



# **Bromley Local Plan Review**

Issues and Options (Regulation 18) draft – April  
2023

Bromley Council

Bromley Local Plan Review – Issues and Options (Regulation 18) draft – April 2023

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<b>1.</b>	<b>Introduction .....</b>	<b>1</b>
	Background.....	1
	New Local Plan process .....	2
	Issues and Options consultation .....	5
<b>2.</b>	<b>Vision, Objectives and Spatial Strategy.....</b>	<b>6</b>
	What is our current approach? .....	6
	What has changed?.....	7
	How should the new Local Plan respond to these changes?.....	9
<b>3.</b>	<b>Housing.....</b>	<b>12</b>
	What is our current approach? .....	12
	What has changed?.....	12
	How should the new Local Plan respond to these changes?.....	15
<b>4.</b>	<b>Employment, Retail and Leisure.....</b>	<b>17</b>
	What is our current approach? .....	17
	What has changed?.....	18
	How should the new Local Plan respond to these changes?.....	21
<b>5.</b>	<b>Design and Conservation.....</b>	<b>24</b>
	What is our current approach? .....	24
	What has changed?.....	25
	How should the new Local Plan respond to these changes?.....	26
<b>6.</b>	<b>Sustainability and Waste.....</b>	<b>28</b>
	What is our current approach? .....	28
	What has changed?.....	29
	How should the new Local Plan respond to these changes?.....	32
<b>7.</b>	<b>Green Infrastructure, Open Space and Biodiversity .</b>	<b>34</b>
	What is our current approach? .....	34

What has changed?.....	36
How should the new Local Plan respond to these changes?.....	37
<b>8. Social and strategic infrastructure.....</b>	<b>39</b>
What is our current approach? .....	39
What has changed?.....	40
How should the new Local Plan respond to these changes?.....	42
<b>9. Transport and public realm.....</b>	<b>44</b>
What is our current approach? .....	44
What has changed?.....	44
How should the new Local Plan respond to these changes?.....	47
<b>10. Site allocations.....</b>	<b>49</b>
What is our current approach? .....	49
What has changed?.....	49
How should the new Local Plan respond to these changes?.....	49

# 1. Introduction

## Background

- 1.1 The Bromley Local Plan was adopted in January 2019. This document sets out planning policies, site allocations and land designations for Bromley, and is the central document in the Borough's Development Plan.
- 1.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) require local planning authorities (LPAs) to review local plans at least once every five years from their adoption date to assess whether they need updating, to ensure that policies remain relevant and effectively address the needs of the local community.
- 1.3 The National Planning Policy Framework (NPPF)<sup>1</sup> states that reviews should take into account changing circumstances affecting the area, or any relevant changes in national policy. National Planning Practice Guidance (PPG)<sup>2</sup> sets out further information that LPAs can consider as part of reviewing whether the plan needs to be updated, including conformity with national planning policy; whether issues have arisen that may impact on the deliverability of key site allocations; the impact of changes to higher tier plans; and whether any new social, environmental or economic priorities may have arisen.
- 1.4 A number of these issues are applicable to Bromley, notably:
  - The publication of an updated National Planning Policy Framework in July 2021<sup>3</sup>;
  - The adoption of the London Plan in March 2021<sup>4</sup>; and
  - Updated social, environmental and economic Council priorities<sup>5</sup>.
- 1.5 The Council is therefore progressing with a full update of the Bromley Local Plan. This document is an important initial stage in the process, setting out the key issues for the new Local Plan, and seeking views from a wide range of stakeholders about how these issues can be addressed while contributing to the achievement of sustainable development through the promotion of *"a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects."*<sup>6</sup>
- 1.6 The Council undertook a call for sites consultation exercise between August and November 2021. As part of this exercise landowners, developers and other interested parties were

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<sup>1</sup> Available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

<sup>2</sup> PPG, Paragraph: 065 Reference ID: 61-065-20190723, available from: <https://www.gov.uk/guidance/plan-making>

<sup>3</sup> Op cit, see footnote 1

<sup>4</sup> London Plan (adopted 2 March 2021), available from: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

<sup>5</sup> For example, 'Making Bromley Even Better 2021-2031: Our Corporate Strategy', available from: <https://www.bromley.gov.uk/downloads/file/572/making-bromley-even-better-corporate-strategy->

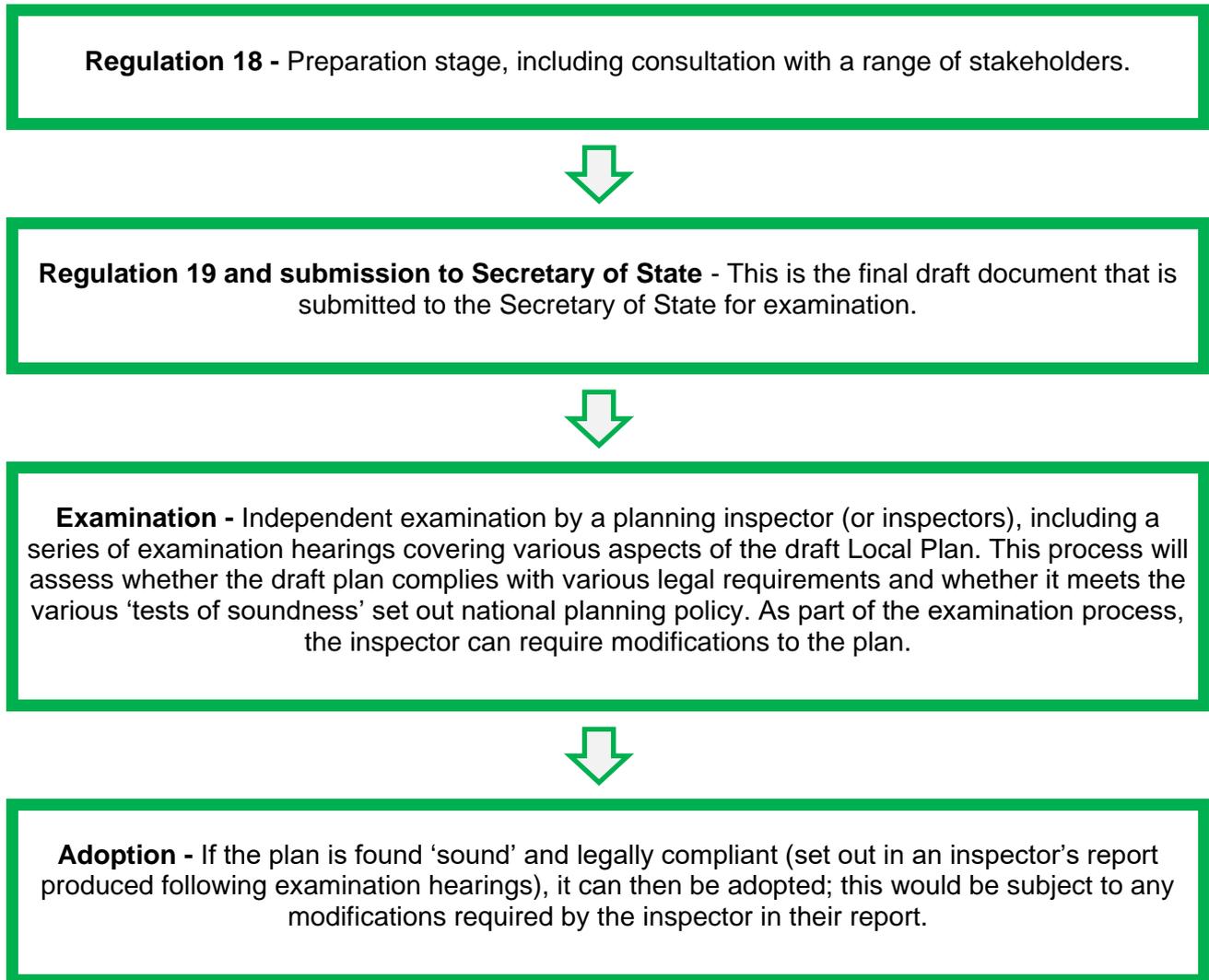
<sup>6</sup> NPPF, paragraph 11, op cit, see footnote 1

invited to put forward potential development sites for allocation, for development of housing, employment and retail uses or any other uses.

## New Local Plan process

- 1.7 The process of updating the Local Plan is complex and involves a number of statutory stages. Figure 1 sets out the process for updating the Bromley Local Plan:

**Figure 1 – New Local Plan process**



- 1.8 The Local Development Scheme (LDS)<sup>7</sup> sets out further detail on the Local Plan preparation, including indicative timeframes. The LDS sets out the intention to prepare a single Local Plan document, with no intention to update the Bromley Town Centre Area Action Plan (AAP) adopted in October 2010. The Council considers that a replacement AAP is unnecessary as relevant policy can be set out in a single Local Plan document and, where necessary, supporting guidance.

<sup>7</sup> Available from: <https://www.bromley.gov.uk/planning-policy/local-development-scheme>

- 1.9 The Council will adhere to relevant regulations and guidance as part of preparing the updated Local Plan. This will include public consultation at a number of stages; the adopted Bromley Statement of Community Involvement (SCI)<sup>8</sup> will inform the scope of any consultation exercise, in addition to any statutory requirements. The SCI notes the Council's commitment to maximising participation, with particular focus on 'hard to reach' groups; the scale of consultation and the methods used at any particular stage will depend on the:
- appropriateness of the method for that particular consultation;
  - nature of topic being considered;
  - geographic coverage of the document;
  - stage of the planning process reached;
  - need for specialist knowledge; and
  - availability of staffing and financial resources.
- 1.10 The SCI sets out resource implications for various consultation methods/techniques. Displays are identified as a consultation technique with high resource implications; hence use of displays may be limited as part of the ongoing Local Plan process. However, this will be kept under review as we progress through the review of the Local Plan, and will depend on issues that are raised through production of evidence and through representations received during consultation exercises.
- 1.11 A comprehensive evidence base will be prepared to inform the new Local Plan policies. Relevant evidence base documents will be made available as part of the consultation exercises, to set out justification for the draft policies and to help inform representations.
- 1.12 The NPPF requires strategic policies to look ahead over a minimum 15 year period from adoption. The new Local Plan period will therefore be likely to extend to 2040.
- 1.13 The new Local Plan will be subject to numerous statutory assessments. The Planning and Compulsory Purchase Act 2004 (as amended) requires Local Plans to be in 'general conformity' with the London Plan, i.e. Local Plans reflect the overall strategy for how London can develop sustainably, which the London Plan sets out.
- 1.14 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements; this includes compliance with the 'Duty to Co-operate', and the need to carry out a sustainability appraisal of the Local Plan to assess the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives (when judged against reasonable alternatives). The sustainability appraisal prepared as part of the new Bromley Local Plan will form part of an Integrated Impact Assessment (IIA), an approach which combines various assessments into a single comprehensive assessment.
- 1.15 Local Plans must also be 'sound' and address four 'tests of soundness' set out in the NPPF:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

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<sup>8</sup> Available from: <https://www.bromley.gov.uk/downloads/download/76/revise-statement-of-community-involvement---documents>

- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

1.16 The Department for Levelling Up, Housing and Communities (DLUHC) have consulted on proposed changes to the NPPF<sup>9</sup>, including changes to the ‘tests of soundness’ to remove the ‘justified’ test, which is intended to allow a more proportionate approach to the Local Plan examination; and amend the ‘positively prepared’ test to require Local Plans to seek to meet objectively assessed needs so far as possible (as opposed to the previous wording which required plans to seek to meet objectively assessed needs as a minimum).

1.17 A number of other proposed changes to the NPPF have been consulted on, and are referred to in this document where appropriate. The Government advises that a fuller review of the NPPF will be required in due course, and its content will depend on the implementation of the government’s proposals for wider changes to the planning system, including the Levelling-up and Regeneration Bill. The preparation of the Bromley Local Plan will have regard to any relevant legislative changes and revisions to the NPPF, in terms of implications for the required evidence base, spatial strategy and detailed policy drafting.

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<sup>9</sup> Levelling-up and Regeneration Bill: reforms to national planning policy (December 2022), available from: <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

## Issues and Options consultation

- 1.18 This Issues and Options document is a Regulation 18 stage draft. The document does not set out any intended policy approaches; the aim of the document is to gather views from a range of stakeholders to inform the development of the new Local Plan.
- 1.19 In terms of document structure, the Issues and Options document sets out the current policy approach across a range of topics; notes relevant changes since the adoption of the Local Plan<sup>10</sup>; and sets out how the new Local Plan could respond to these changes.
- 1.20 We have set out a number of questions for each topic area, to help focus representations on key issues, although representations are not required to address these questions.
- 1.21 Representations can be submitted as follows:

### How to respond

**By email:** [ldf@bromley.gov.uk](mailto:ldf@bromley.gov.uk)

**By online survey:** <https://www.surveymonkey.co.uk/r/LBBissuesandoptions2023>

**In writing:** Head of Planning Policy and Strategy, Bromley Council, Civic Centre, Stockwell Close, Bromley, BR1 3UH

Representations must be submitted by 23:59 on 30 June 2023. Any representations submitted may be made publicly available.

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<sup>10</sup> The relevant changes identified should not be considered exhaustive and there may be other changes to policy and guidance that also need to be taken into account when preparing the new Local Plan.

