CONTENTS

EXECUTIVE SUMMARY
1.0 INTRODUCTION
2.0 EQIA METHODOLOGY
3.0 KEY FINDINGS FROM BASELINE REPORT
4.0 KEY FINDINGS FROM ADDITIONAL STATISTICS
5.0 EQUALITIES POLICY REVIEW
6.0 EQIA SCOPING ANALYSIS
7.0 INITIAL EQUALITY IMPACT ASSESSMENT
8.0 CONSULTATION
9.0 SUMMARY OF PROPOSED SUBMISSION DRAFT AAP
10.0 EQUALITY IMPACT ASSESSMENT OF PROPOSED SUBMISSION DRAFT AAP
11.0 FURTHER CONSIDERATIONS
12.0 CONCLUSION

APPENDICES

APPENDIX A - DRAFT EQIA MATRIX
APPENDIX B - EQIA SCOPING REPORT CONSULTEES
APPENDIX C - FINAL EQIA MATRIX
EXECUTIVE SUMMARY

i. As part of the ongoing development of an Area Action Plan for Bromley Town Centre, a Proposed Submission AAP has been prepared and will be the subject of consultation prior to submission to the Secretary of State. Any comments received have to relate to 'legal compliance' and the 'soundness' of the plan. The legislation sets out three tests of soundness. In order to be “sound”, the AAP has to be:

- Justified- It is founded on a robust and credible evidence base and offers the most appropriate strategy when considered against the reasonable alternatives.

- Effective- It is deliverable, flexible and able to be monitored and identifies how the proposals will be implemented.

- Consistent with policy- It is based on the policies and proposals set out in the UDP and it conforms to relevant national planning policy statements, and regional planning policy objectives, as set out in the London Plan.

ii. Informing the move from preferred options to this Proposed Submission AAP has been a full assessment of the impact on all residents, workers and visitors in the town centre and wider borough of Bromley.

iii. The statutory consultation process at each stage of plan preparation has been supplemented by an Equality Impact Assessment (EqIA) process which has been developed to consider in detail the needs of, and impacts on, specific target groups residing in, working in, or visiting the town centre.

iv. In line with guidance issued by the Greater London Authority, these groups include:

- Young People and Older People
- Disabled People
- Black and Minority Ethnic Groups
- Faith/religious groups
- Females
- Lesbian, Gays, Bi-sexuals and Transgender people

v. Furthermore, due to the economic importance of the study area, an additional target group that will be considered as part of this assessment is low income groups.

vi. A full scoping exercise was undertaken as part of the baseline exercise for the selection of the Preferred Options. Drawing on the conclusions of the scoping exercise, the target groups relative to the AAP study area were identified and a full equality impact assessment of the preferred options for the AAP was carried out, including a postal consultation process. The outcomes of this assessment are summarised in Chapter 7 and in the matrix reproduced in Appendix A.

vii. At this first stage of assessment, no unlawful discrimination was identified; however, a number of areas within the AAP were recommended for further exploration to ensure potentially adverse impacts on key equality groups were mitigated against and every step taken to provide beneficial impacts on key equality groups wherever possible.

viii. The recommendations made by EqIA at the Preferred Options stage were fed back to the wider AAP team in order to inform the preparation of policies to be included in the draft AAP.

ix. In November 2008, a Proposed Submission draft AAP was published and subject to a wide consultation process. Feedback from this wider consultation process has been fed into a final assessment of the draft AAP on the equality groups identified – summarised in Chapter 11 and Appendix C.

x. Assessment of the Proposed Submission draft AAP identified no unlawful discrimination resulting from the draft AAP and no potentially adverse impacts. A number of further considerations were identified, however, for the Council and partners to take forward in the implementation of the AAP policies to ensure potentially positive impacts can be maximised.
Each of the stages of the Assessment is detailed in the following chapters.

1. INTRODUCTION

1.1. Bromley is a successful town centre and has seen many changes over the past 20 years. But time does not stand still and the Council have recognised that to ensure the town maintains its competitive position it needs to take a proactive approach in order to promote and manage change. Working with leading planning and regeneration experts EDAW, Bromley Council has been developing an Area Action Plan (AAP) which will breath new life into the town whilst preserving the best of the character that makes Bromley special.

1.2. The AAP will set out comprehensive proposals for future development and improvements and will establish the spatial and policy framework which will assist in achieving the objectives of creating a vibrant, thriving town centre; a quality environment and a safe community; providing accessible, safe and reliable public transport; ensuring a supply of affordable housing and providing a range of leisure opportunities.

1.3. Public consultation on the Preferred Options for Bromley Town Centre was undertaken over a six week period between January and February 2006. Following this, the Preferred Options were further developed to take into account the results of public consultation and further technical assessment of the likely impacts of the development proposals. In particular, the opportunity was taken to develop traffic modelling work to assess the potential impacts of the Preferred Options to ensure that the level, mix and location of proposed development and the objectives of the AAP can be accommodated. Consultation on these revised preferred options took place between October and December 2007.
1.4. The full details of the Vision, Objectives and Preferred Option for the AAP were made available to view at the Civic Centre and Bromley libraries or on-line at www.bromley.gov.uk

1.5. Building on the outcomes of the assessment of and consultation on the Preferred Options, a consultation draft AAP was developed in November 2008. This draft AAP established key policies for the AAP area to ensure that development within the town centre area ensures the optimum benefit for local residents, businesses and visitors and eliminates any potentially adverse impact of the development on key equality groups.

1.6. The draft AAP was subject to a consultation period from November 2008 until February 2009.

1.7. Feedback received during this consultation period was then fed into a Proposed Submission draft AAP which is the represents the final stage before formal submission to Planning Inspectorate.

1.8. The Proposed Submission draft AAP will be subject to a further six-week consultation period prior to formal submission.
Figure 1.1 – Outline of Study Area Boundary defined by Lower Level Super Output Areas compared with actual town centre

Bromley Town Centre Study Area Boundary

Legend
- Bromley Town Centre
- Study Area
- Building
- Inland Water
- Rail
- Road Or Track
- Structure

Data Source: Census 2001 / Ordnance Survey / Office of National Statistical EDAW

Map Source: © OS Crown copyright. All rights reserved. London Borough of Bromley (LA100017661 2006).

Last Updated: February 2008
2. EQIA METHODOLOGY

2.1. The methodology employed was in line with LB Bromley and GLA guidance. This was combined with a review of best practice of existing EqIAs throughout the UK and internationally.

2.2. Following the above guidance, there were four main phases to the Assessment. These were as follows:

- Gathering Information and Intelligence
- EqIA Scoping Assessment
- Consultation
- Final Assessment

Gathering Information and Intelligence

2.3. The first phase of the Assessment consisted of a desk-based review of the socio-economic baseline and scoping of pertinent legislation and policy to identify the key groups and emerging issues.

2.4. Using the socio-economic and policy reviews, key local groups (Equalities Target Groups) within the Equalities Strands were identified to assess impact. The included Equalities Strands are:

- Age
- Disability
- Ethnicity
- Faith/religion
- Gender
- Sexual Orientation
2.5. Furthermore, due to the economic role of the study area, an additional target group that was considered as part of this assessment is low income groups.

2.6. Comments from consultation were used in addition to the baseline and policy review to understand the issues of these key groups and the likely impact on them by the proposed AAP.

EqIA Scoping Assessment

2.7. The next phase combined the above information to complete an initial high-level scoping assessment to determine the level of potential impact of the AAP proposal on the key groups. This process included the use of a matrix designed to draw out the key issues identified in Stage I.

2.8. Using this scoring matrix, each relevant AAP component was compared against the equality strand, equalities legislation and related policy and the level and type of impact envisaged was identified.

2.9. The impact of each AAP component on the Equalities Strands was assessed classifying it according to it being positive, neutral or adverse, as demonstrated below:

- Potentially Adverse
- Impact – mitigation measure required
- Neutral Impact
- Positive Impact

Consultation

2.10. A considerable amount of consultation has been carried out as part of the development of the Area Action Plan. A review of the outcomes of this consultation took place as part of the Scoping
exercise for the EqIA, identifying any comments or issues arising from the consultation that were relevant to the equality target groups.

2.11. These comments were, subsequently, fed into the assessment of impact and the identification of intervention measures necessary to reduce any potential adverse impact on the equality target groups.

2.12. Any issues that required further investigation or further detail in order to assess the full impact or to identify the necessary intervention, were discussed through targeted consultation with appropriate stakeholders, service providers and advisors.

Final Assessment

2.13. In the final stage, the feedback was used by EDAW to amend the assessment matrix accordingly. Where highly significant negative impacts were identified in the EqIA, EDAW carried out a detailed analysis using information gained during the consultation stage, documents, reports etc. A summary of the overall impact of the AAP proposed is also provided.

2.14. EDAW then highlighted areas where mitigation measures will be necessary to ensure there is no risk of unlawful discrimination arising from the AAP proposed and the implication of the EqIA for the AAP was summarised in a short report.

2.15. The final output of the EqIA is a full report outlining the potential impact of the AAP options, clearly showing how the preferred options were chosen and identifying any necessary mitigation measures that may need to be put in place to remove potentially unlawful discrimination.
3. KEY FINDINGS FROM THE BASELINE REPORT

3.1. An assessment of the socio-economic and demographic statistics available for the proposed AAP area and LB Bromley has been undertaken to create a profile of the residents living in and around the Bromley Town Centre site; including those working in or visiting the town centre.

3.2. Using the study area provided in the Baseline Report, a study area composed of Census 2001 super output areas\(^1\) was developed. This area includes all super output areas which lie entirely within the Baseline study area as well as super output areas in which the majority of the residential use of the area was judged to fall within the Baseline boundary. This is illustrated in Figure 1.1.

3.3. For the purpose of the Equality Impact Assessment (EqIA), pertinent statistics regarding ethnicity, age and housing were extracted from the Baseline Report. In order to capture a further range of equality issues additional statistics on disability, gender and religion were collected from Census 2001. For the purpose of this report, we have insufficient reliable data relating to the Borough’s Lesbian, Gay, Bisexual and Transgender (LGBT) residents.

3.4. This section provides a summary of these socio-economic and demographic statistics that relate to equalities issues in order to identify the target groups of this EqIA.

3.5. The study area is found to have a similar proportion of white people as England as a whole. The other ethnicities that have over 1% of the population are Chinese, Black/British African, Black British Caribbean and Asian/British Indian. The Baseline Report does indicate a higher than average proportion of affluent

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\(^1\) Super Output Areas are a new geographic hierarchy used for the reporting of small area statistics in England and Wales. The Lower Layer super output areas were used for the purpose of this report; they have a minimum population of 1000 people; a mean population of 1500 and are built from groups of Output Areas (typically 4 to 6) and constrained by the boundaries of the Standard Table (ST) wards used for 2001 Census outputs (National Statistics).
residents from Asian Indian and Chinese backgrounds living within the town centre area.

3.6. Within LB Bromley, there is a higher than average proportion of residents aged 30-64 and 64+ and a less than average proportion of residents aged 18-29. Within the town centre, however, there is a higher than average proportion of 18-29 year olds and a less than average proportion of residents in the 5-17 age group.

