

The table below sets out the Bromley Liberal Democrats response to the Bromley Town Centre SPD. The response was not received during SPD consultation period due to a technical issue with the Council firewall which blocked the respondents email. At the meeting of Development Control Committee on 5 October 2023, members requested that the response was provided to Executive for information.

To note, the comments raise similar issues to those set out in the SPD consultation statement and officers do not consider that any further changes to the SPD are needed in response to the comments.

Bromley Liberal Democrat response	Officer comment
<p>Summary</p> <p>We love Bromley. We want Bromley Town centre to be at the heart of our community, our homes, our recreation; a commercial hub where small and large businesses can thrive. We believe Bromley does have an identity that is worth preserving and improving.</p> <p>Our Councillors must stand up for the best interests of local people, supporting positive regeneration plans which would enhance our town and resisting massive overbearing developments which would not. The SPD should help Councillors, officers and developers to do this by clearly setting out what is acceptable and what is not. We have a responsibility to current and future generations to safeguard what is good about Bromley and support developments that will enhance and improve our town.</p>	Noted
<p>Tall Buildings (SPD Guidance note 11)</p> <p>There is a lot of resistance within the local community at the recent influx of tall buildings. The development at St Mark's Square set a precedent, the development at Perigon Heights set another. The plans for yet higher towers, up to a whopping 28 storeys, on the Waitrose site is alarming. (Local residents and users of the town centre should comment on these plans urgently here - https://www.waitrosebromley.com/surveys/share-your-views).</p>	Noted
<p>Developers are commercial companies, they exist to make money and of course they want to achieve the best financial return from the sites they invest in. Inevitably this will mean some tall buildings, but we want the height of these buildings to be proportionate in the areas they</p>	See paragraph 6.16 and table 4 of the consultation statement

<p>are built. Using the “character areas” identified in the SPD, we would like heights limited as follows:</p> <ul style="list-style-type: none"> • Bromley North - we are broadly in agreement with the draft SPD of expecting developments from 4-8 storeys (the higher ones being nearer to the town centre) but there should not be any buildings that reach the height of Northpoint, which is itself out of keeping with the local area. Bromley North village is quite different - the SPD recognises the limited opportunities for development here and the need to recognise and preserve the historic nature of this part of the town. 	
<ul style="list-style-type: none"> • Bromley East - this area includes The Glades and Elmfield Road, and we know there are several planning applications for taller buildings here. While taller buildings are not out of context it's important that they don't overwhelm the nearby Palace Estate. We ask for a maximum height of 8 storeys along Elmfield Road, and nearer to The Glades that no buildings should be higher than the structure of The Glades and adjacent office blocks. 	<p>See paragraph 6.16 and table 4 of the consultation statement – similar points made in relation to the Mall site, and same points apply in response.</p>
<ul style="list-style-type: none"> • Bromley West - there should be no buildings higher than the Churchill Theatre. The SPD (7.20) says the height of new buildings should be “proportionate to” the theatre – this needs to be strengthened to say “no taller than”. We would also like to reinforce the protection for Library Gardens and Church House Gardens on any such development. 	<p>See paragraph 6.16 and table 4 of the consultation statement</p>
<ul style="list-style-type: none"> • Bromley South - there are already significant tall buildings in Bromley South, including St Mark's Square and Perigon Heights. We know there are plans for more tall buildings at 1 Westmoreland Road and on the Waitrose site. This area is evidence of the damage done to our town by the lack of a plan - idiosyncratic designs that bear little relation to the nature and appearance of nearby buildings. In terms of height we would urge that the SPD limits the height of future buildings in this area to be no bigger than the Churchill Court Building. 	<p>See paragraph 6.16 and table 4 of the consultation statement</p>
<p>Services - We would also like to see specific mention of the need for appropriate servicing areas/drop off zones for new builds for e.g. recycling and rubbish collections, shopping</p>	<p>Policy requirement set out in Local Plan and London Plan; with further guidance in the Urban Design Guide SPD. Not</p>

deliveries, to avoid congestion in neighbouring highways.	necessary to repeat these requirements in SPD.
Car and parking free development - we accept the principle within BTC that future residential developments would be expected to be car-free. However we feel special attention needs to be paid to the siting and accessibility of mandatory on-site disabled parking. Furthermore, even 'car-free' development will require attendance by service and delivery vehicles, carers and other essential visitors and developers should be strongly encouraged to make adequate provision on-site for such visits in order to avoid negatively impacting neighbouring highways and residents. The permanent abstention of parking permits for occupants of new, car-free developments should be strictly enforced.	Car-free does not preclude disabled parking or parking for delivery and servicing. Policy requirement set out in Local Plan and London Plan. Not necessary to repeat these requirements in SPD.
Housing (SPD Local Planning Policy) We recognise that there is an urgent need for more housing. We need the right homes in the right place, for those that want to join our Bromley community. We do not want developments that only target short term lets; we want to build communities. We particularly need truly affordable homes, including social housing, a range of housing suitable for people looking for their first homes as well as those looking for their last. The housing must offer good quality sustainable homes. And we must safeguard the quality of life of the current residents during the build of new developments by carefully managing construction noise, air pollution and disruption of neighbouring highways	The London Plan and Local Plan have policies concerning affordable housing, housing design and protection of amenity. Not necessary to repeat these requirements in SPD.
There is no specific reference in the SPD about provision for Bromley's ageing population. As the London Borough with a higher percentage of older residents than the average (23% of Bromley's population were over 60 in 2021 compared to 17% in London overall), there should be specific encouragement for suitable homes for those looking to 'downsize' when the family home becomes too big for them, but while they still enjoy a healthy and independent life.	The London Plan and Local Plan have policies concerning older persons housing. Not necessary to repeat these requirements in SPD.
Commercial Life (SPD Guidance Note 14) We support the promotion and continued enhancement of Bromley Town Centre as a major centre for commercial, retail, leisure and cultural activity. Central to such future provision	Noted

