

Introduction and Background

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

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

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

Policy Options

Vision

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

Objectives

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

National and London Plan Policies

The National Planning Policy Framework (NPPF)

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

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

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

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

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

London Plan

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

Policy 2.6 Outer London: Vision and strategy

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

Policy 2.7 Outer London: Economy

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

Policy 2.16 Strategic Outer London Development Centres

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

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

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

Strategic Industrial Locations and other Industrial Provision

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

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

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

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

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

Strategic Industrial Locations in Bromley

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

Policy 4.4 Managing Industrial Land and Premises

The Mayor will work with boroughs and other partners to:

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

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

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

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

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

LB Bromley Core Strategy Issues Document (2011)

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

Strategic Policy Options

Business, Employment and the Local Economy

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

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

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

Options:

(1) Strategic Industrial Locations (SIL)

Option 1A - PREFERRED

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

(2) Business Areas Designations

Option 2A - PREFERRED

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

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

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

Option 2B

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

(3) Development Outside Business Areas

Option 3A

Maintain the policy approach as per UDP policy EMP5:

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

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

Option 3B - PREFERRED

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

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

Option 3C

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

(4) Future Requirements for Office Floorspace

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

Option 4A - PREFERRED

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

Option 4B

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

Option 4C

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

Option 4D - PREFERRED

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

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

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

Option 5A - PREFERRED

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

Option 5B

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

Option 5C - PREFERRED

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

Option 5D - PREFERRED

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

Option 5E

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

Development Management Policies

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

Offices:

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

Development outside Business Areas:

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

Small Businesses:

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

London Plan (2011)

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

Policy 2.17 Strategic Industrial Locations

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

Policy 4.3 Mixed Use Development and Offices

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

Policy 4.4 Managing Industrial Land and Premises

- Protection and management of industrial land.

Policy 4.12 Improving Opportunities for all

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

Town Centres – Working Draft

Introduction

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

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

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

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

Policy Options

Vision

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

Objectives

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

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

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

Encourage safe town centres and a prosperous evening economy.

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

National and London Plan Policies

The National Planning Policy Framework (NPPF)

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

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

London Plan

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

Policy 2.15

Town Centres

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

Policy 4.7
Retail & Town Centre Development

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

Policy 4.8
Supporting a Successful & Diverse Retail Sector

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

Policy 4.9
Small Shops

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

Current Saved UDP Policies:-

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

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

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

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

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

- BTC4: New retail facilities

LB Bromley Local Plan Issues Document 2011

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

Options:

1. How to ensure Bromley Town Centre remains competitive

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX 1

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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