefits from this proposal inc training and academies for the club (youth teams, local clubs and groups) – generating a sense of local identity – focal point and driver for change-development of a sports village- mixed leisure/community and commercial, inc fitness club and sports arena.

2. Crayfields Business Park- St Paul's Cray is currently designated a Business area with a finger of land designated as green belt currently occupied by a bowling club- it has become clear that in order to ensure the employment area is able to respond to the market demand for industrial and business units, the green belt area of land between the two parts of the business area needs to be included within the employment designation- as part of re-development, it is proposed to re-locate the bowling club facilities on nearby land within Legal and General's ownership.

Crystal Palace Penge and Anerley

No of comments = 30

NI 3.51. It was generally thought that following the 'Area for Regeneration' being identified in the London Plan this would lead to improvements in the area. The Crystal Palace Triangle Planning Group responded that unemployment in Crystal Palace is by far the highest in Bromley. The map and table of Bromley local centres should show the full geographical extent of the Triangle District Centre, including the Croydon and Lambeth parts. Finally the Church Road side of the Triangle is in need of regeneration, and there is scope for enhancing Church Road as a retail frontage.

NI.3.55 It was considered that whilst there was a need to increase family housing in the area, there was limited opportunity with too many one and two bed flats but that the quality of the existing stock could be improved.

NI 3.56 The pressure on local parks could be alleviated it was suggested, by not developing a football club in Crystal Palace Park. Generally it was thought that the parks were not used in a

positive way and lacked facilities. Some suggestions for improvements were the installation of natural play facility in Royston Field, improved heritage feature in Penge Recreation ground, develop walking routes between Penge parks, re-develop community facilities (nursery/pavilion) and BMX track in and finally the restoration of canal and associated ecological improvements in Betts park.

NI 3.57 asked 'what is the future for Crystal Palace Park?' was considered an important local issue and there were 8 respondents.

Regarding the Masterplan it was thought to be a mistake to assume that the Masterplan has legitimacy in terms of public support. 'It is crucial that the vision for the Park, as determined by the Trustees, has enthusiastic public support and that the company appointed to undertake revenue generation has sound commercial credentials. Of course revenue generation will require infrastructure which will include an extensive pavilion and car parking facilities'.

Whilst 3 other respondents were strongly against the Park becoming a sports facility for a major local football club, it would have a seriously detrimental impact on the local community, destroying the experience of visiting the park, with a loss of additional park green space.

A consultation with both sides of the argument should be held. It was strongly felt the park was for use of the whole community and Regeneration of the park in keeping with its current community use would be welcome- keeping and improving the Sports centre and Athletics track.

WBRA want to see a vibrant park meeting the needs of the modern day family and do not want to see it developed for housing or other urban development, even to pay the costs of redevelopment of the park itself.

Crystal Palace Triangle Planning Group – Any use within or adjacent to Crystal Palace Park should only be accepted if it is compatible with public enjoyment of the Park. Additionally possibilities should be pursued with regeneration partners for the implementation of non-controversial improvements to Crystal Palace Park.

Finally Crystal Palace Football Club strongly believes that the proposal of a football club in Crystal Palace Park represents a truly unique opportunity that would bring significant benefits to both the immediate and wider area. A stadium can help breathe new life into both the sports centre and the park providing significant social, environmental and economical enhancements to the benefit of the community. A football stadium at Crystal Palace would be subject to an extensive planning application process.

NI's 3.58 and 59 on 'how can the public realm be enhanced' and 'opportunities to improve the attraction of Penge town centre and pedestrian environment' attracted the same response of 'more trees' and generally more support for local businesses and less larger chain stores. More specific suggestions were to pedestrianise completely the area by the Crooked Billet pub; buses can go down the High Street and stand/turn with the 176s on Croydon Road; have a few market stalls under the clock tower at weekends and expand the alfresco dining offering.

NI 3.61 asked how 'public transport links to Bromley Town Centre could be improved' and a suggestions included, an additional bus service along Elmers End Rd, Annerley Road and Annerley Hill , from Beckenham and Bromley centres, (the replacement of the 361 removed many years ago) would greatly enhance the accessibility of the Crystal Palace area to and from Beckenham and Bromley. And an extension of Tramlink to Crystal Palace.

There were 2 additional comments on issues that had not been identified in the Core Strategy Issues Document:-

The GLA explained that the 'Mayor has recently announced the further development of plans for the extension of the Tramlink network to Crystal Palace, and so TfL would recommend that the statement at para 3.1.10.14 'Plans for the extension of the Tramlink to Crystal Palace are unlikely in the short term' is refined to take account of this'

And the Crystal Palace Triangle Planning Group pointed out that the Crystal Palace District centre and the Upper Norwood residential area are distinctive from Penge and Anerley. And that the Core Strategy should recognise its wider function by designating the Church Rd Shopping frontage as an integral part of the Crystal Palace Triangle District Centre.

Darwin & Green Belt Settlements

No of comments =5

NI 3.62 asked 'what are the trends in the rural economy and what opportunities are presented by redundant buildings in the Green Belt? There were 2 responses, one stating 'presently the future is bleak. Very little 'real farming' is taking place. With regard to redundant farm buildings, conversion to small light industrial, warehouse or office use is perhaps most appropriate where there is reasonable vehicular access. Otherwise conversion to residential', And the other making the suggestion that there may be opportunities to bring buildings at High Elms into usage as a rural craft flagship centre.

NI 3.65 asked 'how can issues relating to Gypsy and Traveller pitches be addressed?' The 'Gypsy & Traveller Project' replied that there are a number of pitches along Layhams Road which only have temporary permission. These travellers are established in the area with their children in schools just across the borough boundary in New Addington. In the absence of any new pitches in the vicinity these temporary pitches should be made permanent to meet the demonstrated need.

NI 3.66 'What challenges are presented by the subdivision and sale of farmland' a suggestion was made to investigate opportunities for land acquisition by LBB to prevent development, increase public open space and enhance maintenance and biodiversity.

There were 2 additional comments on issues that had not been identified in this area:--

1. Investigate options for 'Quiet Lanes' installation of vehicular restrictions. Potential Woodland burial site at High Larches. Biodiversity enhancements and improvement throughout green belt area, and a natural play facility at High Elms Country Park.
2. There are possibilities for sustainable development to south west of the borough close to New Addington associated with an extension of the tram line. However this needs to be considered in the round and included in a thorough review of potential and green belt suitability.

Eastern Green Belt

No of comments = 2

There were no comments on neighbourhood issues regarding employment opportunities, protection of the green belt and sustainable farming, recreation facilities, but there were comments on NI 3.72 'opportunities to support the Green economy and does it present opportunities for the landscape to be improved or enhanced?'. The responses were that in the eastern green belt there was the potential site for timber station; partnership working with private landowner to provide (legal) off road motorcycling facility, and to investigate options for Quiet Lanes; and the installation of vehicular restrictions.

NI 3.73 – 'How can the particular issues relating to the travelling Gypsy and Traveller community in this area be addressed?' One response received stated there are 2 pitches in Hockenden Lane with only temporary permission. In the absence of available pitches these should be made permanent. There are 2 authorised sites in the area Old Maidstone Rd and Star Lane. These are well occupied. Over the period of the Core Strategy (20 yrs) there will be significant pressure for additional pitches from within the existing Gypsy and Traveller community as children grow and have their own families. The Core Strategy must show how the additional; pitches will be provided by the expansion of these existing sites or providing a new site.

There were no additional issues raised for this area.

Farnborough and Crofton

No of comments = 16

NI 3.74 'What opportunities exist to improve the availability of primary healthcare?'- comments received requested that following the merger of the Crofton Road and Starts Hill surgeries bus services to and from the new merged operation should be improved to allow better access. The South London Health Trust stated they are considering all of their options to make better use of the PGMB Education Centre and Day Surgery Unit at Princess Royal University Hospital. Additionally the Healthy Urban Development Unit – encourages dialogue

around the implications for the core strategy of the NHS South East QIPP Plan and the emerging estates strategy.

NI 3.75 on the issue of parking pressure around the Princess Royal University Hospital responders were divided that no further provision for parking should be made at the hospital and a long-term goal should be to reduce parking and instead the bus services to and from the hospital should be substantially improved so there is less incentive to travel to and from the hospital by car. Whereas two respondents suggested that an attractively designed second deck could be provided above part of the existing car park, the design needs to be good (Local residents would not accept a unit similar to that constructed at Tesco, Elmers End) with the aim of trebling the current parking provision.

