



# **Bromley Town Centre Supplementary Planning Document**

Regulation 12(a) Consultation Statement

August 2023

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# 1 Introduction

- 1.1 This Consultation Statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement accompanies the draft Bromley Town Centre Supplementary Planning Document (SPD). The statement sets out details of the consultation undertaken to inform preparation of the SPD.
- 1.2 Two significant consultation exercises were undertaken:
  - A preliminary consultation which informed the draft SPD.
  - A consultation on the draft SPD.
- 1.3 The statement sets out details of who was consulted as part of these consultation exercises; a summary of the main issues raised in each exercise; and a summary of how these issues were addressed.

## 2 Preliminary consultation information

- 2.1 From 15 July 2020 to 5 October 2020, the Council launched a consultation<sup>1</sup> using Commonplace, an online consultation portal. Commonplace allowed respondents to provide comments in response to specific themes and allowed comments to be submitted via a mapping tool (including the ability to pin comments to specific areas on the map).
- 2.2 Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's database.
- 2.3 The consultation sought views from a broad range of individuals and organisations on how the Council should guide the development of Bromley Town Centre.
- 2.4 809 representations were received; 781 were received online through the Commonplace portal, and 28 were received by email/post.
- 2.5 Public consultation is not a statutory requirement during the preliminary stages of drafting an SPD. However, public consultation at an early stage ensures key issues can be identified and reflected in the drafting of the SPD where appropriate.
- 2.6 The Commonplace consultation sought views on the following 10 themes, asking a range of specific questions on these themes:
  - Future of Bromley Town Centre
  - Housing
  - Transport and infrastructure
  - Offices
  - Retail, culture and leisure
  - Public realm, permeability and connectivity
  - Historic environment
  - Green infrastructure
  - Environment and air quality
  - Development opportunities
- 2.7 The Commonplace portal also provided the opportunity to make general comments (i.e. not in relation to a specific theme). The mapping portal allowed comments to be made in relation to specific points on a map of Bromley, and for others to agree with comments made. Whilst

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<sup>1</sup> Bromley Town Centre SPD, Commonplace webpage, available from: <https://bromleytowncentre.commonplace.is/>; and <https://bromleytowncentremap.commonplace.is/>

some use was made of the map and the 'agree' feature, the majority of respondents made their own comments under the various theme headings.

- 2.8 Several representations were also received in traditional letter/email format, chiefly from organisations and bodies.
- 2.9 Of the online responses (excluding the broad responses under 'General Comments') the 'Transport and infrastructure' theme received the most representations.

**Table 1: Response rate to Commonplace consultation, by theme**

<b>Specific Topic</b>	<b>Responses</b>	<b>% of Responses</b>
Environment and air quality	78	13
Transport and infrastructure	98	16
Green infrastructure	88	14
Housing	58	9
Retail, culture and leisure	55	9
Development opportunities	55	9
Historic environment	38	6
Public realm, permeability and connectivity	33	5
Offices	31	5
Future of Bromley Town Centre	84	14
<b>Total</b>	<b>618</b>	<b>100</b>

# 3 Preliminary consultation responses

- 3.1 This section sets out the key headlines of the responses received as part of the preliminary consultation between July and October 2020, including details of common issues raised. A detailed summary of the representations can be found at Appendix 1.

## General comments

- 3.2 A number of representations noted the need for future developments to be flexible and adaptable, resilient to changing circumstances but also able to respond to and support change; it was considered that the SPD should advocate such development. The importance of enhancing local character and local distinctiveness was highlighted in several comments. A number of responses suggested that the SPD should promote carbon reduction and active travel, and protect natural resources which could lead to increased use of sustainable transport modes and provide economic benefits for the town centre.

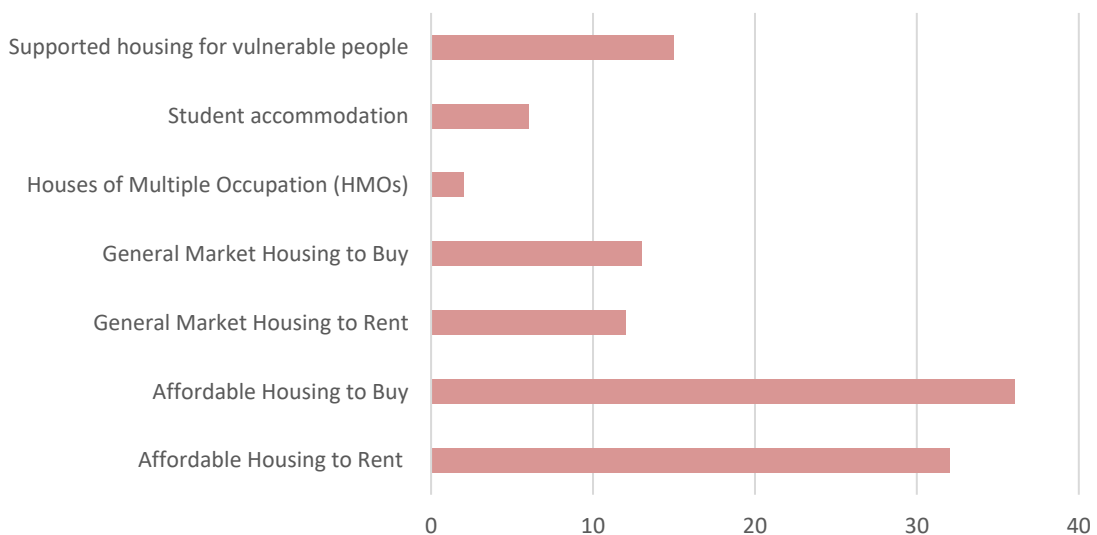
## The future of Bromley Town Centre

- 3.3 Numerous representations under this heading were also covered in more detail in the particular themes.
- 3.4 Representations suggested that there needs to be greater provision of higher quality, lower density development in the town centre.
- 3.5 There should also be better integrated transport systems such as cycle lanes, pedestrianised areas and car free zones to ensure that there is better accessibility for visitors. The support for a proposed Bakerloo Line Extension to Bromley came through as a strong theme.
- 3.6 The importance of sustainability was highlighted in a number of responses, to ensure that the town centre can become more environmentally focused through the promotion of sustainable travel and implementing an energy strategy to ensure that unnecessary lights are switched off overnight and providing more recycling and refuse facilities.
- 3.7 Flexibility was also a key theme. Retail/commercial, heritage, and community facilities have been highlighted as core functions of the town centre. Improvements to the high street that allow the local food market to thrive and provide better opportunities for start-ups and creative retailers to animate the night-time market were raised. The town centre should remain respectful to existing heritage assets. Community spaces and activities should be prioritised. The town centre should be accessible and safe for all, and various suggestions were made to improve social interaction and sense of community including a range of events and market activities.
- 3.8 General comments submitted have also highlighted the need for an enhanced communication system from the London Borough of Bromley to community organisations.
- 3.9 The importance of preserving and providing more green infrastructure was raised in several comments.

## Housing

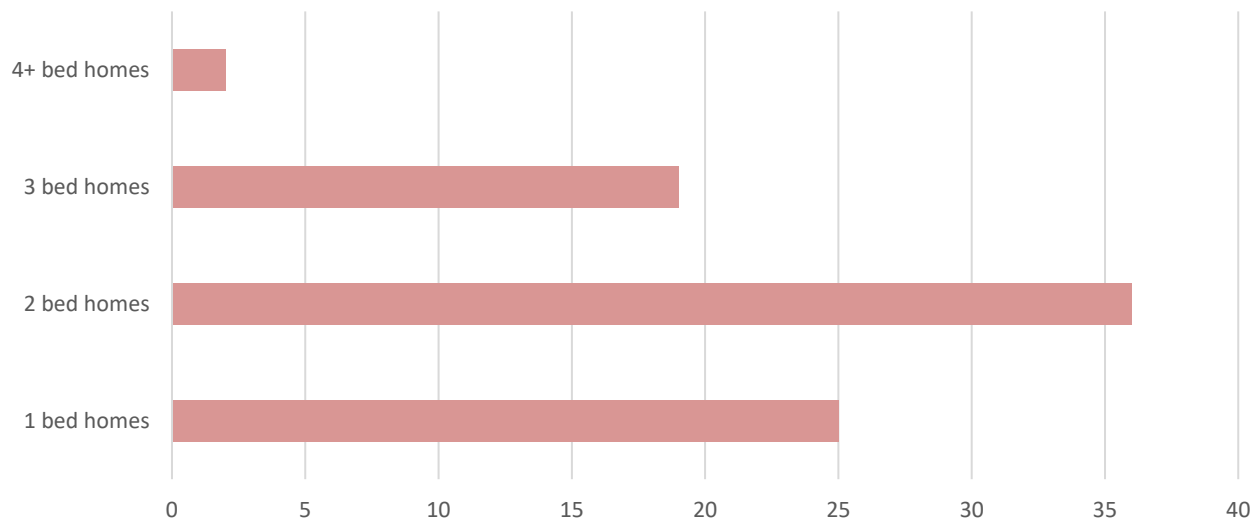
- 3.10 To best accommodate residential development within the town centre to complement the commercial role of the centre, it was suggested that the SPD should help identify massing opportunities and identify suitable building heights and design criteria to ensure no harm is done to protected character and appearance. This could be achieved by ensuring the Council has an allocation plan with criteria which embeds quality into development.
- 3.11 New developments should exceed minimum space standards and be sympathetic to the local area. Housing and commercial uses should be able to share spaces, with ground floors accommodated to businesses to make spaces open and connected.
- 3.12 Responses relating to existing vacant premises in the town centre suggested that conversions could provide valuable bedsits for homeless people or be provided as live/work centres.
- 3.13 The importance of supporting infrastructure for new homes was highlighted, notably transport and community infrastructure (e.g., health provision).
- 3.14 When asked what type of housing should be considered a priority, 31% of respondents thought that affordable housing to buy should be the most important. A further 28% thought that affordable housing should be prioritised as rented properties.

**Figure 1: Responses on priority type of housing**



- 3.15 74% of respondents thought that 1- and 2-bedroom properties should be prioritised in the town centre.

**Figure 2: Responses on priority size of housing**



3.16 In total, 58 comments were received referring solely to housing. It should be noted that housing has been referred to in comments set out in other themes. Most comments received were broadly in favour of residential development in the town centre.

### Transport and infrastructure

3.17 There was a general support and encouragement within the comments for a reduction in cars within the town centre, with considerable reference to pedestrianisation opportunities and alternative uses of current road space. There is also concern that the town centre has become too car reliant, leading to traffic levels which discourage public transport and cycling trips. Efforts should be focused on cyclists and walking as dominant modes of transport.

3.18 The need for an increase in active travel and improvements in public transport was also linked to concerns that existing infrastructure in the town centre is unsafe and inadequate and needs to be prioritised and re-established.

3.19 Comments also suggested that car parking in the town centre should be repurposed and reimagined to provide space for pedestrians, car clubs, secure cycling facilities and only keep car parking provision that is necessary.

3.20 Other improvements were suggested in the comments, such as agreeing to the Bakerloo Line Extension from Lewisham to Bromley and extending Tramlink and Docklands Light Railway. Bus connections could also be improved by linking up with the rest of the Borough, and increased frequency will encourage public transport use and reduce congestion.

### Offices

3.21 There was a strong emphasis on redeveloping vacant premises in the town centre into shared working spaces to help promote and support changing working habits and new businesses.

### Retail, culture and leisure

3.22 There was strong support for the Town Centre to diversify to respond to changes in the retail environment, as such there should be a strong focus on leisure and cultural facilities and existing facilities should be strengthened. Small independent shops should be encouraged to set up in Bromley.



- 3.23 Comments were split on whether the town centre was seen as somewhere to socialise. Developments should deliver and support new places that combine social areas with eating facilities. Comments suggested there needs to be a better zone for the night-time economy, it is too sporadic and strung out.
- 3.24 Comments noted the need to maximise the flexibility of retail space to be used as a variety of commercial uses to reflect the direction of travel set out in the emerging Planning White Paper, which encourages flexible commercial space through the new Use Class E.
- 3.25 Complete or partial pedestrianisation of the High Street was suggested. It will lead to a clean, litter-free, well-maintained environment with more inclusive family-friendly activities. There needs to be a lot more creative thought put into the current offering for the town centre to thrive. Bromley council needs to value and promote lifelong learning as an antidote to loneliness, isolation, and antisocial behaviour.

#### Public Realm, permeability, and connectivity

- 3.26 Comments included suggestions for public realm improvement such as pedestrianisation, links to parks, walking and cycling routes to the town centre, an increase in outdoor sheltered spaces, more place to sit and meet, remove barriers and provide step free access.
- 3.27 There was also support for the SPD guidance to ensure that existing infrastructure, such as the totem-pole lampposts, are no longer used as they are 'unpleasant and brutalist'.

#### Historic Environment

- 3.28 Respondents considered that the SPD should acknowledge the benefits of the historic environment and consider the impact that large developments will have on the local area. There were many comments supporting the notion that Bromley's unique character comes from the mix of historical buildings, green spaces, and architectural style and these should be preserved through SPD guidance.
- 3.29 Bromley Town Centre needs to better embrace its historic nature. Comments were in support of making information on the history of the town readily available to the public through notice boards and walking tours.
- 3.30 Whilst there was some support for high density development, there were suggestions that it should focus on refurbishment on existing vacant buildings and any new development should be limited to a certain number of storeys.

#### Green infrastructure

- 3.31 The importance of green infrastructure was highlighted throughout the responses and not just confined to responses to this theme. Emphasis was placed on the advantages, such as providing food and habitats for wildlife, cleaner air quality, and encouraging healthy behaviours.
- 3.32 There was a strong view that parks and green spaces should be protected, and green initiatives such as wildlife boxes, vegetable patches, trees, green walls etc should be encouraged within the local community to improve the public realm and feel of the town centre.
- 3.33 There were also suggestions that any new developments should not be allowed to impact on the open aspect of parks and gardens, so as not to spoil the green nature of the Borough.

#### Environment and air pollution

- 3.34 Comments generally sought a reduction in traffic along and around the High Street, with suggestions to reduce the speed limit to 20mph and discouraging unnecessary car use through the implementation of Low Traffic Neighbourhoods (LTNs). Incentives were also raised to encourage people who do not use public transport to switch to electric vehicles, encouraged by schemes that could give them free parking.
- 3.35 Improvements to the existing air quality were also frequently mentioned. Solar panels could reduce the energy carbon footprint of the town centre and businesses should be encouraged to conserve heat during winter months and not overuse air conditioning in the summer. The Council should also do more to encourage and incentivise businesses and households to become carbon neutral.

#### Development opportunities

- 3.36 The SPD should reinforce development to the south of the high street as a visual gateway and optimise the use of land and opportunity.
- 3.37 Bromley should be looking to present itself as an affluent and diverse borough by putting more effort into the town centre. Comments suggested that this could be done by encouraging low rise development and encouraging remote working hubs for local workers to improve the community feel.
- 3.38 The need for high quality design, in keeping with the surrounding area, was emphasised, along with retaining important parts of the high street i.e., the market.
- 3.39 Comments acknowledged that the historical culture of the town centre and pedestrianised high street and green spaces are integral to the character of the area. Any development proposed moving forward should be respectful to this.
- 3.40 Particular sites, such as East Street, Churchill Theatre and the Royal Bell were highlighted as the most characterful places in Bromley and should be the targets for conservation.
- 3.41 There is also concern that all existing Local Plan development Opportunity Sites by their location have serious and detrimental environmental impacts on the Conservation Area.

