

<p><u>BROMLEY LOCAL PLAN</u></p> <p>Options and Preferred Strategy</p>
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Introduction

Bromley is in the process of developing a new style 'Local Plan' for Bromley, which will set out the vision and objectives for the Borough for the next 15- 20 years and the planning policies to support their delivery. This together with the London Plan (July 2011) will form the Development Plan for the Borough.

This document forms the Options and Preferred Strategy stage in the preparation of the Local Plan. It builds on earlier work that residents, businesses and partner agencies have contributed to, in particular, through the Core Strategy Issues Document in Summer 2011.

The purpose is to provide local residents, businesses and the wider community and partners with the opportunity to participate in the plan making process and make their views on the vision, objectives and strategic options known to the Council.

The Bromley Local Plan will meet the requirements of the Planning and Compulsory Purchase Act 2004 (amended) and be in line with the new National Planning Policy Framework published in March 2012.

Background

The Council had previously been progressing its Local Development Framework (LDF), a series of documents, including several adopted documents; (Bromley Town Centre Area Action Plan and Supplementary Planning Documents for Planning Obligations and Affordable Housing).

In Summer 2011 the Council undertook public consultation on its Core Strategy Issues Document as the first formal stage of preparing the, then, Core Strategy (the overarching policy document within the LDF). However, the Government introduced its new National Planning Policy Framework and a new system of 'Local Plans' replacing the Local Development Frameworks in 2012.

The Council decided to move to a Local Plan to meet the new guidance and ensure that the work undertaken for the Core Strategy and LDF is incorporated within the Local Plan preparation. This work including the evidence base and the response to the public consultation has been central to developing this consultation document, and will continue to inform the Local Plan process.

The Local Plan will set out the vision and objectives for the Borough in 2030 and the strategic and more detailed policies used in determining local planning applications together with a proposals map and specific site proposals.

In the meantime the majority of the policies within the adopted UDP (July 2006) are 'saved' and form part of Bromley's Development Plan.

Options and Preferred Strategy Phase

The Options and Preferred Strategy is an important stage of the Local Plan process and as outline above builds on the earlier LDF, and in particular the Core Strategy preparatory work. The Core Strategy Issues Document set out a vision and objectives for the Borough in 2030. This current document refines these in light of the consultation response from residents and the wider community, ongoing research and technical evidence base and changes in Government and London wide guidance.

The Council has considered different options for the future development of the Borough. This document clearly identifies 'preferred options' which the Council considers will contribute to the delivery of the vision and objectives for the Borough. Other options, where there are considered to be reasonable alternatives are included.

Consultation process

Consultation on the Options and Preferred Strategy is primarily through the Council's website. Awareness of the consultation is being promoted through residents associations, community groups, emails to those on the planning department's database, flyers and posters and directing people to the website to respond on-line. This has several benefits, it is often easier for people to move between different sections of large documents on-line and links to related sections can be included. It is also a cost effective way for the Council to reach a large number of residents, businesses, and partner agencies and to be able to analyse their responses.

Copies of the document are available in public libraries, at Community House, and the Cotmandene and Mottingham Outreach centres. If you, or someone you know requires a copy of the document in another format please contact the Local Plan team.

The on-line consultation will continue for 6 weeks.

Next Steps

The responses to this document will be reported to the Council's Development Control Committee and help form the next stage of the Local Plan process. Along side this consultation and taking into account the responses the Site Allocations, Proposals Map and detailed development management/control policies will be developed and subject to another phase of consultation.

There will be a final formal period of public consultation prior to the Council submitting the draft Local Plan to the Secretary of State, in advance of an

Examination in Public. An Inspector at the EiP will consider the plan in its entirety. The draft Local Plan will include the Vision and objectives for the borough, the strategic approach together with detailed planning policies and a proposals map showing the proposed site allocations and designations.

Structure of this document

The next section sets out the Vision and Objectives for the borough to 2030. These have been developed from Bromley 2020, the Community Strategy for the Borough and the Core Strategy Issues Document included an earlier version.

This is followed by six thematic chapters, which focus on key elements , Living in Bromley, Supporting Communities, Getting around the borough, Valued Environments, Working in Bromley and Environmental Challenges. .

Throughout these sections your views are sought on whether you agree with the vision and objectives and whether you consider that the preferred options identified will contribute to the delivery of these over the plan period of 15 years.

Consultation and Making Your Views Known

This is a consultation document, inviting the view of residents, local businesses, community and voluntary sector organisations, service providers and statutory partners such as the Metropolitan police, the health sector, English Nature and the Environment Agency and English Heritage.

You may already have been involved in the Core Strategy and wider LDF preparation process and if you are already on the Planning Department's emailing list you will automatically be kept informed of consultation dates and progress in the plan-making process. If you have internet access using the consultation on-line portal is the quickest and easiest way to be kept up to date and to make your views known.

If you don't have internet access then if we have your details we can send you out information letting you know where you can view documents. For this consultation copies can be viewed in all Bromley libraries, the Cotmandene and Mottingham Community and Learning Shops and at Bromley Civic Centre. Information on consultation timescales and progress of the Local Plan will be publicised in libraries and on the Council's website www.bromley.gov.uk.

This isn't the only opportunity to be involved in the Local Plan but it is an important stage of the process and we encourage as many people living, working or involved in the Borough to respond.

Online consultation portal xxxxxxxxxxxxxxx

Email yyyyyyyyyyy

Postal address

Aaaaa

Please send your comments by xxxxxx

If you need the document in a particular language or format, please let us know.

Bromley in 2030

“Bromley is known for the high quality of its living, working and natural environments. The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives.

Bromley values its distinctive neighbourhoods, ranging from the rural to suburban and urban. Neighbourhoods provide a choice of good quality homes, jobs and a range of shops and services appropriate to the different town, district and local centres. Bromley Town Centre is recognised for its cultural and leisure facilities and vibrant high quality shopping experience.

The protection and enhancement of conservation areas and historic assets such as Downe House, Crystal Palace and Biggin Hill, along with high quality new development have contributed to civic pride and wellbeing.

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

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

Open Space and the Natural Environment

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.

Health and Wellbeing

The quality of life in Bromley has improved in all its neighbourhoods with all residents enjoying better health and wellbeing. Areas with a concentration of social and/or environmental difficulties are being improved. Communities are served by local shopping parades, education, healthcare, leisure, community and cultural facilities, including libraries and places of worship. New facilities are encouraged in accessible locations to deliver flexible and efficient community hubs. The environment is designed to maximise accessibility for people with disabilities. Residents are helped to improve their own places and local environments for the benefit of all the community. There is less crime and anti-social behaviour.

Objectives: Produce healthier environments and infrastructure to support people in living fuller, longer, healthier, more sustainable lives.

Co-ordinate the improvement of Bromley's designated Renewal Areas, and other areas with environmental difficulties, to reduce health inequalities; and encourage all communities to improve their own environments.

Neighbourhoods offer good quality homes and an accessible range of shops and services, appropriate to the roles of the different centres - from town centres to local neighbourhood centres and parades.

Ensure new community facilities are appropriately located to provide accessible effective modern services, and resist the net loss of facilities

Homes

A range of decent homes of different types and sizes are available and housing supply is tailored to local needs. Any new housing complements and respects the character of neighbourhood in which it is located, paying particular attention to the

density of development, parking requirements and improving the choice of accommodation available.

Objectives: Ensure there is an appropriate supply of homes to meet the varied needs of the local population, which responds to changing demographics, in particular as the population ages.

Ensure new residential development and conversions complement and respect local character.

Ensure new homes are designed to minimise environmental impact and are supported by appropriate social and environmental infrastructure.

Business, employment and the local economy

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 are an appropriate supply of commercial land and a range of flexible quality business premises across 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

Support the SOLDC designation at Biggin Hill to enhance the areas employment and business opportunities, whilst having regard to the accessibility and environmental constraints.

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 town centres, 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.

Design and the public realm

New development of all kinds is well designed, safe, energy efficient and complements its surroundings, respecting the existing scale and layout. Private or public open space, and appropriate car parking are key considerations. Public art and street furniture make places more attractive and comfortable for users. Our roads and streets are clean but uncluttered, with street trees and verges improving their appearance.

Objective: Ensure development attains high quality design standards.

Ensure development includes appropriate well planned private or public open space.

Ensure public areas are well designed, safe and accessible.

Built heritage

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” and underused heritage assets are brought back into productive uses. The Borough’s rich heritage is widely enjoyed.

Objective: 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 protection and improvement of heritage assets to contribute to strategic, local planning and economic objectives.

Transport

Moving around the borough is easier due to reduced road congestion and improved public transport networks. Commuting traffic has reduced as more people share car journeys and choose alternative ways of working and travelling. Reduced road traffic results in less pollution and greenhouse gases from transportation. Any new development should where appropriate include electric vehicle charging points and there are more car clubs, increasing travel choices for local people. Walking and cycling to work, school and for leisure, has increased and the road environment is

safer for vulnerable users. Public transport is more accessible to those with mobility problems and is safer and more reliable.

Objectives: Reduce road congestion at peak times through better management of the network and encouraging patterns of development that reduce the need to travel.

Supporting improvements to public transport links and facilitate environments that encourage walking and cycling.

Locate major developments where they can maximise the use of public transport.

Ensure new developments include electric charging points, cycling facilities and car clubs where appropriate.

Ensure streets are safe, accessible and uncluttered, improve road safety and reduce air and noise pollution from traffic.

Environmental challenges

New development is designed in such a way as to not only enhance the character of the area but also to ensure it does not worsen any environmental problems. Buildings are resource efficient, using less energy, producing less carbon and conserving water. Opportunities for appropriate low carbon, decentralised energy networks and renewable energy are considered and flood risk is reduced. Less waste is produced and more is managed and disposed of locally through new cleaner technologies. Pollution control prioritises key local problems and new development helps bring contaminated land back into use.

Objectives: Reduce environmental impacts and the use of precious resources in the design and construction of new development.

Support the development of local energy networks and low-carbon and renewable energy generation.

Improve the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised.

Reduce the amount of waste that ends up in landfill, particularly biodegradable waste, and increase self-sufficiency.

Reduce air pollution and minimise problems of noise and light pollution. Ensure contaminated land can be remediated where possible.

LIVING IN BROMLEY

Housing

Introduction

The London Borough of Bromley is the largest borough in London with an area of 15,014 hectares, half of which is designated as Green Belt. Bromley's distinctive character arises from its protected open space: countryside, parks, gardens, playing fields, and woodlands spread throughout the Borough. These existing open space designations restrict the number of large sites which can come forward for housing. The Borough's housing target is therefore very much capacity led having regard to the existing land designations and policy constraints.

Context (National and London Plan Policies)

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) requires Local Authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

The NPPF sets out that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

London Plan

The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford (LP Policy 3.3).

The London Plan has been informed by both the London-wide Strategic Housing Market Assessment (SHMA) and the London-wide Strategic Housing Land Availability Assessment (SHLAA) and makes reference to the annual requirement for housing in London¹ which is greater than the total minimum housing provision target². Boroughs should seek to achieve and exceed the relevant minimum borough annual average target.

LP Policy 3.4 of the London Plan seeks to optimise housing output taking account of local context and character, design principles and public transport capacity. Importantly LP Policy 3.5 states that housing developments should be of the highest quality internally and externally and in relation to their context and to the wider environment taking into account the strategic policies in the London Plan to protect and enhance London's residential environment and the attractiveness as a place to live.

LP Policy 3.8 states that account should be taken of the changing age and structure of London's population and in particular, the varied needs of older Londoners, including for supported and affordable provision. It also requires that all new housing is built to 'Lifetime Homes' standards and that ten percent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

Boroughs are required to set an overall target in their plans for the amount of affordable housing provision needed over the plan period in their areas and separate targets for social/affordable rented and intermediate housing. Boroughs should also reflect the strategic priority accorded to the provision of affordable housing. The London Plan states that affordable housing targets may be expressed in absolute or percentage terms.

The London Plan states that it is expected that new development in London will seek to achieve the highest possible Code for Sustainable Homes Levels. The London Housing strategy outlines the minimum Code for Sustainable Homes levels required for publicly funded housing developments and sets out the requirement to meet Code Level 4 from 2011.

There are a series of SPGs (Supplementary Planning Guidance) which expand on the London Plan Policies. Importantly, a new housing SPG has recently been published (November 2012) and gives further guidance on housing supply, quality, choice, affordable housing, stock and investment, infrastructure and mixed use developments.

Local Issues and Evidence

There are a number of local issues which are of relevance to the Living in Bromley Chapter. Particularly important local issues include the retention of

¹ 34,900 dwellings as stated in the London-wide SHMA (2009)

² 32,210 dwellings as stated in the London-wide SHLAA (2009)

the valued local character, the ageing population within the Borough, and housing need and supply.

The issues consultation responses highlight the ageing population within the borough and also the importance of the borough's local character. Importantly, Building a Better Bromley 2020 Vision states that housing policy will reflect the changing needs of our residents, but we must ensure that the very special nature of the Borough is preserved.

A London-wide SHLAA which all London Boroughs took part in was carried out in 2009. The primary role of the SHLAA is to identify sites with potential for housing; consider their housing potential; and assess when they are likely to be developed. A SHLAA is an important evidence base for plan making. The evidence provided by the SHLAA has provided boroughs with their average annual housing provision monitoring targets 2011 – 2021. Bromley's current housing provision monitoring target in the London Plan is 500 units per annum.

The NPPF specifies Local Planning Authorities should have a clear understanding of housing needs in their area and prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs³. The SHMA should identify the scale and mix of housing and range of tenures that the local population is likely to need over the Plan period.

The South-East London sub region (Bromley, Bexley, Southwark, Lewisham and Greenwich) commissioned a SHMA (including individual borough housing requirements studies). The study demonstrates a high level of need across the sub region and highlights a number of key challenges and issues. Importantly within the sub region there is an estimated requirement for 10,450 additional market homes and a need for an extra 16,800 affordable homes over the next 5 years. It is anticipated that the housing requirements will change due to the Government's Welfare Reforms; however, it is too early to predict how the reforms will impact upon need.

An Affordable Housing Viability Assessment Update was carried out in 2012 to refresh a previous Assessment undertaken in 2009/10 and to help inform the development of the Council's affordable housing policies within the emerging Local Plan. The Update reviews the impact on development viability of varying thresholds, proportions and tenure mixes. It has reassessed the financial capacity of residential schemes in the Borough to deliver affordable housing without their viability being unduly affected or that of the Plan as a whole.

The Update recognises that viability variations are seen throughout the Borough driven by varying house prices. Despite this it is considered that a simple borough-wide approach to affordable housing provision should continue to be considered with variations relating to site size and not geography.

³ Paragraph 159 of the National Planning Policy Framework 2012

The Update specifies that the options need to be considered in relation to the viable advantages of applying them as well as any shortcomings that could result from applying them. Additionally, the affordable housing policy will need to incorporate flexibility when developers demonstrate viability issues that require discussions with the Council.

QUESTION SET 1

Strategic Policy Options

Housing Supply

The London Plan states that boroughs should seek to achieve and exceed the relevant minimum borough annual average target. Bromley's annual housing target as set out in the London Plan is 500 units per annum.

A review of the 2009 SHLAA (from which the Council's target of 500 units per annum has arisen) is currently taking place and could result in a more realistic long term target for the Council. The integrity of Bromley's Green Belt, Metropolitan Open Land, and, Urban Open Space, and size, bulk and design of residential buildings and garden land should be reflected in any assessment of the capacity of the Borough to accommodate further growth.

In anticipation of the SHLAA review the Council submitted a more realistic target in the region of 470 units per annum in response to the London Plan consultation having regard to the likely delivery of the SHLAA sites.

PREFERRED OPTION 1

Seek to deliver a realistic annual housing target of 470 homes.

The capacity of the Borough to accommodate further growth depends on local, regional and national policies regarding Green Belt, Metropolitan Open Land, Urban Open Space, size, bulk and design of residential buildings and garden land. If existing policies on these issues are continued, then it is estimated that there is scope for around 470 dwellings per annum to be built in the next ten years, a large proportion of which will be accommodated in Bromley Town Centre.

The Council has demonstrated that it can meet the current London Plan target of 500 dwellings per annum for the next five years⁴ however, this target is not considered achievable in the long term without impacting on local character.

The Council considers that a long term target in the region of 470 homes per annum in anticipation of the SHLAA review will reflect the availability of sites

⁴ LB Bromley five year supply paper – Five year supply of deliverable land for housing June 2012

and retain the local character and context, whilst maintaining the Green Belt. This approach is in accordance with national and regional policy and in line with the Council's evidence submitted to the London Plan EiP. It is considered a realistic long term target for the Borough.

OTHER OPTIONS CONSIDERED

OPTION 2

Seek to deliver the current London Plan annual target (currently 500 homes per annum)

The current London Plan target of 500 units per annum is based on a London-wide SHLAA. The Council's five year supply paper demonstrates that the Council can meet this target for the next five years until 2018. However, the Council considers that a long term target of 500 units per annum may not be achievable without impacting on the local character. The importance of retaining local character and protecting open space was highlighted in the Core Strategy Issues Document (July 2011). The forthcoming London-wide SHLAA review will need to have regard to the potential impact on local character whilst also assessing the deliverability of the sites.

OPTION 3

Seek to significantly exceed current London Plan target of 500 homes per annum.

Housing development in recent years has led to concerns about the changing character of the Borough's residential areas. Development planned for the next five years could average 500 units per annum, distributed across large allocated and 'windfall' sites in addition to small sites. A target in excess of the current London Plan target is likely to have an adverse impact on the character of the borough. Growth above the level the Council considers a realistic target will have additional unsustainable demands on existing infrastructure which in turn will require additional land to be allocated.

The provision of a significantly lower number of houses is not considered as an option as it would be contrary to regional and national policy.

QUESTION SET 3

Location

In accordance with the London Plan (Policy 3.3), Bromley is required to identify and seek to enable development capacity to be brought forward to meet the housing targets having regard to the potential to realise brownfield housing capacity through the spatial structure it provides including;

- Intensification
- Town centre renewal
- Opportunity and intensification areas and growth corridors

- Mixed use redevelopment
- Sensitive renewal of existing areas

The London-wide SHLAA recognises that in London, the housing market has little regard to borough boundaries and unlike the rest of the country, over 96% of housing comes from brownfield sources. A large proportion of new housing in Bromley is therefore built on existing brownfield sites. During the monitoring period 2010-2011 94% of new and converted dwellings were built on previously developed land⁵.

The options below identify the preferred locations for housing development within the borough.

The release of Green Belt land for housing is not considered as an option as it is contrary to regional and national policy⁶ which seek to protect the Green Belt from inappropriate development.

PREFERRED OPTION 4
Town centre first approach.

Town centres are considered the most accessible locations with good public transport and road networks. This approach which is supported by national and regional policy would assist in town centre renewal and would help to retain the character of the rest of the Borough. The Bromley Town Centre Area Action Plan demonstrates that Bromley Town Centre will be a major contributor in accommodating growth.

The intensification of areas outside of the town centre is not considered a sustainable option as it will have a detrimental impact on the character of the Borough.

QUESTION SET 2

PREFERRED OPTION 5
Existing brownfield sites & windfall sites at a density that respects local character.

As noted above this may result in some developments coming forward at densities lower than that as set out in the London Plan Density Matrix and some coming forward at higher densities.

The local suburban character of much of the Borough is highly valued. Following workshops and consultation as part of developing the issues for the Core Strategy and now the Local Plan, a character assessment was undertaken and has been used to inform the issues document.

⁵ London Borough of Bromley Annual Monitoring Report 2010-2011

⁶ London Plan Policy 7.16 and Chapter 9 of the NPPF

QUESTION SET 2

PREFERRED OPTION 6

Protection of residential gardens

While the use of previously developed land is encouraged, open land in built up areas, including private residential gardens is not considered to be previously developed. Inappropriate development of residential gardens should be resisted where development would cause harm to the local area.

Many residential areas within the Borough are characterised by spacious rear gardens and well separated buildings. The supporting paragraphs to London Plan Policy 3.5 recognise the important role that gardens play. They acknowledge that pressure for new housing development means that gardens can be threatened by inappropriate development and their loss can cause significant local concern. The London Plan supports the presumption against development on back gardens where it can be justified. This is further supported by the NPPF which states that Local Planning Authorities should consider the case for setting out policies to resist inappropriate development of residential gardens for example where it would cause harm to the local area. The Mayor's Housing SPG (November 2012) sets out the importance of gardens which include defining local context and character; providing safe, secure and sustainable environments and play space; supporting biodiversity, protecting London's trees, green corridors and networks; abating flood risk and mitigating the effects of climate change including the heat island effect; and enhancing the distinct character of suburban London.

Having regard to the above, the Council will resist the loss of private residential gardens on the basis of the contribution that they make to the character and appearance of the area (including the contribution made by trees and other vegetation on the site), their contribution to mitigating climate change and reducing flood risk, and their ecological value in terms of providing habitats for wildlife. Proposals which undermine the character of the Borough or which would be likely to result in detriment to existing residential amenities will be resisted.

QUESTION SET 2

PREFERRED OPTION 7

Renewal of existing residential areas.

Policy 3.14 of the London Plan states that loss of housing should be resisted and boroughs should promote the efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings. In particular, boroughs should prioritise long term empty homes, derelict empty homes and listed buildings to be brought back into residential use.

