



Orpington Town Centre Supplementary Planning Document

Regulation 12(a) Consultation Statement

June 2023

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1 Introduction

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

2 Preliminary consultation information

- 2.1 From 15 July 2020 to 5 October 2020, the Council launched a consultation¹ using Commonplace, an online consultation portal. Commonplace allowed respondents to provide comments in response to specific themes and allowed comments to be submitted via a mapping tool (including the ability to pin comments to specific areas on the map).
- 2.2 Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
- 2.3 The consultation sought views from a broad range of individuals and organisations on how the Council should guide the development of Orpington Town Centre. The link to the preliminary consultation can be found here.
- 2.4 187 representations were received; 172 were received online through the Commonplace portal, and 15 were received by email/post.
- 2.5 Public consultation is not a statutory requirement during the preliminary stages of drafting an SPD. However, public consultation at an early stage ensures key issues can be identified and reflected in the drafting of the SPD where appropriate.
- 2.6 The Commonplace consultation sought views on the following 10 themes, asking a range of specific questions on these themes:
 - The future of Orpington
 - Housing
 - Transport and infrastructure
 - Offices
 - Retail, culture and leisure
 - Public realm, permeability and connectivity
 - Historic environment
 - Green infrastructure
 - Environment and air quality
 - Development opportunities
- 2.7 The Commonplace portal also provided the opportunity to make general comments (i.e. not in relation to a specific theme). The mapping portal allowed comments to be made in relation to specific points on a map of Orpington, and for others to agree with comments made. Whilst some use was made of the map and the 'agree' feature, the majority of respondents made their own comments under the various theme headings.
- 2.8 Several representations were also received in traditional letter/email format, chiefly from organisations and bodies.

¹ Orpington Town Centre SPD, Commonplace webpage, available from: <https://orpingtontowncentre.commonplace.is/>; and <https://orpingtontowncentremap.commonplace.is/>

2.9 Of the online responses (excluding the broad responses under ‘General Comments’ and ‘The future of Orpington Town Centre’) the ‘Environment and Air Quality’ theme received the most representations.

Table 1: Response rate to Commonplace consultation, by theme

Specific Topic	Responses	% of Responses
Environment and air quality	23	19
Transport and infrastructure	20	16
Green infrastructure	19	15
Housing	15	12
Retail, culture and leisure	13	11
Development opportunities	11	9
Historic environment	10	8
Public realm, permeability and connectivity	8	6
Offices	5	4
Total	124	100

3 Preliminary consultation responses

- 3.1 This section sets out the key headlines of the responses received as part of the preliminary consultation between July and October 2020, including details of common issues raised. More detailed summaries of the representations are provided in the appendices.

General comments

- 3.2 Responses sought guidance within the SPD to enable future developments to be flexible and adaptable. Comments highlighted that future developments should be resilient to changing circumstances but also able to respond to and support change, whilst character and local distinctiveness should be enhanced. There was a strong view that the SPD should support a reduction in carbon emissions, promote active travel and protect natural resources with the benefits of increased walkers, residents and cyclists within the town centre to the local economy and town centre viability recognised. Brownfield sites were noted as being opportunities for future development with the SPD providing clarity over the scale and nature of redevelopment.

The future of Orpington Town Centre

- 3.3 Numerous representations under this heading were also covered in more detail in the particular themes.
- 3.4 The importance of flexibility was highlighted to ensure that town centre uses can adapt and thrive, with mixed retail, culture and leisure/public realm flagged as core functions of the town centre. The importance of outdoor space was particularly highlighted in the comments, in particular functional and enjoyable civic spaces. Community spaces and activities should be prioritised. The town centre should be accessible and safe for all and various suggestions were made to improve social interaction and sense of community including a range of events and market activities
- 3.5 The complete or partial pedestrianisation of the High Street came through as a strong theme with increased opportunities for safer walking/cycling and better permeability.
- 3.6 Representations suggested that the area around the market square should be identified for tall buildings; however, comments also noted that development should be low rise and human scale and that new residential properties should be affordable and not just investments.
- 3.7 The contribution of the night-time economy and residential development to the vibrancy of the town centre during day and night was recognised and expansion suggested. Comments also noted the potential for shared workspaces.
- 3.8 The importance of green infrastructure was raised in several comments and this was seen as key to the town's reputation.

Housing

- 3.9 It was suggested that the SPD should increase housing density within town centre envelope with design guidance identifying potential sites for improvement or redevelopment. Responses

noted the opportunity to provide different housing typologies, contribute to the boroughs housing targets and reduce pressure on the Green Belt, whilst increasing footfall to the town centre, and supporting local businesses. The Walnuts redevelopment was specifically highlighted.

- 3.10 New homes should meet or exceed residential standards and create high quality accommodation. The greatest preference was for 2 bed units with a strong emphasis on affordability with buy to let discouraged.
- 3.11 The importance of supporting infrastructure for new homes was highlighted, notably transport and community infrastructure (e.g. health provision)

Transport and infrastructure

- 3.12 There was a general support and encouragement within the comments for a reduction in cars within the town centre, with considerable reference to pedestrianisation opportunities and alternative uses of current road space, whilst acknowledging the importance of addressing the needs of those with limited mobility.
- 3.13 The need for an increase in active travel and improvements in public transport was linked strongly with the view that a holistic transition to active travel and public transport would present both environmental, health, social and economic benefits. References were made to the adoption of Healthy Streets principles, creating space for safe active travel and high-quality public realm for walking and cycling.

Offices

- 3.14 Comments suggested building of new offices should be delayed, noting the changes in working patterns related to the pandemic.
- 3.15 There was a strong emphasis on the need for buildings to be multi-use/flexible to accommodate future ways of working.
- 3.16 Generally, the view was that the conversion of offices to residential use should be restricted.

Retail, culture and leisure

- 3.17 There was strong support for the Town Centre to diversify to respond to changes in the retail environment, as such there should be a strong focus on leisure and cultural facilities and existing facilities should be strengthened. Small and independent operators and meanwhile/temporary uses should also be supported. There was support for the town centre to become a recognised environmental leader.
- 3.18 Developments should deliver and support new spaces for socialising and have regard to Sport England's Active Design Guidance. Trees and hedging should be increased. There was also support for space to enable events, markets, play areas for children, dog free areas and spill out areas and a range of indoor event facilities were suggested – including possible integration with the library or redeveloped leisure centre.
- 3.19 Redevelopment potential, including mixed education and residential redevelopment of Orpington College, was suggested.
- 3.20 Complete or partial pedestrianisation of the High Street was again suggested with parking/drop off allowed for people with particular needs such as the disabled and elderly.

Public Realm, permeability and connectivity

- 3.21 Responses suggested that the SPD should acknowledge the importance of the public realm which adds economic value and distinctiveness, supports active travel and health, and support improved connectivity / permeability between the town centre and station.
- 3.22 Comments included suggestions for public realm improvement such as pedestrianisation, links to parks, walking and cycling routes to the town centre, an increase in outdoor sheltered spaces, more place to sit and meet, remove barriers and provide step free access.
- 3.23 There was strong support for the Market Square to be enhanced and promoted as a community hub, for community activity, congregation and engagement

Historic Environment

- 3.24 Respondents considered that the SPD should acknowledge the benefits of the historic environment, including the economic and cultural benefits of the Priory Conservation Area and the Listed Priory, and to ensure the effective management and protection of the historic environment.
- 3.25 Whilst there was some support for high density development, it was emphasised that this should be of high-quality design, informed by context, and that potential tall buildings should be managed in relation to heritage assets and their setting.

Green infrastructure

- 3.26 The importance of green infrastructure was highlighted throughout the responses and not just confined to responses to this theme. Emphasis was placed on the benefits of parks and green spaces for health, biodiversity and as an essential element of seeking to achieve net zero carbon.
- 3.27 There was a strong view that parks and green spaces should be protected and expanded with biodiversity in and around the town centre should be enhanced.
- 3.28 The importance of new development providing green infrastructure and strengthening and developing links with existing local green spaces was raised, along with the need to seek opportunities to retrofit existing buildings.
- 3.29 Responses felt that there should be a commitment to protect the Green Belt.

Environment and air pollution

- 3.30 Comments generally sought a reduction in traffic along the High Street and an improvement in air quality, which would have multiple suggested benefits. The pedestrianisation of the High Street was suggested, along with speed reductions, energy efficient buses, and new and improved pedestrian routes.
- 3.31 Concern was raised about air pollution at the War Memorial roundabout.
- 3.32 Representations suggested that new developments and/or major refurbishments should be carbon neutral as a minimum or ideally carbon negative., with sustainable technologies and greener construction methods utilised and sustainable urban drainage schemes promoted.

Development opportunities

- 3.33 Comments on this theme were consistent with some of the comments on the Housing theme.

- 3.34 The need for high quality design, in keeping with the surrounding area, was emphasised.
- 3.35 Comments acknowledged the location of Orpington within the Cray Valley renewal area, and the potential for delivery of a significant number of new homes through the Walnuts redevelopment along with new social infrastructure, jobs and improved public realm.
- 3.36 The opportunity to deliver new residential, education and commercial development on the Orpington College campus and adjoining car park was highlighted
- 3.37 It was suggested that a landmark tall building could identify Market Square which it was felt currently lacks visibility.

4 How did the issues raised in the preliminary consultation inform the draft SPD?

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

Vision

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

Context

- 4.3 A strong theme coming through the representations was the importance of understanding the Orpington context. Therefore, having first set out the policy framework within which the SPD would operate, the SPD also addresses the context of Orpington, considering its townscape and growth over time, the topography of the landscape, the land use, scale and character of development, and local heritage and the green networks.
- 4.4 This contextual work informed the identification of the SPD character areas and sub-areas which are set out in Section 5 of the draft SPD with detailed guidance on each provided in Sections 6-9.

Design Principles

- 4.5 It was very clear from the representations that the SPD should ensure the delivery good quality design. The SPD therefore identifies six overarching design principles addressing the key characteristics of successful well-designed places.
- Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 4.6 Further detail about the principles is set out in Section 4 of the draft SPD.
- 4.7 Guidance responding to the matters raised in the consultation is provided through the 'SPD guidance notes'; these guidance notes seek to address the matters raised in section 2 of this Consultation Statement and the detailed appendices (where appropriate). Noting that the SPD cannot itself set policy, the guidance notes provide further guidance on relevant adopted Development Plan and national planning policies related to the six design principles, as they relate to the Orpington Town Centre area.

Guidance Notes 1 to 8

- 4.8 Overarching Guidance Note 1 requires proposals to demonstrate how they have addressed the six design principles set out within this SPD and specific guidance relating to the character area within which they are located.
- 4.9 Guidance Notes 2 to 8 indicate in more depth how development proposals should respond to the individual Design Principles, addressing the general quality design issues raised in the consultation.
- 4.10 Guidance Note 2 relates to the Context Design Principle. Comments on the preliminary consultation raised the importance of protecting character and distinctiveness but balanced with allowing for change and building in resilience. Guidance note 2 sets out the importance of reinforcing local identity and a sense of place through strengthening existing physical, natural, social and cultural assets.
- 4.11 Guidance Note 3 relates to the Responsive Design Principle. This emphasises the importance of high-quality design developed through a detailed process of review and collaboration. The need for high-quality design was a common theme from the consultation responses, with particular emphasis on the proposed Walnuts redevelopment (which is covered by specific character area guidance elsewhere in the SPD).
- 4.12 Guidance Note 4 relates to the Connected Design Principle, which seeks to improve connectivity in the area and establish new routes that correspond with existing routes. The need for improved public realm and key routes, including strengthened links with the railway station, were raised in the consultation.
- 4.13 Guidance Note 5 relates to the Inclusive Design Principle, which pushes new development to achieve the highest standards of inclusive design, contributing to a built environment that is safe, accessible, and convenient for all. There were several comments relating to the need to design new development to be inclusive, as well as related comments.
- 4.14 Guidance Notes 6 and 7 relate to the Healthy Design Principle, which prioritise the importance of health and wellbeing as part of the assessment of planning applications. Health came up as part of a number of comments, linked to suggestions to increase green infrastructure and improve active travel.
- 4.15 Guidance Note 8 relates to the Sustainable Design Principle, referencing key sustainable design policies to emphasise the requirement to achieve high sustainability standards. Sustainability and net zero carbon were common issues raised by respondents. Comments raised a number of potential issues which the SPD could focus on, including promoting sustainable travel, providing new green spaces, improving air quality and encouraging retrofit over demolition.

Character areas

- 4.16 As noted above, the Orpington context has informed the SPD character area boundaries. Guidance Notes 9 to 17 relate to general guidance that applies consistently across all character areas. Guidance specific to each sub-area is provided in sections 6 to 9 of the SOPD (discussed below).
- 4.17 Guidance Note 9 relates to heritage and conservation issues, highlighting the importance of the historic environment in Orpington which adds significantly to the character and distinctiveness of the area. The Guidance Note expects development proposals to clearly address heritage impacts. A number of consultation comments related to the historic

environment; respondents suggested that the SPD should acknowledge the benefits of the area's heritage assets and should manage development (including tall buildings) in relation to their impacts on heritage assets.

- 4.18 Guidance Note 10 addresses density, referencing the London Plan design-led approach to ensure the most appropriate form and land use for the site. A number of consultation comments across several themes raised the issue of density; some comments were supportive of increasing density but noted the need to ensure high quality design and provision of other benefits such as improved public realm and green infrastructure.
- 4.19 Guidance Note 11 sets requirements for the consideration of proposals for tall buildings in Orpington, in line with policy D9 of the London Plan. The guidance note references the importance of local views. There was some support for taller buildings in the consultation comments, but respondents note the need for high quality design and for proposals to be contextual. Some respondents thought Market Square was a particularly suitable location for tall buildings.
- 4.20 Guidance Notes 12 and 13 relate to Transport and connectivity in Orpington. These Guidance Notes promote enhancements to existing pedestrian and cycling routes and the creation of new routes, noting that the route to the station is a priority. Improved permeability to enhance sites at the rear of the High Street is also promoted, with greening of new routes encouraged. These Guidance Notes relate to a number of comments made across different themes. The link to the station was raised by a number of respondents. Comments also referred to the need to diversify the High Street; the opening up of backland sites offers the potential for new/expanded uses to add to the town centre's diversity.
- 4.21 Guidance Note 14 addresses green infrastructure and biodiversity in Orpington. It promotes the enhancement of biodiversity as part of the network of green spaces linking with the wider Cray Valley. Biodiversity was an issue that was raised across a number of comments, which highlighted the importance of the issue and the need for development in Orpington to contribute to improved biodiversity.
- 4.22 Guidance Note 15 addresses sustainability concerns, reflecting adopted policy in the London Plan. Sustainability was a popular issue raised by respondents, particularly relating to achieving net zero carbon emissions. Retrofitting was also raised; the Guidance Note encourages retrofit and links with guidance for certain character areas with existing building typologies where a retrofit approach may be a practical proposition.
- 4.23 Guidance Note 16 reiterates the particular Renewal Area policy requirements relating to development in Orpington. These policy requirements overlap and address many of the consultation comments received.
- 4.24 Guidance Note 17 relates to the new Use Class E and associated PD rights. The introduction of Class E and the PD rights post-dates the start of the consultation. While Class E does allow for some flexibility with town centre uses, it could affect the vitality and viability of town centres. Consultation comments noted the need for diversity of uses with a mix of cafes, restaurants and entertainment uses amongst other uses. The Guidance Note will help to ensure that any adverse impacts of Class E and the PD rights are mitigated to protect the ongoing vitality and viability of the town centre.

Character areas and sub-areas

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

- **Orpington East character area**

- Market Square, Orpington College & the Walnuts Shopping and Leisure Centre sub-area
- Eastern Edge sub-area
- **Orpington North character area**
 - The Village sub-area
- **Orpington West character area**
 - Orpington High Street sub-area
 - Western Edge sub-area
 - Orpington Station & York Rise sub-area

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

5 Draft SPD consultation information

- 5.1 From 9 March 2022 to 1 July 2022², the Council consulted on the draft Orpington Town Centre SPD.
- 5.2 The consultation was publicised extensively, as follows:
- The draft SPD and supporting documents³ were hosted on the Council SPD webpage⁴, with a link from the main consultation webpage⁵. Comments were invited by email, in writing or via a questionnaire hosted on Survey Monkey.
 - The consultation was promoted in Council's digital newsletter (to 70,000 residents).
 - Letters and emails notifying residents of the consultation were sent to all consultees that were registered on the Council's planning policy database.
 - Three Council news releases were issued - one at launch, one as a reminder mid-consultation⁶, and one as a final reminder prior to the consultation deadline. These news releases were also shared with the Business Improvement District (BID), community groups and residents associations, who were encouraged to circulate to their members.
 - Social media posts scheduled between the news releases from the Council's accounts, using graphics created to promote the consultation
 - Three digital posters created to display on the digital advertising screens in the town centre. Copies of the posters were also distributed to local libraries.
- 5.3 996 representations⁷ were received in total, as follows:
- 468 via email.
 - 406 in writing (hard copy) including 365 responses submitted in a template created by a local campaign group ('Nuts to the Walnuts').
 - 122 responses submitted via the Survey Monkey questionnaire on the Council's website
- 5.4 768 respondents (77%) live or work in the Orpington area (within BR5 and BR6 postcode areas).
- 5.5 The Council wishes to thank all respondents for taking the time to respond to the draft SPD. All comments have been considered and have helped to inform the final SPD. Section 6 of

² The consultation was initially planned to run from 9 March 2022 to 1 June 2022, but was extended by one month to allow additional time for submission of responses. This extension of time was publicised in the same manner as the initial consultation.

³ Supporting documents were a previous version of this consultation statement (detailing the information in sections 2 to 4, and appendices 1 to 3; and a Strategic Environmental Assessment screening statement.

⁴ <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

⁵ <https://www.bromley.gov.uk/consultations>

⁶ The consultation took place over the 2022 Local Election Purdah period, which limits what information can be publicised; therefore the mid-consultation reminder was not sent until post-Purdah.

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

this document summarises the comments received, while Section 7 provides the Council's response to the comments.

6 Draft SPD consultation responses

6.1 This section sets out the key headlines of the responses received as part of the draft SPD consultation between March and July 2022. Details are set out as follows:

- Summary of 'Nuts to the Walnuts' campaign group responses
- Summary of issues raised by consultation responses

Summary of 'Nuts to the Walnuts' campaign group responses

6.2 365 responses were received from the 'Nuts to the Walnuts' campaign group. These responses were submitted via a standard questionnaire template (see example at Appendix 4) or in a very similar form. The template also invites respondents to provide additional comments; these are summarised in the section below ('Summary of issues raised by consultation responses').

6.3 The following eight specific issues were identified by the questionnaire, with respondents invited to tick the issue/issues that they felt strongly about:

- No buildings taller than Brunswick House
- Leisure centre updated or new one built before demolition
- Enough GP surgeries and hospitals
- Enough schools
- Public transport
- More visitor parking spaces
- Keep functioning shops we have now
- Keep character of small Kent town

6.4 Table 2 sets out the response rate for the eight issues. 241 respondents (66%) ticked every issue:

Table 2: Response rate to 'Nuts to the Walnuts' template responses, by issue

Issue	Number of responses to raise this issue	% of responses to raise this issue
No buildings taller than Brunswick House	317	87%
Leisure centre updated or new one built before demolition	329	90%
Enough GP surgeries and hospitals	328	90%
Enough schools	318	87%
Public transport	316	87%

Issue	Number of responses to raise this issue	% of responses to raise this issue
More visitor parking spaces	294	81%
Keep functioning shops we have now	318	87%
Keep character of small Kent town	311	85%

Summary of issues raised by consultation responses

- 6.5 631 consultation responses were received via email, in writing and via a questionnaire on Survey Monkey. In addition, 318 'Nuts to the Walnuts' template responses provided further comments in addition to completing the questionnaire indicating which if the eight issues they felt strongly about.
- 6.6 The issues raised by the respondents have been grouped into the following topics for the purpose of this consultation statement (NB: some respondents raised commented on more than one topic). Comments which did not fall under these topics are discussed in the general comments section. Two respondents commented on the Strategic Environmental Assessment screening statement that accompanied the consultation; these comments are also discussed below.
- 6.7 Section 7 sets out the Council's response to the issues raised in paragraphs 6.8 – 6.235.

Table 3: Response rate to draft Orpington Town Centre SPD consultation, by topic

Specific Topic	Number of responses to respond to this topic	% of responses to respond to this topic
Tall buildings, character	691	73%
Social infrastructure	381	40%
Heritage and design	213	22%
Transport	351	37%
Leisure centre	562	59%
Housing inc. Affordable Housing	251	26%
Environment and air quality	251	26%
Commercial uses (retail, leisure, office)	401	42%
Public realm, permeability and connectivity	292	31%

Tall buildings, character

- 6.8 A number of respondents noted the importance of protecting local character, including comments about the need to retain Orpington's small Kent town character and leafy suburban/open/rural characteristics. Respondents noted the potential for high-density new development to impact significantly on character. A number of comments also raised the need to protect views of the Kent countryside as currently viewed from the town centre. Some respondents noted that Orpington should not seek to compete with Bromley Town Centre, it has its own distinct character which should be protected. Many respondents commented that

they were satisfied with the current level of development, indicating that new buildings should respond to the height, scale, bulk and mass of existing buildings.