The South London Health Trust stated they are considering all of their options to make better use of the PGMB Education Centre and Day Surgery Unit at the Princess Royal University Hospital.

NI 3.76 asked 'what is the scope for community groups to assist in improving their environment?' and the suggestions were developing a 'Friends' group for Crofton Heath area and advising to investigate opportunities for land acquisition at Crofton Heath, to prevent development, ensure public access.

NI 3.77 on the issue of 'future challenges are posed by Biggin Hill Airport was considered very important to local people and brought 4 responses all wanting to strongly resist any proposals for development at the airport which would make any increase whatsoever in the present level of noise, this included expansion in anyway, neither in amount of air traffic or opening hours...pollution from it has got steadily worse. There was also a suggestion that Biggin Hill could be converted into an air museum and conference location, which would bring more jobs, visitors and help to the local economy.

Additional comments -Two further issues raised concerned young people in the area with 'Youth disorder is a constant headache in the Crofton area. There is a lack of visible policing, and very little for teenagers to do in the evenings - the end result is disorder and petty vandalism which spoils the feel of the area for all residents. More needs to be done to provide constructive activities for young people in Bromley. A suggestion was made of installing an out door gym at Farnborough Recreation ground.

Hayes

No of comments = 8

NI 3.78 This issue asked if there is a need for improvements to public transport with other parts of the Borough? Suggestions included 'Develop walking routes through privately owned land (Rookery Estates). Improve local public transport connectivity; there is presently no bus link to Beckenham or West Wickham, link to West Wickham would be needed as a minimum.

NI 3.79 on opportunities to improve services and facilities for the elderly Hayes Village Association suggested that the demolition of 47 flats at Hayes Place from being prevented.

NI 3.80 on the 'need to address starter homes and accommodation for the elderly', Hayes Village Asscn commented that there is no suitable accommodation for housing elderly people within the community

NI 3.82 'Can any of the problems of with on street parking in some residential roads be addressed and the Hayes Village Association suggested 'enforce the existing parking restrictions'.

Additional comments- 2

1. Hayes Village Association said the south part of the High Street badly needs improving to make it, shopper, business, and visitor friendly. The pavement on the east side needs to be wider, and trees along both pavements would help to make it a more attractive place. The commercial activity schedule should include the George Inn, the farm, the car showroom on Hayes Street and the Petrol filling station at Station Approach.

2. Cllr Manning suggested that the empty office block, Global House in the car park behind Station Approach could be converted to residential use. If UNITE were to vacate their building, there is also potential for the building to be converted to housing or hotel use?

Keston

No of comments = 9

NI 3.85 This issue asked about whether the local shops and facilities on Heathfield Road can be protected. The responses suggested that steps should be taken to restrict vehicular traffic through Heathfield Road. The frontage of the shops on the NW side of Heathfield Road is wide enough to enable a small carefully designed pull-in for several cars to park whilst purchases are made. Parking time would need to be strictly limited to 10 minutes, helping to strengthen the retailer's opportunities to build their businesses. Shops in Heathfield Rd must be protected in a way that allows them to survive to serve the predominantly older population; the village store and Post Office are invaluable. The way to protect these facilities is through appropriate and sensitive planning regulations.

Additional comments. 7 including the creation of a green walking/cycling route was suggested with a route running from Keston to Bromley Town Centre and beyond towards Lewisham. Potential development of angling facility/management at Keston Ponds.

A request that the Green Belt should be reviewed and consideration of the removal of the garden centre from the Green Belt designation as it does not fulfil the objectives of PPG2. The Council should allow greater flexibility for previously developed land within the green belt to meet housing need. It was argued that the Issues Document pre-empts that Keston is not considered a suitable location to accommodate any future housing provision; it appears to be a pre-emptive decision that gives weight to the protection of MOL and the Green Belt. It was not considered that the current approach to Keston provides for the opportunity for future people to live in the community. Also the 'Drift' site in Keston is considered to be a suitable size to accommodate future residential development.

There is a need to plan for the Burial needs of Keston and the wider area in the Core Strategy. The provision of a burial ground in the green belt adjacent to Keston would be appropriate.

It was pointed out that a recent application at a Gypsy and Traveller site in Keston for 8 extra caravans was refused and will be going to appeal; this indicates the continuing need for additional pitches.

Mottingham

No of comments = 4

NI 3.87 What opportunities arise from the identification in the draft London Plan of parts of Mottingham as "Areas for Regeneration", English Heritage are keen to ensure that any unidentified heritage assets and wider historic environment will be considered for its potential to be a catalyst for regeneration and a stimulus for high quality design.

There were no additional issues raised.

Orpington, Goddington and Knoll

No of responses = 19

The most important issue was NI 3.94 'how can Orpington's role as a town centre employment focus be maintained and enhanced'? Comments included making more use of the village hall for bands and musicians to perform. A new cinema was also seen as a good idea as would be the upgrade of the Walnuts sports centre.

The Orpington masterplan raised the possibility of a new entrance to the leisure centre which was seen as important to enhance the town centre and increase footfall. It was also highlighted that the car park of Orpington College and Orpington hospital could be utilised for future development potential.

Three additional issues included redevelopment of the Pavilion at Goddington Recreation Ground. Redevelopment of Priory Gardens; landscape and depot including toilet/facility block. New youth provision (skate park) and expansion of allotment site at Poverest recreation ground.

Another respondent highlighted that setting targets which would exceed London Plan or National Standards would hinder development which might come forward in the future which would in turn frustrate Bromley Town Centres aspiration to remain competitive with surrounding centres as well as London.

South London Healthcare Trust have given notice to NHS South East Sector that they will be withdrawing their services from Orpington Hospital with effect from the 1st April 2012. Services are dwindling at Orpington Hospital and the number of patients being cared for on site, are not commensurate with the NHS resources being consumed. Following the planned closure of Orpington Hospital, options for relocation are being considered. NHS South East London sector will be relocating some services in Orpington, and other Trust Hospitals. The PRUH will be retained as a major centre for clinical care.

Petts Wood and Surrounds

No of comments = 10

Petts Wood Residents Association (PWRA) have made several responses in respect of NI's 3.99-3.103.

NI 3.99 - 'What opportunities exist to improve the traffic flow around Petts Wood Railway Station and how can car parking be better managed?' the PWRA review highlighted there should be an on-going examination/review to address residents issues with commuter parking.

NI 3.100 - 'How can the vitality of Petts Wood as a retail centre be supported and enhanced'? Residents highlighted that there are too many cafes and restaurants in Petts Wood and the Core Strategy should incorporate policies to restrict an over representation of a certain use class if necessary.

NI 3.101-'How can the development over time be managed to maintain the suburban residential character of the area? A visual statement is highlighted as being beneficial for the areas when designating Areas of Special Residential Character (ASRC). Whilst the one metre side space policy in the UDP is in place for 2 storey extensions could this be expanded.

NI 3.102- 'How important is space to the side of dwellings and back gardens in retaining the character of Petts Wood and Surrounds'? Some residents have sought to over develop their properties. Maintaining a refusal to grant planning permission for backland development is key to the retention of the area.

NI 3.103- 'What are the implications of the growing numbers of cafes and restaurants'? This NI was stated as an area of concern for many residents. It is viewed by residents that there are too many cafes and restaurants in Petts Wood high street. It is perceived by some that this has led to an increase in crime and anti-social behaviour. Policies should be put in place to ensure there aren't an over concentration of cafes and restaurants but a preferred mix of shops. Having greater consistency when granting premises licences may help to address this problem.

There were four additional comments. Some of the main comments included building a replacement pavilion at Willets Recreation ground and creating a new Petts Wood Road to Franks Road to alleviate congestion at Tudor Way. It was also highlighted that Randolph Road, Bromley could be used as a suitable site for residential development.

Ravensbourne, Plaistow & Sundridge

No of comments = 10

The most important issue for this area was NI 3.108 'what contributions does the Bromley [North-Grove Park branch line make to the area and can it be better utilised'?. Of the respondents several said that the branch line is key and even ask that Network Rail think about accommodating 'through trains' during commuter periods to help local residents around

Bromley North. Other suggestions include introducing a farmers market at both Bromley North and Grove Park stations and utilising very picturesque commercial premises.