is, we feel, Bromley High Street, the Glades Shopping Centre, the historic Bromley Charter Market, Pavilion Leisure Centre and the Churchill Theatre and Library. These assets need to be protected.	
To this end we do not support any loss in provision of existing car parking spaces, whether within The Glades or the wider town centre, without careful assessment of the impact of such a policy on the attractiveness of Bromley as a 'leisure destination'. We would encourage initiatives such as a park and ride scheme and improved access to public transport, as the precursor to any loss in provision of car parking space within BTC. We would also like to see an increase in affordable electric car charging point provision within BTC.	<p>The SPD includes guidance for several development opportunity sites including the Glades, noting that loss of existing parking provision <i>may be acceptable, particularly where this would help to optimise the site for development of new uses and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.</i></p> <p>Policy on EV charging requirements is set out in the London Plan. Not necessary to repeat these requirements in SPD.</p>
We support the principle of The Glades and the High Street remaining as a predominantly retail area whilst also agreeing that there is scope for some diversity in commercial use. Within the High Street we agree that an element of residential use should be considered acceptable at upper floor levels of commercial buildings especially where such space is underutilised or can be enhanced without negative impact on the commercial offering or the quality of the resulting housing provision.	Noted
We support the concept of BTC as a key office location. The proximity of BTC to London and to regional transport hubs (rail, road and air) as well as its attractiveness as a place to work and live should make it a viable location for companies to locate and thrive. We appreciate that some of the current office space within Bromley will need to be enhanced and updated in order to adequately service the needs of modern working practices and future	Noted. The Local Plan and London Plan include a number of policies relating to sustainable design, which do not need to be repeated in the SPD.

<p>environmental legislation but would, nevertheless, advocate that where possible a 'retrofit first' approach be given priority. We agree that, in the event of demolition and replacement, proposed developments should be designed to allow for future social, economic and environmental change. Furthermore they must achieve high sustainability thresholds as well as incorporating measures such as green infrastructure which can assist in air quality, cooling and flood mitigation. In light of post-pandemic working practices we support planning guidance which encourages the provision of flexible, dynamic spaces which will allow both start-ups and more established companies to adapt and thrive within BTC.</p>	
<p>Character and Heritage (SPD Guidance note 9) The protection of BTC 'heritage assets' should extend beyond individual buildings, protected views and open spaces and acknowledge that they form a collective unifying impression of Bromley's historical importance as a formerly Kentish market town and now a suburb of London. The preservation of publicly owned land, local parks and heritage assets should be made a priority and in no part developed or disposed of without extensive public consultation and clear justification.</p>	<p>Disposal of Council land is not a planning matter. The SPD does identify the importance of local character and heritage, see Table 3 of the consultation statement.</p>
<p>The SPD should reference the guidance provided by Historic England on the many heritage assets in Bromley.</p>	<p>Not necessary for the SPD to refer to all potentially relevant guidance, see paragraph 7.3 of the consultation statement.</p>
<p>The referencing of the historic environment to enhance the aesthetic appeal of new developments, whether residential or commercial, is welcomed but concern remains that such measures may be negated by the excessive height, massing and density of new buildings, particularly in areas immediately adjacent to BTC conservation area.</p>	<p>Conservation areas are statutory designations that are taken into account in planning determinations. The Local Plan and London Plan have strong policies that seek to protect these areas. Impacts will be assessed on a case by case basis; a conservation area is not an in principle reason to suggest development is unacceptable.</p>
<p>Cultural Life (SPD Guidance note 1) When addressing the cultural life of BTC, we mean it to include places for leisure activities, sports, community assets, health and wellbeing,</p>	<p>Noted</p>