# 4 How have the issues raised in the preliminary consultation informed the draft SPD?

4.1 This section of the statement provides a summary of how the issues raised in the preliminary consultation have informed the draft SPD. Summary details are provided with reference to the structure and section headings of the draft SPD.

## Vision

4.2 Bromley adopted its Local Plan in 2019 with a vision for the Borough. The representations received helped to develop a Bromley Town Centre-specific vision for the SPD, in line with the Local Plan vision.

## Context

4.3 A strong theme coming through the representations was the importance of understanding the Bromley context. Therefore, having first set out the policy framework within which the SPD would operate, the SPD also addresses the context of Bromley, considering its townscape and growth over time, the topography of the landscape, the land use, scale and character of development, and local heritage and the green networks.

4.4 This contextual work informed the identification of the SPD character areas and sub-areas which are set out in Section 5 of the draft SPD with detailed guidance on each provided in Sections 6-9.

## Design Principles

4.5 It was very clear from the representations that the SPD should ensure the delivery good quality design. The SPD therefore identifies six overarching design principles addressing 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)

4.6 Further detail about the principles is set out in Section 4 of the draft SPD.

4.7 Guidance responding to the matters raised in the consultation is provided through the 'SPD guidance notes'; these guidance notes seek to address the matters raised in section 2 of this Consultation Statement and the appendix (where appropriate). Noting that the SPD cannot itself set policy, the guidance notes provide further guidance on relevant adopted Development Plan and national planning policies related to the six design principles, as they relate to the Bromley Town Centre area.

### *Guidance Notes 1 to 8*

- 4.8 Overarching Guidance Note 1 requires proposals to demonstrate how they have addressed the six design principles set out within this SPD and specific guidance relating to the character area within which they are located.
- 4.9 Guidance Notes 2 to 8 indicate in more depth how development proposals should respond to the individual Design Principles, addressing the general quality design issues raised in the consultation.
- 4.10 Guidance Note 2 relates to the Context Design Principle. The importance of protecting character and distinctiveness was an evident theme throughout the comments, although there were also a number of comments noting the need to diversify. Guidance note 2 sets out the importance of reinforcing local identity and a sense of place through strengthening existing physical, natural, social and cultural assets.
- 4.11 Guidance Note 3 relates to the Responsive Design Principle. Comments were made on design, particularly with regard to high quality housing. The guidance note emphasises the importance of high-quality design developed through a detailed process of review and collaboration.
- 4.12 Guidance Note 4 relates to the Connected Design Principle, which seeks to improve connectivity in the area and establish new routes that correspond with existing routes. Public realm and connectivity was a popular topic for comments, with responses noting the need for greening of routes and for improved connectivity and access for pedestrians and cyclists.
- 4.13 Guidance Note 5 relates to the Inclusive Design Principle, which pushes new development to achieve the highest standards of inclusive design, contributing to a built environment that is safe, accessible, and convenient for all. Accessibility came up in responses to a number of themes and was raised in conjunction with responses noting the need for safer and greener routes.
- 4.14 Guidance Notes 6 and 7 relate to the Healthy Design Principle, which prioritise the importance of health and wellbeing as part of the assessment of planning applications. Health came up as part of a number of comments, linked to air quality and comments noting the physical and mental health benefits of green infrastructure.
- 4.15 Guidance Note 8 relates to the Sustainable Design Principle, referencing key sustainable design policies to emphasise the requirement to achieve high sustainability standards. Sustainability was a common issue raised by respondents, particularly in relation to sustainable design, sustainable transport and the sustainability benefits of green infrastructure.

### Character areas

- 4.16 As noted above, the Bromley Town Centre context has informed the SPD character area boundaries. Guidance Notes 9 to 15 relate to general guidance that applies consistently across all character areas. Guidance specific to each sub-area is provided in sections 6 to 9 of the SPD (discussed below).
- 4.17 Guidance Note 9 relates to heritage and conservation issues, highlighting the importance of the historic environment in Bromley Town Centre which adds significantly to the character and distinctiveness of the area. The Guidance Note expects development proposals to clearly address heritage impacts. A number of consultation comments related to the historic environment; these responses highlighted the importance of local heritage in terms of its contribution to the area, and noted the importance of managing the impacts of development on local heritage assets, particularly with regard to tall buildings.

- 4.18 Guidance Note 10 addresses density, referencing the London Plan design-led approach to ensure the most appropriate form and land use for the site. A number of consultation comments across several themes raised the issue of density; some comments were supportive of increasing density but noted the need to ensure high quality design and provision of other benefits such as improved public realm and green infrastructure.
- 4.19 Guidance Note 11 sets requirements for the consideration of proposals for tall buildings in Bromley, in line with policy D9 of the London Plan. The guidance note references the importance of local views. The consultation comments on building height mainly focused on the need to limit heights; while the SPD cannot introduce maximum heights, it does set out the key policy requirements and provides guidance (in the character area sections) on what the Council considers to be appropriate heights.
- 4.20 Guidance Note 12 relates to Transport and connectivity in Bromley. It promotes enhancements to existing pedestrian and cycling routes and the creation of new routes, noting that improved east-west routes are a priority. The Guidance Note relates to a number of comments made across different themes.
- 4.21 Guidance Note 13 addresses green infrastructure and biodiversity in Bromley Town Centre. It promotes the enhancement of green spaces to address the identified deficiency of nature in the area. The importance of biodiversity was an issue that was raised across several comments.
- 4.22 Guidance Note 14 addresses sustainability concerns, reflecting adopted policy in the London Plan. Sustainability was a popular issue raised by respondents, with the encouragement of retrofitting also raised. The Guidance Note encourages retrofit and links with guidance for certain character areas with existing building typologies where a retrofit approach may be a practical proposition.
- 4.23 Guidance Note 15 relates to the new Use Class E and associated PD rights. The introduction of Class E and the PD rights post-dates the start of the consultation. While Class E does allow for some flexibility with town centre uses, it could affect the vitality and viability of town centres. Flexibility for commercial/retail uses was a common theme in the consultation comments. The Guidance Note will help to ensure that any adverse impacts of Class E and the PD rights are mitigated to protect the ongoing vitality and viability of the town centre.

#### Character areas and sub-areas

4.24 The SPD identifies the following character areas and sub-areas:

- **Bromley North**
  - Bromley North Gateway
  - North Village
  - North High Street
- **Bromley West**
  - High Street
  - Church House
- **Bromley East**
  - The Glades & Elmfield Road
  - Civic Centre/ Palace
- **Bromley South**
  - Bromley South

4.25 Detailed guidance is provided for the sub-areas, with reference to specific development opportunities where relevant. The guidance in the sub-areas links with a number of comments made in response to the consultation, particular on issues like design, green infrastructure and land use.

# 5 Draft SPD consultation information

- 5.1 From 28 October 2022 to 27 January 2023, the Council consulted on the draft Bromley Town Centre SPD.
- 5.2 The consultation was publicised extensively, as follows:
- The draft SPD and supporting documents<sup>2</sup> were hosted on the Council SPD webpage<sup>3</sup>, with a link from the main consultation webpage<sup>4</sup>. Comments were invited by email, in writing or via a questionnaire hosted on Survey Monkey.
  - The consultation was promoted in Council's digital newsletter (to 70,000 residents).
  - Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
  - Three Council news releases were issued - one at launch, one as a reminder three weeks before the consultation deadline, and one as a final reminder several days prior to the consultation deadline. These news releases were also shared with the Business Improvement District (BID), community groups and residents associations, who were encouraged to circulate to their members.
  - Social media posts scheduled between the news releases from the Council's accounts, using graphics created to promote the consultation.
  - Three digital posters created to display on the digital advertising screens in the town centre. Copies of the posters were also distributed to local libraries and the Glades shopping centre.
- 5.3 188 representations<sup>5</sup> were received in total, as follows:
- 122 via email
  - 66 responses submitted via the Survey Monkey questionnaire on the Council's website
- 5.4 108 respondents (57%) could be identified as living in the Bromley Town Centre area (within BR1 and BR2 postcode areas).
- 5.5 The Council wishes to thank all respondents for taking the time to respond to the draft SPD. All comments have been considered and have helped to inform the final SPD. Section 6 of this document summarises the comments received, while Section 7 provides the Council's response to the comments.

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<sup>2</sup> Supporting documents were a previous version of this consultation statement (detailing the information in sections 2 to 4, and appendix 1) and a Strategic Environmental Assessment screening statement.

<sup>3</sup> <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

<sup>4</sup> <https://www.bromley.gov.uk/consultations>

<sup>5</sup> Some respondents submitted representations via different formats, e.g. email and survey. The total figure excludes this double counting, but it is noted that all comments submitted were assessed in detail (as set out in sections 6 and 7 below).

## 6 Draft SPD consultation responses

- 6.1 This section sets out the key headlines of the responses received as part of the draft SPD consultation between 28 October 2022 to 27 January 2023, 188 consultation responses were received via email, in writing and via a questionnaire on Survey Monkey.
- 6.2 The issues raised by the respondents have been grouped into the following topics for the purpose of this consultation statement (NB: some respondents raised commented on more than one topic). Comments which did not fall under these topics are discussed in the general comments section.
- 6.3 Section 7 sets out the Council’s response to the issues raised in paragraphs 6.4 – 6.73.

**Table 2: Response rate to draft Bromley Town Centre SPD consultation, by topic**

Specific Topic	Number of responses to respond to this topic	% of responses to respond to this topic
Design, character	134	71%
Tall buildings	131	70%
Conservation, heritage	92	49%
Transport	45	24%
Social infrastructure	11	6%
Housing inc. Affordable Housing	33	18%
Environment and air quality	69	37%
Commercial uses (retail, leisure, office)	29	15%
Public realm, permeability and connectivity	35	19%

### *Design, character*

- 6.4 Many respondents commented on the need to retain the character of Bromley Town Centre. Comments referred to Bromley being historically a market town, unique in that respect in south and south east London. Some respondents were very concerned that recent developments and future plans risk destroying this character and ruining the area; examples of recent development in Croydon and Lewisham were given as something to avoid.
- 6.5 Several respondents noted that recent developments have maximised development; a change to optimising development, sought by the London Plan, was supported.
- 6.6 Some respondents considered that the character area maps are poor quality.
- 6.7 Sport England suggested that the SPD include reference to Active Design.
- 6.8 “Retrofit first” – reusing and refurbishing existing buildings where appropriate - was supported by a number of respondents. One respondent asked whether retrofit investigation should be a stronger requirement.



- 6.9 The Metropolitan Police's Design out Crime officer notes that the town centre has higher crime than neighbouring wards and other town centres. The SPD should include Secured by Design concepts.
- 6.10 A local group noted that a masterplan is needed for Site 10. This should be done by the Council, not a developer.
- 6.11 Several respondents raised concern about fire safety with tall buildings – an incident at St Mark's Square was cited as justification for restricting tall buildings.
- 6.12 Several respondents suggested that any further external development of the Glades would be inappropriate; they considered that existing development was detrimental, robbing gardens of light in winter, and the Italianate garden has been lost to the development of under-used units. Only limited architectural enhancements to the Glades should be permitted.

### *Tall buildings*

- 6.13 A number of respondents considered that tall buildings are not suitable for Bromley Town Centre and are particularly inappropriate near to the Conservation Area and other heritage assets. Respondents considered that tall buildings could have a negative Impact on Church House Gardens, Library Gardens and Martin's Hill, causing over-shadowing and ruining views across the valley.
- 6.14 Respondents suggesting setting limits on heights as the SPD guidance notes seem to give licence to create buildings that are too tall.
- 6.15 Several respondents including a local group stated that visual and heritage impact assessments should be done before any heights are established in the SPD; guidance note 11 should be amended to reflect this.
- 6.16 Comments were provided in relation to height guidance for specific development opportunities:
- With regard to Site 10 generally, respondents expressed concern that the guidance paves the way for very tall buildings, and considered that existing and proposed tall buildings should not set a precedent.
  - In relation to 1 Westmoreland Rd, a respondent noted the local impact of tall buildings on low rise residential uses close to the site, including on the operation of solar panels.
  - In the Bromley North Gateway sub area, several respondents considered that the heights of development on Site 2 should be determined by the impact on views and the Conservation Area, not by reference to Northpoint House which predates the designation and is detrimental. Respondents also stated that any development over 3 storeys would have negative impacts on the nearby low-rise residential area – over-shadowing, lack of privacy and security and the effect on house prices.
  - Conversely, developers and landowners of the Site 2 believed that the height parameters are too strict. The attempt to arbitrarily restrict heights and development capacity is contrary to D3 of the London Plan and the Local Plan site allocation, and a tall building is appropriate on this site. The respondent also considered that the site does not need to reference Northpoint House, it is large enough to define its own scale and character. Respondent submitted a basic site layout based on the SPD parameters to demonstrate their points.
  - Respondents considered that building heights for Site 3 in the North High Street area should be dictated by assessment of the impact on the Conservation Area, and that buildings should not exceed the tree height.

- In relation to Bromley High Street, a local group considered that heights of no more than eight storeys were suitable behind the shops along the High Street; taller blocks behind the frontage are not the norm. Guidance suggesting potential for greater heights should be removed. It was considered that development on the Churchill Quarter should not be proportionate to the Churchill Theatre.
- In relation to the Glades and Elmfield Road guidance, a number of respondents suggested that 12 storeys was not an appropriate benchmark for the Mall site – the current 12 storey building is highly intrusive.
- Commenting on the Bromley South guidance, respondents considered that there are already tall new buildings, Perigon Heights and St Mark's Place, which are detrimental to the area; there should be no more. Historic England suggested that guidance should be revised to include height parameters in order to preserve character and appearance or significance of heritage assets

6.17 Some respondents questioned whether, post-Grenfell, people would want to live in tall buildings due to fire risk. Others considered that tall buildings are not sustainable due to design, materials and costs of maintenance.

6.18 There was support for the principle of 'ensuring the form and massing of the buildings is set back from the main High Street frontage and sensitive to the ridge profile of the town centre topography'.

#### *Conservation, heritage*

6.19 Many respondents highlighted that the Conservation Area and other heritage assets are at risk from new development and should be better protected. There should be more reference to Local Plan and London Plan policies relating to conservation and heritage.

6.20 A local group suggested that the Conservation Area should have a dedicated Guidance Note referring to all relevant policies and Historic England guidance. The local group also suggested that Guidance Note 2 should also be strengthened by making reference to buildings of local heritage interest that are characteristic of the local area, together with a further description, aided by photos, of those 'heritage aspects' to which new development should refer. In addition, the group suggested that other references to the conservation area and heritage assets are added to other guidance notes, including Guidance Notes 3, 9 and 11. The group disagreed with the suggestion in the SPD that buildings harmful to the Conservation Area could be made acceptable by "set dressing" and detailing.

6.21 A local group suggested that all development proposals within or adjacent to the conservation area or affecting heritage assets should be subject to scrutiny by APCA. The group also suggested that there should be local heritage experts on the Bromley Design Review Panel.

6.22 Historic England supported the emphasis on strong architectural heritage and archaeological assets. They also suggested preparing an Archaeology SPD.

6.23 Historic England consider the first sentence of SPD2 requires some clarification. In NPPF terms, the word setting has a particular meaning (as set out in the NPPF glossary). Historic England note that, if the sentence in question is not referring directly to the setting of heritage assets, the terms townscape or character would be clearer in this instance.