There were two additional comments. It was highlighted that increased number young families in the area meant there are issues for education there is also a need for more and enhanced play areas and other facilities e.g. toilets near the playground off Burnt Ash Lane.

The second additional issue highlighted development of Brook Lane Community growing project. Enhance play facilities and extend Plaistow cemetery at Kings Meadow to increase burial provision and improve recreational use. Investigate options for east-west link through Sundridge golf course (ALGG).

Shortlands & Park Langley

No of comments = 11

In response to NI 3.109 'how can the distinctive character of the area best be maintained' suggestions included maintaining ASCR's designations and extending or creating new conservation areas to preserve the attractiveness of Edwardian and Victorian properties.

In response to NI 3.110 suggestions included resisting development where Edwardian or Victorian properties are to be demolished & maintaining open spaces which make such a vital contribution to the streetscene.

Regarding NI3.111 'are there any additional issues which we have not identified' suggestions included seeking opportunities to exploit the existence of St Peter's Hall which can accommodate large and small groups. It has also been highlighted that the redevelopment of Langley Court presents the opportunity to provide future community facilities.

There were 4 additional comments covering various unidentified issues:-

The first requested that the north eastern boundary be redrawn to the north eastern boundary so that it ran along the line of A21 London Road. There is of course the total lack of secondary schools in the area but we recognise the difficulty of providing one. Another response called for the installation of sculpture/nature trail at South Hill Woods and Mill Pond. Another respondent identifies that whilst properties generally have large private gardens, the majority of the area has limited access to public open space. The pen portrait acknowledges the vacant Langley Court site as lying within the neighbouring Eden Park pen portrait. However, the site also lies geographically adjacent to the Park Langley/Langley Park areas and therefore any opportunities/facilities provided by the redevelopment of this site (Langley Court) would be relevant to the residents of these neighbouring communities. The site should be viewed in the context of both pen portrait areas.

West Wickham & Coney Hall

No of comments = 9

One of the main issues raised was NI 3.115 on the issue of All Saints/John Rigby School site. One respondent called for the existing building (despite its Green Belt location) to be converted or replaced for housing/employment/business opportunities whilst another respondent highlighted that future development could be restricted due to the sites designation.

There were five additional comments including that there was no mention of the new Hawes Down Centre in the CSID; a suggestion to install youth facilities (ball court) in Coney Hall Recreation ground and Improve sports and play provision at Blake Recreation ground. Cllr Manning suggested that 'As for possible future development – negligible due to large amounts of Green Belt, although the former All Saints School buildings/site are empty, while in the green Belt.

Finally the Environment Agency stated that the River Basin Management Plans have a Programme of Measures setting out objectives for water bodies to achieve good ecological status- the borough has a high reliance on its groundwater resources (e.g. it is the main source of potable water for the borough, and feeds the boroughs watercourses), we will expect more detailed reference to the Water Framework Directive to be made within the actual Core Strategy and supporting documents.

Living in Bromley

No of comments = 168

Retaining distinctive character and quality of life and supporting the improvement of less attractive areas

It was noted that better shops, encouraging small businesses and the protection of open space is key to maintaining the desirability of the Borough. Preserving the Green Belt, Metropolitan Open Land and open space should also be a priority. The following designations were highlighted as needing protection:

- Conservation areas
- Areas of special residential character
- Sites of special scientific interest
- Local nature reserves
- Scheduled ancient monuments
- Sites of interest for nature conservation

It was also noted that farmland should not be broken into pockets of unrecoverable investment land.

English Heritage highlight that the conservation of Bromley's particular character is a key issue for the Borough. They suggest that Section 4.1 of the document could articulate the Borough's historic character as an appropriate introduction to Issue 1.

It was suggested that Bromley as town needs to offer better infrastructure particularly in terms of leisure. This could include improving the shopping centre to what it was 5-6 years ago i.e. before the demise of Allders and House of Fraser and the establishment of a large Primark (attracting less affluent shoppers). This has had a detrimental effect on restaurants, bars and cafes. It would be advantageous if the Council could encourage smaller businesses (cafes and shops with home ware).

New Housing and Supporting Infrastructure

It was noted that the majority of new development will have to come from the north of the Borough and provide mixed tenure schemes where opportunities arise i.e. Blue Circle, Horkam and Alkon towers. Existing brownfield or derelict sites should be used as a priority. It was considered that disused poor quality industrial land should be considered for housing purposes and facilities (including housing) should be spread all over the Borough. It was also suggested that housing should be kept to brownfield sites within existing residential areas.

It was noted that housing should be provided in locations which can accommodate growth without harm to local historic character. In addition this new development should take into account the provision of infrastructure, business premises and churches. One point was raised that it would be preferable to sacrifice an element of the Green Belt (2.5%) rather than compromise character and quality of life in areas already full. In addition to this another point was made stating that Green Belt hamlets should be expanded and identified as villages.

It was suggested that new housing would be best accommodated near transport links but new infrastructure is required to support the growth in the number of homes. It was suggested that there seems to be a reliance on Bromley South Station in terms

of transport infrastructure. This situation could be improved through making improvements to Bromley North and extending the DLR.

Overdevelopment of the area (relating to Aperfield Green Belt Action Group) is considered a danger to the quality of life and infrastructure of the area and has already started to lead to more noise and anti social behaviour changing the quality of life for many.

The Greater London Authority highlighted that the estimated capacity for 470 dwellings per annum is below the 500 dwelling per annum annual monitoring target in the London Plan which the Borough should seek to achieve and exceed. The Borough's intention to promote new, higher density development in Bromley town centre in accordance with the AAP is welcomed. Later drafts of the core strategy should address the issue of residential density and seek to optimise housing potential. The Borough should ensure all new developments optimise housing output, taking into account local context and character, by incorporating the density ranges set out in table 3.2 of the London Plan in line with Policy 3.4 of the London Plan.

It was acknowledged that housing policies need to reflect a mix of housing types, tenure, reflect need and requirements and show how these will be met across the whole Borough. CSID has no clear substance and the Draft National Planning Policy Framework and PPS12 require core strategies to set out how much development is intended and when and how it will be delivered.

It was highlighted that a SHMA has not been produced to address the emerging requirement of the DNPPF and need throughout the Borough. It is important to show the right amount of housing, at the right time, in the right place to support a range of affordable and open market housing. This is necessary to ensure, in accordance with paragraph 9 PSS3 that 'everyone has the opportunity of living in a decent home, which they can afford in a community where they want to live'.

It is considered that the market for flats outside of prime central London locations remains very weak, and have significant upfront funding requirements that are difficult to find sources for and most such sites therefore have very questionable viability. It is therefore imperative that an undue reliance is not placed on flatted schemes. Sites need to be found for standard family housing which funding is available for, a market for the product exists and has a real prospect of actually being built. This coincides with the needs and desires of the population generally and indeed with the profile in Bromley. It is worrying that the consultation refers at paragraph 4.1.9 that there is capacity for 470pa with 40% of that in town centre flats at high densities. This is not stated as a proposed policy but it is evident that there needs to be a radical change from this to deliver the established scale of housing required.

It was stated that a Borough wide SHLAA has not been produced and the Council's five year supply paper does not include a trajectory that extends to 10-15 years as required by PPS12 paragraph 55. Without an available evidence base it cannot be determined if the housing requirement is deliverable or where suitable locations may exist to provide such growth, and therefore the core strategy is considered unsound.

It is considered that the amount of housing needed is regarded as a primary matter and the requirements set out in the London Plan need to be met (figure of 565 / annum quoted in one instance). These are not just targets to be aimed for. The Core Strategy needs to set out a timescale up to 2027 in terms of addressing future housing supply. The NPPF has been confirmed as a material consideration and is a

clear indication of Government Policy that aims to increase housing significantly. It also requires an additional 20% to be added to any five year supply of deliverable housing. It is important that the right type of homes are actually built and not just planned.