Building a Better Bromley 2020 Vision states that we will foster initiatives designed to bring more empty properties back into use.

The London Plan (Policy 2.14 and Map 2.5) also identifies Areas of Regeneration within the Borough that could benefit from regeneration which could include additional housing provision or the improvement of existing homes. Bromley's approach to these areas is considered later in this chapter (see Options relating to Renewal Areas).

The renewal of existing residential areas should respect local character and enhance and improve the existing area.

QUESTION SET 2

OTHER OPTIONS CONSIDERED

OPTION 8

Intensification of existing areas at a higher density.

As outlined earlier this is not considered sustainable in the long term as it will have a detrimental impact on the valued character of the Borough.

QUESTION SET 2

Quality / Design

PREFERRED OPTION 9

The design of all new housing development should be of a high standard and layout and enhance the quality of local places whilst respecting local character, context and density.

In accordance with the London Plan Policy 3.5, housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment. The design of all new housing developments should enhance the quality of local places taking into account: physical context, local character, density, tenure, and land use mix. All new development should make a positive contribution to the area in which it is located. Good urban design including space around and between buildings and their landscaping contributes to the quality of the built environment. In major development proposals a design statement should be submitted to the Council to include information of the key design principles, density, mix and distribution of uses as well as provide sufficient illustrations to demonstrate the relationship of the development to its wider surroundings.

The Borough is required to incorporate minimum space standards that generally conform with the minimum space standards as set out in the London Plan⁷. This may result in some developments coming forward at densities

⁷ London Plan Policy 3.5 and Table 3.3

lower than that set out in the London Plan Density Matrix and some coming forward at higher densities i.e. optimising housing potential in accordance with LP Policy 3.4.

Regard will be had to the London Plan Density Matrix but the character assessment work already undertaken demonstrates that these can't be strictly applied in all situations without harm to the valued local character.

OPTION 10

All new developments to be built in accordance with the London Plan density Matrix.

This is not a preferred option to be applied across the whole Borough as it is considered it will have a detrimental impact on the character of the Borough. The density Matrix is intended to be used as a guide and there may be convincing environmental or local character arguments for an alternative density.

QUESTION SET 3

NEW PREFERRED OPTION 11

Where housing is part of a mixed use development, the Council will have regard to the amenity and character of the existing area, the existing mix of houses and identified need, and the provision of amenity space.

The London Plan encourages mixed use developments⁸. The incorporation of an element of mixed use into development schemes for business and commercial uses can add variety and diversity of land uses, complementing their surroundings and contributing to sustainable development objectives. Mixed use developments can also assist in bringing forward facilities and services for communities.

The character and amenity of existing residential areas should not be undermined by inappropriate new uses. The residential amenity of the new residential development proposed should not be compromised and the Council will seek to ensure that an appropriate level of amenity space is provided.

QUESTION SET 2

OTHER OPTIONS CONSIDERED

Housing Type and Choice

The London Plan states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. New

⁸ London Plan Policies 2.7, 2.15, 2.16, 3.3, 4.2, 4.3

developments should offer a range of housing choice in terms of mix of housing sizes and types.

Boroughs are required to set an overall target in the LDF for the amount of affordable housing provision needed over the plan period in their areas and separate targets for social rented/affordable rented and intermediate housing. Boroughs should also reflect the strategic priority accorded to the provision of affordable housing. The London Plan states that affordable housing targets may be expressed in absolute or percentage terms.

Affordable Housing

A draft update to the Affordable Housing Viability Assessment (AHVA) has been carried out to bring up to date some aspects of the Assessment carried out in 2010. The Update has assessed a range of scheme scenarios in relation to density, affordable housing tenure, proportion of affordable housing and planning obligation costs across the Borough. The results relate to residual land valuations after the above scenarios have been factored in.

PREFERRED OPTION 12

35% target for affordable housing on sites of 0.4ha or larger or capable of providing 10 units or more. In negotiating the amount of affordable housing on each site, the Council will seek 35% provision, with 60% affordable/social rented housing and 40% intermediate provision unless it can be demonstrated that a lower level should be sought or that the 60:40 split would not create mixed and balanced communities.

A single Borough-wide approach to affordable housing provision is still seen to be a suitable option as opposed to different percentage targets in different locations in the Borough.

The Update has shown that a percentage target of 35% on site affordable housing is still viable. Importantly, there would still need to be flexibility within any detailed policy wordings to enable the percentage of affordable housing on site to be negotiated where necessary.

Whilst the target relates to the percentage of habitable rooms on site, when assessing applications, the Council will consider the overall contribution in terms of floor space and unit numbers to ensure that a proportionate percentage of overall development is affordable housing. Further information on this will be contained in the forthcoming development management policies.

The target is not set as a maximum level and there may be some sites that come forward with more than 35% affordable housing, particularly on smaller sites.

The tenure mix of 60% affordable rented/social rented and 40% intermediate housing is in accordance with LP Policy 3.11 and the Mayor's Housing SPG.

Boroughs are recommended to include affordable rent alongside social rent, for example where an existing policy specifies 70% social rented and 30% intermediate housing for affordable purposes, the affordable rented housing should be within the 70%. The new Affordable Homes Programme (2011-15) is targeted towards Affordable Rented Housing.

Affordable housing will normally be required on site. In exceptional circumstances, a payment in-lieu of affordable housing on site or provision in another location will be acceptable where it can be demonstrated that:

- it would be impractical to transfer the affordable housing to a registered provider (RP); or
- on site provision of affordable units would reduce the viability of the development to such a degree that it would not proceed; or
- on site provision of affordable units would not create mixed and balanced communities and there would be benefit in providing such units at another location.

OTHER OPTIONS CONSIDERED

<p>OPTION 13 <i>50% target for large sites.</i></p>

A target of 50% affordable housing was assessed in the AHVA (2010) because the London Plan (2008) included LP Policy 3A.9 Affordable Housing Targets that specified a strategic London-wide target of 50% affordable housing provision. The AHVA advised that a 50% target would be over ambitious due to; the existence of low value areas, the likelihood that planning obligations would increase, the need to stimulate and maintain all housing supply and that a target up to 40% would be more realistic and still challenging.

As set out above the AHVA Update states that the viability of sites begins to reduce when 40% affordable housing, Mayoral CIL and potential future Borough CIL levels are factored in, especially in lower value areas. Consequently a 50% target would not be consistently achievable on large sites.

<p>OPTION 14 <i>40% Borough-wide target on large sites.</i></p>

The evidence from the AHVA suggests that this may be an option for the Council to consider. The Update also specifies that a target of 40% could be considered.

An emphasis is placed upon the need for flexibility and the potential need to negotiate in some lower value instances or on difficult sites. It is evident that in lower value areas poorer viability results may occur when combined with Mayoral CIL and any future Borough specific CIL requirement. It is more likely that in these instances 40% affordable housing could be accommodated

on uncomplicated greenfield sites (i.e. without major abnormal costs). Medium to higher value sites are seen to be more likely to be able to bear greater costs and obligations, including 40% affordable housing.

OPTION 15
Numerical target.

It would be difficult to forecast a numerical target for the Borough as affordable housing is only being sought on larger sites (10 units and above). The lack of a percentage target applied to individual sites would create landowner and developer uncertainty on the contribution expected - potentially increasing hope value, and stalling the market.

OPTION 16
Increase affordable housing target and therefore provision in some areas and decrease in others.

This would result in an over complicated policy option. The AHVA evidence demonstrates that it may be difficult to set a different target level for different areas due to the varying land values within those areas.

The Update considered the viability of seeking financial contributions on smaller sites.

QUESTION SET 3

NEW OPTION 17
Financial contributions to be sought on sites providing 1-9 dwellings.

The AHVA and the Update included reviewing the potential to bring all new housing sites providing additional net dwellings in to the overall policy scope. This is compared to the existing position where affordable housing is required on sites providing 10 or more dwellings. The approach taken in the Assessment and the Update is to consider if financial contributions from smaller sites (i.e. 1-9 units) could be viable.

The Update sets out that it is often impractical to expect on-site affordable housing to be integrated into the smallest sites especially sites of fewer than 5 dwellings. It may be possible in some instances but problematic in others owing to design, affordability and management issues.

The evidence set out in the Assessment and the Update suggests that it could be viable in some instances to introduce financial contributions for smaller sites. The figures that could be considered are 10% of the number of affordable housing units for sites of 1-4 units and between 10-20% for sites of 5-9 units. (for example for a 2 unit scheme, 10% affordable housing equates to 0.1 units).

The introduction of financial contributions on smaller sites is not a preferred option due to the complexity and uncertainty and potentially negative impact on bringing sites forward.

QUESTION SET 2

NEW PREFERRED OPTION 18

Apply the principles of affordable housing policy to care home developments (Class C2)

New Extra Care Housing developments are treated as residential dwellings (C3) and therefore subject to a S106 requirement for an affordable element or financial contributions. The London Plan (para 3.51) also supports the principles of affordable housing to the range of developments including Care Homes (Class C2). These principles include taking account of site circumstances, development viability, needs assessments and circumstances where “off-site “ contributions, contingent obligations or other phasing measures may be appropriate.

QUESTION SET 2

PREFERRED OPTION 19

Development should provide a mix of housing types that reflects local circumstances and contributes to sustainable communities.

Encouraging a mix of housing types and sizes will help address local shortages across different tenures and will assist in providing sustainable, inclusive and mixed communities in accordance with the NPPF (para 50) and London Plan Policies. Importantly, there are key client groups that the Council has statutory duties towards (e.g. the homeless, care leavers and those owed a duty under the Children’s Act for example).

Current evidence demonstrates that there is an existing need for family homes across all tenures (in particular 3 and 4 bed units). We recognise that this need will change throughout the life of the plan and therefore this evidence will be kept under review and updated accordingly. Development proposals coming forward should have regard to the most up to date evidence.

The London Plan requires that all new housing to be built to Lifetime Homes standards enabling people to live in their own homes if their mobility is impaired. There will however be those who wish to move to alternative accommodation for a range of reasons. Some feel isolated and wish to move out of choice, whilst others require alternative accommodation out of necessity.

QUESTION SET 2

Specialist Accommodation

The London Plan requires ten percent of new housing is designed to be wheelchair accessible. This is generally provided as affordable housing, as is the majority of supported housing for other vulnerable groups including, people with mental health problems, people with learning disabilities, homeless people, and vulnerable young adults from 16 years. The nature of this supported housing (accommodation and support service) is provided in a variety of forms, from hostel accommodation with shared facilities, to self contained units with co-ordinated and holistic support plans.

Whilst the majority of older people (80%) live in private accommodation, only 30% of specialist older persons housing is available in private tenures (private rented or owner-occupation). This highlights an imbalance in the tenure mix available to older person households. (“A better fit? Creating housing choices for an ageing population” 2012).

The London Plan notes the scale of the projected growth in London’s older population. Bromley has the largest older population in London with 48,800 people aged 65+ years in 2011, expected to increase to 52,350 by 2014 (source: GLA Round 2010 Population Projections SHLAA).

The body of evidence illustrates the scale of the challenge presented by an ageing population and the need to increase accommodation choices. This challenge will need to be addressed over the plan period with an increasing pressure on the provision of appropriate housing for older people.

The responses to the Core Strategy Issues Document consultation support the widening of options and choices for older people who may be seeking private assisted or extra care. The benefits to the housing market of properties released back into the housing market as a result of downsizing were also highlighted.

PREFERRED OPTION 20

Work with partners to encourage the provision of specialist and supported accommodation, to meet the particular needs of the borough’s residents, including wheelchair users, vulnerable and older people.

QUESTION SET 2

QUESTION SET 4

Renewal Areas

Introduction and Background

“Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives” (National Planning Policy Framework)

Under the London Plan, Boroughs need to identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing, in local plans and strategies.

Such an integrated approach to these areas will assist in delivering the 2030 Vision for the Borough as set out at the beginning of this document. In particular it will contribute to meeting the objectives related to homes, business, employment and the local economy and health and wellbeing.

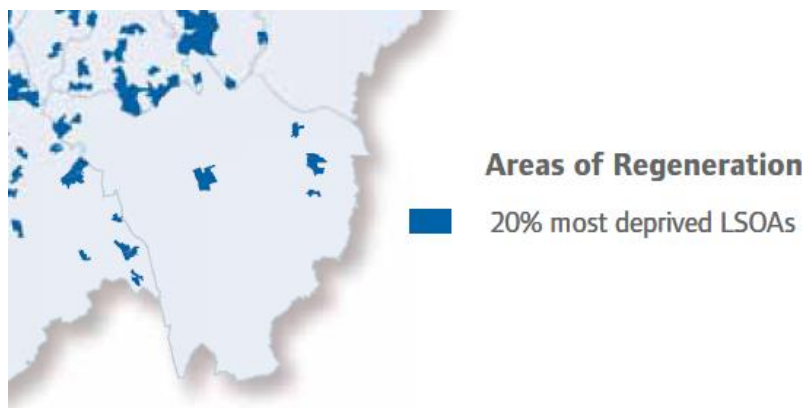
Working with the Council and strategic and local partners the Mayor will prioritise investment for “neighbourhood based action” in these areas (LP Policy 2.14).

Local issues and evidence

The London Plan Map 2.5 (copied below) identifies 6 areas in Bromley, as Regeneration Areas. The areas include:

- Betts Park area
- Maple Rd, Franklin Rd area
- Turpington Lane area
- Cotmandene Crescent, Whippendell Way area
- Blacksmith Lane, Wooten Green, Rookery Gardens area
- Quilter Road, Ramsden area

The London Plan (July 2011) Map 2.5 Regeneration Areas



Source: Department for Communities and Local Government
ONS Lower Super Output Area Boundaries. (2007)

The London Plan highlights these areas based on information about

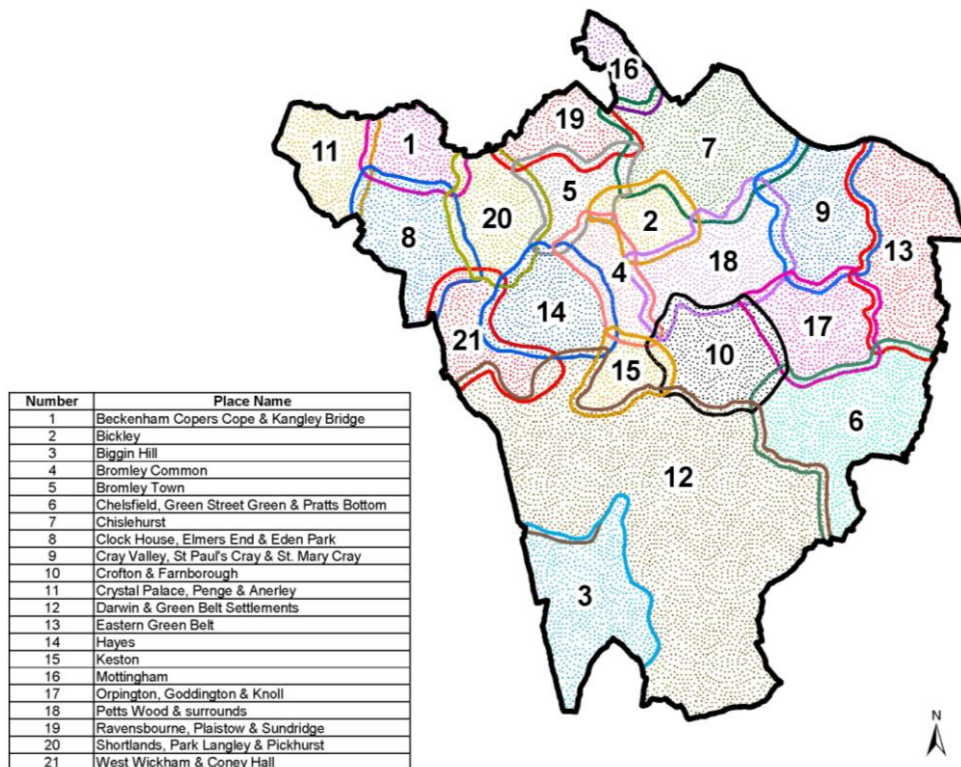
- income,
- employment,
- health deprivation and disability,
- education, skills and training,
- barriers to housing,
- crime.

Generally Bromley Borough scores favourably, however the pattern of scores, set out in detail in the Bromley Joint Strategic Needs Assessment (JSNA) 2011 is varied within the Borough, with concentrations of poorer scores to the north west of the Borough in Crystal Palace, Penge and Anerley, to the north in Mottingham, and to the east in the Cray Valley, as well as centrally through Downham and Bromley Common.

The areas identified in the London Plan map are a snapshot highlighting tightly drawn artificial electoral districts. They do not take account of changes taking place over time, the picture in the wider area or other areas where the Council and partner organisations are already seeking to address issues of renewal, notably other parts of Crystal Palace, Penge & Anerley, the Cray Valley and Mottingham.

Bromley’s Core Strategy Issues Document (2011) described the distinct characteristics of the different “Places” within Bromley. The “Places” which contain the highlighted areas for regeneration (London Plan map 2.5) are also likely to be subject to the greatest change.

Map of Bromley’s Places



Strategic Policy Options

As required by the London Plan the Local Plan will define areas for renewal and develop integrated spatial policies to address the Bromley Local Plan vision.

Identifying Areas for Renewal

PREFERRED OPTION 21

Define “Areas for Renewal” rather than “Areas for Regeneration”

The Council proposes to define “Areas for Renewal” based on particular “Places”, as understood through the Core Strategy Issues Document (2011). This approach acknowledges that areas which would benefit from renewal opportunities and Mayoral investment do not have such sharply defined borders. An approach based on “Places” enables the Council to consider proposals in the wider vicinity to support renewal, address issues highlighted through Bromley’s Joint Strategic Needs Assessment (JSNA) and deliver the vision of this Plan.

QUESTION SET 2

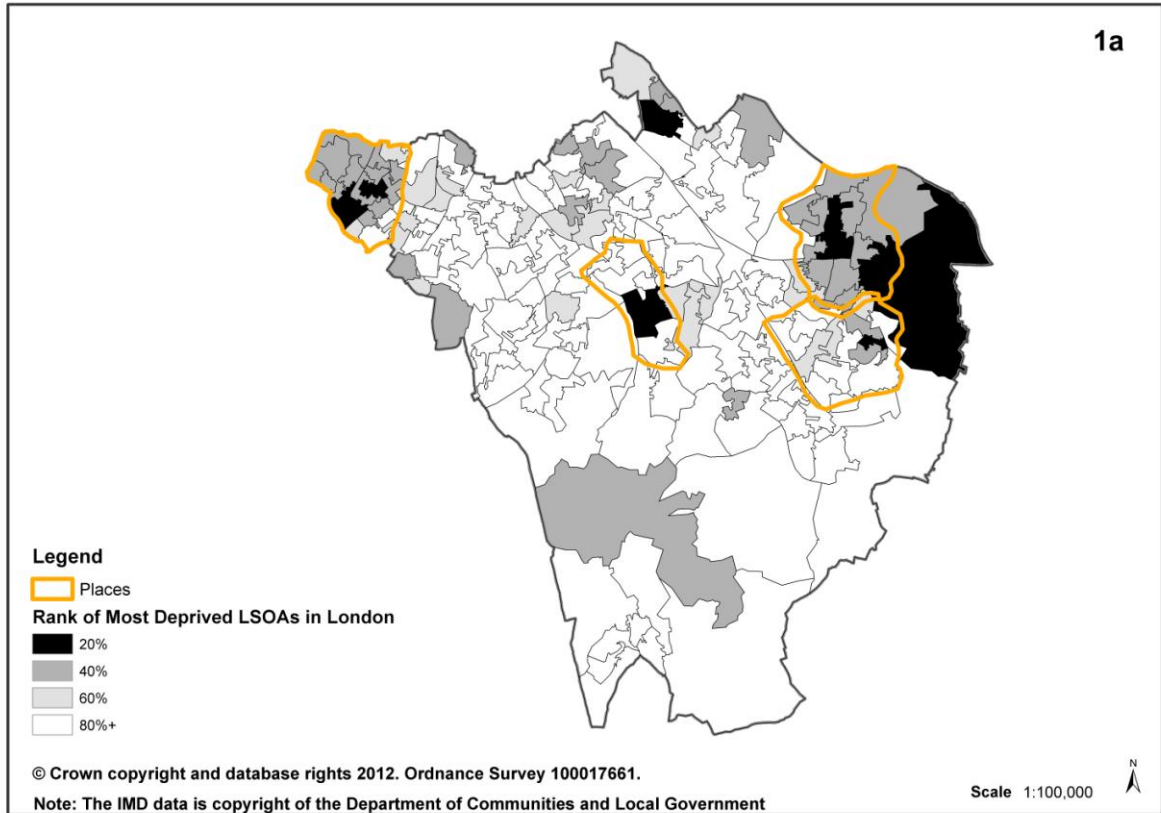
PREFERRED OPTION 22

Identifying the Areas for Renewal based on “Places” which include the areas highlighted in the London Plan (grouped where adjacent.)