6.24 One respondent considered that, overall, heritage and conservation are heavily prioritised over other goals. The respondent noted that it is important to value buildings and vistas, but the town has been transforming for a long time. We need to look to other examples, in different places and countries, where new development sits happily alongside heritage assets.

- 6.25 A local group consider that the decorative tilework on the Sainsbury's building is a valued feature of the Conservation Area, and the guidance should be revised to ensure this is retained or replaced in any development.
- 6.26 A local group noted that the description of the location of the Picturehouse in the North High Street section is not correct. The group considered that the cinema should be retained in its entirety and suggested that Martin's Hill be referenced as an important heritage asset.
- 6.27 A local group noted several buildings along Bromley High Street which are valuable Heritage Assets and which should be protected and considered for local listing. The group suggested that the High Street section should reference the Conservation Area. It was also suggested that an extension to the Conservation Area on the east side of High Street should be considered.
- 6.28 Several respondents noted that the guidance does not give enough weight to the Conservation Area and Library Gardens. Respondents also suggested that a visual and environmental assessment is needed to establish any potential impacts on the gardens, the Conservation Area and other heritage assets and their settings.

### *Transport*

- 6.29 A number of respondents commented on transport issues, including the perceived lack of reference to the concept of "Active travel" in the SPD. TfL suggest that the SPD vision should have stronger reference to sustainable transport, and there should be a stronger reference to Healthy Streets throughout. TfL also suggested that high quality cycle parking should be supported, with reference to design standards.
- 6.30 A respondent considered that the SPD should take account of evidence and higher-level guidance including "Gear Change", a walking and cycling strategy published by DfT. There was also a comment suggesting that developers should commit to S106 funding for improvements. There was a suggestion to develop a tram up the high street – hop on and off.
- 6.31 Several respondents suggested that greater consideration of the wider cycling and public transport network is needed – getting into and through the town centre. Some respondents considered that the town centre cycling infrastructure is inadequate and unsafe, and that junctions prioritise cars. The SPD should include reference to recognised standards for cycle routes. Segregated cycle lanes should be designed in.
- 6.32 A respondent expressed concern about increased cycling provision, noting that people don't shop by bicycle.
- 6.33 It was noted that green networks can enable the creation of a walking and cycling network, not just environmental benefits.
- 6.34 Car-free development was supported by several respondents but it was noted that adequate provision was needed for those not able to use public transport. There was some support for the concept of 15 minute neighbourhoods.
- 6.35 Other respondents considered that parking is important for residents coming from outer areas of the Borough and that the Council should find a way of providing free car parking. One respondent stated that it was incorrect to assume that people living in apartments in the town centre won't have cars.

- 6.36 Respondents noted the existing parking stress along Babbacombe Road and nearby, in the Bromley North Gateway sub area, and considered that this will get worse without adequate parking as part of new development.
- 6.37 TfL supported the reduction of station car parking at Site 2 but suggested that the guidance mentions the need to retain and improve bus standing.
- 6.38 TfL broadly supported guidance on a number of development opportunities in various sub-areas, particularly where it was suggested that sites could
- 6.39 be optimised through rationalisation of parking.
- 6.40 It was noted that the SPD does not allow potential for any extension of the Bakerloo Line to Bromley. The Greater London Authority noted that the Bromley Town Centre Opportunity Area is within the Bakerloo Line Extension Growth Corridor.

### *Social infrastructure*

- 6.41 A number of respondents raised the issue of social infrastructure, particularly noting concern that social infrastructure will not cope with more residential development – health education and community facilities are already under pressure. Respondents suggested that developer contributions from S106 and CIL should be put into new social infrastructure.
- 6.42 One respondent considered that health and wellbeing should be part of the vision for the town centre. Others suggested that more development will require further liaison with the NHS to ensure that the capacity of local health facilities is taken into account.
- 6.43 The NHS requested that major development proposals should be required to have a Health Impact Assessment, not just encouraged. Conversely, a developer stated that major development proposals should not be required to have a Health Impact Assessment as it is contrary to London Plan and Local Plan policy.
- 6.44 The Metropolitan Police Service raised an issue with the potential redevelopment of Waitrose at Bromley South, which could cause access problems which could severely impact the operation of the adjacent Bromley Police Station. They noted that no access agreement has yet been agreed and suggested that reference to giving pedestrians priority should be removed. The MPS considered that car free development will increase parking problems in the area which already cause risks to the emergency police response.

### *Housing*

- 6.45 There were a mix of responses relating to housing. A number of respondents suggested that there should be no more housing in the town centre, as Bromley should be considered full. Some respondents recognised the need for new housing but considered that the town centre is not the place to locate it, it should be spread out across the Borough. Other respondents supported housing in principle, including at sites identified as development opportunities in the SPD.
- 6.46 Some respondents commented on suitable types of housing, suggesting that people don't want to live in tower blocks, especially after Grenfell. Some respondents considered that housing should be low-rise and include affordable and family housing. Others suggested that more flatted development should be developed to cater for the younger demographic.
- 6.47 One respondent suggested that offices should be converted into homes.

6.48 A respondent considered that new housing should be built to the highest environmental standard.

#### *Environment and air quality*

6.49 A number of responses related to environmental issues. Several respondents noted that the green and open spaces in the town centre are highly valued and must be protected. New development could harm these spaces. Church house and library gardens were identified specifically, and considered vital to provide environmental benefits and leisure opportunities. One respondent objected to the loss or change to the wooded area in Queens Gardens that provides a buffer to Kentish Way.

6.50 Several respondents suggested adding reference in the SPD to open space designations including Urban Open Space, Local Green Space and outdoor sport and recreation policies.

6.51 Some respondents considered that the Council needs to consider air pollution, congestion and climate change; this included comments stating that it is vital that green spaces should be preserved wherever possible to encourage wildlife and biodiversity. Some respondents suggested specific interventions - tree planting on the Bromley North station forecourt should be included, and the use of green walls in the High Street area.

6.52 A respondent considered that the meaning of “wildlife features of value” is unclear, and questioned whether should this be “habitats”.

6.53 There was a suggestion to expand Guidance Note 7 to include provision for long-term maintenance of green infrastructure.

6.54 A respondent considered that development should include sustainable infrastructure including solar panels and greywater harvesting.

#### *Commercial uses (retail, leisure, office)*

6.55 Several respondents suggested that no more commercial space is needed in the town centre, as there are already many empty premises in the town centre, including at the Glades.

6.56 Several respondents including a landowner considered that the town centre retail and leisure offer should be updated – attract new-style leisure and entertainment facilities, gastropubs, remove the market, establish clear zones for different activities. It was noted that retail has been resilient but there is decline in demand from retailers and SPD should reflect the transition. Amendments were suggested to wording regarding the retail-led function of the Glades; this was considered too restrictive there should be more flexibility for other uses - residential, leisure, office, community - to reflect changing times.

6.57 A landowner noted that the Council’s retail evidence base is out of date and a new study is needed.

6.58 Several respondents noted that Bromley North is good for a concentration of restaurants.

#### *Public realm, permeability and connectivity*

6.59 There were a number of comments relating to pedestrianisation in the town centre. Some respondents supported further pedestrianisation, making the town centre 100% pedestrianised, including the area north of Market Square. However, some respondents thought that more pedestrianisation could make it worse for some and less safe at night.

- 6.60 A number of respondents supported improvements to connectivity, lighting and signage across the town centre, to improve safety and access. Connections to nearby areas, outside the town centre, should be considered. A guide to the location of toilets and step-free access should be available.
- 6.61 One respondent noted that Guidance Note 4 should account for changes in the future – it may not be necessary to preserve existing patterns of permeability if new ones are created through comprehensive redevelopment. The respondent considered that the wording in Urban Design Guide SPD was more appropriate.
- 6.62 The intention to create a way through to Martin’s Hill, as set out in the North High Street guidance, was welcomed.
- 6.63 In relation to potential new connections in the High Street area, a respondent considered that there is no benefit to north-south connections parallel to the High Street.
- 6.64 Several respondents support the retention of public access from Stockwell Close and Rafford Way to the Palace Park, should redevelopment of the Civic Centre site take place.

*General comments*

- 6.65 A number of respondents suggested additional policy references within various guidance notes.
- 6.66 Some respondents suggested that consultation on the document was very poor, as with other recent plans including Churchill Quarter and Waitrose. The Council should hold proper meetings rather than drop in chats. Comments also suggested that developers should use modern IT techniques to demonstrate in 3D what their proposals will look like. The event in Orpington by Areli was given as an example of inadequate consultation in this respect.
- 6.67 Landowners of Site 2 within the Bromley North Gateway area noted that the principle of development and the site allocation is already established in the Local Plan. Additional comments were made on certain site parameters, including a suggestion that the Network Rail car park is underused. It was considered that the viability of development must acknowledge the cost of replacing the bus stand. The respondent suggested that the guidance in the SPD is at odds with adopted policy and suggested wording was put forward to rectify the perceived issues.
- 6.68 The GLA suggested that the SPD should clarify the boundary for the Bromley Town Centre opportunity area.
- 6.69 The potential development of Sainsbury’s car park was welcomed, as was the intention to create a link between College Green and Sainsbury’s.
- 6.70 Several respondents suggested that development in Church House Gardens should be clearly ruled out.
- 6.71 A developer stated that the Churchill Quarter development will make a positive contribution to the town.
- 6.72 A landowner considered that the Glades should be identified as a development opportunity in Section 8
- 6.73 One respondent noted that the vision should prioritise making the town centre a place for children and young people.

# 7 How have the issues raised in the draft SPD consultation been addressed in the final SPD?

7.1 The Council thanks all respondents for taking the time to respond to the draft SPD. The issues raised during the draft SPD consultation have been considered in detail when preparing the final SPD. This section sets out how these responses (as set out in section 6) have been addressed in the final SPD. The comments received have informed a number of amendments, which have helped to clarify and improve the SPD guidance.

## Issues raised by consultation responses

7.2 Tables 3 to 12 below set out how the Council have addressed the consultation comments raised in section 6 (paragraphs 6.4 to 6.73) when preparing the final SPD.

7.3 There were a number of comments that concerned broad issues with the SPD format/structure, including a number of comments which suggested repeating various policies or guidance from the Local Plan, London Plan or non-statutory guidance documents. Many of the policies suggested would be relevant to development in Bromley Town Centre, but as a general rule, such policies do not need to be repeated in the SPD. The role of the SPD is to provide guidance to support the implementation of the policies in the Development Plan; the SPD needs to be read alongside the Development Plan (Bromley Local Plan and the London Plan). There are some circumstances where a reference to relevant policies may be suitable, but this does not require policies to be copied verbatim. Where appropriate, such references have been added in response to suggestions made, including additional references to relevant policy and guidance in the SPD guidance notes.

7.4 A number of respondents suggested some useful amendments to text throughout the document, to clarify or expand points. A lot of these suggestions were already covered in the SPD, or, in some cases, they were not considered appropriate; however, a number of minor amendments have been made where they were considered appropriate.

7.5 Several responses proposed the creation of new policy. While a number of these responses raised relevant issues, unfortunately an SPD can only provide guidance to help implement existing policy, and it cannot introduce new policy. Therefore, no amendments were made in relation to these comments. The Council is currently reviewing the Bromley Local Plan, and people are encouraged to respond to consultations on the emerging plan<sup>6</sup> to shape the development of new policy.

7.6 There were also a number of comments that referred to non-planning matters. While many of these comments raised legitimate points, they are outside the remit of the SPD and therefore no amendments were made in relation to these comments. However, where comments related to specific suggestions which could be relevant for other Council departments (e.g. transport), these suggestions have been forwarded to the relevant departments for information. While this does not provide any guarantee that these suggestions will be

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<sup>6</sup> The latest information on the Local Plan review process is available on the Council's website - <https://www.bromley.gov.uk/planning-policy/review-bromley-local-plan>

actioned, the relevant departments will now be aware of the comments and can consider them as part of their ongoing work (where appropriate).

**Table 3: Design, character**

Response	How has response been addressed?
Many respondents commented on the need to retain the character of Bromley Town Centre.	<p><b>Change</b> – the Council agrees with the respondents regarding the importance of protecting local character. The SPD already reflects these important points, but further policy references have been added to emphasise this further.</p> <p>Development is suitable in principle in the town centre, and the role of the SPD is to ensure that this development is optimised but taking into account key constraints.</p>
Some respondents considered that the character area maps are poor quality.	<p><b>Change</b> – all maps in the SPD have been updated.</p>
One respondent asked whether retrofit investigation should be a stronger requirement.	<p><b>Change</b> - the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p>
The SPD should include Secured by Design concepts.	<p><b>Change</b> – the Council agrees that ensuring safety through design is important. Reference to the Urban Design Guide SPD has been added. This document sets out detailed guidance on designing out crime which addresses the issues raised.</p>
A local group noted that a masterplan is needed for Site 10. This should be done by the Council, not a developer.	<p><b>Change</b> – the Council recognises concerns about 'developer-led masterplans' which may not prioritise holistic benefits for the entire Site 10, but such masterplans are not explicitly precluded by the Local Plan site allocation. A single masterplan is not considered essential so long as there is consistency across masterplans that do come forward on separate sites. The SPD provides further guidance on the masterplan requirement which will help achieve consistency, noting the need for masterplans to reflect the design principles of the SPD. Any application and accompanying masterplan that does come forward will need to provide relevant assessments in line with London Plan policy D9 and the Urban Design Guide SPD. Reference to the Urban Design Guide has been added to the SPD.</p>
Several respondents raised concern about fire safety with tall buildings.	<p><b>Change</b> – fire safety is an important issue, and the Council agrees that it is important for tall building applications to fully address this issue.</p>



Response	How has response been addressed?
	<p>Some of the issues raised by respondents are covered by other regimes, particularly Building Regulations. These regimes operate independently of planning, so it is not necessary to repeat their requirements in the SPD.</p> <p>The London Plan has a policy relating to fire safety, and the Mayor has recently consulted on a Fire Safety LPG. Reference to the policy and draft LPG has been added to the SPD.</p>
<p>Several respondents suggested that any further external development of the Glades would be inappropriate; they considered that existing development was detrimental, robbing gardens of light in winter, and the Italianate garden has been lost to the development of under-used units. Only limited architectural enhancements to the Glades should be permitted.</p>	<p><b>No change</b> – the SPD cannot limit development in principle, but it does set out guidance which would apply if development came forward at the Glades. This would ensure protection of heritage assets and amenity.</p>

**Table 4: Tall buildings**

Response	How has response been addressed?
<p>A number of respondents considered that tall buildings are not suitable for Bromley Town Centre and are particularly inappropriate near to the Conservation Area and other heritage assets. Respondents considered that tall buildings could have a negative Impact on Church House Gardens, Library Gardens and Martin’s Hill, causing over-shadowing and ruining views across the valley.</p> <p>Respondents suggesting setting limits on heights as the SPD guidance notes seem to give licence to create buildings that are too tall. Concern was raised about tall buildings creating precedent for additional tall buildings in the town centre.</p> <p>Several respondents including a local group stated that visual and heritage impact assessments should be done before any heights are established in the SPD; guidance note 11 should be amended to reflect this.</p> <p>Concern was also raised about the potential impact on local amenity.</p>	<p><b>Change</b> – we recognise that tall buildings may be more likely to cause adverse impacts (including those impacts raised by respondents). This makes the need for robust assessment of any tall building application extremely important. Further policy references have been added to the SPD to emphasise the need for detailed assessment of potential impacts. The Urban Design Guide SPD provides additional guidance on tall buildings.</p> <p>There is no in-principle restriction on tall buildings in Bromley. However, as set out in GN11, any tall building must address relevant policy requirements, which will include consideration of many of the issues raised by respondents.</p> <p>Where the SPD identifies building height, this has been informed by officer judgement taking into account the context (both in terms of the site and wider area) and consideration of relevant reference points and where taller elements can be suitably located. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed</p>