3.7. There is an above average level of home ownership in LB Bromley, Bromley Town and the study area and a lower proportion of social housing. The Baseline Report also indicates a need of 3100 social housing units to 2016 with approximately 945 already supplied. Regarding the study area, only a small percentage (3.35%) of LB Bromley’s housing stock is within the town centre.

3.8. The National Earnings Survey (2003) shows that the average weekly earnings of residents of Bromley is £635.86. This is high in comparison to London as a whole where the average weekly earnings are £604.53 and the national average, which is £484.86. Bromley has the 11th highest weekly earning of all London boroughs (The highest being City of London - £1,104.59).

3.9. Geographical analysis (using CACI ACORN statistics) within the Borough, in relation to the town centre site shows that the study area generally tends to attract higher earners. Those in the north of the area tend to be ‘larger affluent families’ who are likely to earn over £50,000 per year. Similarly, the east of the area has a relatively affluent population (likely to be earning between £40,000 and £50,000) although they are classified as ‘multi-ethnic young’. The south and west of the study area are classified as younger ‘educated urbanites’ and they are likely to be earning over £30,000 per year.

3.10. Analysis of ACORN characteristics of the areas within a 3 mile radius of the town centre such as Plaistow (north), Bromley Park (north west) and Shortlands (west) are all areas of ‘urban prosperity’ with the majority of residents earning between £30,000 and £50,000 per year. Petts Wood, to the east of the town centre, is predominated by ‘wealthy achievers’ who tend to be over 60 years of age with an income of over £50,000 per year.
Whilst St Paul’s Cray (also east of the town centre) has a population which is characterised as being of ‘moderate means’, with ‘blue collar roots’. Bromley Common to the south of the town centre and Mottingham to the north, are categorised as people of ‘moderate means’ who tend to earn less than £20,000 per year.

3.11. A key consideration in the AAP, however, will be the likely change in socio-economic profile in the area that will result from the significant increase in affordable housing.
4. KEY FINDINGS FROM ADDITIONAL STATISTICS

4.1. LB Bromley, Bromley Town and Study Area all have lower levels of residents with a long-term, limiting illness than England as a whole, with the Study Area having the lowest levels (13.58%).

Figure 4.1: Residents with a Long-term Limiting Illness

Source: Census 2001

4.2. Although LB Bromley has lower levels of males than England and London, the variation across all these regions is less than 1% (Figure 4.2). LB Bromley and the Study Area have proportions of lone parent households similar to England, while Bromley Town has relatively low levels (Figure 4.3). All of these areas have lower levels than London. Despite the lower levels, however, this remains a significant issue with over one in ten adults in the Study Area having a limiting long-term illness which often has much wider impacts.
4.3. LB Bromley, Bromley Town and Study Area all have similar levels of Christians to England as a whole, which is significantly higher than London. All other religions combined account for less than 10% of the population, leading to significantly lower levels than London of Muslim, Hindu, Jewish and Sikh residents (Figure 4.4).
The Annual Survey of Hours and Earnings for 2007 found that LB Bromley residents earn an average of £605.20 a week (gross). This is significantly above both the London (£553.30) and national (£460.00) averages (Figure 4.5).
LB Bromley, Bromley Town and the Study Area all have significantly higher levels of car ownership than London (Figure 4.6). Compared to England as a whole, LB Bromley has higher ownership, Bromley town has roughly equal percentages, and the Study Area has lower levels of ownership.

**Figure 4.6: Car Ownership**

In comparison to town centres in neighbouring Boroughs, Bromley Town has a relatively low level of crime compared to Croydon town centre but slightly higher than Bexley town centre. Perhaps unsurprisingly, the highest rate of crime relates to theft and handling (Figure 4.7).
Identification of Key Equality Groups

The preceding assessment shows that the Study Area has an average to above average socio-economic and demographic structure. Although there are no concentrations of minority or disadvantaged populations, the EqIA remains important as a means to ensure that the impacts of the proposal are assessed for all population groups, not just the majority.

The above assessment leads to the following key equality target groups which are likely to be impacted the most by the Bromley Town Centre Area Action Plan:

- Young People
- People in the 18-29 and 64+ age groups
- Minority ethnic groups
- Religious groups
- Residents with a disability
Women

Low Income Groups

4.9. It is also important to acknowledge the specific needs of Lesbians, Gays, Bisexuals and Transgender people. Although this group may be difficult to both identify and consult with, the issues relevant to these groups will attempt to be addressed throughout the assessment process.
5. **EQUALITIES POLICY REVIEW**

5.1. A full review of planning policy relating to the AAP proposal was undertaken as part of the development of the initial Baseline Report.

5.2. Furthermore, to understand the issues and policy considerations specific to the equality target groups included in this EqIA, a further review of key equality policies and legislation has been carried out at a local, regional and national basis.

5.3. The key findings of this review are summarised in the following section.

**Summary of Equalities Policy Review**

*Building a Better Bromley 2008 to 2010*

5.4. The Building a Better Bromley short-term plan for 2008 to 2010 sets out six promises for 2008-2010 which were identified as important to the local community. The promises set out are as follows:

- Safer Bromley
- Quality environment
- Vibrant, thriving town centres
- Supporting independence
- Children and young people
- Excellent council

5.5. The promises most directly related to issues of equality appear to be supporting independence and children and young people; however, there are equality issues throughout all.

5.6. The Safer Bromley promise includes enhancing future reassurance projects.
5.7. Under the priority of supporting independence, the document links with the Local Area Agreement stretch target of supporting 900 older people who are not eligible for services through the Age Concern Care Brokerage scheme; and the target to work with the Primary Care Trust to provide person centred living options for the remaining 60 people with learning disabilities living in NHS accommodation.

5.8. Youth within Bromley are targeted by a number of initiatives including improvements to a number of secondary schools; improving Special Education Needs provision and to extend the reach of children and family centres, expand the number of extended services offered by Bromley schools and develop the family support services offered by the Bromley Children Project to cover the whole borough.

Building a Better Bromley – 2020 Vision

5.9. The Council’s long-term sustainable community plan (March 2009) sets out a vision for the Borough by 2020 as a place where:

- people choose to live, study and do business
- everyone has fair opportunities to maximise their talents, life chances, independence and dignity
- people have pride, take personal responsibility and have respect for others
- communities and citizens have opportunities to be actively involved in delivering this vision as part of an innovative and vibrant local democracy
- public services are efficient and effective, supporting choice, influence and personalisation, but with safeguards for the most vulnerable
- what we all do locally is sustainable for the future wellbeing of our community.

5.10. Under the Safer Community theme, reducing the level of youth crime and victimisation is prioritised, as is reducing the levels of anti-social behaviour and nuisance.
5.11. The Quality Environment theme looks to improve walking, cycling and public transport, provision of safe parking and facilitating new leisure opportunities for the whole community.

5.12. There are a number of actions prioritised under the Children and Young People theme, including reducing the reliance on out-of-borough placements for pupils with special education needs and improved provision of preventative and positive activities for young people.

5.13. Overall improvements in health, reducing inequalities and improved access to services in the community and closer to home are two key priorities of the Health and Independence theme.

5.14. Of particular relevance to the AAP, and equalities concerns, is the Housing theme which prioritises a sustainable supply of new homes across all tenures and an increase in the number of properties adapted for people with disabilities.

5.15. The Involving Communities and Citizens theme aims to increase the percentage of people who feel they can influence decisions locally.

Equal Opportunities Policy Statement

5.16. The Equal Opportunity Policy Statement has the goal that ‘the Council treats all people with equal respect, concern and consideration and recognizes the contribution made to the community by all individuals. We strive to ensure that this belief is embodied in the way we provide services, in our employment practices, and how we work with our partners/agencies in the community’.

5.17. The Statement has a priority of ensuring a sense of safety by building a ‘cohesive community in which people respect, tolerate and understand each other’.

5.18. Bromley also aims to include all residents in the democratic processes undertaken by the Council and to ensure that everyone has equal access to their services.
5.19. The Statement also emphasises the priority of equality between age groups by demanding the opportunity for a fulfilled and independent life for all residents, particularly the elderly, and increased opportunities for youth to fulfil their potential.

5.20. Furthermore, the Statement has guiding principles for services, employment and community leadership. All principles revolve around an attention to equality of all residents of the borough.

**Equality Scheme: Turning Vision into Reality**

5.21. The Equality Scheme establishes the process which will be undertaken by LB Bromley in order to implement equality across all organizations.

5.22. The Scheme adopts the Equality Standard for Local Government and in 2008 is working toward ‘Level 3: setting equality objectives and targets’ and ‘Level 4: developing information systems and measuring against targets’.

5.23. The Scheme also sets the framework for assessment, consultation, monitoring, publishing and training for an impact assessment of the Council’s actions on equality.

5.24. In addition to the above local policies, a number of regional and national equality legislations and policy documents have been used to inform the assessment of the potential impact of the AAP on the key target equality groups including:

- **Sex Discrimination Act 1975**

- **Equality Act 2006**: including a revision to the SDA (above) to oblige public authorities to eliminate unlawful discrimination and harassment, and to promote equality of opportunity between men and women.

- **Race Relations Act 1976 Amendment 2000. Amendment Regulations 2003**: including a legal duty to promote equality of opportunity for Black and minority ethnic groups – even if this means more favourable treatment.

- **Disability Discrimination Act 2005**: including proactively promoting the involvement of people with disabilities in public
life – even where this includes more favourable treatment (including the funding of schemes). Also a need to show thorough consultation and involvement at the start of projects that will have significant impact on them, especially physical access considerations.

- Special Educational Needs and Disability Act 2001

5.25. It is essential to consider the bearing of the above legislation in relation to planning for and implementation of the AAP. This most recent legislation goes beyond preventing discrimination against people towards an obligation to actively promote inclusion and involvement.

5.26. Furthermore, the GLA’s Supplementary Planning Guidance for Equality and Diversity in London (October 2007) highlighted a number of areas of potential impact of new developments on the key target equality groups which have formed central considerations in the EqIA.
6. EQIA SCOPING ANALYSIS

6.1. Following the methodology outlined in chapter 2, the potential impact of each of the elements of the AAP proposed on the key equality target groups was assessed. An initial scoping exercise was undertaken to determine the key headline equalities considerations that need to feed into the design of the AAP.