## 2. Vision, Objectives and Spatial Strategy

### What is our current approach?

- 2.1 The Local Plan is underpinned by the overall vision for the Borough through to the 2030s which is aspirational while realistic, and identifies key priorities for the Council each with more detailed visions and objectives, which the Local Plan will help deliver.

#### ***Vision - Bromley 2030's***

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

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

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

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

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

- 2.2 The Spatial Strategy sets out the strategic and spatial approach to delivering the vision and objectives for the Borough. It identifies the strategic focus for growth and change and the main locations of development, while ensuring conformity with the national and regional planning policy.
- 2.3 The Spatial Strategy in the adopted Local Plan identifies locations for strategic development and in broad terms the location for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated. Economic growth is focused on the three areas of Bromley Town Centre, Biggin Hill Strategic Outer London Development Centre (SOLDC), and the Cray Business Corridor. Housing growth is focused in town centres, and areas of good accessibility with smaller infill development likely across parts of the Borough. Social infrastructure is distributed across the Borough to serve local communities.

## What has changed?

- 2.4 The same issues that informed the adopted Local Plan vision objectives and spatial strategy are still evident, and perhaps even more pronounced. Census 2021 population statistics show that Bromley's overall population has increased by 7% since 2011. The number of people aged 65+ has increased by 12% from 2011. Bromley remains the least densely populated London borough.
- 2.5 The Council's new corporate strategy - Making Bromley Even Better 2021-2031<sup>11</sup> – was adopted in 2022 and sets out a vision for Bromley to be *"a fantastic place to live and work, where everyone can lead healthy, safe and independent lives"*. The vision is supported by five ambitions:
- "1. For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.*
  - 2. For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.*
  - 3. For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.*
  - 4. For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.*
  - 5. To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents."*
- 2.6 The Bromley Housing Strategy<sup>12</sup> sets out four key priorities to address housing need in the borough:
- "1. More homes – increasing the number of homes in Bromley.*
  - 2. Better quality, more affordable homes.*
  - 3. Preventing and tackling homelessness.*
  - 4. Supporting vulnerable people."*
- 2.7 The Housing Strategy sets out a number of goals linked to these priorities, with actions identified to achieve them.
- 2.8 Bromley published its first Economic Development Strategy<sup>13</sup> in 2021. The strategy sets out a vision of Bromley as *"a prosperous borough where businesses thrive, new businesses aspire to locate, and our residents experience high levels of employability."* The strategy has seven economic aspirations linked to this vision, with a number of objectives set out to realise these aspirations.

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<sup>11</sup> Op cit, see footnote 5

<sup>12</sup> Housing Strategy 2019-2029, available from: <https://www.bromley.gov.uk/downloads/file/1286/bromley-council-housing-strategy-2019-2029>

<sup>13</sup> Economic Development Strategy 2021 to 2031, available from: <https://www.bromley.gov.uk/downloads/file/1749/economic-development-strategy-2021-to-2031>

- 2.9 The Bromley Regeneration Strategy<sup>14</sup> was published in 2020. This document sets out the vision “to regenerate the borough of Bromley, building on its heritage, so that it continues to represent the best of town and country”. Five priorities (with associated actions) are identified to achieve this vision.
- 2.10 The NPPF was updated in July 2021: the following amendments are of particular relevance when considering an updated vision, objectives and spatial strategy for the new Local Plan:
- The NPPF includes specific reference to the 17 Global Goals for Sustainable Development<sup>15</sup> agreed by members of the United Nations (including the UK). The 17 goals address social progress, economic well-being and environmental protection, including specific goals on sustainable cities and communities, reduced inequalities, good health and well-being, climate action and life on land.
  - The presumption in favour of sustainable development was updated in relation to plan-making, to add reference to the need for all plans to promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.
  - Chapter 12 of the NPPF (Achieving well-designed places) was expanded, with a stronger emphasis on design and beauty. A change to Chapter 11 (Making effective use of land) advocated use of area-based character assessments, design guides and codes and masterplans to help ensure that land is used efficiently while also creating beautiful and sustainable places.
- 2.11 The new London Plan was adopted in March 2021. The new plan has a number of objectives and policies which should be considered as part of establishing an updated vision, objectives and spatial strategy for the new Local Plan, including:
- Good Growth objectives GG1 to GG6, which underpin the policies of the London Plan and aim to achieve sustainable growth - growth that is socially and economically inclusive and environmentally sustainable.
  - Policy SD1, which identifies Opportunity Areas, including Bromley Town Centre. The policy encourages Boroughs to clearly set out in their Development Plans how they will encourage and deliver the growth potential of Opportunity Areas; this includes supporting development which creates employment opportunities and housing choice, and recognising the role of heritage in place-making.
  - Policies D1 to D4, which outline the ‘design-led’ approach to development. The policies require Boroughs to undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas’ capacity for growth. These assessments should be used to identify suitable locations for growth when preparing Development Plans. Identification of locations should consider the provision of future planned levels of infrastructure rather than existing levels, and be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services.
  - Policies H1 and H2, which identify housing targets that Boroughs should plan for and include in their Development Plan Documents. Boroughs are required to prepare delivery-focused Development Plans which include allocation of an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification; and optimise the potential for housing delivery on all suitable and available brownfield sites including sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary, small sites

<sup>14</sup> Regeneration Strategy 2020 to 2030, available from:  
<https://cds.bromley.gov.uk/documents/s50083012/RegenerationStrategy.pdf>

<sup>15</sup> <https://sdgs.un.org/goals>

below 0.25 hectares in size, mixed use redevelopment of car parks, low density retail parks and supermarkets, and intensification of other low density sites in commercial, leisure or infrastructure uses. Policy H2 states that Boroughs should pro-actively support well-designed new homes on small sites.

- Policies E1 to E7, which concern employment land and require Boroughs to consider the need for office and industrial floorspace, both in terms of protection of existing floorspace and planning for new floorspace. For industrial land in particular, policies E4 to E7 provide a strong framework for the retention and enhancement of industrial land.
- Policy G1, which promotes a strategic approach to green infrastructure and encourages the production of green infrastructure strategies to inform Development Plans; this could support the identification of opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
- Policy T1, which sets out the strategic approach to transport and states that Development Plans should support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. The policy requires all development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

2.12 The former London Plan required Boroughs to identify, develop and promote SOLDCs, defined as business locations with specialist strengths which potentially or already function above the sub-regional level and generate growth significantly above the long term outer London trend; Crystal Palace and Biggin Hill were specifically identified as SOLDCs. The new London Plan does not continue the SOLDC designation.

## **How should the new Local Plan respond to these changes?**

- 2.13 The challenges facing Bromley are much the same as those we faced when preparing the adopted Local Plan – it is the largest Borough in London with a significant amount of Green Belt and Metropolitan Open Land, alongside nearly 50 Conservation Areas. However, Bromley also includes some significant swathes of brownfield land, notably in the north of the Borough, and in and around the Borough's numerous Town Centres.
- 2.14 The Local Plan Vision and Objectives will be revisited to ensure that they align with updated priorities in the Council's new corporate strategy and other published strategies, as set out above.
- 2.15 The Spatial Strategy in the adopted Local Plan is broadly still fit for purpose. However, given the updated Council priorities and changes to national and regional planning policy, it will be important to review the areas with significant opportunities for change and enhancement, as well as identifying any relevant new areas where new development can be accommodated. This could include additional site allocations with more detailed site-specific design parameters (see section 10 of this document for further discussion of site allocations).
- 2.16 Conversely, areas currently subject to significant protections, where development potential is more limited, will need to be reviewed in order to ensure that these protections can continue to be justified. The NPPF requires planning policies to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. The NPPF also attaches great importance to Green Belt / Metropolitan Open Land, with a clear expectation that any

alterations to Green Belt / Metropolitan Open Land will only be appropriate in exceptional circumstances which are fully evidenced and justified. Proposed changes to the NPPF in effect heighten the importance of the Green Belt.

- 2.17 The NPPF, at paragraph 105, directs significant development to locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas. There is similar sentiment at paragraph 119, which states that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 2.18 Bromley has a significant amount of employment land, including concentrations of office uses, and important industrial locations such as the Strategic Industrial Land in the Cray Valley. Maintaining and enhancing this employment land will be important in order to achieve economic growth aspirations. As such, the Spatial Strategy could include specific focus on economic areas which will help to achieve these aspirations (see section 4 of this document for further discussion of employment land).
- 2.19 The Council have prepared Supplementary Planning Documents (SPDs) to provide further guidance for development in Bromley and Orpington Town Centres. These areas are the two most significant town centres in the Borough, with a number of sites which could accommodate new development, particularly housing and commercial development. The new Local Plan could build on this guidance to put in place detailed policy requirements for development in the town centres, to facilitate new development which meets identified housing and employment needs while protecting the character of the areas. Other town centres across the Borough may also provide opportunity for new development, commensurate with the size of each centre and its role in the Borough's retail hierarchy.
- 2.20 One of the key changes to national and regional planning policy since the adoption of the Local Plan has been the increased emphasis on design and beauty. The new Local Plan is an opportunity for the Council to set out expectations for design in the Borough, and define what we consider to constitute 'beauty' in a Bromley context. Following the adoption of the Local Plan in 2019, the Council have prepared the Urban Design Guide SPD<sup>16</sup> to provide detailed guidance on design, but the new Local Plan will allow the Council to embed key design principles and requirements into the Local Plan itself, to ensure that the achievement of high quality design is central to the Local Plan. A robust evidence base, including a characterisation study of the Borough, would be necessary to inform such requirements.
- 2.21 This evidence base could also inform Bromley's approach to development of small sites, which the London Plan identifies as a potential source of new housing supply. Any increase in supply from smaller sites will need to be accompanied by clear design parameters to ensure that any small sites development is not significantly out-of-character, relative to specific areas of the Borough.
- 2.22 Policies 13 and 14 of the adopted Local Plan set out requirements for development in renewal areas, which are spatial designations focused on the borough's most deprived areas. Within renewal areas, the Council seeks to maximise opportunities for enhancement and improvement; development proposals should provide demonstrable economic, social and environmental benefits and address identified issues and opportunities, including those set out in Policies 15 to 19 which focus on each of the five specific renewal areas. The rationale for a specific policy approach to enhance and improve the Borough's most deprived areas is

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<sup>16</sup> Available from: <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

still justified, although there may be scope to merge the renewal area approach into the overarching spatial strategy to ensure that issues are considered holistically. Data which identifies the most deprived areas has been updated in recent years, therefore any continued focus on deprived areas as part of the new spatial strategy should take account of any changes.

- 2.23 Tackling Climate Change and reducing carbon emissions is an issue of international, national and regional significance. In 2019, the Government amended the Climate Change Act 2008 to introduce a legal requirement to reach net zero emissions by 2050<sup>17</sup>. Bromley Council have committed to becoming a 'direct' net zero carbon emission organisation by 2027.
- 2.24 Climate Change is an issue that cuts across a number of policy areas and the Local Plan will need to respond to this, from the overarching Spatial Strategy to policies on green infrastructure, design and transport. The NPPF promotes development in sustainable locations which limit the need to travel and offer a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, the NPPF acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas (such as Bromley), and this should be taken into account in plan-making.

## **Let us know your thoughts on the vision, objectives and spatial strategy for the new Local Plan**

**Q1: What do you think are the key issues that should be reflected in the new Local Plan Vision and Objectives?**

**Q2: What do you consider to be the major challenges the Borough should address over the next 15 years?**

**Q3: Where do you think new development should be focused?**

**Q4: What are the major constraints to development in Bromley that we should consider as part of developing a new Spatial Strategy?**

**Q5: Is there any specific issue that you think we should take into account when preparing evidence to support the new Local Plan policies?**

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<sup>17</sup> Climate Change Act 2008 (as amended), available from: <https://www.legislation.gov.uk/ukpga/2008/27/section/1>

# 3. Housing

## What is our current approach?

- 3.1 The Bromley Local Plan sets out policies covering all aspects of housing, including identifying housing targets and suitable locations for housing; setting out affordable housing requirements; and providing guidance on housing design, residential extensions and conversions.
- 3.2 Policy 1 sets a broad range of locations where new housing will be developed to meet the Borough housing target, including allocated sites and town centres. Delivery of housing on small sites – less than 0.25 hectares – is also identified as an important element of housing supply. The Bromley Town Centre Opportunity Area is identified in the Local Plan and London Plan as an area for housing growth, with an indicative target of 2,500 homes to be delivered.
- 3.3 Policy 2 sets out the threshold for affordable housing provision, and policy on the required affordable housing tenure and housing size mix, informed by a Strategic Housing Market Assessment (SHMA). The policy mirrors the approach set out in the London Plan, whereby provision above 35% that also addresses other policy requirements is not required to provide viability evidence to justify the proposed provision. Exceptional circumstances where the Council would accept off-site affordable housing or payments in lieu are also set out.
- 3.4 The Local Plan includes a policy which supports the provision of specialist and older peoples accommodation. It also allocates a number of sites to help meet an identified need for Gypsy and Travellers and Travelling Showpeople, and sets out criteria that any new sites should accord with.
- 3.5 A number of Local Plan policies relate to householder applications, including policies on residential extensions and conversions. Policy 3 concerns backland and garden land development, setting out that residential development will only be considered in these locations where specific criteria is met.