Response	How has response been addressed?
	against relevant policy (including London Plan policy D9). The SPD has been amended to clarify this.
<p>In the Bromley North Gateway sub area, several respondents considered that the heights of development on Site 2 should be determined by the impact on views and the Conservation Area, not by reference to Northpoint House which predates the designation and is detrimental. Respondents also stated that any development over 3 storeys would have negative impacts on the nearby low-rise residential area – over-shadowing, lack of privacy and security and the effect on house prices.</p>	<p><b>No change</b> – the indicative heights are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p>
<p>Conversely, developers and landowners of Site 2 noted that the principle of development and the site allocation is already established in the Local Plan. The respondents believed that the height parameters are too strict. The attempt to arbitrarily restrict heights and development capacity is contrary to D3 of the London Plan and the Local Plan site allocation, and a tall building is appropriate on this site. The respondent also considered that the site does not need to reference Northpoint House, it is large enough to define its own scale and character. Respondent submitted a basic site layout based on the SPD parameters to demonstrate their points. The respondent put forward suggested wording to rectify the perceived issues.</p> <p>Additional comments were made on certain site parameters, including a suggestion that the Network Rail car park is underused. It was considered that the viability of development must acknowledge the cost of replacing the bus stand.</p>	<p><b>Change</b> – the indicative heights are considered reasonable and appropriately justified; a minor amendment has been made to clarify that a taller element could be around 10 storeys (rather than a maximum height of 10 storeys) but this is subject to detailed design consideration. Northpoint House is still identified as the key reference point for any taller building. The SPD does not seek to preclude the delivery of appropriately designed tall buildings; important factors to be considered in relation to siting and design are highlighted in the Urban Design Guide SPD which would also apply to any development proposal.</p> <p>It is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p> <p>The SPD is not inconsistent with the Local Plan or London Plan; it does not restrict optimisation of the site to deliver a high density residential development.</p> <p>The Council notes that the Local Plan allocation capacity is indicative (not binding) and applies across the entire site. The site is now unlikely to come forward as a single site, as an application is being progressed on the Station Road car park site and other elements of the site (e.g. Northside House) are unlikely to be immediately forthcoming for inclusion in any development proposals for the remainder of the site. These are significant material changes</p>

Response	How has response been addressed?
	<p>which would undoubtedly affect site capacity, and therefore this should be taken into account when providing planning guidance for the site.</p> <p>The respondent notes that the guidance will restrict development capacity as identified in the Local Plan, but has provided no detailed evidence to support this; only vague evidence has been provided, seemingly based on limited consideration of different site layouts. None of the information submitted demonstrates that the SPD will stymie the development potential of the site in principle.</p> <p>Only vague assertions of viability issues have been put forward by the respondent. Consideration of viability could be a factor in the determination of any future planning application, where supported by detailed evidence.</p> <p>The site allocation seeks parking as part of the Site 2 redevelopment, but redevelopment of the Network Rail car park could be suitable if there is evidence that it is no longer needed for operational purposes. This would need to be justified as part of any future development proposal.</p>
<p>Respondents considered that building heights for Site 3 in the North High Street area should be dictated by assessment of the impact on the Conservation Area, and that buildings should not exceed the tree height.</p>	<p><b>No change</b> – the indicative heights are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p>
<p>In relation to Bromley High Street, a local group considered that heights of no more than eight storeys were suitable behind the shops along the High Street; taller blocks behind the frontage are not the norm. Guidance suggesting potential for greater heights should be removed. It was considered that development on the Churchill Quarter should not be proportionate to the Churchill Theatre.</p>	<p><b>No change</b> – the SPD parameters are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p>
<p>In relation to the Glades and Elmfield Road guidance, a number of respondents suggested that 12 storeys was not an appropriate benchmark for the Mall site – the current 12 storey building is highly intrusive.</p>	<p><b>No change</b> – the indicative heights are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case</p>

Response	How has response been addressed?
	by case basis, assessed against relevant policy.
<p>Commenting on the Bromley South guidance, respondents considered that there are already tall new buildings, Perigon Heights and St Mark's Place, which are detrimental to the area; there should be no more. Historic England suggested that guidance should be revised to include height parameters in order to preserve character and appearance or significance of heritage assets</p>	<p><b>No change</b> – the SPD parameters are considered reasonable and appropriately justified. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p>
<p>Some respondents questioned whether, post-Grenfell, people would want to live in tall buildings due to fire risk. Others considered that tall buildings are not sustainable due to design, materials and costs of maintenance.</p>	<p><b>Change</b> – as noted above, fire safety is recognised as an important issue and reference to additional London fire safety guidance has been added to the SPD.</p>

**Table 5: Conservation, heritage**

Response	How has response been addressed?
<p>Many respondents highlighted that the Conservation Area and other heritage assets are at risk from new development and should be better protected. There should be more reference to Local Plan and London Plan policies relating to conservation and heritage.</p> <p>A local group suggested that the Conservation Area should have a dedicated Guidance Note referring to all relevant policies and Historic England guidance. The local group also suggested that Guidance Note 2 should also be strengthened by making reference to buildings of local heritage interest that are characteristic of the local area, together with a further description, aided by photos, of those 'heritage aspects' to which new development should refer. In addition, the group suggested that other references to the conservation area and heritage assets are added to other guidance notes, including Guidance Notes 3, 9 and 11. The group disagreed with the suggestion in the SPD that buildings harmful to the Conservation Area could be made acceptable by "set dressing" and detailing.</p> <p>Conversely, one respondent considered that, overall, heritage and conservation are heavily prioritised over other goals. The respondent</p>	<p><b>Change</b> – The Council agrees with the respondents that protection of heritage assets is important. To reflect this, the SPD has a specific guidance note covering heritage and conservation (GN9) which will help to ensure that important heritage assets are fully considered as part of development proposals. It is not necessary to list all relevant heritage assets upfront in the SPD, or have a specific guidance note just for the conservation area. However, additional policy references have been added to the SPD where appropriate.</p>

Response	How has response been addressed?
<p>noted that it is important to value buildings and vistas, but the town has been transforming for a long time. We need to look to other examples, in different places and countries, where new development sits happily alongside heritage assets.</p>	
<p>A local group suggested that all development proposals within or adjacent to the conservation area or affecting heritage assets should be subject to scrutiny by APCA.</p>	<p><b>No change</b> – while APCA can provide some useful commentary on certain planning applications, it is not a formal body and does not provide expert advice; it has no agreed terms of reference or formal structure. It is not a body that is conducive to the provision of objective, expert, independent advice (in the way that the Design Review Panel is). Therefore, it is considered inappropriate to refer to them within the SPD. APCA can continue to be consulted on planning applications without reference in the SPD; even if the SPD did refer to APCA, the SPD cannot mandate consultation with APCA.</p>
<p>A local group also suggested that there should be local heritage experts on the Bromley Design Review Panel.</p>	<p><b>No change</b> - It is essential that the DRP is run as an independent, expert function, free from parochial views, in order to give appropriate design advice to inform the development of planning applications and achieve high quality design. It would not be appropriate for local groups to sit on the DRP as a matter of principle, as there would be significant concerns about their lack of impartiality, and they would not be able to provide the same calibre of expert advice. Notwithstanding this, DRP membership is determined through a rigorous selection process facilitated by the Council's DRP provider. The DRP includes experts across a number of fields including heritage.</p> <p>The Council will explore the potential for setting up a community review panel in future, which has greater potential for involving individuals and local community groups to provide feedback on applications that may be of particular significance to local communities.</p>
<p>Historic England suggest that there is potential for a separate Archaeology SPD.</p>	<p><b>Change</b> – the Council agrees with Historic England regarding the importance of archaeology. We consider that an additional SPD for archaeology is not necessary, but a reference to the Urban Design Guide SPD has been added which reinforces the importance of archaeology in Bromley. Reference to the</p>

Response	How has response been addressed?
	updated assessment of archaeological priority areas has also been added.
Historic England consider the first sentence of SPD2 requires some clarification. In NPPF terms, the word setting has a particular meaning (as set out in the NPPF glossary). Historic England note that, if the sentence in question is not referring directly to the setting of heritage assets, the terms townscape or character would be clearer in this instance.	<b>Change</b> – the SPD has been amended to reflect suggested terminology.
A local group consider that the decorative tilework on the Sainsbury’s building is a valued feature of the Conservation Area, and the guidance should be revised to ensure this is retained or replaced in any development.	<b>No change</b> - the Conservation Area SPG (cited in the SPD) refers to the decorative panels but does not set out whether they make a contribution to the CA. Activation of the frontage is considered to be a stronger priority, but activation could include elements that add visual interest to a building façade.
A local group noted that the description of the location of the Picturehouse in the North High Street section is not correct. The group considered that the cinema should be retained in its entirety and suggested that Martin’s Hill be referenced as an important heritage asset	<b>Change</b> – the SPD has been amended to clarify the erroneous description and to recognise that there may be additional heritage assets that might be relevant to consideration of proposals for Site 3.
A local group noted several buildings along Bromley High Street which are valuable Heritage Assets and which should be protected and considered for local listing. The group suggested that the High Street section should reference the Conservation Area. It was also suggested that an extension to the Conservation Area on the east side of High Street should be considered.	<b>No change</b> – conservation areas and local listing cannot be identified through an SPD. The suggestions will be noted and may be considered in future when considering potential new conservation areas or additions to the local list.
Several respondents noted that the guidance does not give enough weight to the Conservation Area and Library Gardens. Respondents also suggested that a visual and environmental assessment is needed to establish any potential impacts on the gardens, the Conservation Area and other heritage assets and their settings.	<b>No change</b> – the Council agrees that these assets are important considerations. The SPD already provides sufficient guidance to ensure that these assets will continue to be protected. Potential impacts on any assets would be assessed based on a submitted development proposal.

**Table 6: Transport**

Response	How has response been addressed?
<p>A number of respondents commented on transport issues, including the perceived lack of reference to the concept of “Active travel” in the SPD. TfL suggest that the SPD vision should have stronger reference to sustainable transport, and there should be a stronger reference to Healthy Streets throughout. TfL also suggested that high quality cycle parking should be supported, with reference to design standards.</p> <p>A respondent considered that the SPD should take account of evidence and higher-level guidance including “Gear Change”, a walking and cycling strategy published by DfT. There was also a comment suggesting that developers should commit to S106 funding for improvements. There was a suggestion to develop a tram up the high street – hop on and off.</p> <p>Several respondents suggested that greater consideration of the wider cycling and public transport network is needed – getting into and through the town centre. Some respondents considered that the town centre cycling infrastructure is inadequate and unsafe, and that junctions prioritise cars. The SPD should include reference to recognised standards for cycle routes. Segregated cycle lanes should be designed in.</p>	<p><b>Change</b> – The SPD does highlight the importance of walking, cycling and public transport, and supports further opportunities for active travel as part of the ‘connected’ design principle. The SPD vision has been amended to reflect comments from TfL (using the term minimised not mitigated).</p> <p>The SPD references the updated Planning Obligations SPD which sets out requirements for obligations to secure transport network improvements and improved sustainable transport measures. Specific reference to transport planning obligations has been added to highlight the importance of these measures.</p>
<p>Other respondents considered that parking is important for residents coming from outer areas of the Borough and that the Council should find a way of providing free car parking. One respondent stated that it was incorrect to assume that people living in apartments in the town centre won’t have cars.</p> <p>Respondents noted the existing parking stress along Babbacombe Road and nearby, in the Bromley North Gateway sub area, and considered that this will get worse without adequate parking as part of new development.</p>	<p><b>No change</b> – the SPD reflects parking policy set out in the London Plan; it cannot introduce new policy.</p> <p>The London Plan parking standard for Metropolitan Town Centres would be the relevant parking standard for Bromley Town Centre; this sets out a requirement for car-free development.</p>
<p>TfL supported the reduction of station car parking at Site 2 but suggested that the guidance mentions the need to retain and improve bus standing.</p>	<p><b>No change</b> – the allocation and SPD already refer to the provision of a transport interchange, which is considered sufficient.</p>

Response	How has response been addressed?
<p>It was noted that the SPD does not allow potential for any extension of the Bakerloo Line to Bromley. The Greater London Authority noted that the Bromley Town Centre Opportunity Area is within the Bakerloo Line Extension Growth Corridor.</p>	<p><b>No change</b> – the SPD is not relevant to the Bakerloo extension, notwithstanding the fact that the proposed scheme does not have an agreed business case or funding.</p>

**Table 7: Social infrastructure**

Response	How has response been addressed?
<p>A number of respondents raised the issue of social infrastructure, particularly noting concern that social infrastructure will not cope with more residential development – health education and community facilities are already under pressure. Respondents suggested that developer contributions from S106 and CIL should be put into new social infrastructure.</p>	<p><b>No change</b> – a number of valid concerns have been raised in terms of infrastructure provision and the need for new development to ensure that the capacity of local infrastructure is sufficient to support existing communities and new development.</p> <p>Bromley CIL has been adopted which is intended to cover general infrastructure requirements, securing contributions from individual schemes which can be used to fund new/improved infrastructure (as determined by the Council). If a proposal will cause site-specific impacts/pressures on infrastructure, there is potential to secure specific infrastructure or contributions toward new infrastructure.</p> <p>The updated Planning Obligations SPD sets out a range of requirements relating to infrastructure, and is referenced in section 2.</p>
<p>The NHS requested that major development proposals should be required to have a Health Impact Assessment, not just encouraged. Conversely, a developer stated that major development proposals should not be required to have a Health Impact Assessment as it is contrary to London Plan and Local Plan policy.</p>	<p><b>No change</b> – the Council recognises that HIAs can be beneficial in terms of identifying and addressing health impacts of development. However, there is no Local Plan policy for HIAs, only the reference in Objective GG3 of the London Plan. Therefore, it is not possible to introduce a stronger requirement as this would be creating new policy.</p>
<p>The Metropolitan Police Service raised an issue with the potential redevelopment of Waitrose at Bromley South, which could cause access problems which could severely impact the operation of the adjacent Bromley Police Station.</p>	<p><b>Change</b> – the Bromley South section has been amended to add specific reference to this issue, namely the need for any development proposals to ensure there are no adverse impacts on the function of Bromley Police Station.</p>



**Table 8: Housing inc. Affordable Housing**

Response	How has response been addressed?
<p>A number of respondents suggested that there should be no more housing in the town centre, as Bromley should be considered full. Some respondents recognised the need for new housing but considered that the town centre is not the place to locate it, it should be spread out across the Borough. Other respondents supported housing in principle, including at sites identified as development opportunities in the SPD.</p>	<p><b>No change</b> – the Council recognises the issues raised with regard to housing in town centres, and understands the concerns raised about the scale of housing development and the potential impacts this may have; with regard to additional infrastructure pressures, the responses in table 9 set out what the SPD and other documents can do to ensure sufficient infrastructure is in place.</p> <p>However, the town centre is a suitable location for housing in principle. The London Plan identifies Bromley town centre as an opportunity area and as having ‘high’ residential growth potential. This is adopted Development Plan policy prepared by the Mayor of London and the SPD cannot change this. It is noted that the Bromley Local Plan also supports residential development in town centres.</p>
<p>Some respondents commented on suitable types of housing, suggesting that people don’t want to live in tower blocks, especially after Grenfell. Some respondents considered that housing should be low-rise and include affordable and family housing. Others suggested that more flatted development should be developed to cater for the younger demographic.</p>	<p><b>No change</b> – there are a number of potentially suitable types of housing that could be appropriate in the town centre, including tall buildings. Actual suitability would depend on the circumstances of individual sites. The Local Plan and London Plan includes policies relating to affordable housing; these policies do not need to be repeated in the SPD.</p>
<p>One respondent suggested that offices should be converted into homes.</p>	<p><b>No change</b> – such conversions may be appropriate, but this would be established on a case by case basis; it would not be appropriate in all locations or on all sites.</p>
<p>A respondent considered that new housing should be built to the highest environmental standard.</p>	<p><b>No change</b> - ensuring a high standard of quality for new homes is important. Policies set out in the NPPF, the London Plan and the Local Plan are effective at ensuring higher environmental standards than set out in the Building Regulations.</p>