- 6.9 Several respondents commented that they were keen to see Orpington revitalised (noting agreement with the Building Back Better High Streets initiative) which they felt could act as a catalyst for further regeneration. There was some support for sensible, proportionate development, upgrading and improving sympathetically in keeping with existing buildings.
- 6.10 Many respondents commented on tall buildings, expressing the following concerns:
- Orpington should only have low rise developments in keeping with the surrounding area.
 - 'Nuts to the Walnuts' commented on building heights provided comments based on a Facebook survey. The group stated that sensible proportionate development plans for Orpington are supported, particularly considered and sympathetic development on a scale which is in keeping with existing buildings, and which is realistically deliverable within the town's existing infrastructure and safeguards the quality of life here for current and future residents. For these reasons the group considered 6 blocks of flats, around 1 – 4 storeys tall would be suitable, but ultimately buildings should be no taller than the nine storey Brunswick House; no planning or design justification was put forward to support this but it is aligned with the majority view from their Facebook survey.
 - A number of other respondents suggested Brunswick House as an appropriate basis for determining the heights of new buildings.
 - There were numerous other suggestions for capping heights, ranging from one to nine storeys. Several respondents suggested that development should be 'human scale'.
 - A number of respondents considered that an additional wayfinding building is not necessary, as Orpington already has the 11 storey Orpington College which acts as a wayfinding building.
 - 'Nuts to the Walnuts' questioned why the Council consider that Orpington East could host a 12 – 15 storey building, or taller, if it is "a visual marker providing a positive landmark at the heart of Orpington Town Centre" (SPD paragraph 6.4, p35)? The group considered that this would clearly not fit with the overall form and layout of the surroundings and is contrary to the advice in national planning policy, GLA officers (as expressed in the GLA Stage 1 response to the planning application for the Walnuts site) and elsewhere in the SPD (paragraph 5.15, p26). The group note that area is characterised by a range of two and three storey buildings; and that tall buildings will not preserve or enhance the existing qualities of Orpington's town centre. They will block out light, change the skyline and are incompatible within such close proximity to the town's Conservations Areas.
 - A respondent sought clarity about the Walnuts and the College site and considered it is ambiguous whether the guidance allows buildings of more than 15 storeys.
 - 'Nuts to the Walnuts' noted that planning permission is often granted using existing buildings as precedents, therefore permission for a single 12 – 15 storey building in Orpington East would be concerning as developers may get permission to build several more tall buildings in the Eastern Edge, Western Edge, Orpington High Street and the Orpington Station and York Rise sub-areas. This would be terrible for the town and its residents. Furthermore, the precedent could be used throughout the area and there could be successful submissions for tall buildings elsewhere, e.g. in Derry Downs. Other respondents made similar points, noting the potential for 'tall building creep'.
 - A number of respondents raised the potential for tall buildings to cause microclimate, overshadowing and overlooking impacts, with some stating that proposed buildings which would cause significant light loss and shadowing be denied planning permission.
 - A respondent suggesting that if tall buildings go ahead then higher elements should be for commercial purposes as this is less intrusive in terms of overlooking

- Some responses considered that tall buildings are bad for mental health, with a specific concern raised regarding the physical environment created by tall buildings for those with sensory processing disorder, autism or ADHD.
 - Some responses considered that tall buildings will lead to an increase in crime and ASB.
 - Several respondents suggested that tall buildings are not suitable for children.
 - The expense of maintenance of tall buildings was highlighted
- 6.11 A number of respondents raised issues relating to fire safety, with some citing the Grenfell Tower tragedy and subsequent public inquiry. Some responses raised concerns relating to the evacuation of people with limited mobility from upper floors.
- 6.12 'Nuts to the Walnuts' consider that the SPD should state that all developers building high-rise homes will be contractually obliged to fund and carry out Personal Emergency Evacuation Plans (PEEPs) once residents have moved in. PEEPs for subsequent residents should be funded by the management company or freeholder. Other respondents noted concern about the lack of fire appliances to tackle fires in high-rise buildings, and the need to consult the London Fire Brigade on tall building applications.
- 6.13 'Nuts to the Walnuts' also consider that the SPD should state that developers must fully uphold several legal obligations, including the Fire Safety Order 2005, the Equality Act 2010, and the Human Rights Act 1998, as a condition of planning permission being granted.
- 6.14 'Nuts to the Walnuts' consider that applications for tall buildings should be required to carry out computer modelling to show the extent of overshadowing that would occur if buildings are constructed; and that information should be sought to ascertain any impacts as a result of any increased winds.
- 6.15 One respondent noted the need for tall buildings to have disabled access.
- 6.16 A number of respondents referred to recent development of taller buildings in areas such as Croydon, Lewisham and Greenwich, and further afield in Hong Kong, Tokyo and Manhattan; there was a general view that these developments were poor and that they should not be replicated in Orpington.
- 6.17 Historic England noted concerns about the potential for a very tall building as part of development of the Walnuts shopping centre; this is discussed in more detail in the 'Heritage and Design' section below. Notwithstanding comments in relation to tall buildings on specific sites, Historic England noted that SPD 11 (tall buildings) should also include reference to local plan policy 42 as well as NPPF section 16, given the potential for visual impacts on nearby heritage assets. This was echoed by a number of other respondents who stated that consideration of the impact on the adjacent conservation area and local views of importance (including views not designated in the Local Plan) must be given before planning permission is granted. Other respondents raised the potential for impacts on the Green Belt and nearby AONB.
- 6.18 Several respondents cited the London Assembly Planning & Regeneration Committee investigation on living in high rise buildings, to support comments on the adverse impacts of tall buildings.
- 6.19 Orpington 1st considered that the height of development in the town centre should not be unnecessarily restricted – particularly if it facilitates broader benefits; but providing that the architecture, design, and delivery are of the highest quality.
- 6.20 A developer/landowner welcomed the guidance on the Walnuts and Market Square in the draft SPD, which identifies the opportunity for delivering a significant quantum of new housing

and commercial development, alongside a new leisure centre, public realm enhancements and provision of significant green space / play space / street greening. The respondent notes support for several elements of the guidance including retaining Market Square as the civic heart of Orpington, the promotion of additional greening and connectivity improvements. However, the developer/landowner notes concerns about some of the key parameters for development proposals in this area

- LBB do not provide any justification within any accompanying evidence base to the draft SPD that tests the appropriateness of the heights contained within the key parameters. In the light of this, the LBB have failed to demonstrate how the identified heights for this development opportunity area have been established. The guidance set out in the draft SPD is to inform the how the Development Plan is to be delivered; however, the draft SPD is not “sound” as defined by paragraph 35 of the NPPF e.g. it is not justified through proportionate evidence and is not consistent with national policy on several matters. The respondent considers that no evidence has been provided to robustly justify why or how the heights and massing set out in the key parameters have been established (which is required by London Plan policy D9). It is important to highlight that there is a need for a balanced approach when considering development proposals that include tall buildings such as those at the Site. It is therefore recommended that the key parameters with regards to height are revised and/or justified through proportionate evidence. In the absence of a proportionate evidence base, Guidance Note 11 should be revised to simply acknowledge the site is appropriate for tall buildings and that actual heights fall to be determined at planning application stage following completion of a full assessment considering all relevant criteria set out in London Plan Policy D9.
- within the draft development parameters, reference is made to the use of red and buff brick on the High Street to inform new development in the area. The respondent is opposed to this prescriptive requirement and encourages the LBB to replace this with a requirement for development in this area to draw upon key characteristics of the surrounding area when considering the proposed materiality of developments. This then provides opportunity for other materiality approaches to be explored.

6.21 The developer/landowner also commented on guidance provided for the Orpington West area, noting that whilst the high street is predominately characterised by 2-3 storeys this should not be a blanket approach when considering appropriate heights for this location. When establishing appropriate heights on the High Street and the area behind, proposed heights should be robustly tested and justified at planning application stage having regards to relevant policy considerations.

6.22 A local group supported the reference to the National Design Guide in paragraph 5.9 of the SPD.

6.23 A local group considered that the descriptions in paragraph 5.10 were too general and should be enhanced by referring to the specific Grade listing.

6.24 A local group expressed concern about guidance note 9, considering that it does not appear to defend heritage assets in line with the Historic Environment Objectives set out in the Bromley Local Plan. They consider that the emphasis is on minimising impact assessments, rather than conducting effective impact assessments; and that the guidance that the “level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on its significance” is open to wide interpretation, and is itself not sufficient. It seems skewed in favour of developers. The group consider that a more satisfactory wording would be the “level of detail should be proportionate to the asset’s importance and clearly demonstrate the potential impact of the proposal on its significance, including a worst-case scenario”. They believe that this should ensure that the

impact of green or tree screening is considered, including in winter, when trees are bare of leaves.

- 6.25 The local group also consider that guidance note 9 should further state that Visual Impact Assessments should be made from positions where the view is clear, and not obscured. As a general principle, it should always be clear that any development should enhance the environment by showcasing history, not detracting from it.
- 6.26 A local group reference London Plan policy GG2 (E), noting this is reflected in para 5.9 of the draft SPD, but does not appear to be reflected in Guidance Note 9. The group also suggest that the SPD should include stronger encouragement of a heritage centre / space / offering, which would be in keeping with London Plan policy GG1 (C) to “provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation”. Since the museum was closed, and the Priory building closed to the public there has been no cultural offering in the town for low-income families, and this should be promoted in the SPD, consistent with Bromley Local Plan’s Historic Environment Objectives.
- 6.27 One respondent suggested GN7 require tall buildings to provide publicly accessible viewing terraces, and rooftop gardens, whilst another highlighted that green spaces on top of buildings are rarely accessible to the general public.

Social infrastructure

- 6.28 A number of respondents raised the issue of existing pressure on infrastructure, which could worsen as a result of new development. Responses noted that new development should ensure that impacts of various types of infrastructure will be mitigated, including through provision of new services. The following types of infrastructure were highlighted specifically:
- GPs/nurses/doctors surgeries
 - Midwives
 - Community nurses
 - Social Services
 - Carers (specifically for the elderly),
 - Hospitals/ Urgent Care / A&E / Ambulance services
 - Mental Health provision (child, adolescent and adult)
 - Schools (primary, secondary, special educational needs)
 - Lifelong learning / adult education program for adults
 - Nurseries
 - Dentists (NHS)
 - Opticians
 - Police stations / hub and greater police presence/resources where necessary, to tackle existing ASB/crime and potential increases in ASB/crime as a result of new development.
 - More CCTV should be installed in the area to deter criminal behaviour
 - Fire station as a result of increased fire risk from taller buildings.
 - Facilities for the community - a community hub, for all generations and all abilities – noted difficulty for Orpington Dance school to find locations to run sessions. Other suggestions include an arts centre/community.
 - Sports facilities noting that private clubs are unaffordable for most Orpington residents.
 - Facilities for an ageing population – notably a good quality day care centre.
 - Places / facilities to support young people (youth centre). The positive impact of the temporary ice rink / pallet park at the rear of the leisure centre were flagged.
 - Cultural centre (one respondent suggested the college be repurposed for this).

- More recycling bins and litter pickers.
- Additional toilets accessible to all (specifically on the High Street).
- Decent sized church (specific reference to Hope Church currently located in the Walnuts).
- Spaces (indoor & outdoor) to host community events.
- Water fountains - to encourage reuse of water bottles.
- Waste facilities
- Water supply infrastructure and ability to manage surface water drainage – particularly during heavy rainfall.
- Flood protection
- Sewerage system
- Internet and communications

- 6.29 Local NHS stakeholders welcomed the vision set out in the SPD recognising the role the town centre will play in supporting the health and wellbeing of the south-eastern area of the borough. They raised the potential for growth and development in the town centre impacting on service provision and need for close working and engagement between the Council, the NHS and other infrastructure providers to identify impacts and necessary infrastructure provision at an early stage.
- 6.30 The NHS Healthy Urban Development Unit noted support for guidance notes 16 and 17 but suggested minor changes to guidance note 6 to impose a stronger requirement for Health Impact Assessments to be submitted as part of planning applications.
- 6.31 A number of respondents stated the importance of retaining the Saxon day centre. Some comments suggested retaining the existing centre as is, while others were more open to replacement facilities in the area but were clear that any replacement facility must be operational prior to the existing centre closing.
- 6.32 A local group suggested re-siting the Saxon Centre to Priory Gardens depot, with potential to expand health and wellbeing activities, create community garden, and benefit from access to formal gardens and green space.
- 6.33 'Nuts to the Walnuts' and other respondents recommended that the SPD include facts about the capacity of the town's existing infrastructure. The Council should obtain up-to-date reports on the availability of local nursery, primary and secondary school places, capacity at local GP surgeries and at local hospitals. The group, and other respondents, considered that accepting a sum of money from developers under the Council (sic) Infrastructure Levy (CIL) or by other routes does not absolve Officers and elected Councillors of their responsibility to ensure developments do not overload our existing infrastructure and that the Council should agree with developers that a large sum of money should be set aside and ring-fenced for use within Orpington town centre, to pay for the extra infrastructure required to support their plans.
- 6.34 Orpington 1st raised a similar issue, stating that the service provision from local and central government should reflect need, and the capacity requirement should be clearly referenced in planning. They would like to see reference to funds received by LBB for town centre developments being ringfenced for the benefit of the town.
- 6.35 A respondent considered that CIL may not fully off-set the required infrastructure required to support a development. A GAP exercise should be carried out to accurately identify issues in conjunction with other developments being progresses. Public realm improvements have been supplied through the BID partnership levy, so transparency is needed. The respondent also considered that paragraph 2.20 should be amended to include reference to social housing and homes for vulnerable.

- 6.36 One respondent considered that section 6 of the vision should add “facilitate” to as many activities as these activities would be organised by groups not the Council.
- 6.37 ‘Nuts to the Walnuts’ consider that the SPD should clearly state the density of new housing which the existing infrastructure can realistically support. Developers should have clear and deliverable plans on how to expand the infrastructure if larger numbers of homes are proposed. Developers should also bear most of the cost of any expansion.
- 6.38 ‘Nuts to the Walnuts’ recommend that the Council consult the Metropolitan Police in relation to police provision.
- 6.39 ‘Nuts to the Walnuts’ and other respondents state that the SPD should make it clear that the College should remain an educational establishment and not be used for residential or any other purposes. One respondent suggested that any redevelopment of the college building should prioritise retrofit rather than demolition and rebuild.
- 6.40 A developer/landowner supported the requirement to undertake extensive consultation (Draft Guidance Note 5) and to ensure that development proposals seek to promote and prioritise health and well-being (Draft Guidance Note 6).
- 6.41 One respondent suggested the inclusion of Policy 22 [Social Infrastructure in New Developments] in para 2.14.
- 6.42 One respondent noted their belief that the SPD vision confirms the college will remain.

Heritage and design

- 6.43 Historic England welcomed much of the content of the draft SPD including Sections 3 and 4 on the context and scale of the area and on future design principles. They considered that these sections usefully set out detail on understanding how the town centre has come to look and feel as it does today as well as sound principles relating to contextually successful new development proposals. Historic England did however note concern about the development opportunities outlined in section 6 (Orpington East sub-area); they considered that these are not based on an appropriate evidence base and that potential effects on the historic environment have not been properly assessed, understood or avoided. In particular, they consider the identification of the Walnuts shopping centre as a suitable site for what would be in local terms a very tall building to be premature at this stage, and that the draft SPD is in effect allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings.
- 6.44 Their principal concern with the contents of the SPD however relate to the proposed density and heights of development on the site of the Walnuts shopping centre. Historic England acknowledge the development potential of the site but consider that the draft SPD is premature in proposing development of the density and height in question without robust evidence to support it or understand the level of impacts likely to occur. It is noted that this site has come forward independently of the local plan process, and would appear to date to have not been subject to any assessment of the potential environmental effects the type of development suggested. The site is in close proximity to a number of designated heritage assets, including two highly graded listed buildings, the Orpington Priory conservation area and Priory Gardens registered park and garden. Together these assets help form the village-like character of the area to the north of the High Street. Historic England consider there is potential for adverse impacts on this character and the individual significance of assets if as proposed the site is allocated with a taller building of up to 15 storeys. This point is echoed by other respondents, as can be seen in the ‘tall building’ responses noted above.

- 6.45 Historic England further note the indication at paragraph 1.3 that the preparation of the draft SPD for the town centre will inform the local plan review process. Should the allocation of the Walnuts shopping centre site and the design parameters at paragraph 6.4 be confirmed in the SPD and carried forward to the emerging local plan, they consider that it would not be possible for the Plan to be in conformity with national and regional planning policy as it relates to the historic environment. Historic England conclude that, in relation to the Walnuts site, the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan; and that, while this is potentially problematic in itself, the absence of evidence and assessment of potential effects also fails to reflect the requirements of NPPF paras 31 and 190.
- 6.46 Due to these concerns, Historic England consider that the SPD should be subject to an SEA to ensure that the development process would proactively look to conserve and enhance the historic environment. They refer to various good practice and advice notes on issues that they consider are of relevance relating to the production of SPDs and SEAs. This is discussed in paragraphs 6.230 to 6.235 below.
- 6.47 Historic England welcome the helpful reproduction of the commitment to the protection and enhancement of the local historic environment from the adopted Local Plan at paragraph 1.7, but suggest that this should also be made explicit in the vision statement set out on page 4.
- 6.48 Historic England consider that section 2 (Policy framework) should be expanded to include relevant references to the historic environment in national, regional and local planning policy, particularly Local plan policies 38 (listed buildings), 41 (conservation areas) and 42 (development adjacent to a conservation area) and London Plan policy HC1 (Heritage conservation and growth).
- 6.49 Historic England welcome the sections and associated design principles on context and responsiveness at paragraphs 4.3 to 4.11, although they consider the first sentence of SPD2 to require some clarification. In NPPF terms, the word setting has a particular meaning (as set out in the NPPF glossary). Historic England note that, if the sentence in question is not referring directly to the setting of heritage assets, the terms townscape or character would be clearer in this instance. They also note that Local plan policies 38, 41 and 42 should be included in the list of relevant policy. A developer/landowner also noted that the current drafting of Guidance Note 2 is ambiguous and the use of the term “setting” without further clarification has the potential to be conflated with established policies relating to heritage assets. Suggested amended wording was put forward.
- 6.50 Historic England note that SPD 11 is clearly closely linked to the windfall sites identified in the form of the Walnuts shopping centre and Orpington College, and given the potential for visual impacts on nearby heritage assets, this section should also include reference to local plan policy 42 as well as NPPF section 16.
- 6.51 Historic England recommend that paragraph 3.25 is reconsidered to reflect the Archaeological Priority Area Tiers represented by this SPD, while it may prove helpful for a short Glossary to be added to the SPD where for example it can be clearly stated what is meant by Heritage.
- 6.52 Historic England suggest that there is potential for a separate Archaeology SPD for the Town Centre, referring to an example in Sutton. They consider that this would mean that potential developers could determine with confidence the archaeological context of their site and whether it would require early consideration in the planning process. It would also present a tool whereby public value can be expressed through the identified heritage, in the form of street art/furniture and other mediums and community activities in addition to opportunities to identify, enhance and cherish the heritage that makes these areas special.

- 6.53 'Nuts to the Walnuts' were pleased to see the Village sub-area's historic origins and distinctiveness recognised in the SPD, and that the sub-area's development potential is classified as low, which seems in keeping with the conservation status of most of that area. Another respondent suggested no development forward of the front building lines or above the current roof lines in the Village area.
- 6.54 'Nuts to the Walnuts' request that the SPD states that the external appearance of developments are important and that quality materials should be used which not only comply with safety standards, but are also pleasing to the eye and are in keeping with the surrounding area. Other respondents suggested that design should conform to the architectural and cultural heritage to maintain Orpington's traditional and historical setting. Some respondents referenced the need for beautiful development, citing the changes to the NPPF relating to beauty.
- 6.55 'Nuts to the Walnuts' consider that the SPD guidance about design-led development (paragraph 5.12, p25), which clearly states that quality of place should take precedence over the quantum of new development, is contradicted by the statement at paragraph 6.3, p35, which states that redevelopment of the Walnuts site offers the opportunity for delivering a significant quantum of new housing and commercial development. The group, and other respondents, consider that the SPD should be clear that the focus is on quality of place, not the quantity of new development.
- 6.56 Other respondents stressed the desire for development that would bring local pride and regenerate a local identity as much as the local economy.
- 6.57 A number of respondents noted that part of the High Street and North End of the town centre is a conservation area; and suggested that the rest of High Street and surrounding roads could be included too to preserve heritage. Respondents noted the importance of certain heritage assets in the area.
- 6.58 Several respondents noted the importance of protecting the character of residential areas on the edge of the town centre, and the need to mitigate any impacts of development on these areas.
- 6.59 One respondent noted the reference to scale of surroundings in the vision, and suggested that scale should be defined/limited as minimal change to that which already exists. The comment suggests that scale could in itself be the characteristic even if totally out of proportion to the town.
- 6.60 Some respondents stated a preference to restore old buildings of architectural merit to support existing businesses (the Post Office refurbishment was highlighted as a success), whilst another suggested brick cladding on developments, and another suggested artificial fronts to existing buildings where necessary to produce a homogenous high street that resembles a 1930s high street.
- 6.61 A local group suggested that the disposal of and subsequent limited public access to the Priory despite its historic and cultural value to the town, and the moving of the museum to Central Library despite many of the artefacts originating from and relating to Orpington and its environs, has had a detrimental impact on the Town Centre's cultural offer. The group suggest that the SPD acknowledge the impact that the disposal has had on the town centre and local community. Another respondent suggested that the Priory should be preserved.
- 6.62 There was support for proposals to take account of culture, heritage, scheduled monuments and archaeology in the planning process, and for the SPD guidance encouraging submission of a heritage statement.

- 6.63 Several respondents felt the opportunity should be taken to highlight various aspects of the history of the area.
- 6.64 Another respondent noted concern at the loss of the former water fountain in the Upper Pond and the former model boating 'lake' in Riverside Gardens
- 6.65 A respondent felt more clarity on what constitutes "enhancement" should be provided – suggests "by enriching or raising the standard of design or" be added after "High Street" in GN13. Another respondent supported the vision but sought definitions of both "enhanced" and "enrich".
- 6.66 One respondent questioned a change in policy from Areas of Archaeological Significance to Archaeological Priority Areas and felt that the SPD should be amended to refer to the draft Archaeological Priority Areas.
- 6.67 A respondent was concerned that the Crofton Villa area should be protected and not be over developed; another suggested no development 'by the Roman Villa'.
- 6.68 A developer/landowner considered that the requirement to ensure schemes are reviewed by an independent Design Review Panel will assist in ensuring that high quality development is brought forward in the town centre and as such, the requirement was supported.
- 6.69 Other respondents made the following comments in respect of an independent Design Review Panel referred to in GN3:
- conclusions should be advisory only, and should not be given priority over local residents' views.
 - the panel should include a proportion of local residents.
- 6.70 A respondent suggested running an architectural competition to provide some characterful fronts to shops to small parades alongside small terraces of attractive houses.
- 6.71 A respondent felt there should be more space around taller buildings to avoid a massive "Block" on the skyline. Another respondent sought clarification of the term 'block' in SPD paragraph 6.18 – does it mean one building or a block in the American sense, a group of buildings?
- 6.72 A respondent felt paragraphs 6.4 and 8.7 needs stronger word than "inform" when referring to building materials to be used.
- 6.73 A respondent raised concern about the lack of reference to Secured by Design (SBD), noting that safety and security measures can be included in the design and layout of buildings and public areas, keeping residents, workers and visitors safe.
- 6.74 One respondent considered that Guidance Note 3 should include whole life costing and maintenance, residual design risk, decommissioning requirements. Design scrutiny should include construction engineering.

Transport

- 6.75 Orpington 1st noted that while existing north - south connectivity is good, the town's connectivity east-west is lacking, and as the town grows, additional public transport and sustainable transport options will be needed to alleviate the need for more private cars. They considered that car free developments should be encouraged and prioritised over the building

of additional car parks as we must think beyond the here and now and build for the future, preparing to be less reliant on private vehicles.

- 6.76 Conversely, a number of other responses questioned the references to car free development stating that it is confusing and out of place. Several respondents stated that public transport is weak and therefore adequate parking should be provided.
- 6.77 A number of respondents noted the need to protect existing parking provision and the need for more parking, including better disabled parking, to ensure that the town centre will still attract visitors. More underground parking was suggested as an option. There was concern that new development would exacerbate parking issues.
- 6.78 One respondent suggested the provision of more parking outside retailers (referred to as 'park and pop').
- 6.79 One respondent suggested reducing car parking to one side of the high street to help with pollution and safety. They also noted that if the bypass width was increased this would reduce the stress on the high street.
- 6.80 Orpington 1st stated that commercial vehicles need well-located loading bays and will require electric charging posts in the future. They and other respondents stated that increased pressure from delivery vehicles, Uber trips, etc, need to be fully understood and properly catered for.
- 6.81 A local group suggests changes to paragraph 4.14 to be more ambitious in the aim to promote healthy streets and encourage sustainable modes of transport. The group made a number of suggestions to achieve this, including:
- completing the shared cycle route along Cray Avenue to Carlton Parade as a priority;
 - reviewing cycle route through Priory Gardens with stakeholders;
 - upgrading the footpath between Old Priory Avenue / Bark Hart Road beside Lych Gate Road to Homefield Rise to a shared foot/cycle path, as an alternative route to the High Street, incorporating the link to Lancing Road;
 - adding alternative routes avoiding Knoll Rise to connect with LCN22 on Lynwood Grove, e.g. Broomhill Road, Keswick Road, Stanley Road, Lucerne Road.
 - the potential for a cycle route linking Crofton Road cycleway, via station platform underpass and upgraded footpath to Hillview Crescent, Mayfield Avenue, Knoll Rise to High Street.
 - protected/segregated cycle route to negotiate War Memorial Roundabout to enable safer cycling to the High Street.
 - segregated/protected contra-flow cycle route avoiding the one-way system towards Carlton Parade.
- 6.82 A local group noted that the area around Orpington Station is dominated by vehicle traffic, associated emissions and noise, with negative impacts on walkability, exacerbated by often narrow, uneven and poorly maintained footways. The group and a number of other respondents consider that improving the public realm in partnership with Network Rail / Southeastern should be a priority commensurate with Orpington's standing as a Major Town Centre, in addition to improving active travel routes between the Station and High Street including the walking / cycling route from Crofton Road and the station forecourt via the platform underpass and Station Approach, upgrade footpath to a shared path linking up with Hillview Crescent and Mayfield Avenue to Knoll Rise (LCN22).