In terms of housing provision the CS only refers to provision over the next 10 years, not the next 15 years. The London Plan and PPS12 (para 4.13) specify that LDFs must provide 15 year targets. The requirement in the CS should be 15 x 500 dpa starting from the date of adoption. Paragraph 4.1.11 of the CS refers to new households, migration and 4,000 households experiencing housing difficulties. The identified future requirement far exceeds estimated capacity and there is no indication how meeting this requirement would impact upon existing policies / issues. The CS does not consider any alternatives to the current approach – i.e. increasing the annual target of 500dpa. Although a five year supply paper has been produced the number of dwellings identified is not realistic based on historic levels of performance.

The Highways Agency's interest in Bromley's Core Strategy relates to the potential impact of proposals on the safe and efficient operation of the M25, in particular junctions 3 to 5. These junctions experience high levels of congestion particularly during peak periods. We would be concerned if any material increase in traffic were to occur on these sections of the SRN as result of development in the London Borough of Bromley without careful consideration of mitigation measures. Important that the Core Strategy provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Disability Voice Bromley (DVB) highlighted that new and re-developed housing should be built to Lifetime home standards/design criteria and other developments should also include access requirements as well as design standards. Many disabled people find locating accessible properties a difficult and frustrating process. Given that only 15% of properties in England and Wales are accessible, the strategy should include targets and measures. Bromley should sign up to the London Accessible Housing Register (LAHR), a framework developed to make better use of accessible housing stock giving disabled people informed choices about how and where they live. DVB suggest that this is added as a target for 2012/13.

Various sites listed as 'suitable' for housing / SHLAA including;

- Bromley Town Centre
- Site L Westmoreland Road
- Langley Court subject to discussions (include in any future SHLAA)
- All Saints (former John Rigby Secondary School)
- Land south-west of Randolph Road Bromley
- Land to the south-east of Belvedere Road Biggin Hill
- West Camp
- Global House, Hayes
- Empty office block in LBB car park behind Station Approach
- Unite (housing/hotel?)
- Keston Garden Centre

Biggin Hill was identified as an area for potential growth but transport links would need to be improved. Providing more housing in Biggin Hill would help to support the economy and attract business into the area.

Provision of housing to reflect the varying needs of the Boroughs' population.

It is considered that by actively supporting retirement housing larger properties can be released back into the housing market and make more efficient use of the stock. There is a need to plan for specialist retirement homes (possibly within the Green Belt). Significant emphasis should be placed upon the ageing population, the underlying demand for owner occupied retirement housing is currently substantial and will grow in the future, suggesting the need for substantial growth and more dwellings that reflect the demographic shift in the population are needed.

The Greater London Authority specify that affordable accommodation to meet the needs of older Londoners is supported in the London Plan and the Borough may wish to address this issue in later drafts of the CS. None of the strategic issues raised at the end of this chapter directly address affordable housing which is a significant omission. Later drafts of the Core Strategy should set out the Borough's approach to affordable housing, taking into account the recent changes to PPS3 and indicating how much affordable housing will delivered in the plan period.

It was noted that the Council's affordable housing policy should be flexible to allow provision to be provided on site in the first instance but also off site or as a payment in lieu in exceptional circumstances to reflect varying residential characteristics and the need in some areas for regeneration.

Designations in the Draft London Plan

The Borough should accept the work done for the London Plan.

English Heritage highlight that in relation to Areas for Regeneration any identified heritage assets, and the wider historic environment, is considered for its potential to be a catalyst for regeneration and stimulus for high quality design (PPS5, HE 3.1).

Implications of the ageing population for Bromley's places

The following issues were identified; a need for more burial space, a need for more specialist housing and care facilities and specialist retirement accommodation may need to be provided within the Green Belt (given the limited land available and distribution of the ageing population).

It is considered that an ageing population will place increased demands for the "care" aspects of Local Authority social service obligations. There will be more single occupancy residents requiring supplementary support for their relative self-sufficiency and more demand for social accommodation from the less able.

It was noted that with an ageing population there are no private assisted/extra care housing schemes available in the Borough. This forces vulnerable elderly residents to stay in their homes when they don't necessarily want to, leaving them lonely and afraid. Suitable private assisted living housing schemes need to be encouraged.

Challenges for young people

It was suggested that young people face various challenges including unemployment, lack of opportunity and boredom. One of the main challenges for young people was cited as the ability to buy their own home. The Borough should therefore provide support to developers/housing associations in developing more homes. It is also important that Bromley supports the new initiatives aimed at helping

people buy their first home. With the national average age of first time buyers over 37 years, it will be important to find opportunities to help younger people through low cost home ownership schemes and intermediate rental products.

Sufficient school places were highlighted as a challenge in addition to the need to provide good training opportunities. Greater social integration is seen to be achievable through the provision of better schools, more community centres, maintenance of open space and a change in attitude by the planning department to enable more places of public worship to be built.

A principal challenge was identified as finding "out-of-house" activities (sport, hobbies, music, etc) that are preferred to "in-home" electronic activities to experience and develop inter-personal relationship skills.

Opportunities to promote healthier lifestyles and improve health generally

The following opportunities were highlighted:

- More carefully designed cycle routes linking population centres to transport nodes
- Car parking should be reduced
- Cycle parking facilities should be increased to promote cycling
- Open spaces should be maintained to encourage healthy lifestyles
- Safe walking areas should be provided
- Green Infrastructure and open spaces provide opportunities for health and leisure
- PPG2, PPS 1 and 9 can help provide support to maintain, enhance and increase natural environments and habitats
- Linking health to Green Infrastructure can help meet and combine the above two areas
- Schools should be discouraged from disposals of recreational facilities and encouraged to develop and expand existing facilities and out-of-hours activities
- Other users should also be accommodated within existing schools accommodation
- MOL to western edge of Park Langley (Harvington Estate) should be defended from further development as it provides an opportunity for residents of all ages to enjoy a healthier lifestyle whilst appreciating the environmental quality of the area.

It is considered that physical health and wellbeing is very important in addition to mental and moral wellbeing. People with disabilities and carers are keen to be involved in design and development of facilities they want to use. Involvement at an early stage can save money and increase opportunities for disabled people.

It was noted that the following issues should be taken into consideration;

- The role of the voluntary sector in general and faith communities in particular in supporting the quality of life in the Borough and area
- Tackling social exclusion and inequalities including crime and fear of crime
- Need for a clear marker in LDF preparation of need to promote sustainable communities and encourage diversity and equality in planning
- Need to ensure provision for the voluntary sector including faith communities
- Need for space to operate, and to ensure the recognition of places of worship as part of the infrastructure for sustainable communities.

This issues document needs the words "places of worship" inserted in paragraph 2.0.4 following the word healthcare. Prosperity of communities requires proper provision for a spiritual element in care of whole health, illustrated in the RTPI Good Practice Note 5-part C-2008. The Fairworth Trust expects growth over the Plan period due to an increase in numbers of families attending and is currently seeking sites for new and replacement Gospel Halls and private school in the Borough.

Reducing crime and anti social behaviour and fear of crime through development?

It was suggested that care in the detail underpinning every development is required to reduce crime and anti-social behaviour. Poorly designed environments create frustration and result in a gradual deterioration. They tend to be badly maintained, littered and generally uncared for, which just leads to the downward spiral towards crime and anti-social acts of vandalism. Well lit, well maintained, cared for environments encourage local effort to assist each other and the neighbourhood benefits.

It was highlighted that people with learning disabilities are twice as likely to be bullied as non disabled counterparts. Waiting for and travelling on public transport identified locally as main area of concern. Integrating these issues into both design and the operational delivery of services, transport, policing and retail, will go some way to mitigate their concerns.

The following suggestions were made:

- Town centre development that encourages older people to come into the town in the evening
- Less inducement to cheap drinking and clubs
- Need for activities for young people, sport and training for jobs
- With careful thought during the design process it is possible to influence how safe residents feel in their homes, policies should encourage visibility from living room windows
- Provide better community services
- Promote the moral wellbeing of the Borough
- Ensure architectural design provides for open vistas and incorporates security features while maintaining architectural integrity.

The Metropolitan Police recommend that reference is made within the Core Strategy to 'Secured by Design' principles in line with the Metropolitan Police's 'Secured by Design' accreditation. The inclusion of 'Secured by Design' would ensure consistency with the requirements set out by both national and regional policy. The following sentence is recommended for inclusion within the 'Supporting Communities' chapter of the emerging CS "The Borough will expect development proposals to reflect the principles of Secured by Design".