**Table 9: Environment and air quality**

Response	How has response been addressed?
<p>A number of responses related to environmental issues. Several respondents noted that the green and open spaces in the town centre are highly valued and must be</p>	<p><b>No change</b> – the Council agrees that these spaces are important, which is why the SPD has guidance to ensure their continued protection. Development in proximity to these spaces is not</p>

Response	How has response been addressed?
protected. New development could harm these spaces. Church house and library gardens were identified specifically, and considered vital to provide environmental benefits and leisure opportunities. One respondent objected to the loss or change to the wooded area in Queens Gardens that provides a buffer to Kentish Way.	unsuitable in principle, but such development would need to be designed appropriately.
Some respondents considered that the Council needs to consider air pollution, congestion and climate change; this included comments stating that it is vital that green spaces should be preserved wherever possible to encourage wildlife and biodiversity. Some respondents suggested specific interventions - tree planting on the Bromley North station forecourt should be included, and the use of green walls in the High Street area.	<b>No change</b> – the Council agrees that green spaces should be preserved and opportunities for new green infrastructure should be explored. The SPD includes guidance to ensure this.
A respondent considered that the meaning of “wildlife features of value” is unclear, and questioned whether should this be “habitats”.	<b>No change</b> – the term is considered sufficiently clear and covers a range of potential features which promote and protect habitats.
There was a suggestion to expand Guidance Note 7 to include provision for long-term maintenance of green infrastructure.	<b>No change</b> – Guidance Note 7 sets out guidance relating to securing new or enhanced green infrastructure. Details of how this would be secured and maintained are set out in the Planning Obligations SPD (which is referred to in section 2 of the SPD).
A respondent considered that development should include sustainable infrastructure including solar panels and greywater harvesting.	<b>No change</b> – new sustainable infrastructure is an important requirement. The SPD already refers to this in Guidance Note 14, reflecting policies in the London Plan in particular, which require all new development to include renewable energy generation, wherever possible, and other sustainable infrastructure.

**Table 10: Commercial uses (retail, leisure, office)**

Response	How has response been addressed?
Several respondents suggested that no more commercial space is needed in the town centre, as there are already many empty premises in the town centre, including at the Glades.	<b>No change</b> – there is no reliable evidence of high vacancy rates in the town centre. New commercial space is supported in principle although the type and scale of space provided could vary depending on specific development proposals. Notwithstanding this, Local Plan Policy 92 does allow loss of space where

Response	How has response been addressed?
	justified; it is not necessary to repeat this in the SPD.
<p>Several respondents including a landowner considered that the town centre retail and leisure offer should be updated – attract new-style leisure and entertainment facilities, gastropubs, remove the market, establish clear zones for different activities. It was noted that retail has been resilient but there is decline in demand from retailers and SPD should reflect the transition. Amendments were suggested to wording regarding the retail-led function of the Glades; this was considered too restrictive there should be more flexibility for other uses - residential, leisure, office, community - to reflect changing times.</p> <p>One respondent noted that the vision of the SPD assumes sustained demand for commercial floorspace which is over optimistic. The high street needs to find a new purpose, with more restaurants and bars.</p>	<p><b>Change</b> - diversification of commercial uses, e.g. to include more leisure uses, is supported by the SPD. A minor change has been made to paragraph 8.7 to refer to 'commercial' function rather than 'retail' function, which reflects the potential for commercial diversification.</p>
<p>A landowner noted that the Council's retail evidence base is out of date and a new study is needed.</p>	<p><b>No change</b> – the Council's retail evidence base will be updated as part of the Local Plan review.</p>

**Table 11: Public realm, permeability and connectivity**

Response	How has response been addressed?
<p>There were a number of comments relating to pedestrianisation in the town centre. Some respondents supported further pedestrianisation, making the town centre 100% pedestrianised, including the area north of Market Square. However, some respondents thought that more pedestrianisation could make it worse for some and less safe at night.</p>	<p><b>No change</b> – the Council notes the comments relating to pedestrianisation, and that there is no consensus for or against such schemes. The SPD supports improvements to sustainable transport but cannot mandate pedestrianisation even if this was considered appropriate. The suggestions have been passed to the relevant Council department for information.</p>
<p>A number of respondents supported improvements to connectivity, lighting and signage across the town centre, to improve safety and access. Connections to nearby areas, outside the town centre, should be considered.</p>	<p><b>No change</b> – the SPD highlights the importance of connectivity, which includes connections to the wider area (as set in Guidance Note 4 and its accompanying text).</p>
<p>One respondent noted that Guidance Note 4 should account for changes in the future – it may not be necessary to preserve existing</p>	<p><b>Change</b> – Guidance Note 4 seeks connection with existing routes but the guidance would allow for flexibility in the case of</p>

Response	How has response been addressed?
patterns of permeability if new ones are created through comprehensive redevelopment. The respondent considered that the wording in Urban Design Guide SPD was more appropriate.	comprehensive redevelopment which removes existing routes entirely. The Urban Design Guide SPD would also apply to any development proposals; reference to the Urban Design Guide has been added to the SPD.
In relation to potential new connections in the High Street area, a respondent considered that there is no benefit to north-south connections parallel to the High Street.	<b>No change</b> – the Council disagrees with this view. Increased permeability and high standards of accessibility and inclusive design would be a significant benefit, especially in terms of Site 10 delivery, as it would help to stitch the individual sites together.

**Table 12: General comments**

Response	How has response been addressed?
Some respondents suggested that consultation on the document was very poor, as with other recent plans including Churchill Quarter and Waitrose. The Council should hold proper meetings rather than drop in chats. Comments also suggested that developers should use modern IT techniques to demonstrate in 3D what their proposals will look like.	<b>No change</b> - the Council considers that the SPD consultation was extensive and satisfied all statutory requirements. It was also consistent with the Council's adopted Statement of Community Involvement (SCI).  The SPD encourages development proposals to use 3D modelling.
The GLA suggested that the SPD should clarify the boundary for the Bromley Town Centre opportunity area.	<b>No change</b> – it is not necessary to provide further clarity relating to the OA boundary, as Policy 90 of the Local Plan clearly sets out the OA boundary equates to the town centre boundary.
Several respondents suggested that development in Church House Gardens should be clearly ruled out.	<b>No change</b> – the SPD is clear that Church House Gardens is unlikely to see much, if any, development, but it cannot rule out development completely. The area is designated as Urban Open Space and a Local Green Space in the Local Plan, which would be relevant to any development proposals that did come forward.
A landowner considered that the Glades should be identified as a development opportunity in Section 8	<b>No change</b> – the SPD sets out some broad guidance for larger-scale development of the Glades in paragraph 8.9; this is considered sufficient detail for the SPD. Any plans for development at the Glades would be more suitable taken forward as part of the Local Plan review.
One respondent noted that the vision should prioritise making the town centre a place for children and young people.	<b>No change</b> – the vision applies across age ranges. The Local Plan and London Plan have policies concerning playspace and playable environments that would apply to development in the town centre;

<b>Response</b>	<b>How has response been addressed?</b>
	the SPD has reference to these policies in sections 7 and 8.

# Appendices

## Appendix 1: summary of preliminary consultation responses, by theme

### Themes<sup>7</sup>

1. The future of Bromley Town Centre
2. Housing
3. Transport and infrastructure
4. Offices
5. Retail, culture and leisure
6. Public realm, permeability, and connectivity
7. Historic environment
8. Green infrastructure
9. Environment and air pollution
10. Development opportunities

### **1 The Future of Bromley (post covid)**

84 responses received

#### ***What do you think makes a good Town Centre?***

#### ***A good town centre has...***

- Pedestrianised areas with shops and independent cafes and restaurants
- Unique styles to highlight different parts of the town centre
- Community policing
- Good transport infrastructure and minimal traffic
- A broad mix of uses and functions with connected accessible public realm and green space
- A café culture with outside space
- A wide variety of uses (not just shops)
- Safe cycle links to limit pollution
- Make Bromley a 'little London'
- Great retail options and a night time economy
- Bromley needs a modern landmark
- Good community engagement
- A visible and distinctive heritage and culture
- Regular and varied civic representation/information
- A library of things
- Facilities to allow people to recycle
- More activities/opportunities to draw people in, including volunteering

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<sup>7</sup> General comments received have been grouped into relevant themes for the purposes of this summary.

### ***A good town centre is...***

- Clean with no closed shops
- A place that allows businesses to thrive by creating a safe, accessible place to live and visit
- Accessible by walking, cycling and public transport
- A good mixture of recreation and retail space
- Mostly pedestrianised, encouraging cultural activities
- Safe and accessible by all transport modes
- A place that has good internet and wifi available to all space users
- Clean, safe, and inclusive
- Easily accessible

### ***A good town centre should...***

- Encourage active travel
- Make the most of individuality of the town rather than creating generic spaces
- Retain the theatre and entertainment facilities
- Encourage shopkeepers to take pride in the pavement space outside their shop
- Provide flexible and casual 'home office' spaces now that so many people working from home
- Provide play areas for children away from main roads
- Ban bonfires

### ***What would you like your area to look like in the future?***

#### *Housing Development*

- More mixed-use developments
- Keep new development low density
- Provide high quality accommodation
- Property should be local resident or council owned

#### *Sustainability/Environment*

- Reduce carbon dioxide emissions by encouraging sustainable travel
- Make Bromley Town Centre cleaner and more sustainable
- Promote and implement the Green New Deal
- Make Bromley Town Centre environmentally focused
- Ensure the parks are not strewn with litter
- Bromley Town Centre should focus on wellbeing

#### *Heritage*

- Preserve existing historical buildings
- Prominence should be given to the town centre's heritage
- There should be a greater emphasis on heritage
- The town centre should be respectful to existing heritage assets
- Make Bromley Town Centre cleaner and more sustainable

### Transport

- Greener and more accessible active travel
- Better transport links
- Prioritise pedestrians and cyclists
- Area should focus on pedestrian and cycle experience
- Lower traffic and wider pedestrian access

### Public Realm

- Increase the available landscaping to make the town greener
- Improve the public realm
- More water fountains
- Plant more trees and maintain existing trees (cutting back, cleaning up leaves etc)
- Clearly signpost the parks from the High Street and the Glades
- Increase planting through Bromley North

### Open Space

- More outdoor spaces
- Preservation of the green environment
- Introduce some sheltered outdoor spaces
- More spacious areas

### Retail/Commercial

- More outside seating (with heaters for winter)
- More independent retail, and more support for local businesses
- Encourage emerging businesses
- Environmentally friendly refill shops

### Community Facilities

- Promote safer areas
- More community togetherness
- Make the most of existing assets such as Churchill Theatre and Queens Gardens
- More community activities
- Retain leisure and library facilities at affordable prices
- Increase small outdoor events
- Empty retail units being brought into use for community facilities such as pop-up shops and cafes, training opportunities for students or apprentices

### **What could the town centre offer that it does not already?**

#### Transport

- Segregated cycle lanes
- A better system for walking
- More than one quick transport link
- Improved accessibility for elderly and disabled access to buildings, parks, pavements and crossings



- More car free areas and designated cycle routes
- Bakerloo Line Extension to Bromley
- A pedestrianised high street
- No more parking on East Street – give these spaces to shops and cafes to use as outdoor space
- Commitments to the concept of 20-minute neighbourhoods
- Increased parking costs to dis-incentivise driving into the centre

### Sustainability/Environment

- More recycling and refuse facilities
- Solar panels on buildings
- Zero waste shopping
- An energy strategy to ensure that store lights are switched off over night
- Watering systems installed to protect existing planting
- Living walls to increase vegetation
- Plenty of water fountains to encourage people to fill their bottles and not purchase single use plastic bottles

### Retail/Commercial

- Themed business days (once a month, stay open until 11pm)
- More upmarket shops
- Localised food market that only allows Kent produced products
- More free meeting places for local charities
- A roof top bar
- Improvements to the high street
- Provide opportunities for start-ups and creative retailers
- Provide more outdoor dining space
- More open-air cafes and outdoor entertainment
- Improved night-time market and animate the central area
- Solar panels on buildings

### Community Facilities

- A community fridge
- A youth centre
- Permanent town centre police
- An auction house
- Community gardening and food growing project
- A mural on the side of Churchill Theatre
- More child play areas
- Christmas light trail in Palace Park; the nicer trees could have lights on their trunks and a lit-up float on the lake
- Work with Churchill Theatre to bring in more interesting productions
- Somewhere to work 'from home' away from home
- Utilise the open performance area in Church House Gardens for local musicians and theatre in the summer
- More interactive activities such as climbing walls, skating discos, laser shooting etc
- More indoor spaces for community and cultural activities

- Better interpretation and understanding of the town centre heritage
- Wi-fi service for those pedestrian areas not already served by the Glades
- New public toilets easily accessible from/in Church House Gardens

#### General Comments

- Better use of outside space
- Integrate nearby parks better with the central retail area
- No more high-rise blocks which invade privacy and are a blot on the landscape
- Improvements to Churchill Gardens to make it a cleaner, safer space

#### ***Do you have any other comments in relation to planning for recovery post-COVID 19 and adapting to changes to the role of town centres?***

#### General Comments

- Move forward with the Churchill Way applications
- Flexible re-purposing of planning uses
- There needs to be an enhanced communication system from LBB to community organisations
- Stop wasting money replacing herringbone brick with ugly white tiles
- Create a village feel with classy lighting rather than the current soulless ugly streetlights
- Employ planners to identify and consult on areas of the borough that would welcome development

#### Public Realm

- Provide drinking fountains
- Monitor levels of air pollution in the town centre
- Reinstate public-accessible toilets
- There needs to be more seating on the high street, especially sheltered seating
- Remove push-button walk signals and replace with zebra crossings
- Dead trees in boxes do not improve the street look. Replace them and pay for the upkeep
- Improve the public realm and make streets safer to walk and cycle

#### Community Facilities

- Bromley needs to become more community focussed
- Planning for recovery should encourage and enable community and cultural enterprises to take up empty retail properties
- Bromley Town Centre should offer something for local people working from home
- Promote cultural destinations
- Employ more police to ensure the town is safe
- There should be a community supported space for mums with pushchairs to socialise

#### Housing Development

- Less office space and more enjoyable living space. Convert unused office and retail units into new homes
- No more high-rise development

- Provide more housing
- If residents are threatened with compulsory purchase, then no new buyers are going to buy residential properties in the town centre

### Open Spaces

- Improve the parks
- Consider small-enclosed garden areas that provide plenty of wildlife friendly planting
- Look for funding and plan to restore Queens Gardens, the Palace Park and Church House Gardens
- There should be clear and inviting routes into Queens Gardens and Churchill Gardens