- 6.83 A number of respondents suggested that the PTAL rating of 4 (moderate) in the area of the Walnuts should be stated in the SPD. One suggests that the PTAL for each character area is highlighted, and that the Council ensure the correct parking allocation in applications.
- 6.84 One respondent recommended that future planning applications are rejected because of potential traffic impacts. Another suggested that suggests that road congestion should be a limiting factor to the size/density of future housing.
- 6.85 A number of respondents raised the issue of traffic congestion, and suggested this might worsen as a result of new development.
- 6.86 Orpington 1st noted that the transport links to London are a major attraction for businesses and residents locating or relocating to the town centre; they fully support a vision to continue to improve the station as a transport hub with associated infrastructure, so it is a vibrant and welcome access point that can integrate more effectively with the surrounding area and town centre. There should be opportunities to expand and modernise the site with additional associated businesses, and services that complement the transport hub.
- 6.87 Orpington 1st also note there is opportunity to showcase the significance that the railway had in the history of the town and to incorporate Crofton Halls and the Crofton Villa into the story, offering a more attractive destination.
- 6.88 Several respondents raised the need for better bus routes, including routes that are fully accessible for disabled people.
- 6.89 One respondent noted that Orpington is a major shopping venue for a rural catchment with poor public transport (Downe, Chelsfield, Knockholt) so driving is the only option.
- 6.90 One respondent suggested that traffic in the high street could be reduced by making it one way, or increasing pavement area. They also suggested proper cycle paths and a bike hire facility.
- 6.91 Another suggested that the development of the Walnuts includes a road from the high street to Lych Gate Road so that the high street can be pedestrianised, and buses can drop off near the walnuts development.
- 6.92 Several respondents suggested that the High Street should be fully or partially pedestrianised, some recognising that it would need careful consultation with the residents who would be affected, while a number of others objected to the idea of pedestrianisation entirely.
- 6.93 One respondent suggested closing the High Street to general traffic and only allowing buses and disabled drivers, another suggested restricting high street traffic to electric vehicles, cycles and disabled badge holders.
- 6.94 Another respondent stated that Orpington needs good road access and that road access should take priority over cycle lanes that are often underused.
- 6.95 Conversely, one response states that buses should be removed from the town centre because they are contributing to very poor quality air. They suggest a bus terminus in Gravel Pit Way,
- 6.96 A local group considered that the redevelopment of The Walnuts and Market Square should consider other options including extending footprint over Lych Gate Road (service road) to reduce severance.

- 6.97 A local group support provision of secure, safe public cycle storage to enable active travel and support the economy, and take account of additional security concerns during the evenings.
- 6.98 A local group considered that the main approaches to the High Street create severance and are often barriers to active travel, e.g. A223 Sevenoaks Road, A232 Station Road / Spur Road, A224 Cray Avenue / Court Road, due to volume and speed of vehicles. The group suggested that a 20 mph speed limit should be extended from High Street to cover surrounding areas where residents live unless there are segregated/protected footways and cycleways. The group favours through traffic being directed to via Spur Road to reduce traffic in High Street.
- 6.99 Commenting on the guidance in the Village sub-area, a local group suggest that filtering through traffic away from Church Hill would enhance the approach to All Saints Church; and question the necessity of one-way system around Chislehurst Road, Goodmead Road and Perry Hall Road and whether the High Street could revert to two-way traffic (or alternatively would a contra-flow lane for cyclists along the High Street be feasible).
- 6.100 The same local group made further suggestions to improve cycle route options by adding a cycle contra-flow to the one-way section of Augustus Lane, and onwards via Berwick Way through access road to High Street at mini roundabout.
- 6.101 Several respondents suggested that proposed new cycle lanes must be subject to consultation.
- 6.102 A local group think the Council should review on-street parking provision to create a healthier high street for all; prioritise sustainable transport and convenient Blue Badge parking.
- 6.103 A local group commented on access to the station, noting that better connectivity to the High Street is essential, and priority should be given to creating attractive, healthy and safe walking, wheeling and cycling routes. The group suggests alternative routes to the station via Broomhill Road and Knoll Rise to Mayfield Avenue / Hillview Crescent and footpath to Station Approach could be significantly improved for inclusive mobility.
- 6.104 One respondent considered that there is enough connection to the station, the issue is the hills to the west, as these are challenging for most people. Respondent suggested provision of more frequent 'hop-on' buses.
- 6.105 Several respondents suggested relocating the pedestrian crossings at the war memorial roundabout to avoid congestion at the roundabout.
- 6.106 There was also a suggestion to replace the roundabout on the A224/Warren Road with traffic lights and redesigning the bus stop/cycle lane outside Orpington Station.
- 6.107 A local group welcomed the opportunity for appropriate development along Gravel Pit Way and active travel improvements to Priory Gardens, and suggested that Gravel Pit Way could become the primary car access road to town centre and parking to relieve the High Street, with through traffic directed via Spur Road.
- 6.108 One respondent suggests that Gravel Pit Way could be used to reduce traffic through the south High Street. It could facilitate the pedestrianisation of the south High Street,
- 6.109 Several respondents commented on train frequencies, with requests for sub-15 minute waiting times and a number of comments stating that fast trains to London, Kent and Hastings should be retained.

- 6.110 One respondent requested new Tram and Tube links to Croydon, questioning why should network rail have the monopoly. Another respondent suggested extending the Tram line from Beckenham to Orpington.
- 6.111 One respondent suggested a cable car/skyway to link the station and historic Crofton area to the eastern carpark and provide a real wow factor.
- 6.112 A local group suggested that the SPD should scope town centre public transport hub, and shuttle services between High Street and Orpington and St Mary Cray Stations, and better, more flexible services to rural villages and amenities, emerging developments such as at Fort Halstead, and links into Kent.
- 6.113 There were several negative comments regarding the new cycle lane to Orpington Station. One respondent noted that buses to Orpington Station can sometimes take 20 minutes due to the impact of new cycle lanes.
- 6.114 One respondent stated that there should be more pedestrian routes to the station away from the busy road to encourage more people to walk to the station.
- 6.115 Some respondents sought a commitment to increase electric vehicle charging points and the scrappage scheme for diesel cars before imposing ULEZ charges, and others advocated green public transport. One respondent specifically highlighted 20mph speed limits and the introduction of woonerf principles where streets are designed to be social spaces not just for vehicle use, whilst another raised concerns that a 'Living Streets' approach may funnel traffic down particular routes.
- 6.116 Several respondents raised the need for adequate EV charging points as part of new development. One respondent suggested that all the buses should be converted to electric.
- 6.117 TfL suggested referencing several of the London Plan policies in various parts of the SPD and also suggests adding 'transport' to planning obligations that may still be sought on specific schemes. TfL points included:
- Suggestion of specific reference to reducing car dominance in the town centre, as well as a requirement for new developments in the town centre to be car-free. They state that explicit reference to car free development is required in major town centres (London Plan Policy T6)
 - Amendment to the vision which adds that walking and cycling will be prioritised and traffic impacts on public spaces will be minimised.
 - Suggestion that the draft SPD also considers sustainable freight and deliveries and provides support for consolidation of deliveries and servicing to town centre businesses, in line with Policy T7 of the London Plan. TfL would welcome reference to Policy T7 Sustainable Freight.
 - Suggestion that the Council directly link sustainability and air quality with sustainable transport, as even with electric vehicles, reducing car trips and encouraging sustainable freight will improve air quality and reduce carbon emissions and embodied carbon in the transport network.
 - Consider measures to reduce car dominance and the creation of good quality cycle parking.
 - Reference to protection of bus movements on the High Street and Chislehurst Road as key bus corridors, and any redevelopment along these streets should seek to avoid and minimise negative impacts to bus operations, especially during construction.

Leisure centre

6.118 A significant number of respondents commented on the leisure centre, with many noting its importance as a community asset which provides important services to a diverse range of residents. A lot of respondents noted that the SPD has limited reference to the leisure centre and suggested additional guidance should be provided to help protect the leisure centre. Many respondents expressed concern that redevelopment would mean the leisure centre being closed for an indefinite period of time, perhaps permanently. Many note that the closure of the leisure centre will have adverse impacts on peoples physical and mental health and general wellbeing. Many would like to see its refurbishment rather than demolition.

6.119 Many of the responses relating to the leisure centre note that the new leisure centre must have facilities suitable for competitive swimming to enable swimming galas and other competitions to be held there.

6.120 The following points were suggested by respondents as part of comments related to the leisure. The points cover things respondents would like to see retained, suggestions for new and improved provision and general comments noting other concerns:

- Need a new leisure centre.
- Leisure centre should be the first thing to be completed as part of any redevelopment.
- Current leisure centre is tired, old fashioned, outdated and in need of modernisation.
- A refurbished leisure centre should be at the heart of the walnuts development.
- Refurbishment, not rebuild, would be cheaper and less disruptive.
- The existing pool could have a 25m boom.
- Leisure centre should be refurbished using CIL.
- Larger centre to meet demand from new residents.
- Larger swimming pool; needs to be a decent size not a paddling pool.
- Provision of large learner pool in addition to main pool.
- Retain 33m pool.
- Explore option of a 50m pool which would make Orpington a swimming hub for the southeast.
- Retain and improve soft play.
- Retain gym/hall facilities.
- Provide racquet sport facilities.
- Pool has a hoist and is used for GP referrals.
- Need for hydrotherapy facilities.
- Don't lose facilities for children and families.
- Include activity centre for children.
- Improvements aren't worth 3-5 years of closures.
- SPD should resist even a temporary loss of the pool.
- New pool should open before current one closes.
- Need a pool that allows the Ojays to hold Gala events with enough seating for spectators, and viewing gallery.
- Would like staff at the walnuts to retain their jobs.
- Would like to see a new larger multi-purpose leisure facility built before decommissioning the existing leisure centre so that there is no effective loss of swimming provision or impacts on competitive swimming.
- Need to consider alternative sites such as Goddington Dean to provide cohesive and joined-up provision across multi-sports, swimming and leisure.
- Area bound by Spur Road, Gravel Pit Way and Homefield Rise suggested as an alternative site.

- The Walnuts centre could be extended to about 8 storeys and the leisure centre could be in a basement part of that.
- Consider alternative provision during construction – examples given include use of St. Olaves Pool, provision of a temporary pool in the vicinity.
- Loss of the pool would destroy the Ojays swimming club.
- Loss of leisure facilities will have great impact on community health and wellbeing
- Leisure centre provides a sense of community and social life for older people.
- Loss of pool would have adverse impact on the economy.
- Need more parking provision for the leisure centre.
- Combining both housing and leisure will likely create many issues for any community, due to early and late open hours and the noise.
- No loss of changing facilities.
- Present centre lacks class facilities for certain areas, difficult to book some classes as in high demand, hence new centre should include improved facilities.
- A diving pool would attract more people.
- Suggested additions to leisure centre to attract families include escape room, inside putting, bowling alley, ice rink, children’s adventure playground, nursery, roller skating.
- Temporary ice rink and pallet park at r/o leisure centre had positive impacts.
- Leisure centre is currently in poor condition and there is an opportunity to improve this.
- The leisure centre should remain affordable and Council run.
- There should be a full consultation on the redevelopment of the leisure centre.
- There should be explicit mention of leisure centre in paragraphs 3.9 and 6.4 as a key parameter.
- A vital public asset like the leisure centre should be a separate planning issue and not dependent on development.
- A new leisure centre must comply with Policy 20 of the Local Plan i.e. no loss without alternative enhanced provision.
- Should be accessible to all residents and fully accessible for disabled people.
- Entrance could be more prominent from high street side.
- The leisure centre is no longer fit for purpose and has passed the point where refurbishment would be appropriate.

6.121 ‘Nuts to the Walnuts’ and another respondent note that no Council led independent public consultation about the future of the leisure centre or the Saxon Centre has been carried out. Relying on public feedback on planning applications or to the draft SPD is no substitute for a proper consultation. Considering the leisure centre is a public asset used by around 19,500 people each month and the Saxon Centre is a crucial community provision, a public consultation is vital. The group consider that the SPD should insist that any development which would impact on the leisure centre and the Saxon Centre be subject to a Council led independent public consultation taking place; and that the consultation should take place before any land deal is formally agreed with a developer, otherwise the consultation will be seriously compromised. This consultation should liaise closely with relevant user groups and follow Government principles for carrying out consultations - <https://www.gov.uk/government/publications/consultation-principles-guidance>. ‘Nuts to the Walnuts’ consider that the SPD should state that consultations should include the following options:

- the refurbishment of the existing leisure centre over time
- the building of a new leisure centre, next to the old one, before demolition
- the building of a new leisure centre, near the town centre, before demolition.

- 6.122 'Nuts to the Walnuts' state that the SPD should insist that developers give full details at the outset about how they will ensure that the town's leisure facilities will not be interrupted during construction.
- 6.123 'Nuts to the Walnuts' also consider that the SPD should insist that the Council follows the guidance set out in GN8 and insist on a retrofit approach in respect of the redevelopment of the leisure centre. They note that this is the option favoured by the overwhelming majority of this group's members in their Facebook poll – 87%.
- 6.124 'Nuts to the Walnuts' suggest that the Council should invest some of its own capital to refurbish the leisure centre to support its own 'retrofit first' approach.
- 6.125 Orpington 1st noted the importance of leisure uses as part of place shaping, stating that the leisure sector has huge advantages for the social wellbeing of residents and visitors, as well as an opportunity to realise commercial benefits. Orpington 1st fully support the opportunity for the redevelopment of the current provision and prioritising the expansion of the important leisure market. They would like to see a stronger message about retention of services within the town centre as the BID is strongly against any move to relocate the main leisure centre away from the town.

Housing inc. Affordable Housing

- 6.126 'Nuts to the Walnuts' commented on the number of flats that they considered suitable in the area, based on a Facebook survey. The group (and other respondents) considered that no more than 250 accommodations should be built in the centre of Orpington, with all quotas for social, accessible and affordable housing met by developers.
- 6.127 A number of respondents stated that there should be a mix of unit sizes, with gardens and parking. However, there are differing views on what the mix should be. For example, many note that 1 and 2 bed units do not meet need. One respondent stated that there are too many expensive retirement flats being built and we need affordable flats for the young of Orpington. One respondent stated that Orpington needs more houses, not flats and another stated they would like to see a mixture of maisonettes, low rise flats, small, terraced houses and some bigger homes for families.
- 6.128 One respondent suggested that any development should be sympathetic to the existing housing stock in the area and provide a mix of accommodation, with some having private gardens and close access to green areas.
- 6.129 A number of other respondents commented generally that too many homes are being proposed for the area, and this will result in overcrowding. One respondent states tension will become explosive given the mix of tenures living so close to each other.
- 6.130 Some respondents accept that there is space for some housing in the town centre, but others questioned why any housing was needed in the town centre at all. One respondent suggested that housing should be provided in out-of-centre locations with park and ride services introduced to enable access to the centre.
- 6.131 Conversely, some respondents noted the need for new homes, including affordable housing, small/medium sized family homes and keyworker housing.
- 6.132 One respondent disagrees that Orpington should have "medium" levels of residential growth on the basis of the London Plan – such matters should be local matters and not matters for the Mayor of London.

- 6.133 One respondent states that Orpington has met its housing target. Another respondent states that Orpington should not be responsible for meeting most of Bromley's housing quota. A few respondents make reference to the already permitted residential units / units under construction within the town centre which gives credence to reducing the proposed number of units.
- 6.134 TfL state that given the high PTAL in the Orpington Station and York Rise area, TfL would support higher density development commensurate with the excellent connectivity in this location.
- 6.135 A number of respondents state that housing density should be design led and focus on quality not quantity, Others suggested that housing should be low density.
- 6.136 Several respondents expressed concerns that new flats will end up being 'buy to let'.
- 6.137 Some respondents suggested that a proportion of new homes should be ringfenced for sale to local residents or UK residents. One notes that the sale of homes to overseas investors should be avoided.
- 6.138 Orpington 1st stated that businesses welcome an increase in the resident population and are appreciative of the economic and social benefit created by people living in the town centre. They fully support the mixed use of valuable space to create homes. They go on to note the need to attract younger customers who appreciate the advantages of living in a central location, and are keen to use facilities and support the town centre businesses, bringing further vibrancy, creativity, and economic benefit. This is particularly important given the town's aging population. Towns are for people, and they encourage and welcome new residents into the neighbourhood.
- 6.139 'Nuts to the Walnuts' and other respondents suggested that the Council investigate bringing vacant dwellings in Bromley back into use, to provide much needed homes ahead of approving mass building in Orpington town centre. One respondent suggests that the SPD should address the under occupation of housing and the need to downsize.
- 6.140 The presence of homeless people near Tesco was noted by one respondent who suggested that there should be assistance for them.
- 6.141 One respondent suggests looking for alternative sites for housing in the Green Belt. Another respondent stated that there are other areas away from Bromley where housing could be achieved. Releasing brownfield sites to allow people to live in houses with gardens was suggested.
- 6.142 'Nuts to the Walnuts' suggested that the SPD include the number of homes, including new homes built in each area for every year during the target period to date, 2019/20 – 2028/29. In this way Council members can judge the degree to which some areas are being over developed.
- 6.143 One respondent suggested there was potential for flats above shops on the High Street up to Priory Gardens, while another noted potential for further housing off the High Street.
- 6.144 Another respondent suggested limited housing development at northern end of the High Street in one way system might be suitable.
- 6.145 One respondent stated that the high street should focus on providing retail and leisure facilities with limited housing above shops. One respondent suggested that the empty shops could be redeveloped for housing or flats.

- 6.146 One respondent suggested that in Orpington West existing housing and public areas could be enhanced with newer built accommodation similar to Lewisham where the old housing was replaced with a very compact and useful regeneration sandwiched between the railway lines
- 6.147 A developer/landowner noted that, whilst draft Guidance Note 10 encourages developments to optimise site capacity this is balanced with a focus on quality of place over quantum of development. Developments, under Policy D3 (Optimising site capacity through the design-led approach) of the London Plan, should be design-led. It further outlines that the optimum development capacity of a site should be determined through applying a design-led approach. This is a step change from the previous London Plan which included a density matrix. This approach was considered too prescriptive and therefore the design-led approach allows for applications to determine this. As such, LBB must ensure that developments within the Borough and the Town Centre make the most efficient use of land and seek for density to be design-led rather than prescriptive and restrictive, especially given that the LBB cannot demonstrate a five year housing land supply. In light of this, the respondent requests that LBB review guidance note 10 to include reference to ensuring within sustainable locations, such as Town Centres and Opportunity Areas, density should be optimised. The current wording fails to align with the requirements of the NPPF, specifically paragraph 16, which requires plans to be prepared with the objective of contributing to the achievement of sustainable development. It also advocates the refusal of planning application that do not achieve sustainable development.
- 6.148 One respondent stated that densities should be reduced where possible to enable the greening and increase of public spaces and facilities as required elsewhere in this document. 'Optimise' does not mean dense high-rise buildings especially residential as this distorts and significantly changes the 'quality of place'

Environment and air quality

- 6.149 A number of respondents commented that sustainability, a changing climate and environmental impact should be at the heart of any plans and developments and sought an assessment of how the plan is compatible with these issues. This included homes built to last which offer good a lifestyle for residents. A number of sustainable features were suggested including:
- green roof/walls.
 - low carbon & passivhaus standards.
 - sustainable construction and materials.
 - sustainable drainage (SUDS),
 - tree planting & landscaping],
- 6.150 Orpington 1st consider that the retention of greenspace surrounding the town centre is a priority alongside the creation of additional spaces within the footprint of the town centre. They support the intensification of development with a town centre first policy to avoid the erosion of greenspace, and would like to see the Grade II listed Priory Gardens prioritised as an opportunity, to create a celebrated visitor attraction.
- 6.151 A comment from 'Nuts to the Walnuts' suggests that the SPD requires proposed developments to provide additional outdoor space for the wider community as well as private outdoor space for new residents.
- 6.152 A number of respondents raised the need for more open and green spaces, trees, planters, shrubs, flowers and planting in the town centre. Some respondents noted that additional development in the town centre will increase pressure for such space. One respondent felt that references to increasing green infrastructure could be more committal. Guidance note 7

for example - "should explore opportunities" - this needs to be stronger, mandatory unless there's an impossible barrier to it.

6.153 Many respondents highlighted the health benefits (mental and physical) which come with open space and opportunities to relax and / or exercise, commenting that more natural spaces would benefit the health and wellbeing of the community. Specific references made to the lessons from the pandemic, supporting the view that access to space, light and nature should be preserved (especially as more people work from home) and local facilities enhanced sensitively and sustainably

6.154 A local group suggested more greening on Station Road to help mitigate vehicle emissions. Other suggestions for new greening were put forward:

- Underused road space should be converted to public amenity space / parks (e.g. Alfred Place Gardens in the London Borough of Camden).
- Site Allocation 11 in the Eastern Edge Sub-Area and Site Allocation 12 in the Orpington Station and York Rise Sub-Area -SPD should state that green space and trees at both sites should be retained and improved.
- SPD should contain a policy to ensure any estate regeneration 'infill' schemes or new housing developments do not leave residents with inadequate provision of green and communal open space. A minimum equivalent of green space should be found to replace any which will be lost and more generally there should be a target provision of green space per person.

6.155 Some respondents suggested that greening is incorporated into new buildings, for example green balconies. Some respondents noted concern about the safety of roof gardens on tall buildings.

6.156 There was broad support for retrofitting with a number of respondents considered that the refurbishment of existing buildings instead of rebuild, with the aim of reducing carbon footprint and pollution, would be much more suitable and environmentally friendly suggesting in particular that the college, leisure centre and Saxon Centre all lend themselves to a retrofit-first approach to reduce impacts from existing embodied carbon (a cheaper and greener option). Some respondents suggested that there should be a stronger requirement for retrofitting.

6.157 Several respondents suggested that solar and district heating should be considered as part of new development.

6.158 A local group suggested that development in town centres and use of brownfield land should be prioritised so there is less pressure for development in the Green Belt.

6.159 A number of respondents noted the potential for an increase in air pollution as a result of new development and increased traffic; the potential impact of this increase was raised by several respondents, which included impacts on people with lung conditions. Other respondents specifically referenced the need to improve air quality through a reduction in motor traffic along the high street which would also enable a more reliable bus service. One respondent highlighted potential traffic issues suggesting that free flowing traffic is better than slow moving traffic whilst another raised concern regarding vehicles parked up on pavements with engines running, suggesting this should be penalised.

6.160 The Environment Agency noted that there is no reference to groundwater sensitivity and recommended that reference is made to ensuring water sources are not contaminated by polluting. They also recommended a reference to Local Plan Policy 118 as part of relevant policy and guidance for GN 8 to ensure that the prevention of controlled water. Another

representation highlighted that underground streams run through the area and raised concerns about potential sink holes (noting some have occurred in the area).