Affinity Sutton state that in addressing Issue 10 a combination of considered development and proactive neighbourhood management should be used. Reference is made to a two day neighbourhood appraisal of Mountfield estate to understand from as many residents as possible how they viewed their neighbourhood. Results taken from a 60 percent return showed that antisocial behaviour and lack of activities for young people were the key issues of concern for residents (35 and 21 per cent). The most frequently cited antisocial behaviour issues were fly tipping, graffiti and vandalism. Drug use was also a common concern. Additional services people would

like to see were activities for young people, sport and training for jobs. In response to these findings Affinity Sutton organised two clean up days at Mountfield and provided a weight and load service to get rid of some of the bulky waste. The clean up days are part of the partnership working with Bromley's Environmental Health and Anti-Social Behaviour Team. Affinity Sutton recognises the need to continue to address fly tipping on the estate and have organised a weight and load service a couple of times a year. The feedback has been very positive and the van is always full. To date 1.4 tonnes of bulk has been removed and fly tipping in the area has dramatically decreased.

It is considered that these services should be provided and funded in many other locations by the Council. There is a strong case for extending and improving the refuse collection service to improve the removal of bulky items and tackle fly-tipping. Provision of activities for young people is important to all residents whether wishing to avoid noisy games (often perceived as antisocial behaviour) or to relieve boredom so areas for play are incorporated into development plans by Affinity Sutton. Castledene Road (Anerley) includes a multiuse games area and in other areas of the country areas for informal play have been provided in keeping with the local environment.

The Gypsy and Traveller community.

It was noted that adequate space should be allocated for the gypsy and traveller community wishing to live in caravans. The London Plan has not given a clear target for new pitches but the Core Strategy needs to assess the needs of and make provision for gypsies & travellers. There should be provision for the gypsies & travellers currently in temporary sites and for the children of gypsies & travellers already living on sites. The Council should investigate whether it needs to provide for gypsies & travellers who have already been forced into houses who have a psychological aversion to bricks and mortar.

It was highlighted that the Gypsy and Traveller Accommodation Assessment of need within the Borough should be adhered to and the specific Borough target met and delivered in a reasonable timeframe. Bromley should commit to delivering 96 pitches 2007-2012 and a further 23 pitches for 2012-2017 – this includes catering for the needs of Travellers who are inappropriately housed. The Panel into the Draft Replacement London Plan stated the needs of those in bricks and mortar ought to be addressed and an additional allowance added to the 268 pan London minimum figure.

It was suggested that the high cost of land in London means a large majority of pitches will need to be treated as affordable and suitable means of delivery of pitches on the ground developed. Planning policy should lay out the number of pitches to be accommodated and a trajectory for delivery to 2017. It was acknowledged that there is a need for a criteria based policy which will help guide allocations and meet unexpected demand, indicating how site allocations will be met in a reasonable and timely fashion.

A point was raised that good communication between Friends, Families and Travellers, Traveller Law Reform Project and the Borough is necessary in accordance with Circular 1/2006.

Supporting Communities – Facilities and Services

Number of comments = 45

Demographic Challenges and the Changing Nature of Services

The London Plan reference that 'a growing and increasingly diverse population will create demand for more social infrastructure' was highlighted. Comments made particular reference to

- Policing and criminal justice.
- Requirement for more space for all aspects of life to be reflected in policy and site allocations
- The importance of intergenerational contact was highlighted - schemes for young people and older people to meet suggested eg helping at care homes, local history projects etc
- Providing greater choice and options for housing which helps to address some of the identified wider health, safety, and general wellbeing objectives
 - pro-active policy support for retirement housing, close to the key centres within the Borough unburdened by unnecessary infrastructure contributions.
 - Ensuring accessible social housing of various sizes. Some with facilities for live in carers
- Design features should incorporate the needs of people with multiple disabilities as more children and young people with complex needs come through the transition from schools into adult services in the community.
- A widespread network of facilities in parks across the Borough to suit all ages.

Extended or multiple use of educational facilities. Bromley College note that the role of colleges in the future may be enhanced, students may be attracted away from universities to colleges offering courses at a lower price. The Green Belt designation could be an impediment to the College expanding to meet these changing needs.

South London Healthcare Trust's estates rationalisation to improve the efficiency of the provision of healthcare across the Trust's various locations. In particular it was noted that the number of patients being cared for at Orpington Hospital are not commensurate with the NHS resources being consumed.

Geographical Spread of Facilities

It was highlighted that community facilities (and accommodation) for children and the elderly in particular must be met within the immediate community in which they are living. In some parts of the Borough, to the south, comments suggest that these needs may therefore need to be accommodated within the Green Belt. The availability of appropriate transport flagged as a key issue in accessing existing facilities.

The Healthy Urban Development Unit highlight the significant reconfiguration of health services in respect of

- Acute services affecting the PRUH ("A Picture of Health")
- Development of urgent care services
- Primary care provision – GP "hubs" in Orpington, Beckenham and Bromley
- New models of integrated care services
- Estate rationalisation – South London Healthcare Trust flag their proposals to improve the efficiency of the provision of healthcare across various locations.

Following the withdrawal of their services from Orpington Hospital some services will be relocating in Orpington, and on other Trust Hospitals.

Comments received by or on behalf of residents raise the following points

- Ensuring that the PRU hospital has sufficient transport links from all parts of the Borough and on street parking is not problematic
- Ensure that elderly people in particular can reach health services easily given the aging population and rationalisation of services onto fewer sites.
- Concerns about access to A&E with the on-going rationalisation of hospital services across the region
- The importance of retaining specialist facilities e.g. the hydrotherapy pool on the Bassetts site, and suggest that the Borough should seek to retain it or ensure a suitable alternative is in place as part of the redevelopment.

Comments highlighted that Youth Provision across the Borough is challenged with few facilities, especially to the East of the Borough. Much leisure and social activity is clustered in Bromley Town Centre. Pelling for Cray Wanderers FC highlight potential benefits to the Cray Valley of a proposal for a Sports Village.

Places of Worship were referred to in numerous comments, and the role of the voluntary sector in general and faith communities in particular in supporting the quality-of-life in the Borough was highlighted. It is suggested that the authority should focus on the need to tackle social exclusion and inequalities, promote truly sustainable communities and to encourage diversity and equality. Specifically it is suggested:

- There should be a specific recognition of places of worship as part of the infrastructure for sustainable communities, using the London Plan terminology in respect of social infrastructure.
- There needs to be identifiable buildings which are clearly sacred places
- There should be adequate provision for churches and places of worship right across the Borough. As the Borough has developed churches and community centres have been left behind, Orpington specifically highlighted
- Problems associated with finding a vacant church, or getting planning permission to convert, or build a new church building, large or small is next to impossible in Bromley.
- Consider supplementary planning guidance as produced by Croydon and Thurrock.

There should be protection to ensure continued theatre use and performing arts facilities, especially in other venues particularly where buildings don't benefit from protection through listing or conservation area designations

Retained and Improved Facilities

There is support for a Borough policy to promote and protect existing established community facilities, particularly in the face of higher demand for an alternative use. London Plan 2011 Policies 3.1 "Ensuring equal life chances for all" and 3.16 "Protection and enhancement of social infrastructure" highlighted as important. The loss of an existing facility should be resisted unless it can be demonstrated that the facility is no longer needed, or it can be established that the services provided by the facility can be served in an alternative location or manner that is equally accessible by the community.

The following comments were made in respect of enabling / supporting facilities

- Land should be allocated specifically for elements of community infrastructure to avoid the continued squeezing out of community needs by more commercially attractive housing and employment uses.
- The Council should allow enabling development to release some value from land eg development in Thornet Wood Road could support the maintenance of a protected tree belt.
- New facilities, when required, should refurbish and re-use existing buildings if possible (as this usually requires less energy than new build) Dual use School land could be utilised for park land or even agricultural land leased to farmers. Eg Richmal Crompton Park
- The key to improving community facilities is investment both in terms of finding out what is needed where, and funding the changes required. The Turpington Lane Community Centre, refurbishment highlighted as good practice (Affinity Sutton)

Opportunities to Enhance Recreation and Leisure

New development should enhance recreation and leisure facilities through Community Infrastructure Levy (CIL) planning gains (Section 106 agreements) or other grants to supplement shortfalls.