6.2. The AAP aims to achieve eight objectives which were developed in line with the Sustainable Community Strategy (2020 Vision, 2008) and the vision set out by consultation with stakeholder groups. These objectives, which will form the principles which are assessed in the following EqIA, are as follows:

- **OBJECTIVE 1**: Promoting economic growth and local employment opportunities- creating a prosperous economy and improving employment opportunities for benefit of Borough and London as a whole

- **OBJECTIVE 2**: Extending the range and quality of facilities and services- creating a vibrant, thriving town centre

- **OBJECTIVE 3**: Extending the capacity, range and quality of the shopping opportunity- providing for the needs of all residents and creating a more competitive town centre

- **OBJECTIVE 4**: Increasing the residential capacity within the town centre whilst accommodating future growth of town centre functions- ensuring housing meets local needs including ensuring supply of affordable housing

- **OBJECTIVE 5**: Protection and enhancement of the historic environment – protecting the character and distinctiveness of the town centre

- **OBJECTIVE 6**: Promoting high quality design and townscape improvements- enhancing the quality and character of the town centre
OBJECTIVE 7: Promoting sustainable development and minimising impacts on environment ensuring Bromley is an attractive place to live, work, visit and invest

OBJECTIVE 8: Improving transport and accessibility and encouraging use of more sustainable means of transport – ensuring use of public transport is promoted and provision is accessible, safe and reliable

Questions were identified in relation to meeting these objectives that are outlined in this chapter. Each of these questions has been strategically assessed against the components of the AAP. The detail of this assessment is given in a full matrix contained within the Appendix to this document whilst the key findings are summarised in the following section.

Many of the preferred options affecting equalities also affect the sustainability of the area. The EqIA therefore relates to the Sustainability Appraisal (SA) by viewing the relevant sustainability criteria of each preferred option alongside its potential for impact on the equalities groups and the measures necessary for them to have positive impacts.

Summary of Key Findings

The AAP includes strong provision for boosting the local economy through increased quantity and improved quality of the town centre offer in the AAP area. This includes an increased and improved retail offer as well as an increased and improved cultural, leisure and entertainment offer (including a night time economy).

LB Bromley state policy aspirations for the local economy to provide employment and training opportunities for people with disabilities which is something that the Council will need to encourage of all businesses. Aside from this, however, it is not
felt that this Objective is specific to the needs of equality target groups and, as such, should not be a consideration of this EqIA.
Community facilities

6.7. The current proposals for the AAP area include provision for around 1,820 new homes as part of mixed use development schemes to meet a range of housing needs.

6.8. Such a significant level of new residential provision will create a greatly increased residential population within the AAP area.

6.9. Whilst the current population of the town centre is skewed towards the 18-29 years age group, new residential development has the potential to change the demographic of the AAP area population.

6.10. With an increased residential community of a demographic differing from the current situation, it is essential that local services and facilities are supported to meet the extra demand arising. A particular concern relates to health and education services. Consultation suggests that these services are already operating to capacity and so will need additional resources in relation to staff and facilities in order to the extra demand arising from the new residential community.

6.11. In addition, the AAP area currently has a strong faith presence which will be directly affected by the AAP proposals. Consultation with these faith groups has recognised the importance of these faith groups within the town centre and highlighted demand for expanded provision wherever possible.

6.12. The supply of health services will be increased at The West of the High Street and the Corner of Ravensbourne and High Street sites where the AAP suggest adding up to 2,000 sq m of health use space.
6.13. There is also the possibility of a health and fitness club at the North West of High Street to Martins Hill site and a new doctor’s surgery in Site G.

6.14. A number of the sites include plans to improve the community and public spaces within them. The Bromley North, North West of High Street to Martins Hill, West of High Street and Bromley South all have up to 1,000 sq m of community space proposed.

6.15. The North West of High Street and West of High Street proposed uses include faith, meeting space and nursery uses. These uses could help certain gender, age and religious groups, but must be monitored to ensure that this does not occur at the expense of other groups.

6.16. The Civic Centre site will provide reconfigured civic offices which will improve the civic facilities, the civic frontage on Kentish Way, and the accessibility of the offices.

6.17. All new developments will need to be DDA compliant to ensure equality of access for all.
Cultural & leisure facilities

The conversion of The Pavilion into a retail area will require a re-provision of the existing leisure activities. This will be accomplished largely with 5,000 sq m or leisure space added to the Bromley Civic Centre site.

A 4,000 sq m cinema and the associated leisure uses will lead the redevelopment of the Westmoreland Road Car Park.
Another site with a large emphasis on culture is the Central Library, Churchill Theatre and adjoining area site. The AAP proposes this area become an enhanced cultural quarter that functions as a community hub and includes public facilities, meeting space and a new town square. The library and Churchill Theatre will both be improved and new entrances (including disability access) and facilities will be provided.

It appears that much of the new leisure space will be largely aimed at the largest demographic of 18-29 year olds. While this is not necessarily problematic, smaller age groups must not be overlooked in the provision of culture and leisure. It is also important to acknowledge the needs of an ageing population overall in the Borough who may rely on the town centre for access to a number of services and facilities.

Consultation with Bromley Mytime has also highlighted the important role that the existing access to a swimming pool has in ensuring older people exercise.

- What will happen in relation to leisure provision during the construction period of the redeveloped leisure centre? How will this be communicated to the general public?
- What should be included in the proposed Cultural Quarter? How can we make sure it is reflective of the whole community?
- Is there sufficient and appropriate leisure provision included in the AAP proposals to serve all sectors of the community?

OBJECTIVE 3: Extending the capacity, range and quality of the shopping opportunity- providing for the needs of all residents and creating a more competitive town centre

Supporting retail improvement and development

The stock of retail space in Bromley is fairly dated and demand has not been particularly high. The AAP proposes up to 50,000 sq
m of new retail space that will improve the quality of the area’s retail space and help to increase demand.

The largest developments of additional retail space are planned for The Pavilion site, where 22,000 sq m of new space will serve as a retail extension to The Glades (the area’s current leading retail site) and on Site G (west of the high street which is proposed for comprehensive mixed use retail led development that will include residential uses as and community, faith and health facilities.

The existing population in the town centre has a relatively significant representation of Asian Indian and Chinese population whose specific cultural retail needs should be met by the retail

- Is there an ethnicity or cultural dimension to the retail needs of the local population?
- How can we actively promote the ethnic diversity of the town?
- Are businesses run by black and minority ethnic people being engaged in the AAP process?

**OBJECTIVE 4: Increasing the residential capacity within the town centre whilst accommodating future growth of town centre functions- ensuring housing meets local needs including ensuring supply of affordable housing**

*Appropriate Provision of Affordable Housing*

The Baseline report (Fordhams, 2003) found that within Bromley, as a whole, there is an identified need for 3,100 social housing units to 2016 with an approximate 945 already supplied. Currently, the study area represents only a small proportion of Bromley’s total housing stock (3.35%), a statistic that will be addressed through the AAP.

The AAP preferred options provide up to 1,600 new residential units. Of this, it is proposed that 35% should be affordable
housing, of which there will be 70% social rented and 30% intermediate provision, in line with the current local policies.

**Appropriate mix of size, tenure, and accessible housing**

6.28. There are currently 1,000 residential units in the pipeline which are largely 1- and 2- bed flats. This is likely to be appropriate with the higher than average proportion of 18-29 year olds within the town centre, who would likely require this size of residence.

6.29. It is important, however, that a full range of housing typologies and tenures should be provided within the AAP area in order to promote a sustainable, diverse community.

6.30. LB Bromley’s policy aspiration is also to increase the number of houses which are adapted to fit the needs of disabled residents. The AAP has a role to play in encouraging such provision, including promotion of Lifetime Homes.

6.31. The majority of the residential units will be located in the West of High Street, Bromley South, and Bromley North sites although other sites do have some residential allocations.

- Will new homes be built to Lifetime Homes standards?
- Will family housing be built in the AAP area?
- What specific housing needs do Bromley residents need? How might these needs change as new housing is developed?
- How can housing typology help provide a mixed, sustainable community within the AAP area?
- Although the mix of housing is likely to be suitable for the large 18-29 aged demographic, how will the new development aim to encourage mixed communities?

**OBJECTIVE 5: Protection and enhancement of the historic environment – protecting the character and distinctiveness of the town centre**
Whilst this is a significant consideration of the AAP in general; the historic assets of the town centre are not related to any of the specific equality groups considered in this EqIA and, as such, it is not felt that this objective will have specific impact on the equality target groups and, as such, will not be considered by this EqIA.

**OBJECTIVE 6: Promoting high quality design and townscape improvements- enhancing the quality and character of the town centre**

A key concern of participants in the consultation processes has been of crime and anti-social behaviour in the town centre. Statistical analysis of crime figures suggests that Bromley Town ward has relatively low levels of crime in comparison to Croydon town centre, but higher than Bexley; with theft and handling providing the highest rates. The proposed increased residential accommodation, to be created within the town centre through the AAP, will increase levels of activity within the area throughout the day and night, helping to provide a more active mixed community environment.

LB Bromley policy aspirations, as set out in the Safer Bromley Partnership’s Community Safety Strategy (2005-08), also include an emphasis on reducing youth crime and anti-social behaviour.

One of the roles of the AAP is to ensure the design of the new development promotes a more secure environment that prevents crime and antisocial behaviour. This will be achieved through the incorporation of ‘Design out Crime’ techniques, natural surveillance and an increased residential population within the town centre.

The consideration of more use of CCTV within and around the town centre was a request of participants within the consultation process.

The AAP states that developments at the Former Town Hall & South Street Car Park, North West of High Street to Martins Hill, Bromley Civic Centre, Westmoreland Road Car Park and
Sainsburys West Street sites must consider scale, form and grain of surrounding buildings and area.

Where appropriate, such as the Bromley North Station, West of the High Street and Bromley South sites, developments may include taller buildings.

Many of the sites included in the AAP will create enhanced frontages of buildings onto High Street.

- What design techniques should be applied to the developments planned for the AAP area?
- What does this mean for residential/commercial/retail/open space/public realm development?
- Is there any aim to reduce anti-social behaviour and crime among youth as set out in the strategic documents?
- What measures should be put in place to reduce the level of anti-social behaviour (particularly amongst youths)?
- Do residents have any current safety or security concerns when in the town centre?
- Where are the anti-social behaviour ‘hot-spots’?

**OBJECTIVE 7: Promoting sustainable development and minimising impacts on environment ensuring Bromley is an attractive place to live, work, visit and invest.**

*Open space*

Bromley Town Centre has a number of open spaces that currently are not readily seen and have poor accessibility. The AAP aims to integrate these areas into the town centre in order to improve the environment of the area.

Additionally, the sites that open to parks and streets will be developed with sensitive frontages.
Aspirations for the Queens Garden will help improve the quality of the town’s open space by enhancing the landscape, improving the public realm, adding seating areas, improving pedestrian access and providing a venue for public art.

The AAP also includes the provision of public art at the Central Library, Churchill Theatre and adjoining area sites.

- What public art should be provided? How can it capture the culture and heritage of the AAP area?
- Where should it be provided?
- Based on the amount of new households there will be significant amount of new children in the area, will there be any new play/child space provided?
- In what form would residents like to see this space provided?
- How can we ensure that these spaces are accessible to all people including those with physical and visual impairments?

**OBJECTIVE 8: Improving transport and accessibility and encouraging use of more sustainable means of transport – ensuring use of public transport is promoted and provision is accessible, safe and reliable.**

*Improve access for all to essential services and facilities*

The AAP calls for redevelopment of both the North and South Stations, which will lead to improved and redeveloped rail stations and transport interchanges. They will also provide enhanced gateways into the town centre area.