### Transport

- Encourage responsible cycling and cycle friendly schemes
- More should be done to encourage walking with more responsive pedestrian crossings
- Increase pedestrianisation to include East Street and the top of the high street beyond Primark
- Invest in active travel
- Pedestrian paths should be widened
- Relief roads are being used as racing tracks and is extremely dangerous
- There should be more speed restrictions and traffic cameras

### Retail/Commercial

- Support local businesses
- Invest in office space for home workers
- Bigger store names are needed in Bromley
- Make it more affordable for businesses to flourish
- Give small retailers somewhere to send their product
- Take advantage of empty retail units to change the tone of the town centre
- Redevelop The Mall
- Shops should provide better disabled access
- More independent retail units
- Planning for recovery should encourage and enable community and cultural enterprises to take up empty retail properties
- The drive in the 2010 Area Action Plan is now part of the Local Plan calls for retail expansion at all costs and is now pointlessly destructive

## **2 Housing**

58 responses received

### ***How can we best accommodate residential development within the town centre to complement the commercial role of the centre?***

- New developments should be sympathetic to the local area
- Good quality accommodation should exceed minimum space standards
- Existing and future retail businesses and charities need assistance and encouragement
- Discourage buy to let

- Be bold with the architecture
- Do not build any more high rise
- It would be good to identify an area for independent business space which is affordable
- Communal spaces should be as generously provided as possible
- More guidance on 'opportunity sites'
- Gentle densification of the satellite areas
- It is better to build upwards than build out and encroach the Green Belt
- Redevelop South of the high street as high-density town centre residential
- Identify massing opportunities and suitable building heights
- Support the creation of residential floorspace
- There needs to be better access to green and open spaces
- Ensure there is the necessary infrastructure in place to support new housing and facilities
- Limit car parking opportunities

***What type of housing should be the priority?***

- Affordable home to rent – 32 responses
- Affordable home to buy – 36 responses
- General market home to rent – 12 responses
- General market home to buy – 13 responses
- Homes of multiple occupation (HMO) – 2 responses
- Student accommodation – 6 responses
- Supported housing for vulnerable people – 15 responses

***Is there a particular housing size that should be prioritised?***

- One bed home – 25 responses
- Two bed home – 36 responses
- Three bed home – 19 responses
- Four+ bed home – 2 responses

***Do you have any other comments in relation to housing in Bromley Town Centre?***

*Affordable Housing*

- Can any of the long-term empty office spaces be converted into affordable housing?
- There is not enough new social housing

*Housing Development*

- Convert some of the empty office blocks into accommodation for the homeless
- Bromley Town Centre is the perfect spot for housing
- High density flatted development is considered the most suitable type of housing for this location
- Lower density development would not fully optimise previously developed brownfield land with excellent transport connections
- Heights of blocks should be limited
- All new builds need to have a balcony
- Do not remove existing housing stock

- Do not overdevelop what was once a lovely suburban town
- There should be a mix of housing types to encourage communities

### Sustainability

- Convert some of the empty office blocks into accommodation for the homeless
- Bromley Town Centre is the perfect spot for housing
- There should be more provision for green spaces
- Surrounding parks should be revamped and cleaned properly
- Wildlife projects could encourage animals back to the area
- Solar panels should be added to new development
- All new developments should have rainwater tanks built in

## **3 Transport and Infrastructure**

98 responses received

***How important is walking, cycling, and public transport for the success of town centres?***

### Public Transport...

- Is vital as nobody wants to use a traffic choked Bromley Town Centre
- Will allow the town centre to attract visitors
- Is essential for health and air quality
- Is no more important than other transport modes
- Will make the roads safer and the street scene more pleasant
- Is important but people should not be forced to use bicycles
- Important to have cleaner air and reduce carbon footprint
- Should be an essential consideration in the town centres future

### Bromley...

- Is vital as nobody wants to use a traffic choked Bromley Town Centre
- Will allow the town centre to attract visitors
- Has become too car reliant leading to traffic levels which discourage public transport
- Should focus their efforts on active travel as the dominant mode of transport
- Should supply more cycling safe stores around the town centre
- Should ensure there is sufficient infrastructure to encourage safe active travel
- Will be more attractive if it is car free
- Is unpleasant to drive around
- Has poor cycling infrastructure and needs segregated cycle lanes
- Needs to avoid a car-led covid recovery
- Is dangerous as cyclists try to travel through crowds of people

### Sustainable...

- Methods of transport are needed to save the planet
- Modes should be encouraged but adequate car parking is needed to meet the need and support the function of the town centre
- Transport benefits local businesses

### Other Comments

- Car parks take up too much space
- Improved access to the town centre will encourage increased use of existing facilities
- Active travel users spend 40% more time in local shops than motorists
- Active travel users are key to the prosperity of the town centre
- It is important that buses are more frequent to enable access for disabled people
- There should be more buses in circulation at peak times as it is too busy
- The decline in Bromley Town Centre is due to the rise in online shopping

### **What opportunities are there for new or enhanced walking and cycling routes in the Town Centre?**

#### Walking

- Plan better walking routes to the town centre
- Increase pedestrian crossings by Shortlands Station
- More of the high street can be pedestrianised
- The A21 is really unpleasant to walk along
- Improve pavements around Ethelbert/Ringers/Ravensbourne Road for those walking into Bromley
- The walking potential between Shortlands and Bromley needs to be improved
- A signalled crossing at Westmoreland Road/Hayes Lane will make walking more accessible
- Dedicated walking routes should be established
- A detailed review of all access routes to the main high street needs to be done
- Pedestrianise the area from Bromley South all the way to the Picture House Cinema and restrict cars 100% during day hours

#### Cycling

- No more needs to be done, cyclists already have lots of space
- Cycling provision is currently disjointed and needs to be continuous
- Bromley is not cyclist friendly
- There needs to be a clear cycling route from Beckenham to Bromley
- Work with TfL to deliver more cycle routes along A21
- North/South cycle route on Kentish Way is poor
- Cycle lanes are confusing, intermittent and dangerous
- Better links to Waterlink Way
- Inadequate and poorly designed cycle routes
- Better cycling provision is needed on Westmoreland Road and Hayes Lane
- Cycle path along Kentish Way is unpleasant to use
- More bus lanes that cyclists can use
- Provide a route from Borough border along Burnt Ash Lane via Plaistow roundabout and Bromley North
- Junction at Masons Hill is dangerous for cyclists and needs to be redesigned

### Other Comments

- Make roads safer
- More EV charging points
- Radical changes are needed to transport in Bromley

- Restrict visiting vehicles to the multi-storey car parks
- Create a more pleasant town centre that focuses on green spaces and sustainable transport
- Current transport provision is biased towards drivers
- More cycle spaces outside Bromley South
- Block off all known traffic rat runs in suburban roads to ensure car drivers only use main roads and not residential streets - let's making our streets community places again and not traffic jam nightmares

***Does car parking have a role in future? Should development in Bromley Town Centre be car-free?***

*Car-Free*

- All new development must be car free
- There is no need for more parking in Bromley
- Remove existing parking spaces to discourage parking
- Town centre residential development should not require parking
- On street parking should be re-purposed for outdoor seating and additional walking space
- More residential accommodation taking advantage of the public transport links
- Other modes, especially greener modes, should be given more inclusion future planning
- The town centre should be car free and there should be no more on-street parking
- There is a need for more taxi parking
- Existing public transport system is excellent and car clubs are becoming increasingly popular
- Car parking in the town centre should be repurposed and reimagined to provide space for car clubs, secure cycle parking, delivery hubs for cargo bikes and cycles

*Pro-Car*

- Not car free
- Many people rely on being able to park to access facilities
- Off-street parking for retail remains important
- Many people rely on their car for work so car parking is necessary
- Cars are still required in the town centre
- Car use is still important for disabled users
- Underground parking should be explored as an option to save on space
- Car parking must prioritise non fossil fuel vehicles
- Any new car parks should have plenty of EV charging points
- Public transport is not viable for many people
- Remove cars, remove business
- Bromley Town Centre will not attract a sufficient amount of users to sustain businesses without the provision of sufficient parking and infrastructure
- Electric vehicles should be encouraged

*Mixed*

- Car parking should be discouraged but still remain available
- There needs to be a better balance of provisions for all transport modes
- Parking should only be available for disabled drivers and families with young children
- EV charging points should not take up pavement space
- The two main supermarkets in Bromley should be able to retain car park spaces

## ***Are there any improvements to public transport that you would like to see?***

### General

- Not car free
- I am very happy with Bromley's public transport infrastructure
- Transport is largely adequate
- Greener fuels
- Public transport is currently very good
- The centre should be majority public transport
- More EV charging points should be provided
- Hail and ride should be encouraged where it is safe
- More crossings and pathways with public spaces for relaxing with small architecture
- Re-open Palace View Road for taxi use and allow cars to use the link between Elmfield Road and Kentish Way
- There is scope for better links to some areas to draw in trade – e.g. parts of Sydenham, Forest Hill etc.

### Bromley South Station

- Bromley South needs to be better
- Bromley South Station needs to be modernised
- 24/7 trains should run from Bromley South to London Victoria
- Bromley South Station is not a great gateway to the town centre
- There needs to be better access to Bromley South platforms
- It needs to be redeveloped so it is fit for purpose
- Improved access is needed in and out of the station – additional exits
- Better transport interchange at Bromley South for all modes
- Bromley South is very popular but overcrowded
- Bromley South station needs to be re-expanded onto Waitrose car park as, pre-covid, it was very overcrowded and dangerous at peak times

### Bromley North Station

- Buses and trains through Bromley North could be improved
- Direct trains to Central London from Bromley North will reduce capacity at Bromley South and benefit surrounding shops
- Bromley North is grossly underserved and should have a direct service to Central London
- Bromley North Station should operate fully at the weekends
- Improve capacity on shuttle train to Grove Park
- Trains are often delayed in and out of Bromley which is never good
- Investment is needed to handle growth in rail travel

### Bakerloo Line/Tramlink/Dockland Light Railway

- Extend the Bakerloo Line from Lewisham to Bromley via Beckenham and Shortlands
- The Council should agree to the Bakerloo Line Extension
- Extend Tramlink into Bromley
- Tram should be extended from Elmers End into Bromley



- Extend the Underground into Bromley Town Centre
- The DLR should come into the Borough

### Cycling

- Allows bicycles on trains
- There needs to be more segregated cycle paths
- Invest in cycle routes
- More cycle parking/lock up points at train stations
- Facilitate cycling and make it more pleasant
- Car and cycle paths need to be kept separate
- There needs to be a new bicycle trail that is better regulated

### Buses

- More bus lanes are needed along A21
- Lack of fast connections to Lewisham and Southwark - faster bus routes beneficial (less stops)
- Buses need to be more frequent
- Bring back cash payments on buses
- More bus shelters should be built
- Bus services should not be allowed to decline
- More buses should be running
- Electric buses and more direct routes to schools
- Buses struggle to get through to the High Street on north side due to cars parked along the road
- More buses are needed on many routes, especially school routes
- Increase buses at peak time
- TfL countdowns should be provided at all busy bus stops in the Borough
- There needs to be more continuous routes around the Borough without having to change
- Electric buses would help reduce air pollution
- All buses should be electric within 2 years
- Connections with Biggin Hill and rural Bromley must be improved

### ***What do you think are the priority infrastructure requirements for Bromley Town Centre?***

#### Cycling

- Safe cycling and pedestrian access to Bromley Town Centre
- Ensure cyclists are kept safe and visible on the roads
- More cycle lanes, better pavements and more areas to crossroads safely
- Investment in safe cycling infrastructure
- Ensure there is a cycle route from Market Square to Bromley South
- Remodelling of the road for proper cycle routes
- Improve road safety and cycle connections
- Introduce new green spaces and cycling infrastructure

#### Public Transport

- Relieve pressure on public transport
- Extend the Bakerloo Line to Bromley Town Centre

- Less encouragement to use cars
- Improvements need to be made to Bromley South

### Walking/Pedestrians

- More public spaces to congregate, walk and browse
- Improve and widen pedestrian areas from Bromley High Street to Bromley South
- Living streets favouring pedestrians
- Make it easier to cross the A21
- More outdoor spaces for people
- Pedestrianising the town centre
- Access which prioritises active travellers
- The streets should be fully opened to people and the local businesses to provide more outside dining options

### General Comments

- Create more LTNs
- Deliveries only at night
- Resolve congestion and waiting time at traffic light junctions
- The entire town centre should be car free
- Provide drop off/pick up areas for the Glades
- More EV charging points should be provided
- Reduce traffic down Queensmead Road by stopping it being a rat run from Bromley High Street
- The recent improvements to the public realm there have very much improved the look of the area however traffic volumes and behaviour are still a concern
- The re-development and expansion of Bromley Station is a priority (if commuting is re-established)
- The traffic impacts of the town centre need to be addressed

## **4 Offices**

31 responses received

### ***How can the employment role of the town centre be maintained and improved?***

- Stop converting offices into flats and then building more offices
- There is little current need for office space in Bromley
- There is a massive opportunity to create more shared working spaces
- Help attract start-up businesses
- Redevelop current old office spaces into taller, modern spaces that will attract new businesses
- Promote and support new businesses
- Reduce business rates
- Promote flexible/short-term use of office space in empty properties
- Create spaces that can be used as hubs for their employees

***What type of office space do you think will be necessary to ensure that the Town Centre can adapt to changes in the way people work?***

- Co-working
- Shared and flexible working spaces
- Low density offices
- Environmentally friendly workspaces
- New offices need to be modern to support the technological infrastructure required
- Short-term lets
- Flexible renting/leasing terms that will attract a wide range of businesses
- There are already vacant offices in Bromley
- Existing ad hoc spaces are already unaffordable
- The Town Centre should adapt by preparing to lose the businesses most supported by the office workers who have left or are leaving
- Include varied community working spaces across all sorts of industries not just traditional office work

## 5 Retail, Culture and Leisure

55 responses received

***Does Bromley Town Centre's retail offer need to change to adapt to changing circumstances? If so, what changes do you think could be put in place to facilitate this?***

- Change policies to promote redevelopment of poor quality and redundant retail into residential
- There could be more done to introduce a variety of shops
- There has been far too much emphasis on chain store and restaurants
- Bromley needs more innovative local businesses and shops
- Less focus on restaurants at the price of public space
- Review Bromley's business rates and actively encourage independent businesses to set up in the centre
- The retail core area should be reduced
- Ensure empty shops are not left vacant for too long (offer discount)
- Get bigger names into the town centre
- It needs to adapt to changing circumstances
- Access for wheelchair users
- Ensure that the toilets in the glades are regularly cleaned/monitored
- Maximise the flexibility of retail space to be used as a variety of commercial uses in order to reflect the direction of travel set out in the emerging Planning White Paper, which encourages flexible commercial space through the new Use Class E
- Think about community spaces and venues that people can use to sell homemade items
- Stop cars driving down East Street so this could become a road of interesting places to eat and drink
- The Town Centre should develop more of a market town feel
- Small independent shops should be actively encouraged to set up in Bromley
- Bromley does not make enough of its historic links with HG Wells. The Bell is mentioned in Jane Austen's *Pride and Prejudice*
- The SPD should ensure there is adequate flexibility for local businesses so they can adapt to the ever-changing retail environment
- Encourage other enterprises such as a climbing wall or escape room to diversify from shopping that can be done online