Areas for Renewal based on “Places” which include the areas highlighted in the London Plan, namely:

- “Crystal Palace Penge & Anerley
- “Bromley Common”
- “Cray Valley, St Paul’s Cray & St Mary Cray”
- “Orpington, Goddington & Knoll”

The two “Places” described as “Cray Valley, St Paul’s Cray & St Mary Cray” and “Orpington, Goddington & Knoll” lie adjacent to one another and it is therefore sensible to address renewal issues along a single Area for Renewal to be referred to as “The Cray Valley”.



OTHER OPTIONS CONSIDERED

NEW OPTION 23

Identifying the precise areas highlighted in The London Plan as of “Areas for Regeneration”.

The individual Lower Super Output Areas do not provide a logical basis for renewal strategies seeking to improve the environmental, economic and social sustainability of the areas, and therefore a tight definition of areas based on the artificial electoral districts is not considered appropriate.

OPTION 24

Areas for Renewal based on individual “Places” rather than grouped as in Option 22.

Two Areas for Renewal lie adjacent:

- “Cray Valley, St Paul’s Cray & St Mary Cray”
- “Orpington, Goddington & Knoll”

Considering adjacent Areas for Renewal separately would fail to maximise opportunities for synergies across adjacent areas.

QUESTION SET 3

Duty to Co-operate

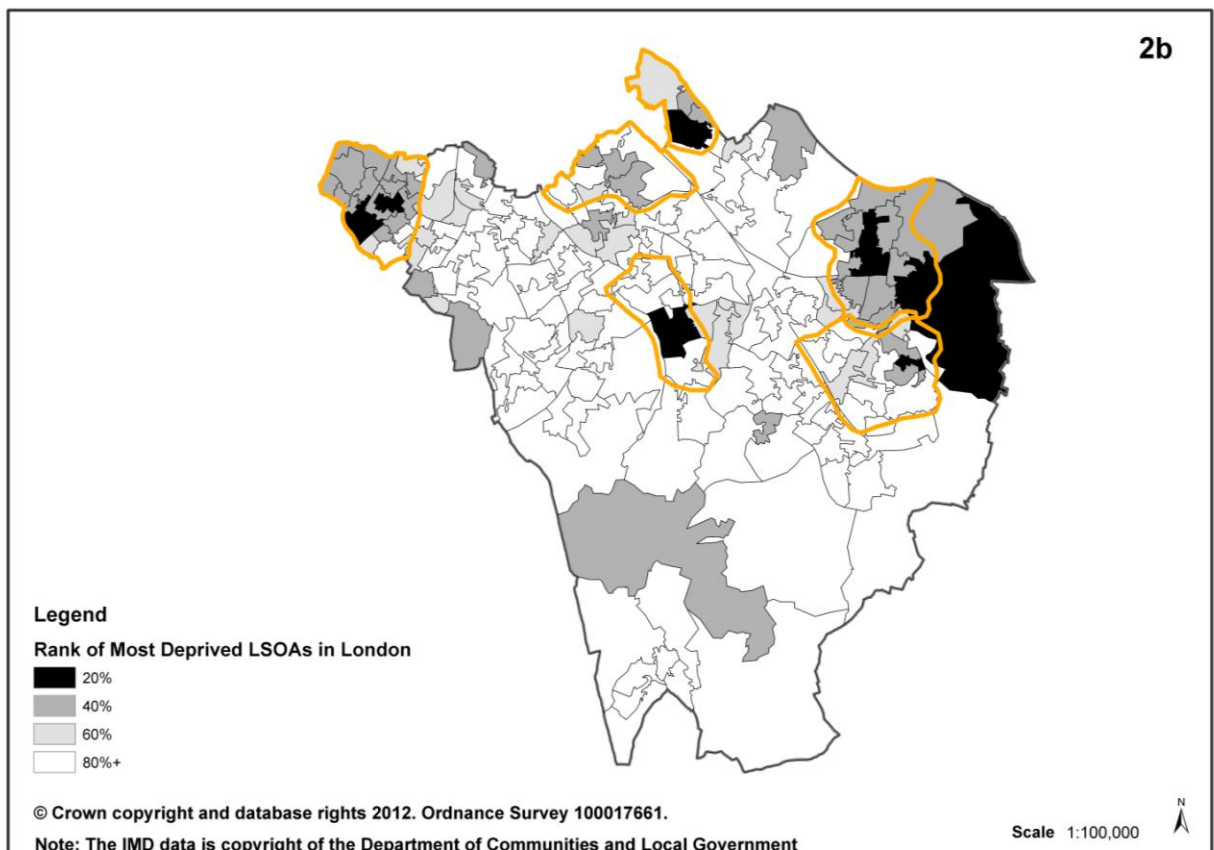
The Localism Act places a duty on local authorities to work together on planning issues. The NPPF expands on this, indicating that Local Plans should be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.

PREFERRED OPTION 25

Additionally, identify as Renewal Areas those Bromley Places abutting “Areas for Regeneration” in neighbouring boroughs, where estates cross borough boundaries.

In addition to the Areas for Renewal identified in Option 22, identify Bromley Places where estates cut across borough boundaries into Regeneration Areas in adjacent boroughs:

- (i) “Ravensbourne, Plaistow & Sundridge” (adjacent to Downham, Lewisham). Several Bromley roads form part of the interwar “Downham Estate”, the Lewisham element of which is defined as an “Area of Local Regeneration” within the Lewisham Core Strategy.
- (ii) “Mottingham” (adjacent to Grove Park, Lewisham, adjacent to Eltham, Greenwich). Several estate roads straddle the borough boundaries and adjacent estates share similar characteristics to the Mottingham Estate.



PREFERRED OPTION 26

The Council will work with adjacent authorities and local stakeholders in order to plan strategically across administrative boundaries and to meet the duty to co-operate.

To address cross borough issues along the length of the Boroughs' boundary, considering in particular areas of pressure on social infrastructure, close to our shared borders with neighbouring boroughs, (notably along the urban & suburban boundaries to the north and west of the Borough).

With regard to the Areas for Renewal as identified in preferred Option 22 and Option 25, this will involve working:

- (i) chiefly with Croydon, but also with reference to Southwark, Lambeth and Lewisham in respect of "Crystal Palace, Penge and Anerley"
- (ii) with Lewisham and Greenwich in respect of "Mottingham"
- (iii) with Lewisham in respect of "Ravensbourne, Plaistow & Sundridge" and,
- (iv) with Bexley in respect of "The Cray Valley"

OTHER OPTIONS CONSIDERED**OPTION 27**

Additionally, identify all Bromley "Places" which adjoin London Plan Regeneration Areas in neighbouring boroughs.

In addition to the "Places" identified in Option 22, identify as "Areas for Renewal" all "Places" with abutting regeneration areas in adjacent boroughs (excluding open space boundaries), namely:

- (v) "Clock House, Elmers End & Eden Park"
- (vi) "Beckenham, Copers Cope & Kangley Bridge"
- (vii) "Ravensbourne, Plaistow & Sundridge"
- (viii) "Mottingham"
- (ix) "Chislehurst"

Of the relevant "Places" only two (identified in Option 25) have a clear cross Borough relationship, in respect of renewal issues. It is not therefore considered necessary to designate the other three "Places".

QUESTION SET 3

Delivery

As required by the London Plan (LP Policy 2.14) the Council will set out integrated spatial policies and work with strategic and local partners to co-ordinate plans for improvement in Areas of Renewal, including learning and skills, health, safety, access, employment, environment and housing.

PREFERRED OPTION 28

Where development opportunities exist or arise within Renewal Areas, or within such proximity that they could significantly impact on the Areas, the Council will seek to maximise their contribution to social, economic and environmental improvements, and will consider preparing development briefs to achieve this end.

Locally sensitive proposals involving economic, education and training, housing, social, transport, security, heritage, development and environmental measures can support improvements in Renewal Areas. Renewal opportunities should involve active engagement with residents, businesses and other appropriate stakeholders, taking account of aspirations for the specific area concerned and the wider Renewal Area.

The London Plan indicates that in its identified areas for regeneration the Mayor will work with strategic and local partners to co-ordinate their sustained renewal by prioritising them for neighbourhood-based action and investment.

QUESTION SET 2

QUESTION SET 4

Gypsies and Travellers and Travelling Showpeople

Introduction and Background

Local planning authorities have a statutory duty to assess accommodation needs of travellers under the Housing Act and for the preparation of Local Plans. The options are in accordance with guidance, address local needs as indicated in the evidence paper, and will assist the Council with swift and effective action against future unauthorised developments.

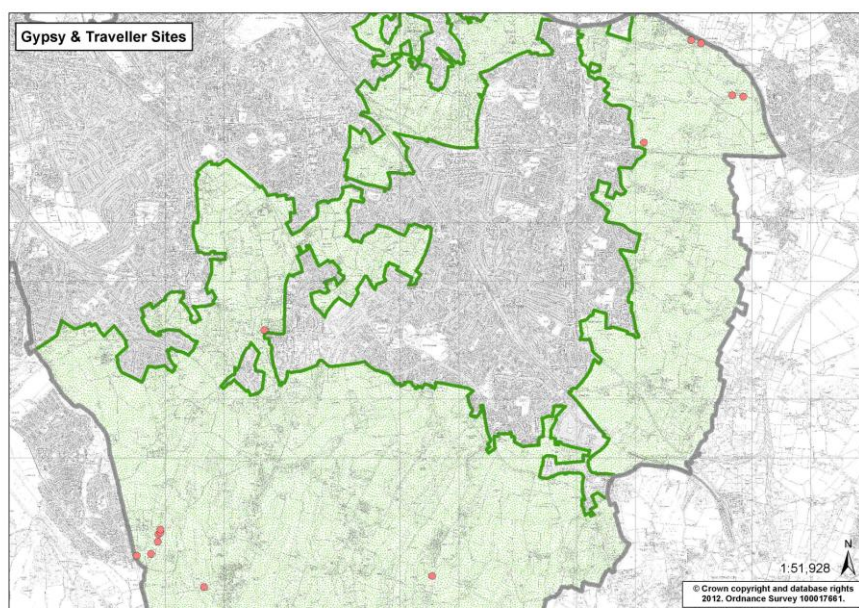
Gypsies and Travellers have traditionally stopped in Bromley whilst working in and travelling through the Borough. The 1960 Caravan Sites and Control of Development Act prohibited caravans from common land. With fewer stopping places much of the Gypsy and Traveller population became settled and placed in social housing stock. St Mary Cray has one of the largest settled housed Gypsy populations in the UK. Of those who retain a nomadic lifestyle the majority are Romany Gypsy families, based chiefly on two Council sites in the Cray Valley. There are also a number of Irish Travellers on temporary sites across the Borough.

There is also a community of Travelling Showpeople in Layhams Road. Show people are a community of self employed business people who travel the country, often with their families, holding fairs. They do not in general share the same culture or traditions as Gypsies and Travellers

The Government Planning Policy for Traveller Sites, relates to “Gypsies and Travellers” and “Travelling Showpeople” under the umbrella of “travellers”. It requires local planning authorities to make their own assessment of need for the purposes of planning, demonstrating an up-to-date five year supply.

Map 1 (below) pinpoints Gypsies and Travellers and Travelling Showpeople locations, and the evidence base document sets out their current planning status. All lie within the Green Belt.

Map1



Pressure for Sites

All the existing 36 Local Authority pitches in the Borough are currently occupied. A private site with permission is not available to Gypsies and travellers. A second private site is currently the subject of an appeal to increase the number of pitches.

There are currently 16 long established pitches across the Borough without permanent permission. 13 pitches have temporary permissions due to expire over the next 2 to 3 years, whilst another site, which has been occupied for over 17 years, has an expired temporary permission for 3 pitches.

Additionally there are 10 outstanding applications for a pitch on the waiting list for the Council's sites some relating to families currently housed in bricks and mortar, others relating to families currently on the Councils pitches and another from a family on the south coast.

The Travelling Showpeople's Guild have confirmed that the recent permission satisfies their needs until 2017.

In addition to establishing the appropriate level of pitch provision the guidance also requires Local Plans to address effective enforcement of planning policy.

Speeding up the enforcement process helps to keep costs down. Enforcement action will be quicker and more effective, and a wider range of powers can be used, where appropriate authorised provision is made for Gypsies and Travellers within the area. ("Guide to effective use of enforcement powers" ODPM 2006).

Enforcement against unauthorised developments, where the land is within the ownership of the Gypsies and Travellers, where the intention is to set up a permanent family are addressed through the planning process.

Unauthorised Encampments

Aside from authorised and unauthorised site developments considered above Bromley has recently been the subject of short term unauthorised encampments. There have generally been approximately 3 – 5 encampments per year, although this year (2012) there have been 8 this summer, where, Gypsies and Travellers arrive on land not within their ownership, without the intention to set up a permanent base. These incursions, which can be the same family group moving locations, tend to take place in open public spaces (e.g. park land or car parks) or on private land.

Strategic Policy Options

In order to facilitate effective enforcement and in response to the latest guidance “Planning policy for traveller sites” (PPTS) the Council needs to consider options to meet current need of up to 25 pitches and “demonstrate an up to date 5 year supply of deliverable sites”.

All sites in Bromley which have either current or historic use as traveller sites lie within the Metropolitan Green Belt. Whilst the PPTS makes the point that such sites are inappropriate, the studies commissioned by Bromley have pointed out the difficulty in practice of finding sites other than within the Green Belt.

The PPTS advises that local planning authority can, through the plan making process, make exceptional limited alteration to the defined Green Belt boundary to accommodate a site inset within the Green Belt, to meet a specific, identified need for a traveller site. Subject to the outcome of the consultation alterations will therefore be made in respect of all Green Belt sites with permanent permission for use by travellers and sites which are allocated as a result of this process.

Local Authority Sites

A previous permission for 3 pitches on the Star Lane site lapsed in 2009. There is no additional capacity to create additional pitches at Old Maidstone Road.

PREFERRED OPTION 29

Further expansion of existing Local Authority sites

Seek Government funding to create 3 pitches on the Star Lane site (see Map 2). There is no further scope for expansion at the Old Maidstone Road site.

Existing Private Sites without permanent permissions

PREFERRED OPTION 30

Allocate certain existing sites without permanent permissions as Traveller sites.

As highlighted above, and identified in the evidence base there are currently 16 long established pitches across the Borough without permanent planning permission.

(i) Saltbox Hill. (see Map 3)

This single site, known as “Meadow View”, contains 3 pitches for which temporary permission has now lapsed. It is occupied by one family who have been on the site for some 17 years. Their children and now their grandchildren are schooled locally they are an established part of the local community in Biggin Hill.

(ii) Layhams Road. (see Map 3)

There are temporary permissions for 10 pitches 4 sites close to the boundary with Croydon, which will lapse in 2014 and 2015. The families are established in the area with the children schooled locally, just across the Borough boundary in New Addington which provides good accessibility to other local shops and services.

- Millies View
- St Josephs Place (Dixon’s Holdings)
- Mead Green
- Delany & Cash

(iii) Hockenden Lane. (see Map 2)

There are temporary permissions for 3 pitches on 2 sites. The temporary permissions were granted on appeal on these sites in 2007 and again in 2009. Permissions on both sites expire in 2015 by which time the occupants will have lived on the sites for around 10 years making use of services in nearby Swanley.

- Adjacent to Vinsons Cottages
- Trunks Alley

Additionally there are two existing sites which benefit from established use certificates as “caravan sites” rather than “traveller sites”. Nonetheless they can assist the Council in addressing future needs over the lifetime of the plan, without the need to seek new Green Belt sites.

(iv) Chalk Pit, Old Maidstone Road

Since 1960 the site known as “Chalk Pit” has had numerous temporary permissions (prior to the 1968 Caravan Act when the Gypsy status of applicants became a material consideration). The permissions were described as “for the siting of residential caravans”. An Established Use Certificate for 25 caravans was finally granted in 2003. Allocation of this private site would

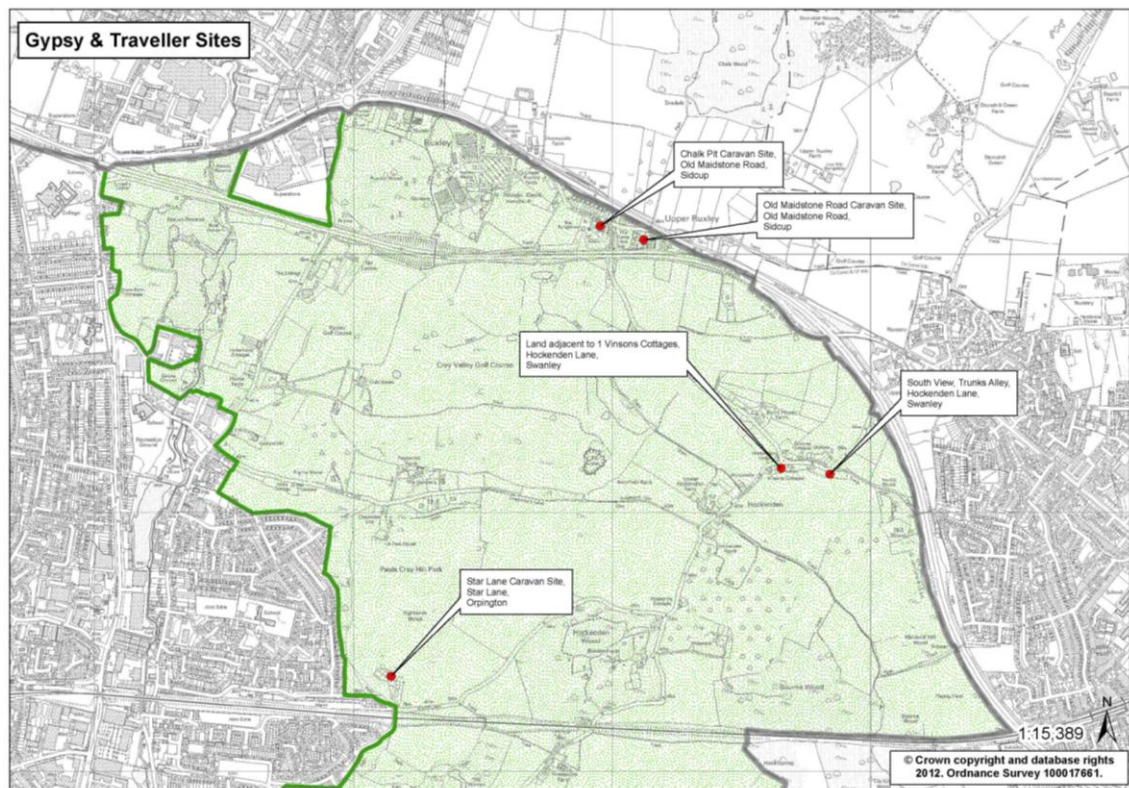
not affect the existing permission nor guarantee that the site would immediately come forward as traveller pitches, however, its designation as a Traveller Site offer potential to negotiate such a use, if necessary, over the period of the plan. (Recent contact indicates that the caravans on the site are currently unoccupied).

(v) King Henry's Drive

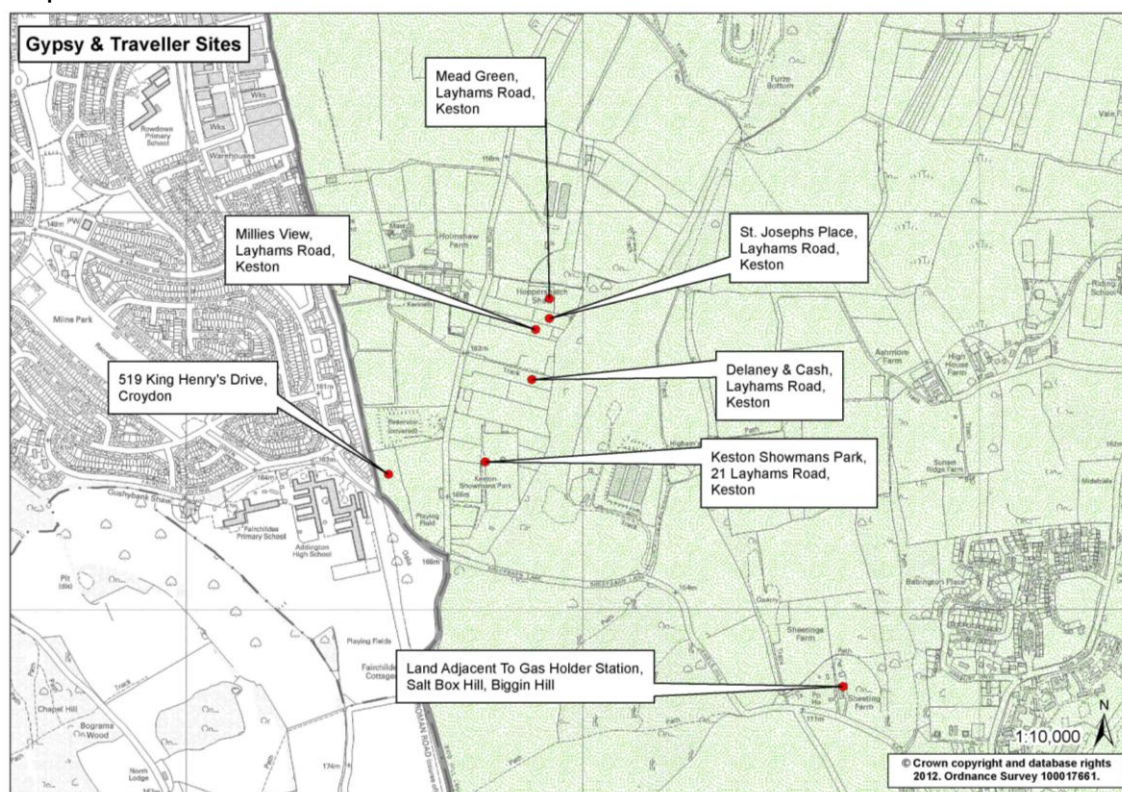
The site was purchased by a family of travelling Showmen in the mid 1960's. The Council considered the use of the site in 1998 and 2001 and resolved to take no further action against the continued use of this land as showmen's permanent accommodation. In 2003 the Council granted a certificate of lawfulness for existing use as "a permanent residential caravan site for 13 caravans" for the northern part of the site. It is however clear from aerial photographs dating back to 1998 that the southern part of the site (which contains vehicles and equipment) has been in unauthorised use since at least that date.