The redevelopment of Bromley South Station includes an improvement to the accessibility for the mobility impaired. Further improvements to bus services will form part of an overall strategy for improving traffic management. This would encompass implementing a number of key initiatives to improve bus services and facilities within the town centre.
6.46. Many of the development sites call for improved access, both for vehicles and pedestrians, including the Town Centre Business Area traffic management scheme aimed at improving accessibility.

- What are the timescales for the redevelopment of the Bromley South Station?
- What accessibility issues do local residents currently have with the Station?

Appropriate level of parking provision

6.47. Whilst the AAP aims to encourage increased use of public transportation the Council need to provide adequate parking facilities. The town centre area generally has a high level of car ownership which also leads pressures on the parking spaces provided.

6.48. Re-provision and improvement of car parking will take place at the Bromley North, Westmoreland Road Car Park, and Bromley South sites. Bromley South will include lower parking standards for residential due to a high accessibility index. It is essential to ensure that this does not have a negative impact on those residents and visitors of the town centre that have a disability.

6.49. At the West of the High Street site the AAP provides a mixed use development proposal which includes 400 new spaces of car parking.

Provision of safe walking/cycling routes

6.50. The AAP requires many sites to improve and create pedestrian routes and linkages throughout the town centre.

6.51. The redevelopment of The Pavilion requires improved pedestrian linkages to Queens Gardens, with its own improvements, and also the provision of improved linkages across Kentish Way to the Civic Centre site.
6.52. The gateways created and enhanced by the Bromley North and South sites will also improve pedestrian access to the town centre.

6.53. The increased pedestrian accessibility in the town centre should also lead to more people on the street, promoting community safety.

6.54. How do young people currently travel to and around the town centre (i.e. to schools, leisure centres; entertainment venues, etc)?

- Would residents like to see more cycle routes, particularly to school and leisure locations?
- Would safe and secure storage/parking facilities for bicycles encourage further use?
7. INITIAL EQUALITY IMPACT ASSESSMENT

7.1. Drawing on the conclusions of the scoping exercise, a full equality impact assessment of the preferred options for the AAP was carried out. The outcomes of this assessment are summarised in the matrix displayed in Appendix A.

7.2. Whilst no unlawful discrimination was identified, there are a number of areas within the AAP that need further exploration to ensure potentially adverse impacts on key equality groups are mitigated against and every step taken to provide beneficial impacts on key equality groups wherever possible.

7.3. Each of these issues are summarised under the following headings below and will form the basis of targeted consultation with key equality groups and their representatives.

Social Infrastructure

7.4. The AAP calls for a significant amount of new residential space within the town centre. Going forward it will be important to examine the existing health, education, leisure and community facilities and determine whether they will be able to meet the increase in demand. Some new social infrastructure will likely need to be put in place. Additionally, care must be taken to ensure that facilities are still available throughout the development process.

Religious Facilities

7.5. The large majority of residents within the study area class their faith as Christian; however, in light of this it is important that other religious groups do not get overlooked. Faith groups of all types are a strong and cohesive aspect of the community and steps must be taken to ensure that this remains the case.

Disabled Access
The AAP is likely to have a significant impact on people with disabilities and consultation with disabled groups is essential in terms of assessing the accessibility of housing provision; travel; and road safety for people with various disabilities – particularly those with visual and mobility impairments.

Accessibility for disabled residents is an important aspect of both policy documents and consultation comments. Accessibility can be enhanced by ensuring the adequate provision of Blue Badge parking in the additional and enhanced car parks. Additionally, consultation demonstrated a large concern with accessibility problems at Bromley South Station. The AAP aims to manage many of the accessibility issues, but care must be taken to ensure that the residents’ concerns are considered. Finally, policy documents include an objective of improving job training and opportunities for disabled residents, and although the AAP does not explicitly mention this objective, development in the area should strive to achieve this goal.

Lifetime Homes

At present the town centre area provides a small proportion of the larger area’s housing stock, however, the significant number of new residential units provided in the AAP offers an opportunity to meet a number of needs of residents within the community. Development of the new residential units should include appropriate levels of Lifetime Homes, which also helps meet LB Bromley’s policy aspiration of more homes available for disabled residents.

Affordable Homes

Similar to above, the significant amount of new homes for the study area set out in the AAP provides a good opportunity to provide for residents’ needs through the provision of affordable housing. Considerable attention was paid to the issue of affordable housing in consultation, largely regarding its location. The new affordable housing units should be spread across the new residential development areas in an appropriate manner, leading to a strong, mixed use community.

Mixed Typology
7.10. A final concern relating to the additional housing within the study area is its mixed use nature. This has the potential to provide a diverse and thriving town centre, but additional attention must be given to the tenure, type and size of the new units. A strong emphasis on 1- and 2-bedroom flats may meet the need of the many 18-29 year olds in the area, but a variety of housing types need to be provided to ensure a sustainable, mixed community.

Design out Crime Issues

7.11. The study area does have a problem with crime and anti-social behaviour, particularly among younger people, and the aim of the AAP is to help fight this problem through good design. The increased residential development will lead to more activity on the street which will in turn help decrease the crime levels. The better integration and accessibility of the public realm and street frontages will also help design out crime. Furthermore, consultation provided the recommendation of CCTV in order to help reduce crime.

Retail Offer

7.12. Due to the economic role of the town centre in the wider borough context, it is important to ensure that the retail offer of the town continues to meet the needs of the local residents. Similarly, it is important to ensure that the town centre offer also meets the needs of the new communities moving into the AAP area; specifically as this new development will include a reasonable amount of affordable housing which has the potential to attract a new demographic of lower income groups to the area.
8. CONSULTATION

8.1. The initial equality impact assessment was subject to a postal consultation process in which the comments and views of a full range of equality group representatives were sought. The full list of consultees is given in Appendix B.

8.2. Four official responses were received and the equality issues arising from these representations are summarised as follows:

8.3. Bromley Mencap: were primarily concerned with ensuring suitable facilities for people with learning disabilities, including provision of accessible accommodation, close to shops, facilities and transport links. Mencap also raised a concern around the concept of shared space for cyclists and pedestrians, noting that this can cause problems for those with sensory loss, and requested that there be parking space for specially adapted vehicles. Bromley Mencap also urged the AAP to ensure appropriate toilet and changing facilities were made available in the town centre and that there be accessible health, leisure and fitness facilities, particularly swimming and changing facilities for people with complex or multiple disabilities. A final consideration raised was the need to incorporate space for special interest groups within community facilities.

8.4. Babbacombe Residents Association requested that new build residential housing be skewed towards those most likely to be car-free households, i.e. the elderly. The Association also suggested an increase in the level of affordable housing, stating affordable housing and good public transport and the prime objectives of attracting people to the town centre. They also raised a concern about the potential impact that additional population may have on their neighbourhood and highlighted the importance of maintaining historic assets. Further concerns included the need for additional clarification on detail and timing of improvements to the train stations and public transport.

8.5. Bromley Mytime expressed their agreement with the matters raised in the EqIA of the Preferred Options and stated their commitment to equality issues including provision of
concessionary prices for children, families, teenagers, disabled people and older residents.

8.6. Bromley Muslim Association highlight the need to provide dedicate facilities for the Muslim population, either as a purpose-built facility or as a large, flexible hall space with wash room facilities.

8.7. Furthermore, a number of representations were made from representatives of equality groups through the main consultation process carried out at the Proposed Submission AAP draft stage (see Chapter 8). The outcomes of both sets of consultation were fed into the final Equality Impact Assessment (see Chapter 8) of the draft AAP.
9. SUMMARY OF PROPOSED SUBMISSION DRAFT AAP

9.1. Work from the previous stages of plan preparation has informed the latest and final stage of the AAP which is the publication stage before submission to the Planning Inspectorate. This formal stage is known as The Proposed Submission - Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 amended 2008. This stage is prior to the formal submission stage and the document has to be made available for public inspection for 6 weeks.

9.2. The Proposed Submission draft AAP (from here on referred to as the draft AAP) document has been prepared following wide ranging consultation with key stakeholders and the public on the Preferred Options (January 2006), Revised Preferred Options (October 2007) and Consultation Draft AAP (November 2008-February 2009).

9.3. The AAP will provide a clear policy and spatial framework for future development to meet the identified growth requirements of the town. It seeks to deliver planned growth; stimulate renewal of the town centre; protect and enhance existing character and environmental quality and promote sustainable development and comprehensive improvements.

9.4. Following consideration of the representations received in response to the consultation draft AAP from November 2008-February 2009, a number of changes have been incorporated into the Proposed Submission AAP. These may be summarised as follows:

9.4.1. Reduction in the indicative capacity for residential development within the town centre from around 2000 units to around 1820 units. This follows considerations of the further representations received in relation to the proposed increase in the number of units in the Consultation Draft AAP;

9.4.2. Site A: Bromley North Station - Reduction in the indicative number of residential units to be provided as part of a mixed use
development scheme from around 400 to around 250. The number of units was increased in the draft AAP to reflect the strategic policy requirement to achieve the highest possible intensity of use compatible with local conditions. However, given concerns expressed about the potential impacts on the surrounding area, it is considered that the indicative figure of 250 units previously shown in the Revised Preferred Options is a more appropriate guideline for development. Developers will be required to demonstrate that the proposed development will not result in unacceptable impacts and will deliver the objectives set out in the AAP;

Site K: Westmoreland Road Car Park- Inclusion of a mix of residential and hotel use as an acceptable element of any future mixed use cinema led development and a reduction in the indicative number of residential units from around 270 to around 200. The recent marketing of the site has highlighted the potential to extend the range of uses and this will reinforce Bromley South as a leisure/entertainment hub;

Site L: DHSS building- The draft of an ‘Economic Development & Employment Land Study’, which was commissioned to underpin the Local Development Framework, has highlighted the importance of reinforcing the role of the office sector and the quality of accommodation in town centres. The former DHSS building contains unoccupied office space. It is therefore considered appropriate to include within the development options the requirement for an appropriate level of replacement office space as part of the mixed use development.

The most significant implication of the combined changes has been a reduction in the indicative number of residential units. However, the town centre would still have the capacity to deliver a significant element of the Borough’s housing requirements as part of mixed use developments and the impacts have been considered and assessed in the Transport Strategy and Sustainability Assessment. Both these documents set out mitigation measures that have been taken forward within the AAP.

Objectives
The vision for Bromley Town Centre has been translated into a number of key objectives which underpin the policies and proposals set out in the AAP.

The objectives have been developed in consultation with stakeholders and in the context of national and regional guidance and a rigorous assessment of the town centre’s needs and potential. They respond to the overall strategy for renewal of the town centre and clearly reflect the objectives of Bromley’s Community Plan.

**OBJECTIVE 1:** Promoting economic growth and local employment opportunities, increasing the quality of commercial floorspace and economic opportunities in the town centre for benefit of Borough and London as a whole.

**OBJECTIVE 2:** Extending the range, quality and accessibility of facilities and services to support a vibrant, thriving place that attracts people to live, work and play in the town centre.