- 6.161 A local group noted that the ponds where the River Cray rises in Priory Gardens are designated a wetland SINCC. One respondent felt that the River Cray could be exposed to give riverside walks.
- 6.162 Several respondents noted that biodiversity must at the very least be maintained, raising concern about the potential impact of development on local wildlife / bird life and a variety of habitats – referencing colonies of bats, clans of badgers and Peregrine falcons nesting on top of the college (all protected in law). Other wildlife also referenced include at-risk amphibians, hedgehogs that require natural corridors, and pollinating insects which need native wildflowers. The impact of tall buildings on the flight paths of birds was also highlighted.
- 6.163 A respondent recommended that SPD Guidance note 14 should specifically reference that development should achieve at least 10% Biodiversity net gain.
- 6.164 A respondent suggested the enabling of wildlife areas which aren't overly curated, whilst another suggested a reduction in grass cutting. grass verges left to rewild and an end to the use of pesticides and herbicides.
- 6.165 A respondent suggested that numbers of Canada / Greylag geese at Priory Gardens should be controlled to allow a wider variety of smaller waterfowl to flourish. Also suggested areas be set aside for plants and flowers which would actively encourage more pollinators and wildlife.
- 6.166 A respondent felt that the Conservation area and should be protected as such for the wildlife, and another highlighted the desire for more natural ground covering.
- 6.167 The inefficiency of the housing stock (heating) was highlighted by respondents along with energy costs and fuel independence and security, and concerns for creating energy efficient living accommodation for new and existing residents.
- 6.168 Some respondents felt that new development should meet or exceed current energy efficiency standards and be carbon neutral in operation whilst another suggested that tower blocks in particular are proven to have greater impact on carbon emissions, as low/zero carbon development was not possible because costs of fire mitigation, raise build costs and solar panels would increase height.
- 6.169 Respondents suggested increased focus on local, low-cost power flagging wind farms, solar power and Small (Modular) Nuclear Reactors and geothermal heating project
- 6.170 Respondents raised concerns that 'Infrastructure Delivery' (paragraph 2.15) does not mention capacity to dispose of all water to meet the objective of improving the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised, noting that the torrential rain from recent storms flooded streets. A respondent highlighted that the High Street paving regularly floods and is uneven.
- 6.171 One respondent raised concerns in respect of paragraph 5.31 that overshadowing should not be addressed through carbon off-setting agreement.

Commercial uses (retail, leisure, office)

- 6.172 Orpington 1st stated that the employment opportunities provided by the town must be central in the consideration of new development. The links with Biggin Hill and the Cray Valley

Corridor should help shape and guide the type, size, and location of commercial premises. Light Engineering, Science and Technology, Aviation and its associated businesses, are all opportunities to provide Orpington with a further USP. Building the appropriate infrastructure to support business development in these sectors, and appropriate accommodation to attract staff, will be essential in bringing and sustaining economic growth to the area.

- 6.173 Orpington 1st stated that all new development should reference the current provision and mix of uses, and that, to function more affectively, the outdated and costly district system must be replaced with independent services. They also stated that improved digital infrastructure is a priority for existing as well as any new development.
- 6.174 Orpington 1st considered that much of the current portfolio of premises is unfit for purpose and needs replacing, but whilst the end use of commercial space is still being reviewed at a national level as well as local, future proofing capacity should be a requirement of planning. They added that High Street facing commercial units or spaces provide excellent visibility, access and improved security, so the relationship with the High Street should be a consideration in planning.
- 6.175 There was general concern regarding the loss of (fully functioning) units (in the now withdrawn planning application). A number of respondents note that the small units proposed won't attract large retailers. One respondent stated that the proposed retail units are too small and will drive larger retailers away and won't address the demand for retail in the area. Others state that the replacement shopping centre should include a range of unit sizes large enough to attract popular national retailers in addition to smaller units to attract independent retailers and small local start-ups.
- 6.176 One respondent questioned how the planned programme for the development addresses closure of existing business units and the consequential redundancies of those who work in them; and questioned whether the proposed replacement retail units would be more or less affordable for occupiers.
- 6.177 One respondent raised the potential impacts that the proposed development would have on the Odeon cinema.
- 6.178 A number of responses agree that the Walnuts shopping centre needs updating, however they do not agree with the current plans.
- 6.179 A significant number of responses stated the need for a stronger emphasis on retail and leisure uses. Some respondents noted the need to retain existing shops while others considered that the Town Centre needs better/decent/more variety of shops, in terms of the type of shop, the nature of ownership/operation (e.g. independent, family run) and also shop sizes (e.g. small shops). 'Nuts to the Walnuts' stated that the SPD should make it clear that if the Walnuts Shopping Centre is demolished new retail space should equal or exceed the floor area which has been lost. Another respondent suggested that there is continued need for an indoor shopping centre, whilst another questioned the need for an indoor mall.
- 6.180 One respondent highlighted that Orpington is a Major Town Centre and it should be unambiguous that residential use is a complementary function, not a primary one.
- 6.181 Some respondents were keen to see small interesting shops rather than large brand names, whilst others were keen to see large retailers encouraged to return. Many respondents were keen to see a mix of small, medium and large unit sizes / retailers, including units with the ability to convert/subdivide (adapt easily to change). One respondent noted that the bigger retailers can support the smaller shops and businesses.

6.182 Many respondents suggested particular named businesses or types of operators that should locate or remain in the Town Centre; this included:

- supermarkets
- restaurants
- clothes/fashion/designer shops
- shoe shops
- bingo halls
- gaming shop
- bookshops
- purveyors of everyday goods
- business (office) use
- department store
- craft shops
- independent shops
- shops selling local fresh produce
- local information centre
- community hubs
- somewhere to entertain teenagers, e.g. youth clubs
- local accessible shops for the elderly
- bowling alley
- ice rink
- outdoor gym
- performing arts centre
- children's adventure playground
- cinema
- butcher
- bakers
- greengrocers
- farmers market
- artisan businesses
- escape room
- inside putting
- fish monger
- record shop
- council offices so people can pay bills
- police station
- weekly market
- internet café
- outdoor café culture
- wine bar
- mini brewery
- gallery
- exhibition space
- events square
- antique shops
- pottery
- theatre
- citizens advice bureau
- job centre
- space for outside dining

- 6.183 Some respondents felt that more variety of uses would improve a perceived issue with vacancy rates. Other respondents suggested that the Town Centre looked tired and dated, and could do with a freshen up.
- 6.184 Some respondents noted that small local retail as a key part of the 'small Kent town' character of Orpington.
- 6.185 Conversely, many respondents identified particular types of retail or leisure use which should be limited, as they considered such uses were unnecessary or that there were too many of said uses currently located in the area. The particular uses identified included:
- food shops
 - cafes/restaurants
 - boutique shops
 - gambling/betting shops
 - charity shops
 - funeral parlours
 - nail bars
 - estate agents
- 6.186 Some respondents considered that the town centre did not need any further retail. One supported reducing the retail offer in replacement of leisure facilities. Another states that they are not against reducing the number of retail units and floor space in favour of housing and added that many retail units have storage space which is superfluous to the modern business model. One respondent considers the high street is too long with too many charity shops and empty units; they suggested concentrating retail between Tesco and the Walnuts to free up the northern end for housing.
- 6.187 One respondent considered that the Council should get rid of Tesco as it has ruined Orpington and closed lots of shops, whilst another notes that Tesco was huge but benefitted local residents.
- 6.188 Orpington 1st noted that the town has a rich history, including The Priory and Crofton Villa, which should both be celebrated and maintained to a high standard. Strong links to surrounding tourist attractions such as Down House and Biggin Hill Memorial Museum should be recognised as an economic opportunity, and planning should better reflect the town's position as a gateway for increasing tourism.
- 6.189 Orpington 1st also note the growth of festivals in Orpington which attract audiences from both in and out of borough. Planning should recognise the importance of these events and seek to support their growth, with suitable premises and infrastructure for theatre, art, and performance. Orpington 1st welcomes the new cultural focus of the council and would like to see more support given in the SPD to ensure that the town centre provision reflects the major town centre status of Orpington.
- 6.190 Some respondents raised the need for a decent market, including a suggestion for a permanent marketplace under a covered plaza.
- 6.191 Orpington 1st noted that the current market and event spaces are hidden from view, reducing the benefit of activation to the wider town centre businesses. New developments should improve permeability into the centre and provide additional outdoor spaces for community use.
- 6.192 Various respondents noted the need for more investment in the Town Centre and there was some suggestion of lowering business rates to encourage new businesses. One respondent

suggested that Bromley should invest its spare funds into the area and that empty shops should be refurbished. Another suggested that the Council should provide financial assistance offering low affordable rents and rates encouraging proprietors to Orpington.

- 6.193 Orpington 1st advocated the development of closer links with London South East Colleges to ensure that Enterprise, Catering and Hospitality, a key component of the college's provision, are further developed to support a circular economy. They noted that the town has a well-established hospitality sector which would benefit from additional leisure provision to complement it. As customer behaviour changes, and the requirement for traditional retail space diminishes, and the experience sector expands, appropriate and affordable premises to support this growth needs to be made available. They consider that larger units are often required to accommodate these emerging trends, so planning flexibility within spaces is essential.
- 6.194 Orpington 1st also support the opportunity to redevelop part of college premises for mixed use. High quality, flexible, and digitally advanced workspace - alongside conference facilities and student accommodation, would all contribute to the town's enterprise offer. One respondent stated that they would like Orpington to have an adult education program for adults.
- 6.195 Several respondents noted the need for better disabled access to shops.
- 6.196 A limited number of respondents suggested retaining the existing shopping centre as they liked shopping there.
- 6.197 A developer/landowner discouraged LBB from adopting the approach advocated in guidance note 17, i.e. utilising planning conditions to remove the provisions of Use Class E and to remove specific permitted development to protect the vitality and viability of the town centre rights. Whilst it is acknowledged that the LBB wish to prohibit the change of use away from certain uses which now fall within Use Class E, Use Class E was introduced to improve the viability and vitality of town centres and allow high streets and town centres to respond to the changing market demands. Restricting such ability for the high street and town centre to react to the changing needs of the local populations and furthermore market demand, would hinder the success of the town centre's regeneration and would impede the vitality and viability of Orpington. The respondent requests that this Note is reviewed to allow for flexibility of uses within Class E.
- 6.198 A number of responses make reference to the requirement of Local Plan Policy 92 to preserve and enhance active frontages.
- 6.199 One response noted the need for recognition that internet shopping will continue to increase.

Public realm, permeability and connectivity

- 6.200 Orpington 1st consider that clearly identified and funded management for the sustainability of public realm and public/private spaces is an essential component of good town centre planning. They note that the town requires improved infrastructure to accommodate both indoor and outdoor events; and that spaces should be designed with consideration for their end use, with appropriate services – electricity, water, hard standing, level ground, access, toilets - installed. Such spaces are lacking in the current Market Square and top terrace at the Walnuts Leisure Centre, compromising their use and hindering the ability of partners to activate the space without considerable additional cost and complicated logistics. Orpington 1st highlight that the positive benefits of well-designed and maintained public spaces are well documented for both businesses and residents, and state that they will continue to support the activation of these spaces, as it has done to great effect and for the benefit of the whole community over the last decade.

- 6.201 A developer/landowner supported guidance note 4 which requires development proposals to establish a clear hierarchy of permeable routes and spaces ensuring that new connections correspond with existing routes to promote greater ease of movement and improve wider connectivity.
- 6.202 Some respondents sought improved / additional green spaces connecting the southern end of the town to the Cray Valley. Others stressed the need to improve and link open spaces to residents, specifically improving environmental links, e.g. cycleways, walkways and promoting walking across Orpington with signposting (e.g. distance and time to destination). A respondent was pleased to see references to 'greening', pedestrian access and sympathetic good quality 'tidying up' of several parts of the whole area
- 6.203 A number of public realm issues were identified, with some respondents also suggesting public realm interventions/improvements to tackle these:
- Improving the environment of the High Street and making it a more pleasant place to spend time.
 - Street furniture / footpath width / paving & kerbs in Orpington high street difficult if using mobility equipment / with visual impairments.
 - The existing Walnuts car park not easily accessible to wheelchair users.
 - Need to improve accessibility of the village area.
 - Footbridge over Lych Gate Road is not accessible.
 - New paving around the Odeon cinema has been poorly installed.
 - Western Area existing flooring/paving should be remedied as this is uneven.
 - Lifts for the Walnuts car park are not accessible.
 - Proposed access to public toilets down narrow corridor (as part of now withdrawn planning application) is a challenge for those with disabilities.
 - The footpath heading Northwest from the station parallel to the tracks towards Petts Wood.
 - Better pathways along Gravel Pit Way with greenery and a crossing linking site 11 to Market Square with special consideration given to the impact on residents of Lancing Road and Spur Road of traffic.
 - Wider pavements and greenery along Station Road.
 - The pathway from the Knoll to the station should be improved and clearly signed
 - Improved signage and lighting across the town centre.
 - Integrate the war memorial into the surrounding area with pedestrianisation incorporating the war memorial providing space for local community.
 - A station square might enhance the Station setting.
 - The subway which runs under the station does not seem to appear on the map in the SPD. The subway is dark, infested with pigeons, and unpleasant to walk through. An upgrade to the subway would be a welcome improvement.
 - Improve kerbs (roundabout and high street / junction between Tubbenden Lane and Station Road) to improve safety and stop bus layout causing snarl up.
 - A residents association highlighted 3 particular pedestrian crossing areas to address:
 - High St / Knoll Rise junction
 - High St /Homefield Rise roundabout
 - Homefield Rise / Juglands Rd junction
- 6.204 Several respondents raised concerns about guidance regarding the aim for improved pedestrian permeability across the town centre, including guidance note 12 and figure 4 which some respondents assumed was a proposal to create actual new routes which would involve the demolition of existing homes.

- 6.205 Several respondents noted the importance of retaining and improving open spaces, particularly Market Square and the existing space outside the leisure centre. The pallet park outside the entrance to the Leisure Centre was highlighted as a good idea. Various respondents drew attention to the public realm outside the leisure centre entrance, which they considered should be replaced elsewhere if developed.
- 6.206 One respondent questioned guidance note 7 and how space 'above ground floor level' can be inclusively accessible. A podium space is likely to be only for the exclusive use of residents/occupiers of that development. Public space needs to be easily accessible, so this basically should be at ground level.
- 6.207 Several respondents questioned whether the town centre should be a place to dwell, as set out in the vision.
- 6.208 A respondent felt that the town centre was currently easy to navigate but would become problematic with increased density, courtyards, places and squares.
- 6.209 A local group suggested integrating performance space within public realm, giving the example of the Scoop at More London.
- 6.210 A local group noted the potential to reimagine Homefield Rise public realm, reconsidering roundabout at junction with Lych Gate Road.
- 6.211 Concern was raised by several respondents about the potential for increased late night disturbance related to increased connectivity, potentially making quiet streets busier, noisier and more dangerous, especially for children.
- 6.212 Orpington 1st fully support the ambition to develop Gravel Pit Way and utilise the underused sites along this busy access road. They would like to see the traffic flow anticipated and planned for in order to avoid some of the current challenges in this area. New developments should also ensure visitors to the town have a positive first experience. The hotel drop-off at the rear of Juglans Road is an example of where there has been no consideration for a welcoming and well managed access.
- 6.213 A local group suggested that the SPD provide guidance for improving rear of High Street properties facing Augustus Lane and Berwick Road service roads.
- 6.214 Some respondents raised the need for more seating in the town centre.
- 6.215 A respondent suggested that the SPD talks of placing benches in roads leading to and from the station (e.g. 'places to pause' referenced in paragraph 8.18) but considers this would be totally out of character for existing, quiet residential roads.
- 6.216 One respondent felt that routes to Priory Gardens should be traffic free and specifically recommended no electric scooters.
- 6.217 A local group considers that much more could, and should, be done within the public realm to define and enhance the local Conservation Areas. Metal posts in the High Street pavements as the road narrows barely nod to the Orpington Priory Conservation Area - the historic heart of the town. Another respondent suggested improving and increasing existing signage "wayfinding clues" as this would clearly direct pedestrians to the existing paths.
- 6.218 One respondent considered that the reference to legibility in paragraph 4.15 is fairly pointless. The respondent added that maintaining and cutting back vegetation to clear existing signs

would help legibility, we only need to add what is required and appropriate and we already have the War Memorial and the College Building as clearly identifiable landmarks.

6.219 TfL recommended additional references to

- Healthy Streets (London Plan Policy T2), including indicators, particularly when referencing improvements to the public realm - inclusion of measures to improve the environment for active travel on the high street'
- Legible London' programme is extended to Bromley and new developments provide 'Legible London' signage and connect into the existing programme

6.220 'Nuts to the Walnuts' consider that the SPD should prioritise accessibility when designing public spaces and considering street layout. It should state that street furniture should not cause difficulty for disabled people navigating the town's pavements, particularly for visually impaired people and wheelchair users. The SPD should also emphasise the necessity of accessible public transport to existing and future attractions and facilities. These points were echoed by several other respondents who noted the need for better design and access for disabled people including wheelchair users.

6.221 One respondent considered that a reduction in street furniture would be an improvement for pedestrian movement, as there are a lot of sandwich board outside shops and the High Street narrows and widens at various points.

6.222 'Nuts to the Walnuts' consider that the SPD should state Councillors will thoroughly scrutinise development applications and reject any plans which do not genuinely improve the public realm and create safe and clean spaces.

6.223 One respondent referred to paragraph 4.14 and noted that there is not much evidence of 'well-designed streets' in the area.

6.224 One respondent welcomed paragraph 4.16 but would like it to go further, suggesting that the development of north-south connections should be part of a larger scheme to enhance the Cray riverway this would extend the route from its current southerly terminus at the museum right through the town to the war memorial along a traffic free route, with ultimate aim of a continuous traffic free walking route from the war memorial via the London loop to the newly opened England coast path at Crayford.

6.225 Several respondents noted that previous pavement widening has caused issues as it has made the High Street too narrow for traffic, and that it should be widened to enable smooth running of traffic to assist retail trade.

6.226 Several residents note that the Crofton Road cycle lane is unacceptable, noting that most cyclists still use the road, and related public realm planting is not cared for which does not demonstrate pride in the area. One respondent the cycle way needs to be removed and should be paid for by the consultants that developed it as they have a residual liability. Another respondent commented generally about under-used cycle lanes and suggested that road access for cars should have priority over cycle lanes.

6.227 One respondent considered that Stanley Road, Cyril Road and Oatfield Road should remain 'dead-end roads' and that Broomhill Road should not be widened.

6.228 Some respondents suggested the need to refurbish the High Street and suggested measures to improve the look of the public realm, including floral displays and more hanging baskets. A couple of respondents considered the northern stretch of the High Street to be uninviting and shabby and the area feels unsafe and needing to be renovated.

General comments

6.229 In addition to the topics above, a number of general comments were raised:

- A number of respondents questioned the use of certain terms and in some cases suggested alternatives. Some respondents advocated the use of Plain English. One respondent suggested that a glossary should be provided.
- A respondent referred to paragraph 1.6 and considered that reference to overlapping documents means less clarity and more opportunity for the intent to be uniquely applied.
- A number of respondents questioned the need for the SPD and suggested that it had only been prepared to facilitate the delivery of a now withdrawn planning application, with some respondents suggesting that the developer of said application had input into the drafting of the SPD or funded its preparation.
- Many responses stated that they supported regeneration or development in principle, but noted a range of caveats particularly around building heights and the scale of development (which are detailed above).
- A significant number of responses were direct objections to a planning application for a large mixed-use development proposal on the Walnuts site (now withdrawn). Many responses criticised the level of engagement with residents by the applicant and the accuracy of the consultation materials that were provided. One respondent noted that the application had no consideration of the Equalities Act, and should not have progressed to an application. The council needs to review and reinforce the planning department as a result.
- One respondent noted support for the SPD and the intensification of development around the high street, and noted support for the planning application proposals.
- Orpington 1st welcomed the SPD, noting that it is a comprehensive document, and a much needed and long overdue guide which will help attract and support essential inward investment. Orpington 1st noted that development is taking place without any coordinated plan or cohesive vision, and implored the local authority to show leadership, steering with confidence the economic growth of the town; enabling, not preventing, new build, working collaboratively and efficiently to ensure the highest quality of design and delivery, and enabling creative solutions which support modern trading requirements and improved social cohesion.
- Orpington 1st acknowledge the benefits of being located on the border of Kent (the London-Kent Gateway) but are clear that Orpington is part of Greater London, one of only 32 Major Town Centres in the region, and suggest that the local authority support businesses in promoting the town as being part of London. They would like to see greater clarity and emphasis being put on the town's location to prevent the misconception that Orpington is a small town in Kent. They add that the correct positioning and status of the town should enable officers to take full advantage of the opportunities and funding streams made available from the GLA, which can have a direct and positive impact on business and the community at large.
- One respondent suggested that the policy framework section be amended to include reference to additional works including recent acts of parliament, building regulations, British standards and codes of practice.
- A respondent referred to paragraph 3.10 and suggested that local planning controls need to be established and enhanced to ensure the quality, standard, suitability and right mix of developments including conversions to HMOs.
- A local group suggesting extending the SPD area and Orpington BID area to the A224 Cray Avenue / Court Road to include the entirety of Priory Gardens, High Street and Carlton Parade. As the gateway to Orpington Town Centre, the approach from the A224 should be given due consideration in planning guidance.
- A local group considers that the SPD should help to create a green network connecting green spaces around the edges of the town centre and place the town centre at the heart

- of a 20-Minute Neighbourhood with the aims and objectives of creating a healthier, active, prosperous community. The group cites a number of sources in support of the idea.
- A number of respondents, including 'Nuts to the Walnuts', considered that the responses to a planning application for a large mixed-use development proposal on the Walnuts site should be considered as part of the SPD responses.
 - 'Nuts to the Walnuts' considered that Councillors and Officers should distinguish between positive regeneration plans which would enhance Orpington, and massive overbearing developments, which would not. The SPD should help Councillors and developers to do this by clearly setting out what is acceptable and what is not.
 - 'Nuts to the Walnuts' requested that the SPD state that Council Officers and Ward Councillors have a duty to liaise formally and regularly with residents regarding medium and large developments in the local area.
 - Some respondents raised concerns about the SPD consultation, including the following:
 - Criticism that the document link did not work.
 - Criticism about the lack of public engagement sessions either as face-to-face presentations or online.
 - 'Nuts to the Walnuts' recommended a variety of additional consultation techniques for future consultations by the Council and developers, including documents being made available in a variety of different formats and languages; and having a telephone answering service.
 - Lack of awareness of the consultation process and the opportunity to comment via Commonplace appears limited in duration especially given the context of the pandemic guidelines. This may have limited the quality and quantity of the feedback.
 - Need for a proper resident consultation with planning officers regarding what they would like to improve Orpington and not what is being proposed.
 - One respondent considered that the draft SPD and supporting SEA screening statement were poorly prepared and written and that neither should have been released for consultation at this level of preparation. Neither have a clearly identifiable reference number, revision number, author or checker listed. Neither appear to have been written to 'Plain or Crystal Mark' standards, and the resident is reliably informed that they are also not available in any other form: eg Brail (sic), other languages etc. The respondent also states that a reasonable ability to use computers seems to be required to access these documents and respond and from their experience of Orpington these resources may not be available to everyone.
 - One respondent raised the potential for 'rights to light' issues as a result of the development of new tall buildings.
 - One respondent wanted to see common sense and decency, and buildings erected with style.
 - Several respondents suggested that Orpington should stay the same as it is today, and considered that there should be no more development at all in the area, in order to maintain a nice quiet high street.
 - One respondent noted the need for a feeling of welcome and safety.
 - One respondent considered that paragraph 4.21 (relating to the Healthy principle) should include reference to lessons learned from Grenfell and COVID pandemic.
 - With reference to guidance note 6, it was suggested that fully independent peer review of all HIA reports should be included by a company which has been given prior approval by LBB DCC committee.
 - 'Nuts to the Walnuts' considered that development proposals should ensure adequate disabled only parking bays, thoughtfully placed to maximise accessibility; and that the SPD should state that planning applications must provide fully accessible lifts which accommodate all types of wheelchair and mobility scooter.