## What has changed?

- 3.6 The Bromley Corporate Strategy commits to delivering the housing targets set out in the Local Plan. The adoption of the new London Plan has increased Bromley's housing target from 641 units per annum (as set out in the adopted Local Plan) to 774 units per annum. This creates additional challenges in terms of finding new sites for housing development and optimising the capacity of housing sites in a way that also preserves Bromley's character.
- 3.7 In July 2020, the Council approved the re-opening and setting up of a Housing Revenue Account (HRA) for the provision of affordable housing and has recently been developing housing on Council-owned land.
- 3.8 The new London Plan sets out the following policies to increase housing supply:
  - Policy H1 requires boroughs to prepare delivery-focused Development Plans which allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification, and optimise the potential for housing delivery

on all suitable and available brownfield sites through their Development Plans and planning decisions, including sites with existing or planned PTALs 3-6 or which are located within 800m distance of a station or town centre boundary. It is noted that this can take a number of forms, such as new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision.

- Policy H2 states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making; the policy sets out an indicative small site housing target, although this is a component of the overall housing target, not a specific target to be met in its own right in addition to the overall housing target. The policy also requires boroughs to recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites; identify and allocate appropriate small sites for residential development; and where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites.

- 3.9 The NPPF, at paragraph 69, also recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and states that local planning authorities should identify, through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless there are strong reasons why this cannot be achieved. The NPPF also advocates the use of tools such as area-wide design assessments to help bring small and medium sized sites forward;
- 3.10 The new London Plan has retained the Bromley Town Centre Opportunity Area designation, which identifies an indicative capacity of 2,500 new homes and 2,500 new jobs in the town centre. Policy SD1 sets out policy concerning Opportunity Areas, stating that boroughs should clearly set out how they will encourage and deliver the growth potential of Opportunity Areas in their development plans; and should support development which creates employment opportunities and housing choice for Londoners. London Plan Policy H1 notes that boroughs should enable the delivery of housing capacity identified in Opportunity Areas, working closely with the Greater London Authority (GLA), to help achieve housing targets.
- 3.11 London Plan Policy H1 states that boroughs should establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value. The NPPF sets out definitions for 'deliverable' sites, i.e. sites which are expected to come forward within five years; and 'developable' sites or locations, i.e. sites or locations which are considered likely to come forward in the longer-term.
- 3.12 The NPPF and London Plan affordable housing threshold has also changed, to align with the definition of major development as set out in legislation, i.e. development proposals providing 10 residential units or more. The Local Plan has a different threshold, instead seeking affordable housing on all housing developments capable of providing 11 residential units or more or where the residential floorspace is more than 1000sqm, irrespective of the number of dwellings.
- 3.13 The NPPF also states that provision of affordable housing should not be sought for residential developments that are not major developments; and expects that at least 10% of the total number of homes delivered as part of major housing development be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.
- 3.14 The Bromley Corporate Strategy sets out the aim to ensure the delivery of 1,000 new affordable quality homes; and that the housing needs and aspirations of more vulnerable

people, including adults who have learning disabilities and older people, feature consistently in the development and delivery of our housing plans. Bromley's affordable housing completions in recent years have been low, with approximately 400 affordable units completed since 2017/18<sup>18</sup>.

- 3.15 The new London Plan incorporates the threshold approach to affordable housing, first introduced in the Affordable Housing and Viability Supplementary Planning Guidance (SPG) and reflected in the adopted Bromley Local Plan. The London Plan policy has a higher threshold for public sector land and industrial land.
- 3.16 The NPPF definition of affordable housing was updated in 2018, with further amendments to PPG published in 2021 relating to the Government's new 'First Homes' tenure, a specific kind of discounted market sale housing.
- 3.17 London Plan policy H6 sets out new policy on affordable housing tenures that should be sought as part of new development, informed by evidence from the London-wide SHMA. The policy requires:
- a minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
  - a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership; and
  - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products based on identified need.
- 3.18 Policy D3 of the new London Plan replaced the density matrix approach, which set out a range of suitable housing densities, with a design-led approach, which requires all development to make the best use of land to ensure that site capacities are optimised. This means ensuring that development is of the most appropriate form and land use for the site, and that different design options are considered to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.
- 3.19 The new London Plan has policies covering various forms of housing, including build to rent (policy H11), supported and specialised accommodation (policy H12), specialist older persons housing (policy H13), gypsy and traveller accommodation (policy H14), purpose-built student accommodation (policy H15) and large-scale purpose-built shared living (policy H16). The NPPF requires local planning authorities to assess the size, type and tenure of housing needed for different groups in the community, including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. Where need for such housing is established, it is expected that local planning policies would aim to address this need.
- 3.20 The Self-build and Custom Housebuilding Act 2015 and the Self-build and Custom Housebuilding (Register) Regulations 2016, places a duty on the council to keep a register for people who are interested in a self-build or custom-build home in the London Borough of Bromley.

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<sup>18</sup> Mayor of London Affordable Housing statistics, available from: <https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/affordable-housing-statistics>

## How should the new Local Plan respond to these changes?

- 3.21 Identifying sufficient housing supply to meet housing targets will be a key challenge for the new Local Plan. A significant element of housing supply is likely to be delivered from large sites (0.25 hectares or more), and the Local Plan can play a significant role in bringing such sites forward by allocating them for development. Any allocated sites would be identified in accordance with the Local Plan spatial strategy, which will identify locations for strategic development and in broad terms the location for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated. Detailed evidence will be compiled to inform the spatial strategy, including a characterisation study.
- 3.22 The NPPF, at paragraph 119, is clear that objectively assessed needs (such as housing need) is accommodated in a way that makes as much use as possible of previously-developed or 'brownfield' land; and at paragraph 105, the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The London Plan policy H1 echoes the NPPF, requiring boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites.
- 3.23 The site allocations in the adopted Local Plan have basic parameters in terms of site specific requirements. Considering the London Plan shift to a design-led approach, any site allocations in the new Local Plan could set out more detailed parameters, including detailed design requirements relating to height, scale, massing and other components of design. This would serve to give a realistic indication of housing capacity on sites, which would help to demonstrate deliverability of sites, give more certainty to site owners about what is considered suitable and ultimately assist with the adoption of a delivery-focused Local Plan as per London Plan requirements.
- 3.24 Small sites currently play an important role in housing delivery in Bromley, and will continue to do so. Some intensification of small sites delivery, increasing the current rate of delivery, could be investigated, in line with London Plan policy H2 requirements; however, any intensification would need to be particularly mindful of the borough's predominantly suburban, low-rise character. Tools such as design codes could be put in place to set clear parameters for such intensification. This could cover different geographies, for example covering a specific site or a broad area.
- 3.25 Maximising affordable housing delivery is also a key issue for the Local Plan, reflecting policy requirements in the London Plan and NPPF, and Council priorities. A new SHMA will be prepared to provide updated evidence on affordable housing need, which will inform any new policy on affordable housing in terms of the tenure, type and amount of affordable housing sought, along with requirements set out in the NPPF and London Plan. While noting the NPPF policy limiting the ability of local planning authorities to seek affordable housing on non-major development, such provision could help improve affordable housing delivery to help address identified need, either through direct provision of homes or through financial contributions. A small sites affordable housing requirement could therefore be explored as part of the new Local Plan.
- 3.26 Viability considerations also need to be taken into account when preparing the Local Plan policies; any level of affordable housing sought in the new Local Plan will need to be viable. This will be considered as part of an overarching Local Plan viability study.
- 3.27 The new SHMA will also inform new policy on the required housing size mix, in terms of what size units are needed as part of new housing development; and set out evidence of need for

different types of housing, such as older persons accommodation. Updated evidence on gypsy and traveller need will also be sought. Evidence of need for these different types of housing will be used to inform the development of Local Plan policies for each different type of housing.

- 3.28 The adopted Local Plan has a policy on houses in multiple occupation (HMOs), which sets out criteria to assess potential adverse impacts that may arise from such development. The Council has put in place article 4 directions to remove C3 to C4 permitted development (PD) rights, covering the entire borough this means that all HMOs will now need planning permission. The Local Plan review gives an opportunity to revisit this policy to ensure that the full range of potential impacts associated with HMOs can be adequately assessed.
- 3.29 New housing typologies and development models have emerged in recent years and are reflected in the London Plan and NPPF, such as large-scale purpose-built shared living (also known as co-living accommodation) and purpose-built private rented sector accommodation (also known as 'build to rent'). The Local Plan could set out local-specific policy for such housing, potentially including specific locations may be suitable. Any policy could also reflect the impact that certain typologies may have on delivering Council priorities, for example co-living proposals do not usually propose on-site affordable housing, meaning that such developments will have a lesser contribution towards meeting Bromley's affordable housing need.

## **Let us know your thoughts on Housing policy**

**Q6: Where should new housebuilding be focused in the borough, in order to meet housing need?**

**Q7: Is there a particular form of housing development that you feel is appropriate to facilitate the delivery of additional housing in the Borough, e.g. through development of taller buildings; delivery from smaller sites (less than 0.25 hectares); or infill development?**

**Q8: Do you think the Council should set out site-specific design parameters and seek to put in place detailed guidance and utilise tools such as design codes to guide housing development in the Borough?**

**Q9: How important is the delivery of affordable housing, and what (if any) specific affordable housing tenures should be prioritised, e.g. social rent, low cost home ownership?**

**Q10: Do you think the Council should investigate the potential for seeking affordable housing on small sites (fewer than 10 units)?**

**Q11: What size of new homes do you think should be prioritised?**

**Q12: What (if any) types of housing, other than conventional self-contained dwellings, do you think the Council should prioritise as part of the new Local Plan?**

**Q13: Is there anything else that you feel we need to address through the new Local Plan housing policies?**

# 4. Employment, Retail and Leisure

## What is our current approach?

- 4.1 Chapter 6 of the Local Plan – Working in Bromley – sets out the planning policies to deliver forecast significant employment growth and the business and Town Centre objectives.
- 4.2 Policy 80 identifies three strategic priority areas for economic growth; Bromley Town Centre, the Cray Business Corridor, and Biggin Hill SOLDC.
- 4.3 Policy 81 concerns the Strategic Industrial Locations (SILs) within the Cray Business Corridor. The Corridor represents just under 40% of all designated industrial/employment land in the Borough and includes St Mary Cray, the largest industrial/employment area in the Borough. The policy seeks to safeguard existing industrial/employment uses and encourages new industrial/employment floorspace.
- 4.4 Policy 82 covers Locally Significant Industrial Sites (LSISs), which provide a wide range of premises for industrial/employment uses across the Borough. New industrial/employment uses are prioritised in LSISs, and loss of such uses must be robustly justified, including a requirement for active marketing.
- 4.5 Outside of designated areas, Policy 83 seeks improvements to the quality and quantity of employment floorspace on sites containing existing industrial and related employment uses. Proposals involving the change of use from employment floorspace to a non-employment generating use must address specific criteria.
- 4.6 Policy 84 identifies three Business Improvement Areas (BIAs) in Bromley Town Centre, where the Council will seek to manage and improve the supply of high quality office floorspace. Policy 85 identifies three office clusters elsewhere in the Borough, within which the Council seeks to retain and manage an adequate stock of good quality office floorspace.
- 4.7 Policies 103 to 110 relate to the Biggin Hill SOLDC<sup>19</sup>. The policies provide a strategic framework for economic growth at Biggin Hill Airport and the adjoining Biggin Hill LSIS, with a primary focus on aviation-related activities and associated business infrastructure and amenities. The policies also aim to minimise adverse impacts on the environment and the amenity of surrounding communities.
- 4.8 Policy 91 requires main town centre uses to be located within town centres. All proposals for main town centre uses outside of existing centres are required to meet the sequential test; larger proposals for main town centre uses (over 2,500sqm) outside of existing centres are required to provide an impact assessment.
- 4.9 The Local Plan sets out a hierarchy of town centres, reflecting the London Plan town centre network classifications:
  - Bromley Town Centre is identified as a metropolitan town centre and is the Borough's largest town centre. It is also identified as an Opportunity Area (Local Plan Policy 90) with

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<sup>19</sup> As noted in paragraph 2.12, the new London Plan does not continue the SOLDC designation.

an indicative capacity of 2,500 homes and 2,000<sup>20</sup> new jobs in the town centre. Policy 93 prioritises retail uses in the Glades Shopping Centre in order to ensure that the centre's primary retail function is not adversely affected.

- Orpington Town Centre is a major town centre and the second largest retail centre in the Borough.
- Beckenham, Crystal Place, Penge, Petts Wood and West Wickham are identified as district centres, which generally provide convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling.
- Biggin Hill, Chislehurst, Hayes, Locksbottom and Mottingham are identified as Local centres. These are a Bromley-specific designation which provide a range of shops and services to meet the needs of local communities.
- Policy 96 identifies a number of neighbourhood centres, local parades and individual shops. The main function of these local shops is to provide for the day to day needs of local residents, especially those who are less mobile and unable to reach larger centres.

4.10 The Local Plan designates primary and secondary frontages within metropolitan, major and district town centres. These frontages are the main focus for retailing activities within the respective Town Centres. New restaurant, café, drinking establishment and hot food takeaways are supported where certain criteria is met, including amenity considerations.