**OBJECTIVE 3:** Extending the capacity, range and quality of the shopping opportunity that provides for the needs of all residents and creates a more competitive town that fulfils its role as a metropolitan centre.

**OBJECTIVE 4:** Providing residential capacity within the town centre, through mixed use development that ensures housing meets local needs including the supply of affordable housing.

**OBJECTIVE 5:** Enhancing the character and heritage of the town centre, especially in Bromley North Village, ensuring that new development adds to its distinctiveness.

**OBJECTIVE 6:** Promoting high quality design and townscape improvements throughout the town centre and enhancing the quality and character of the area.

**OBJECTIVE 7:** Promoting sustainable development by minimising the impacts of town centre development on the environment and ensuring Bromley is an attractive place to live, work, visit and invest.
OBJECTIVE 8: Improving accessibility and travel choice, encouraging greater use of public transport and other more sustainable forms of transport and making effective use of existing transport assets.

Policies

The policies set out in the AAP seek to deliver these objectives along with the Sustainability Appraisal objectives and key messages from the Equalities Impact Assessment Scoping Report. The policies are set out under topic heading. The linkages between the policies and the stated objectives are set out in Appendix 4 of the draft AAP.
10. FINAL EQUALITY IMPACT ASSESSMENT

10.1. Drawing on the conclusions of the initial equality impact assessment, a final equality impact assessment of the Proposed Submission draft AAP was carried out. The outcomes of this assessment are summarised in the matrix displayed in Appendix C.

10.2. No unlawful discrimination was identified, and areas identified in the initial EqIA of the preferred options as needing further exploration to ensure potentially adverse impacts on key equality groups are mitigated against have been addressed through policy interventions.

10.3. Furthermore, a number of the policy interventions help to ensure steps will be taken to maximise potentially positive benefits on equality groups.

10.4. The way in which each of these issues has been addressed through the policy interventions is summarised under the following headings below and will form the basis of targeted consultation with key equality groups and their representatives throughout the six week formal consultation period.

Social Infrastructure

10.5. **Policy BTC30 – Phasing** – states that infrastructure provision, including transport, community facilities and play and open space provision will be phased in relation to new development to ensure that adequate capacity is available. Development will not be permitted unless the necessary physical and social infrastructure has been secured. Furthermore, Policy BTC31 Developer Contributions - requires residential and commercial developments in the town centre to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council taking into account
Policy BTC1: Mixed Use Development – includes provisions for around 4000 sq m (gross) additional leisure floorspace and around 3500 sq m (gross) additional community facilities.

Policy BTC6- Replacement Leisure Centre – ensures that the redevelopment of the Pavilion Leisure Centre (Opportunity Site E) for retail uses is dependent on the appropriate re-provision of leisure facilities elsewhere within the town centre. The Council will work with the private sector to ensure the relocation of leisure facilities is secured prior to the commencement of development of the existing leisure centre. The Civic Centre site (Opportunity Site F) has been identified as a suitable site for the re-provision of leisure facilities within the town centre.

Policy BTC20 Play and Informal Recreation – requires developers to provide play and informal recreation facilities based on an assessment of needs generated by proposed development. New retail and leisure developments and public spaces will also be required to make provision for play and informal recreation. Provision will include the provision of play art and the enhancement of facilities in existing open spaces.

Religious Facilities

Policy OSG: West of the High Street – requires the Council to work with land owners and developers to promote the comprehensive mixed use development of land to the west of the High Street with development including up to 2,000 sq m additional community and health facilities and reprovision of facilities for faith uses.

Similarly, Policy OSL: DHSS building and adjoining Bromley Christian Centre – requires the Council to work with landowners and developers to promote a mixed use comprehensive hotel-led development including Faith uses.

Disabled Access

Policy BTC21 Transport Schemes stipulates that the Council will seek to ensure that transport scheme proposals support the new development proposed in each phase of development and
improve conditions for pedestrians, cyclists, disabled people, public transport, freight and business.

Policy BTC22 Public Transport similarly requires the Council to promote the use of public transport that serves the town centre, expecting step-change improvements at both Bromley South and Bromley North stations to reflect their increasingly important roles as public transport gateways, including better interchange and disabled access.

Policy BTC23 Land Safeguarded for Transport Schemes – safeguards land for improvements at Bromley South station to provide a better public transport gateway, interchange, bus priority and disabled access [required before Phase Two of the AAP].

Lifetime Homes

Policy BTC3- Housing Mix – requires all new housing to meet Lifetime Homes (or subsequent) standards and at least 10% of units within each scheme to have the following features:

- level access;
- all internal door widths sufficient for wheelchair access;
- bathroom/WC designed and finished on the basis of a “wet room” and such that can be easily converted to a room with a shower and no bath;
- living room & dining room and kitchen and at least 67% of bedrooms should have sufficient space to manoeuvre a wheelchair;
- all kitchen fittings/appliances/worktops/plumbing etc should be designed and constructed so that they can be easily adjusted in height;
- entrance doorways, if external, should be level and covered;
- each unit to have a designated parking space with sufficient room for a wheelchair user to access their vehicle;
• walls and ceilings to be of sufficient construction to be able to install and take the strain of handrails and ceiling hoists.

Affordable Homes

Policy BTC3- Housing Mix states a requirement by the Council for a mix of housing including private and affordable housing. The level of affordable housing required in any development scheme will be in accordance with adopted local and strategic policy and take into account other objectives of the AAP.

Policy BTC31 Developer Contributions also requires residential and commercial developments in the town centre to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council taking into account other policies in the AAP.

Mixed Typology

Policy BTC3- Housing Mix establishes a Council requirement for new developments to provide a range of housing choices in terms of the mix of housing sizes and types.

Design out Crime Issues

Policy BTC17 Design Quality stipulates that the Council will require the highest standard of design in all new development. Development proposals will be required to enhance the appearance and environment of the town centre and include an appropriate enhancement of the historic environment. The Council will address security issues and provide for safe and secure environments through the application of Secure by Design principles. The Council will require all development to incorporate principles of Inclusive Design as set out in the London Plan.

Retail Offer

Policy BTC4- New retail facilities - commits the Council to work with the private sector to provide around 42,000 sq m (gross) additional retail floorspace through the promotion of new
retail development on Opportunity Sites E and G and to improve the existing retail stock through the extension of the Primary Shopping Frontage. Retail development will be required to provide for prime retail floorspace and a range of unit sizes including smaller units suitable for independent traders and to complement and be fully integrated and well connected with existing retail facilities. The improvement and extension of existing shops will be permitted provided they achieve a high standard of design and are well integrated with the rest of the town centre.

10.20. New retail provision is included in:
- OSP: Sainsburys, West Street
- Bromley North
- The Pavilion
- West of High Street
- Bromley South Stations and Environs

10.21. Furthermore, through Policy IA1 Bromley North Village Improvement Area, the Council will seek to protect and enhance the character of Bromley North Village through the designation of the Bromley North Village Improvement Area. Particular emphasis will be placed on the promotion of independent retailers including specialist food shops to add to the variety of the retail offer in the town centre.

10.22. Policy IA2 Business Improvement Areas will provide a range of business floorspace and new retail, leisure and hotel/conference facilities together with improvements to the public realm and transport facilities in order to ensure that existing major employers choose to remain and invest in the town centre.

10.23. Furthermore, Policy OSJ: Bromley South Stations and environs – requires the re-development or refurbishment of existing retail units opposite the station.
11. FURTHER CONSIDERATIONS

11.1. No adverse impacts are anticipated as a direct result of the AAP. For the purposes of ensuring the maximum positive impact is achieved, however, there are a number of further considerations that need to be taken into account. These are summarised below:

- **Ensuring an appropriate housing mix.** Although Policy BTC3 requires an appropriate housing mix, the exact requirements of this mix are not stated. It is essential that the mix of housing being brought forward through individual developments is monitored closely by the Council in relation to the overall housing strategy for the Borough to ensure a mix of housing of different sizes and tenures to meet a range of needs.

- **Ensuring the appropriate provision of community facilities.** A number of policies provide for new or improved community facilities such as play and open space and public art. To ensure these facilities meet the needs of the local community, it is essential that proposals are developed in consultation with the local community and developed as part of an overall strategy for the town centre.

- **Consultation with service providers.** A number of policies in the AAP will also serve to ensure the provision of new social infrastructure (including health, leisure, community and faith provision) within the appropriate timescale to meet the needs of new and existing residents. It is essential that the key service providers consulted with at the earliest stage to ensure the appropriate quantity, phasing and format of provision and that provision is monitored throughout the plan period.

- **Meeting educational requirements.** Development brought forward within the AAP area will result in an increase the town centre population and associated child yield. The demand for education provision will be dependent on the mix of housing and phasing of development. Preliminary indicative modelling suggests that local schools will have capacity to accommodate this
additional demand in the early phases, but additional school places may be required in later stages of development. This may be achieved through extension of existing schools. Education provision must be monitored in relation to the phasing of development to ensure the increase in education demand can be accommodated and to identify trigger points for the provision of new school places at an early stage.

- **Providing community space.** Community space is provided as part of the development of several Opportunity Sites. If this space is to fulfil the wider role of providing meeting space for different community and faith groups, it will need to be provided in a flexible format that can respond to the varied demands of different user groups over time.
12. CONCLUSION

12.1. The final Equality Impact Assessment has not identified any potentially adverse impacts on the six equality strands as a direct result of the draft AAP.

12.2. This EqIA has assessed the formal stage of the AAP known as The Proposed Submission - Regulation 27 of the Town and Country Planning (Local Development) (England) Regulations 2004 amended 2008. This stage is prior to the formal submission stage and the document has to be made available for public inspection for 6 weeks. Any comments received have to relate to 'legal compliance' and the 'soundness' of the plan.

12.3. The Council considers the AAP to be “sound” and proposes that it is submitted to the Secretary of State later this year for independent examination. It is likely that examination will take place in early 2010.

12.4. Upon submission of the final AAP to the Secretary of State, it is recommended that this EqIA remain a live document that is used to inform the strategic approach to further equality impact assessments on the individual plans as they come forward.

12.5. Where this EqIA has been subject to strategic consultation to inform the development of AAP policy, as the policies of the AAP are implemented into development plans, further EqIAs will be necessary that incorporate further targeted consultation with key equality groups to ensure such considerations are made integral to the detailed plans.

12.6. Should any potentially adverse impacts be identified in these subsequent assessments, the Council will need to consider mitigation measure if these potential impacts:

- will unlawfully discriminate against any of the six equality strands;
- can be addressed without causing adverse impact on any other equality group; and/or
- challenge the legal compliance or soundness of the Plan.
12.7. Further, there are a number of additional considerations that will help to ensure that the potentially positive impacts on the equality groups are fully realised through the implementation of the AAP proposals.

12.8. A key issue relates to the requirement for monitoring the impact of an increase in population on the demand for social and community services and facilities (including health, education, leisure and community). The emerging Core Strategy for Bromley will investigate this issue further but will also need to be monitored for each development coming forward within the town centre.