The evidence base and previous studies undertaken for the Council support the need for permanent pitches to address the long term need on existing temporary sites and the future need for additional pitches over the plan period.

Map 2



Map 3



All the existing sites, with or without permission lie within the Metropolitan Green Belt. Whilst the latest guidance (PPTS) makes the point that such sites are inappropriate, previous studies commissioned by Bromley have indicated the difficulty in practice of finding sites other than within the Green Belt.

The London Plan affords Metropolitan Open Land the same protection as Green Belt and Urban Open Space is designated for its local importance. Given the London Plan emphasis on optimising the use of land and the pressure for housing, land that becomes available within the urban and suburban environment has the potential to make an important contribution to meeting the Boroughs and London's housing targets. They are therefore included within the Strategic Housing Land Availability Assessment. The Mayor has just put out a call for sites.

The PPTS aims to reduce tensions between settled and traveller communities in plan-making and to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.

On this basis the Council has no alternative other than to consider meeting traveller needs in Green Belt locations and treat them as indicated in the PPTS as sites inset within the Green Belt for traveller use only.

OTHER OPTIONS CONSIDERED

NEW OPTION 31 ***Seek additional sites***

Subject to defining traveller sites on the basis of Options 29 and 30, above the Council does not propose further Green Belt site allocations.

QUESTION SET 3

PREFERRED OPTION 32 ***Criteria based policy for new Gypsy and Traveller site proposals***

The Council will develop a criteria based policy to address future needs and consider proposals submitted to the Council

- (i) Consider first the potential of existing sites and sites defined through this process for use by Travellers, resisting further alterations to the Green Belt boundary.
- (ii) Consider applications for new sites subject to:
 - the need for additional provision
 - open space policies
 - impact on residential amenity
 - access to services
 - environmental factors, including flood risk

QUESTION SET 2

Sub regional provision – Duty to Co-operate

Working with sub regional partners in respect of transit sites and plots for travelling showpeople will ensure that the responsibility for provision is shared by authorities, who have a duty to co-operate.

Transit Site

The NPPF requires local authorities to address the needs for transit site accommodation. The provision of transit pitches will assist in addressing the issue of unauthorised encampments.

PREFERRED OPTION 33 ***To work with sub region to secure a transit site***

The NPPF advises that the number of pitches or plots should relate to the surrounding population's size and density. All boroughs in the sub region, and indeed across London, have a lower provision of pitches and plots than Bromley. In line with the guidance in the NPPF the Council will work

collaboratively with neighbouring local planning authorities, with a view to securing a transit site elsewhere in the sub region.

QUESTION SET 2

Travelling Showpeople

The Travelling Showman's Guild has agreed that the provision recently made at the Keston site (see Map2) meets the needs for Travelling Showpeople to 2017. Beyond 2017 a further 0.43 plots would be necessary to address the 5 year supply and hence no further provision is required at this time.

PREFERRED OPTION 34

To work with the sub region to address the 5 year provision for Travelling Showpeople

Work with boroughs within the sub region, all of whom have a lower provision of Travelling showpeople plots, to address the need for future provision for travelling showpeople.

QUESTION SET 2

PREFERRED OPTION 35

Criteria based Policy for Travelling Showpeople Plots

Dependant upon sub regional negotiations the Council may develop a criteria based policy to address future proposals

- (i) Consider first the potential for the intensification of the existing sites
- (ii) The Council will resist new sites but consider the expansion of the existing sites to accommodate expansion beyond 2017 on the basis of
 - the need for additional provision
 - open space policies
 - impact on residential amenity
 - access to services
 - environmental factors, including flood risk

QUESTION SET 2

QUESTION SET 4

A suite of Development Management Policies will be produced to support the strategic options

Development Management policies (housing)

Housing design
Minimum floor space
Garden size
Play space
Lifetime homes
Wheelchair accessibility
Secured by design
Privacy
Lighting
Street scene
Layout
Space about buildings
Scale of extensions
Side space
Residential amenity
Resist net loss of older persons accommodation
Supported housing, location and need
Code for Sustainable Homes
House in Multiple Occupation (as defined in the Housing Act 2004)

Development Management policies (renewal areas)

- to bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing (noting the London Plan requires no loss of housing)
- to assess tenure splits in Renewal Areas to ensure a balanced mix of housing and deliver sustainable communities.
- to work with the Mayor and stakeholders to access funding for neighbourhood based action.
- to set criteria to negotiate maximum benefits to the Areas of Renewal and address shortfalls

Development Management policies (Travellers sites)

Criteria based policy for future needs for

- Gypsies and Travellers and
- Travelling Showpeople

SUPPORTING COMMUNITIES

Introduction and background

Bromley's communities are supported by a wide a range of community services and facilities. The provision and maintenance of appropriate social infrastructure is fundamental to ensuring Bromley has strong and stable local communities. The nature of social infrastructure is varied in type and size, as appropriate to different catchments, and for example, includes the following:

- At local community level - GPs and clinics, primary schools and early years provision, village halls, churches, libraries, police safer neighbourhood teams, public houses and local open spaces,
- Facilities such as secondary schools and colleges, ambulance & fire stations and parks, have wider catchments within the borough
- The Princess Royal University Hospital (PRU), Bromley College of Further and Higher Education and the Churchill Theatre serve Bromley and neighbouring boroughs whilst the National Sports Centre and the specialist mental health services at the Bethlem (South London and Maudsley Trust) are used by people from London, the South East and nationally.

The National Planning Policy Framework sets out planning principles, advising that Local Plans should deliver sufficient community and cultural facilities and services to meet the needs of the local population (such as for sports, recreation and places of worship). Policies should take account of the health status of the population, understand barriers to improving health and wellbeing and support local strategies to improve health, social and cultural well being for all.

With regard to equality and inclusion the Council is required to comply with the Equality Act 2010. Additionally the London Plan requires boroughs to develop policies to ensure physical environment can meet highest standards of accessibility and inclusion (Policy 7.2).

Local issues and evidence

Changes in population structure lead to different pressures on community infrastructure. The population in Bromley rose by over 13,500 (approximately 5%) during the decade since the 2001. The most significant increases are observed in both the young and the older populations:

- 0-19yr olds accounted for 24% of the Bromley population in the 2001 Census, and with a marked increase in births since 2001, this age group has now expanded by around 3,500 and is projected to increase to 26.8% of the Boroughs population by 2026. Additionally, advances in modern medicine have resulted in more children with disabilities and complex needs surviving at birth and into later life.
- Bromley has the largest elderly population in London. The number of older people in the borough continues to increase with over 6,000 more people over 60years of age recorded in 2011 than in 2011, almost half of the total

borough increase. Notably the population aged 80 years plus is predicted to rise to 5.6% of the Boroughs population by 2021.

The main implications of these demographic changes include pressures on

- Health facilities
- Education facilities
- Community facilities (to support and quality of life)
- Recreational & cultural facilities (including provision specifically for youth)

It is also important to note that there are spatial implications of these changes, with the pattern of population growth varying between wards.

There is a spatial dimension to the demographic changes, to the historic patterns of existing provision and to transport access (notably in some suburban and rural locations). Included amongst the range of spatial issues the Local Plan needs to address are:

- the capacity of social infrastructure to meet the needs of the Borough's increasing population over the plan period, particularly,
 - in areas of planned growth,
 - in "Areas of Renewal" based on the London Plan defined "Areas of Regeneration" (see Living in Bromley section),
- opportunities to ensure the sufficiency and flexibility of community facilities in the "Places" in Bromley, including in particular:
 - town centres and local centres,
 - rural Green Belt villages, (note separate paper on Working in Bromley)
- the impact of increasing pressures on social infrastructure from demand beyond the Borough boundary.

The responses to the Core Strategy Issues Document consultation indicate that residents highly value facilities and environments that benefit their local community. They recognise the contribution such facilities make to health and wellbeing and acknowledge the disparities in health and wellbeing across the Borough.

Strategic policy options

Defining Community Uses

The availability of local community venues across the borough is essential to enable locally accessible services and support people's quality of life, through support services, cultural and social activities. Community facilities often face challenges in finding or retaining sites due to the nature of the activities, the impact on residential amenity and to financial pressures.

PREFERRED OPTION 35

To support the quality of life in all Bromley's neighbourhoods through the appropriate provision of a range of social infrastructure including health and education provision, cultural, play, recreation and sports facilities, places of worship, and provision related to community safety such as police facilities and fire stations.

QUESTION SET 2

The London Plan advises that the list above, taken from its Policy 3.16, is not intended to be exhaustive and other facilities can be included as social infrastructure, including informal recreational facilities. The NPPF advises that planning policies should plan positively for the provision and use of shared space and community facilities, promoting opportunities for meetings between members of the community. Not all such places fall within the London Plan definition of “Social Infrastructure”, for example the NPPF specifically mentions local shops and public houses. Additionally there may be other local infrastructure, open spaces or facilities which are distinctive to Bromley borough or the “Places” within Bromley identified in the Core Strategy Issues Document (July 2011).

The Local Plan can therefore develop on the basic London Plan definition of Social Infrastructure to take account of the particular character of Bromley and the Places within Bromley to ensure it retains its distinctive nature.

The closure or sale of these places can sometimes damage communities. Under the Localism Act, voluntary and community organisations can nominate an asset to be included on a list of ‘assets of community value’ that the Council will hold. The community will then be given a period of time to prepare and make a bid for the asset.

PREFERRED OPTION 36

Additionally define types of community facilities identified locally as important to the community.

QUESTION SET 2

Planning for Social Infrastructure

Against the backdrop of increasing demands on community services and facilities and the spatial variation of provision, the Council will need to work with agencies and providers to ensure a wide range of accessible community, recreational and leisure facilities to support well being and enhance quality of life. The London Plan, requires local authorities, to engage with partners and stakeholders, in developing their Local Plans, working with local groups and communities to identify their needs, maximise equality of access to facilities, support local strategies to improve health and wellbeing and plan positively for the provision of sufficient community and cultural facilities and services, and enabling their development & modernisation. (Policies 3.16 – 3.19)

The Infrastructure Delivery Plan, which will be continually reviewed, will identify supporting infrastructure, including schools, open space, community, health and leisure services which will assist in creating thriving and sustainable places in Bromley over the Local Plan period.

The Local Plan seeks to ensure locally accessible shops, services and facilities. Locally accessible facilities can be best ensured through a town centre first approach for new community use proposals. Such a strategy will be supported by proposed flexible approaches to retail frontages and in turn assist in maintaining and improving neighbourhood centres and parades across the borough. It is however acknowledged that for some facilities and services a more local geographical spread is desirable to support appropriate provision. In such circumstances locations additional to site in area identified as priority locations would be appropriate.

The responses to the Core Strategy Issues Document consultation highlighted the importance of accessible facilities. In particular responses proposed encouraging new facilities in accessible locations and the flexible, enhanced and efficient use of existing community facilities. Responses stressed the need for greater social integration and specific reference was made to the need for facilities of young people and places of worship.

PREFERRED OPTION 37

Develop a “Town Centre First” sequential test approach for new community uses to prioritise:

- Town Centres / Village centres,***
- existing community sites (hub creation),***
- as part of major mixed use developments where no appropriate town centre location available,***
- relocations to more accessible locations***

Existing community uses are scattered throughout the borough. The mixed community use of existing buildings can enhance their long term sustainability and supporting uses viability financially marginal uses and new community buildings to be designed flexibly for multiple use. Where facilities are re-provided in more appropriate buildings the challenge is to find an appropriate use for the redundant infrastructure which may include historic public buildings which may be listed or lie within conservation areas.

QUESTION SET 2

PREFERRED OPTION 38

Support for “community hubs”, providing a range of community infrastructure.

QUESTION SET 2

Education

Context

The National Planning Policy Framework advises that local authorities should “give great weight to the need to create, expand or alter schools”. The Academies Act (2010) has changed the landscape of education provision. Academies are publically funded independent schools which are free from local authority and national

government control. The Act also encourages the establishment of new Free Schools, which are all-ability state funded schools set up in response to parental demand.

The London Plan highlights Local authorities' strategic role in taking a proactive, positive and collaborative approach to development that will widen choice in education, promoting a good supply of strong schools and encouraging the development of Academies and Free Schools. Whilst the Academies Act widens the scope of providers, Local Authorities are still be required to fulfil their statutory duty to secure sufficient school places within their areas. This will involve a collaborative approach as indicated in the London Plan.

The statutory age for education and training is increasing to 18+ years by 2015 and the shape of higher and further education is currently changing with the recent merger between Bromley College of Further and Higher Education and Orpington College of Further Education. It is clear from the recent White Paper that the nature of Higher Education will continue to evolve over the plan period.

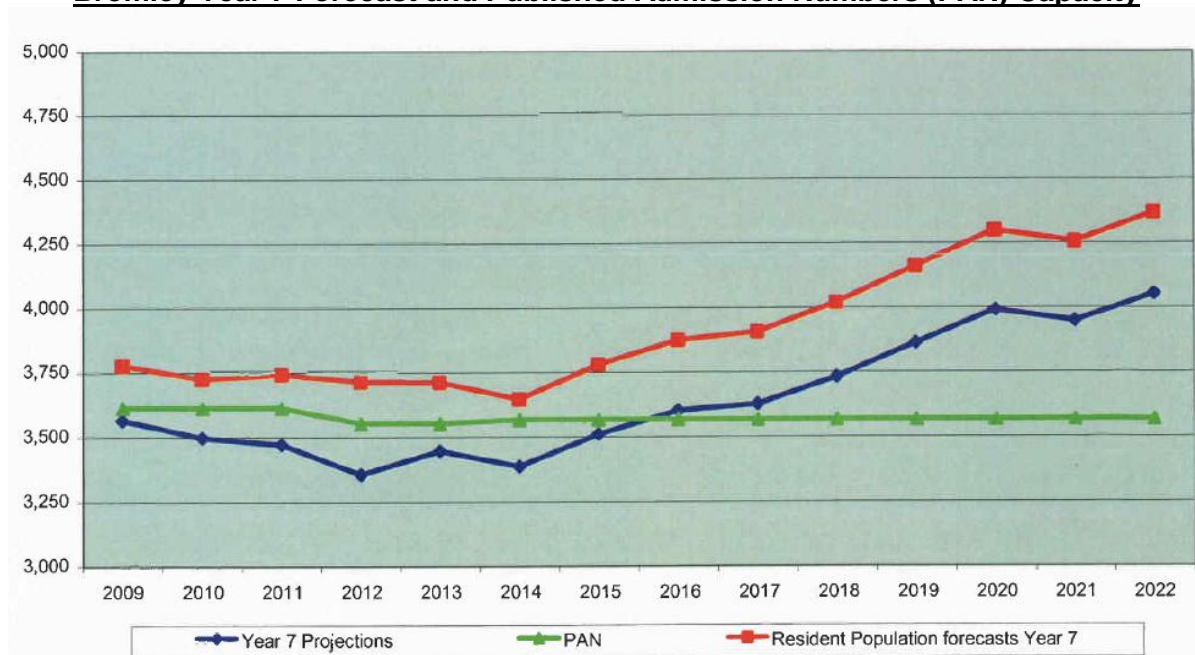
As a result of improvements in healthcare, and specifically maternity care, child survival rates are improving nationally. There has been, and is likely to continue to be, increased numbers of children with special educational needs requiring educational placements and specialist care.

Local trends

The increases in the birth rate since 2001 impact on services for children & families and have led to significant pressures in early years provision and the primary education sector. Secondary school pupil intakes are similarly forecast to increase throughout the plan period and are anticipated to become unmanageable by the end of the decade. Given current pressures for school places across London, the mayor has recently announced plans to set up a dedicated unit "New Schools for London" to help secure new sites for schools.

Secondary school catchments often extend beyond the boroughs borders. Additionally, information from the Department for Education suggests that, in terms of primary places, there will be greater growth in London Boroughs which border Bromley, namely Croydon, Lambeth, Southwark, Lewisham, Greenwich and Bexley. The Council anticipates that this will further increase pressure in those areas of the borough where there is greatest cross borough movement such as Beckenham and West Wickham.

Bromley Year 7 Forecast and Published Admission Numbers (PAN) Capacity



Special educational needs have historically been addressed in part through out-of-borough placements; however, proposals are being explored to enable provision in-borough. Provision over the plan period for increasing numbers of places will need to be addressed through the Local Plan.

The responses to the Core Strategy Issues Document consultation demonstrated residents concerns about the need to ensure sufficient school places in both primary and secondary sectors and highlighted local pressures. The Archdiocese of Southwark highlighted the currently vacant All Saints secondary school site, which lies within the Green Belt, and suggested that it offers potential for residential development. Bromley College indicated its intention to enhance the further and higher education it offers from two sites in Orpington Town Centre and Bromley Common (Green Belt) and requested supportive planning policies to facilitate improvements to their educational offer.

PREFERRED OPTION 39

To work with agencies and providers to ensure the provision of an appropriate range of educational facilities to cater for life long learning across the spectrum from early years to further and higher education.

QUESTION SET 2

Safeguarding education sites would enable the Council to make best use of existing education infrastructure resources and would be in line with the London Plan which advises "Land already in educational use should be safeguarded and new sites

secured to meet additional demands or changes in provision” (para 3.103)
Designating “Educational Land” would reflect approaches in neighbouring boroughs.

PREFERRED OPTION 40

Designate sites with education use, including schools, colleges and purpose built day nurseries, as “Education Land” and protect them for the period of the plan.

QUESTION SET 2

Current UDP Policy C7 permits new or extensions to existing educational establishments or pre school facilities provided they are located so as to maximise access by means of transport other than the car. In light of the continuing pressure on rolls it will be important to ensure this positive approach is maintained and where necessary to make additional new provision.

The Council seeks to accommodate children in primary schools in the locality in which they live. Current projections for primary schools show a projected shortfall of 13 forms of entry by 2017 concentrated in the centre, north and west of the Borough.

The Council is currently exploring opportunities for additional provision on existing primary school sites to meet this shortfall and a small surplus of places to facilitate pupil mobility and parental preference. Planning beyond 2017 is less certain, being dependant upon future births data, there may therefore be a need for additional primary schools later in the plan period. Secondary school pressures can be predicted over a longer period as the children progress through the primary sector. It is anticipated that an additional secondary school will be required by the end of the decade. The Council will ensure sustainable future provision through a proactive, positive and collaborative approach with providers.

PREFERRED OPTION 41

Assess pressure areas over the plan period and plan positively for proposals to expand existing provision and allocate new sites as required.

QUESTION SET 2

The NPPF attaches great importance to the meeting the educational needs of existing and new communities. The Council will encourage potential school proposers to consider locating schools in areas of the Borough with the greatest pupil demand to deliver sustainable education provision.

PREFERRED OPTION 42

Develop a criteria based policy approach to new sites which considers the “need” for the proposed provision and other policies of the Local Plan.

QUESTION SET 2

Options for Health & Healthy Environments

Context

The Health and Social Care Act 2012 changed the framework within which healthcare is delivered, with Clinical Commissioning Groups (CCGs), GP-led groups of doctors commissioning acute, community and mental health services, whilst a new National Commissioning Board (NCB) commissioning GP, dental, pharmacy and optometry services. The Act (highlighted in the London Plan draft amendments para 3.9) gives local councils an enhanced role in improving public health in their area, advising that the implementation of a joint health and wellbeing strategy (through the Joint Strategic Needs Assessment (JSNA) process) provides an opportunity to align strategies and programmes, including informing plan-making and development management.

The nature of provision of primary health care services has also evolved over recent years whereby a number of secondary health care services traditionally provided in hospitals are now being provided at the local level in health centres. National Guidance sets out a drive to bring 50% of outpatient and secondary care activity out of hospitals (acute care), including minor surgical procedures and treatments, therapies & diagnostic tests, and into community primary care settings.

There is considerable variation in the capacity of GP practices in Bromley, but GPs commonly work in smaller practices and with larger list sizes than the national average. More than a third of GP surgeries are not compliant with the Disability Discrimination Act, about half of which cannot be adapted to achieve compliance

Local trends

The draft Infrastructure Delivery Plan (IDP) highlights areas of current pressure and proposals for health facility development, namely in Bromley Town Centre, Orpington and Penge / Anerley. The nature of requirements over time will be indicated through the strategies of health service providers and the IDP review process.