4.11 Residential uses are supported on upper floors in town centres where the proposed accommodation can address criteria relating to amenity, living conditions and compatibility with adjacent/adjoining uses. Residential uses at ground floor level may be acceptable outside town centre frontages, where various requirements are met including demonstrating that the retail vitality and viability of the centre will not be undermined.

4.12 Hotels are supported within town centres and on the edge of the two largest town centres, where there are no unacceptable impacts on local amenity.

4.13 The Local Plan also promotes the role of existing and new markets.

4.14 Policy 23 concerns Public Houses, which have a dual commercial and community role. The policy resists the loss of Public Houses unless specific criteria is met, including the need to ensure continued accessible Public House provision in the local area; and a requirement to demonstrate that the Public House is no longer financially viable (which should include submission of active marketing evidence for a substantial period of time).

4.15 Policy 111 relates to the Crystal Palace SOLDC<sup>21</sup>, which is identified due to its specialist economic functions of more than sub-regional importance related to leisure, tourism, arts, culture and sports. The SOLDC boundary covers Crystal Palace Park. Development proposals are expected to maintain, enhance and support these unique functions and be consistent with the objective identified as part of the approved masterplan for the park.

## What has changed?

4.16 The Bromley Corporate Strategy sets out an ambition for business and enterprise to prosper, to be achieved by maintaining a strong focus on encouraging and enabling further economic growth and regeneration in Bromley, prioritising town centres as great places for business, enterprise, and social enterprise to prosper.

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<sup>20</sup> For clarity, the new London Plan (adopted March 2021) updated the indicative new job capacity figure to 2,500 – see paragraph 4.24 below.

<sup>21</sup> Ibid

- 4.17 The Bromley Regeneration and Economic Development strategies set out a proactive approach to support existing businesses whilst encouraging new businesses to develop and thrive. These strategies set out the Council's aim to support economic growth and the key priority areas that will enable the achievement of this desired growth over the next 10 years. They provide useful context for the review of the Local Plan.
- 4.18 The changes to the Use Class Order, particularly the introduction of Use Class E, pose a significant challenge in terms of planning for employment, retail and leisure uses in Bromley. The new use class introduces greater flexibility to move between different types of office, retail and employment uses; while this could provide some benefits in terms of increasing diversity in town centres and allowing occupiers to adapt to changing market demands, it will also undermine the Council's ability to plan for specific types of floorspace that may be required, and could undermine provision of office space and essential services in other parts of the borough. NPPF policy relating to town centres and economic growth remains similar, promoting main town centre uses within town centres and requiring applications for such uses outside of town centres to be sequentially justified; an impact assessment may also be required in defined circumstances. A recent update to the NPPF has removed the requirement for LPAs to define primary and secondary frontages in town centres; instead, LPAs should identify primary shopping areas where retail development is concentrated.
- 4.19 New PD rights have also been introduced, including a PD right which allows Use Class E units to change to residential use, pending prior approval of certain issues. The Council has put in place a number of article 4 directions to remove PD rights in various parts of the Borough, including town centres, because of concerns that the PD rights will have a significant adverse impact on commercial areas that play an important role in the local and sub-regional economy.
- 4.20 The new London Plan has policies which seek to increase office provision in town centres, noting that Bromley Town Centre has potential to accommodate new office development, generally as part of mixed-use developments. Locally-oriented town centre office provision is also encouraged, to meet local needs.
- 4.21 The London Plan also promotes provision of a range of business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. It also encourages Boroughs, in their Development Plans, to consider detailed affordable workspace policies in light of local evidence of need and viability.
- 4.22 With regard to industrial land, the London Plan has a strong emphasis on providing a sufficient supply of land and premises to meet current and future demands for industrial and related functions. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution (as set out in policy E7 of the London Plan); and should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.
- 4.23 The London Plan requires Boroughs, through their Development Plans, to develop local policies to protect and intensify the function of SILs, reflecting the importance of SIL to the effective functioning of London's economy. Bromley has a designated SIL at St Mary Cray. The London Plan also encourages Boroughs to designate and define detailed boundaries and policies for LSISs, making clear the range of industrial and related uses that are acceptable in these areas.

- 4.24 The new London Plan retains the Bromley Town Centre Opportunity Area designation, which identifies an indicative capacity of 2,500 new homes and 2,500 new jobs in the town centre; this is an increase of 500 jobs from the figure in the adopted Local Plan. Policy SD1 of the London Plan sets out policy concerning Opportunity Areas, stating that boroughs should clearly set out how they will encourage and deliver the growth potential of Opportunity Areas in their development plans; and should support development which creates employment opportunities and housing choice for Londoners.
- 4.25 Policies SD6 and E9 of the London Plan aim to ensure the vitality and viability of London's varied town centres is promoted and enhanced through a range of measures, encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses. The changing roles of town centres should be proactively managed in relation to the town centre network as a whole, as set out in Annex 1 of the London Plan. The town centre classifications for Bromley remain the same as those identified in the adopted Local Plan.
- 4.26 The NPPF, and Policy D13 of the London Plan, have introduced the agent-of-change principle, which aims to ensure that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established; this is particularly relevant where new housing is proposed in close proximity to existing noise and other nuisance-generating uses.
- 4.27 Policy E9 states that development proposals containing hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs can set a locally-determined boundary from schools in their Local Plan, but must ensure this is sufficiently justified.
- 4.28 Policies HC5, HC6 and HC7 of the new London Plan promote cultural uses, the night-time economy and public houses:
- Policy HC5 states that Development Plans should protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues; and identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal.
  - Policy HC6 states that Boroughs should develop a vision and policies to support the growth and diversification of the night-time economy, in particular within strategic areas of night-time activity identified in Annex 1 of the London Plan; Bromley Town Centre is identified as an area of regional or sub-regional significance in terms of its night-time economy function, and Beckenham Town Centre is identified as an area with more than local significance. Bromley Town Centre has also been identified as a Night Time Enterprise Zone<sup>22</sup> and secured funding to develop a range of activities and programmes to make streets more welcoming after 6pm and supporting businesses, encouraging greater use of the town centre at night.
  - Policy HC7 directs Boroughs to protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives, e.g. for town centres.
- 4.29 Policy E10 aims to strengthen London's visitor economy by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting

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<sup>22</sup> <https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/night-time-enterprise-zones>

infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors. In Outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test) where they are well-connected by public transport, particularly to central London.

- 4.30 As noted in paragraph 2.19, the Council have prepared SPDs for Bromley and Orpington Town Centres. These documents provide guidance to assist with the implementation of adopted Development Plan policies that relate to respective centres.
- 4.31 Policy E11 of the London Plan states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.

### **How should the new Local Plan respond to these changes?**

- 4.32 A robust, up-to-date evidence base is essential in order to identify potential policy approaches to planning for office, industrial, retail and leisure uses. This evidence would, as a minimum, look at need and demand for such uses, but provides an opportunity to develop detailed information on where such uses are needed and the types of floorspace required, and to gauge any need for affordable workspace. The updated evidence will need to reflect relevant policy and guidance, including the new London Plan's strong emphasis on protecting and intensifying industrial uses. With reference to retail, any updated evidence will need to consider the increasing impact of online shopping on demand for high street retail uses.
- 4.33 The ongoing impacts of increased home working following the outbreak of the COVID pandemic is a particular trend that could affect future demand for certain types of employment floorspace; updated evidence should factor this and other relevant trends into any assessment of employment floorspace need. Anecdotally, the pandemic seems to have led to a re-appreciation of the value of local shopping centres, with residents making more use of local shops and services that are accessible on foot and by other sustainable modes of transport. Updated retail evidence could explore the extent of this trend, and whether there are any longer-term benefits for local centres that might arise as a result.
- 4.34 The Local Plan currently sets out a range of employment designations. New evidence will provide information on the effectiveness of these designations and set out suitable uses that could be accommodated within such areas. The new evidence may also help to inform the designation of new or expanded employment areas.
- 4.35 Policy at the national and regional levels promotes retail and commercial activity in town centres and aims to resist development of such uses in out-of-centre locations. Updated retail healthchecks will help to determine the health of existing town centres and smaller local parades, and could inform expanded or amended centres where appropriate; and support strengthened policy which looks to prioritise town centre uses in town centre locations. Bromley's larger retail designations remain unchanged in the London Plan, but there is an opportunity for the new Local Plan to provide further policy and guidance for these larger centres, including building on the guidance set out in the Bromley and Orpington Town Centre SPDs. The borough has a number of smaller local centres that fall outside the ambit of the London Plan. These areas help to ensure accessible provision of daily essential goods and services, and protecting this accessible provision will be an important objective for the new Local Plan.

- 4.36 There is an increased emphasis (in national and regional planning policy) on accommodating housing in commercial areas, particularly town centres; Bromley Town Centre retains its Opportunity Area status in the London Plan, which sets out an indicative target of 2,500 homes for the town centre. In principle, residential uses are a suitable town centre use and can add diversity to such areas; however, if such uses are poorly located or designed, they can cause adverse impacts for businesses, for example through increases in noise complaints. The new Local Plan will need to balance these issues, which should include consideration of the agent-of-change principle as per NPPF and London Plan policy.
- 4.37 The introduction of Use Class E will undoubtedly limit the scope of town centre policies, but the Local Plan could investigate options to ensure some continued control over town centres uses, for example through use of appropriate planning conditions. Recently introduced PD rights also create the potential for adverse impact on the commercial function of Bromley's various town centres. The new Local Plan and its supporting evidence will help to provide continued justification for existing article 4 directions, and will provide a strong basis for future article 4 directions if further damaging PD rights are introduced.
- 4.38 The London Plan sets out detailed policy relating to leisure, culture and the night-time economy. The adopted Local Plan has limited focus on these areas, but the new Local Plan could look to set out proactive policies to support new leisure, culture and the night-time economy, while ensuring that potential adverse impacts are suitably mitigated.
- 4.39 As the adopted Local Plan SOLDC designations have been 'orphaned' by changes to the London Plan, it is not considered appropriate to continue with these designations in this form. However, there may still be justification to continue with distinct spatial policies at the two existing SOLDC locations - Biggin Hill and Crystal Palace. The updated employment, retail and leisure evidence base will help to set out justification for any new policy approach.

### **Let us know your thoughts on Employment, Retail and Leisure policy**

**Q14: Are the existing strategic priority areas for economic growth - Bromley Town Centre, the Cray Business Corridor, and Biggin Hill – still justified? Are there any other areas that you think should be a focus for economic growth?**

**Q15: Do existing designations for industrial and commercial uses ensure sufficient protection for these uses? Are there any changes to these areas that you think could be made, e.g. to ensure that they remain protected, or to relax protections and allow for development of other uses?**

**Q16: What types of employment use do you think we should plan for in Bromley, e.g. industrial, office, retail? Are there any existing employment designations where we should plan for intensification or expansion of employment use, e.g. an extension of SIL boundaries. Are there any new areas that we should designate for a particular employment use?**

**Q17: What can we do to attract businesses to locate in Bromley and help existing businesses to grow, e.g. is there a need for affordable workspace, or are there particular types of employment space that are required?**

**Q18: How can new development enhance employment and training opportunities?**

**Q19: What are your thoughts on existing town centres in Bromley? What aspects of these centres do you value most, and what could be improved in these centres?**

**Q20: What are your views on diversifying town centres to broaden their role, e.g. introducing uses such as residential and expanding cultural and night-time economy uses?**

**Q21: Is there anything else that you feel we need to address through the new Local Plan employment, retail and leisure policies?**

# 5. Design and Conservation

## What is our current approach?

- 5.1 The adopted Local Plan sets out the borough's planning policies and reflects its commitment to improving the quality of the natural and built environment. The Local Plan is underpinned by Bromley's 2030 vision for high quality living, working, historic and natural environments, including its valued and distinctive neighbourhoods. New development of all kinds should be well-designed, safe, energy-efficient and should complement the surroundings, respecting scale and layout.
- 5.2 The key objectives for Design and the Public Realm are to:
1. Ensure development attains high-quality design standards
  2. Ensure development includes appropriate well-planned private or public open space that promotes and enhances biodiversity
  3. Ensure public areas are well designed, safe, and accessible
- 5.3 General design requirements are set out in Policy 37 – General Design of Development. This policy requires all development proposals to be of a high standard of design and provides specific criteria in relation to architectural quality (scale, form, layout and materials), context (townscape character and heritage), spaces between buildings (hard and soft landscaping), amenity (daylight and sunlight), access and inclusion, and sustainable design and construction.
- 5.4 Policy 47 – Tall & Large Buildings – sets out further general design requirements, requiring tall and large buildings to make a positive contribution to the immediate setting and the wider townscape, appropriate to their location/context and to be of the highest architectural design quality. Policy 48 – Skyline – requires development to protect or enhance specific views and landmarks.
- 5.5 General design guidance is supplemented with specific policies related to various Local Plan topic areas. Policies 38 to 46 include requirements for statutory listed buildings, locally listed buildings and non-designated heritage assets, conservation areas and areas of special residential character, in order to preserve and enhance the character and appearance of valued assets and distinctive settings. Policy 4 provides detail on housing design, stating that all new housing developments will need to achieve a high standard of design and layout while enhancing the quality of local places, and respecting local character, spatial standards, physical context and density. The policy includes specific requirements on space standards and accessibility, reflecting London Plan policy. Policies 6, 8 and 9 of the Local Plan concern residential extensions, side space and conversions; the policies set out design criteria and other requirements to guide these types of householder development.
- 5.6 Policies on other topics such as green infrastructure, social infrastructure, sustainable design and transport also include specific requirements on design. Similarly, policies 119, 121 and 122 concern noise pollution, ventilation and odour control and light pollution, issues are all relevant to design.