12.9. It is recommended that the Council takes lead responsibility in ensuring these considerations are taken forward with its partners at each key stage of development within Bromley town centre.
APPENDICES

Appendix A: DRAFT EQIA MATRIX
<table>
<thead>
<tr>
<th>Objectives</th>
<th>Preferred Option</th>
<th>Potential Impact on Equality Group</th>
<th>Potential for Impact</th>
<th>Sustainability Criteria</th>
<th>Consultation Comments</th>
<th>Measures necessary to reduce adverse impact</th>
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<tbody>
<tr>
<td>1. Promoting economic growth and local employment opportunities - creating a prosperous economy and improving employment opportunities for benefit of Borough and London as a whole.</td>
<td>● Up to 50,000 sq m of additional retail space ● New offices as part of mixed use development ● 22,000 sq m retail extension to The Glades ● Comprehensive 20,000 sq m retail led mixed development ● Hotel led development ● Replacement retail floorspace ● 2,000 sq m business space ● 5,000 sq m new business ● Bromley North Village encouragement of niche/independent traders</td>
<td>Gender Race Disability Age Faith Sexuality</td>
<td>● Policy aim to provide employment and training opportunities to those residents with disabilities.</td>
<td>● To reduce unemployment and increase the range of opportunities for rewarding local employment ● To build a robust and diverse economy and sustain economic development ● To enable the borough and all areas to achieve their economic potential ● To increase the amount of both indigenous and inward investment ● To reduce unnecessary movement of labour and goods in support of improved economic performance ● To raise the profile of the borough as an attractive location for a range of businesses</td>
<td>N/A</td>
<td>N/A</td>
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</tbody>
</table>
### 2. Extending the range and quality of facilities and services - creating a vibrant, thriving town centre

- **4,000 sq m of new community space**
- **New / re-provision of leisure space**
- **Live entertainment, cinema and cultural venues**
- **Enhanced cultural quarter with improved library and Churchill Theatre**
- **Up to 2,000 sq m new health use space**
- **Possibility of new doctor's surgery**

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<tr>
<td>●</td>
<td><strong>Appropriate range and quantity of facilities to serve the local community</strong> (distinctive needs of elderly (higher than average % of over-64 in the borough) and young (higher than average 18-29 in town centre).</td>
<td><strong>To improve the health of the whole population and reduce health inequalities</strong></td>
<td><strong>To improve the education and skills of the population</strong></td>
<td><strong>To strengthen community identity, social responsibility and engagement</strong></td>
<td><strong>To improve access for all to essential local services and facilities</strong></td>
</tr>
<tr>
<td>●</td>
<td>Management of the evening economy to attract a wider range of visitors including families with children.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>Promotion of balanced mixed use development to include retail, leisure, business and residential uses;</strong></td>
</tr>
<tr>
<td>●</td>
<td>The provision of appropriate levels of health facilities;</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>A new entertainment/leisure focus at Bromley South (Southern Gateway);</strong></td>
</tr>
<tr>
<td>●</td>
<td>Higher % of Christians in LB Bromley; small representation of faith groups</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>An enhanced cultural quarter around the Churchill Theatre/library including education facilities and a new arts/community focus (Bromley Central);</strong></td>
</tr>
<tr>
<td>●</td>
<td>Welcomed faith groups being recognised by the revised preferred options.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>Rationalisation of the Civic Centre to include civic offices and other appropriate uses which respect the setting of the Palace (Civic Hub);</strong></td>
</tr>
<tr>
<td>●</td>
<td>Faith groups would benefit from expansion</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>New retail/community uses on the north west side of the High Street to create a new focus of</strong></td>
</tr>
<tr>
<td>●</td>
<td>Civic Centre reception is quite a long way for the elderly to walk to from the bus stops.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>Town is unsafe in the evenings and that facilities for teenagers may help to overcome this.</strong></td>
</tr>
<tr>
<td>●</td>
<td>Removing the Pavilion for a temporary period will impact on members of the community who use it often.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>Civic Centre reception is quite a long way for the elderly to walk to from the bus stops.</strong></td>
</tr>
<tr>
<td>●</td>
<td>Welcomed faith groups being recognised by the revised preferred options.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>Promotion of balanced mixed use development to include retail, leisure, business and residential uses;</strong></td>
</tr>
<tr>
<td>●</td>
<td>Faith groups would benefit from expansion</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>A new entertainment/leisure focus at Bromley South (Southern Gateway);</strong></td>
</tr>
<tr>
<td>●</td>
<td>Civic Centre reception is quite a long way for the elderly to walk to from the bus stops.</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>An enhanced cultural quarter around the Churchill Theatre/library including education facilities and a new arts/community focus (Bromley Central);</strong></td>
</tr>
<tr>
<td>●</td>
<td>Rationalisation of the Civic Centre to include civic offices and other appropriate uses which respect the setting of the Palace (Civic Hub);</td>
<td>To improve the education and skills of the population</td>
<td>To strengthen community identity, social responsibility and engagement</td>
<td>To improve access for all to essential local services and facilities</td>
<td><strong>New retail/community uses on the north west side of the High Street to create a new focus of</strong></td>
</tr>
</tbody>
</table>
other faith groups - need to ensure their specific needs are accommodated.
- Faith groups form a strong and cohesive element within the town’s social fabric and it is important that this continues to be the case.
- Two churches are within the boundaries of Site G.
- Provision of accommodation for Faith Groups.
- Significant new residential population will place extra demand on education, health, leisure and community facilities.
- Needs to be met by adequate supply.

of premises and increased access to parking spaces after shopping hours.
- Requested that the removal of Bromley Christian Centre from Site L be re-examined.

Development of Site G will be very high density and will have a big impact on local services such as Dr. surgeries and schools, as well as drainage systems, particularly in light of the fact that two houses collapsed in Ridley Road. Will increase demand for primary and community health services in the area. Current primary and community health services are at or close to full capacity, and would community activity and to enhance the appearance and amenities of North Village (The Hill).
| 3. Extending the capacity, range and quality of the shopping opportunity - providing for the needs of all residents and creating a more competitive town centre |
|---|---|
| ● 50,000 sq m of new retail space  
● Retail led mixed use development  
● The Pavilion site expands The Glades shopping centre  
Encourage niche / independent traders |
| • Higher proportion of Asian Indian and Asian Chinese living in town centre - cultural retail needs?  
• Retail offer to reflect age structure of both town centre and wider borough (i.e. working age and retired across borough, younger population in town centre).  
• Disability access incorporated into new retail developments. |
| • To build a robust and diverse economy and sustain economic development  
• To raise the profile of the borough as an attractive location for a range of businesses  
• To improve the social and environmental performance of businesses and local economy  
• To reduce unemployment and increase the range of opportunities for rewarding local employment  
• To reduce unnecessary movement of labour and goods in support of improved economic performance |
| ● Currently no changing facilities with a hoist for disabled people to use in Bromley Town Centre. |

therefore be unable to meet the needs of additional residents from their current premises.
4. Increasing the residential capacity within the town centre whilst accommodating future growth of town centre functions - ensuring housing meets local needs including ensuring supply of affordable housing

- 1,600 new residential units, 35% affordable
- Increased residential accommodation will help prevent crime by increasing activity in town centre area
- The need for 3,100 social housing units (borough-wide) to 2016 - currently only a small percentage of LB Bromley's stock is currently in the town centre.
- The importance of housing in providing a balanced mix of uses in the town centre.
- The capacity of the town centre to accommodate new development whilst protecting residential amenity and the character of the town centre.

- To increase the amount of both indigenous and inward investment
- To strengthen community identity, social responsibility and engagement
- To provide everybody with the opportunity to live in a decent home
- To reduce crime and anti-social activity
- To improve the health of the whole population and reduce health inequalities
- Need for housing in the town centre (family homes of 3 or more bedrooms, with local play areas and garden space).
- No reference to affordable housing on Site B, and that the site would be suitable for it.
- Site P would be suitable for affordable housing. Suggestion that affordable housing be spread between Sites B, P and A.
- Objection to the requirement stated in paragraph 3.32 for a 70:30 split of social rented housing and intermediate housing within.

- Promotion of balanced mixed use development to include retail, leisure, business and residential uses.
- Accommodation of the station interchanges and extended retail core (Northern Gateway, Retail Core, Southern Gateway).
5. Protection and enhancement of the historic environment – protecting the character and distinctiveness of the town centre

- New residential must be designed to minimise impact on Bromley and Shepperd’s College
- Maintain listed buildings at Bromley North Station and former Town Hall & South Street Car Park sites
- Not felt to be an equalities issue.
- To maintain and enhance the quality of landscapes and townscapes
- To conserve and enhance valued historic environments
- N/A

6. Promoting high quality design and townscape improvements - enhancing the

- Most of the sites must consider scale and form of surrounding buildings
- Allow for taller
- Bromley policy priority to reduce youth crime and anti-social behaviour.
- The quality
- To reduce crime and anti-social activity
- To maintain and enhance the quality of
- All new residential, re-furbished residential, licensed premises,
- Creation of new active frontages on the parks and gardens to integrate the open spaces with the rest of the town
<table>
<thead>
<tr>
<th>Quality and Character of the Town Centre</th>
<th>Buildings in acceptable areas</th>
<th>Improved frontages of buildings on High Street</th>
<th>Improved Pedestrian environments including those with impaired mobility throughout the town centre;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Quality and design of new development</td>
<td>The capacity of the town centre to accommodate new development whilst protecting residential amenity and the character of the town centre</td>
<td>ATM's, takeaways, play area be designed and proposed to meet the requirements of the Secure by Design scheme.</td>
</tr>
<tr>
<td></td>
<td>The quality and character of the public realm and existing facilities is an essential consideration of the development.</td>
<td>Should a larger development be proposed that would include associated car parking facilities then this should be designed and built to meet a Safer Parking Accreditation.</td>
<td>Anti-terrorism measures to be incorporated especially around the area of bollard installation, CCTV needs etc.</td>
</tr>
<tr>
<td></td>
<td>Improvements to the existing business areas to accommodate the needs of existing employers and attract new investment and high quality business development and employment opportunities.</td>
<td>Improvements will include environmental and townscape improvements, improved access to business premises and linkages to town centre functions and promotion of high quality design in new business</td>
<td></td>
</tr>
</tbody>
</table>
7. Promoting sustainable development and minimising impacts on the environment ensuring Bromley is an attractive place to live, work, visit and invest

- Create sensitive frontages to parks and streets integrating open spaces into town centre area
- Improve Queens Garden site with seating areas and pedestrian linkages
- The quality and appearance of the public realm and existing facilities
- Public transport and interchange facilities
- The need for a more diverse range of activities within the town centre
- The importance of housing in providing a balanced mix of uses in the town centre
- Management of the evening economy to attract a wider range of visitors including families with children
- Provision of appropriate health facilities
- Safety and security;
- The quality and design of new development
- The capacity of the town centre to
- To improve access for all to essential local services and facilities
- To reduce crime and antisocial activity
- To maintain and enhance biodiversity including habitats, flora and fauna
- To maintain and enhance the quality of landscapes and townscapes
- To reduce the effect of traffic and travel on the environment
- To improve air quality and reduce noise and light pollution
- To maintain and enhance biodiversity including habitats, flora and fauna
- To maintain and enhance the quality of landscapes and townscapes
- To conserve and enhance
- Children's play areas would be beneficial in attracting families to the town centre and would provide children with a safe place to play, and that there is currently no space for disabled people and children to run play and activity sessions, and that this should be taken into account for site D.
- Concern that Bromley's public spaces will be threatened by the AAP, in particular the Civic Centre grounds and Bishop's Palace.
- Promotion of balanced mixed use development to include retail, leisure, business and residential uses
- High density/mixed use transport hubs to include residential development in close proximity to public transport facilities (Northern and Southern Gateways);
- A new entertainment/leisure focus at Bromley South (Southern Gateway)
- An enhanced cultural quarter around the Churchill Theatre/library including education facilities and a new arts/community focus (Bromley Central)
accommodate new development whilst protecting and enhancing character and amenity of the town centre.