- A wider range of cultural and leisure facilities, community facilities and workspaces for entrepreneurs, start-ups and small businesses are needed
- A more mixed-use environment, with not just shops, is needed as the traditional retail outlets are lost to online shopping
- Restore the parks and provide more seating
- Consider facilitating regular farmers markets in addition to the regular food markets in existence

***Do you see the town centre as somewhere you can socialise?***

***YES – 18 Responses***

- The cinema, theatre and bowling alley are excellent
- The restaurant terrace has not reached its full potential yet
- More seating is needed
- Emphasise the parks in the town as they are great to visit
- The coffee shops are good
- It is so much more than a shopping centre
- Good to see the market in the High Street
- The Town Centre is better than it used to be
- Somewhere to meet friends and family
- Church House Gardens and Queens Gardens
- Create venues that combine community art galleries, live music and eating facilities

***NO – 18 Responses***

- Bromley is not a place to be at night
- The retail places are places to socialise but the town centre is not
- Street furniture could benefit the parks
- Too given over to low end drinking
- The night-time economy is strung out through the centre. Priority zones should be identified
- Bromley is just a bunch of shops and old housing
- Too much focus on pubs and clubs
- Improve to include more high end, independent restaurants or gastro pubs
- Bromley South has a large Wetherspoons and a large restaurant / club that is constantly changing
- Lack of a family/social feel
- The restaurants in Queens Gardens help
- Bromley nightlife mainly caters to young people looking for cheap entertainment and fast food

***What type of space is necessary to facilitate or improve the cultural and social role of Bromley Town Centre?***

- Community hubs for vulnerable people
- Have the market in one place
- More places that offer music
- Nightclubs
- Invest in Bromley Little Theatre
- More trees and planters

- More cycling storage
- Leisure spaces closer to town
- Increase pedestrianisation
- Organise more diverse events
- High Street currently feels very sterile
- More inclusive family friendly things
- A medium/high end marketplace food experience
- Focus around a town square type central point
- Less car access
- More high density centrally located housing
- Better open spaces
- There are huge vacant spaces between Bromley North and South
- Provide free parking like Bluewater
- Bromley is diverse and an community art work may help just pull people together
- Youth centres
- Clean, litter free, well maintained environment
- A more socially and demographically diverse residential offer in the town centre

***What leisure activities/facilities would you like to see in the town centre?***

- The cinema, theatre and bowling alley are excellent
- The facilities already exist
- Somewhere for young people to go
- Better pubs for over 25s
- Yoga facilities (indoor and outdoor)
- Social meetings for older people
- Community art projects
- Park gyms in green spaces
- Independent retailers
- A proper swimming pool
- More open spaces
- Keep Pavilion Leisure pool
- Better choice of bars to compete with Wetherspoons
- A water fountain to cool when hot, attractive, good for kids and relaxing
- Make Churchill Gardens like Beckenham Place Park
- A less traditional Theatre set up than the current Churchill Theatre
- Ice rink in winter
- Roof top cafes
- Activities and strategy to attracting a variety of people and not peppering around vacant shops
- Prominent signposting of all three central parks
- Tennis courts
- More greenery and play areas
- Community centre with multiple uses
- Outdoor theatre in Churchill Gardens
- Increased independent shops/cafes
- Trampolines for children
- Art Galleries
- Music studios particularly for younger people

- Improved support for suitable events existing cultural facilities
- Mini golf
- Invest in the public library

***Do you have any other comments in relation to retail, culture and leisure in Bromley Town Centre?***

- The Glades is still pleasant and well maintained
- Stop construction of high rise buildings
- Preserve beautiful heritage buildings and maximise their use
- Arts and crafts outlets
- Lower council rates to encourage independent shops
- Bring the Tram into town centre to make it more accessible
- Encourage pop-up shops
- Reopen the library toilets
- More shops connected to the needs of the community
- Redevelop it
- Refill centre/shop
- Bromley is a commuter town
- Create more sense of community in Bromley
- More emphasis on walking and cycling into the centre of town
- There is a gap in the homeware market
- Encourage greater use of last-mile deliveries by bicycle
- Bromley Little Theatre and Churchill Theatre should be supported and protected in the SPD
- Central Library is a much under-loved and under-used resource
- Engage with Churchill Theatre to have easily accessible cultural events on the High Street
- There need to be plenty of non-retail operations, e.g. gyms, cinemas, lockers, etc
- The music in some shops is often so loud that the buskers music gets drowned out
- Please make Bromley more competitive in terms of what shops are available
- It would be great to have a grocery store like Planet Organic or Whole Foods in central Bromley because there is no current option right now
- Needs to be a lot more creative thought put into the current offering for the town centre to thrive
- Culture, social, community, and leisure uses as well as small business use must be allowed to take the place of retail
- Ensure parking charges are low to entice residents into the town centre for shopping or other activities, especially families
- Buying an incredibly expensive sculpture of an elephant riding a bicycle has not benefitted the culture of the town

**6 Public Realm, Permeability and Connectivity**

33 responses received

***How inviting is the town centre public realm currently? What elements of the public realm do you think are good and bad?***

- There could be more green infrastructure
- The pedestrianised area of the high street works well
- The market is an asset and should be extended and enlarged

- There have been some improvements around Bromley North
- The play areas for children are good
- There is a sense of community
- The use of flower beds and benches just outside Lidl for the elderly and other members of the public to sit on
- The area towards Bromley north is cute but needs to be more accessible
- It does not feel safe cycling into Bromley Town Centre
- It is poorly maintained and full of litter
- Do not over pedestrianise
- There is little amenable outside space for socialising
- There are 3 design areas in the town centre which do not complement each other (Bromley South/Bromley North/Market Square)
- The totem pole street lights look awful
- The roads surrounding the centre are extremely busy and congested with little space for cyclists or walkers
- No cycle infrastructure or shared space
- High street by Bromley South is too busy with traffic and not enough space for pedestrians
- Some shops on the high street play their music too long and it interferes with the buskers
- Remove hostile urban seating
- Extend the pedestrianised areas
- The High Street is overly brash and commercialised
- It would be better to view the design and cost of improvements to the town centre as vitally necessary to better nurture the people there
- Disabled access is particularly bad on the Bromley North line

***What could be done to make the town centre a place where people will want to dwell?***

- More seating
- Better lighting
- More outdoor space
- Greater police presence
- Improve Bromley South
- Place interpretation boards to identify historic buildings
- Remove car access
- Safer cycle routes
- Increase pedestrianisation and ensure that there is plenty of provision for cyclists
- Provide more play equipment within the town centre rather than private fairground rides
- Ensure all areas are accessible for disabled people
- Refurbish the Mall
- Clean up litter
- There needs to be suitable provision for loos, washing and refilling water
- More social/community areas, more pedestrianisation and safe cycle routes with secure cycle storage with CCTV
- More independent shops

***How easy is it to navigate through and within the town centre?***

*Negative Comments*

- It is only easy for cars

- The market makes it hard to navigate
- The footpaths in Bromley South are too narrow
- Spaces are disconnected
- Hard to access on foot as surrounding roads are busy with traffic
- Hard for cyclists
- Library Gardens are not clearly signposted
- Palace Park needs better access and signposting
- It is not inviting to walk past the North part of the High Street
- More signage needed in the Glades (where exits lead to etc.)
- It is difficult if you are unfamiliar with the area
- The Upper High Street is poorly integrated
- Pavements are always crowded
- Market takes up a lot of pedestrian space
- The Palace Park needs signposting and waymarking for people to find their public park

### Positive Comments

- The signage is good
- More green links connecting the two parks would be good
- Bring greenery and garden architecture into dead space

### ***Do you have any other comments in relation to public realm, permeability and connectivity in Bromley Town Centre?***

- Have one theme through the town
- Live music is nice
- The positioning of the playground in Queens Gardens is so near the busy road
- Need to have better police and security presence at all hours as too many antisocial and criminal behaviours
- SPD guidance should be detailed enough to prevent a reoccurrence of the black slugs and totem-pole lamp posts
- 20mph speed restriction throughout the Borough
- Put people ahead of traffic
- Bring the Bakerloo Line to Bromley
- Introduce some Low Traffic Neighbourhoods
- Improved cycling infrastructure would be welcome to discourage car use, and more pedestrianisation
- Surrounding roads need to support active travel
- Lack of continuous cycle paths makes it hard to travel through Bromley
- Bromley South station is problematic for disabled people; taxis monopolise waiting areas and no place to pick up disabled passengers
- Safer pavements and crossings for pedestrians
- Plants on roofs of buildings
- Increase permeability

## **7 Historic Environment**

38 responses received

### ***How important is the historic environment to the character of the town centre?***



- It is important to keep historic features whilst also adapting for the modern world
- Many of the historic buildings have already gone, beginning with the White Hart
- The historic environment is very important to ensuring a distinctive character to the town
- Please consider carefully the impact that large (particularly high-rise) developments have on the conservation areas which directly connect to the areas of proposed development
- During lockdown the sense of local space became even more important
- Bromley's unique character comes from a mix of historical buildings, green spaces, and architectural style
- It sets it aside from other shopping centres
- There is nothing in the town that celebrates Charles Darwin or HG Wells
- The historic look of Bromley, of a Kentish market town, will be important to the development and recovery of Bromley after Covid
- This could be used to make Bromley an attractive environment to live, socialise and work in
- It is vital to the distinctive nature of its town centre, so different to those adjacent
- The heritage buildings add to character of the town
- As high streets increasingly become destinations as well as retail opportunities this will become much more important

***What elements of the historic environment do you consider most important?***

- More permeant plates to indicate links with former times
- The listed buildings and locally listed buildings in the Conservation Area
- Statues, ponds and the ice house area have been shamefully neglected
- Open and public spaces
- Former Maplins building on the corner of Ethelbert Road and High Street
- Keeping the library and Queens Gardens intact
- The buildings and layout of the town are part of its identity
- Laura Ashley building on the corner of Ringers Road and High Street
- Architecture
- Parks
- The Conservation Area buildings
- 17th Century Colleges and Bishops Palace
- 1930's buildings and former Gaumont Cinema
- Character of streets and local history awareness
- All older buildings that have character should be retained and, where appropriate improved
- East Street character
- Bromley North old town character
- Palace Gardens

***How can development be accommodated without causing harm to the historic environment?***

- Keep scale appropriate
- Consult with historians before deciding to sell/renovate/demolish historic buildings
- Leave some of the special areas as they are
- Do not development historic buildings
- Convert old buildings, do not destroy them
- New development must respect historic setting
- Avoid high rise amongst buildings in the High Street

- New development adjacent to the Conservation Area should not be tall
- Careful and sympathetic planning
- SPD should be prescriptive so that the historic Kentish town look and feel is enhanced
- The value of heritage as assets to the community and its future prosperity needs to be better recognised by the council and in its planning decisions
- Development should focus on refurbishment of existing facades, even if the internal area is replaced
- SPD should give detailed guidance focused on protecting the historic environment
- Development of one particular use or design type should not be focused in one area
- Use vacant retail premises for community and cultural uses
- All historic buildings (and interiors) should be preserved and adhere to the SPD for guidance
- Buildings should not overlook or impact upon Conservation areas or open spaces in the town

***Do you have any other comments in relation to the historic environment in Bromley Town Centre?***

- Bromley can be modern and have history like Croydon
- Much of Bromley's history has already been lost
- Bromley is losing its character
- Toilets need to be restored for public use
- A car less centre has been a great success
- Links to the Civic Society should be encouraged
- The Bell Hotel should be developed and preserved
- There needs to be more sympathy for existing architectural features
- The history of the town should be celebrated
- Notice boards with information about historic sites would be good
- Walking tours could be advertised
- The historic and cultural environment of Bromley has been neglected for decades
- Encouraging to see the redevelopment of the old cinema into the Picturehouse
- Bromley Council should be more respectful of Bromley's historic environment
- Information on the history of the town should be readily available so people are more aware of local heritage
- Bromley's 'heritage offer' needs to become much more used in the recovery and future of Bromley Town Centre
- Development should be sensitive to historic buildings but should also improve the historic context

## **8 Green Infrastructure**

88 responses received

***Do you think provision of green infrastructure in town centre locations is important? What advantages and disadvantages does green infrastructure bring?***

*Advantages*

- Improve air quality
- Reduced harm to those with health problems
- There are no disadvantages

- Green infrastructure attracts people and makes them stay longer
- Encourages healthy behaviours
- Trees provide shade to keep areas cool in the hot weather
- Mental health and wellbeing
- More cycling infrastructure and pedestrian networks
- It makes the area attractive
- Help offset the loss of biodiversity
- Green infrastructure is vitally important to alleviate the impact of climate change
- Bromley's green spaces make the town distinctive
- Green infrastructure should not restrict further development coming through
- All development should address how it will increase tree/plant cover to help combat pollution
- Positive contribution to sustainable high quality urban areas

### Disadvantages

- It is costly

### ***What type of green infrastructure do you think is most suitable for Bromley Town Centre?***

- Provide water fountains in the town centre
- Open up and improve area near Mill Lane
- Greenery not concrete
- More trees and well-maintained formal displays
- The planters on pedestrianised areas look neglected
- Spaces that mix sitting/socialising in a green environment
- A network of green spaces
- More greenery in Bromley Town Centre
- Wildflowers in gardens
- Discourage car use
- Cycle lanes
- Less traffic
- Put a refill centre in the town centre
- Ensure all new builds have solar panels
- Recycling provision
- Renewable energy regeneration
- Solar panels on buildings
- Ensure all shops follow recycling guidelines
- A better system of communication

### ***Do you think there are any opportunities/locations where new green infrastructure could be provided in Bromley Town Centre?***

### Sustainability

- Electric vehicle charging points in all car parks
- All buildings should have their own PV/green power supplies
- Green roofs could be considered at the top open floors of car parks
- Water bottle refill stations
- More walking trails from Beckenham to Bromley to avoid main streets and cars

### Public Realm/Open Space

- When buildings are demolished part of the land should be given to green space
- Invest in neglected open spaces such as kids playground
- Town Centre does not have enough green infrastructure
- Sections of the paved pedestrian areas could be broken up to provide areas
- New build developers should apply for a visible green addition to the application
- Green walls, roofs, solar panels, swift and bat bricks in new builds
- Decanalise River Ravensbourne
- Area in front of Bromley South would benefit greatly from green planting
- Replant the palm tree Green gardens in schools to grow their own vegetables
- Use parks in Bromley to provide new green infrastructure
- Planting should be considered wherever practical
- More wild areas to encourage biodiversity
- The Garden in the Civic Centre could be used better s in the central reservation of Kentish Way and irrigate them
- 

### Other Comments

- Build a new environmental education centre to get people interested
- Be the change and lead the way
- Many local action groups will want to work collaboratively
- More trees will soften the ugly modern buildings but should be accompanied by proper maintenance schedule
- Bromley could pull together representatives from many Bromley and nature groups and discuss suggestions to take forward
- New funds should go towards maintaining Martin's Hill and Churchill Gardens
- Put a green wall on the front of Churchill Theatre where the slate tiles used to be

***Which, if any, open spaces in and around the town centre do you currently use, and why?***

### Palace Park

- Good to play football
- Good for walking

### Norman Park

- Good to run in
- Good for cycling
- Dog walking and socialising
- Clean, big and great for wildlife

### Queens Gardens

- Hard to access and not well signposted
- The playground is good for children to play in
- A nice walk through to town centre
- Great to relax in

- Regularly use for exercise
- Good seating
- Good to walk in
- Screen the children's playground

