

Decision Maker: EXECUTIVE

**For Pre-Decision Scrutiny at the Renewal,
Recreation and Housing PDS Committee and Development
Control Committee**

Date: DCC: 26 July 2022
RRH PDS: 12 September 2022
Executive: 21 September 2022

Decision Type: Non-Urgent Executive Key

Title: BROMLEY TOWN CENTRE SUPPLEMENTARY PLANNING
DOCUMENT – CONSULTATION DRAFT

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Chief Officer: Tim Horsman, Assistant Director (Planning)

Ward: Bromley Town; Plaistow

1. Reason for report

- 1.1. This report recommends that the draft Bromley Town Centre Supplementary Planning Document (SPD) is published for 12 weeks public consultation. The SPD provides guidance to assist with the determination of planning applications in the Bromley Town Centre area, including guidance on design requirements.
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2. RECOMMENDATION(S)

For Development Control Committee members

- 2.1 That members endorse the draft Bromley Town Centre Supplementary Planning Document (shown at Appendix 1) and supporting documentation (at Appendices 2 and 3) for 12 weeks public consultation, noting that there may be further minor amendments prior to consultation.

For Renewal, Recreation and Housing Policy Development and Scrutiny Committee members

- 2.2 That members endorse the draft Bromley Town Centre Supplementary Planning Document (shown at Appendix 1) and supporting documentation (at Appendices 2 and 3) for 12 weeks public consultation, noting that there may be further minor amendments prior to consultation.

For Executive members

- 2.3 That Executive approve the draft Bromley Town Centre Supplementary Planning Document (shown at Appendix 1) and supporting documentation (at Appendices 2 and 3) for 12 weeks public consultation.
- 2.4 That Executive authorise the Director of Housing, Planning, Property and Regeneration, in consultation with the Portfolio Holder for Renewal, Recreation and Housing, to approve any further minor changes (e.g. related to formatting or mapping) to the draft Bromley Town Centre Supplementary Planning Document (shown at Appendix 1) prior to consultation.

Impact on Vulnerable Adults and Children

1. Summary of Impact: No Impact
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Transformation Policy

1. Policy Status: Existing Policy – document provides guidance to assist the implementation of adopted Development Plan policy set out in the Bromley Local Plan and the London Plan.
 2. Making Bromley Even Better Priority (delete as appropriate):
(3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
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Financial

1. Cost of proposal: Costs associated with publicising the draft SPD will be met from the Planning Policy and Strategy budget.
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Planning Policy and Strategy
 4. Total current budget for this head: £0.568m
 5. Source of funding: Existing Revenue Budget for 2022/23
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Personnel

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: N/A
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Legal

1. Legal Requirement: Town and Country Planning (Local Planning) (England) Regulations 2012
 2. Call-in: Applicable: Further Details – Executive Decision
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Procurement

1. Summary of Procurement Implications: N/A
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Property

1. Summary of Property Implications: N/A
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Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: the SPD will assist the implementation of Development Plan policies which seek to reduce carbon emissions.
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected): N/A
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Ward Councillor Views

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

3. COMMENTARY

Background

- 3.1 A report to Development Control Committee, Renewal, Recreation and Housing Policy Development and Scrutiny Committee (RRHPDS) and Executive in early 2020 set out the intention to prepare to produce a Supplementary Planning Document (SPD) to guide development in Bromley Town Centre¹. This proposed approach was agreed in April 2020².
- 3.2 A consultation exercise to inform the SPD was conducted between 15 July and 5 October 2020, seeking views on the future of Bromley Town Centre and what SPD should focus on. The consultation set out a number of key themes and related questions to focus representations. The consultation was conducted using Commonplace, an online consultation portal which includes the option of providing feedback using a mapping tool³ as well as via written response⁴.
- 3.3 Details of the feedback received during the consultation, and the response to this feedback, is provided in the consultation statement at Appendix 2.

Draft Bromley Town Centre SPD

- 3.4 The draft SPD (at Appendix 1) first sets out the relevant local, London-wide and national policy framework which underpins the guidance and describes the context of the area with reference to townscape, topography and other important considerations.
- 3.5 The SPD then sets out the following six design principles that are considered essential components in delivering good quality design, and which are widely documented (e.g. in Development Plan policy and national planning policy) as being among the key characteristics of successful well-designed places:
 - Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 3.6 These principles mirror the design principles proposed in the emerging Urban Design Guide SPD. Having these consistent principles threaded through the borough's planning guidance is important as it creates consistency and sets out clear design parameters which development proposals should consider from the very first stages of designing a scheme.