- TfL Commercial Development suggested including the redevelopment of Orpington Bus Station as a potential development opportunity, subject to any TfL operational requirements including bus-rail interchange being accommodated as appropriate.
- TfL state that they would be supportive of the redevelopment of the station car park and the introduction of a CPZ in the town centre and surrounding the station.
- 'Nuts to the Walnuts' suggest that the SPD should fully explore the potential of smaller sites away from the town centre with a view to dispersing development across the borough to accommodate families.
- A number of other respondents consider that there should be full public and club consultation of the needs of leisure and swimming facilities for Orpington and surrounding area, ahead of any planning decision regarding the pool.
- 'Nuts to the Walnuts' and several other respondents raised concerns about the financial robustness of developers (including a comment about a non-local non-British developer) and highlighted the risk of approved development not being completed and a new leisure centre not being delivered. 'Nuts to the Walnuts' consider that the SPD should state that a comprehensive financial risk assessment will be carried out before planning permission is granted to any developer undertaking large scale redevelopment projects in Orpington. Another respondent suggested that any development is phased to ensure that the leisure centre is completed prior to other development.
- One respondent criticised the lack of explanation of the vision for the Bromley Borough from the Local Plan of 2019 or how this has been aligned with in the draft SPD.
- One respondent considered that the vision should include Beckenham and Penge
- A developer/landowner with a land interest within the town centre was supportive of the underlying principles that the SPD seeks to deliver for the town centre; but considered that there are a number of Guidance Notes within the document that are unduly restrictive in the absence of a full evidence base. Further comments were provided in relation to several guidance notes, which are detailed in the relevant topic areas above.
- There were several suggestions for lower business rates.
- One respondent suggested that the SPD should seek to retain Lynwood House which is adjacent to Site 12.
- Several respondents noted support for further development and changes to the town centre and further investment.
- Several respondents suggested that redevelopment in the area would devalue properties.
- A local group suggested an amendment to celebrate connections with Eltham, Orpington's nearest Major Town Centre, as Seely and Paget, the architects of the former Orpington Library (adjoining The Priory) had previously created the controversial Art Deco extension to Eltham Palace.
- A local group suggest an amendment to paragraph 3.1 as the Priory is somewhat older than stated. The group also suggest that a reference is added to note that the River Cray rises in Priory Gardens.
- A respondent felt that the redevelopment of / around Gravel Pit Way should be one of the highest priorities, as it is an unattractive and under-utilised part of the town centre, whilst another felt that Gravel Pit Way cannot support the proposed development.
- A respondent stated that gentrification risks freezing out local people.
- A respondent felt infill developments should be avoided and others queried references to "Historic gaps" (in the SPD Vision), 'so-called' undeveloped or underdeveloped areas.
- Some respondents noted that the SPD has split Orpington into zones, but felt that consideration should be given to the impact of its decisions in one zone, on other zones, and the character areas should be treated as a coherent whole not developed in isolation from each other.
- One respondent queried why Carlton Parade is not considered part of the town, not least as it provides a focal point beyond the village.

Comments relating to Strategic Environmental Assessment (SEA)

- 6.230 The response from Historic England raises concern about guidance proposed for the 'Market Square, Orpington College & the Walnuts Shopping and Leisure Centre' sub-area. Historic England consider that the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan, allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings. They consider that the effects on designated heritage assets in close proximity need to be understood before any decision on the suitability of such development is made. Historic England consider that this approach would represent a plan-led approach to tall buildings and sustainable development as required by the NPPF (para 15) and London Plan policy D9, which would proactively look to conserve and enhance the historic environment.
- 6.231 Given these issues, Historic England consider that the draft SPD should be subject to a Strategic Environmental Assessment (SEA), which would enable proper understanding of the effects on heritage significance and the wider historic character, and help inform the design parameters in such a way as to avoid and/or mitigate them. It will also allow for better understanding of how such proposals relate to relevant planning policy in national, London-wide and local terms.
- 6.232 The Council has prepared a revised SEA Screening Statement to accompany the final SPD. This sets out our response to Historic England's comments about the requirement for an SEA. The Council is the responsible authority for determining whether an SEA is required for the SPD. To assist with this determination, the Council is required to consult specific bodies (including Historic England) identified in legislation, to gauge their views on whether an SEA is necessary; these views are not binding on the Council's decision.
- 6.233 Officers fundamentally disagree with Historic England about the need for an SEA. The comments are based on a misunderstanding of the role of the document. The guidance provided in the document relating to 'Development Opportunities' is not a site allocation – it is broad guidance which notes potentially suitable development height (based on officer judgement), and it defers to the need for detailed justification to address relevant policy requirements. This would include London Plan policy D9 which has specific consideration of heritage impacts. For the avoidance of doubt, the SPD has been amended to provide further clarity about the 'Development Opportunities'.
- 6.234 Regarding Historic England's view that the SPD is in effect creating new policy beyond that set out in the adopted Local Plan, it is noted that Policy 1 of the Local Plan identifies Orpington Town Centre as a broad location where additional large housing sites may come forward. The housing trajectory at Appendix 10.1 of the Local Plan attributes 125 units from this source of supply, although this quantum is not the result of detailed modelling and is not a cap, hence it does not preclude delivery of a greater quantum of housing. Other sources of supply from 'Broad Locations' set out in the Local Plan housing trajectory – changing retail patterns and Public Land Reorganisation – envisage delivery of almost 600 units and could in principle relate to Orpington Town Centre.
- 6.235 Another respondent raised issues with the SEA screening statement, disagreeing with the Council's assessment of seven points in Tables 1 and 2 of the SEA screening statement. The Council consider that these points are not relevant, and do not change the initial conclusion of the SEA screening statement, that an SEA is not required. A detailed response to each of the seven points raised is provided in the updated SEA screening statement.

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

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

'Nuts to the Walnuts' campaign group responses

7.2 As noted above, a number of 'Nuts to the Walnuts' template responses were received, which indicated support (or not) for eight specific issues. The response to these issues is set out in the section below, as part of Council's response to a range of issues raised by other consultation responses (as the same issues were raised by a number of respondents).

Issues raised by consultation responses

7.3 Tables 4 to 13 below set out how the Council have addressed the consultation comments raised in section 6 (paragraphs 6.8 to 6.235) when preparing the final SPD.

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

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

7.6 A significant number of responses proposed the creation of new policy. While a number of these responses raised relevant issues, unfortunately an SPD can only provide guidance to help implement existing policy, and it cannot introduce new policy. Therefore, no amendments were made in relation to these comments. The Council is currently reviewing the Bromley

Local Plan, and people are encouraged to respond to consultations on the emerging plan⁸ to shape the development of new policy.

- 7.7 There were also a lot of comments that referred to non-planning matters. While many of these comments raised legitimate points, they are outside the remit of the SPD and therefore no amendments were made in relation to these comments. However, where comments related to specific suggestions which could be relevant for other Council departments (e.g. transport), these suggestions have been forwarded to the relevant departments for information. While this does not provide any guarantee that these suggestions will be actioned, the relevant departments will now be aware of the comments and can consider them as part of their ongoing work (where appropriate).
- 7.8 A number of responses suggested minor changes to correct grammatical errors and typos (both actual and perceived). These have been amended where necessary.
- 7.9 There were some responses advocating the use of Plain English and a request to include a glossary. The SPD is a planning document, and while we have tried to make it as accessible as possible with regard to the terminology used, there will inevitably be significant use of technical terms and wording. A glossary is considered unnecessary as we consider that the meaning of the terms used is clear in the context of the document and will be understood by the expected users of the document (e.g. applicants, planning officers).

Table 4: Tall buildings, character

Response	How has response been addressed?
<p>Need to protect local character; new high density development will cause adverse impacts on character. Need to consider adjacent conservation area, local views of importance (including views not designated in the Local Plan) and potential for impacts on the Green Belt and nearby AONB.</p> <p>New buildings should respond to the height, scale, bulk and mass of existing buildings, was some support for sensible, proportionate development. Orpington should not become like other areas which have been ruined by the recent development of taller buildings.</p> <p>Conversely, one respondent considered the height of development in the town centre should not be unnecessarily restricted – particularly if it facilitates broader benefits; but providing that the architecture, design, and delivery are of the highest quality.</p> <p>A developer/landowner welcomed the guidance on the Walnuts and Market Square in the draft SPD, but noted concerns about some of the key parameters for development proposals in this area, namely that the SPD does not set out</p>	<p>Change – the Council agrees with the respondents regarding the importance of protecting local character and heritage assets. The SPD already reflects these important points, but further policy references have been added to emphasise this further.</p> <p>As set out in GN11, any tall building must address relevant policy requirements, which will include consideration of many of the issues raised by respondents.</p> <p>Where the SPD identifies building height, this has been informed by officer judgement taking into account the context (both in terms of the site and wider area) and consideration of relevant reference points and where taller elements can be suitably located. However, it is important to note that any heights are indicative and actual suitable heights would need to be determined on a case by case basis, assessed against relevant policy.</p> <p>The indicative heights are considered reasonable and appropriately justified. It is</p>

⁸ The latest information on the Local Plan review process is available on the Council's website - <https://www.bromley.gov.uk/planning-policy/review-bromley-local-plan>

Response	How has response been addressed?
<p>how the suggested height ranges and massing were established. Respondent considers that this lack of justification means the draft SPD is not 'sound'. In the absence of a proportionate evidence base, Guidance Note 11 should be revised to simply acknowledge the site is appropriate for tall buildings and that actual heights fall to be determined at planning application stage following completion of a full assessment considering all relevant criteria set out in London Plan Policy D9.</p> <p>The developer/landowner also commented on guidance provided for the Orpington West area, noting that whilst the high street is predominately characterised by 2-3 storeys this should not be a blanket approach when considering appropriate heights for this location.</p>	<p>noted that soundness tests do not apply to SPDs, as per paragraph 35 of the NPPF.</p>
<p>Tall buildings will not preserve or enhance the existing qualities of Orpington's town centre. They will block out light, change the skyline and are incompatible within such close proximity to the town's Conservations Areas. Building heights should therefore be capped, various suggestions for caps ranging from 1 to 9 storeys.</p>	<p>Change – we recognise that tall buildings may be more likely to cause adverse impacts (including those impacts raised by respondents). This makes the need for robust assessment of any tall building application extremely important. Further policy references have been added to the SPD to emphasise the need for detailed assessment of potential impacts.</p> <p>In response to the requests to cap building heights, we recognise the concerns that have informed these suggestions. There was a general consensus that buildings up to 9 storeys (the height of Brunswick House) would be suitable on the Walnuts site; this is consistent with the Council's view set out in the SPD that development of predominantly 3-9 storeys would be appropriate across the Walnuts site.</p> <p>The introduction of explicit caps on height would constitute new policy, and this is something that cannot be introduced in an SPD.</p> <p>The Local Plan has no restrictions on height anywhere in the borough; policy 47 is a criteria based policy, which means that applications are assessed against specific requirements on a case by case basis.</p>

Response	How has response been addressed?
<p>Additional wayfinding building not necessary as the Orpington College building already acts as a wayfinding building.</p>	<p>No change – the responses raise some relevant points regarding wayfinding, but we consider that the reference is appropriate and reflects adopted planning policy. Development at the Walnuts site is an opportunity to create a new focal point to improve legibility, although it is important to note that this alone would not justify a tall building – a range of other policy requirements would need to be addressed to justify a tall building.</p>
<p>Why do the Council consider that a 12-15 storey building is suitable on the Walnuts site, wouldn't this be contrary to the advice in national planning policy, GLA officers (as expressed in the GLA Stage 1 response to the planning application for the Walnuts site) and elsewhere in the SPD (paragraph 5.15, p26)?</p>	<p>Change –policy and guidance relating to the suitability of tall buildings is complex and the SPD seeks to clarify how these interact. It includes a number of references to relevant policy and guidance, and further references have now been introduced, including reference to national policy in the NPPF relating to the historic environment.</p> <p>A building up to 15 storeys in height would not, in principle, be contrary to national planning policy, GLA advice or paragraph 5.15 of the SPD. Suitability will ultimately come down to case by case assessment against relevant planning policy and guidance.</p> <p>National planning policy does not restrict tall buildings in principle. There are a number of national policy considerations that would apply to the determination of tall building application, but these mirror the policy requirements which are set out in the SPD.</p> <p>The GLA stage 1 report for the withdrawn application at the Walnuts site was commenting on a specific proposal for a range of tall buildings up to 19 storeys, hence it is not relevant to the SPD (which does not suggest a building of this height would potentially be suitable). Notwithstanding this, the report does not object to tall buildings in principle – the report summary notes: <i>Tall buildings on the site are considered acceptable in strategic terms, however their visual, environmental and cumulative impacts need further assessment.</i></p> <p>Paragraph 5.15 states that proposals will need to respond appropriately to the prevailing heights in the area. This does not mean that heights should be capped at the prevailing height level.</p>

Response	How has response been addressed?
<p>It is ambiguous whether the guidance for the Walnuts and the College site allows buildings of more than 15 storeys.</p>	<p>Change – a change has been made to provide further clarity in relation to this point.</p> <p>For clarity, the guidance considers that development of up to-15 storeys is appropriate but cannot rule out buildings of any height as there is no policy to prevent this.</p>
<p>A tall building at the Walnuts site will be a precedent used to justify tall buildings elsewhere in the town centre and elsewhere e.g. Derry Downs.</p>	<p>No change – we understand why this issue may cause concern, but we can confirm that all tall buildings will require site-specific justification, assessed against relevant policy and guidance. In the event a tall building is permitted at the Walnuts site, this would not automatically be relevant justification to justify further tall buildings.</p>
<p>Respondents raised concerns about various potential impacts that might result from new tall buildings, including microclimate, overshadowing and overlooking impacts, mental health impacts, accessibility and crime and ASB increases. Suggestion that then higher elements should be for commercial purposes as this is less intrusive in terms of overlooking. Several respondents suggested that tall buildings are not suitable for children. The expense of maintenance of tall buildings was highlighted. 'Nuts to the Walnuts' suggested requiring tall building applications to provide computer modelling to show the extent of certain impacts.</p> <p>Several respondents cited the London Assembly Planning & Regeneration Committee investigation on living in high rise buildings, to support comments on the adverse impacts of tall buildings.</p>	<p>Change – we agree that many of the potential impacts raised by respondents are important considerations that would need to be addressed as part of the assessment of any tall building application. The SPD already references relevant policy and guidance which would ensure that these issues are fully assessed where an application comes forward, but further policy references have been added to highlight additional policy and guidance relevant to the comments made by respondents.</p> <p>Issues such as health impacts and ASB/crime impacts may be relevant where there is evidence that impacts are likely to materialise, but there is no evidence to suggest that such impacts are an inevitable consequence of tall building applications.</p> <p>There is no in principle issue with families with children occupying tall buildings.</p> <p>Maintenance of tall buildings is a key consideration of London Plan policy D9.</p> <p>The cited London Assembly report is not policy and would not be material to a planning application or the preparation of the SPD.</p>
<p>A number of respondents raised issues relating to fire safety. Nuts to the Walnuts' consider that the SPD should state that all developers building high-rise homes will be contractually obliged to fund and carry out Personal Emergency Evacuation Plans (PEEPs) once</p>	<p>Change – fire safety is an important issue, and the Council agrees that it is important for tall building applications to fully address this issue.</p> <p>Some of the issues raised by respondents are covered by other regimes, particularly Building</p>

Response	How has response been addressed?
<p>residents have moved in. Other respondents noted concern about the lack of fire appliances to tackle fires in high-rise buildings, and the need to consult the London Fire Brigade on tall building applications. ‘Nuts to the Walnuts’ also consider that the SPD should state that developers must fully uphold several legal obligations, including the Fire Safety Order 2005, the Equality Act 2010, and the Human Rights Act 1998, as a condition of planning permission being granted.</p>	<p>Regulations. These regimes operate independently of planning, so it is not necessary to repeat their requirements in the SPD.</p> <p>The London Plan has a policy relating to fire safety, and the Mayor has recently consulted on a Fire Safety LPG. The Mayor’s policy and guidance includes requirements relating to evacuation strategies. Reference to the policy and draft LPG has been added to the SPD.</p>
<p>A developer/landowner objects to the reference to the use of red and buff brick on the High Street to inform new development in the area.</p>	<p>No change - the reference is considered appropriate, as it is a commonly used material, and its use could help to maintain local character.</p>
<p>A local group expressed concern about guidance note 9, considering that it does not appear to defend heritage assets in line with the Historic Environment Objectives set out in the Bromley Local Plan. The group also consider that guidance note 9 should further state that Visual Impact Assessments should be made from positions where the view is clear, and not obscured.</p> <p>The group reference London Plan policy GG2 (E), noting this is reflected in para 5.9 of the draft SPD, but does not appear to be reflected in Guidance Note 9. The group also suggest that the SPD should include stronger encouragement of a heritage centre / space / offering, which would be in keeping with London Plan policy GG1 (C). Since the museum was closed, and the Priory building closed to the public there has been no cultural offering in the town for low-income families, and this should be promoted in the SPD, consistent with Bromley Local Plan’s Historic Environment Objectives.</p> <p>Suggested wording was put forward related to these suggestions.</p>	<p>Change – the Council recognises the concerns relating to the historic environment. The SPD includes a number of references to relevant policy and guidance, and further references have now been introduced, including an amendment to GN11 to include reference to national policy in the NPPF relating to the historic environment.</p> <p>Guidance note 9 is considered appropriate and is aligned with the policy and objectives of the Local Plan.</p> <p>The Council’s validation requirements are already referenced in GN9; the validation requirements set out circumstances where a TVIA will be required, which includes developments that affect heritage assets. Technical requirements for TVIAs are also set out.</p>
<p>One respondent suggested GN7 require tall buildings to provide publicly accessible viewing terraces, and rooftop gardens, whilst another highlighted that green spaces on top of buildings are rarely accessible to the general public.</p>	<p>No change – the respondent raises a valid point regarding public accessibility. GN7 already references the potential for rooftop gardens. GN7 also refers to London Plan policy D9 which states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate.</p>

Table 5: Social infrastructure

Response	How has response been addressed?
<p>A number of respondents raised the issue of existing pressure on infrastructure, which could worsen as a result of new development. Responses noted that new development should ensure that impacts of various types of infrastructure will be mitigated, including through provision of new services. Suggestions for various different types of infrastructure were put forward.</p> <p>'Nuts to the Walnuts' and other respondents recommended that the SPD include facts about the capacity of the town's existing infrastructure and require developers to provide sum of money (additional to CIL) to pay for extra infrastructure.</p>	<p>Change – a number of valid concerns have been raised in terms of infrastructure provision and the need for new development to ensure that the capacity of local infrastructure is sufficient to support existing communities and new development.</p> <p>Bromley CIL has been adopted which is intended to cover general infrastructure requirements, securing contributions from individual schemes which can be used to fund new/improved infrastructure (as determined by the Council). If a proposal will cause site-specific impacts/pressures on infrastructure, there is potential to secure specific infrastructure or contributions toward new infrastructure.</p> <p>The updated Planning Obligations SPD sets out a range of requirements relating to infrastructure; reference to the updated Planning Obligations SPD has been added to the Orpington TC SPD.</p> <p>It is not necessary to set out information on infrastructure capacity in the SPD. Impacts on infrastructure are assessed case-by-case as provision may change over time and different applications will have different impacts.</p>
<p>A number of respondents stated the importance of retaining the Saxon day centre. Some comments suggested retaining the existing centre as is, while others were more open to replacement facilities in the area but were clear that any replacement facility must be operational prior to the existing centre closing.</p> <p>A local group suggested re-siting the Saxon Centre to Priory Gardens depot, with potential to expand health and wellbeing activities, create community garden, and benefit from access to formal gardens and green space.</p>	<p>Change – the Council agrees with the points raised by the respondents, and acknowledges that this was a gap in the draft SPD guidance. Further guidance has been provided in the SPD.</p>
<p>The NHS Healthy Urban Development Unit noted support for guidance notes 16 and 17 but suggested minor changes to guidance note 6 to impose a stronger requirement for Health</p>	<p>No change – the Council recognises that HIAs can be beneficial in terms of identifying and addressing health impacts of development. However, there is no Local Plan policy for HIAs, only the reference in Objective GG3 of the</p>

Response	How has response been addressed?
Impact Assessments to be submitted as part of planning applications.	London Plan. Therefore, it is not possible to introduce a stronger requirement as this would be creating new policy.
'Nuts to the Walnuts' consider that the SPD should clearly state the density of new housing which the existing infrastructure can realistically support. Developers should have clear and deliverable plans on how to expand the infrastructure if larger numbers of homes are proposed. Developers should also bear most of the cost of any expansion.	<p>Change – the respondent raises a valid issue in terms of the potential for increased pressure on infrastructure as a result of higher density development.</p> <p>With regard to the suggestion to clearly state density levels that can be supported, it would not be possible to quantify density in this way, and even if it was, the figures would fluctuate regularly and would likely be out of date very quickly. This could cause confusion.</p> <p>The Planning Obligations SPD sets out various infrastructure requirements for different types of development. Applicants are expected to provide justification to support development proposals, including information on how infrastructure requirements are addressed. Reference to the updated Planning Obligations SPD has been added to the Orpington TC SPD.</p>
'Nuts to the Walnuts' recommend that the Council consult the Metropolitan Police in relation to police provision.	<p>Change – the Council agrees that the Metropolitan Police Service are important consultees in relation to police provision and potential impacts on crime and ASB. We can confirm that the MPS were consulted on the SPD and are consulted on planning applications where necessary.</p> <p>Reference to the Urban Design Guide SPD has been added to the Orpington Town Centre SPD. The Urban Design Guide sets out guidance on designing out crime.</p>
Nuts to the Walnuts' and other respondents state that the SPD should make it clear that the College should remain an educational establishment and not be used for residential or any other purposes. One respondent suggested that any redevelopment of the college building should prioritise retrofit rather than demolition and rebuild.	<p>Change – the Council agrees that the college site should be retained in educational use, as this adds to the diversity of uses in the town centre, enhancing vitality and viability and providing important educational opportunities.</p> <p>The SPD cannot completely rule out change of use of the college site. The SPD notes the potential opportunity to enhance college provision; a further amendment is proposed to clarify that any loss of education provision would need to address both Local Plan policy</p>

Response	How has response been addressed?
	<p>20 and policy 27 which aims to limit loss of social infrastructure.</p> <p>The guidance for the college site does prioritise a retrofit first approach, although this cannot be mandated.</p>

Table 6: Heritage and design

Response	How has response been addressed?
<p>Historic England note concern about the development opportunities outlined in section 6 (Orpington East sub-area); they considered that these are not based on an appropriate evidence base and that potential effects on the historic environment have not been properly assessed, understood or avoided. In particular, they consider the identification of the Walnuts shopping centre as a suitable site for what would be in local terms a very tall building to be premature at this stage, and that the draft SPD is in effect allocating this site without any detailed assessment of the environmental effects of a 12-15 storey building and fails to adopt a plan-led approach to the location and appearance of tall buildings.</p> <p>This point is echoed by other respondents, as can be seen in the 'tall building' responses noted above.</p> <p>Historic England further note the indication at paragraph 1.3 that the preparation of the draft SPD for the town centre will inform the local plan review process. Should the allocation of the Walnuts shopping centre site and the design parameters at paragraph 6.4 be confirmed in the SPD and carried forward to the emerging local plan, they consider that it would not be possible for the Plan to be in conformity with national and regional planning policy as it relates to the historic environment.</p> <p>Historic England conclude that, in relation to the Walnuts site, the draft SPD is in effect creating new policy beyond that set out in the adopted Local Plan; and that, while this is potentially problematic in itself, the absence of evidence and assessment of potential effects also fails to</p>	<p>Change - Paragraphs 6.230-6.235 set out the Council's response to the comments regarding SEA. The revised SEA screening statement also sets out details on how the responses raised have been addressed.</p> <p>The SPD has been amended to clarify the role of the development opportunities identified in the SPD.</p>