leisure centres, and places to visit during/after work.	
We consider the Pavillion Leisure Centre, The Churchill Theatre and Central Library as vital assets for the residents of BTC and the wider borough. They should form the central tenet upon which other cultural and leisure provision, both private and public, can be advanced. We would like greater recognition given within the SPD to the civic value which such cultural and leisure resources offer in terms of health and cultural wellbeing. Organisations such as charities, local community and special interest groups should be encouraged in their operation by planning policy and its implementation in order to enhance civil society and a feeling of 'belonging' for BTC residents.	This is eminently clear in the SPD vision. The SPD also has numerous references throughout to the importance of various cultural and leisure facilities.
Public Realm (SPD Guidance note 12) As stated within the SPD we would welcome further public realm improvements which improve pedestrian accessibility and offer more inclusive design. We agree that increased pavement activity and outdoor facilities linked to restaurants, bars or pubs are acceptable in principle. However, we think it important that all users of public realm space within Bromley are considered when examining how cultural and leisure provision can be encouraged through planning policy rather than allowing use to be primarily commercially driven.	Noted. The SPD does not limit consideration to particular public realm users.
We are pleased to see reference to exploring opportunities to improve connections from Queen's Gardens to The Glades and through to the High Street as we feel that this would greatly enhance connectivity within the town centre. We also agree that, given its central location within the conservation area, any partial or wider redevelopment of The Glades should reference key features of the conservation area.	Noted
Transport Connectivity and Accessibility (SPD Guidance notes 3 and 12) Good public transport, footpaths and cycle routes are vital to BTC in meeting its requirement of transitioning to a 'net-zero' location for work, retail and leisure. To this end we would like to see an improvement in the continuity and safety of pedestrian and cycle routes within and beyond the town centre in such a way as to encourage 'car-free' movement from	Noted

<p>out-lying areas into and out of BTC. We strongly support the concept of BTC being ‘people-focused’, where pedestrian movement is prioritised and visitors wish to linger. We would like to see this facilitated by wide walkways, dedicated disabled parking, pedestrianised zones and seating areas as well as a much better provision of clean, accessible toilet/baby changing facilities.</p>	
<p>Public transport - BTC is often referenced (in the SPD and elsewhere) as being an area with “excellent” transport links. It has links but not the capacity. The SPD fails to take into account the lack of capacity on the various modes of public transport at peak times - Bromley South is acknowledged to be the busiest station in the Southeastern network, recently Network Rail have had to remove seating from the London bound platform to ease congestion. Buses to Lewisham, Catford and Orpington are regularly full to the extent of being unable to pick up all the passengers waiting at the stops along the route. Improving, extending and evaluating public transport services and capacity must be an essential prerequisite of large developments.</p>	<p>See paragraph 6.31 and Table 6 of the consultation statement.</p>
<p>The SPD refers vaguely to maintaining and improving the links by rail from Bromley North Station and to the possibility of extending Tramlink (now called 'London Trams') into the Borough. There should be more detail about these plans, at least in outline. What plans actually exist? The SPD sets out a clear requirement for the development of Bromley North as a transport interchange.</p>	<p>This is beyond the scope of the SPD. The Local Plan sets out these aspirations but proposals would need to be led by TfL. As noted in table 6 of the consultation statement, the SPD references the updated Planning Obligations SPD which sets out requirements for obligations to secure transport network improvements.</p>
<p>Cycling - the SPD mentions “excellent” cycling connections - this is inaccurate. In fact it is widely acknowledged that connections are poor. The connectivity between cycle routes should be prioritised when safe cycle routes are proposed.</p>	<p>SPD mentions excellent general accessibility via various modes, it doesn’t specify cycling connections as excellent. The SPD does highlight increased connectivity improvements through linking existing routes.</p>
<p>EV Charging - this should be prioritised in all new developments.</p>	<p>Policy on EV charging requirements is set out in the London Plan. Not necessary to repeat these requirements in SPD.</p>

<p>Open Spaces (SPD Guidance note 7) Open Green Spaces – we support the need for all proposals to contribute towards improving access to green spaces for all. We'd like to see specific reference to areas that can be used for sporting activities.</p>	<p>Reference unnecessary as the Local Plan recognises multi-functional nature of spaces and has policy on sports and recreation.</p>
<p>As stated, the whole of BTC has a deficiency in access to nature and the eastern side of BTC has a deficiency of Local Parks (2 hectares or more). Therefore, we would strongly advocate for the retention of all current park space within BTC and the improvement of connections between the existing green space through better signposting, promotion, accessibility and an improvement in the provision of amenities to include public toilets/baby changing facilities.</p>	<p>This is already required in the Local Plan, London Plan and SPD.</p>
<p>We agree that opportunities to provide high quality public space should be prioritised in order to improve the appearance of BTC and experience of using such spaces. We agree with the London Plan that the best green infrastructure can play a vital role in helping the town centre to adapt to the challenges of climate change, as well as increasing much needed biodiversity and to this end agree that its use should be prioritised within BTC. Green infrastructure needs to be designed to be sustainable, adaptable to climate change and easily managed and maintained.</p>	<p>Noted</p>
<p>We strongly support the SPD statement that any development adjacent to the town's green spaces should play a vital role in enriching biodiversity whilst boosting access and connectivity to and through these spaces.</p>	<p>Noted</p>
<p>Civic Centre – (SPD Guidance section 8) - the plan for the Civic Centre refers to keeping existing public access open and the importance of suitable boundaries (although what the "suitable boundaries" are is unclear). However, the plan does not refer to the need to open up any space in this area at all in accordance with the aims of the plan itself in this respect. This seems an omission.</p>	<p>Disagree. The SPD refers to improved connections and enabling better integration with the town centre. SPD does not use the phrase 'suitable boundaries'.</p>