Bromley's Joint Strategic Needs Assessment (JSNA) 2011 outlines the main issues relating to the life expectancy, quality of life and the wellbeing of the population as a whole and of people with specific needs. The Bromley JSNA 2011 concludes that

“key issues for further action are those which affect a large proportion of the population and where the situation appears to be worsening, these are:

- *Diabetes (for which obesity is a key risk factor)*
- *High blood pressure (Hypertension)*
- *Adult obesity*
- *Childhood obesity*
- *Anxiety / depression*
- *Dementia*
- *Support for Carers”.*

The responses to the Core Strategy Issues Document consultation flagged the importance of accessible health facilities, particularly with reference to public transport. The responses also emphasised the impact of the local environment, in particular appropriate housing on individual's health and wellbeing. Responses highlighted the need for new housing development to take account of infrastructure provision, including transport, shops, doctor's surgeries as well as the provision of green space, wildlife and recreation areas in order to promote health and well being.

PREFERRED OPTION 43

To enhance the health and wellbeing of residents; working with relevant health professionals to deliver good quality, accessible, health facilities to meet the needs of the community.

QUESTION SET 2

Whilst the availability of health infrastructure is an essential response to ill health, the immediate and wider environment impact significantly the individuals ability to remain healthy and to live lifestyles, for example, encouraging activity through a high quality pedestrian environment and public realm; through the encouragement of healthy modes of transport, and by ensuring built environments appropriate to peoples needs. The JSNA specifically flags the impact of appropriate housing on both physical and mental health. The nature of the environments in which we live, work and relax can therefore have a significant affect on health, notably obesity and anxiety / depression, in addition to the more obvious environment health impacts such as asthma and pulmonary (lung) diseases.

PREFERRED OPTION 44

To ensure that developments produce environments which support health and wellbeing and the impact of environments on health is acknowledged throughout the Local Plan, particularly in respect of:

- ***Housing***
- ***Transport***
- ***Built environment and public realm***
- ***Open Space***
- ***Recreation Leisure, Play and Youth***
- ***Climate Change***

OTHER OPTIONS CONSIDERED

The London Plan (Policy 3.2) advises that Boroughs should integrate health policies with planning, transport, housing and environmental policies. Whilst an overarching policy could highlight the impact of the environments on health, from the very local (housing conditions), to the global (climate impacts), it is considered important that the links should instead be highlighted throughout all the relevant policies of the Local Plan.

Option 45

Develop a single explicit policy relating to producing healthy environments.

QUESTION SET 3

Leisure and Recreation, Play and Youth

Context

The landscape in which sport and physical activity is delivered is rapidly changing with communities, voluntary clubs and individuals all taking a more prominent role. Particularly in straightened economic circumstances opportunities to support existing provision will necessitate working collaboratively with partners and local stakeholders to ensure the long term sustainability of sports and recreation facilities.

The vast majority of sports and recreational sites have open space designations. The NPPF advises that local planning authorities should plan positively to enhance the beneficial use of Green Belt, such as providing opportunities for outdoor sport and recreation (para 81).

The NPPF clarifies that new buildings in the Green Belt are inappropriate but that exceptions to this include the “provision of *appropriate* facilities for outdoor sport, outdoor recreation... as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it” (para 89) There has been a subtle shift from the former Green Belt guidance which limited such new buildings to “essential facilities for outdoor sport and outdoor recreation” which it defined as “small changing rooms or unobtrusive spectator accommodation or small stables”.

Local trends

The health and wellbeing of residents in Bromley is supported by a range of sports facilities, to which private clubs make a significant contribution. Pro Active South London, a partnership of organisations and individuals, co-ordinating the delivery of sport and active recreation across south London with Pro-Active Bromley co-ordinates and promotes the development of sport and physical activity in the Borough aims to increase participation generally and particularly engage young people.

There is good provision of parks across the borough however some lack the recommended quality of facilities and there are some areas outside the recommended 400m catchment for a local park.

The need for increased provision of facilities for children and young people is a recurring theme in consultations with the public, both to support the life opportunities for children and families and to divert young people from anti-social behaviour. Pro-Active Bromley Strategic Framework 2011–2016 indicates the development of a comprehensive facilities strategy Playing Field Strategy.

It will be important to ensure that new developments include the provision of amenity green space to address the needs of the projected future population.

The responses to the Core Strategy Issues Document consultation made an explicit link between health and the natural environment, with Bromley's green infrastructure having multiple functions, in respect of health, leisure and a quality public realm. Responses highlighted the need to enhance the provision of quality green spaces and enhance biodiversity to improve community cohesion, health and well being of residents. Open space and recreational facilities were valued for generating a sense of local identity, supporting leisure activities and community participation, particularly amongst young people.

A range of suggestions were put forward including

- the need for further youth provision
- a range of park improvements to enhance usage
- proposals for larger mixed use recreation developments on designated open spaces

PREFERRED OPTION 46

Encourage the provision of sports and recreation facilities in line with national guidance and local strategies, securing enhancement where appropriate opportunities arise.

QUESTION SET 2

Leisure facilities are under increasing funding pressure. The ability of existing sports and recreational infrastructure to meet the needs of a growing population and to remain sustainable will be dependant upon their ability to work in partnership with and attract funding from the private and voluntary sector.

The JSNA notes that numerous studies illustrate the direct benefits of green space to both physical and mental health wellbeing. The presence of green space also has indirect benefits, encouraging social contact and integration, provides space for physical activity and play and improves air quality. Small open spaces (below 2ha) include informal recreation spaces and green spaces and are an integral part of the local area, eg green spaces within estates. They enhance the appearance of residential and other areas and provide opportunities for informal activities close to home or work. The Mayor of London and CABI Space Guide to the Preparation of Open Space Strategies (2009) term such spaces, along with pocket parks (approx 0.4ha) as "Amenity Green Space". In Bromley such spaces are generally designated as Urban Open Space.

The Open Space Sport and Recreation Assessment recognises the community interaction benefits of small open space with residents identifying this type of open space as valuable to the local community, many consultees highlighting the role of smaller open spaces in defining the green character of Bromley.

The study illustrates the need for qualitative enhancements to sites and also highlights areas where new provision might be required. It highlighted that the quality of provision is significantly better in the west of the Borough than the east and that the quality of smaller spaces is much lower than that of larger parks.

PREFERRED OPTION 47

To protect valuable smaller open spaces. In addition to resisting the loss of Urban Open Spaces (UOS) develop policy to protect smaller open spaces where they make a contribution to the local community, and seek new provision in areas currently deficient in such spaces, including the contribution to children's informal play and recreation.

OTHER OPTIONS CONSIDERED**Option 48**

To determine applications on smaller non designated areas of open space on the basis of general design policies.

This approach would not adequately acknowledge the important local contribution made by many small open spaces, not only to the physical appearance & sense of place, but importantly to the physical and mental health of local residents.

QUESTION SET 3**Allotments**

Allotment gardens present opportunities for outdoor activity and healthy eating. In much of the Borough there are long waiting lists for a plot.

A call for sites may bring currently unused or underused private open spaces forward. The London Plan (Policy 7.22) encourages Land for Food, suggesting that as well as protect existing allotments Boroughs should identify other potential spaces that could be used for commercial food production or for community gardening, including for allotments and orchards.

PREFERRED OPTION 49

To explore the opportunities for allotments and seek to allocate additional sites.

OTHER OPTIONS CONSIDERED**Option 50**

To maintain the existing provision of allotments but not explore further opportunities.

Such an approach would not reflect the London Plan, which encourages boroughs to explore opportunities to make better use of open space for food production.

Vacant allotment sites have in the past been rationalised to provide enhanced allotment plots and benefits to the local community in terms of open space and housing. However, no option is proposed to release allotment sites for developments as this would conflict with London Plan Policy 7.22 which advises that existing allotments should be protected.

QUESTION SET 3

Burial Space

There are seven cemeteries in Bromley, six of which are owned by the Council. Whilst there may be capacity in Biggin Hill and Cray Valley for the next 20 years or so elsewhere in the Borough capacity will need to be addressed within the Plan period.

PREFERRED OPTION 51

To explore the opportunities for Burial Sites and allocate sites.

The use as a cemetery and related facilities “which preserve the openness of the Green Belt” are appropriate within the Green Belt and there is therefore potential to examine opportunities to address this future need.

QUESTION SET 2

QUESTION SET 4

Development Management Policies

“Supporting Communities” strategic options will be supported by a range of development management policies, likely to include the following:

- All new development to integrate and contribute to the creation of vibrant, sustainable communities
- Policy to support the needs of particular groups or communities and resist the loss of community facilities without appropriate re-provision (along the lines of UDP Policy C1) cross referencing policies related to Areas for Renewal (Living in Bromley section).
- Specific protections for facilities important to local communities,
 - a local community / corner shops,
 - b pubs,
 - c theatre & local arts.
- Policy regarding sites on the “List of Community Assets”
- Policy to maximise opportunities for community activities to develop by requiring vacant retail units to be marketed for community use before (along the lines of UDP Policy S5).
- Policy encouraging the cultural & leisure use of the public realm.
- Policy encouraging the provision of health and sports facilities.
- A criteria based policy seeking to resist the over concentration of hot food outlets
- Policy to require community facilities appropriate to the scale of new developments (along the lines of UDP Policy C2 and in line with the NPPF para 38),

- Policy seeking to resist the loss of education land and encouraging its effective use e.g. dual use encouraged (along the lines of UDP Policy C8). New buildings should be designed to minimise the loss of open space (subject to other policies of the plan e.g. impact on amenity).
- Policy encouraging additional public open space in areas of deficiency.
- Criteria based policy to protect small green spaces which are an integral part of the character of the local area, eg green spaces within estates.
- Policy seeking innovative approaches to greening existing spaces eg tree lining, green walls etc and requiring contributions to enhance existing spaces where on site provision cannot be made. (cross ref Bromley's Valued Environment and Environmental Challenges)
- Policy related to "Community Assets"
- Additional policies in response to Strategic Options.

Call for Sites

- Educational sites
- Allotment sites
- Burial sites

Getting Around

Introduction and background

Bromley's transport networks are related to the distribution of the population, with better access and choice in the more densely populated areas, access to public transport is still limited in the rural areas. There is generally good access to central London via the rail network, and westwards towards Croydon via Tramlink.

The main transport pressures in the Borough are:

- Peak time traffic congestion associated with journeys to work and education;
- Unacceptable overcrowding on rail links into central London during peak periods;
- High car dependency and high mobility amongst much of the population;
- Relatively low public transport accessibility predominately in the south (particularly for orbital journeys); including identified need to strengthen transport links with employment opportunities at Canary Wharf and in the City generally;
- Social exclusion amongst those without car access or unable to use public transport;
- Low levels of walking and cycling; and
- External impacts on the local economy (centralisation of shopping and services).⁹

The National Planning Policy Framework (NPPF) 2012

Local Authorities should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable¹⁰. *In line with the NPPF the Council will encourage development where there is a high level of accessibility as measured by PTAL level thus promoting sustainable transport by encouraging patterns of development that reduce the need to travel¹¹.*

The Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas¹².

⁹ Local Implementation Plan January 2012

¹⁰ NPPF para 17

¹¹ Statement of intent- formerly Option 3 DC July 2012

¹² NPPF para 29

Transport statements and Transport Assessments are still required for all sites that generate significant amount of movements and travel plans are still included and required¹³.

Specific parking standards have been removed with local authorities encouraged to consider the accessibility, type, mix, use, availability of public transport, levels of car ownership, and the overall need to reduce use of high emission vehicles if setting local parking standards¹⁴.

Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan¹⁵.

London Plan 2011 and Parking tables

Transport for London (TfL) expect all new developments to be in compliance with the maximum parking standards as set out in the adopted London Plan. For ease of reference the London Plan Parking tables have been reproduced below because they relate to Option 1 later in this paper:-

Designated Blue Badge parking bays recommended in BS 8300:2009			
Building Type	Provision from the outset		Future provision
	number of spaces* for each employee who is a disabled motorist	number of spaces* for visiting disabled motorists	number of enlarged standard spaces**
workplaces	one space	5% of the total capacity	a further 5% of the total capacity
shopping, recreation and leisure facilities	one space	6% of the total capacity	a further 4% of the total capacity
railway buildings	one space	5% of the total capacity	a further 5% of the total capacity
religious buildings and crematoria	two spaces or 6% whichever is the greater.		a further 4% of the total capacity
sports facilities	determined according to the usage of the sports facility***		

¹³ NPPF paras 32, 34, and 36

¹⁴ NPPF paras 39 and 40

¹⁵ NPPF para 124

- Parking spaces designated for use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get in or out of a vehicle and access the boot safely.
 - Enlarged standard spaces 3.6m wide by 6m long that can be adapted to be parking spaces designated for use by disabled people to reflect changes in local population needs and allow for flexibility of provision in the future.
- *** Further detailed guidance on parking provision for sports facilities can be found in the Sport England publication Accessible Sports Facilities 2010.

Parking for retail

Maximum standards for retail uses: space per sq m of gross floorspace			
Use	PTAL 6 and 5	PTAL 4 to 2	PTAL 1
Food			
Up to 500 m2	75	50-35	30
Up to 2500 m2	45-30	30-20	18
Over 2500 m2	38-25	25-18	15
Non food	60-40	50-30	30
Garden Centre	65-45	45-30	25
Town Centre/ Shopping Mall/ Dept Store	75-50	50-35	30
Notes: Unless for disabled people, no non-operational parking should be provided for locations in PTAL 6 central. Unless for disabled people, no additional parking should be provided for use classes A2-A5 in town centre locations. 10 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.			

Parking for employment uses

Non-operational maximum standards for employment B1: spaces per sq m of gross floorspace	
Location	
Central London (CAZ)	1000 – 1500
Inner London	600 – 1000
Outer London	100 – 600
Outer London locations identified through a DPD where more generous standards should apply (see Policy 6.13)	50 - 100
Note 20 per cent of all spaces must be for electric vehicles with an additional 10 per cent passive provision for electric vehicles in the future.	

Parking for residential development

Maximum residential parking standards			
Number of Beds	4 or more	3	1-2
	2 – 1.5 per unit	1.5 –1 per unit	Less than 1 per unit
Notes: All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Adequate parking spaces for disabled people must be provided preferably on-site 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future. The forthcoming SPG on Housing will include a table setting out a matrix of residential parking standards that reflect PTAL levels.			

All new development in the Borough is now (from April 2012) charged the Mayors Community Infrastructure levy of £35 per square metre towards the costs of Crossrail¹⁶.

The Mayor's Transport Strategy (MTS) encourages the provision of publicly available charging points for electric vehicles. However, the Mayor's strategy suggests that publicly available charging points should be no more than 1km (0.62 miles) apart, and it is not considered that this will be appropriate or practically achievable in some of the more rural areas of the Borough¹⁷.

There already exists a Mayor's Electric Vehicle Delivery Strategy 2009. In general compliance with the London Plan the Council's focus will be to concentrate initially on providing charging points in its car parks situated in the main town centres of Bromley, Orpington, Beckenham, Penge and West Wickham The London Plan has established new standards for the provision of charging points in new developments, which will be applied as appropriate through the development management process¹⁸.

Further regional getting around or access guidance is provided in 'Improving Walkability 2005', Manual for Streets 2, Accessible Bus Stop Design Guidance, and Wheelchair Accessible Housing Best Practice Guidance.

Local Objectives and current Policy

Bromley Local Implementation Plan (LIP) Objectives committed to deliver the Mayor's Transport Strategy (MTS)- 2011/12 to 2016/17

1. To reduce congestion on the road and public transport networks.
2. To maintain and enhance the economic and social vitality of Bromley's town centres, and in particular to support the implementation of the Bromley Town Centre Area Action Plan over the next fifteen years.
3. To enable a genuine choice of travel mode for all journeys, appropriate to the purpose and length of the journey being made.
4. To promote the safe use of cycling, walking and public and private¹⁹ transport to improve access to services, facilities and employment, reduce peak time congestion, improve journey times, and limit emissions.
5. To improve in-borough and orbital connectivity, and to secure extensions of the Docklands Light Railway and Tramlink into the Borough.
6. To enable multimodal journeys by improving integration and interchange.
7. To ensure that Bromley's streets and other public places are accessible, safe, clean, uncluttered and comfortable spaces for people.
8. To improve accessibility to all forms of transport for people whose mobility is impaired for any reason.
9. To reduce the number and severity of road casualties, with particular focus on collisions that lead to death or serious injury.
10. To improve the environment and reduce air and noise pollution.

¹⁶ London Plan 2011 Policy 8.3

¹⁷ Local Implementation Plan 2012

¹⁸ Local Implementation Plan 2012

¹⁹ Development Control Committee July 26th Minutes- Member request

11. To maintain the Borough's transport assets in a safe and serviceable condition.

It is intended that all these objectives will be delivered during the lifetime of the Mayor's Transport Strategy i.e. by 2031.

Bromley Town Centre Area Action Plan (BTC AAP)

The BTC AAP was adopted in 2010 and includes a parking policy that is relevant when considering the parking options for the rest of the Borough (see Option 1).

Policy BTC25 Parking

"Parking provision for non-residential development will be provided in the form of publicly available paid parking. A high standard of build quality and operational design (both for vehicles and pedestrians) will be expected for new car parks in the town centre, including personal security requirements. The Council will seek to reduce existing non residential parking provision where this is linked to the implementation of an approved Travel Plan. The levels of non residential parking should be consistent with the targets to reduce the level of single car occupancy journeys contained within the approved travel plan The Council will further develop and expand the Controlled Parking Zones around the town centre to mitigate the impacts of commuter and shopper parking. The Council will prioritise the use of on-street parking for shorter stays. Residents within opportunity sites will not be eligible to acquire Resident's Parking Permits to park onstreet. The Council will encourage Park & Ride operations to be developed. Implementation of an initial Saturdays-only Park & Ride will be investigated, based on the Christmas Park & Ride operation. The Council will support a full-time Park & Ride service, triggered by development in Phase Three, subject to further study, including identification of an acceptable permanent site with adequate environmental safeguards and a viable business case."

Local Issues and evidence

Transport is the main source of many "significant pollutants particularly in towns and cities...Land use planning is an important part of the overall transport policy package and can help in promoting more sustainable transport choices and reducing the need to travel"²⁰.

LB Bromley Local Plan Issues Document (2011)

The consultation raised the following issues:

- Can development be appropriately located to help reduce the need to travel, reduce road congestion and resolve parking difficulties?
- Can the parking difficulties created by commuting and increased travel be managed to support town centres and the quality of life of the Borough?
- Can accessibility to town centres, business areas, facilities and services be improved to meet changing demands?
- Can public transport (access) to employment areas be improved?

Some of the responses to the questions were not within town planning or development management control but other comments have led to options

²⁰ Air Quality and Land Use Planning DETR 2000

being devised (on the following pages) which would then lead to further Development Management policies being developed.

Bromley's Parking Strategy (Jan 2012)²¹

The parking strategy (previously drafted in 2007) aimed to update the Parking Enforcement Plan (PEP). The PEP set out reasons for introducing and enforcing on-street waiting and loading restrictions. The strategy also sets out policy background and seeks to explain “why” our parking service operates as it does along with briefly addressing some of the issues the service will face in the future. The policy objectives are:-

- To improve the safety of all road users.
- To provide sufficient affordable parking spaces in appropriate locations to promote and enhance the local economy.
- To assist in providing a choice of travel mode, and enable motorists to switch from unnecessary car journeys, to reduce traffic congestion and pollution.
- To ensure effective loading/unloading for local businesses
- To provide the right balance between long, medium and short stay spaces in particular locations
- To provide a turnover of available parking space in areas of high demand
- To assist the smooth flow of traffic and reduce traffic congestion
- To enable residents to park near their homes
- To assist users with special requirements, such as the disabled

Latest DLR evidence

The growing importance of extending the DLR to Bromley was recognised in the Mayor of London's manifesto pledge followed by the publishing of a pre-feasibility report on the engineering needs in September. The Council continues to lobby regional and local government for such infrastructure improvements and intend to carry out an economic appraisal in 2013.

²¹ Bromley Parking Strategy Jan 2012

General Getting Around Strategic Approach

Council priority will be to encourage development where there is a high level of accessibility as measured by PTAL levels; thus promoting sustainable transport by encouraging patterns of development that reduce the need to travel. Development in high PTAL areas shortens travel distances and makes the best use of available public transport capacity²².