Response	How has response been addressed?
<p>reflect the requirements of NPPF paras 31 and 190.</p> <p>Due to these concerns, Historic England consider that the SPD should be subject to an SEA to ensure that the development process would proactively look to conserve and enhance the historic environment.</p>	
<p>Historic England suggest that there is potential for a separate Archaeology SPD for the Town Centre, referring to an example in Sutton. They consider that this would mean that potential developers could determine with confidence the archaeological context of their site and whether it would require early consideration in the planning process.</p>	<p>Change – the Council agrees with Historic England regarding the importance of archaeology. We consider that an additional SPD for archaeology is not considered necessary, but a reference to the Urban Design Guide SPD has been added which reinforces the importance of archaeology in Bromley.</p>
<p>‘Nuts to the Walnuts’ request that the SPD states that the external appearance of developments are important and that quality materials should be used which not only comply with safety standards, but are also pleasing to the eye and are in keeping with the surrounding area. Other respondents suggested that design should conform to the architectural and cultural heritage to maintain Orpington’s traditional and historical setting. Some respondents referenced the need for beautiful development, citing the changes to the NPPF relating to beauty.</p>	<p>Change – the Council agrees with the respondent about the importance of external appearance and materials. This is covered by policies in the Local Plan and SPD guidance note 3.</p> <p>Reference to the Urban Design Guide SPD has been added to the SPD to provide a clearer link to the Council’s design expectations.</p>
<p>Contradiction between paragraph 5.12, p25; and paragraph 6.3, p35, relating to promotion of quantum over quality. The SPD should be clear that the focus is on quality of place, not the quantity of new development.</p>	<p>Change – the Council notes the comments and reasons for confusion, however, the statements are not considered to be contradictory, as it is possible to develop a significant quantum of new housing and commercial development through a design-led approach which optimises the site. The statement at paragraph 6.3 does not promote quantum over quality, it promotes quantum in line with the design-led approach set out in paragraph 5.12.</p> <p>To make the link with the design-led approach clearer, paragraph 6.3 has been amended.</p>
<p>Suggestion to extend the Priory conservation area</p>	<p>No change – the Council acknowledges the importance of the existing Priory Conservation Area as an important heritage asset, and this is reflected in the SPD. However, the SPD cannot extend the conservation area.</p>
<p>One respondent questioned a change in policy from Areas of Archaeological Significance to</p>	<p>Change – the Council acknowledges the potential for confusion between the different</p>

Response	How has response been addressed?
<p>Archaeological Priority Areas and felt that the SPD should be amended to refer to the draft Archaeological Priority Areas.</p>	<p>designations. Paragraph 3.25 has been amended to provide clarity on this issue.</p>
<p>A local group suggested that the disposal of and subsequent limited public access to the Priory despite its historic and cultural value to the town, and the moving of the museum to Central Library despite many of the artefacts originating from and relating to Orpington and its environs, has had a detrimental impact on the Town Centre's cultural offer. The group suggest that the SPD acknowledge the impact that the disposal has had on the town centre and local community. Another respondent suggested that the Priory should be preserved.</p> <p>Several respondents felt the opportunity should be taken to highlight various aspects of the history of the area.</p>	<p>No change – the Council acknowledges the importance of the area's history in assessing character. Section 3 refers to the area's history in broad terms, as part of establishing character. The role of the SPD is to set out planning guidance, so further references are considered unnecessary.</p>
<p>A respondent was concerned that the Crofton Villa area should be protected and not be over developed; another suggested no development 'by the Roman Villa'.</p>	<p>No change – the Council agrees that this area is an important heritage asset that should be protected. Section 8 of the SPD provides guidance which emphasises the importance of the Croton Roman Villa.</p>
<p>A developer/landowner considered that the requirement to ensure schemes are reviewed by an independent Design Review Panel will assist in ensuring that high quality development is brought forward in the town centre and as such, the requirement was supported.</p> <p>Other respondents made the following comments in respect of an independent Design Review Panel referred to in GN3:</p> <ul style="list-style-type: none"> • conclusions should be advisory only, and should not be given priority over local residents' views. • the panel should include a proportion of local residents. 	<p>No change – the Council agrees that the Design Review process can add significant value by improving the design quality of development proposals.</p> <p>Design Review Panel comments are always advisory – they provide non-binding, expert advice to officers and members. The Council makes planning decisions taking into account a range of views. There is no automatic priority of such views, the relevance and weight given depends on the quality of the response and whether it raises valid planning issues.</p> <p>DRPs are run as an independent, expert function, in order to give appropriate design advice to inform the development of planning applications and achieve high quality design. It would not be appropriate for local residents to sit on the DRP as it would undermine the independent nature of the advice.</p>
<p>A respondent raised concern about the lack of reference to Secured by Design (SBD), noting that safety and security measures can be included in the design and layout of buildings</p>	<p>Change – the Council agrees that the design of development proposals should consider issues of safety and security from the outset.</p>

Response	How has response been addressed?
and public areas, keeping residents, workers and visitors safe.	Reference to the Urban Design Guide SPD has been added. This document sets out detailed guidance on designing out crime which addresses the issues raised.

Table 7: Transport

Response	How has response been addressed?
<p>There was support and objections to the principle of car-free development. A number of respondents noted the need to protect existing parking provision and the need for more parking, including better disabled parking.</p> <p>A number of respondents suggested that the PTAL rating of 4 (moderate) in the area of the Walnuts should be stated in the SPD. One suggests that the PTAL for each character area is highlighted, and that the Council ensure the correct parking allocation in applications.</p> <p>Some respondents sought a commitment to increase electric vehicle charging points.</p>	<p>No change – the Council notes the range of comments received regarding parking provision.</p> <p>The SPD reflects parking policy set out in the London Plan, including policy relating to EV charging points; it cannot introduce new policy.</p> <p>The London Plan parking standard for Major Town Centres would be the relevant parking standard for Orpington; this sets out a requirement for car-free development.</p> <p>PTAL ratings can vary across character areas and individual sites. It would not be appropriate or necessary to state PTAL ratings in the SPD. Where necessary, PTAL ratings can be checked using the TfL WebCAT tool - https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</p>
<p>There were a number of comments relating to sustainable transport. Some comments suggested that the SPD should be more ambitious in promoting walking, cycling and public transport including supporting better walking, cycling, bus and rail infrastructure. There were various suggestions for new sustainable transport infrastructure. Potential improvement of specific routes within and at the edge of the town centre was mentioned by a number of respondents.</p> <p>Several respondents suggested that proposed new cycle lanes must be subject to consultation. There were several negative comments regarding the new cycle lane to Orpington Station. One respondent noted that buses to Orpington Station can sometimes take</p>	<p>Change – the Council notes the suggestions put forward for new routes and infrastructure. These suggestions have been passed to the relevant Council department for information.</p> <p>The SPD does highlight the importance of walking, cycling and public transport, and supports further opportunities for active travel as part of the ‘connected’ design principle. The SPD vision has been amended to reflect comments from TfL (using the term minimised not mitigated).</p> <p>The SPD references the updated Planning Obligations SPD which sets out requirements for obligations to secure transport network improvements and improved sustainable transport measures. Specific reference to transport planning obligations has been added</p>

Response	How has response been addressed?
<p>20 minutes due to the impact of new cycle lanes.</p> <p>TfL suggested an amendment to the vision which adds that walking and cycling will be prioritised and traffic impacts on public spaces will be minimised.</p> <p>A local group considered that the main approaches to the High Street create severance and are often barriers to active travel, e.g. A223 Sevenoaks Road, A232 Station Road / Spur Road, A224 Cray Avenue / Court Road, due to volume and speed of vehicles. The group suggested that a 20 mph speed limit should be extended from High Street to cover surrounding areas where residents live unless there are segregated/protected footways and cycleways.</p>	<p>to paragraph 2.19 to highlight the importance of these measures.</p>
<p>Orpington 1st noted that the transport links to London are a major attraction for businesses and residents locating or relocating to the town centre; they fully support a vision to continue to improve the station as a transport hub with associated infrastructure, so it is a vibrant and welcome access point that can integrate more effectively with the surrounding area and town centre. There should be opportunities to expand and modernise the site with additional associated businesses, and services that complement the transport hub.</p>	<p>No change – the Council agrees with the respondent about the importance of strong transport links. The SPD sets out support for such opportunities in paragraph 8.17.</p>
<p>Several respondents suggested that the High Street should be fully or partially pedestrianised, some recognising that it would need careful consultation with the residents who would be affected, while a number of others objected to the idea of pedestrianisation entirely.</p>	<p>No change – the Council notes the comments relating to pedestrianisation, and that there is no consensus for or against such schemes. The SPD supports improvements to sustainable transport but cannot mandate pedestrianisation even if this was considered appropriate. The suggestions have been passed to the relevant Council department for information.</p>

Table 8: Leisure centre

Response	How has response been addressed?
<p>A significant number of respondents commented on the leisure centre, with many noting its importance as a community asset which provides important services to a diverse range of residents. A lot of respondents noted that the SPD has limited reference to the leisure centre and suggested additional guidance should be provided to help protect the leisure centre.</p> <p>A lot of suggestions were put forward covering things respondents would like to see retained, suggestions for new and improved provision and general comments noting other concerns.</p> <p>'Nuts to the Walnuts' state that the SPD should insist that developers give full details at the outset about how they will ensure that the town's leisure facilities will not be interrupted during construction.</p>	<p>Change – the Council agrees with the points raised by the respondents, and acknowledges that this was a gap in the draft SPD guidance.</p> <p>The SPD has been amended to include detailed guidance on the leisure centre, in line with policy 20 of the Local Plan.</p> <p>The Council thanks respondents for the suggestions for new and improved leisure centre facilities. The suggestions have been passed to the relevant Council department for information.</p>
<p>'Nut to the Walnuts' and other respondents consider that the SPD should insist that any development which would impact on the leisure centre (and the Saxon Centre) be subject to a Council led independent public consultation taking place; and that the consultation should take place before any land deal is formally agreed with a developer, otherwise the consultation will be seriously compromised. This consultation should liaise closely with relevant user groups and follow Government principles for carrying out consultations.</p> <p>'Nuts to the Walnuts' consider that the SPD should state that consultations should include the following options:</p> <ul style="list-style-type: none"> • the refurbishment of the existing leisure centre over time • the building of a new leisure centre, next to the old one, before demolition • the building of a new leisure centre, near the town centre, before demolition. 	<p>Change – the Council recognises the importance of community engagement on redevelopment proposals. The SPD cannot set out a general requirement for such consultation, but the Council note that an extensive consultation exercise has recently been undertaken to shape proposals for the Walnuts leisure centre – https://www.bromley.gov.uk/news/article/461/views-are-being-sought-about-improving-the-walnuts-and-west-wickham-leisure-centres</p> <p>Relevant planning consultation procedures would apply to any planning application involving redevelopment of the leisure centre.</p> <p>The SPD has been amended to include further guidance on the leisure centre, which states that retention of the leisure centre in the town centre would be the preferred option given the importance of the leisure centre to the town centre offer.</p> <p>With regard to the Saxon day centre, further guidance has been provided in the SPD, as noted in table 5 above.</p>
<p>'Nuts to the Walnuts' also consider that the SPD should insist that the Council follows the guidance set out in GN8 and insist on a</p>	<p>Change – the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p>

Response	How has response been addressed?
retrofit approach in respect of the redevelopment of the leisure centre.	Detailed guidance has been provided for the leisure centre, and GN8 would also apply to redevelopment of the leisure centre.
Orpington 1 st would like to see a stronger message about retention of services within the town centre as the BID is strongly against any move to relocate the main leisure centre away from the town.	Change – the Council acknowledge the importance of the leisure centre to the town centre. The SPD has been amended to include reference to benefits of retaining the leisure centre within the town centre.

Table 9: Housing inc. Affordable Housing

Response	How has response been addressed?
<p>Nuts to the Walnuts' commented on the number of flats that they considered suitable in the area, based on a Facebook survey. The group (and other respondents) considered that no more than 250 accommodations should be built in the centre of Orpington, with all quotas for social, accessible and affordable housing met by developers.</p> <p>Some respondents accept that there is space for some housing in the town centre, but others questioned why any housing was needed in the town centre at all.</p> <p>A number of other respondents commented generally that too many homes are being proposed for the area, and this will result in overcrowding.</p> <p>One respondent suggests looking for alternative sites for housing in the Green Belt. Another respondent stated that there are other areas away from Bromley where housing could be achieved. Releasing brownfield sites to allow people to live in houses with gardens was suggested.</p> <p>One respondent states that Orpington has met its housing target. Another respondent states that Orpington should not be responsible for meeting most of Bromley's housing quota. A few respondents make reference to the already permitted residential units / units under construction within the town centre which</p>	<p>No change – the Council recognises the issues raised with regard to housing in town centres, and understands the concerns raised about the scale of housing development and the potential impacts this may have; with regard to additional infrastructure pressures, the responses in table 5 set out what the SPD and other documents can do to ensure sufficient infrastructure is in place.</p> <p>The borough housing targets are not disaggregated to specific areas, and there is no cap on housing in any areas. In town centres, housing is suitable in principle.</p> <p>Policy relating to affordable housing and accessible housing applies to all relevant developments, as set out in Local Plan and London Plan. There is no need to repeat this in the SPD.</p> <p>The London Plan identifies Orpington town centre as having 'medium' residential growth potential. This is adopted Development Plan policy prepared by the Mayor of London and the SPD cannot change this. It is noted that the Bromley Local Plan also supports residential development in town centres.</p>

Response	How has response been addressed?
<p>gives credence to reducing the proposed number of units.</p> <p>One respondent disagrees that Orpington should have “medium” levels of residential growth on the basis of the London Plan – such matters should be local matters and not matters for the Mayor of London.</p> <p>Orpington 1st stated that businesses welcome an increase in the resident population and are appreciative of the economic and social benefit created by people living in the town centre.</p>	
<p>One respondent suggested there was potential for flats above shops on the High Street up to Priory Gardens, while another noted potential for further housing off the High Street.</p> <p>Another respondent suggested limited housing development at northern end of the High Street in one way system might be suitable.</p> <p>One respondent stated that the high street should focus on providing retail and leisure facilities with limited housing above shops. One respondent suggested that the empty shops could be redeveloped for housing or flats.</p>	<p>No change – the suggested locations for housing all have merit and would be supported by the SPD. In particular, the SPD guidance for the Orpington North and Orpington West character areas states that residential uses on upper floors may be appropriate.</p>
<p>A number of respondents stated that there should be a mix of unit sizes, with gardens and parking. However, there are differing views on what the mix should be. For example, many note that 1 and 2 bed units do not meet need. One respondent stated that there are too many expensive retirement flats being built and we need affordable flats for the young of Orpington. One respondent stated that Orpington needs more houses, not flats and another stated they would like to see a mixture of maisonettes, low rise flats, small terraced houses and some bigger homes for families.</p> <p>Some respondents noted the need for new homes, including affordable housing, small/medium sized family homes and keyworker housing.</p>	<p>No change – the Council strongly agrees that provision of affordable housing is important where new housing is developed in the town centre. The size and type of units is also important to ensure that a range of housing need is met.</p> <p>Policy relating to affordable housing, housing size mix and housing typologies are set out in the Local Plan and London Plan. There is no need to repeat this in the SPD.</p> <p>We note the desire to develop houses from some respondents. Houses are an acceptable type of housing development but equally, flats are also suitable in principle.</p>
<p>TfL state that given the high PTAL in the Orpington Station and York Rise area, TfL would support higher density development</p>	<p>No change – The Council notes that these locations could, in principle, be acceptable locations for new housing, but, in the absence of</p>

Response	How has response been addressed?
<p>commensurate with the excellent connectivity in this location.</p> <p>One respondent suggested that in Orpington West existing housing and public areas could be enhanced with newer built accommodation similar to Lewisham where the old housing was replaced with a very compact and useful regeneration sandwiched between the railway lines</p>	<p>any firm proposals, it is not considered necessary to add reference in the SPD. The Council is currently reviewing the Local Plan, which might be a more appropriate avenue to promote proposals.</p>
<p>A number of respondents state that housing density should be design led and focus on quality not quantity, Others suggested that housing should be low density.</p>	<p>Change – the Council agrees that new development should be design-led. Policy D3 of the London Plan sets out the design-led approach and seeks to optimise the capacity of sites. Optimise means promoting quality <u>and</u> quantum, ensuring that the form of development is the most appropriate for the site and land uses meet identified needs. An approach which promoted quantum over quality (i.e. maximising) would not be consistent with policy.</p> <p>The SPD sets out guidance in line with policy D3 and other relevant policy relating to design. A reference to the Urban Design Guide SPD has also been added.</p>
<p>'Nuts to the Walnuts' and other respondents suggested that the Council investigates bringing vacant dwellings in Bromley back into use, to provide much needed homes ahead of approving mass building in Orpington town centre. One respondent suggests that the SPD should address the under occupation of housing and the need to downsize.</p>	<p>No change – the Council agrees that bringing vacant dwellings back into use is important as it ensures best use of housing stock. Although this issue is not relevant for the SPD, the Council does have active workstreams to address empty properties – https://www.bromley.gov.uk/empty-properties/empty-properties-1</p>
<p>'Nuts to the Walnuts' suggested that the SPD include the number of homes, including new homes built in each area for every year during the target period to date, 2019/20 – 2028/29. In this way Council members can judge the degree to which some areas are being over developed.</p>	<p>No change – monitoring borough-wide housing completions is important as it is a key factor for determining whether the Council meets the annual housing delivery test. However, the borough housing targets are not disaggregated to specific areas, and there is no cap on housing in any areas; the comment infers that applications could be refused on the basis of over-development against targets, but this would not be the case.</p> <p>There would also be practical difficulties given that the SPD is not a live document and it would only be able to set out known completions at the date of adoption.</p>

Response	How has response been addressed?
	<p>Housing completion figures can be accessed through other sources. The GLA provide live tables on housing statistics including a heatmap which visualises the location of completed development - https://data.london.gov.uk/dataset/residential-completions-dashboard - and the Council publishes figures as part of the Authority Monitoring Report- https://www.bromley.gov.uk/planning-policy/authority-monitoring-reports-housing-trajectory.</p>
<p>A developer/landowner requests that LBB review guidance note 10 to include reference to ensuring within sustainable locations, such as Town Centres and Opportunity Areas, density should be optimised. The current wording fails to align with the requirements of the NPPF, specifically paragraph 16, which requires plans to be prepared with the objective of contributing to the achievement of sustainable development. It also advocates the refusal of planning application that do not achieve sustainable development.</p>	<p>Change - GN10 refers to London Plan policy D3, which seeks optimisation of sites. The respondent appears to confuse optimise with maximise, as they seem to suggest that it is development quantum that should take priority; such an approach is not supported by policy.</p> <p>To make the link with the design-led approach clearer, paragraph 6.3 has been amended to include an additional reference.</p>

Table 10: Environment and air quality

Response	How has response been addressed?
<p>A number of respondents commented that sustainability, a changing climate and environmental impact should be at the heart of any plans and developments and sought an assessment of how the plan is compatible with these issues. A number of sustainable features were suggested for inclusion in the SPD.</p>	<p>Change – the Council acknowledges the importance of ensuring that new development is designed to be sustainable. The SPD has a specific ‘sustainable’ design principle which reflects a number of issues raised by respondents. The principle also refers to relevant Development Plan policies which cover these issues.</p> <p>A reference to the Urban Design Guide SPD has also been added; this document includes further detailed guidance on sustainable design.</p>
<p>Orpington 1st consider that the retention of greenspace surrounding the town centre is a priority alongside the creation of additional spaces within the footprint of the town centre. They support the intensification of development with a town centre first policy to avoid the erosion of greenspace, and would like to see the Grade II listed Priory</p>	<p>Change - the Council notes the suggestions put forward for new green features. These suggestions have been passed to the relevant Council department for information.</p> <p>The Council agrees with the respondents on the importance of green and open space. The SPD sets out the importance of green infrastructure,</p>

Response	How has response been addressed?
<p>Gardens prioritised as an opportunity, to create a celebrated visitor attraction.</p> <p>A comment from 'Nuts to the Walnuts' suggests that the SPD requires proposed developments to provide additional outdoor space for the wider community as well as private outdoor space for new residents.</p> <p>A number of respondents raised the need for more open and green spaces, trees, planters, shrubs, flowers and planting in the town centre. Some respondents noted that additional development in the town centre will increase pressure for such space. One respondent felt that references to increasing green infrastructure could be more committal. Guidance note 7 for example "should explore opportunities" - this needs to be stronger, mandatory unless there's an impossible barrier to it.</p> <p>A local group suggested more greening on Station Road to help mitigate vehicle emissions. Other suggestions for new greening were put forward, including suggestions for converting unused road space and incorporating greening into new buildings.</p>	<p>including reference to the importance of Priory Gardens as a space for residents, businesses and visitors.</p> <p>Requirements for new outdoor open space are set out in the Local Plan and Planning Obligations SPD. The SPD already references the Planning Obligations document, but this has been amended to refer specifically to green infrastructure and open space.</p> <p>Where appropriate, guidance in the SPD does refer to the importance of securing new public realm and green space.</p> <p>An additional reference to the London Plan 'urban greening factor' policy has been added to section 2 to highlight the importance of new greening.</p>
<p>There was broad support for retrofitting with a number of respondents considered that the refurbishment of existing buildings instead of rebuild, with the aim of reducing carbon footprint and pollution, would be much more suitable and environmentally friendly suggesting in particular that the college, leisure centre and Saxon Centre all lend themselves to a retrofit-first approach to reduce impacts from existing embodied carbon (a cheaper and greener option). Some respondents suggested that there should be a stronger requirement for retrofitting.</p>	<p>Change – the Council agrees that retrofit can have benefits, but this approach cannot be mandated for all applications.</p> <p>Detailed guidance has been provided for the leisure centre and Saxon day centre, and GN8 would also apply to any redevelopment of these facilities</p> <p>The SPD notes that the college building maybe appropriate for a retrofit approach.</p>
<p>Several respondents suggested that solar and district heating should be considered as part of new development.</p> <p>Some respondents felt that new development should meet or exceed current</p>	<p>No change – the Council agrees that renewable energy and energy efficiency are important considerations. These issues would be covered by relevant Development Plan policy, including the London Plan energy hierarchy. It is not necessary to repeat these policies in the SPD.</p>

Response	How has response been addressed?
energy efficiency standards and be carbon neutral in operation.	
A number of respondents noted the potential for an increase in air pollution as a result of new development and increased traffic.	No change – the Council agrees that consideration of the impacts of new development on air quality is important. Development Plan policies on air quality would apply to relevant development proposals. It is not necessary to repeat these policies in the SPD.
The Environment Agency noted that there is no reference to groundwater sensitivity and recommended that reference is made to ensuring water sources are not contaminated by polluting.	Change – the SPD has been amended to add requested reference.
<p>Several respondents noted that biodiversity must at the very least be maintained, raising concern about the potential impact of development on local wildlife / bird life and a variety of habitats – referencing colonies of bats, clans of badgers and Peregrine falcons nesting on top of the college (all protected in law). Other wildlife also referenced include at-risk amphibians, hedgehogs that require natural corridors, and pollinating insects which need native wildflowers. The impact of tall buildings on the flight paths of birds was also highlighted.</p> <p>A respondent recommended that SPD Guidance note 14 should specifically reference that development should achieve at least 10% Biodiversity net gain.</p>	<p>Change – the Council agrees with the respondents about the importance of biodiversity. The SPD refers to the importance of biodiversity, and relevant Development Plan policies would apply to development proposals. However, some of the suggestions would constitute new policy which is beyond the remit of the SPD.</p> <p>Reference to the Urban Design Guide SPD has been added to the SPD; this document includes a section on biodiversity.</p>
Respondents raised concerns that 'Infrastructure Delivery' (paragraph 2.15) does not mention capacity to dispose of all water to meet the objective of improving the resilience of buildings and places to cope with a changing climate, ensuring flood risk is managed and potential problems of extreme weather are minimised, noting that the torrential rain from recent storms flooded streets.	No change – the Council agrees that flood risk is an important issue. Flood risk implications would be a relevant consideration for certain development proposals, in line with Development Plan policy including Local Plan policy 115. It is not necessary to repeat these policies in the SPD.
One respondent raised concerns in respect of paragraph 5.31 that overshadowing should not be addressed through carbon off-setting agreement.	No change – the Council agrees that on-site carbon reduction measures should be prioritised. This requirement is set out in London Plan policy, which states that carbon offsetting contributions are only acceptable where it is clearly demonstrated that the zero-carbon target cannot

Response	How has response been addressed?
	be fully achieved on-site. It is not necessary to repeat these policies in the SPD.