## What has changed?

- 5.7 Changes to national and regional planning policy have emphasised the importance of good design to achieving sustainable development, creating better places in which to live and work and making development acceptable to communities i.e. placemaking.
- 5.8 Revisions to chapter 12 of the NPPF make clear that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. To provide maximum clarity about design expectations at an early stage, all LPAs are encouraged to prepare design guides or codes consistent with the principles set out in the National Design Guide<sup>23</sup> and National Model Design Code<sup>24</sup>, and which reflect local character and design preferences.
- 5.9 Chapter 3 of the new London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment. The chapter is broken down into 14 individual design policies, each with specific criteria and supporting text. This includes policy D9 which sets out a plan-led approach to tall buildings. The policy requires LPAs, through their Development Plans, to define what is considered a tall building for specific localities, based on local context. LPAs should determine if there are locations where tall buildings (based on a local definition) may be an appropriate form of development (subject to meeting the other requirements of the Plan). Where such locations are established, these should be clearly identified on the Policies Map and tall buildings should only be developed in these locations.
- 5.10 In addition to the suite of design policies, policy H2 of the London Plan states that boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through plan-making in order to significantly increase the contribution of small sites to meeting London's housing needs.
- 5.11 To support the implementation of the new London Plan policies, the GLA have prepared London Plan Guidance (LPGs) relating to characterisation, optimising site capacity, small sites and housing design standards<sup>25</sup>.
- 5.12 The Council have prepared the Urban Design Guide SPD to provide clear guidance on urban design to inform and engage developers, applicants, planning officers, residents and all other interested parties in bringing forward proposals for development in Bromley. The document sets out the principles for achieving good design with the aim of significantly raising the quality of development within the borough.
- 5.13 The NPPF and the London Plan both advocate the use of independent design review panels (DRP) to assess and inform design options early in the planning process in order to guide better design outcomes. Policy D4 of the London Plan states that all major development proposals referable to the Mayor of London must be subject to design scrutiny by an independent DRP and must undergo at least one design review as part of the pre-application process.

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<sup>23</sup> National Design Guide, available from: <https://www.gov.uk/government/publications/national-design-guide/national-design-guide-accessible-version>

<sup>24</sup> National Model Design Code, available from: <https://www.gov.uk/government/publications/national-model-design-code>

<sup>25</sup> LPGs available from: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63501>

5.14 As noted in paragraph 4.26, the agent-of-change principle has been introduced to mitigate or prevent adverse impacts as a result of new development being located in close proximity to existing noise and other nuisance-generating uses; mitigating impacts is likely to have implications for the design of a scheme.

## **How should the new Local Plan respond to these changes?**

- 5.15 One of the key changes to national and regional planning policy since the adoption of the Local Plan has been the increased emphasis on design and beauty. The new Local Plan is an opportunity for the Council to set out detailed expectations for achieving, delivering and maintaining design quality in the Borough, and define what we consider to constitute 'beauty' in a Bromley context. A comprehensive, up-to-date evidence base will be essential to inform such expectations. As a minimum, this will include a Borough-wide characterisation study and evidence to inform the Council's approach to tall buildings (as required by London Plan policy D9). Evidence may also be required to address London Plan policy H2 to help determine if there are any appropriate locations to accommodate additional housing on small sites, without causing significant impacts on local character.
- 5.16 The Local Plan could enshrine key design principles and parameters, with further detail provided in supplementary guidance. This could include a retained Urban Design Guide SPD, potentially supplemented with detailed design codes where appropriate.
- 5.17 A number of specific design requirements are set out in the London Plan, for example requirements for internal space standards and accessible units. The Local Plan will not need to repeat these requirements but there may be other design requirements specific to certain types of development that can be put in place, for example, guidance on specific housing typologies. As part of the evidence gathering to inform various Local Plan topic areas, the need for specific requirements can be established.
- 5.18 Conserving and enhancing the historic environment remains a key priority of national and London-wide policy. The new Local Plan could continue the strong protection for the historic environment, but there may be an opportunity to provide constructive policy to enable sympathetic development that ensures the continued conservation of heritage assets but also allows for delivery of other Local Plan objectives; this could be informed by existing best practice and guidance, for example, Historic England have a specific advice note<sup>26</sup> which provides guidance on delivering energy efficiency improvements to buildings classed as heritage assets.
- 5.19 The introduction of the agent-of-change principle could be reflected in a local policy, potentially as part of a holistic design policy which considers a range of amenity issues such as noise, disturbance and light pollution.

### **Let us know your thoughts on Design and Conservation policy**

**Q22: Are there any particular design influences, architectural styles or building typologies that you consider to be important in making a positive contribution to the character of specific parts of the borough?**

<sup>26</sup> Historic England, Energy Efficiency and Traditional Homes: Historic England Advice Note 14, available from: <https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/heag295-energy-efficiency-traditional-homes/>

**Q23: Do you feel that the existing protections for Bromley's historic environment are appropriate? Should there be a stronger emphasis on protection of the historic environment, or should there be a more balanced consideration to allow for new development in certain locations?**

**Q24: Do you think the council should identify suitable locations for tall buildings? Are there any areas where you think tall buildings would be suitable or unsuitable?**

**Q25: Do you think that the Local Plan should include specific design codes which set out parameters for development in the borough? If so, are there any particular areas where you feel design codes would be suitable?**

**Q26: Are there any policy areas – e.g. residential use, commercial use, public realm – that you feel could benefit from specific design guidance?**

**Q27: Is there anything else that you feel we need to address through the new Local Plan design and conservation policies?**

# 6. Sustainability and Waste

## What is our current approach?

- 6.1 Chapter 7 of the Local Plan sets out local planning policy on a range of environmental issues including waste management; flood risk management; sustainable design and construction and carbon reduction.
- 6.2 Policy 123 requires applications to demonstrate how the principles of sustainable design and construction have been taken into account as part of the development. Policy 124 refers to London Plan carbon reduction, decentralised energy and renewable energy policies, noting that major developments should aim to reduce their carbon dioxide emissions in accordance with the levels set out in the London Plan. The policy sets out requirements relating to information submitted and specifies that the carbon dioxide reduction target should be met on site unless it can be demonstrated that it is not feasible (in which case any shortfall may be met through an identified project off-site or through a payment in lieu to a local carbon off-setting scheme).
- 6.3 Policy 120 relates to air quality, and requires developments which are likely to have an impact on air quality, or which are located in an area which will expose future occupiers to pollutant concentrations above air quality objective levels, to submit an Air Quality Assessment.
- 6.4 Policies 115 and 116 aim to reduce flood risk, including through the application of the sequential and exception tests to avoid inappropriate development in relation to flood risk. All development proposals should reduce surface water run-off entering the sewerage network reduce rainwater run-off through the use of suitable Sustainable Drainage Systems (SUDS) as far as possible.
- 6.5 Policy 118 concerns contaminated land. Where development of contaminated land, or land suspected of being contaminated, is proposed, details of site investigations and remedial action should be submitted. Land should be remediated to a standard such that there is no appreciable risk to end users or other receptors once the development is complete.
- 6.6 Policies 112 to 114 set out the Council's approach to planning for waste management, including a commitment to meeting waste apportionment targets. Three strategic waste management sites - Waldo Road, Churchfield and Cookham Road – are allocated and safeguarded for waste uses only. New waste management facilities are directed to the SIL in the Cray Business Corridor in the first instance, then other industrial areas, and will only be acceptable where the proposed use does not impede effective operation of other nearby businesses nor undermine the primary function of the designation.
- 6.7 The policies also set out waste management requirements for new developments; major development proposals are required to implement Site Waste Management Plans to reduce waste on site and manage remaining waste sustainably, while all new development is required to include adequate space to support recycling and efficient waste collection.

## What has changed?

- 6.8 As noted in section 2, tackling Climate Change and reducing carbon emissions is an issue of international, national and regional significance. The Climate Change Act has various associated requirements to ensure that progress towards the 2050 Net Zero target is on-track, including five-yearly carbon budgets and a framework for climate change adaptation. The latest relevant UK Climate Change reports include
- The sixth Carbon Budget (December 2020)<sup>27</sup> which seeks reductions in carbon dioxide emissions and encourages of renewable energy generation;
  - The second National Adaptation Programme (NAP) (July 2018)<sup>28</sup> which addresses the risks affecting communities across England and sets out the investment and work to tackle these risks; and
  - The third statutory UK Climate Change Risk Assessment (January 2022)<sup>29</sup>.
- 6.9 The UN Intergovernmental Panel on Climate Change (IPCC), of which the UK Government is a member, published a 'Synthesis Report' in March 2023<sup>30</sup>, drawing together the conclusions of the six previous IPCC reports published since 2018 to create a comprehensive review of the current global knowledge and understanding of the climate.
- 6.10 The Government have published a Net Zero Strategy<sup>31</sup> and a Heat and Buildings Strategy<sup>32</sup> as part a comprehensive plan to enable the transition to clean energy and green technology, and achieve the statutory net zero target by 2050. The Powering Up Britain policy document<sup>33</sup>, published in March 2023, builds on previous strategies and publications and sets out the Government's approach to energy security and net zero. This comprises:
- the Powering Up Britain: Energy Security Plan, which sets out the steps the Government is taking to ensure the UK is more energy independent, secure and resilient, to enable the transformation of the energy system so it is secure, low-cost and low-carbon; and
  - Powering Up Britain: Net Zero Growth Plan, which aims to enhance the UK's energy security, seize the economic opportunities of the transition to Net Zero, and deliver on legal net zero commitments.
- 6.11 The Government have also consulted on the Future Buildings Standard<sup>34</sup> which is intended to deliver homes that are zero-carbon ready and reduce carbon dioxide emissions by 75-80%. A summary of responses to the consultation was published in November 2021, which set out the Government's commitment to a full technical consultation on the Future Buildings Standard in

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<sup>27</sup> Available from: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

<sup>28</sup> Available from: <https://www.gov.uk/government/publications/climate-change-second-national-adaptation-programme-2018-to-2023>

<sup>29</sup> Available from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>

<sup>30</sup> Available from: <https://www.ipcc.ch/report/sixth-assessment-report-cycle/>

<sup>31</sup> Department for Business, Energy and Industrial Strategy, Net Zero Strategy: Build Back Greener (October 2021), available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033990/net-zero-strategy-beis.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

<sup>32</sup> Department for Business, Energy and Industrial Strategy, Heat and Buildings Strategy (October 2021), available from: <https://www.gov.uk/government/publications/heat-and-buildings-strategy>

<sup>33</sup> Department for Energy Security and Net Zero, Powering Up Britain, available from:

<https://www.gov.uk/government/publications/powering-up-britain>

<sup>34</sup> Ministry of Housing, Communities & Local Government, Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for non-domestic buildings and dwellings; and overheating in new residential buildings (January 2021), available from:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/956037/Future\\_Buildings\\_Standard\\_consultation\\_document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956037/Future_Buildings_Standard_consultation_document.pdf)

2023, with a view to implementing the standard in 2025. Interim changes to Part F and Part L of the Building Regulations came into force in June 2022.

6.12 The latest NPPF, published in July 2021, sets out national policy relating to sustainability, including the following new/amended policy:

- Paragraph 153 directs LPAs to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. The new Part O of the Building Regulations, relating to overheating, came into effect in June 2022
- Paragraph 186 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

6.13 The new London Plan is underpinned by Good Growth objective GG6, which, inter alia, seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050; and ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

6.14 Chapter 9 of the new London Plan has introduced a comprehensive suite of sustainable infrastructure policies, including:

- Policy SI 1 (Improving Air Quality), which states that Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality. Development proposals must be at least Air Quality Neutral, and should 'design out' air quality impacts rather than addressing the issue post-design or through retrofitted mitigation measures. Major development must be submitted with an air quality assessment which addresses the policy requirements. Policy SI 1 also identifies Air Quality Focus Areas (AQFAs), locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO<sub>2</sub>) but are also locations with high human exposure. The Bromley Air Quality Management Area (AQMA) was extended in 2020 and now covers most of the north of the borough's urban area. There are also two AQFAs in Bromley<sup>35</sup> – at Croydon Road between Elmers End Green and Croydon Rod Roundabout; and at Tweedy Road / High Street / Widmore Road in Bromley Town Centre.
- Policy SI 2 (Minimising greenhouse gas emissions) requires major development to be net zero-carbon. Major proposals should be accompanied by a detailed energy strategy which sets out how the net zero-carbon target will be met, in line with the energy hierarchy set out in the London Plan. Schemes referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Measures to

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<sup>35</sup> London Atmospheric Emissions Inventory (LAEI) 2016 Air Quality Focus Areas, available from: <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2016-air-quality-focus-areas>

minimise energy demand are prioritised. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall can be provided off-site or via a carbon offset contribution. The London Plan sets out a default price per tonne for offsetting carbon emissions, but notes that Boroughs can develop their own price (subject to evidence).