Existing parks and open spaces could offer additional health benefits through

- the provision of outdoor gyms encouraging those unable to afford or feel comfortable in a conventional gym to be able to exercise. Suggested that funding could come through new developments (s106)
- Enhance access
 - for walkers and cyclists working with landowners to open up public access to the Green Belt for the urban population
 - across parks and green space sites implementation of DDA audit

Upgrade existing or increase provision of sports facilities & pavilions, cafes with toilet facilities in parks & open spaces eg

- Provide facilities to enable programming of events in parks (investigate charging options for new uses within parks eg fitness classes)
- provision of stages, lighting and sound facilities, open air cinemas and IT enablement.
- Toilet provision in open spaces (in partnership with commercial organisations)

Other comments suggest

- Redundant pubs can be transformed as alternative community venues to provide a range of performance spaces, for new plays and dance, and live music and comedy, to make a vibrant contribution to the evening economy and to help ensure their survival.
- Development of multi-use sites incorporating health/community facilities
- Identification of new allotment sites through new partnerships with private or third sector organisations
- Creation of honey-pot sites which can be utilised as tourist destinations through promotion of heritage and natural landscapes
- Acquisition of land, particularly in areas of deprivation
 - to open new areas to the public
 - Investigate the option of working with private landowner to designate area as an off-road motorcycling facility

Pellings LLP highlight Cray Wanderers FC Sports Village proposal for a new stadium with integrated leisure, community and commercial facilities on land off Sandy Lane, which would:

- Encourage participation in health and leisure pursuits in the area which is noted as suffering from poorer health than the Borough and London average.
- Support life opportunities for children and families and divert young people from anti-social behaviour, addressing the need for facilities for young people and children identified in the issues document with a range of events and training facilities.
- Provide a range of accommodation for use by the local community to increase opportunities for recreation and leisure.
- Include recreational and leisure facilities for individuals and local clubs/teams

Numerous comments suggest that the glossary should include community facilities for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. It should also include policing and refer to museums, art galleries, theatres and places of worship or a separate description could be included for the term "Cultural and Social Facilities". This could include the pursuit of leisure, recreation, sport, arts, music activities and a range of uses that add greater diversity to the cultural scene, such as concert and theatre venues; artists' studios; street events; public art; community music and dance venues; galleries, and facilities for film and digital media.

Getting Around – Transport and Accessibility

Number of comments = 28

Comments suggested that the Core Strategy should direct new development in the first instance towards sustainably located sites that fall within an existing defined centre. When new developments are located close to the main transport links, it will help to reduce car reliance and therefore road congestion and parking problems. It was argued that Bromley should therefore support higher density schemes which are located within walking distance to train stations with direct links to London. The setting up of park and ride schemes was suggested to encourage more use of High Streets which are often short of parking.

The Highways Agency was concerned about any potential impact of developments on the operation of the M25, in particular junctions 3 to 5. These junctions experience high levels of congestion particularly during peak periods. There would be concern if any material increase in traffic were to occur on these sections of the Strategic Road Network as result of development in the Borough without careful consideration of mitigation measures. It was noted that it is important that the Core Strategy provides a robust planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

Adequate car parking arrangements were seen as important in giving people flexibility and choice in their lives. However, it was acknowledged cars place further strain on local traffic congestion. It was suggested that car clubs in combination with good public transport options should help the higher density town centre flatted developments that will undoubtedly come on stream.

Comments were received about policies to encourage companies such as Streetcar to set up in Bromley. In the residential areas around Bromley North, Sundridge Park, Bromley South and Bickley, the majority of individuals use trains to get to work, but want a car for the weekends. With the high cost of car ownership and difficulties with parking, many would find this a better alternative than owning a car which isn't used on a daily basis.

The GLA noted the maximum car parking standards for new residential developments have recently been abolished. However, they noted that TfL would still expect all new developments to be in compliance with the maximum parking standards as set out in the recently adopted London Plan.

The Met Police recommended that the parking requirement for specialised land uses be assessed on an individual basis, having regard to meeting operational need (as supported by the London Plan, 2011) which seeks to ensure that the provision for parking at ambulance, fire and policing facilities will be assessed on their own merit. It was recommended the 'Getting Around' chapter of the emerging Core Strategy should therefore include the following wording:

'Car parking provision for emergency services including policing facilities will be determined by operational need and on a case by case basis, recognising that flexibility from the prescribed standards is required.'

English Heritage highlighted their support for sustainable transport and measures to reduce the need to travel by car, due to the benefits this can have for the historic environment. Support was given for investment into the public realm to encourage and facilitate access and enjoyment of the historic environment.

It was noted that improving accessibility to key economic areas of the Borough is essential to meet changing demands. Comments argued that opportunities should be taken through redevelopment and regeneration to ensure sustainable accessibility to key employment and retailing areas, enhanced design and sustainable design and construction.

It was noted that Bromley South does not have any disabled or pushchair access. Also neither does the Bromley North/Sundridge park line, (although Bromley North has disabled access, Sundridge Park does not) there is no ramp or lift access at Grove Park to the other platforms to enable you to get trains to London/Orpington.

Comments were received about the need for a direct line train service to London from Bromley North station. The current change at Grove Park adds 10-20mins to the commute each way. It was suggested that people end up driving to Elmstead Woods or simply choose to live in Beckenham or Orpington in order to have a quicker commute.

The issue of the provision of a network of accessible toilets and in particular "Changing Places" facilities in town centres was raised. It was felt such facilities would encourage people with disabilities to come to the Borough. It was also raised that attention be drawn to the employees and shoppers with disabilities who are less mobile, thus relying on accessible key transport hubs to get around the Borough.

There was concern that the transport infrastructure cannot cope with additional infill housing which in turn puts public transport under considerable pressure and increases car use. Issues were raised that public transport in the Borough is relatively poor in comparison to other London Boroughs since we do not have the tube, DLR or frequency of trains of other areas. Also raised was the issue of the geographical closeness of places such as Canary Wharf, Greenwich and the Olympics site; however this contrasts with the difficulty in reaching these places via public transport.

Several comments highlighted a required expansion of the tube network, a DLR extension, tram extension to Bromley South and further to facilitate east-west commuting and to Biggin Hill.

Comments suggested the need for further pedestrianisation in the retail areas of the Borough, combined with improved bus (and tram) services and better provision for cyclists. There were concerns that public transport needs to be seen as a cheaper and more comfortable option than the private car. Encouraging cycling in the Borough was also raised.

Comments suggested the introduction of local congestion charging to encourage and subsidise the take-up of public transport. 'Inappropriate' car use could be reduced by progressive road pricing and increasing restrictive parking to stop short journey commuter parkers. Also proposed was double yellow lining a mile around each school to encourage walking to school and to reduce the twice daily school traffic congestion.

It was suggested that 'express' bus services during peak times to major areas of employment and transport hubs could be introduced. For example the 119 is the main form of public transport from Bromley to Croydon - it takes 1 hr in the morning. However half the route from Shirley onwards is served by many other bus routes, therefore why not make it fast from Shirley to East Croydon to link up with the tram,

and train stations. A similar approach could be used for services from Biggin Hill to Bromley, between Bromley and Beckenham Junction, Bromley Common to Orpington etc. It doesn't have to be all buses on that route during the rush hours - but every other bus.

Ensuring the very long bus routes to big areas of employment/transport hubs have express services during peak periods would make a noticeable improvement for commuters, shoppers and other road users. It was noted that the very local bus routes e.g. R buses in Orpington, and hoppers in other parts of the Borough such as the 162, 226, and 367 that go on the minor roads and smaller towns and villages are vital for connectivity.

It was raised that there are enhancements needed to the bus terminus at Crystal Palace Parade, together with the suburban and overground station at Crystal Palace, including public conveniences and step-free access to the station. It was also raised that the potential for a tram service to link the Crystal Palace bus terminus and train station should be identified as a longer-term objective.

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

Our Valued Environments – Natural and Man-made

No of comments = 44

Man-Made Environments

The existing policies for the built environment and the individual characteristics of the areas of special residential character need to be maintained or carried forward from the UDP.