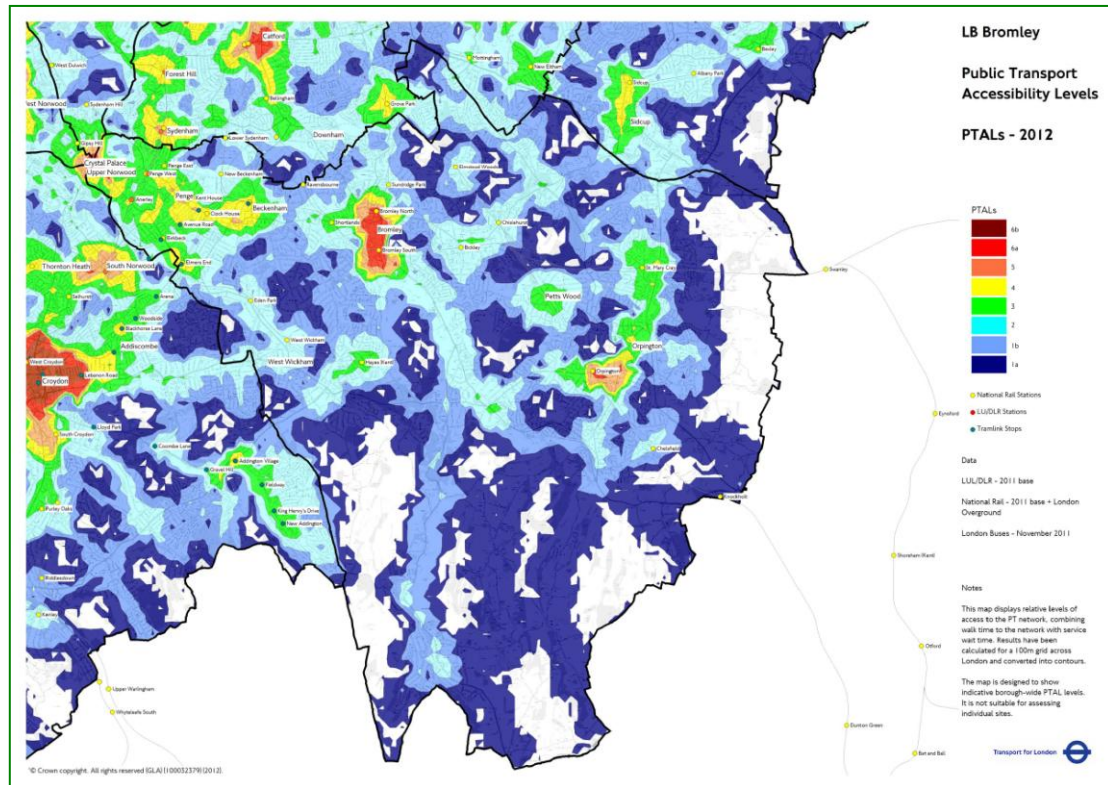


Figure 1: PTAL Map. Level 1a - 6b = low to high transport accessibility.

Getting Around development management policy areas

Traffic Management policy areas will be streamlined. This will include schemes that will be promoted to protect and enhance the local environment and particularly sensitive environments, in terms of historic buildings, conservation areas, and Air Quality Management Areas with regard to safety, noise, environmental impact and pollution²³.

Other policy areas will include:-Transport Demand, Assessment of Traffic effects, Park and Ride, Access for People with Restricted Mobility, Pedestrians, Cyclists, Other Road Users, Public Transport (*Planning obligations related*), Car Clubs, Public Transport *inc Travel plans, transport contributions and road hierarchy*, New Accesses, Residential Roads, Unmade Roads, Unadopted Highways, Traffic Management- *inc Home Zones*, Traffic Management and sensitive environments, and Servicing of Premises Road

²² Formally option 3, now a statement of intent following URS workshop Aug 12

²³ Formally option 9, now a statement of intent following URS workshop Aug 12

Safety. Following the options consultation new policy development for 'Parking', 'Relieving congestion', and 'Access for all'.

Strategic Getting Around Policy Options

Parking

The Council is concerned that new developments do not generate additional intrusive or obstructive on-street parking as a result of inadequate on-site provision. Therefore, it will use the limited flexibility provided by London Plan standards to maximise off-street parking where possible.

In addition, the Council believes that the PTAL system, on which the London Plan's parking standards are based, does not adequately address accessibility issues in outer London, but given the lack of a viable, cost effective alternative, reluctantly accepts it.

PREFERRED OPTION 52

Minimum parking expectation for residential development.

Apply minimum local parking expectation for residential development and the Council will also seek parking for all other uses to reflect the characteristics of the local area, including accessibility and in particular consider the impact on the environment, and congestion (to be devised as advised in the NPPF).

This option is in compliance with the NPPF and will take into account the accessibility of the site; the type and mix of development; local car ownership; and the need to reduce the use of high-emission vehicles.

OTHER OPTIONS CONSIDERED

OPTION 53

Maximum levels of parking.

Apply London Plan Maximum levels of parking spaces (London Plan Table 6.2).

This is not a recommended option because the London Plan levels do not reflect local expectation and circumstances. In particular, the use of the PTAL system does not adequately address accessibility issues in outer London.

However it is recognised that the SPG on Housing was produced in November 2012 states the Mayor has considered the scope for greater flexibility in different parts of London and that "outer London displays much more variation in the factors underlying NPPF parking policy.....greater flexibility is therefore required in implementing pan London parking policy there, and in particular, its associated parking standards"²⁴.

²⁴ Mayors Housing SPG November 2012 Annex 3 para A4

OPTION 54**London Plan parking levels**

Develop London Plan levels of parking?

This is not a recommended option because London Plan parking levels do not reflect local expectation and circumstances.

OPTION 55**Adopt Bromley Town Centre parking strategy (Area Action Plan policy BTC 25) borough wide.**

This is not a recommended option because the town centre has specific requirements and circumstances which do not apply to the whole Borough.

QUESTION SET 3

Relieving congestion

Bromley's residents continue to make on average 684,000 trips per day (2008/09), the fourth highest in London after Westminster, Camden and Barnet²⁵

Anticipated housing up to 2017 (Bromley Housing Trajectory) is split into two broad clusters, around Bromley Town Centre and Chislehurst, and in the north-west around Crystal Palace and Penge. These locations, combined with the focus of growth in Bromley Town Centre, mean that obvious transport implications for planned future development relate to increasing pressure on the road network and public transport services in Bromley town centre. The worst current congestion hotspots are focused on the town centre²⁶.

The Council maintains a list of traffic congestion "pinch points" on the road network as a means of identifying potential traffic schemes to reduce congestion. Subsequently allowing new development close to these locations could further exacerbate the conditions and potentially be counter-intuitive to the broader transport policies of the Council. Traffic congestion on the road network will impact on the ability of the economy to operate efficiently and the potential for people to work and live in the Borough.

In certain situations, mitigation measures could alleviate some of "pinch points" through engineering (e.g. increasing capacity) or through travel demand measures. In this case, new developments would be assessed on their individual case, considering the accessibility of the site; the type and mix of development, local car ownership and proposals for the "pinch point".

²⁵ Local Implementation Plan , January 2012

²⁶ Draft Infrastructure Delivery Plan August 2012

PREFERRED OPTION 56***Pinch point mitigation measures***

Require new major development close to known pinch points (or any new development close to significant pinch points) on the road network (identified in the Local Implementation Plan (LIP)) to incorporate mitigation measures to reduce congestion and the impact of the development on road congestions.

This option would allow developments which can contribute to the Borough while contributing to reducing congestion or undertaking measures to reduce the impact of the scheme or further exacerbating the pinch point.

OTHER OPTION CONSIDERED**OPTION 57*****Manage developments near Pinch Points***

Not allow development close to known pinch points on the road network.

This option could be very restrictive and potentially stop developments in these areas which, if designed with measures to reduce congestion and the impact of development may be acceptable to the Council. Additionally, at certain pinch points, the traffic congestion is due to traffic travelling through the Borough/area rather than local traffic.

QUESTION SET 3**Access to services for all**

Bromley's geography and southern rural areas make access to employment by public transport difficult. Bromley is ranked 30th across London for access to employment.

Some 90% of Bromley's population lives within 440 yards / 400 metres of a bus stop. The Borough's town centres and principal railway stations are relatively well served by buses (and for Beckenham, by trams), although services away from town centres and on Sundays are significantly less frequent.

Access to other services by non-private modes of transport is summarised in the following table, which also illustrates Bromley's ranking compared with other boroughs²⁷.

²⁷ Local Implementation Plan 2012

Service type	Rank in London (1 = largest mode share)
Primary Schools	31
Secondary Schools	30
FE Colleges	30
GPs	32
Food Shopping	25
Open Spaces	23

Of particular concern is access to GPs and schools. These figures highlight the need for inward investment to public transport services in the Borough.

The Council consult with organisations representing people with physical and sensory impairment on any design of major schemes and expect new developers to do so too.

PREFERRED OPTION 58

Developers to provide safe and accessible pedestrian and cycle routes within schemes.

To promote the safe use of cycling, walking and public and private²⁸ transport to improve access to services for all. Developers will be required to provide safe and accessible pedestrian and cycle routes within their schemes, and to public transport nodes, and local destinations such as schools, health centres and local shops and services.

This option builds on the principle set out in BTC24 and applies it across the Borough. “The Council will promote walking and cycling for shorter journeys. The Council will seek to improve facilities for pedestrians and cyclists, including safe and attractive road crossings, with a view to increasing walking and cycling. The Council will seek to ensure that the pedestrian environment is accessible to people with disabilities. Particular attention will be paid to all destination points including schools, employment etc.”

QUESTION SET 2

PREFERRED OPTION 59

Developer contributions towards cycle routes.

Give regard to increased demand for orbital and radial²⁹ cycle routes, requiring developments to contribute as set out in the forthcoming Council Transport Strategy and apply minimum cycle parking standards as per the London Plan (Table 6.3).

²⁸ Development Control Committee July 26th Minutes- Member request

²⁹ Development Control Committee July 26th Minutes- Member request

The vast majority of routes are linear towards central London; therefore, orbital routes are often limited in terms of choice and capacity. The Council is broadly supportive of the London Plan and TfL's aspirations for Cycle Superhighways. Taking this further, this option promotes orbital cycle-travel, the key to achieving a step change in cycling and which could also help reduce traffic congestion and relieve pinch points. Adopted cycle parking standards in the London Plan ensure adequate provision of appropriate facilities at new developments.

QUESTION SET 2

PREFERRED OPTION 60

Developer contributions towards transport services and interchanges.

Require developers, transport providers and operators to ensure accessibility to public transport services including public transport interchanges.

This option encourages access to services for all. Developers are required therefore to ensure that measures which promote or enhance accessibility to public transport services and interchanges are made.

QUESTION SET 2

PREFERRED OPTION 61

Public transport developer contributions

Encourage improved public transport routes and frequency with development contributing in line with any future Council Transport Strategy; in particular where public transport links do not exist or frequency is poor.

There are parts of the Borough, particularly in the south, and more rural areas where public transport is very limited. Improvements would be supporting better accessibility and assist quality of life. Contributions from developments could, therefore, promote or enhance the public transport offering, both in terms of frequency or destination.

QUESTION SET 2

OTHER OPTION CONSIDERED

OPTION 62

Major road building

Encourage a major programme of road building to increase capacity, requiring developers to contribute as appropriate.

This option is not recommended due to the high costs involved and the impact on development viability, the environment and likely opposition from local residents.

QUESTION SET 2

Public Transport Investment Priorities

The Council recognises the need for future investment in public transport infrastructure in order to continue to improve access to local jobs, supporting the needs for local businesses to grow and deliver regeneration.

The Borough has historically relied upon rail services to provide both short local journeys and longer-distance travel. The MTS forecasts that the Bromley rail corridor will be “moderately stressed” in 2017 and “highly stressed” in 2031 unless significant investment takes place.

The following options set out the possible investment opportunities in public transport for the Borough. In compliance with London Plan Policy 6.2 – providing public transport capacity and safeguarding land for transport, the options are to be designated and included in the emerging Local Plan. The Council also has the intention to safeguard the proposed DLR route and continue the safeguarding of the tramlink extension.

AMENDED PREFERRED OPTION 63

DLR Extensions

Promote the extensions of the DLR to Bromley North including by safeguarding sufficient land to enable construction and operation. In particular at former Bromley Town Centre Area Action Plan Site A.

This extension would support Bromley Town Centre and increase accessibility for residents to Docklands and other major employment centres as well the accessibility of Bromley as a destination, and reducing congestion on roads and rail.

Bromley Town Centre potential development opportunities should be reviewed in light of improved public transport accessibility with the extension of the DLR to Bromley North or Bromley South.

Ensure that the ‘Local Plan’ for former Bromley Town Centre Opportunity Site A reflects the potential and maximises the opportunities that the extension of the DLR would bring to Bromley Town Centre and the wider area.

QUESTION SET 2

AMENDED PREFERRED OPTION 64
Tramlink extensions

Support the Tramlink extensions to Bromley Town Centre and Crystal Palace, improving accessibility and orbital public transport routes to Bromley Town Centre.

This option provides economic benefit to Bromley Town Centre.

QUESTION SET 2

OTHER OPTIONS CONSIDERED

OPTION 65
Extension of the Bakerloo Line

Support the extension of the Bakerloo line to Bromley North.

This would not provide the same level of economic benefit to Bromley Town Centre.

QUESTION SET 2

OPTION 66
Overground rail linkages

Improving overground rail linkages between Bromley North and Lewisham.

Not recommended as this would impact on the case for DLR.

QUESTION SET 2

QUESTION SET 4

Bromley's Valued Environments

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 are conserved, whilst being carefully integrated within new developments to meet the needs of 21st 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. The strategy 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.

Strategic Policy Options

PREFERRED OPTION 67

Review and define all open space designations

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

PREFERRED OPTION 68

Once defined, in view of the importance of the designations, maintain and protect the open space

PREFERRED OPTION 69

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

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.

PREFERRED OPTION 70

Develop policies to improve use of and access to open spaces

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.

PREFERRED OPTION 71

Work with neighbouring boroughs to meet the London Plan policy objectives for open space

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.

PREFERRED OPTION 72

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.

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.

PREFERRED OPTION 73

Involve 'Park Friends' in the development of open space policies.

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

Strategic Policy Options:

PREFERRED OPTION 74

Develop policies for appropriate areas and buildings of importance to the historic environment to ensure protection and enhancement of distinctive parts of the Borough

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

PREFERRED OPTION 75

Maintain the existing criteria for Areas of Special Residential Character and add areas where existing criteria are met.

OPTION 76

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.

PREFERRED OPTION 77

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.

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 cover 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 and buildings in rural areas;
 - 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
 - Approach to tall buildings including locations where tall buildings may be considered appropriate and requirement to make a positive contribution to the existing character of the surrounding.
 - Listed buildings and locally listed buildings, including approach to demolition and protection.
 - Public realm and boundary treatment
 - Development and Management of Trees, Woodland Hedgerows.

- Development and SSSI, Nature Conservation, and Protected Species
- Biodiversity

Working in Bromley

The Working in Bromley chapter is split into two sections:

Part 1 - Business, Employment and Local Economy

Part 2 – Town Centres

Part 1 - Business, Employment and Local Economy

QUESTION SET 1

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.

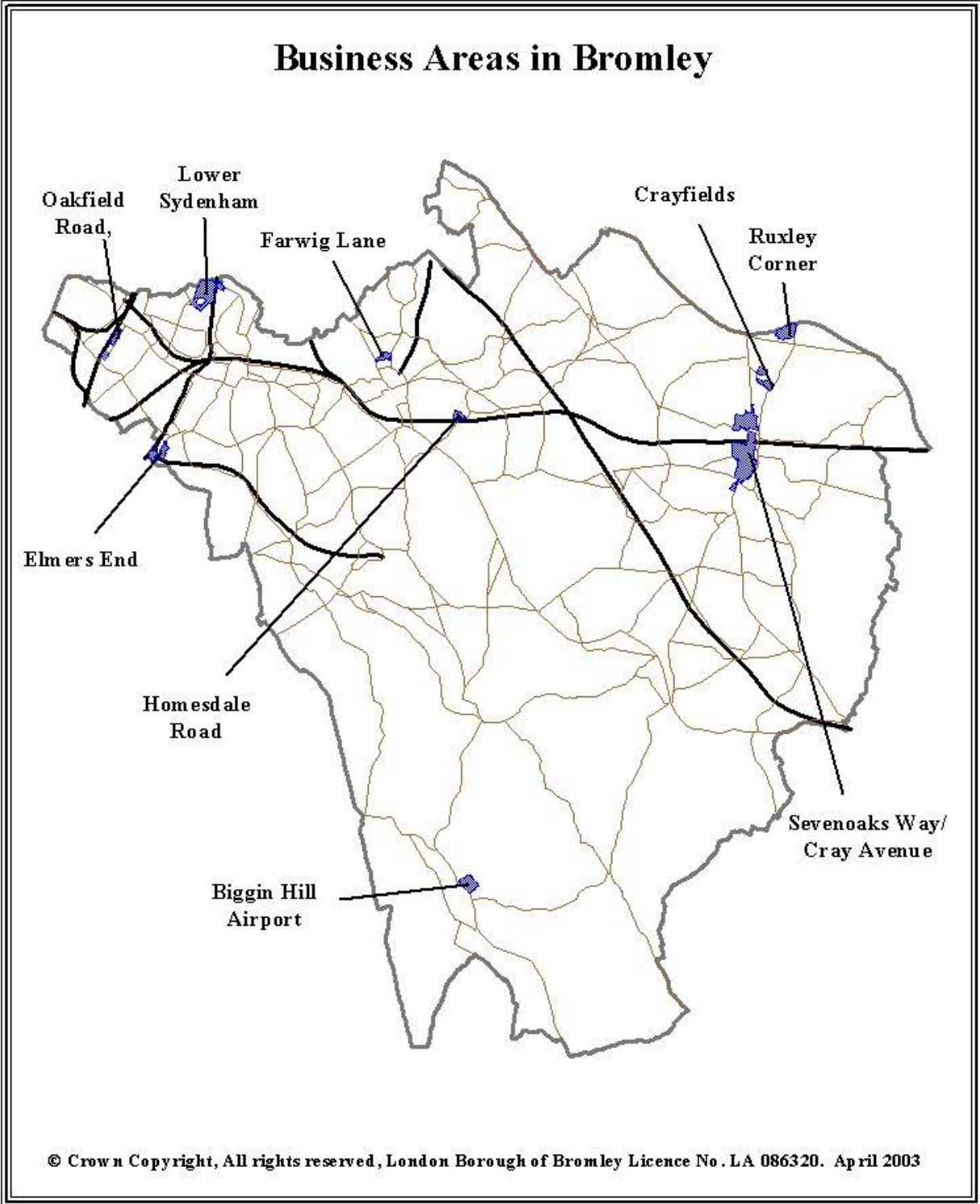
The borough's main employment centres are: Bromley Town Centre; the Major Town Centre of Orpington; the District Centres of Beckenham, Penge, Petts Wood and West Wickham; and the Business Areas in St. Mary Cray, Lower Sydenham, Elmers End and at Biggin Hill Airport.

Bromley Town Centre is the main location for the borough's office-based businesses, with approximately 200,000 sqm of floorspace, over one third of the total office floorspace in the borough. Orpington, which benefits from close links with the M25, has the next largest concentration with approximately 50,000 sqm. The remainder is mainly distributed amongst the borough's other District Centres.

Despite some decline of manufacturing employment in the borough, industry and warehousing remain important elements of the local economy. There are approximately 100 hectares of land in industrial or warehousing use, the majority being concentrated within the Business Areas in the Cray Valley, Lower Sydenham (Kangley Bridge Road), Elmers End and Biggin Hill Airport.

St Mary Cray is the largest of the areas with 40 hectares used for light industry or warehousing. It is the area with the best connections to the M25 and is the borough's prime location for such businesses. Both Lower Sydenham and Elmers End have relatively good connections to Central London. The Business Area at Biggin Hill Airport provides premises that benefit from close connections with the aviation industry and with air transport facilities.

Map of Business Areas



Policy Background

The National Planning Policy Framework (NPPF)

The NPPF emphasises planning's role in contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

Significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan proactively to meet the development needs of business. 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 purpose³⁰.

In drawing up Local Plans, local planning authorities should³¹:

- set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

London Plan (2011)

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

³⁰ DCLG (2012) National Planning Policy Framework, Paragraph 22

³¹ DCLG (2012) National Planning Policy Framework, Paragraph 21

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).
- Locally Significant Industrial Sites (LSIS).
- Other smaller industrial sites.

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.

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.

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).

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.

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 4.12 Improving Opportunities for all - Strategic development proposals should support local employment, skills development and training opportunities.

Local Issues and Evidence

A recent study undertaken by DTZ³² on behalf of the Council provides an evidence base for planning the borough's long-term future commercial requirements. 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.

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.

³² London Borough of Bromley Retail, Office, Industry and Leisure study (DTZ, 2012)
Working in Bromley

- 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.

The sectors that are set to grow the most in Bromley between 2006 and 2031 are Business Services, Financial Services, Construction, Health and Education and Hotels and Restaurants. Meanwhile, sectors forecast to lose employment include Manufacturing, Transport and Communications and Wholesale.

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. The DTZ study recommends protecting against loss to other uses existing employment land and premises in Bromley that meet the following criteria:

- Existing employment sites or premises that are within town centres. Bromley South represents the greatest opportunity to accommodate additional future development.
- Existing employment sites or premises that are suitable existing office locations outside town centres to provide both capacity for growth and choice for the market.

It is important to consider how best to protect the Business Areas and office accommodation for future business needs, whilst encouraging improvements to the existing stock and quality of environment. This will particularly require proactive activity to nurture growth of the office market in Bromley Town Centre over the short, medium and long-term given the highlighted anticipated demand for such floorspace.

The Bromley Area Action Plan identifies the need for at least 7,000 sqm of office floorspace. This presents a challenge in terms of provision for future growth and will need to be considered in the long-term context of the potential for the DLR to extend to Bromley.