- Policy SI 4 (Managing heat risk) which requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy.
- Policy SI 7 (Reducing waste and supporting the circular economy) promotes the circular economy, where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. A circular economy approach promotes retention and retrofit of existing buildings over demolition and rebuild. Applications referable to the Mayor should be accompanied by a Circular Economy Statement which sets out how the application will help to achieve circular economy outcomes.
- Policy SI 8 (Waste capacity and net waste self-sufficiency) sets out the target for the equivalent of 100% of London's waste to be managed within London (i.e. net self-sufficiency) by 2026. To achieve this, the policy sets out a range of requirements, including the need to allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste set out for each borough. Boroughs are encouraged to collaborate by pooling their apportionment requirements.

6.15 The GLA have adopted a range of LPGs to support the implementation of the London Plan sustainable infrastructure policies, including the air quality neutral LPG, whole life carbon LPG and circular economy statements LPG<sup>36</sup>. The GLA have also provided detailed energy planning guidance<sup>37</sup> to support planning applicants and local authorities in complying with the Mayor's climate mitigation policies, including guidance on overheating. This guidance was updated in 2022 to account for the changes to Part L of the Building Regulations.

6.16 As noted above, the Council have committed to becoming a 'direct' net zero carbon emission organisation by 2027; the Council produce annual action plans to set out performance against this target<sup>38</sup>. The Bromley Corporate Strategy identifies some specific measures that will help to achieve this, including increased energy efficiency in Council buildings and street lighting. The strategy also states that residents will be encouraged to use renewable and sustainable energy to further reduce borough-wide carbon emissions; and that support and advice will be provided for the installation of equipment for renewable sources, such as solar, wind and ground source heat pump.

6.17 Bromley's Air Quality Action Plan 2020-2025<sup>39</sup> was published in 2020 and sets out actions to tackle the AQMA, as required by the GLA under the London Local Air Quality Management (LLAQM) statutory process.

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<sup>36</sup> LPGs are available from: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

<sup>37</sup> Energy Planning Guidance, available from: <https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/pre-planning-application-meeting-service/energy-planning-guidance>

<sup>38</sup> The latest action plan - Net Zero Action Plan: Annual Performance Report Year 3 - 2021/22 – is available from: <https://www.bromley.gov.uk/downloads/file/2043/net-zero-action-plan-year-3-2021-22>

<sup>39</sup> London Borough of Bromley, Bromley Council Air Quality Action Plan 2020-2025, available from: <https://cds.bromley.gov.uk/documents/s50083227/Exec%20160920%20Air%20Quality%20App%20B.pdf>

## How should the new Local Plan respond to these changes?

- 6.18 Tackling Climate Change and reducing carbon emissions is a key priority at various levels of Government, but a lot of measures fall outside the planning system. Planning can influence sustainable design, which offers numerous holistic benefits that can improve the quality of life for individuals, communities, and the environment by creating healthier, more efficient, and more resilient spaces to live, work, and play in.
- 6.19 The London Plan sets out a range of policies on sustainable infrastructure, which the Local Plan could expand on where there was relevant local evidence (including viability evidence). For example, the Local Plan could introduce more prescriptive requirements requiring developments to meet Building Research Establishment Environmental Assessment Method (BREEAM) standards. BREEAM standards provide a framework for evaluating the environmental, social, and economic sustainability of new and existing buildings. The assessment process evaluates a wide range of factors, including energy and water use, materials and waste management, indoor environmental quality, and the building's impact on the local and wider environment. The new Local Plan could also investigate the potential for a local carbon price to be used when calculating carbon offsetting amounts.
- 6.20 The new Local Plan could also help to maximise sustainability benefits by considering such benefits across various policy areas including design, green infrastructure and transport policy. More detailed information requirements for new development could be considered, to ensure that sustainability has been considered appropriately. This could include support for retrofit of energy efficiency measures in existing buildings, which will help to reduce carbon emissions. Any support for retrofit could include specific criteria relating to the historic environment.
- 6.21 In relation to air quality, the Local Plan will need to reflect the new London Plan and the updated Bromley Air Quality Action Plan, particularly in relation to requirements for air quality assessments and policy on achieving Air Quality Neutral developments.
- 6.22 The new Local Plan can play an important role in implementing the circular economy by encouraging sustainable development that reduces waste and promotes resource efficiency, which could include priority for retrofit first principles.
- 6.23 The adopted Local Plan sets out a broad policy on Decentralised Energy Networks, requiring major development proposals to investigate the potential for connecting to an existing decentralised heat or energy network or developing a new site-wide network. The new Local Plan could provide an opportunity to build on this policy and set out specific requirements, for example in areas where more development is expected to come forward.
- 6.24 The waste policies in the adopted Local Plan are underpinned by an evidence base document prepared in conjunction with other South London boroughs. This evidence base document will need to be updated as part of the Local Plan review, which will inform the approach to waste taken in the new plan. The existing safeguarded waste sites will likely remain given the London Plan policy.

## **Let us know your thoughts on Sustainability and Waste policy**

**Q28: How important do you think it is that the new Local Plan policies support the achievement of Net Zero and measures to tackle climate change?**

**Q29: Do you have any thoughts on local policy approaches that should put in place to deliver sustainability benefits, e.g. specific sustainability standards and design requirements for new buildings; or a locally specific approach to carbon offsetting?**

**Q30: Do you think that the Local Plan should include policies to tackle poor air quality, and if so, what policy measures would you like to see put in place to tackle this issue?**

**Q31: What do you think the Local Plan could do to promote the circular economy?**

**Q32: Is there anything else that you feel we need to address through the new Local Plan sustainability and waste policies?**

# 7. Green Infrastructure, Open Space and Biodiversity

## What is our current approach?

- 7.1 Chapter 5 of the adopted Local Plan sets out a series of policies relating to green infrastructure, open space and biodiversity.
- 7.2 Policies 49 to 53 concern the Green Belt and Metropolitan Open Land (MOL) and adjoining land. These areas are incredibly important as they prevent urban sprawl by maintaining the openness of land. Green Belt and MOL often has a multi-functional role, including green infrastructure and biodiversity benefits.
- 7.3 Inappropriate development in these areas is resisted unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm. Some exceptions apply, including extensions or alterations of a building that do not result in disproportionate additions over and above the size of the original building. Policy 51 sets out a threshold for what constitutes a 'disproportionate addition'.
- 7.4 Policy 55 identifies Urban Open Space (UOS), locally important open spaces to the local communities within the built-up area. The policy sets out specific circumstances where development will be acceptable on UOS.
- 7.5 Policy 56 sets out 25 Local Green Spaces (LGSs) across the borough; these are green or open spaces which has been demonstrated to have special qualities and hold particular significance to the local community which they serve. Development which causes harm to the "special qualities" of a LGS, as defined within its Statement of Significance set out in Appendix 10.8, but is otherwise policy compliant will be considered inappropriate and will not be accepted except in very special circumstances.
- 7.6 Provision of outdoor sport and recreation facilities is supported where specific criteria is addressed, including specific criteria relating to Green Belt and MOL. Loss of sports, recreation and playing fields is resisted unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements.
- 7.7 Policy 59 concerns public open space deficiency, whereby people do not have access to public open spaces of a particular standard. Areas of deficiency are mapped on the Policies Map. The policy states that the Council will seek, where opportunities arise and finance permits, to secure improvements in the amount and distribution of, and access to, open space in areas of deficiency identified by the Council.
- 7.8 Policies 61 to 66 concern agricultural and farming uses, including agricultural dwellings.
- 7.9 Policy 67 relates to minerals workings and associated development. Mineral extraction is an activity that causes considerable disruption and can have widespread effects on local residential and visual amenity, landscapes, nature conservation interests, existing uses, transport networks, and safety. The policy sets out clear requirements that all proposal for mineral extraction will be required to meet.

- 7.10 Policies 68 to 79 set out detailed requirements in relation to biodiversity and nature conservation. Policies 68 and 69 identify various different statutory and non-statutory classifications of nature conservation site:
- Sites of Special Scientific Interest (SSSI) - a statutory designation determined by Natural England as being of national importance by reason of any of their flora, fauna, geology, or physiological features.
  - Local Nature Reserves (LNRs) - a statutory designation for areas with wildlife or geological features that are of special interest locally. Some LNRs are suitable for recreational purposes where managed appropriately.
  - Sites of Importance for Nature Conservation (SINCs) – sites identified through the Local Plan, identified as being of Metropolitan, Borough or Local importance for nature conservation purposes. All SSSI sites of biodiversity interest are included within sites of Metropolitan SINCs.
  - Regionally Important Geological Site (RIG) – RIGs are the most important non-statutory designated sites for geology and geomorphology and represent an important educational, historical and recreational resource; they are the geological equivalent to Metropolitan SINCs.
- 7.11 There are strong policy protections in place to prevent adverse impacts on these sites, and to ensure that appropriate mitigation measures are put in place where a potentially harmful development proposal can demonstrate overriding benefits.
- 7.12 Policy 72 ensures that planning permission will not be granted for development or change of use of land that will have an adverse effect on protected plant and animal species (including badgers, bats, dormice, great crested newts and some species of birds), unless suitable mitigation measures can be secured.
- 7.13 Policies 73 and 74 concern trees. Trees are important features of the Borough's environment and are a valuable resource for wildlife and are strongly protected, with an emphasis on retention and protection of trees as part of any development proposal. Policy 75 covers hedgerows, setting out the important role that they play in softening and screening new developments, in defining boundaries and in protecting the privacy of adjoining properties.
- 7.14 A small portion of the Kent Downs Area of Outstanding Natural Beauty (AONB) lies within Bromley. The AONB is a designation of national importance which recognises the area's unique landscape quality in order to preserve and enhance its characteristic natural features, including flora and fauna, and to maintain its beauty. Policy 76 of the Local Plan seeks to protect, conserve and enhance the AONB and its setting, from development considered to have a detrimental impact on the landscape of the area.
- 7.15 Policy 77 concerns landscape quality and character across the rest of the borough. Bromley has extensive areas of open land in the Borough which have considerable landscape value, principally within the Green Belt but also in some areas of MOL. Development proposals should safeguard the quality and character of the local landscape and seek the appropriate restoration and enhancement of the local landscape.
- 7.16 Policy 79 relates to biodiversity and access to nature, and seeks opportunities to improve access to wildlife sites in areas which are currently deficient in access. The Policies Map identifies these deficiency areas, which cover areas more than 1km walking distance from Metropolitan and Borough-grade SINCs.

## What has changed?

- 7.17 The Bromley Corporate Strategy sets out the Council’s ambition for residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future, to be delivered through various measures including continued protection and enhancement of green belt land and the implementation of tree planting programmes.
- 7.18 The Council has published an Open Space Strategy<sup>40</sup> which sets out a vision for “*an open space portfolio that promotes the environmental, social and economic wellbeing of the borough, allowing our residents, communities and wildlife to thrive five strategy objectives*”. The strategy sets out five objectives to help deliver this vision, including ensuring the continued protection of Bromley’s diverse natural habitats, its biodiversity and its cultural and historical assets.
- 7.19 A new Bromley Biodiversity Plan<sup>41</sup> was published in 2021. The document details the priority habitats and species in the borough and through providing information and guidance on best practice for biodiversity in Bromley aims to improve biodiversity at a local level. The document provides further guidance in support of the Local Plan and can be a material consideration when considering planning applications.
- 7.20 The Environment Act 2021 set legally binding targets for biodiversity and the requirement to produce Local Nature Recovery Strategies. Developments will be required by law to provide a minimum 10% biodiversity net gain, measured using a biodiversity metric set out by the Department for Environment, Food and Rural Affairs (DEFRA); and enter into Conservation Covenants to secure long-term (30 year) biodiversity gain.
- 7.21 NPPF Green Belt policy remains unchanged, but the DLUHC have consulted on proposed changes which would make it clear that LPAs are not required to review and alter Green Belt boundaries if this would be the only way of meeting housing need in full.
- 7.22 Chapter 8 of the new London Plan sets out policies for green infrastructure and the natural environment, including the following:
- Policy G1 (Green infrastructure) aims to ensure that London’s network of green and open spaces, and green features in the built environment are protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network.
  - London Plan policies SI 14 to SI 17 concern waterways, which come under the definition of green infrastructure. Policy SI 14 states that Development Plans and development proposals should address the strategic importance of London’s network of linked waterways, and should seek to maximise their multifunctional social, economic and environmental benefits. Policy SI 17 states that Development Plans should support river restoration and biodiversity improvements.
  - Policy G4 (Open space) requires Development Plans to undertake a needs assessment of all open space to inform policy and include appropriate designations and policies for the protection of open space to meet needs and address open space deficiencies. Development proposals should not result in the loss of protected open space and where possible create areas of publicly accessible open space, particularly in areas of deficiency.