Development Management should

- Make every effort to develop Brown field sites and to recover the vast numbers of empty properties that are in existence.
- Develop a character / urban design study of the Borough to ensure that proposals reflect the character of those areas we seek to protect and identify areas where tall buildings would / would not be appropriate. (Need to consider what is considered 'tall' in the Bromley Context).
- Produce Supplementary Planning Documents (including conservation area appraisals). The Hayes Triangle is specifically highlighted as are viewpoints (Watts Lane noted).
- Include a Borough-wide heritage strategy and policies to ensure that heritage assets and their settings are conserved and enhanced (in line with PPS5) and a robust, publicly accessible evidence base
- Incorporating Green Infrastructure into development opportunities can provide support to this area, promoting a holistic approach together with energy usage and sustainable construction.
- Incorporate minimum space standards that generally conform with those set out in the London Plan
- Avoid prescriptive private amenity space standards (other than in conformity with the Mayor's Standards), developments to provide specific value instead of generic "open spaces" contributions in their s106 SPD. Eg enhancing private woodland amenity space (tower blocks on the Mountfield estate),
- The GLA reiterate the requirement for all new housing to meet 'Lifetime homes' standards with 10% designed to be wheelchair accessible.
- Ensure that any infringements to planning laws/planning applications are dealt with promptly and fairly.

Public Realm – it is important to ensure that our town centres/local shopping parades are inviting, well maintained and are considered safe. Importantly:

- Good public transport and car parking facilities,
- High Streets not too long for walking / policy solutions for "poorer ends".
- Deliver cycle friendly routes.

Chelsfield Park seek resolution to their long standing request for an Area of Special Residential Character.

Natural Environment

Green Infrastructure - Natural England and others note the contribution that the natural landscape and Green Infrastructure make to the quality-of-life and health of Borough residents by providing mental respite and breathing space within largely urban areas. Comments highlight:

- the contribution of the natural signature (underlying landscape) of the Borough to local distinctiveness and the guidance within the “London Landscape Framework”.
- that 6 regionally important geological and geomorphologic sites are located in the Borough requiring management and the promotion of public access
- plans should treat the open space network as part of an integrated system to which improvements are encouraged. Work with the third and private sectors on the Rights of Way Implementation Plan is highlighted.
- Pressures on resources across Borough boundaries supporting joint work.
- Schools can be developed to provide sporting resources without a major impact on the green spaces (Charles Darwin School sited as an example)

Water – The Environment Agency note that a clear link needs to be made to other plans and strategies e.g. River Basin Management Plans and, particularly given Bromley’s high reliance on its groundwater resources, the Water Framework Directive, as they may impact on future development and vice versa. This includes impacts beyond their Local Authority boundary. The broad objectives of these plans should be incorporated in the Core Strategy to meet Local Authorities general responsibility not to compromise compliance with EC Directives.

Green Belt - comments suggest that the use of Green Belt land should remain protected at all cost to prevent deterioration and change in character. Other comments suggest that in order to protect the areas of natural heritage a formal review of Green Belt boundaries be carried out. Land which does not meet the PPG2 criteria for inclusion should be developed for alternative uses of all types, ensuring that the pressure for development is reduced on other Green Belt land.

Comments suggested

- release for housing
- a presumption in favour of the reuse of Green Belt land for sustainable development which serves the community / enabling development

Housing - the basis of the proposed quantum of growth is questioned and it is suggested that too much weight is attached to the “protection of the environment” rather than the delivery of much needed housing. The need to assess all potential scenarios is highlighted. This current approach has not provided certainty of sufficient delivery. As such, the plan should seek to explore “reasonable alternatives” to ensure suitable “flexibility”, including a contingency for an alternative approach to delivery that assesses housing in the Metropolitan Open Land or Green Belt to meet the need. Specific reference made to the release of Keston Garden Centre from Green Belt to meet housing need.

Other uses (either release or retained within the Green Belt but justified by “very special circumstances”)

- Pellings LLP, for Cray Wanderers FC suggest that proposals for a “Sports Village” including new stadium, leisure, community and commercial facilities in St Paul’s Cray, represents a unique opportunity for the Club to assist with the regeneration of a deprived part of the Borough, with environmental enhancements to minimise the impact on the Green Belt, character and ecological interests of the open space.
- Gypsy & Travellers - Comments highlight the need for additional pitches to protect the environment through the prevention / resistance of unauthorised incursions. Delivered through:
 - the expansion of existing sites
 - allowing existing temporary pitches to become permanent

- allocation of new sites (on Green Belt if no other land is available)
- ensure that any sites already benefitting from permission for caravans are protected for future use by caravans.

Comments also suggested a relaxed view of "very special circumstances" be taken for enabling developments which benefit the community, specifically, the diversification of farm land / market gardeners should be viewed sympathetically having the potential to improve the economic well being of the rural community and minimise hauls to supermarkets. (Watts Farm highlighted)

Working in Bromley – The Local Economy and Town Centres

Number of comments = 32

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

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

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

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

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

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

The Metropolitan Police were concerned about the provision of patrol bases, custody centres and relevant pan-London policing facilities that are an essential part of effective borough-based policing. The nature of these uses are similar to that carried out on most employment sites and are therefore suited to employment sites and similar locations. Whilst falling outside the 'B' Use Class definition, these policing uses are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they

possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas.

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

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

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

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

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

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

It was suggested that the Council facilitate the creation a business park, however, it was noted that the road network around Biggin Hill severely limits the potential scale of any development. Development of the road/train/tram infrastructure, together with further carefully planned residential housing needs to be coordinated with the 'Strategic Outer London Development Centre' aspirations.

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

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

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

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

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

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

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

The implication that only A1 uses are appropriate derives from very outmoded and discredited thinking that other uses such as banks detract from the vitality and viability of town centres. In the view of the Bank, the Core Strategy must consider the issue of the Council's outmoded approach to A2 uses in town centres. Critical of the lack of a review of the Council's out-of-date policies for primary shopping frontages and the lack of any evidence to continue with them. It was suggested UDP policies such as S1, S2 and S3 are reviewed as they are neither consistent with National Policy nor justified.

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

Environmental Considerations

No of comments = 33

Sustainable Design and Construction

Comments on the concept of local standards for sustainable design and construction and renewable energy were mixed, with suggestions that there should be none, some or just those that already exist in the London Plan. Some considered higher standards are needed, whilst others felt that standards are not viable in all cases and that there should be flexibility to ensure that overly stringent regulations do not constrain developments coming forward. Another considered the standards unhelpful, producing very little return and playing on fears.

The GLA comments that the Core Strategy should take advantage of the policies in the London Plan to note any locally specific potential to minimise CO2 reductions and for local energy generation to minimise CO2 emissions across the Borough. Responses to local standards were mixed but generally there was a resistance to local standards.

With regard to sustainable design standards comments were received regarding

- viability linked to the new 'affordable rent' tenure, raised by Registered Providers, who also flagged the HCA requirement for statements on design.
- that it would be more sustainable for fewer flats and more houses to be built (disability group)
- the need for green landscaping, specifically green links between parks and linking with town centres as well as tree lined streets as well as green transport routes and play / community areas.

Renewable Energy Technology

A number of representations raise concerns about the potential visual impact of renewable energy technology (solar panels and wind turbines), with regard to areas with notable character and on historic buildings.

- English Heritage suggests policies consider the potential problems with retrofitting energy equipment on historic buildings.
- A couple more representations relate to areas of special residential character and conservation areas where it was suggested that other forms of air/ground source heat pumps should be mandated.

Other comments in respect or renewable energy technology refer to

- The potential for park lighting to be solar powered
- the required inclusion of electric vehicle charging points at new developments in accordance with the standards set out in the London Plan (GLA)

Waste management

Waste management was raised as an area where the Borough needs to show a firm commitment, with the GLA commenting that the current evidence base (a technical paper) is not in conformity with the London Plan. Southwark highlight that one of their sites in the paper is not currently in operation. To achieve conformity the GLA advises that the Core Strategy should

- include a commitment to safeguard all existing waste sites.
- state that if any waste site is lost, additional compensatory land with equal or greater throughput will be provided.

- confirm the allocated waste apportionment over the lifetime of the strategy and how it will be met during this timespan.
- reference the Mayor's recycling and composting targets for both Municipal and Construction, Demolition and Excavation (CD&E) waste.