- To reduce contributions to climate change (and make appropriate adaptations).
- To improve the quality of the water environment, retain good drinking water quality in the long term and reduce flood risk.
- To increase the efficient use of natural resources and make the most appropriate use of land.
- To reduce the environmental impact of waste in accordance with the waste hierarchy.
- To build a robust and diverse economy and sustain economic development.
- To enable the borough and all areas to achieve their economic potential.
- To increase the economic potential of the borough and all areas.
- To enable the borough and all areas to achieve their economic potential.
8. Improving transport and accessibility and encouraging use of more sustainable means of transport – ensuring use of public transport is promoted and provision is accessible, safe and reliable

- Improved and redeveloped rail stations and transport interchanges
- Improved access to a number of sites
- Provision and improvement of car parks
- Improve and provide pedestrian and cycling linkages across the town centre area
- Public transport and interchange facilities
- The management and future provision of public parking.
- Need for improvements to Bromley South station to enable disability access.
- Need for safer walking and cycling routes to schools.
- High levels of car ownership at present, need quality public transport offer if to persuade people to use
- To improve access for all to essential local services and facilities
- To reduce the effect of traffic and travel on the environment
- To improve air quality and reduce noise and light pollution
- To reduce contributions to climate change (and make appropriate adaptations)
- To reduce unnecessary movement of labour and goods in support
- Bromley South station has no provision for wheelchair users, and that assurances need to be given to wheelchair users that when redeveloped the station will be fully accessible to the disabled.
- Improved permeability for cyclists and walkers is important.
- Kentish Way is often congested, and that bus priority
- High density/mixed use transport hubs to include residential development in close proximity to public transport facilities (Northern and Southern Gateways)
- Improved pedestrian environments including those with impaired mobility throughout then town centre;
alternative modes. of improved economic performance

● London TravelWatch would like to see a second accessible entrance to Bromley South Station from Kentish Way.
● There are currently no car parks in Bromley Town Centre which can accommodate a minibus for adults with learning disabilities.
● 5-10 years is too long to wait for Bromley South to gain wheelchair/pram access.
● Criticism of AAP for not making any provision for cyclists to reach the centre of town.
● Suggested cycle routes for pupils to get to local schools.
● Traffic in Tweedy Road may increase, and that the bus stop...
outside Boots needs to stay as it provides easy access for the elderly.

<table>
<thead>
<tr>
<th>Potentially Adverse Impact</th>
<th>Neutral Impact</th>
<th>Positive Impact</th>
</tr>
</thead>
</table>

BROMLEY TOWN CENTRE AREA ACTION PLAN – EQUALITY IMPACT ASSESSMENT
## APPENDICES

### Appendix B: EQIA SCOPING REPORT CONSULTEES

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ms. Fallon</td>
<td>Age Concern Bromley</td>
</tr>
<tr>
<td>Mr. Payne</td>
<td>Babbacombe Road Residents Association</td>
</tr>
<tr>
<td>Mr. Browne</td>
<td>BATH- Bromley Association with People with Disability</td>
</tr>
<tr>
<td>Mr. Lawson</td>
<td>BBRAG</td>
</tr>
<tr>
<td>Mr. Wheeler</td>
<td>Bromley Adult Education College</td>
</tr>
<tr>
<td>Ms. Burrows</td>
<td>Bromley Advocacy Project - Service User Involvement Team (SUITe)</td>
</tr>
<tr>
<td>Mr. Riat</td>
<td>Bromley Asian Cultural Association</td>
</tr>
<tr>
<td>Mr. Lane</td>
<td>Bromley Aistic Trust</td>
</tr>
<tr>
<td>Mr. Wiltshire</td>
<td>Bromley Christian Centre</td>
</tr>
<tr>
<td>Mr. Collington</td>
<td>Bromley Council on Ageing</td>
</tr>
<tr>
<td>Ms. Stone</td>
<td>Bromley Learning Disabilities Forum c/o Bromley Mencap</td>
</tr>
<tr>
<td>Mr. Lynch</td>
<td>Bromley Mencap</td>
</tr>
<tr>
<td>Ms. Langridge</td>
<td>Bromley Mental Health Forum</td>
</tr>
<tr>
<td>Ms. Lowing</td>
<td>Bromley Mind</td>
</tr>
<tr>
<td>Mr. Mahmood</td>
<td>Bromley Muslim Association</td>
</tr>
<tr>
<td>Mr. Turpin</td>
<td>Bromley Mytime</td>
</tr>
<tr>
<td>Mr. Swann</td>
<td>Bromley MyTime - Pavilion Leisure Centre</td>
</tr>
<tr>
<td>Mr. &amp; Mrs.</td>
<td>Bromley North Residents’ Association</td>
</tr>
<tr>
<td>Mr. Robbins</td>
<td>Bromley PCT</td>
</tr>
<tr>
<td>Ms. Weston</td>
<td>Bromley Police</td>
</tr>
<tr>
<td>Mrs. Ali</td>
<td>Bromley Somali Community Association</td>
</tr>
<tr>
<td>Mr. Morgan</td>
<td>Bromley Town Chaplaincy</td>
</tr>
<tr>
<td>Mr. Whitnall</td>
<td>Bromley Town Church</td>
</tr>
<tr>
<td>Ms. Yardley</td>
<td>Bromley United Reformed Church</td>
</tr>
<tr>
<td>Ms. Choppin</td>
<td>Bromley Wheelchair User Group</td>
</tr>
<tr>
<td>Sir/Madam</td>
<td>Bromley Youth Council</td>
</tr>
<tr>
<td>Sir/Madam</td>
<td>Children &amp; Families Forum (hosted by ‘Bromley Y’)</td>
</tr>
<tr>
<td>Ms. Clarke</td>
<td>Churches Together in Bromley</td>
</tr>
<tr>
<td>Ms. Craney</td>
<td>Deaf Access Bromley</td>
</tr>
<tr>
<td>Mr. Groves</td>
<td>Disability Voice Bromley</td>
</tr>
<tr>
<td>Mrs. Brown</td>
<td>English Heritage - London Region</td>
</tr>
<tr>
<td>Ms. Pearce</td>
<td>Ethnic Communities Programme / Network</td>
</tr>
<tr>
<td>Mr.</td>
<td>Watson</td>
</tr>
<tr>
<td>-----------</td>
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<tr>
<td>Mr.</td>
<td>Banfield</td>
</tr>
<tr>
<td>Ms.</td>
<td>Walker</td>
</tr>
<tr>
<td>Mr.</td>
<td>Newman</td>
</tr>
<tr>
<td>Mr.</td>
<td>de Bruyn</td>
</tr>
<tr>
<td>Mr.</td>
<td>Harvey</td>
</tr>
<tr>
<td>Mr.</td>
<td>Stops</td>
</tr>
<tr>
<td>Mr.</td>
<td>Lane</td>
</tr>
<tr>
<td>Ms.</td>
<td>Stephens</td>
</tr>
<tr>
<td>Ms.</td>
<td>Bell</td>
</tr>
<tr>
<td>Mr.</td>
<td>Azeez</td>
</tr>
<tr>
<td>Mr.</td>
<td>Watson</td>
</tr>
<tr>
<td>Major</td>
<td>Cox</td>
</tr>
<tr>
<td>Mr.</td>
<td>Sharland</td>
</tr>
<tr>
<td>Mr.</td>
<td>Balcombe</td>
</tr>
<tr>
<td>Ms.</td>
<td>Gentry</td>
</tr>
</tbody>
</table>
APPENDICES

Appendix C: EQIA OF PROPOSED SUBMISSION DRAFT AAP
## PROPOSED SUBMISSION DRAFT

### AAP

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Policy</th>
<th>Potential Impact on Equality Group</th>
<th>Relevant Sustainability Objectives</th>
<th>Consultation Comments</th>
<th>Further Considerations</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Extending the range, quality and accessibility of facilities and services to support a vibrant, thriving place that attracts people to live, work and play in the town centre.</td>
<td>BTC1 - Mixed Use Development</td>
<td>Improving the retail offer for local people. Increasing social infrastructure provision. Ensuring disabled access. Design out Crime. Ensuring lifetime homes provision.</td>
<td>SA1: Health &amp; health inequalities SA4: Reduce crime SA5: Community identity &amp; social responsibility SA6: Unemployment and local employment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>BTC2 - Housing Density</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>BTC3 - Housing Mix</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>BTC4 - New Retail Facilities</td>
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<td></td>
<td></td>
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<tr>
<td>BTC5 - Office Development</td>
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</tr>
</tbody>
</table>

- Comment on lack of linked services and sports provision at affordable rates for young people
- Bromley Children Project, Children and Young people’s Department

Developments to undertake detailed modelling of population increase and associated impact on demand for social infrastructure as agreed by the...
<table>
<thead>
<tr>
<th>BTC6</th>
<th>Replacement Leisure Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td>BTC18</td>
<td>Public Realm</td>
</tr>
<tr>
<td>BTC20</td>
<td>Play and Informal Recreation</td>
</tr>
<tr>
<td>BTC21</td>
<td>Transport Schemes</td>
</tr>
<tr>
<td>BTC25</td>
<td>Parking</td>
</tr>
<tr>
<td>BTC26</td>
<td>Phasing of Transport Improvements</td>
</tr>
</tbody>
</table>

**Bromley North** to include 1,000 sq.m of community space (including a health facility). Bromley Civic Centre to include 5,000 sq.m for a new leisure facility (to replace the Pavilion). Westmoreland Car Park to include 4,000 sq.m for a cinema and associated leisure uses. DHSS building to include 500sqm for faith uses. West of High St. 2,000 sq.m of additional community and health facilities and reprovision of facilities for faith uses. Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA7:** Access to local services  
- There is a need for areas and leisure facilities for young people to meet and use and should be incorporated
- Local schools and doctors already over-subscribed and development - need for new social infrastructure
- Bromley Scope suggest a hydrotherapy pool could be added to the leisure centre