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<sup>40</sup> Bromley Open Spaces Strategy for 2021 to 2031, available from:  
<https://www.bromley.gov.uk/downloads/download/423/open-space-strategy>

<sup>41</sup> Bromley Biodiversity Plan 2021-2026, available from:  
<https://www.bromley.gov.uk/downloads/file/639/bromley-biodiversity-plan>

- Policy G5 (Urban greening) requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The London Plan sets out default target scores for UGF but encourages boroughs to develop their own UGF target scores based on local circumstances.
- Policy G6 (Biodiversity and access to nature) requires SINC<sup>s</sup> to be identified (using up-to-date information) and afforded a level of protection commensurate with their status and the contribution they make to wider ecological networks. Where harm to SINC<sup>s</sup> is unavoidable (as a result of a development proposal), and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the London Plan policy sets out a mitigation hierarchy which should be applied to minimise impacts: The policy also states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.
- Policy G7 (Trees and Woodlands) aims to protect and maintain London's urban forest and woodlands and encourages planting of new trees and woodlands in appropriate locations in order to increase the extent of London's urban forest (i.e. the area of London under the canopy of trees). Boroughs should protect 'veteran' trees and ancient woodland where these are not already part of a protected site; and identify opportunities for tree planting in strategic locations. Development proposals should ensure that, wherever possible, existing trees of value are retained. Removed trees should be adequately replaced based on the existing value of the benefits of the trees removed, using the CAVAT or itree valuation system.

7.23 London Plan policy G2 reflects the NPPF and provides strong protection for London's Green Belt. Policy G3 affords the same strong protection for MOL.

7.24 The GLA have adopted several LPGs<sup>42</sup> relating to green infrastructure and the natural environment, including the urban greening factor LPG which provides guidance to help assess UGF as part of development proposals and to develop local UGF targets as part of the Local Plan process.

## How should the new Local Plan respond to these changes?

7.25 Green infrastructure and biodiversity have become increasingly important national and regional planning issues following the introduction of the Environment Act and the adoption of the new London Plan. The Local Plan offers an opportunity to reflect the importance of green infrastructure and biodiversity at a local level, in order to protect important natural resources. This could also include promotion of biodiversity as part of new developments, to encourage new habitats and greening.

7.26 As noted above, the Green Belt and MOL continues to be strongly protected in national and regional policy, with emerging national policy proposing further protections to reduce the risk of harmful loss of Green Belt. LPAs will have greater control over Green Belt and MOL boundaries. The strong emphasis on protecting Green Belt and MOL as set out national and regional policy will be a key consideration when preparing the Bromley Local Plan.

7.27 The local UOS designation remains important as these sites provide valuable open spaces for local communities. The existing UOS boundaries have remained largely unchanged for a

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<sup>42</sup> LPGs are available from: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63506>

number of years. The Local Plan review provides an opportunity to review UOS boundaries, to provide up-to-date strengthened evidence to justify continued protection, and to identify potential opportunities to refine boundaries where site circumstances have changed, for example as a result of development.

- 7.28 The Local Plan will need to reflect the legal requirement to provide for biodiversity net gain. This could include a locally specific net gain percentage, dependent on evidence; any local percentage could be tailored dependent on site location or site size. The production of a Local Nature Recovery Strategy may need to be taken into account as part of the Local Plan review; it is expected that a London-wide strategy will be prepared.
- 7.29 There is potential to investigate the designation of new or re-graded SINC sites through the new Local Plan, pending up-to-date site assessments to determine their biodiversity value. Updated deficiency open space and access to nature deficiency mapping will also be needed to support new Local Plan policies.
- 7.30 There may be opportunity to put in place a locally specific UGF target score, either across the borough or targeted to specific areas, e.g. areas with a deficiency in green infrastructure. A local approach to UGF would need to be evidenced, potentially including viability evidence.

### **Let us know your thoughts on Green Infrastructure, Open Space and Biodiversity policy**

**Q33: Do you agree that the Green Belt and Metropolitan Open Land should continue to be strongly protected? If not, why do you think protections should be relaxed, e.g. to facilitate new housing and employment uses, or to meet other development needs?**

**Q34: Should the new Local Plan include local target for Biodiversity Net Gain? If yes, do you have any thoughts on how such a policy would operate, in terms of the specific percentage of net gain required and/or whether the policy would be tailored based on the type of development?**

**Q35: Should the new Local Plan introduce a locally specific urban greening factor score? If yes, do you think this should apply borough-wide or are there particular areas where it should be targeted?**

**Q36: Are there any specific species and habitat targets or developer requirements that should be included in the new Local Plan?**

**Q37: Is there anything else that you feel we need to address through the new Local Plan green infrastructure, open space and biodiversity policies?**

# 8. Social and strategic infrastructure

## What is our current approach?

- 8.1 The Local Plan has a number of policies covering various types of social and strategic infrastructure.
- 8.2 Policies 20 to 22 concern social infrastructure in broad terms, aiming to ensure the provision, enhancement and retention of appropriate social infrastructure, broadly defined as “*the provision of facilities for the community, including health, educational, social, recreational, leisure, community safety, spiritual and cultural facilities.*”
- 8.3 Opportunities for the enhancement or the creation of social infrastructure, to address the needs of existing and future residents of all ages. New developments will be expected to provide social infrastructure appropriate to the nature and scale of the proposal.
- 8.4 Development which meets an identified need for social infrastructure should be accessible by a full range of transport modes. Planning permission will not be granted for proposals that would lead to the loss of social infrastructure, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves, or it can be demonstrated that there is no longer a need for this or other forms of social infrastructure.
- 8.5 Policy 26 relates to health and wellbeing. Planning applications are required to maximise opportunities to support and enhance health and wellbeing. Extensions to existing facilities and new or improved health facilities will be allowed, provided that they are easily accessible by public transport or are located within existing shopping centres or local parades, unless there are demonstrably negative local impacts which substantially outweigh the need, which cannot be addressed through planning conditions or obligations. Health contributions will also be secured through planning obligations where appropriate alongside other suitable funding mechanisms to support the delivery of health infrastructure, facilities and services to meet needs generated by development and mitigate the impact of development.
- 8.6 Policies 27 to 29 concern education uses. A number of education sites are allocated (at Appendix 10.4) to meet projected education need over the Local Plan period. Proposals for new educational facilities (including extensions to existing schools) which meet local need will be supported, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure. Such proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. Suitability will also be dependent on consistency with other policies including transport, open space and conservation policies. New education facilities should be designed sensitively, to minimise footprint and the impact on open space. Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.
- 8.7 Policy 24 safeguards existing allotments and notes that opportunities for new allotments will be explored. Development of allotment sites will only be considered where appropriate re-provision of plots is made in accessible locations.
- 8.8 There are eight cemeteries across the Borough, six of which are owned by the Council and managed by contractors. Policy 25 safeguards existing burial space and states that the

Council will explore opportunities for further burial sites should pressure for places increase over the plan period.

- 8.9 The Local Plan includes several strategic (or 'hard') infrastructure policies, relating to issues such as waste, utilities and transport schemes. Policy 125 (Delivery and implementation of the Local Plan) is an overarching policy which sets out how the Council will work with partners to deliver the vision, objectives and policies of the Local Plan. Developments will be required to provide for the infrastructure, facilities, amenities and other planning benefits that are necessary to support and serve it.
- 8.10 Policy 35 sets out the Council's transport investment priorities, noting the aim to work with and lobby partner agencies including Transport for London (TfL), Network Rail and the Department for Transport (DfT) to secure investment in transport infrastructure for the benefits of the Borough, such as increasing capacity, reducing congestion, and making improvements to public transport. Policy 36 safeguards land for various transport improvement schemes to tackle existing congestion issues and facilitate new development.
- 8.11 Policy 89 concerns telecommunications development and applies to various types of commercial telecommunications apparatus including purpose built masts, cellular radio antennae, terrestrial microwave antennae and satellite antennae or dishes. The policy sets out criteria to assess telecommunications development.
- 8.12 Policy 117 seeks to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. Where there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements that will be completed prior to occupation of the development.

## What has changed?

- 8.13 Bromley adopted a Community Infrastructure Levy (CIL) charging schedule on 19 April 2021, with the charging schedule taking effect from 15 June 2021. CIL provides financial contributions from certain types of development to help fund new or improved strategic infrastructure required to support the growth identified in the Local Plan.
- 8.14 An updated Planning Obligations SPD was adopted in June 2022. The SPD provides guidance on the council's general approach to planning obligations, and where relevant, sets out the requirements and mechanisms for securing contributions.
- 8.15 The Local Implementation Plan (LIP) is a statutory document, required by the Greater London Authority Act 1999, which sets out how Bromley intends to implement the Mayor of London's Transport Strategy within the borough. Bromley's third LIP<sup>43</sup> (LIP3) was approved by the Mayor of London in April 2019. LIP3 sets out the borough's approach to transport including the ambition to improve road safety, along with various investment priorities for the next three years as well as in the longer term to 2041.
- 8.16 The Bromley Corporate Strategy aims to facilitate the development of digital infrastructure in the borough, which will be critical to support the local economy strategy to meet the growing digital needs of businesses and homes, through our Digital Infrastructure Work Plan.

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<sup>43</sup> Bromley's Third Local Implementation Plan 2019, available from:  
<https://www.bromley.gov.uk/downloads/file/1177/local-implementation-plan-lip3->

- 8.17 Chapter 5 of the new London Plan relates to social infrastructure. Policy D1 states that, when preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. Co-location of different forms of social infrastructure and the rationalisation or sharing of facilities is encouraged. Development proposals that would result in a loss of social infrastructure in an area of defined need should only be permitted where there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or; the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
- 8.18 Policy S2 concerns health and social care facilities. Boroughs should work with relevant stakeholders to identify and address local health and social care needs in the Development Plan. Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported. New facilities should be easily accessible by public transport, cycling and walking.
- 8.19 Policy S3 focuses on education and childcare facilities. To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Where necessary, sites should be identified for education provision. The policy sets out criteria to assess development proposals for education and childcare facilities.
- 8.20 Policy S4 sets out requirements for play and informal recreation space. Boroughs should identify need for children and young person's play and informal recreation facilities, and set out policies to address any identified need. Criteria is set out for development proposals, with a requirement of at least 10 square metres of playspace per child for residential developments.
- 8.21 Policy S5 concerns sports and recreation facilities, requiring boroughs to ensure there is sufficient supply of good quality sports and recreation facilities by identifying the need for new facilities through the preparation of Development Plans; and through strong protection of existing facilities when assessing development proposals.
- 8.22 Policy S6 requires large-scale developments and large areas of public realm, to provide and secure the future management of free publicly accessible toilets suitable for a range of users; and free 'Changing Places' toilets.
- 8.23 Policy S7 requires boroughs to ensure provision is made for the different burial needs and requirements of London's communities when preparing Development Plans, informed by a needs assessment. The policy supports proposals for new burial provision and resists loss of such space unless it can be proven that there is no ongoing or future demand.
- 8.24 The new London Plan policy DF1 states that development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the London Plan.
- 8.25 Policy SI 5 states that development proposals should seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided.

- 8.26 Policy SI 6 sets out that Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.
- 8.27 Policy T3 states that Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections. This includes identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling. Table 10.1 of the London Plan sets out various transport schemes that should be appropriately safeguarded.
- 8.28 Policy T9 notes that Mayoral CIL will secure funding towards transport infrastructure of strategic importance; and states that boroughs – in consultation with the Mayor - should identify a package of other strategically-important transport infrastructure, as well as improvements to public realm, along with other funding streams to deliver them. Planning obligations, including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.

## **How should the new Local Plan respond to these changes?**

- 8.29 Ensuring appropriate provision of social and strategic infrastructure is integral to achieving sustainable development and ensuring that the borough can accommodate an expanding population and increased development.
- 8.30 Updated evidence covering different types of social and strategic infrastructure will be necessary to inform the preparation of new Local Plan policies, in particular determining the need for new infrastructure and any specific locations where this may be required. This could include consideration of co-location of different infrastructure uses where feasible. Where appropriate, the new Local Plan could also set out specific requirements for certain types of infrastructure, for example, in relation to detailed design and siting.
- 8.31 The new Local Plan will also set out any types of infrastructure which may require specific protection.
- 8.32 Required evidence will include an update of the Infrastructure Delivery Plan<sup>44</sup> (IDP) which reviews and outlines the infrastructure needed to support the growth and objectives reflected in the Local Plan. This would include consideration of any new infrastructure priorities including the ambition to deliver improved digital infrastructure as set out in the Bromley Corporate Strategy and the London Plan.
- 8.33 The introduction of the Bromley CIL means that contributions toward infrastructure through S106 will generally not be sought on a case-by-case basis, although there may be site-specific circumstances that warrant provision of infrastructure as part of an individual planning application, either through direct physical provision on-site or through a contribution to deliver infrastructure improvements off-site. As noted above, the Planning Obligations SPD sets out

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<sup>44</sup> The latest IDP was published in September 2020 to support the adoption of the CIL charging schedule and is available from: <https://www.bromley.gov.uk/downloads/file/698/london-borough-of-bromley-infrastructure-delivery-plan>

guidance on when planning obligations may be sought; the SPD will continue to be of relevance following the adoption of a new Local Plan but may require updating to reflect new policy requirements.

