

## **Bromley's Valued Environments – Working Draft**

### **Introduction**

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

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

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

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

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

### **National Planning Policy Framework (NPPF) and the London Plan**

## **Open and Natural Space**

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

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

## **Built heritage**

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

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

## **Visions, Objectives and Strategic Policy Options**

### **Open and Natural Space**

#### **Vision:**

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

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

**Objectives:**

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

**Strategic Policy Options:**

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Built heritage**

### **Vision:**

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

### **Objectives:**

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

## **Strategic Policy Options:**

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

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

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

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

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

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

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

## **Development Management Policies**

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

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

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