Table 11: Commercial uses (retail, leisure, office)

Response	How has response been addressed?
Orpington 1 st stated that the employment opportunities provided by the town must be central in the consideration of new development.	Change – the Council agrees that continued focus on a range of employment uses is important to ensure the ongoing vitality and viability of the town centre. The importance of commercial development is set out throughout the SPD, including as part of mixed-use development. Some additional references have been added, including to guidance for the Walnuts Shopping Centre site in section 6.
Orpington 1 st considered that much of the current portfolio of premises is unfit for purpose and needs replacing, but whilst the end use of commercial space is still being reviewed at a national level as well as local, future proofing capacity should be a requirement of planning. They added that High Street facing commercial units or spaces provide excellent visibility, access and improved security, so the relationship with the High Street should be a consideration in planning.	Change – the Council recognises the issue and the importance of ensuring retail space is fit for purpose. Local Plan policy 92 would cover these issues, and it is not necessary to repeat this in the SPD. However, guidance for the Walnuts Shopping Centre site has been updated to reference to the need to investigate a range of commercial unit sizes. Future retail policy will be considered as part of the ongoing Local Plan review.
There was general concern regarding the loss of (fully functioning) units (in the now withdrawn planning application). A number of respondents note that the small units proposed won't attract large retailers. One respondent stated that the proposed retail units are too small and will drive larger retailers away and won't address the demand for retail in the area. Others state that the replacement shopping centre should include a range of unit sizes large enough to attract popular national retailers, in addition to smaller units to attract independent retailers and small local start-ups.	Change – the Council agrees that provision of a range of retail unit sizes is important to ensure a functioning town centre. A range of retail unit sizes may be appropriate, depending on site specific circumstances; any units proposed would need to contribute to the vitality and viability of the town centre and ensure that retail function is not compromised. Guidance for the Walnuts Shopping Centre site has been updated to reference to the need to investigate a range of commercial unit sizes. Policy 92 applies to applications involving the loss or reduction of retail space; there is no need to repeat this policy in the SPD.
A significant number of responses stated the need for a stronger emphasis on retail and leisure uses. Some respondents noted the need to retain existing shops while others considered that the Town Centre needs	Change – the Council agrees that continued focus on retail and leisure uses (amongst other commercial uses) is important to ensure the ongoing vitality and viability of the town centre.

Response	How has response been addressed?
<p>better/decent/more variety of shops, in terms of the type of shop, the nature of ownership/operation (e.g. independent, family run) and also shop sizes (e.g. small shops). 'Nuts to the Walnuts' stated that the SPD should make it clear that if the Walnuts Shopping Centre is demolished new retail space should equal or exceed the floor area which has been lost. Another respondent suggested that there is continued need for an indoor shopping centre, whilst another questioned the need for an indoor mall.</p> <p>Some respondents were keen to see small interesting shops rather than large brand names, whilst others were keen to see large retailers encouraged to return. Many respondents were keen to see a mix of small, medium and large unit sizes / retailers, including units with the ability to convert/subdivide (adapt easily to change). One respondent noted that the bigger retailers can support the smaller shops and businesses.</p> <p>Some respondents noted that small local retail as a key part of the 'small Kent town' character of Orpington.</p> <p>Some respondents considered that the town centre did not need any further retail. One supported reducing the retail offer in replacement of leisure facilities. Another states that they are not against reducing the number of retail units and floor space in favour of housing and added that many retail units have storage space which is superfluous to the modern business model. One respondent considers the high street is too long and suggested concentrating retail between Tesco and the Walnuts to free up the northern end for housing.</p>	<p>The importance of commercial development is set out throughout the SPD, including as part of mixed-use development. Some additional references have been added, including to guidance for the Walnuts Shopping Centre site in section 6.</p> <p>Policy 92 applies to applications involving new retail or the loss or reduction of retail space. It is not necessary to repeat this in the SPD.</p> <p>In response to the many suggestions for new retail, planning can only focus on use classes, and can't specify particular operators or types of operators. However, these suggestions have been passed to the Council's economic development department for information.</p>

Response	How has response been addressed?
<p>Many respondents suggested particular named businesses or types of operators that should locate or remain in the Town Centre.</p> <p>Some respondents felt that more variety of uses would improve a perceived issue with vacancy rates.</p> <p>Many respondents identified particular types of retail or leisure use which should be limited, as they considered such uses were unnecessary or that there were too many of said uses currently located in the area.</p> <p>One respondent considered that the Council should get rid of Tesco as it has ruined Orpington and closed lots of shops, whilst another notes that Tesco was huge but benefitted local residents.</p>	<p>No change – the Council notes the suggestions put forward.</p> <p>As noted above, planning can only focus on use classes, and can't specify particular operators or types of operators. However, these suggestions have been passed to the Council's economic development department for information.</p>
<p>Orpington 1st welcomes the new cultural focus of the council and would like to see more support given in the SPD to ensure that the town centre provision reflects the major town centre status of Orpington.</p>	<p>Change – the Council acknowledges the importance of cultural uses and the benefits that they can bring to town centres. The SPD notes the importance of cultural uses, e.g. GN2.</p> <p>Development Plan policy, including the cultural policies set out in the London Plan, would apply to relevant development proposals; it is not necessary to repeat these policies, although a reference to London Plan policy HC2 has been added to section 2 of the SPD.</p>
<p>Some respondents raised the need for a decent market, including a suggestion for a permanent marketplace under a covered plaza.</p> <p>Orpington 1st noted that the current market and event spaces are hidden from view, reducing the benefit of activation to the wider town centre businesses. New developments should improve permeability into the centre and provide additional outdoor spaces for community use.</p>	<p>No change – the Council agrees with the respondents about the benefits of markets. The SPD highlights the importance of the market in section 6. Local Plan policy 100 would apply to relevant development proposals and is referenced in the SPD policy framework section.</p>
<p>Several respondents noted the need for better disabled access to shops.</p>	<p>Change – the Council agrees that inclusive design is an essential consideration for new development. The SPD has a specific inclusive' design principle which seeks the highest standards of inclusive design. GN5 also refers to relevant Development Plan policies that promote inclusive design. The SPD has been amended to include reference to the Urban</p>

Response	How has response been addressed?
	<p>Design Guide SPD, which includes guidance on inclusive design and shopfronts.</p> <p>It is noted that this policy and guidance will only apply to new planning applications. Issues of disabled access to existing shops is a matter for Building Regulations which operates independently of planning; it is not necessary to repeat their requirements in the SPD.</p>
<p>Orpington 1st also support the opportunity to redevelop part of college premises for mixed use. High quality, flexible, and digitally advanced workspace – alongside conference facilities and student accommodation, would all contribute to the town’s enterprise offer.</p>	<p>Change – the Council agree that the college is an important use within the town centre. The SPD notes the importance of retaining the college in the town centre; further reference has been added to clarify that policies 20 and 27 of the Local Plan will apply where development of the college comes forward.</p>
<p>A developer/landowner discouraged LBB from adopting the approach advocated in guidance note 17, i.e. utilising planning conditions to remove the provisions of Use Class E and to remove specific permitted development to protect the vitality and viability of the town centre rights. The respondent requests that this Note is reviewed to allow for flexibility of uses within Class E.</p>	<p>No change - GN17 is considered appropriate. It specifically states that conditions will be used where necessary, rather than in all cases, hence the guidance already has sufficient flexibility.</p>

Table 12: Public realm, permeability and connectivity

Response	How has response been addressed?
<p>Orpington 1st consider that clearly identified and funded management for the sustainability of public realm and public/private spaces is an essential component of good town centre planning. They note that the town requires improved infrastructure to accommodate both indoor and outdoor events; and that spaces should be designed with consideration for their end use, with appropriate services – electricity, water, hard standing, level ground, access, toilets - installed.</p>	<p>Change – the Council agrees that the public realm is an essential component of good town centre planning. The SPD notes the importance of new and improved public realm throughout. A further amendment has been made to include reference to the Urban Design Guide SPD, which includes guidance on public realm.</p>
<p>Some respondents sought improved / additional green spaces connecting the southern end of the town to the Cray Valley. Others stressed the need to improve and link open spaces to residents, specifically improving environmental links, e.g. cycleways, walkways and promoting</p>	<p>No change – the Council acknowledges the importance of green and open spaces and improved connectivity between existing and new spaces. There is broad support for such proposals in the SPD, but requiring them is beyond the remit of the document. The</p>

Response	How has response been addressed?
<p>walking across Orpington with signposting (e.g. distance and time to destination).</p> <p>One respondent welcomed paragraph 4.16 but would like it to go further, suggesting that the development of north-south connections should be part of a larger scheme to enhance the Cray riverway this would extend the route from its current southerly terminus at the museum right through the town to the war memorial along a traffic free route, with ultimate aim of a continuous traffic free walking route from the war memorial via the London loop to the newly opened England coast path at Crayford.</p>	<p>suggestions put forward have been passed to the relevant Council department for information.</p>
<p>A number of public realm issues were identified, with some respondents also suggesting public realm interventions/improvements to tackle these. This included improvements to paving, new street furniture, improved footpaths, new access routes and improved signage and lighting.</p> <p>'Nuts to the Walnuts' consider that the SPD should prioritise accessibility when designing public spaces and considering street layout. It should state that street furniture should not cause difficulty for disabled people navigating the town's pavements, particularly for visually impaired people and wheelchair users. The SPD should also emphasise the necessity of accessible public transport to existing and future attractions and facilities. These points were echoed by several other respondents who noted the need for better design and access for disabled people including wheelchair users.</p>	<p>Change – the Council agrees with respondents about the importance of public realm and notes the suggestions put forward; these have been passed to the relevant Council department for information.</p> <p>The importance of new and improved public realm is evident throughout the SPD. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm. This guidance emphasises the importance of accessibility and legibility.</p>
<p>Several respondents raised concerns about guidance regarding the aim for improved pedestrian permeability across the town centre, including guidance note 12 and figure 4 which some respondents assumed was a proposal to create actual new routes which would involve the demolition of existing homes.</p>	<p>Change – the Council notes the concerns raised. Figure 4 has been updated and further wording has been added to clarify that permeability improvements are indicative, not literal suggestions.</p>
<p>One respondent questioned guidance note 7 and how space 'above ground floor level' can be inclusively accessible. A podium space is likely to be only for the exclusive use of residents/occupiers of that development. Public space needs to be easily accessible, so this basically should be at ground level.</p>	<p>Change – the Council acknowledges concerns about accessibility of space above ground floor level. Such space can be accessible although this would need careful consideration including issues relating to privacy and access. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm and would apply to</p>

Response	How has response been addressed?
	any proposals involving above ground floor level public realm.
<p>Several respondents questioned whether the town centre should be a place to dwell, as set out in the vision.</p> <p>A respondent felt that the town centre was currently easy to navigate but would become problematic with increased density, courtyards, places and squares.</p> <p>Some respondents raised the potential for more disturbance resulting from improved connectivity.</p> <p>A respondent suggested that the SPD talks of placing benches in roads leading to and from the station (e.g. 'places to pause' referenced in paragraph 8.18) but considers this would be totally out of character for existing, quiet residential roads.</p>	<p>Change – the Council recognises the concerns raised regarding potential impacts of additional places to dwell and increased connectivity.</p> <p>The principle of the town centre as a place to dwell is considered appropriate, in terms of ensuring the town centre facilitates a diverse range of uses and activities to attract people and encourage them to spend time there, which could have significant social and economic benefits.</p> <p>Likewise, increased connectivity is considered to be desirable, as it helps users of the town centre navigate and improves access to the area. However, it is acknowledged that any proposals would need to factor in a number of considerations including potential for increased disturbance for residents. The SPD has been amended to include reference to the Urban Design Guide SPD, which includes guidance on public realm and designing out crime.</p>
A local group suggested that the SPD provide guidance for improving rear of High Street properties facing Augustus Lane and Berwick Road service roads.	No change – the Council agrees that these areas have potential for improvement. Appropriate guidance for these areas is already provided in the Western Edge section of the SPD.

Table 13: General comments (including comments relating to the Strategic Environmental Assessment)

Response	How has response been addressed?
There were a number of comments questioning the link between the production of the SPD and a private developer who, at the time of the SPD consultation, was seeking permission for a large mixed-use development proposal on the Walnuts site.	No change – the Council can confirm that the SPD was drafted and funded solely by the Council, with no involvement or funding from third parties.
A significant number of responses were direct objections to the now withdrawn planning application. Many responses criticised the level of engagement with residents by the applicant and the accuracy of the consultation materials that were	No change – the responses to the planning application raised a number of issues that mirrored the issues raised as part of the SPD responses, e.g. opposition to tall buildings. The Council's

Response	How has response been addressed?
<p>provided. A number of respondents, including 'Nuts to the Walnuts', considered that the responses to the planning application should be considered as part of the SPD responses.</p> <p>One respondent noted that the application had no consideration of the Equalities Act, and should not have progressed to an application. The council needs to review and reinforce the planning department as a result.</p>	<p>response to these issues is provided in tables 4 to 12 above.</p> <p>However, the (now withdrawn) planning application is entirely separate to the SPD. Issues such as the application consultation materials and the engagement undertaken by the applicant are not relevant to the SPD.</p> <p>It is not appropriate to consider responses to a planning application as proxy responses to the SPD consultation. The application comments were submitted in response to a specific development proposal, rather than broad planning guidance, and it would not be appropriate (or in some cases possible) to glean an opinion on the SPD from comments on the planning application.</p>
<p>Orpington 1st acknowledge the benefits of being located on the border of Kent (the London-Kent Gateway) but are clear that Orpington is part of Greater London, one of only 32 Major Town Centres in the region, and suggest that the local authority support businesses in promoting the town as being part of London. They would like to see greater clarity and emphasis being put on the town's location to prevent the misconception that Orpington is a small town in Kent. They add that the correct positioning and status of the town should enable officers to take full advantage of the opportunities and funding streams made available from the GLA, which can have a direct and positive impact on business and the community at large.</p>	<p>No change – the Council acknowledges Orpington's status as a major town centre. The SPD (and by extension the Local Plan and London Plan) are clear about this. The guidance in the SPD is aimed at ensuring that future development in the town centre is commensurate with its major town centre status.</p>
<p>Some respondents suggested extending the SPD area and Orpington BID area; suggestions were to extend to the A224 Cray Avenue / Court Road to include the entirety of Priory Gardens, High Street and Carlton Parade (which provides a focal point beyond the village). As the gateway to Orpington Town Centre, the approach from the A224 should be given due consideration in planning guidance.</p>	<p>No change – the Council recognises that these areas provide important functions. However, it is not considered necessary to extend the SPD to cover these areas, as the SPD focus is on the designated town centre and these areas are not within the town centre boundary as defined by the Local Plan. Carlton Parade is a designated neighbourhood centre in its own right.</p> <p>The BID boundary is not a matter for the SPD.</p>
<p>A local group considers that the SPD should help to create a green network connecting green spaces around the edges of the town centre and place the town centre at the heart of a 20-Minute</p>	<p>No change – the SPD includes a number of references to promoting sustainable transport and improving green infrastructure, which links to the principles referred to by the respondent.</p>

Response	How has response been addressed?
<p>Neighbourhood with the aims and objectives of creating a healthier, active, prosperous community. The group cites a number of sources in support of the idea.</p>	
<p>Nuts to the Walnuts' considered that Councillors and Officers should distinguish between positive regeneration plans which would enhance Orpington, and massive overbearing developments, which would not. The SPD should help Councillors and developers to do this by clearly setting out what is acceptable and what is not.</p>	<p>No change – the Council agrees that any development proposed in the town centre needs to enhance the area. The role of the SPD is to provide guidance to assist with the implementation of Local Plan and London Plan policies. It will be a material consideration when determining planning applications in the area. The SPD cannot set out a checklist stating exactly what is and is not acceptable ahead of applications being determined.</p>
<p>Nuts to the Walnuts' requested that the SPD state that Council Officers and Ward Councillors have a duty to liaise formally and regularly with residents regarding medium and large developments in the local area.</p>	<p>No change – the Council agree that community consultation on new developments is important. New developments would be subject to statutory consultation requirements, and applicants are expected to engage extensively with local communities when preparing development proposals.</p>
<p>Some respondents raised concerns about the SPD consultation, including the following:</p> <ul style="list-style-type: none"> • Criticism that the document link did not work. • Criticism about the lack of public engagement sessions either as face-to-face presentations or online. • 'Nuts to the Walnuts' recommended a variety of additional consultation techniques for future consultations by the Council and developers, including documents being made available in a variety of different formats and languages; and having a telephone answering service. • Lack of awareness of the consultation process and the opportunity to comment via Commonplace appears limited in duration especially given the context of the pandemic guidelines. This may have limited the quality and quantity of the feedback. • Need for a proper resident consultation with planning officers regarding what 	<p>No change - the Council considers that the SPD consultation was extensive and satisfied all statutory requirements. It was also consistent with the Council's adopted Statement of Community Involvement (SCI).</p> <p>The SPD was accessible on the website throughout the consultation period.</p> <p>The documents were available to view in hard copy. Regarding availability in other forms, the Council received no such requests. Had such a request been received, the Council could have considered this, in line with the Public Sector Equality Duty. The draft SPD and supporting documents were provided as accessible documents using relevant software, which is consistent with Council standards.</p>

Response	How has response been addressed?
they would like to improve Orpington and not what is being proposed.	
<p>TfL Commercial Development suggested including the redevelopment of Orpington Bus Station as a potential development opportunity, subject to any TfL operational requirements including bus-rail interchange being accommodated as appropriate.</p> <p>TfL state that they would be supportive of the redevelopment of the station car park and the introduction of a CPZ in the town centre and surrounding the station.</p>	<p>No change – the Council notes the suggestions, but consideration of these sites as potential development sites is more appropriate for the forthcoming Local Plan review.</p> <p>The introduction of a CPZ is beyond the remit of the SPD.</p>
The SPD should fully explore the potential of smaller sites away from the town centre with a view to dispersing development across the borough to accommodate families.	No change - the Council notes the suggestion, but this would be a consideration for the new Local Plan, rather than the SPD.
<p>‘Nuts to the Walnuts’ and several other respondents raised concerns about the financial robustness of developers (including a comment about a non-local non-British developer) and highlighted the risk of approved development not being completed and a new leisure centre not being delivered. ‘Nuts to the Walnuts’ consider that the SPD should state that a comprehensive financial risk assessment will be carried out before planning permission is granted to any developer undertaking large scale redevelopment projects in Orpington. Another respondent suggested that any development is phased to ensure that the leisure centre is completed prior to other development.</p>	Change – the Council acknowledges the concerns raised, but such a requirement would not be within the remit of the SPD and is unlikely to be considered material to any future planning permission. Planning can ensure that developments are phased to require certain elements to be delivered in early phases. The SPD has been amended to include additional guidance on the leisure centre, which aims to ensure that any period of closure is kept to a minimum.
One respondent criticised the lack of explanation of the vision for the Bromley Borough from the Local Plan of 2019 or how this has been aligned with in the draft SPD.	No change - the SPD vision clearly flows from the Local Plan vision, and informs the guidance in the SPD.
A developer/landowner with a land interest within the town centre was supportive of the underlying principles that the SPD seeks to deliver for the town centre; but considered that there are a number of Guidance Notes within the document that are unduly	No change - the guidance notes are considered appropriate in terms of the level of detail. The SPD provides guidance to assist with the implementation of the Local Plan; it does not set out new policy.

Response	How has response been addressed?
restrictive in the absence of a full evidence base.	
One respondent suggested that the SPD should seek to retain Lynwood House which is adjacent to Site 12.	No change - the guidance in the Orpington Station & York Rise is considered sufficient to guide any development in this area, particularly paragraph 8.20 which states that new development should seek to compliment local heritage assets.
A local group suggested an amendment to celebrate connections with Eltham, Orpington's nearest Major Town Centre, as Seely and Paget, the architects of the former Orpington Library (adjoining The Priory) had previously created the controversial Art Deco extension to Eltham Palace.	No change – while the suggestion does highlight an interesting historical connection, an amendment to the SPD is considered unnecessary.
A respondent felt infill developments should be avoided and others queried references to “Historic gaps” (in the SPD Vision), ‘so-called’ undeveloped or underdeveloped areas.	No change – the Council acknowledges the concerns raised. Infill development is suitable in principle, but the suitability of specific proposals would depend on site-specific considerations and would be assessed against a range of policy and guidance, including the SPD. Reference to historic gaps does not mean they will be developed; enhancement could include improved connections.
Respondents noted that the SPD has split Orpington into zones, but felt that consideration should be given to the impact of its decisions in one zone, on other zones, and the character areas should be treated as a coherent whole not developed in isolation from each other.	Change – the Council acknowledges the response and notes that this is the intention in terms of how the SPD should operate; the character areas are not self-contained. Reference to this has been added to the SPD for clarity.

Appendices

Appendix 1: summary of Commonplace question responses, by theme

Themes

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

1 General comments

14 responses received in total

What should this guidance include?

General

- Needs a vision of what Orpington can be / look like before any detailed planning guidance
- Guidance must be in line with excellent air quality, a car-free future and to allow safe spacing for the current and future pandemic
- Individual events seem like a flash in the pan rather than a regular, well thought out strategy which complements the town centre.
- more culture, street life, range of shops ,farmers market, active travel,

Specific issues

- inclusive
 - places for youth to hang out
 - low cost to community groups, eg. baby classes, hobby groups to alleviate isolation.
 - Seating in the walnuts esp for those with restricted mobility
- Existing quality buildings should be respected and enhanced - eg GPO.
- concentrate on making the town centre more child friendly
 - indoor soft play centre
 - fountains/play equipment.
- Development
 - Any development is assessed to be carbon-neutral, using green energy and promoting active travel.
 - Stop the dense development of small flats
 - build affordable housing - social housing and / or key worker housing
- encouraging a more mixed use, environmentally friendly space.

- Encourage major stores, independent shops and reduce rents for local shops.
- Opening unused shops for community projects, art studios, galleries and drop in centres for elderly or disabled people
- market to attract a greater number of stalls including local craft stalls
- Update the swimming pool
- More police or security during the evening periods / Priory Gardens
- Transport and Parking
 - restrict High St parking – but avoiding chaos on surrounding roads - parking and buses
 - Incentivise car free visits to the town centre.
 - Measures to alleviate traffic between war memorial and Orpington station, particularly during rush hour/school run periods
 - Parking provision to ensure no shift to Bluewater (free parking)
 - Potential for park & ride?
- Access to the town centre with safe pedestrian and cycle (scooter etc.) access.
 - Safe cycle stands.
 - Wider pavements, especially eastern end,
 - Option for making some of High St buses only
- Improve / refurbish Bowling Alley
- Priory Gardens
 - a cafe & a public toilet
 - improve security

2 The Future of Orpington

34 responses received

What do you think makes a good Town Centre?