The Cray Valley commercial corridor represents just over 50% of all designated Business Area floorspace in the borough. Such an agglomeration requires a particular focus to be directed towards the progressive upgrading of employment land in line with the SIL status, principally to provide modern industrial premises. This involves support of the intensification, and upgrading, of the area to meet expected future business needs, particularly the forecast growth in office ('B' use class) based employment.

The SOLDC status of Biggin Hill offers the potential for increased support of economic growth activities at Biggin Hill Airport and the adjoining industrial area. This would focus on aviation-related activities, with the provision of associated business infrastructure and amenities. It is important to note this employment growth would not increase the number of flights as per the existing lease arrangements and would have regard to the accessibility and environmental constraints.

The continued challenging economic climate presents real challenges, highlighting the need to continue to ensure Bromley achieves its vision through clear designations, identifying where growth and investment will be encouraged. Economic growth is

important to achieving the long term overall vision of Building a Better Bromley and the emerging Local Plan.

List of Evidence/Documents:

Economic Development and Employment Land Study, 2010, GVA Grimley

Market Demand and Feasibility Report, 2009, GVA Grimley

Retail Office Industry and Leisure Study, 2012, DTZ

Bromley Town Centre AAP, 2010

Land for Industry and Transport, Supplementary Planning Guidance (SPG) 2012, Mayor of London

London Office Policy Review 2012, Greater London Authority

Strategic Policy Options – Part 1: Business, Employment and Local Economy

(1) Strategic Industrial Locations (SIL)

PREFERRED OPTION 78

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.

This is the preferred option being in conformity with the London Plan (Policy 2.17 Strategic Industrial Locations) designation and reflects the borough's status as a 'restricted' borough for the transfer of industrial land to other uses. When considering alternatives to this option it is important to recognise the London Plan designation and therefore an alternative option is not proposed.

PREFERRED NEW OPTION 79

Increase the economic contribution of the Cray Business Corridor to the local renewal area and to the borough as a whole through improving the quality of the environment, review the boundary of existing designation and optimisation of sites.

The Cray Valley commercial corridor is identified as a SIL within the London Plan and is adjacent to two London Plan regeneration areas. The commercial corridor includes Sevenoaks Way/Cray Avenue (which represents over 40% of all designated Business Area floorspace in the borough), Crayfields Industrial and Business Parks, and Ruxley Corner Business Area. This corridor represents over 50% of all designated Business Area floorspace in the borough.

The Council need to ensure a suitable range of sites for businesses in terms of quality and size to meet the forecast growth. Modern businesses typically require a higher quality environment than traditional industry and this is one of the key challenges for the Cray Valley.

The 'Living in Bromley' section includes as a preferred option treating the Mayor's regeneration areas within the Cray Valley as a single renewal area, and the commercial area is important in helping to deliver economic, environmental and social improvements to this renewal area.

QUESTION SET 2

(2) Business Areas Designations

PREFERRED OPTION 80

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

This is the preferred option because it reflects the borough's status as a 'restricted' borough for the transfer of industrial land to other uses.

Option 81

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. This would involve releasing significant areas from business designation and evidence from the London Plan does not support this.

QUESTION SET 3

(3) Development Outside Business Areas

Option 82

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. "

This is not a preferred option because the approach to redevelopment or loss of non-designated employment land requires a more quantitative and qualitative approach based on clear criteria.

PREFERRED OPTION 83

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.

Although similar to UDP policy EMP5, this approach would be more detailed, for example, assessing 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 on 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. 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.

This is a preferred option because it acknowledges the criteria based policy approach that is consistent with the London Plan and Mayoral Supplementary Planning Guidance and reflects the varied needs of business.

Option 84

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 for the transfer of industrial land to other uses.

QUESTION SET 3**(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 borough is to accommodate this growth. Local research (DTZ, 2012) 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.

PREFERRED OPTION**Option 85**

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

Given the identified future requirements for office floorspace, it is therefore the preferred option to protect existing office floorspace in accessible locations as these are the most sustainable.

Option 86**Restrict new office developments to accessible (based on PTAL rating) town centre locations.**

This is not a preferred option because new small office developments based in the lesser accessible or non-town centre locations can fulfil a local need, which would provide sustainable employment opportunities.

Option 87**Allow office developments on employment land where PTAL rating and accessibility is deemed sufficient.**

This is not a preferred option because it prevents the clustering of similar and complementary businesses where appropriate and does not take into consideration demand for other land use types.

PREFERRED OPTION 88**Direct proposals for any large new office developments to town centres as part of the renewal of office stock.**

This is a preferred option because new large office developments are required to be located in sustainable town centre locations and will contribute to the renewal of office stock, increasing the attractiveness of the borough to businesses.

NEW PREFERRED OPTION 89**Seek the expansion and intensification of office use within Bromley Town Centre, particularly around Bromley South and Bromley North stations, supported by improved transport connections and recognition within the London Plan as an Opportunity Area.**

The employment land study shows a requirement for an additional 121,000 sq m of office floorspace for the period to 2031. Bromley Town Centre is key to achieving this. Other town centres together with the Business Areas will also play an important part accommodating smaller scale offices, and for the latter in particular, office use combined with other commercial uses.

Much of the existing office stock within the borough is dated and Bromley Town Centre offers the greatest potential for new high quality office development. Bromley South has the greatest scope, although Bromley North, with the possible DLR extension and the former Opportunity Site A is also important.

QUESTION SET 3**(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.

PREFERRED OPTION 90

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.

AMENDED PREFERRED OPTION 91

Realise the full potential of the Biggin Hill SOLDC and accommodate a feasible higher level of economic growth, reviewing appropriate constraints, such as accessibility, green belt boundaries and heritage designations while ensuring the environmental quality is maintained.

The GL Hearn findings identify scope for the intensification of the business and employment base in the Biggin Hill area. This is supported by the borough level employment forecasts and employment land study.

PREFERRED OPTION 92

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.

This option is preferred because it incorporates the planned heritage centre and supports a sensitive approach to the heritage constraints of West Camp.

OPTION 93

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

This is not a preferred option because it restricts the site to aviation-related uses only and therefore does not take into consideration the planned heritage centre.

PREFERRED OPTION 94

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

This is a preferred option because it maintains the important aviation-related uses hub at the Airport.

QUESTION SET 3

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:

- 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.

Part 2 – Town Centres

Introduction and Background

Bromley has historically been and still is the main retail centre for the Borough and its status is reflected in the London Plan. Bromley is the only Metropolitan centre, serving a wide catchment area and offering a high level and range of shopping, employment, service, community and leisure functions. The centre has a night-time economy of regional/sub-regional importance and has the potential to accommodate a wider leisure and cultural offer.

Metropolitan Centre (Bromley)

Bromley is the largest retail centre in the Borough and caters for the wider community in terms of retailing and leisure opportunities. Bromley is currently ranked 34th in the top 50 CACI Retail Footprint Index.

Major renewal of Bromley Town Centre is planned over the next 15 years, supported by £5 million of GLA 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 (AAP) for the town centre, which was adopted in 2010, is keen to ensure that Bromley continues to maintain its designated position in the retail hierarchy as a Metropolitan Town Centre and continue to make it a vibrant place where an increasing number of people want to live, work and shop.

To maintain and enhance Bromley's competitive position, the Council recognises that it is vitally important to invest in and improve the centre's facilities, infrastructure and retail offer.

Major Centre (Orpington)

Orpington High Street and adjacent Walnuts Shopping Centre contain a wide selection of high-street shops. There is a general market located in front of Orpington College, three days a week. Several out-of-town retail parks are located along Sevenoaks Way, Court Road and Cray Avenue. Knoll Rise is the main office location in Orpington and it is hoped this can continue to grow in the future. The Nugent Shopping Park comprises popular high street stores.

District Centres (Beckenham, Crystal Palace, Penge, Petts Wood, West Wickham)

The role and function of the Borough's five District Centres changes from centre to centre. Some centres have high footfalls during the day whilst some centres have strong evening economies.

Beckenham High Street is the third largest town centre within the Borough and it has an important evening economy. Crystal Palace (the area is shared with four other

boroughs), Penge, Petts Wood and West Wickham all have a good mix of chain stores (including supermarkets) and independent shops as well as pubs and restaurants and community and leisure facilities.

Neighbourhood & Local Centres Parades (Biggin Hill, Chislehurst, Hayes, Locksbottom, Mottingham)

The large number of neighbourhood centres and local neighbourhood parades fulfil a vital need for many residents particularly those without access to the car or cannot access large shops for health related reasons. Neighbourhood and Local centres provide local services in sustainable locations.

Individual Shops

As well as the Metropolitan, Major, District & Local Centres, the Borough also has a wide variety of local shops serving mainly residential areas. These shops are particularly important in rural areas and for people unable to reach larger centres.

Current Trends

The British Retail Consortium (BRC) has recently published evidence that over one-in-ten stores now stand empty on UK High Streets. The organisation's latest survey pegs national vacancy rates at 11.3%, up 0.4% month-on-month and is the highest rate since the BRC started compiling the data in July 2001. Records from the Local Data Company show that Bromley is performing better than the national average with a vacancy rate of 10.1% compared with the Great Britain average of 14.4%. (Source: Local Data Company).

Policy Background

The National Planning Policy Framework (NPPF)

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 with the exception of Bromley which is already contained in the Area Action Plan (AAP).

London Plan (2011)

Table A2.1 of The London Plan (2011) identifies Bromley as having high growth and for promotion as a commercial location and for the potential for additional public transport capacity. All five of the Boroughs District Centres are identified as having 'medium' growth where a moderate level of demand for retail, leisure/office are forecast.

The shopping hierarchy of the Borough's network of town centres has evolved over a considerable period of time. The table below sets out the position of town centres within the Borough.

Table 1: London Plan designations

Metropolitan Centres – Bromley
Major centres – Orpington
District Centres – Beckenham, Crystal Palace, Penge, Petts Wood, West Wickham

Local Issues and Evidence

DTZ Retail, Office & Leisure Study (March 2012)

A recent retail, office, leisure and office study undertaken by DTZ on behalf of the Council suggested there was room for additional retail floorspace in the years ahead. The larger town and district centres will act as the main focus for retailing, employment leisure and community facilities as well as housing as part of mixed use schemes. In all centres, it will be important that new development improves the streetscape and contributes to a high quality and accessible environment.

The table below sets out the capacity of comparison and convenience goods in the years ahead based on currently forecasting.

Net Additional Comparison Goods Floorspace Requirements (sqm)

Centres	2016	2021	2026
Beckenham	1,150	2,450	4,000
Bromley	10,700	23,100	37,700
Orpington	2,500	5,400	8,800
Petts Wood	650	1,450	2,350
Penge	1,100	2,400	3,900
West Wickham	1,250	2,700	4,400

Net Additional Convenience Goods Floorspace Requirements (sqm)

Centres	2016	2021	2026
Beckenham	700	900	1,100
Bromley	1,100	1,350	1,600
Orpington	300	500	700
Petts Wood	-	-	50
Penge	-	50	150
West Wickham	800	950	1,050

Based on the comparison and convenience modelling carried out by DTZ there is capacity for growth in every Metropolitan, Major and District Centre based on current forecasts with the largest growth being in Bromley Town Centre.

Local parades survey

Bromley produces a Survey of Local Parade Shop Frontages every four years. The last publication covered the period July 2010-2011. The next publication is due to take place in 2014 and thereafter be produced on an annual basis. Summary tables and pie

charts detail the percentages of retail and non-retail uses for each of the 73 local centres.

The retention and provision of small shopping parades and local shops will be promoted where they serve a local need. They can provide important and convenient facilities for 'top up' shopping and are of significant importance to those who have limited access to the larger centres across the Borough.

Mary Portas Review

The Portas Review: an independent review into the future of our high streets was published on the 13 December 2011. It set out what Mary Portas thought had led to the decline of the high street and made 28 recommendations about what could be done – by government, local authorities and business – to breathe life back into them. In light of the Mary Portas report a working group has been set up within the Council to assess the recommendations and how they can be applied to the various town centres within the Borough. Many of the issues highlighted by the Portas report recommendations will be taken up via the various town centre management and business improvement district initiatives.

Core Strategy Issues Document Responses

Various options were put forward in the Core Strategy Issues Document 2011. The main responses from the Issues Consultation are summarised below:-

- 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.

Strategic Policy Options – Part 2: Town Centres

(1) Making sure the Borough remains competitive relative to London and the South East

Additional retail floorspace will help improve the retail offer in town centre and help Bromley compete more successfully with nearby shopping centres. Bluewater and Croydon are Bromley's biggest competitors with Bluewater's expenditure for 2011 reaching £1,140million, Croydon £670million and Bromley £650 million. Bluewater has recently announced it is to increase the size of the centre's retailing and catering facilities by approximately 35,000sqm. Bluewater is also considering expanding its

retail offer with an extension to its facilities. Croydon also has plans for redevelopment of the Whitgift Centre which will increase competition.

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 £5 million of GLA 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.

Evidence produced for Bromley Council by CBRE shows that Bromley town centre dominates its own catchment, despite the presences of retail centres such as Croydon, the West End, Bluewater and Lakeside. Bromley retains 18.4% of market share from its catchment. This is particularly high given the level of competition across south London.

PREFERRED OPTION 95

Focus new development in the Town Centres and only allow out of centre development where it meets the criteria set out in the NPPF.

PREFERRED OPTION 96

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.

(2) Bromley Metropolitan Centre

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 Site G (Churchill Place) will provide the qualitative expansion of the prime retail offer needed to ensure the centres long term competitiveness.

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.

The Retail Policies for Bromley Town Centre are contained within the AAP which are still valid. Following a successful statutory challenge to quash the policy for AAP Opportunity Site A (Bromley North Station) the Council has been ordered by the High Court to prepare, publish, consult upon and promote an new policy the OSA site in accordance with the Town and Country Planning (Local Development) (England Regulations 2004). The key issues that need to be addressed in the reconsideration of the land use mix for the site included: Changes in national and regional policy affecting plan making since the adoption of the AAP in October 2010; An assessment of potential impact of an extension of the Dockland Light Railway south from Lewisham with a termination point at Bromley North; The future provision of offices floorspace; and the provision of community facilities. The review will afford the Council the opportunity to review with TfL and other transport operators the future planning for Bromley North Station with regards to DLR/Tramlink options, alternative bus station

layouts, rail head parking and general interchange requirements. This is seen as crucial as much of the viability arguments have been over the cost of the transport infrastructure dictating the level of the enabling housing development.

PREFERRED OPTION 97

To revisit the contribution Opportunity Site A (OSA) from the BTC AAP can make to the development of Bromley Town Centre

(3) Continue to develop and grow Orpington

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 was granted for a partial redevelopment of the Walnuts shopping centre to include a new 9 screen cinema with additional retail and additional restaurant uses.

PREFERRED OPTION 98

Encourage a mix of new retailers and businesses to the area to improve the overall offer for shoppers.

PREFERRED OPTION 99

Encourage more independent shops to set up along with continental markets as set out in the NPPF and Mary Portas review

NEW PREFERRED OPTION 100

Encourage the reuse of upper floors for both residential and commercial uses.

(4) Ensuring the Vitality & Viability of the Borough's Town Centres

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. Bromley, Orpington & Beckenham have the largest provision of pubs, restaurants and leisure facilities. All of the other District and Local Centres also contain a proportion of these facilities which the Council wishes to maintain.

In order to maintain the vitality and viability of town centres, government guidance recommends that retail floorspace is concentrated within the core of commercial locations and that other town centre uses such as leisure, offices and community facilities are allowed on the fringe of the core.

The Council also wishes to continue to promote Bromley's market as an essential part of the retail centre and encourage ancillary facilities.

Housing in the town centre along with essential community facilities and leisure developments is also part and parcel of attracting a mix of uses to a town centre alongside further retail expansion.

OTHER OPTIONS CONSIDERED

OPTION 101

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.

PREFERRED OPTION 102

To protect the retail function and broader role of the District Centres

PREFERRED OPTION 103

Explore options of extending the recreational and leisure offer available in District Centres

NEW PREFERRED OPTION 104

Define town centre boundaries for Metropolitan, Major and District Centres as per the requirements of the NPF and London Plan

(5) Ensuring 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.

Protecting retailing in core areas coupled with more flexibility in secondary areas is long established. The policies have been working well and are likely to be carried through to the new Local Plan. The local parades review study shows that the vast majority of parades are performing well. The Borough's town centres are relatively buoyant compared to other areas supporting a firm policy stance. Key frontages already contain established non-shop uses. A relaxation of policy would result in changes to the make-up of centres resulting in fewer shops and an increase in other uses including pubs, restaurants and cafes.

PREFERRED OPTION 105

prevent vacant units from staying empty by allowing a variety of use classes

OTHER OPTIONS CONSIDERED

OPTION 106

Aspire to maintain, promote and enhance all 73 local parades

OPTION 107

Remove local parade designations where all shop units are vacant or with non A1 use class

Development Management Policies

Indicative Development Management Policies will centre around the following topics:

Major, Metropolitan, Town Centres, District & Local Centres

Primary Frontages & Secondary Frontages

The Glades

Local Neighbourhood Centres and Parades & Individual Shops

Retail & Leisure Development

Food & Drink Premises

Re-use of upper floors above shops

Environmental challenges

More sustainable design and construction

Introduction and background

The National Planning Policy Framework (NPPF) sets out the general definition of sustainable development, and states the need for the planning system to contribute to the protection and enhancement of the environment by supporting the prudent use of natural resources and the move to a low carbon economy, amongst other tasks. It states that Local Authorities should set out local policies for tackling environmental issues including mitigating and adapting to a changing climate.

In addition to individual policies requiring certain environmental standards to be met – water usage, carbon reduction, etc - The London Plan also sets out the general principles of sustainable design and construction. It expects that planning applications should include information about what steps have been taken to reduce the impacts of the proposal. It suggests that boroughs may set local standards for sustainable design and construction using a nationally recognised assessment scheme, such as the Code for Sustainable Homes.

Local issues and evidence

The potential environmental impacts of development are an important consideration in any area, although the impacts themselves vary widely (equally, potential environmental impacts on development itself are also important). One of the key issues in Bromley, like the rest of the South East of England, is the significant pressure on water supplies and there is a key priority to make the most efficient use of this precious resource. The Environment Agency figures show that the average consumption of water per day in the Borough is well above the target set in the London Plan so it is important that any new development helps reduce water consumption. As well as issues of natural resources, the impact on the health and wellbeing of people living in Bromley can be improved or degraded by the quality of development. More sustainable design and construction needs to address potential problems of overheating, noise and air pollution to ensure more comfortable and healthy internal environments for both housing and commercial development.

The London Borough of Bromley currently considers major development proposals against the London Plan's sustainable design and construction policies. There is high variability within the information submitted, partly due to the individual nature of each application and key aspects of more sustainable design which are not required under Building Regulations are often neglected.

Strategic Policy Options

To be cost-effective and feasible, sustainable design and construction measures needs to be considered from the outset of any development proposal rather than

treated as an add-on once the design has been decided. Broadly, sustainable design and construction standards include measures to:

- Reduce carbon dioxide emissions
- Avoid internal overheating and contribution to the heat island effect
- Make more efficient use of natural resources, including water
- Minimise pollution
- Minimise the generation of waste and increasing reuse and recycling
- Reduce the impact of natural hazards such as flooding
- Ensure developments are comfortable and secure for users
- Use sustainable procurement
- Promote and protect biodiversity

Standards such as the Code for Sustainable Homes offer a way of measuring the likely impacts of these various aspects and publicly funded housing is already required to achieve a certain level (currently Level 4). Although there is a cost involved in the assessment, it is a nationally recognised system with considerable flexibility. Achieving a Code Level does not cover all possible environmental issues and it would not negate the need for the proposal to additionally consider other related policies such as a specific target of carbon reduction.

NEW PREFERRED OPTION 108

Proposals for development should include details about how all aspects of sustainable design and construction have been taken into account (in, for example, their design and access statement) and explain how this will reduce the environmental impact of the development and ensure it is environmentally resilient.

NEW OPTION 109

Proposals for major developments should reach a specified level of a nationally recognised standard (for example, The Code for Sustainable Homes) to show how they have addressed sustainable design and construction.

QUESTION SET 3

Energy and Carbon Management

Introduction and background

The Government and the GLA have highlighted the need for Local Authorities to tackle the challenge of increasing energy efficiency and reducing carbon emissions, with Planning having a key role to play. The National Planning Policy Framework (NPPF) emphasises this role, stating that Local Authorities should:

- adopt proactive strategies to mitigate and adapt to a changing climate
- actively support energy efficiency improvements to existing buildings,
- maximise renewable energy and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily
- consider identifying suitable sites for renewable and low carbon energy sources

- support community led initiatives for renewable and low carbon energy

The London Plan 2011 states that all development should make the fullest contribution to the reduction of carbon emissions and as such Local Planning Authorities should include detailed policies and proposals in their LDFs/ Local Plans. It sets out an approach towards “zero carbon” development with a policy which expects major developments to achieve an additional 25% reduction in carbon emissions on top of Building Regulations. This extra reduction steps up over time with the intention that all new residential developments should be “zero carbon” by 2016 and all other development by 2019. (See London Plan Policy 5.2)

The London Plan also prioritises the development of local energy networks where both heat and power can be supplied from a low or zero carbon source on site, or from an existing network nearby (see London Plan Policy 5.5, 5.6). The policy requires developers to assess whether this kind of decentralised energy network might be appropriate to their proposal and to make provision for connections now or in the future.