¹ 'TOWN CENTRE PLANNING POLICY STRATEGY: BROMLEY AND ORPINGTON', available from: https://cde.bromley.gov.uk/documents/s50080729/20200310114417_017114_0037666_Executive010420DRAFTTownCentrePlanningPolicyStrategyBromleyandOrpi%2018.pdf

² Statement of Executive Decisions on reports due to be considered at the cancelled Executive meeting on 1st April 2020 following consultation with PDS Committee Members, available from: <https://cde.bromley.gov.uk/documents/b50014566/Decision%20Statements%20Wednesday%2001-Apr-2020%2019.00%20Executive.pdf?T=9>

³ Details available from: <https://bromleytowncentremap.commonplace.is/>

⁴ Details available from: <https://bromleytowncentre.commonplace.is/>

- 3.7 The principles are supported by guidance notes which are a short summary of how the principles should be applied, and which cite specific policy and guidance which is relevant to the respective principles.
- 3.8 The SPD then sets out four character areas and eight sub-areas within them. These areas were derived from through consideration of the context of the wider area and represent those parts of the area which are considered to have similar characteristics. They are not intended to be finite boundaries; they are identified for the purposes of the SPD to set out relevant guidance applicable to each area. They have been drawn with deliberately 'soft' edges reflecting the fact that boundaries between character areas are fluid rather than 'fixed'.
- 3.9 There are a series of general guidance notes which apply across the character areas, relating to various topics including density, tall buildings and sustainability. For transport and connectivity, a map is provided at Figure 4 to show the location of potential new connections to improve connectivity across the town centre. It is noted that these routes are indicative and not literal; they do not indicate that buildings will be demolished to make way for new roads or paths, they merely indicate that where development comes forward, the Council would like to see connectivity improvements in these broad locations/directions.
- 3.10 More specific guidance is provided for each character area. This includes some key parameters to guide the development of specific sites in the areas (where appropriate) and the identification of potential development opportunities (including allocated and non-allocated sites). The character area guidance sets out detailed design considerations for the areas, including identification of relevant reference heights to inform the assessment of the height of proposals; details of specific public realm and green connections that should be provided; and, where appropriate, details of any prominent materials and design styles which could influence the style of new development.
- 3.11 Each character sub-area includes a plan of area which visualises the key elements of the specific character area guidance.
- 3.12 The guidance in the SPD has been developed by the Council's policy and urban design officers, with consideration of the national, London-wide and local planning framework, including the emerging emphasis on design quality in national policy. Some external urban design advice was sought to assist officers with the preparation of the SPD and consideration of the key issues in the area.

Next steps

- 3.13 If approved, the SPD will be subject to 12 weeks public consultation. The Regulations require a minimum of four weeks consultation; and the Bromley Statement of Community Involvement (SCI) specifies a minimum of six weeks. However, a recent consultation on the Orpington Town Centre SPD ran for 12 weeks, and because there are parallels in terms of the subject matter and scope of the documents, officers consider that a minimum of 12 weeks consultation should also apply to the Bromley Town Centre SPD. Officers will engage with the Council's communications team to ensure a comprehensive consultation exercise, modelled on the Orpington Town Centre SPD consultation.
- 3.14 Following public consultation, all representations will be considered, and, where necessary, amendments to the SPD will be proposed. An adoption version of the SPD will then be put forward for consideration by committees. The adoption of the SPD is a matter

for the Executive.

4. POLICY IMPLICATIONS

- 4.1 SPDs should build upon and provide more detailed advice or guidance on policies in an adopted Local Plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.
- 4.2 The Bromley Town Centre SPD provides guidance to assist with the implementation of the Local Plan, London Plan, NPPF and other documents. This includes guidance notes which translate these policy requirements and set out the Council's interpretation of these.

5. FINANCIAL IMPLICATIONS

- 5.1 The production of the Bromley Town Centre SPD and the costs of public consultation will be funded from the Planning Policy and Strategy budget.

6. LEGAL IMPLICATIONS

- 6.1 The draft SPD has been prepared in line with relevant planning guidance and regulations, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). If adopted following public consultation, the SPD will be a material consideration in the determination of relevant planning applications.
- 6.2 A Screening Statement to determine the need for a Strategic Environmental Assessment (SEA) has been prepared by officers, in accordance with the requirements of European Directive 2001/42/EC; and the Environmental Assessment of Plans and Programmes Regulations 2004; this is provided at Appendix 3. The screening has concluded that an SEA does not need to be prepared as the SPD does not introduce new policies but provides further guidance on adopted Development Plan policy. This policy has been sufficiently appraised in the Sustainability Appraisals of the Local Plan and London Plan documents; it is considered that the Bromley Town Centre SPD will not result in any additional significant effects to those already identified through these higher-level Sustainability Appraisals.
- 6.3 This approach is consistent with national planning guidance which states that SPDs are only likely to require an SEA in exceptional circumstances, where they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies.
- 6.4 There is a requirement to consult three statutory consultation bodies designated in the SEA Regulations (the Environment Agency, Historic England and Natural England) on whether an environmental assessment is required. Officers have consulted each of the three bodies on the screening statement provided at Appendix 3.

7. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

- 7.1 The Bromley Town Centre SPD supports the implementation of London Plan and Local Plan policies on carbon reduction. The SPD does not introduce new policy but will help to deliver existing policy in the Bromley Town Centre area and lead to positive outcomes.

Non-Applicable Sections:	IMPACT ON VULNERABLE ADULTS AND CHILDREN PERSONNEL/PROCUREMENT/PROPERTY IMPLICATIONS CUSTOMER IMPACT
Background Documents: (Access via Contact Officer)	Bromley Local Plan 2019, available from: https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan London Plan (adopted 2 March 2021), available from: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf National Planning Practice Guidance – https://www.gov.uk/guidance/plan-making The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - https://www.legislation.gov.uk/uksi/2012/767/contents