## **Let us know your thoughts on Social and Strategic Infrastructure policy**

**Q38: What do you consider to be the key infrastructure challenges and opportunities for the borough over the proposed plan period?**

**Q39: Are there any areas in the borough that you think are currently deficient with regard to certain types of infrastructure?**

**Q40: Are there any specific policy requirements for new infrastructure that should be put in place, e.g. in relation to the design and siting of certain types of infrastructure?**

**Q41: Is there anything else that you feel we need to address through the new Local Plan social and strategic infrastructure policies?**

# 9. Transport and public realm

## What is our current approach?

- 9.1 The Local Plan sets out various transport policies to deliver plan objectives relating to reducing congestion, encouraging patterns of development that reduce the need to travel, supporting improved public transport and facilitating environments that encourage walking and cycling.
- 9.2 Policy 30 sets out requirements for provision of off-street parking as part of new developments, with specific minimum and maximum parking standards per housing unit, based on relevant PTAL levels. Parking for all other types of development is to be provided at levels set out in London Plan<sup>45</sup>, as are requirements for blue badge parking and cycle parking.
- 9.3 The policy also requires provision of electric vehicle charging points and, where appropriate, car club spaces. For development where servicing problems may arise, off-street/rear servicing facilities are normally required.
- 9.4 Policy 31 directs any new development likely to be a significant generator of travel to locations accessible or capable of being made accessible by a range of transport modes, including public transport, walking and cycling. The policy sets out information requirements including the need to submit, where necessary, a transport assessment, travel plan, construction logistics plan, and/or delivery and servicing plan.
- 9.5 Policy 32 states that the Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected.
- 9.6 Policy 33 concerns accessibility and seeks to promote ease of access to all parts of the borough and all new development by ensuring that the design of road alterations and public realm improvements. The policy also states that provision or contribution to suitable infrastructure improvements may be required as part of development proposals.
- 9.7 Policy 34 sets out policy on highway infrastructure, including criteria to assess proposals for new vehicle accesses and new or extended vehicle crossings.

## What has changed?

- 9.8 The Bromley Corporate Strategy aims to continue managing Bromley's extensive road network effectively and efficiently, keeping roads safe and implementing strategies to improve parking in the borough, including the addition of electric charging spaces. The document also highlights the importance of working with transport providers to maximise public transport usage and connectivity for Bromley residents and working effectively with TfL to keep the Bromley road network well maintained and with utility providers to make sure that all operations, improvements and servicing of their infrastructure are fit for purpose while causing the least disruption to residents.

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<sup>45</sup> Policy 30 refers to the London Plan 2016, which was the extant version at the time the Local Plan was prepared and adopted. The 2016 London Plan has been superseded by the 2021 London Plan.

- 9.9 The strategy also encourages more sustainable forms of travel, including hybrid and electric vehicles, cycling, walking and delivering the longest electric bus route in London.
- 9.10 As noted in paragraph 8.15, Bromley's third LIP (LIP3) was approved by the Mayor of London in April 2019. LIP3 sets out the borough's approach to transport including the ambition to improve road safety, along with various investment priorities for the next three years as well as in the longer term to 2041
- 9.11 Chapter 10 of the new London Plan relates to transport. Policy T1 sets out the strategic approach to transport, stating that Development Plans should support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041; and the proposed transport schemes set out in Table 10.1 of the London Plan, which includes a variety of projects across different transport modes and in relation to the public realm. Figure 10.1 of the London Plan sets out the expected modal shift for Central, Inner and Outer London, which would collectively achieve the 80% London-wide target – Outer London is expected to achieve a modal shift from 60% (in 2015) to 75% (in 2041).
- 9.12 The Mayor's Transport Strategy<sup>46</sup> provides more detail on the holistic approach that needs to be taken by all stakeholders to achieve the London Plan strategic policy aims.
- 9.13 Policy H2 introduced the Healthy Streets approach, an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling; and promote and demonstrate application of the Healthy Streets approach. In Opportunity Areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport.
- 9.14 Policy T3 concerns transport capacity, connectivity and safeguarding, and directs Development Plans to develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections. This is to be achieved through safeguarding existing land and buildings used for public transport, active travel or related support functions; and identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing.
- 9.15 The GLA have adopted the Sustainable Transport, Walking and Cycling LPG<sup>47</sup> which provides guidance to assist with the implementation of policies T1, T2 and T3, to ensure walking and cycling is supported and the Mayor's Healthy Streets approach is implemented; to identify land requirements that will support enhanced public transport connectivity and capacity as part of the Local Plan process; and to support the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041.
- 9.16 Policy T4 sets out requirements for transport assessments/statements as part of development proposals, to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Where impacts are identified, these should be appropriately mitigated including through the provision of new transport infrastructure where necessary. Requirements for

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<sup>46</sup> Available from: <https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy>

<sup>47</sup> LPG is available from: <https://www.london.gov.uk/sites/default/files/2022-12/A%20Sustainable%20Transport%20Walking%20and%20Cycling%20LPG.pdf>

Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans are also set out with reference to TfL guidance.

- 9.17 Policy T5 states that Development Plans should help remove barriers to cycling and create a healthy environment in which people choose to cycle; this includes the need to provide appropriate levels of cycle parking in accordance with standards set out in the London Plan, and designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 9.18 Policy T6 concerns car parking, stating that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with policy requirements.
- 9.19 The policy states that maximum car parking standards should be applied to development proposals and used to set local standards within Development Plans. Parking policy (including specific maximum standards) for residential, office, retail, and hotel and leisure uses are set out in policies T6.1, T6.2, T6.3 and T6.4 respectively. Policy T6 does allow Outer London boroughs to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards) but can only be for PTAL 0-1 areas. In addition, Policy T6.1, Table 10.3 states that Boroughs should consider standards that allow for higher levels of parking provision for 3-bed (and larger) residential units in PTAL 0-1 areas, where there is clear evidence that this would support additional family housing. A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to TfL guidance on parking management and parking design.
- 9.20 Policy T6.1 sets out disabled person parking requirements for new residential developments. The policy requires major residential developments to ensure that for 3% of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset, and demonstrate, as part of the Parking Design and Management Plan, how an additional 7% of dwellings could be provided in future, where necessary. The policy also sets out criteria for the design and operation of disabled persons parking bays.
- 9.21 Policy T6.5 and Table 10.6 set out requirements for non-residential disabled persons parking, including specific standards for different types of use.
- 9.22 Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles, according to use-specific policy set out in policies T6.1 to T6.4.
- 9.23 Policy T7 concerns deliveries, servicing and construction, setting out a number of requirements with the aim to facilitate sustainable freight movement by rail, waterways and road. The policy states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with TfL guidance and in a way which reflects the scale and complexities of developments. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips.
- 9.24 Policy D8 sets out detailed policy requirements relating to the public realm. Development Plans and development proposals should encourage and explore opportunities to create new

public realm where appropriate; and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.

- 9.25 New or improved public realm should be based on an understanding of how the public realm in an area will function and create a sense of place during different times of the day and night, days of the week and times of the year. Appropriate management and maintenance arrangements should be put in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter. The Public London Charter LPG<sup>48</sup> provides further guidance on how this requirement can be addressed.
- 9.26 Policy T8 concerns aviation, supporting the role of the airports serving London in enhancing the city's spatial growth, particularly within Opportunity Areas well connected to airports by public transport and which can accommodate significant numbers of new homes and jobs. However, the policy states that the environmental and health impacts of aviation must be fully acknowledged, and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change.
- 9.27 Development proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Development proposals should make better use of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.
- 9.28 The policy states that airport operators should work closely with airlines, TfL and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff make by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.
- 9.29 Development proposals relating to general and business aviation activity should only be supported if they would not lead to additional environmental harm or negative effects on health, or impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example, the introduction of scheduled flights at airports not generally offering such flights – should be refused.

## **How should the new Local Plan respond to these changes?**

- 9.30 Ensuring connectivity via a range of transport modes is integral to ensuring sustainable development in Bromley, to deliver social, economic and environmental benefits. While a lot of the borough is accessible by a range of modes, including sustainable transport, parts of the borough are not accessible and remain reliant on car use.
- 9.31 As discussed in section 2 with regard to the spatial strategy of the new Local Plan, paragraph 105 of the NPPF states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Therefore, there are likely to be large parts of the borough where larger-scale development will not be suitable, because of poor accessibility by a range of transport modes.

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<sup>48</sup> LPG is available from: [https://www.london.gov.uk/sites/default/files/public\\_london\\_charter\\_lpg.pdf](https://www.london.gov.uk/sites/default/files/public_london_charter_lpg.pdf)

- 9.32 The London Plan policies limit the scope for bespoke parking standards, but there may be potential to investigate Bromley-specific minimum parking standards (within the maximum standards) for any development that does come forward in low PTAL areas (0-1). There may also be potential to investigate a locally specific policy to set out higher requirements for electric vehicle charging points.
- 9.33 Other requirements such as car club spaces could be strengthened to mitigate any impacts that may arise due to reduced parking standards.
- 9.34 Building on the London Plan public realm policy, the Local Plan could set out local requirements for the public realm. This could include specific design requirements for new public realm, setting out specific features that should be provided. Features which provide multi-functional benefits could be prioritised, for example, green space or playable features that encourage use by children and families.

### **Let us know your thoughts on Transport and Public Realm policy**

**Q42: What do you think are the key challenges in relation to promoting sustainable transport in the borough? What could the Local Plan do to facilitate increased levels of sustainable transport use?**

**Q43: Should the new Local Plan have a strong emphasis on the provision of high quality public realm? Are there any particular features that new or improved public realm should include?**

**Q44: Is there anything else that you feel we need to address through the new Local Plan transport and public realm policies?**

# 10. Site allocations

## What is our current approach?

- 10.1 Site allocations identify land to be developed for a type or mix and amount of uses to meet objectively assessed need and the borough's economic, environmental and social objectives.
- 10.2 The adopted Local Plan includes site allocations for housing, travellers sites, education uses and waste sites. The allocations identify the site boundary and include some information on the scope of the development expected to occur on the sites. The housing sites set out information on the number of residential units expected to be delivered, principally informed by the broad density matrix from the old London Plan (pre-2021).
- 10.3 Some housing allocations also set out potential other supporting uses to be provided, for example, office or retail uses. The housing allocations also project when, in the Local Plan period, the sites will be delivered, i.e. years 1-5, 6-10 or 11-15.

## What has changed?

- 10.4 As noted in section 3, Policy D3 of the new London Plan replaced the density matrix approach, which set out a range of suitable housing densities, with a design-led approach, which requires all development to make the best use of land to ensure that site capacities are optimised. This applies to formulating site allocations.
- 10.5 Policy D3 and the Optimising Site Capacity: A design-led approach LPG<sup>49</sup> set out requirements and guidance to inform the identification of site capacities. Where development parameters for allocated sites have been set out in a Development Plan, the London Plan states that development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.
- 10.6 Paragraph 122 of the NPPF expands on previous national policy regarding site allocations, stating that where the LPA considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan, it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped).

## How should the new Local Plan respond to these changes?

- 10.7 Site allocations provide an opportunity to assist the delivery of Local Plan objectives and help to address various development needs. The new Local Plan could set out a range of allocations for housing (including traveller sites), employment and other uses, where updated evidence suggests there is need for such uses. This could include re-allocation of existing site allocations where appropriate.
- 10.8 Where site allocations are set out, the London Plan design-led approach would apply. New allocations would be expected to provide more specific guidance and parameters to guide

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<sup>49</sup> LPG available from: [https://www.london.gov.uk/sites/default/files/optimising\\_site\\_capacity\\_-\\_a\\_design-led\\_approach\\_-\\_publish\\_for\\_consultation.pdf](https://www.london.gov.uk/sites/default/files/optimising_site_capacity_-_a_design-led_approach_-_publish_for_consultation.pdf)

development that comes forward on these sites; this could include design guidance relating to suitable height. Capacity assumptions related to each site should be informed by detailed site assessments, which would provide a more realistic estimate of capacity compared with the density matrix approach which informed the adopted Local Plan.

- 10.9 As set out in section 1, the Council undertook a call for sites consultation exercise between August and November 2021. As part of this exercise landowners, developers and other interested parties were invited to put forward potential development sites for allocation, for development of housing, employment and retail uses or any other uses.
- 10.10 Submissions received as part of this earlier consultation exercise will be considered as part of the new Local Plan preparation and **resubmission of representations is not necessary**. Where there are changes to a previously submitted site, e.g. changes to site boundaries or land uses sought, additional information could be submitted to supplement previous submissions, rather than fully resubmitting previous representations. As part of this 'Issues and Options' consultation, the Council welcomes submission of additional sites not previously submitted.
- 10.11 Where a new or amended site is submitted for consideration, submissions should be accompanied by GIS shapefiles detailing the site boundaries. Shapefiles should be in ESRI format. Submission of proportionate information setting out justification for the proposed allocation of the site is encouraged. This information will assist with the council's assessment of potential new site allocations. Submissions should be made in the same way as other comments, as set out in section 1, paragraph 1.21 of the document.
- 10.12 There is no guarantee that sites submitted as part of this consultation exercise will be allocated; all sites will be subject to detailed assessment against relevant legislation and guidance as part of the Local Plan preparation process. Where sites are considered to warrant allocation, these will be included in a future consultation exercise.

## **Let us know your thoughts on Site Allocations**

**Q45: What parameters do you think should be specified as part of any new site allocations?**

**Q46: Are there any particular development needs that should be addressed through site allocations, e.g. housing, employment social infrastructure?**

**Q47: Is there anything else that you feel we need to address through the new Local Plan site allocations?**