**SA8:** Traffic and travel  
- Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA9:** Air, noise and light pollution  
- There is a need for areas and leisure facilities for young people to meet and use and should be incorporated
- Local schools and doctors already over-subscribed and development - need for new social infrastructure
- Bromley Scope suggest a hydrotherapy pool could be added to the leisure centre

**SA17:** Sustain economic development  
- Bromley Civic Centre to include 5,000 sq.m for a new leisure facility (to replace the Pavilion). Westmoreland Car Park to include 4,000 sq.m for a cinema and associated leisure uses. DHSS building to include 500sqm for faith uses. West of High St. 2,000 sq.m of additional community and health facilities and reprovision of facilities for faith uses. Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA18:** Achieve economic potential  
- Bromley Civic Centre to include 5,000 sq.m for a new leisure facility (to replace the Pavilion). Westmoreland Car Park to include 4,000 sq.m for a cinema and associated leisure uses. DHSS building to include 500sqm for faith uses. West of High St. 2,000 sq.m of additional community and health facilities and reprovision of facilities for faith uses. Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA19:** Increase investment  
- Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA20:** Unnecessary movement of labour and goods  
- Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA21:** Profile of the borough for businesses  
- Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

**SA22:** Social and environmental performance of economy  
- Enhanced setting of Churchill Theatre and Library building and enhanced entrance to Church House and Library Gardens. Encouraged use of vacant floorspace in

Council. Service providers to be consulted about the level and type of provision. Service-users to be included in design of new open spaces and play space. Council to consult with specialist agencies to ensure disability considerations incorporated into detailed design of developments. Council to work with service providers to explore potential of provision of further interventions suggested.
<table>
<thead>
<tr>
<th>OSN: Central Library and Churchill Theatre</th>
<th>IA1 Bromley North Village Improvement Area IA2 Business Improvement District</th>
<th>Library and Theatre for cultural and community facilities. All residential and commercial development within the AAP area will be required to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>older people, not just younger people</td>
<td>• Need for appropriate toilet/changing facilities in facilities identified by Mencap</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Mytime suggest their concessionary prices ensure affordability for lower income groups</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Bromley Muslim Association would like the plan to incorporate; 1. a purpose built facility accommodating a restaurant, shops, prayer halls and offices, and 2. a large hall with moveable partitions and adjacent wash room facilities.</td>
</tr>
<tr>
<td>BTC1 - Mixed Use Development</td>
<td>BTC4 - New Retail Facilities</td>
<td>BTC21 - Transport Schemes</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------</td>
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</tbody>
</table>

OSA: Bromley North Station
OSE: The Pavilion
OSG: West of the High Street
OSK: Westmoreland Road Car Park
IA1 Bromley North Village Improvement Area

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| Improving the retail offer for local people. Increasing social infrastructure provision. Ensuring disabled access. | SA5: Community identity & social responsibility |
| SUPPORT FOR STRENGTHENING RETAIL OFFER AND DELIVERING UNITS ATTRACTIVE TO HIGH CLASS RETAILERS IN ORDER TO COMPETE WITH NEARBY CENTRES SUCH AS CROYDON AND BLUEWATER. NEED FOR GOOD QUALITY STORES IN BTC | SA6: Unemployment and local employment |
| SA7: Access to local services | SA17: Sustain economic development |
| SA18: Achieve economic potential | SA19: Increase investment |
| SA21: Profile of the borough for businesses | SA22: Social and environmental performance of economy |

| Ensure the availability of the appropriate type, scale and affordability of retail units to ensure the appropriate retail offer. |
4. Providing residential capacity within the town centre, through mixed use development that ensures housing meets local needs including the supply of affordable housing.

| BTC1 - Mixed Use Development | Ensuring lifetime homes provision. Ensuring disabled access. A suitable mix of affordable homes. A balanced and mixed typology. New developments required to demonstrate that associated requirements for education, health, open space and play and other facilities can be met. All residential and commercial development within the AAP area will be required to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council. |
| BTC2 - Housing Density | SA1: Health & health inequalities |
| BTC3 - Housing Mix | SA3: Decent homes |
| BTC18 - Inclusive Design | SA4: Reduce crime |
| BTC20 - Play and Informal Recreation | SA5: Community identity & social responsibility |
| BTC21 - Transport Schemes | SA7: Access to local services |
| BTC26 - Phasing of Transport Improvements | SA8: Traffic and travel |
| OSA: Bromley North Station | SA20: Unnecessary movement of labour and goods |
| OSB: Corner of Tweedy Road/London Road | ● LBB Housing and Residential Services supports mix of housing in BTC which would promote affordable housing for disabled people, learning disabilities, older people and people with sensory impairments. |
| OSF Bromley Civic Centre | ● LBB Housing and Residential Services also stress that Policy BTC3 on wheelchair access should be strongly enforced. Support for principles of inclusive design and adequate play space. |
| OSG: West of the High Street | ● Support for providing larger socially rented units for families, and smaller units should be limited |
| OSK: Westmoreland Road Car Park | ● Support for diversified tenure housing in the town centre |
| OSL: DHSS building and adjoining Bromley Christian Centre | ● Recommended 50% affordable housing level be incorporated |
| IA1 Bromley North Village Improvement Area | ● Moat Housing support approach to Lifetime Homes and requirement |

Ongoing monitoring of housing supply versus demand.
of inclusive design. Suggest proposals give opportunity to provide housing of all tenures and housing suited to the needs of disabled people.
- Bromley Mencap highlight need for accessible accommodation and the importance of proximity to shops, facilities and transport links.
- Babbacombe Road Residents Association suggest older people are most likely to be car-free households and their needs must be considered.
5. Enhancing the character and heritage of the town centre, especially in Bromley North Village, ensuring that new development adds to its distinctiveness.

<table>
<thead>
<tr>
<th>BTC16 - Design Quality</th>
<th>BTC17 - Public Realm</th>
<th>BTC19 - Building Height</th>
</tr>
</thead>
<tbody>
<tr>
<td>OSB: Corner of Tweedy Road/ London Road</td>
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<tr>
<td>OSF Bromley Civic Centre</td>
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<tr>
<td>OSM: Queens Gardens</td>
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<tr>
<td>OSN: Central Library and Churchill Theatre</td>
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<tr>
<td>IA1 Bromley North Village Improvement Area</td>
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</tbody>
</table>

Design Out Crime. All residential and commercial development within the AAP area will be required to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council.

6. Promoting high quality design and townscape improvements throughout the town centre and enhancing the quality and character of the area.

<table>
<thead>
<tr>
<th>BTC8 - Sustainable Design and Construction</th>
<th>BTC14 - Biodiversity</th>
<th>BTC15 - Noise</th>
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</table>


- All new signage in BTC needs a strong identity, tactile surfaces and incorporate audio technology.

SA5: Community identity & social responsibility
SA11: Quality of landscapes and townscape
SA12: Historic environments

Community to be consulted about each development. Council to consult with specialist agencies to ensure disability considerations incorporated into detailed design of developments.
### 7. Promoting sustainable development by minimising the impacts of town centre development on the environment and ensuring Bromley is an attractive place to live, work, visit and invest.

<table>
<thead>
<tr>
<th>Area</th>
<th>Objectives</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>IA1 Bromley North Village Improvement Area</td>
<td></td>
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</tr>
<tr>
<td>BTC9 - Flood Risk</td>
<td>Providing a suitable mix of affordable homes. Developers required to provide play and informal recreation facilities based on assessment of needs generated by property development. Phased provision of infrastructure in relation to new development to ensure adequate capacity. Protected parks and open spaces. Create new public space.</td>
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<tr>
<td>BTC10 - River Ravensbourne</td>
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<tr>
<td>BTC11 - Drainage</td>
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<td>BTC12 - Combined Heat and Power</td>
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<tr>
<td>BTC13 - Recycling</td>
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<tr>
<td>BTC20 - Play and Informal Recreation</td>
<td></td>
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<tr>
<td>BTC24 - Walking and Cycling</td>
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<tr>
<td>BTC27 - Traffic Management</td>
<td></td>
<td></td>
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<tr>
<td>BTC28 - Car Clubs</td>
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</tbody>
</table>

- It is important to retain green spaces, some concern that they may be threatened by new developments. Natural England suggest need for more proactive support for protection and enhancement of environment and green spaces. Green spaces serve an important recreational and leisure function.

- All new build should be eco-friendly

Consultation with service providers and service users.
<table>
<thead>
<tr>
<th>Economic Potential</th>
<th>Improved integration of parks and open spaces within the town centre through the creation of high quality pedestrian green links. All residential and commercial development within the AAP area will be required to make an appropriate contribution to affordable housing, environmental improvements, transport, education, health and social/community facilities to be agreed with the Council.</th>
</tr>
</thead>
</table>
8. Improving accessibility and travel choice, encouraging greater use of public transport and other more sustainable forms of transport and making effective use of existing transport assets.

<table>
<thead>
<tr>
<th>BTC20</th>
<th>BTC22</th>
<th>BTC23</th>
<th>BTC24</th>
<th>BTC25</th>
<th>BTC26</th>
<th>BTC27</th>
<th>BTC28</th>
<th>OSA: Bromley North Station</th>
<th>OSJ: Bromley South Stations and environs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Play and Informal Recreation</td>
<td>Public Transport</td>
<td>Transport Schemes Safeguarding land</td>
<td>Walking and Cycling</td>
<td>Parking</td>
<td>Phasing of Transport Improvements</td>
<td>Traffic Management</td>
<td>Car Clubs</td>
<td>Essentials to local services</td>
<td>Traffic and travel</td>
</tr>
</tbody>
</table>


- Developments not to result in net increase of traffic.
- Improved conditions for pedestrians, cyclists, disabled people, public transport.
- Step changes to Bromley South and North train stations including better interchange and disabled access.
- Improvements to pedestrian access to cycle parking near stations and bus stops.
- Improvements to bus waiting areas and bus service information.
- Improved facilities for pedestrians and cyclists including safe and attractive road crossings.

- Sai: Access to local services
- Traffic and travel
- Air, noise and light pollution
- Climate change
- Unnecessary movement of labour and goods
- Social and environmental performance of economy

- Hyde HA suggests required disabled parking spaces might be difficult to accommodate.
- In terms of access, Bromley South Station should be made DDA-compliant (council have applied for Network Rail Access for All funding).
- Physical Disabilities and Sensory Impairment Partnership Groups stress that lift access to the station is vital. Suggest mobility issues in general need more explicit consideration given older population of Bromley.
- Kent Association for the Blind state that all development in BTC should be DDA compliant and oppose shared spaces citing that this contradicts the DDA. Bromley Mencap echo this point with consultation with service users - particularly with foreign language groups, to ensure adequate and appropriate signage.
All development within AAP area to allow appropriate provision for Car Clubs.

Kent Association for the Blind would also like to see rotating cones, tactile paving and no railings at road junctions.

- Disability Voice Bromley suggest a Mobility Forum is set up
- Bromley green Party suggest increasing pedestrianised areas

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<thead>
<tr>
<th>Potentially Adverse Impact</th>
<th>Neutral Impact</th>
<th>Positive Impact</th>
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pedestrian environment is accessible to people with disabilities.