In order to help achieve the carbon reductions, it is expected that developments incorporate renewable energy where feasible, with an expectation that this would account for 20% of the carbon reduction. The London Plan expects Boroughs to develop more detailed policies and proposals to support the development of renewable energy and in particular, to identify broad areas where specific renewable technologies are appropriate.

Local issues and evidence

The latest Government statistics demonstrate that Bromley is a higher than average per capita Carbon Dioxide emitter in the domestic sector at 2.5 tonnes per capita, indeed Bromley has the highest emissions of the London Boroughs. Emissions from road transport are also above the London average due in part to areas with a relatively sparse public transport network. Any new development should therefore ensure it does not put further pressure on the congested road network.

Strategic Policy Options

Levels of carbon reduction expected from development

Currently, Bromley uses the policies in the London Plan which require residential developments of 10 units or more and other developments of 1000sqm or more (i.e. “major developments”) to reduce their carbon emissions by 25% more than the Building Regulations (this reduction increases over time as set out above).

Whilst keeping in general conformity with the London Plan, it would be possible for the Borough to develop more detailed or localised policy on carbon reduction in new development. A technical study would need to show what is likely to be feasible and financially viable in a range of development scenarios to provide evidence for such a localised policy.

PREFERRED OPTION 110

Major developments should achieve the minimum standards set out in the London Plan

OPTION 111

Local standards should be developed which respond to Bromley's particular local circumstances

QUESTION SET 3**Feasibility in different sizes and types of development**

In many cases, so-called "major" developments (10 residential units or more, 1000sqm non-residential) are able to achieve the target of carbon reduction set out in the London Plan policy but in some circumstances it is not practically feasible. The current policy takes account of feasibility and viability issues and these are addressed on an individual basis. It is likely that a greater carbon reduction (i.e. above the building regulations) is possible in some non-major developments but there are currently no policy requirements for this to be investigated. Where it is not practically possible to make reductions on-site, the London Plan suggests that a local policy may require an in-lieu payment to go towards reducing carbon through a scheme or project elsewhere. This would necessitate the development of project(s) to which the payment could be made, possibly through a local CIL scheme.

OPTION 112

All new development should be screened for the feasibility and viability of additional carbon reductions above the level set in Building Regulations

PREFERRED OPTION 113

Major developments (10 units residential, 1000sqm non-residential or mixed use) should aim to achieve a minimum additional carbon reduction in line with the London Plan policy.

OPTION 114

Where additional carbon reduction is not possible on site, an in-lieu payment should be made towards carbon reduction off site

QUESTION SET 3**Encouraging the development of local energy networks (decentralised energy schemes)**

Local energy networks can be a very efficient way of generating electricity and heat. Normally, large power stations lose the heat produced from the production of power but on a smaller scale this can be redirected through a network. Although the Borough does not have the extensive local energy networks as in the denser parts of London, there are some existing small schemes and these periodically require refurbishment, upgrading or may be subject to redevelopment.

Where development occurs and the proposed uses, or those nearby, indicate that a local energy network may be feasible, a new network could be established to provide more efficient and lower carbon energy and heat for that development and its neighbours. Where other smaller scale development occurs, it may be possible for it to connect to an existing network. The London Plan requires boroughs to help identify and establish decentralised energy network opportunities. Work has already taken place in the form of a “heat map” of the Borough which will help guide future development.

PREFERRED OPTION 115

All new development should investigate whether it can connect to an existing, local energy network.

QUESTION SET 1

PREFERRED OPTION 116

All major development should investigate the feasibility of establishing a new energy network or connect to and expand an existing network.

QUESTION SET 1

Incorporating renewable energy into new development

Use of renewable energy provides a significant opportunity to reduce carbon emissions and increase energy security. It can give householders and businesses the opportunity to reduce energy bills and can provide local employment opportunities. It is usually most effective and financially viable to design the production of renewable energy into a development from the outset so it is an important inclusion in a planning application. The London Plan has an expectation that all major developments seek to reduce carbon emissions by 20% by including on-site renewable energy generation wherever feasible. Together with efficiency measures this can make a significant reduction in the overall carbon emissions of a development.

Bromley has been applying the Mayor’s policy on renewable energy successfully on major developments across the Borough. A range of solutions have been adopted including both electricity and hot water producing panels, biomass powered boilers and heat pumps in the ground or air. When considered from the outset of a development proposal, these technologies have been successfully incorporated into the overall design without any additional impacts on the visual amenity.

PREFERRED OPTION 117

All major developments should include renewable energy generation on-site to account for a minimum of 20% of the total carbon reduction.

OPTION 118

Where major developments cannot practically include renewable energy on-site, a contribution should be made towards an agreed scheme of production off-site.

QUESTION SET 3**Improving environmental resilience****Flood risk**

Managing and reducing flood risk now and in the future is another important environmental challenge. The European Water Framework Directive sets the scene for improvements in flood risk management to which the UK have responded with several levels of policy and good practice. The National Planning Policy Framework (NPPF) technical guide includes the advice previously contained in Planning Policy Statement 25 (PPS 25) including the use of a sequential test when planning for development, to ensure that the most vulnerable land uses are appropriately sited.

The London Plan reiterates that development proposals must comply with the flood risk assessment and management set out in National policy and respond to Catchment Flood Management Plans (i.e. plans which may cover several Local Authority areas). Boroughs are advised to use Strategic Flood Risk Assessments to identify problem areas and develop actions and policy approaches to reducing risks.

A key issue in flood risk management is that the impact of any land use change or development may not be obvious around the development itself, but may have a significant effect elsewhere. This means that Flood Risk Assessments must demonstrate that the development does not exacerbate problems on site or downstream. Road and building configurations should ensure that any flow paths of flood water across the ground are maintained, or improved, and importantly not redirect the flow to other properties elsewhere.

Local Issues and evidence

The area covered by London Borough of Bromley has a number of challenges to meet when considering reducing flood risk. Flooding from rivers (fluvial flooding) is the main problem for some, while other areas suffer from occasional groundwater or surface water flooding – caused when heavy rain does not have time to soak into the ground. Data from the Environment Agency allows the mapping of areas most likely to flood from different causes and this information can help plan for the location of any vulnerable development in the future and show opportunities for improving existing problem areas. The Environment Agency states that in 2010 there were around 9000 properties at risk from flooding of some kind, although only 5% of these are considered to be at “significant risk”.

Bromley completed a Strategic Flood Risk Assessment (SFRA) in 2008 and data from the Environment Agency is regularly updated, forming a useful starting point for

the consideration of the location of development. The Preliminary Flood Risk Assessment (PFRA) has also been completed, giving an overview of the Borough's vulnerability to all forms of flooding. It estimates that future flood risk is potentially "high" in the Borough. Based on Drain London surface modelling outputs, it is estimated that approximately 20,410 properties could be at risk from flooding in a rainfall event with a 1 in 200 annual chance of occurring.

Strategic Policy Options

Flood Risk Assessments

Information about the potential for a new development to cause flooding is essential in reducing its risks. Below the Strategic Flood Risk Assessment for the whole Borough, site specific Flood Risk Assessments should be submitted with proposals larger than 1 hectare in Flood Zone 1 (the zone least likely to flood), all proposals in Flood Zones 2 and 3, and also for those areas identified by the Bromley (as the Lead Local Flood Authority) as Critical Drainage Areas. These areas will be identified in the forthcoming Local Flood Strategy. Flood risk may also occur in other situations but Risk Assessments are not mandatory in other locations.

PREFERRED OPTION 119

Flood Risk Assessments should be required in areas identified in the NPPF

QUESTION SET 2

PREFERRED OPTION 120

Critical Drainage Areas should be expanded to include locations with locally identified flood risk issues.

QUESTION SET 2

Sustainable Urban Drainage Systems

Planning policy must ensure that new inappropriate new developments are prevented in areas at risk of surface water flooding and that any proposed development is directed away from areas that are at higher risk. Where development is not inappropriate (i.e. it should not be in this location because of a risk of surface water flooding) a Flood Risk Assessment will show to what extent it may increase the risk of flooding. Surface water management solutions can then be incorporated through the use of Sustainable Urban Drainage Systems (SUDS). These are site specific schemes to delay and reduce the amount of water leaving a site, involving "hard" engineering and/ or soft landscaping, with the ideal outcome of reducing run-off to the rate it would be generated by an undeveloped greenfield location.

The London Plan states that developments should use SUDS unless there are practical reasons for not doing so, and presents a "drainage hierarchy " of the basic techniques that should be used from rainwater storage for later use (the most desirable) down to rainwater going straight into the sewer (the least desirable). Currently, technical advice on SUDS is available from the Environment Agency and

the construction industry but the wide range of scenarios and solutions can mean that in some cases the results are not well tailored to the site and are ineffective. Ongoing management of schemes is essential to their success.

PREFERRED OPTION 121

Require SUDS to follow the London Plan drainage hierarchy outlined in the London Plan or other latest guidance, and Environment Agency guidance

OPTION 122

Require SUDS that accord with locally established criteria to improve their effectiveness.

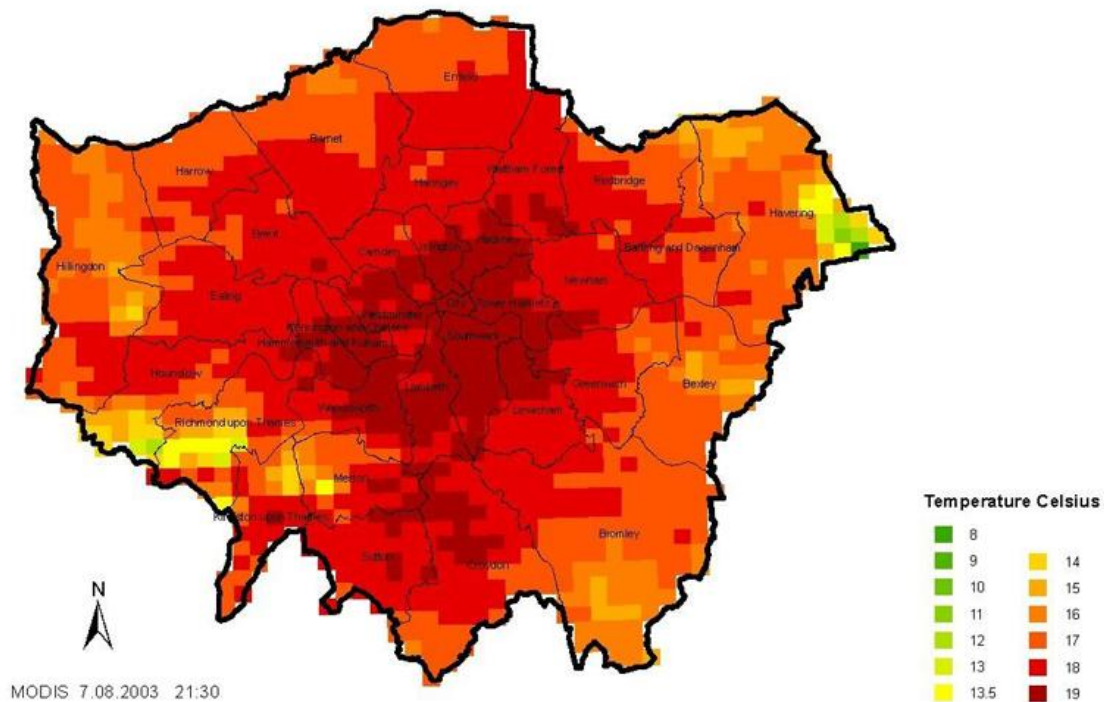
QUESTION SET 3

Overheating and Cooling

The London Plan strongly encourages development that avoids internal overheating, excessive heat generation and contributes to the prevention of further overheating, especially where the urban heat island is most intense. The Plan also expects that development proposals should reduce reliance on air conditioning systems. Proposals should demonstrate how the design, materials, construction and operation of the development would minimise overheating and keep a building cool through active cooling measures.

The 'Urban Heat Island (UHI) Effect' describes the increased temperature of urban and suburban air compared to the rural surroundings. The UHI is the result of the propensity of urban land surfaces, such as roads, buildings and pavements to absorb and retain more heat than rural areas. This can add up to 5-6°C to night-time temperatures which represents a significant danger to vulnerable people in times of heatwave. The north of the borough (and particularly the north-west) can already experience elevated temperatures because of the UHI effect and this situation is likely to be exacerbated by a) the changing climate and b) unsustainable development. It is therefore crucial that new development does not adversely increase the local UHI effect and is adapted suitably to remain thermally comfortable for residents (preferably without the use of artificial cooling).

Temperature distribution in London, August 2003



That LB Bromley has a large, growing elderly population, who are particularly vulnerable to heat-stress, means this issue of great local significance.

Strategic Policy Options

NEW PREFERRED OPTION 123

Developers should address the risks associated with a changing climate, as highlighted in the NPPF, The London Plan and The Mayor's Climate Change Adaptation Strategy, and investigate site-specific means of adapting to it.

NEW OPTION 124

Development should adhere to the design guidance published by The Mayor of London and the Chartered Institution of Building Services Engineers aimed at reducing the risk of overheating in new development.

QUESTION SET 3

Waste management

Introduction and Background

The continuing challenge to deal with the waste we produce can be tackled in a number of ways. Schemes to encourage people to reduce what they throw away and increase reuse and recycling can make a major contribution but space is still needed

to deal with managing the remaining waste and disposing of it in the least environmentally damaging way, taking into account the impact of its transportation.

National planning guidance on waste is still contained in PPS10 (which has not been superseded by the NPPF and is to be updated in a forthcoming National Waste Strategy) the focus of which is the waste hierarchy in which the most desirable option is to reduce waste, then reuse, recycle, produce energy from it and finally send it to landfill.

The London Plan upholds this hierarchy and encourages waste to be seen as a resource to be exploited for benefit rather than a problem. The options for dealing with waste are becoming more innovative and as more waste is separated at source, it can be reused and recycled more effectively. Tackling biodegradable waste has become a key priority with a target of none of this waste going to landfill by 2031.

In terms of land use, the London Plan focuses on increasing London's capacity for managing waste to increase self sufficiency and it recognises that there is need for flexibility in light of changing methods of waste management. Each London Borough must allocate sufficient land and identify existing waste management facilities to provide capacity to manage the tonnages of waste apportioned in the London Plan. Boroughs can pool apportionment requirements. Existing waste sites should be protected and used to the maximum, and if a site is lost an additional compensatory site provision will be required.

Local issues and evidence

As shown in the table below, the total amount of municipal waste produced in Bromley has been reducing and, importantly, so has the amount being sent to landfill. Increased recycling, incineration and composting have helped decrease the landfill quantity by almost 50% since 2007/8.

(amounts in tonnes)	2007/08	2008/09	2009/10	2010/11	2011/12
Total municipal waste	165,251	158,447	150,807	145,576	140,379
Household waste	143,996	137,214	132,076	126,992	120,325
Landfill	70,206	63,596	56,625	48,265	36,967
Incineration (waste to energy)	43,947	43,897	40,253	40,325	42,403
Dry recycling	39,743	39,292	39,839	37,860	36,836
Composting	9,837	10,604	13,301	18,453	23,329
Inert waste	1,529	1,058	788	673	843
Recycling rate	34.34%	36.36%	40.23%	44.34%	50%

Bromley does not currently have any sites within the borough for disposal, reprocessing of refuse or recycle. Operationally, Bromley therefore sends the material to a variety of processors in London and surrounding counties.

The mayor's waste apportionment requirements (which are described in the London Plan) require each borough to provide specified capacity for waste management. Bromley meets this requirement through its membership of the South East London Waste Partnership Group, which pools the capacity from 5 south-east London boroughs. In order to show how the apportionment targets are being met, the group of Boroughs produce a frequently updated Technical Paper which shows the capacity of each site in their area and the overall tonnages against the Plan targets. On the basis of this arrangement, Bromley does not have need of further capacity to meet the current London Plan target.

In terms of municipal waste sites in Bromley, a waste Transfer Station is an integral element of the Household Waste Recycling Centres at Waldo Road and Churchfields Road. In addition, planning permission has been granted to a third party for an Anaerobic Digestion plant (which processes organic waste into biogas, electricity, heat and compost) in the south east of the borough.

The introduction of a revised collection methodology in Bromley, incorporating separate weekly collection of food waste, means that the utilisation of this site by the council may be an attractive proposition.

The Borough will continue to resist where possible the need for Bromley to be a through-route for waste disposal.

Strategic options

Waste management capacity

The London Plan requires Boroughs to ensure that they retain and if possible increase their waste capacity. Currently, Bromley is meeting its requirements through pooling resources with other Boroughs and so the priority is to maintain its current facilities. It is acknowledged that whilst there are benefits in having the Waldo Road Depot in its current location in terms of waste collection, it also has limitations. In a recent study, alternative sites were not found but should one come up in the future, relocation – which must retain all the efficiency benefits and capacity of the existing site – may be an option.

PREFERRED OPTION 125 Retain and designate all existing waste management sites
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QUESTION SET 2

PREFERRED OPTION 126 Consider additional sites to increase capacity where feasible

QUESTION SET 2

Pollution control

Introduction and background

The National Planning Policy Framework (NPPF) acknowledges the importance of planning in creating secure and healthy places through the range of its different functions. The location of development and its design and quality can influence the quality of the air, noise pollution, light pollution and the condition of the soils and groundwater. Whilst the planning system cannot tackle all aspects of pollution it has an important role in collaboration with other controls and regulations to protect the environment and human health.

Having recognised the detrimental effect that it can have upon the health of the population, improving air quality is increasingly seen as a key environmental issue. The NPPF makes a number of references to air quality. It states that planning policies enable compliance with and contribute towards EU air pollution limits or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

At the regional level, the GLA recognises the importance of making the Capital a cleaner, healthier city and the London Plan states that Boroughs should have planning policies to help reduce pollutants and minimise public exposure. Local Plans should include policies to help reduce particular air pollutants identified in the National Air Quality Strategy. Similarly, the remediation of contaminated sites should be encouraged and local plans should set out policies to achieve this.

In terms of noise pollution, the NPPF states that planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. It should be recognised that while noise can have adverse impacts on health and quality of life, there is some development that cannot avoid creating noise. In these situations, existing businesses should not have unreasonable restrictions applied to them. Areas of tranquillity should be identified and protected to conserve their recreational and amenity value.

The Noise Policy Statement England sets out a vision to promote good health and a good quality of life through the effective management of noise. It introduces a method for assessing effects of noise based on a set of “effect levels” which relate to adverse effects on health. This kind of criteria based assessment could be used to develop local standards and trigger the point at which mitigation may be required.

Local issues and evidence

Although not always obvious, pollution of the air, water and land are ongoing environmental issues in Bromley which planning can influence and help improve. Fortunately, the majority of recorded incidents of pollution are categorised as being “minor”, but between 2005 and 2010 there have been some more significant cases. As well as discrete incidents of pollution which can be linked to particular events and

are usually limited in time, there are ongoing pollution issues such as air quality and contaminated land.

The Borough periodically reviews and assessed air quality within its area as part of the Government's National Air Quality Strategy. National air quality objectives (AQOs) have been designated for:

- Nitrogen dioxide (NO₂)
- Particulates
- Carbon monoxide
- Benzene
- 1,3-Butadiene
- Sulphur dioxide
- Lead
- Ozone

Following extensive air quality modelling Bromley, like many other local authorities, declared an air quality management area (AQMA) in 2007. The AQMA covers the North and North West of the borough and is in response of predicted exceedance in nitrogen dioxide levels. In 2010 Bromley subsequently published an Air Quality Action Plan detailing actions to tackle the air quality exceedances.

The demand for both new homes and protection of the open space means that previously used land – some of which will be contaminated – is the most developable area in Bromley. Where contamination needs addressing, due diligence is very important to ensure any required remediation does not make the planned project unviable. The old PPG23 required a Desk Study with any application where specific questions on the Planning Application are answered yes/no. The same guidance explained the requirements of each investigation stage as well as the roles of the regulator, developer and appointed consultant. Local policies will need to build on this previous document and also take into account other available guidance so that there is transparency over what is expected of developments.

Development Management policies

- Submission of information about sustainable design and construction with a planning application
- Submission of an energy assessment and strategy with a planning application
- Consideration of decentralised energy networks for electricity, heating and cooling
- Requirements for renewable energy
- Recycling of materials
- Control of the use of external cladding for increasing energy efficiency
- Reducing overheating and the need for powered cooling
- Inclusion of soft landscaping, green roofs and walls in and around developments
- Use of shelters and shading in the public realm
- Conservation of habitats, biodiversity and wildlife corridors
- Development of new habitats
- Use of water saving measures in new development to meet maximum standards

- Requirement for Flood Risk Assessments
- Use of Sustainable Urban Drainage Schemes (SUDS)
- Use of local CIL to contribute to larger flood risk and surface water management schemes

- Existing waste management sites should be designated and retained
- New waste management sites
- Recycling of construction material and site waste management plans
- Space for recycling in new development
- Reparation of aggregate sites

- Requirement for air quality assessments
- Proposals for potentially polluting development
- Reparation of contaminated land
- Control of noise pollution
- Ventilation
- Control of light pollution
- Hazardous substances
- Protection of groundwater zones

QUESTION SET 4