### Churchill Gardens

- Nice to walk in
- Accessible from Bromley High Street
- Convenient as it is close to Bromley High Street
- A big and pleasant space
- Good to watch wildlife and enjoy nature
- The only real open green space
- Great to relax in
- Quiet to sit and have coffee
- The amphitheatre could be better used and maybe even a cafe or kiosk and seating
- Good to go with children (but there is an ongoing litter problem)

### General Comments

- Parks in Bromley are relaxing and quiet
- Good for running, cycling and walking the dog
- Open areas are a good connection to nature
- Martins Hill has acid grassland which is interesting for wildlife
- Library Gardens and Martin's Hill because they are havens from the busy High Street with pleasant views
- College green is lovely to spend time
- Queensmead Recreation Ground is good for recreation, leisure and socialising
- Wildflowers and less mowing would make these more attractive
- Good to connect with history of Central Bromley and more natural landscape not normally found in urban landscape

### None

- Parks do not feel safe
- Parks are not clean
- Lack biodiversity
- No local parks (BR2) where it is possible to sit with friends
- There is too much litter, and the wardens don't monitor
- I prefer to drive to Petts Wood/Chislehurst/High Elms

***Are there any open spaces in and around the town centre you do not currently use, but would like to? What changes would make you more likely to use this open space?***

### Palace Park

- Preserve public access
- Signpost the park and make it more accessible
- Provide with its own wheelchair friendly kissing gates
- Verges should be used to grow more plants and increase greenery

- Clearer signs about when this park is open to the public
- Open it up so more people are aware of its historical importance

### Queens Gardens

- Better signage
- The playground is way too close to the polluted main road so can't be used
- The playground should be moved or screened with 2.5m high green ivy

### Norman Park

- Wide verges adjacent to hedgerows should be managed
- River and riverside is pleasant but the grass cutting is too close to the river

### Churchill Gardens

- Re-open the toilets
- Reinstate the pond and surrounding sitting steps in Churchill Gardens and use it for outside shows
- Balcony from Churchill theatre overlooking the park could be used so much better and be a great AI fresco space
- Outside arena could be a fantastic space as used to be years ago for shows/concerts and music events
- Signpost the park and make it more accessible
- Water refill points should be available in all green spaces
- Churchill Gardens could be improved with better plants and maintenance of flowers
- The litter needs to be cleaned up
- Clean the water in the ponds
- Ensure the playground sand is cleaned and maintained
- More public art and/or water feature
- More police presence
- Better access to Church Road at the end of Church House Gardens
- The Skate Park in Churchill Gardens is good but scary for younger children
- Plant more around the concrete area to encourage people to walk through/around

### Other Comments

- All parks should be made more user friendly
- All surrounding green parks going down to Shortlands
- Open spaces should have refreshment facilities that do not detract from the beauty of the park
- Introduce fixed trails for children to follow linking all of the green spaces in Bromley
- Re-wild the River Ravensbourne in Queens Mead
- College Green is not used and should be developed into a pleasant space

### ***Do you have any other comments in relation to green infrastructure in Bromley Town Centre?***

- Bromley Town Centre should be innovated with vertical green walls/gardens especially in the built-up areas

- Get the community involved in the planting of green infrastructure and you create places that people take pride in and care for
- Bromley can use its green spaces to stand out from surrounding centres such as Croydon and Bluewater
- The Ravensbourne river needs the land above/around it to remain green, so the water table is not interfered with
- Areas that are protected from air pollution and are safe to travel to
- Green infrastructure is the lynchpin to making Bromley beautiful
- The black plastic seating is atrocious and brings no aesthetic qualities to the streetscape
- The playground in Queens Gardens by the main road is too close to the main road
- Development in the town centre should be considered on brownfield sites
- Don't use male birch as this exacerbates allergies
- A lot of grass verges could be replanted with wildflowers to encourage biodiversity
- Bromley ignore any voices and run useless surveys
- Engage citizens in adopting trees and greenery near them to help water etc
- There are flooding issues around the triangular flats on Engelbert Road
- Beehives on the top of offices
- Provide drinking water fountains and bottle filling facilities in all public open spaces
- All new developments should be designed to collect rainwater for flushing and watering
- Bins in public spaces should have a fixed top to stop foxes accessing them and spreading litter

## 9 Environment and Air Quality

78 responses received

***What actions do you think could be taken in order to reduce carbon emissions?***

### General Comments

- More local awareness is needed
- Bromley Councillors are not taking this seriously
- There is no problem with carbon emissions and trying to control them is pointless
- Making it safer for people to walk and cycle to school, the shops and work
- Ensure there is plenty of recycling points
- Introduce air quality monitors to provide clear evidence about ambient air quality
- Incentivise the use of non-fossil fuel transport
- Enforcement to ensure the development of the circular economy and sustainable waste management
- More focus on green infrastructure
- Locker facilities so that people can shop and store until ready to go home rather than carry shopping around Bromley
- Increase green planting with ivy walls, roof gardens and more appropriate planting rather than ornamental planting
- Encourage more shopping from home via the internet so reduce footfall in Bromley Town Centre
- Limit the height of buildings
- Refer to local specialist input
- Build a refill centre
- Funding vegetable growing gardens in schools

### Public Realm

- Make roads and pavements safer
- Upgrade all streetlights to LED
- Pedestrianising more areas of Bromley Town Centre including East Street at the Bromley South end of the High Street
- Installing secure cycle racks beside schools, shops, and stations
- Increase the number of trees, green walls, and native planting

### Energy

- More solar panels where possible to reduce energy carbon footprint
- Ensure all council offices and any other public buildings are on Renewable Energy Tariffs for energy
- Encourage solar panels on shop and office buildings if they can be installed without detracting from the architecture
- Businesses should be encouraged to conserve heat during winter months and not overuse air conditioning during the summer months
- Making use of decarbonisation fund for older buildings
- Require photovoltaic electricity generators and solar heating panels to be placed on all new developments
- The Council should encourage and incentivise businesses and households to become carbon neutral
- All buildings must be retrofitted with insulation, and the Council should make the most of all government grants available

### Transport

- Make roads and pavements safer
- Reduce local speed limits to 20mph
- Introduce more EV charging points
- Encourage public transport use and active travel
- Low traffic neighbourhoods
- Get the council's waste (Veolia) and green space (IdVerde) sub-contractors to use electric
- Public transport should not use diesel fuel and there should be grants made available to upgrade vehicles concerned
- Discouraging unnecessary motor vehicle use
- Segregated cycle lanes
- Restrict non-essential traffic
- Stop giving priority to motorists
- Free parking for electric cars

### ***What actions do you think could be taken in order to deliver air quality improvements?***

#### Enforcement/Monitoring

- It needs to be taken seriously by Bromley councillors
- There are very few air quality problems in Bromley, and no actions are justified on a cost/benefit basis
- Install more air pollution monitors that can be live fed back to the public



- Greater control/enforcement of clean air provisions
- Take some action about the queuing at Waldo Road tip

### Green Infrastructure

- Promote green energy (nuclear energy is not really green)
- Plant more trees, hedges and ivy screens
- More emphasis on green spaces and improving wildlife habitats
- Improved green waste collection would reduce the need for bonfires
- Increase green spaces with filter air e.g., green roofs
- Identify suitable locations for green roofs and green walls
- Continue to promote green spaces and organic farming
- Allow residents near the centre to plant wildflower meadows and trees on wide verges

### Information/Incentives

- Aim an information campaign at school children so they understand pollution caused by traffic
- Consider a workplace parking levy to fund town centre improvements and discourage unnecessary commuting
- Advertising campaigns and financial incentives to firms/individuals who do the right things
- Promote local producers and independent shops

### Public Realm

- Pedestrianise more areas of Bromley Town Centre including East Street at the Bromley South end of the high street
- It would be better to relocate the children's playground to the back of Queens Gardens away from idling traffic and pollution

### Transport

- Give priority to active travel
- Make it safer for active travel to work/school/shops
- Provide more secure cycle storage at shops, schools and station
- Install more EV charging points
- Resolve congestion at traffic light junctions
- Encourage people to turn off their engines when cars are stationary
- Remove speed ramps in residential areas and reduce the speed limit so that driving is at a steady, fuel-efficient level
- Prioritise public transport
- Individuals should be able to get grants towards owning a bicycle or ensuring a current one is fit for use
- Turn off diesel engines and introduce fines for those who do not comply
- Encourage electric vehicles with more fuelling points
- Limiting access hours for fossil fuel vehicles to school roads / high streets during set times
- Greater transport infrastructure
- Increase train/tube links with Central London
- Higher parking fees for fossil fuel vehicles (or reduced fees for electric vehicles)
- Secure and CCTV-monitored bike storage must be available across the whole Borough

- Make cycling routes safer
- Place restriction on use of cars in the town centre
- Encourage a free park and ride scheme at Christmas to encourage people to park further afield

***Do you have any other comments in relation to the environment and air quality in and around Bromley Town Centre?***

*Enforcement/Monitoring*

- Restrict fires to Bonfire night
- It would be great to see investment in air quality monitoring and education around active travel
- Bromley Council should install a network of live air quality monitors that can be accessible online
- There needs to be a long-term plan for how the area will work for the residents, businesses and visitors
- Ban smoking and vaping
- Housing recycling and refuse collection needs closer supervising

*Transport*

- Less traffic
- Without a plan to encourage cycling and walking it will be impossible to reduce car use and improve air quality
- The traffic and therefore air quality on Beckenham Lane is appalling
- People should be encouraged to use public transport
- Bromley needs to be made more attractive to walk and cycle (wider pavements etc)
- Implement Park and ride schemes
- Reduce speed in built up areas
- There should be traffic calming measures for College Road
- There are too many flats which makes infrastructure for sustainable transport (EV charging points) difficult to implement

*Green Infrastructure*

- Care for the environment
- Continue to plant trees and replace those that fall
- Increasing the trees along roadsides will deliver shade
- Effort would be better invested in the towns green space and heritage

*General Comments*

- The air quality in Bromley is poor
- Bromley Town Centre is not very green
- Planning approval is low for zero emissions replacement buildings
- The initial draft of the Air Quality Action Plan 2020 does not have clear and measurable targets
- Bromley needs to stand out from other boroughs as the cleanest and greenest
- Air quality has improved during lockdown due to lack of congestion
- It is very poor especially in the roads immediately adjacent to the town centre

- Free water refill and drinking fountains will reduce plastic waste
- Planning permission shouldn't be required for secure cycle storage in front gardens
- Tighter regulations on new businesses/buildings being more energy efficient
- Littering is an increasing problem

## 10 Development Opportunities

55 responses received

### ***What is special/unique about Bromley Town Centre?***

#### Transport

- Great transport links
- The pedestrianised areas
- The traffic free centre goes some way to making Bromley a nice place to be in

#### Open Spaces

- Great green spaces
- Parks and green spaces should be preserved
- The view of Keston Ridge

#### General Comments

- Family friendly
- The physical condition of the town centre is decent
- Bromley is spacious

#### Development

- Independent businesses
- Low level development
- There are lots of opportunities to develop homes
- A variety of shops and activities
- The Churchill Theatre and Central Library are very important
- Bromley is spacious
- The older buildings give it distinctive character
- Bromley North has been well preserved
- The market should be developed and supported
- The area is a desirable place to shop
- The SPD should reinforce development to the south of the town centre as a visual gateway and optimise the use of land and opportunity
- The Railway Pub building and Bromley North Station facade
- Encouraging sustainable local businesses considerate of the natural environment and locally produced products
- the unique selling point of our high street (north and south) is that it's a historic Kentish market town, with great heritage buildings
- There is a young and diverse community feel
- There are a breadth of products and services on offer

***What aspects of the town centre do you think are integral to the character of the area?***

Specific Areas

- East Street
- Market Square
- Bromley South Station
- The Medhurst Building is lovely - underused ruined by Primark
- Churchill Theatre
- The Market
- The Library
- Bromley North has been redeveloped and is much improved with a village feel to it

Other

- Do not replace any buildings
- There is no character to the area
- The sense of arrival to Bromley Town is very poor
- The A21 loops rounds the town centre effectively cutting off the town from the area to the east
- It's on a hill which should have good views over the surrounding area
- Pedestrianised areas
- Restaurant and bars areas
- The busy atmosphere of the High Street that supports a variety of land-uses
- Proximity of theatre/library and park to the high street shops
- Low rise development
- Heritage buildings and open spaces
- Trees
- The parks
- The historic buildings
- Conservation Area
- Homes for wildlife and trees and shrubs helping keep the air clean and cool
- The mix of unique buildings, the Market Square area, the view looking down the High Street towards Bromley South
- The pedestrianised high street and green space around the Churchill Theatre is integral to the character of the area

***Are there particular areas within the town centre that have a specific character that particularly warrants further guidance?***

Specific Areas

- The conservation area
- North Street
- Bromley North Village
- Bromley South Station
- The Old Bell Inn should be redeveloped
- The Old Town Hall
- Churchill Gardens

- Parts of opportunity Site G/10 are not within the Conservation area but need to be considered for protection
- The Local Plan development proposals of the Y buildings at the Civic Centre site assumed to be permitted development are now found to need planning permission
- The Civic Centre Area is a short walk from the Town Centre but is made quite isolated by the busy A21
- Market Square has so much character and should be left alone
- Protect Picturehouse Cinema from development

#### Other Comments

- More greenery on the high street to soften the impact
- The green spaces adjacent/close to the High Street - which need protecting
- The mid-late Victorian housing around Bromley Town Centre should be protected
- Keep the old market town character
- East Street and the north end of High Street from the Royal Bell upwards are the most characterful places in Bromley town centre and should be the targets for conservation
- Any development here should be respectful in character to not stand out
- Concentrate on supplying family accommodation instead of flats with no outdoor space

#### ***Do you have any other comments in relation to development opportunities in Bromley Town Centre?***

#### Positive Comments

- The Hill Car Park is a good development opportunity
- More encouragement required to redevelop shabby areas between Elmfield Road and Bromley South
- Derelict offices by Bromley Police Station could be turned into a world class suburban cultural destination
- The Glades restaurant terrace has fallen flat - reduce rents to fill the units
- Bromley Town Centre is the perfect spot for high density modern housing
- There should be more development opportunities in Bromley Town Centre because it is a metropolitan area
- Bromley should be looking to present itself as the affluent and diverse borough it is by putting more effort into the town centre
- Bromley Little Theatre should be helped with their rebuilding

#### Negative Comments

- No more high-rise development
- There is too much emphasis on new build development
- The development at Bromley South is not attractive
- Do not lose green space
- The masterplan as it stands shows very little imagination
- Do not make Bromley the new Croydon
- The Masterplan shows very little imagination
- Bromley Town Centre does not need any more shops or offices

#### Other Comments

- Encourage public transport use
- More cycling infrastructure
- Public transport is not an adequate replacement for private car use
- There needs to be a long-term vision for building flats that are nice to live in for long periods of time
- New development should respect the existing scale and character
- Development opportunities should be at the appropriate scale
- The existing scale and historic nature should be preserved
- Keep all new developments low rise
- Use innovative green planting
- Encourage remote working hubs for local workers where working from home is impossible or difficult
- Unused office space could be converted to become affordable housing (with caveats)
- New housing must be part of a community plan
- Expand the market to include farmers markets
- New development should be low key and respect the historic character of the town
- Allow the community to borrow and utilise empty shops at community prices
- Use church halls for food sales, car boot sales any other ideas the community suggests
- All new developments should have solar panels and heat pumps (not gas boilers)
- Limit the height of new development to five storeys
- There are already too many empty offices. Affordable housing is much more important
- All development should be carbon neutral