Additionally the GLA suggests that Bromley may wish to require all new developments have sufficient waste and recycling storage facilities, support the development of management facilities that have positive carbon outcome and ensure that developments adjacent to waste sites will be designed to minimise conflicts of use.

Surrey County Council point out that Bromley have been exporting waste to their area and that they are keen to see Bromley

- increase its self-sufficiency in dealing with waste.
- will need to devise estimates for all major waste streams including municipal waste (MSW), commercial and industrial (C&I) waste and construction and demolition (C&D) waste.
- allocate sites for the management of that waste, either unilaterally or in partnership with other South East London Boroughs. Also supported by the Environment Agency who highlight the importance of "Resource Management" suggesting that the identification of employment land adjacent to, or close to, existing and proposed waste management facilities could form the basis of a resource recovery park.
- help reducing London's reliance on mineral imports (aggregates from Surrey) by promoting sustainable construction and requiring a proportion of recycled aggregate to be used in new development. (Also supported by the Environment Agency)

The Environment Agency also suggests that the borough:

- includes advice on designing out waste in any guidance on the design and layout of all forms of development
- promote a better understanding of waste management options that protect the environment and human health,
- improve resource efficiency and help reduce greenhouse gas emissions
- develop a "whole life" approach to tackling "high impact" waste streams

A comment was also received suggesting incentivising the use of recycling facilities for residents (eg with vouchers for local shops)

Groundwater protection, flood risk management and water conservation

The Environment Agency highlight groundwater protection, flood risk management and water conservation as key areas for policy development requiring prioritised environmental outcomes jointly agreed and delivered with local authorities and partnerships. They note Bromley's role as the Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 and in respect of integrating this into the development process advise as follows:

- All planning applications and pre-development enquiries should be assessed in terms of local flood risk and this issue should be incorporated into the planning application form.
- Development should incorporate "green infrastructure" that provides for multi-functional uses in new and existing developments
- Recognising the role of wetlands, forestry and ponds in regulating the water cycle and flood management,

- Explore any efforts to enhance biodiversity through water management in accordance with PPS9.
- Address the responsibility for consenting on ordinary watercourses on planning application forms and through the pre-application process.

A local representation suggests that consultants should be appointed to support Bromley as the lead local flood authority, coordinating past catchment studies, accepting river corridors as flood zones and developing policy.

The EA comment that developments should be sustainable both now and in the future, adaptable to society's changing needs and demands they suggest that

- new development and regeneration sites should have plans in place to address their Environmental impacts.
- construction standards be applied which significantly exceed building regulations to embed sustainable design in new buildings (e.g. high insulation levels, passive cooling techniques, to comply with the highest level of the Code for Sustainable Homes
- Commitment is made to building "communities" and providing social and community infrastructure

Ground water protection

The Environment Agency comment that the plan should promote sustainable water management practices, e.g. recognise the role of wetlands, forestry and ponds in regulating the water cycle and flood management. The EA note that SUDS (in particular infiltration SUDS) are not suitable in all circumstances and should only be used where there is no risk of discharges to ground which would pose an unacceptable risk to controlled waters.

The GLA comment that the Borough may wish to

- identify waste water treatment capacity requirements to meet any proposed growth
- identify locally specific/suitable measures to improve the water environment on the basis the Thames River Basin Management Plan (Annex C) with assistance from the local EA office

Flood risk management

The Environment Agency highlight that there are 9,000 properties at risk of flooding in Bromley and any new development should not cause this number to rise. It was felt that the potential problems of flooding had been "played down" in the Issues document. They comment that PPS25's Key Planning Objectives should be reflected in policies and that

- the sequential test, should be correctly applied steering new development to the lowest risk flood zone appropriate to the proposed use, and
- A flood risk assessment should demonstrate that the development and its occupants/users will be safe for the lifetime of the development, that the development does not increase flood risk elsewhere and seeks to reduce risk overall
- Given that some existing development may not be sustainable in the long-term, use regeneration to help relocate existing development to lower risk locations

They comment that no inappropriate developments should be located in areas at risk of flooding and more households and businesses should be better protected from flooding from all sources, particularly in disadvantaged communities.

The GLA point to the policy steer in the Environment Agency “Thames Catchment Flood Management Plan” specifically

- Applying the drainage hierarchy in the London Plan locally, and
- considering the relevant Drain London outputs

Reducing water consumption

Comments note the limited contribution of development control process to reducing water consumption in limited and the GLA suggest a policy approach would be appropriate. The Environment Agency note that all abstractors and users of water must be encouraged to ensure they reduce their water consumption to manage demand and share water in the most efficient way. They comment that development should not be provided

- where it would lead to a deterioration of in the quality, quantity, or natural flow of underground, surface and waters
- where adequate water resources do not already exist, or where their provision is likely to cause risk to existing abstractions, water quality, fisheries, nature conservation, amenity, or inland navigation interests or any facet of the water environment

Other representations suggest

- Rainwater harvesting and grey water harvesting be required in all new developments where practicable

Beyond the Borough Boundary

Number of comments = 8

A key issue raised was that many disabled people in the Borough have to use swimming baths in Greenwich as they have platform lifts suitable for wheelchair users with multiple disabilities. Additionally, people with learning disabilities use arts and adult education facilities in Bexley, primarily because they are accessible. Addressing access issues is important to people with disabilities, rather than just “reasonable adjustment”.

Disability Voice Bromley also noted that if there is sufficient suitable housing, people with disabilities will be able to access services and shops more easily and become increasingly active members of the community.

A South East London wide approach was welcomed, if it avoided duplication, but infrastructure issues like transport, including Dial-a-ride need to be factored in. Many charitable organisations already work across borough boundaries.

There is an opportunity to ensure that the historic environment is used positively and pro-actively in areas of regeneration to be a catalyst for successful regeneration and high quality design. We welcome area-specific policies which support this.

It was suggested that a London wide plan for a network of traveller sites would alleviate the short stay groups and the resulting tensions that frequently arrive. There were concerns that Bromley Council could try and be more positive when dealing with the long term plans for Gypsy Travellers.

Crystal Palace

The Crystal Palace Triangle Planning Group made extensive comments. The Group commented that the Council should work closely with adjoining boroughs to make sure that all sides of the Crystal Palace Triangle are vibrant. Crystal Palace town centre has benefited in the past from council initiatives, including the provision of a Town Centre Manager funded through Croydon Enterprise and dedicated to this one centre. We look to the restoration of a dedicated Town Centre Manager for Crystal Palace funded by the three adjoining boroughs.

The Triangle is heavily congested with traffic at peak times. The one-way system has improved traffic flow overall but traffic speeds through the Triangle, adding to pedestrian danger and contributing to the closure of shops and cafés dependent on passing trade that were already under economic pressure. The one-way system should be reviewed and further traffic calming measures and safe crossing points are needed.

The opportunities and challenges of coordinating plans and the provision of facilities and services shared across borough boundaries are self-evident. Schools and learning places, health facilities and places for the community to meet and use should be grouped together and within easily reachable places. Enhanced provision of community facilities for young people could be created through the co-location/sharing of any facilities provided to meet future demands for educational places. There may also be opportunities to provide healthcare facilities within close proximity.

The bulk of Upper Norwood is in LB Croydon, but five London boroughs have a stake in this broader area, affecting five Mayoral sub regions. The area is made distinctive not only by Crystal Palace Park, but by the Crystal Palace Triangle district centre. Bromley's stake in Crystal Palace is essentially the "Triangle" stretch of Church Road and the Park. Collaboration with other Local Authorities across the area is essential, if Upper Norwood is not to remain at the edge of everyone's peripheral vision. Crystal Palace will require a neighbourhood plan prepared in collaboration with Croydon and Lambeth Councils in association with Southwark and Lewisham, and endorsed by the GLA. The Triangle Planning Group will be happy to provide local input to this process.

Supplementary Planning Guidance should be prepared for the whole district centre in collaboration with Croydon and Lambeth, to advise developers and assist the control of development. Planning decisions in any part of the centre or in the Park have wider implications, and must not be taken in isolation by one borough Council acting alone.

The five boroughs and the GLA acting together should take a comprehensive view of the planning needs of the entire Upper Norwood area. The Crystal Palace Triangle Planning Group are willing to work with the Chief Planners of each borough to achieve a coordinated plan that draws on the local knowledge of the traders and residents and the technical expertise of the borough Councils.