- Attractive, safe, diverse, clean, and inspiring.
- Clean, safe, comfortable, easy to walk around, places to meet, green spaces, space for community events, useful/ affordable/ relevant shops, offices, community services.
- Multi trip destination (town centre & local parks/greenspaces)
- Make it 'a destination' with character - retain the village character, trees and plants and pavement cafe culture
- Appealing to all age groups and cultures / everyone living around
- attractive & clean town centre – repair dilapidated units/buildings,
- Safe & friendly to visit to use and socialise. Attractions for all ages not necessarily at the same time of day (bars, restaurants, parks, library). – enhance security after school / evenings
- Prioritise pedestrians / pleasant outdoor seating spaces
- Interest points / activities ... an art trail / regular events
- Good maintenance of infrastructure and good litter collection

Uses

- Variety of uses - accessible for all, promoting environmental sustainability
 - Local produce shops, charity shops, green refill shops, restaurants and cafes, leisure centres, library, cinema support centres, range of shops which reflect local cultural groups, community hub - youth facilities, places of worship and necessary amenities for the elderly

- quality shops (big name stores & independents) restaurants – concern re proliferation of ‘nail bars and less vape shops’
- leisure attractions to appeal to all types of people
 - Young People - Somewhere to meet - safe and out of the weather (currently only MacDonald's.)
 - multi use places for families (play cafes, ceramic cafes etc) and local groups to meet.
- Reduce the empty shops - sensible unit re-use of consistently vacant units - pop up stores
- weekly (Sunday?) market in the High Street, pedestrianising the south section between 11.00 and 15.00. - improve social interaction / sense of community..
- more residential options

Environmental issues, green spaces, transport

- Reduce and eliminate pollution / carbon sources, ref Global warming
- prioritise the pedestrian (safe & welcoming)
 - limit private vehicles to the high street to make it feel more vibrant & safer
 - divert buses through Homefield Rise and Gravel Pit Way (eg to facilitate weekly market)
 - consider complete pedestrianisation
 - space for social distance (2m apart)
- cycle lanes, cycle storage
- more charging points / free or reduced rate parking to encourage the switch to electric cars
- Wide footpaths; wheelchair and buggy friendly.
- Good transport links
- reduce noise,

Public Realm

- Active and vibrant public function at the ground floor level, small architecture (benches, light etc) and green squares (lively public spaces)
- adding more green areas, open natural spaces, trees and seating areas
- Suggested enhancements
 - create a focal point eg. "meet me at the big clock".
 - a bandstand or stage area for local musicians
 - A water feature of some kind, like a spectacular fountain or waterfall wall, to provide focus and contemplation
 - pavement based water fountain for play space
 - Lots of benches and shaded areas for hotter summers

Economic Interventions

- variety of shops should be supported through rates relief and grants
- subsidise space for artists, designers, craft bakers, micro brewers
- fill empty units with community uses etc.

Specific Places

- Walnuts –
 - knock down the and move shops to the high street
 - add some features to the courtyard area
- Priory gardens - Invest to make more family friendly and safer

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

- Vibrant and busy with fewer empty shops & more variety (support start ups)
- Clean, greener, eco friendly, Less pollution and noise from cars and buses and more spaces to sit outside to eat, drink, socialise.
- reputation as being a specialist provider perhaps for hobbies / crafts, or antiques (linking with the historic Priory) – charity shops recast as ‘vintage’
- a good mix of living space, open space, parking, shops, cafes, bars etc
- cinema hotel and good restaurants are still here & more leisure facilities
- a more attractive shopping centre (and entrance)
- easy access to transport, better pedestrian and car free areas
- more al fresco cafe / dining options
- legibility
 - The different parts of the town are linked together
 - a central green space surrounded by places to eat/enjoy a coffee outside,
- Movement / Transport
 - A less congested environment- tailbacks from Tescos and the station often cause traffic queues in the high street with resulting air pollution.
 - Free flowing traffic to encourage footfall and visitors.
 - Pedestrianised High Street - Route the traffic down gravel pit way
 - Lots more space for pedestrians and cyclists
 - walking route which is under-cover
 - a cycle path.
 - Electric buses
- Parking
 - Only genuinely essential (disabled) parking in the High St (with EV infrastructure)
 - good local parking which helps to keep the High Street vehicle-free
- Development / Refurbishment
 - New housing blends in with the surrounding area.
 - refurbish dilapidated flats above High Street shops – for social housing
 - High Street is refreshed, but not too tall, or over-developed
 - more flats so that people can live locally to the centre of Orpington
- Economic suggestions.
 - free loans to charities, colleges, schools, organisations for exhibitions, pop up shops, etc.
 - place for locally run businesses to develop,
 - place which provides support for many groups in the community; youth, elderly, homeless, job seekers
 - shops appealing to the youth - bring the college students into the high street and increase footfall
- Features
 - Priory Gardens
 - A new cafe in the park
 - More events in the e.g. historic re-enactments (jousting?)
 - more equipment & split younger/older children sections.
 - Walnuts
 - more trees/grass, tables, shade
 - ugly leisure centre block to go
 - community use of the paved area outside the back of the Sports Centre eg baby swings, friendship benches and chess tables
 - free activity based outdoor leisure like a cycle path, boating lake etc.

- water refill stations
- water feature or clock or art- work
- permanent public notice board in the library window,
- a regular market on the high street rather than in the Walnuts with arts & crafts, art exhibitions
- New bowling alley

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

- greater range of retail -specifically
 - chains
 - M&S
 - Aldi or Lidl
 - Primark
 - traditional (eg fishmonger, butcher, deli)
 - cycle shop
 - specialist shops
 - Shop selling local products
- greater range of community leisure & culture -specifically
 - up to date public leisure centre
 - Alternative uses for the empty shops such as youth and childcare services, for local kids or community projects
 - Regular specialist markets inc German / Farmers market
 - Art gallery or exhibition space - local history exhibition
 - Escape room (similar to Operation Escape in Bromley)
 - Increased use of library facilities by community groups eg evenings
 - More community toilets
 - Youth
 - Area to be safe and comfortable without being moved o
 - skate park
 - Water fountains to fill up bottles
 - Community hub inc CAB / space for social enterprises.
 - contact point for police
 - Bingo hall,
 - snooker hall,
 - casino
 - Public bins are separated into recyclables
- Late night shopping (Thurs)
- A feature
 - Town clock
 - eg an upside down house (as in Brighton) or similar exhibit
 -
- Pedestrianised high street
 - alfresco dining
 - Cycle lanes and area to safely lock bikes and scooters
- More family friendly focus, Cafe/play area, for parents/child minders
- Greater police presence at night - cars using the high street as a race track
- Green Environment
 - More plants and trees.
 - green area and seating locations along the High Street

- leave verges uncut to increase insect population especially bees.

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

- Bars - Retail is declining however Orpington is becoming a center for bars and restaurants
- some retail could be converted into office or nursery schools, as there is a shortage of both.
- Offer empty spaces to new/upcoming community events and organisations.
- Focus on small businesses, shopping local.
- local smaller shops (especially green focus, such as refill/zero waste)
- nicer places to socialise/spend money.
- spaces for home workers to take a break, if they have no private open space.
- Shared spaces/ hot-desking for hire for those not commuting, with office facilities
- Full pedestrianisation of the High Street will provide for generous social distancing.
- Lower rents to help struggling businesses - be flexible on Change of uses
- Green space
 - all local green spaces should be invested in to improve attractiveness & safety - Priory gardens should be a big focus
 - Protect existing parks and green spaces and expand their number and size
 - encourage strong links in new developments to local green spaces (for mental and physical wellbeing, for cleaner air and carbon capture, for nature and wildlife).
 - Increase areas managed for biodiversity and allow some areas to develop naturally.
 - Replacement trees with equal canopy size.
 - Safe active travel needs to be first and foremost

3 Housing

15 responses in total

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

Locations

- Convert empty shops / space above shops
- use empty commercial space
- near the station (attractive to commuters)
- shortening the high street
- brownfield land

Requirements

- High quality, well-maintained & secure housing.
- requirement for additional schools, childcare, doctors, public transport pedestrian and cycling-friendly paths, roads, parking etc to accompany additional housing.
- need for outdoor space to accompany residential development.
- build sustainability and low environmental impact as standard, and with an eye to future climate adaptation (monitor water availability)
- low rise and plenty of green space
- family housing needs space

What type of housing should be the priority?

15 responders in total – many have ticked more than one type of housing as a priority in their response;

- Affordable home to rent - 9 responses
- Affordable housing to buy – 11 responses
- General market housing to rent – 3 responses
- General market housing to buy – 5 responses
- Houses of Multiple Occupation (HMOs) – no responses
- Student accommodation – no responses
- Supported housing for vulnerable people – 6 responses
- Other – 2 responses suggest Key worker, one suggests flats priced for first time buyers.

Is there a particular housing size that should be prioritised? (as above 15 replies, have ticked more than one size unit as a priority).

- One-bed homes – 3 responses
- Two bed homes – 11 responses
- Three bed homes – 5 responses
- Four + bed homes – 0 responses

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

- Need for high quality affordable housing for young people as well as key workers and their families
- Ensure the necessary associated infrastructure is also provided including public amenity and green spaces (including roof gardens)
- Homes within walking distance / good public transport / cycling options will help avoid an increase in car use in Orpington
- Development should not limit retail (building on delivery space / car parks)

Design

- be good quality to be fit for the long term
- Tall buildings need to blend in with their surroundings, not block light and feel oppressive and over-developed (examples of increased height in redevelopment -Tesco, Orchard Grove, police station redevelopment)
- incorporate communal work from home - eg atrium space
- Energy efficiency / environmental impact
 - retrofit existing dwellings / PV panels
 - new buildings should meet higher standards of energy efficiency and shared ground source heating should be used.
 - resist energy inefficient building.
 - Non-permeable materials used on driveways
- Insulation, ventilation, refuse issues addressed (overheating, soundproofing)
- Restriction on buy-to-let to build community
- Using brown sites for housing is better than chipping away at Green Belt.

4 Transport and Infrastructure

20 responses in total

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

17 responses all very supportive

- Important, Massively, extremely very, paramount, increasingly, vital
- walking is most important, then cycling.

- often the only transport options of the young.

Air quality & Town Centre experience

- reduced motorised traffic
- improves air quality
- makes visiting the town centre a more pleasurable experience.
- vital for the footfall for local businesses and facilities
 - tap into active travel potential of local catchment
 - attractive, more pleasurable / leisure experience, healthy, sustainable and vibrant town centre
- Accessible / fuss free
- motorized traffic makes the High Street noisy and polluted & doesn't encourage families with young children to feel relaxed and safe.

Walking

- Wide pavements
- Pedestrianisation
 - would encourage people to stay longer and browse more.
 - traffic can be diverted - & is when there are events each year, attracting hundreds of people.
 - It would be great to be able to sit outside at the restaurants and cafes in a safe, clean and quiet space.

Cycle

- More cycle infrastructure
 - safe cycle routes esp for young people
 - Secure cycle parking

Bus travel

- Need good bus access
- Greener bus travel

What opportunities are there for new or enhanced walking and cycling routes in the town centre?

Cycling

- safe cycling routes / segregated cycle lanes (9 supportive responses)
 - through the high street.
 - wide enough for children to use safely.
- Cycle infrastructure
 - Bike racks

Car traffic

- sections of the high street car free or one-way only for cars.
- close off the traffic / Pedestrianise the town centre x6
- busses kept to drop offs at either end (plus middle, accessed from behind the Walnuts)
- diversion routes which are used during events which should become permanent

Parking

- remove on street car parking on the high street
- Sainsbury's multi storey car park is half full

Public Realm

- Orpington is becoming a hub for cafes and restaurants - people love sitting outside these facilities...but it could be so much more popular with removal of the traffic from High Street. (eg New Road in Brighton!)
- Better connection from station to high street.
- Healthy Streets guidelines – prioritise for health & wellbeing of people of all ages and mobilities <https://healthystreets.com/>
- create/improve active travel routes to/from and within the Town Centre to embrace the Prime Minister's Gear Change vision - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf
- enhancing and improving existing routes along paths and streets so they are safe and attractive for 8 to 80 year olds

Buses

- Must be frequent and affordable.

Road / Highway

- The roundabout by Lloyds is not safe and does not prioritise pedestrians.
- raised areas of road should be made into legitimate crossings (cause confusion as pedestrians believe them to be crossing areas)
- Cycle dangers
 - Carlton Parade, approaching from Sidcup, turning into Orpington High Street is dangerous and intimidating. There should be a shared cycle/foot path all the way from Nugent Retail Park to the High Street instead of the cycle lane transferring to the road halfway there.
 - drivers dangerously overtaking cyclists ON THE ROUNDABOUT. To solve this, a dutch style roundabout (one is already in place in Cambridge) would immediately solve this issue and severely reduce the risk of an accident
 - Tackling severance at both ends of the high street is key to making the town centre an attractive destination to cycle to.
 - War Memorial roundabout is hostile to vulnerable road users,
 - one way system near Priory Gardens is designed for traffic flow rather than active travel."

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

- 5 responses wanted car free dev or car free High Street
- 8 sought much reduced numbers of cars but acknowledged some needs (mobility / delivery etc) and a number highlighted EVC where parking provided
- Several noted the existing provision in 2 multi stories & how they could be accessed One noting need to compete with Nugent
- One felt there would be continued demand

Parking

Restrict Car Parking

- responsibility to the environment and to our children.
- Would ease bus movement
- Supported by more frequent / reliable buses.
- Reduces congestion & makes Town Centre more appealing

Allow Car parking

- needed for people
 - with mobility /health issues / elderly;
 - parents with small children;
 - people with heavy shopping.
- will be in demand for years to come
- only in existing car parks not on the High St
- existing car parks needed (access to Walnuts via Gravel Pit Way) to prevent drain to Nugent

EV Charging

- If parking has to be provided, should have EV charging facilities.
- More charging points should be installed for electric cars.
 - in car parks and on Lych Gate Rd

Ped / part ped High St x8 responses

- previous attempt at Pedestrianisation unsuccessful - the reasons for this should be re-visited.
- difficult to cross the street with children because of all the terrible driving
- parking only in walnuts & Tesco
- other routes around it including to the two multi storey (Walnuts and Tesco's) car parks and the disabled parking area
- get rid of through traffic.
- Pedestrianize between the Walnuts roundabout and War Memorial roundabout
 - Buses and Bikes and ESSENTIAL deliveries only - other traffic travelling via Gravel Pit Way
 - Buses vis Gravel Pit way too
- Active travel, Bicycle paths / secure cycle parking and pavements should take priority.
 - safe cycle lanes continuing along Sevenoaks Road to Green Street Green High Street

Car Free Development (future)

- Two specific refs - both yes

Are there any improvements to public transport that you would like to see? How can access to Orpington Station from the High Street be enhanced?

High St

- reducing traffic on the high street, perhaps by making all / part car free
- buses make slow progress through the high street
- Divert buses off High St / Bus hubs at periphery of high street, x2
- Electric buses only in High St
- Widen pavements

Route to Station A232 (TfL)

- walking route between the station and Tesco is poor / clogged
 - raised tables / crossings on side roads along A232
 - widen pavements
- better wayfinding and lighting via the back of the station to town centre including via Knoll Rise
- buses only on Station Rd cars only on Tower road (too narrow for buses)
- more greenery

- air quality monitor
- optimisations to the traffic lights to improve the flow up towards the station ?
- cycle and scooter lane (with storage).
 - Electric scooter hire (if legal)

Buses

- buses make slow progress up to the station.
- dedicated shuttle bus -
 - station to war memorial
 - Orp Station - SMC station– (via High St - Carlton Parade, Cray Avenue / Nugent)
 - Orpington station to Biggin Hill, (via airport, & planned hotel and College).
- More frequent buses from outlying suburbs/villages – including new dev at Fort Halsted
- an X51 service (51 overcrowded in the peaks)

Train routes

- direct services to London from Chelsfield station - recent alterations mean changes at Orpington - draws commuters to drive to Orp Stn at Orpington

What do you think are the priority infrastructure requirements for Orpington Town Centre?

- Prioritising cycling and walking then public transport
- Create cycle / pedestrian network spine (cycle routes / safer pedestrian crossings) and Mayfield Avenue / Knoll Rise towards High Street and Priory Gardens
- Progress Orpington to Green Street Green Walking and Cycling Route improvements 2017 - <https://cde.bromley.gov.uk/documents/s50051764/Proposals%20for%20improvements%20to%20the%20Orpington%20cycling%20and%20walking%20network.pdf>
- Complete shared walking/cycling route from Crittalls Corner to Orpington Town Centre - currently stops short of Carlton Parade
- cycle routes & infrastructure (racks) x7
 - High Street
 - along Sevenoaks Road to Green Street Green High Street.
 - into local neighbourhoods
- municipal bike scheme

Walking

- improve/upgrade existing walking routes and footpaths
- better signage for healthy routes in/around Town Centre
- pedestrianisation

Station

- easy linkage to high street without creating more traffic on that stretch of road.
- National Rail / Southeastern improvements to platform underpass and links to emerging Crofton Road upgrade (to).

Drainage

- Valley location – inc risk of flooding as weather changes / global warming
- Good time to address during major redevelopment / changes

Do you have any other comments in relation to transport and infrastructure in Orpington Town Centre?

- Full / partial / occasional pedestrianisation
- Encourage walking and cycling (cycle lanes on the residential streets, along with pedestrian crossings, traffic calming, for a more healthy population).
- Act (eg cycle lanes) not just talk in platitudes about intentions regarding these features.
- Electric buses
- There needs to be more done in terms of traffic calming and enforcement
- Liaise with local people , residents associations and relevant organisations / stakeholders, e.g. Bromley Cyclists, Bromley Living Streets, Bromley Ramblers, EnBro.
- Concern about Rat Running (The Greenway – north of Orpington)

5 Offices

5 responses in total.

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

- Local jobs website regularly updated
- Offer flexible workspace
 - incl. cafes that allow workspace
 - meeting venues
 - co-working space,
 - ideally low-cost to support start ups and small businesses.
- target
 - the digital sector
 - young professionals
- showcase Orpington based businesses,

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

- FLEXIBLE workspace -a key comment.
- Rentable, flexible, co-working, low cost, hot desking,
- Good quality to attract young professionals and different sized businesses.

Do you have any other comments in relation to offices in Orpington Town Centre?

- Attract businesses and workers to the town centre (but don't waste money)
- convert empty unviable office to housing.

6 Retail leisure and Culture

13 responses in total

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

Retail

- Too many food establishments inc restaurants, takeaways, cafes,
- Too many charity shops and empty units
- Reduce rental / find tenants
 - more independent retailers

- shops that embrace the growing community feel as a refill shop for dried food, cleaning and toiletry liquids, as well as a repair shop/cafe and a lending library (for DIY tools, electricals, partywear and garden tools).
- accessible, 'trendy' and child friendly restaurants/bars/cafes
- Pop up markets / indoor market in larger vacant unit
- focus on personal services that are best served locally, so leisure, restaurants, bars, dentists and hairdressers

Leisure & Culture

- Walnuts Sports and Leisure Centre - retain and update (note - phase as no other local swimming pool)
 - Gathering / sitting area to encourage street life eg musicians
 - Ice skating rink/roller skating rink
 - Skateboard area,
 - The High Street
 - pedestrians only with relevant affordable parking locally
 - consolidate the shops in a smaller area (one end of the High Street) and release the space to other uses such as housing, recreation.
 - is too narrow for public transport to use it safely.
 - Crossings should be linked so that traffic flows freely.
 - pavements re-laid to reduce puddles
- more homes and offices in the town centre

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

Attractors

- its nearby ! less inclined to go to London
- Walnuts Sports and Leisure Centre,
- Restaurants
 - choices limited but recent restaurant openings (GPO, Pato Lounge and The Orpington) have attracted some back
 - a 'walk to' dinner destination
 - not too different to the offer at Locks Bottom and Petts Wood.
 - Suggest more outdoor seating for restaurants and bars
- Cinema

Detractors

- Concern about safety
- Traffic noise & air pollution
- crowded pavements / pinchpoints

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

- Large art / events space - Walnuts shopping precinct inadequate - split into two relatively small areas which can become overcrowded
- Use inner square for community events,
- pop ups, better quality market stalls
- Supported spaces for social enterprises / community events/learning - with long term sustainable funding.
- a 'little theatre' used culturally throughout the day with evening shows,

- Car free areas so restaurants can spill out
- More open space

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

- Retain & enhance the Walnuts (with provision throughout refurb)
- More activities and places for children, families and young people.
e.g. Places to play and learn music, art, dance, drama, roller skating rink, winter ice skating rink, gymnastics, mini golf, social darts, ping pong, skate boarding, swings, exercise circuits, benches, café, soft play, no alcohol 'games den'
- Improve the existing bowling
- Integrate existing facilities (cinema & bowling) better with the town centre.
- Theatre, art spaces, community spaces, all with long term sustainable funding.

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

- Should be more people focussed rather than commercial and car focussed
- Events
 - eg the big screen (previously outside the old police station), Lighting Up Festival, Orpington Rocks Festival
 - locations - use the High Street more, War Memorial
- More diversity of business

7 Public Realm, Connectivity & Permeability

8 responses received in total

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

Good Public Realm

- flowers / Flower towers
- in front of the cinema, with extra outside seating
- Green walls in front of empty shops
- Speed tables (pavement to road)
- paving
- the cinema and the buildings nearby
- bike racks encouraging cyclists (although under utilised at present)
- Good / Improved general
 - Cinema
 - Independent restaurants
 - supermarkets, banks and opticians
 - Village Halls

Bad Public Realm

- pavements are crowded and cars dominate the town centre – can feel noisy & polluted
- too much heavy traffic (inc buses) on the high street (dangerous place with small children)
- limited opportunity to widen pavements or include cycle provision.
- Entrance to the Walnuts between the leisure centre and the college, including the bridge, are dated and unwelcoming not very inviting

- Too much concrete on some buildings
- Some buildings look tired and uncared for
- The market is generally poor
- Bad general
 - Too many empty shops
 - No big retailer
 - Nugent offers better shopping
 - Weekend crowd are off-putting

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

Transport & Highways

- Pedestrianise / less traffic on the high street,
- Provision of storage/parking for bikes, e-scooters, motor-bikes & other vehicles

Visitor experience

- Unique character that sets in apart from other town centres “celebration of local achievements: Dina Asher-Smith (athlete) , Reggie Perrin (character created by David Nobbs); the 1920’s Orpington car; the Romans etc. etc.
- more interesting shops, i.e.
 - a bookshop, fashion, eco-shops
 - fewer or rebadged charity shops as ‘vintage shop’
 - local community hub for info / lost property /police contact point
- Fill vacant units - retail or leisure activities
- Enhanced greening / more planters
- Safe, clean, well-lit spaces and benches to rest.
- Light & airy so you can see the sky
- Well maintained commercial and residential buildings.
- Refresh / enhance leisure centre offer
- shared spaces for people to get a break from working at home.
- Enhance public realm in front of the Walnuts leisure centre e.g. planting; or maze or hopscotch painted on the ground for children

Homes

- Well-proportioned, energy- efficient housing, with good insulation, ventilation, and access to green space
- Homes that are not generic square blocks
- Play area for children close to new flats

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

Active travel

- The town centre is easily navigated on foot once you are in the High Street. However
 - Side streets that junction on to high street can be difficult to cross
 - Leisure centre entrance should be better integrated with the town centre
- Requiring improvement (eg maintenance & lighting) and / or signposting
 - access the leisure centre from the high street (steps not obvious)
 - River Cray path (north from Priory Gardens to the Nugent)
 - Path between the Walnuts and Priory Gardens.
 - The footpath over the bridge

- Walking and cycling route from Orpington Station (to Hillview Road and from Elm Grove to Knoll Rise).
- street furniture (bus stops, bins, signs, seats, etc) can create pinch points (around McDonalds, outside the old Post Office/Boots and by Edinburgh Woollen Mills)

Cars

- should not to navigate through the town centre, as there are alternate routes available.
- Pedestrianize with clear cycle lanes and room for invalid vehicles.

8 Historic Environment

10 responses received in total

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

- Very - a critical part of its unique local cultural identity & character, distinguishing Orpington from other places incorporating
 - Roman settlement
 - the Priory,
 - Railway generated development like the Knoll area

Benefits

- Prosperity - High Streets with unique features prosper - many high streets / shopping centres have been sanitised and look the same – *'the Walnuts is a just a walk through to get out of the rain'*.
- shared interest for residents, and can bring generations together.

Enhancement

- local history should be better identified and enhanced
- highlight unnoticed historic characteristics - facades above High Street.shops

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

- Priory and Priory Gardens Conservation Area - but concern about the Priory
 - hidden / obscured
 - contents of the former museum
 - lack of public use
- Roman remains
- Early mock Tudor buildings
- Heritage buildings related to past commerce & industries
- Gabled shops along the linear High Street (new buildings should be required to blend in.)
- Natural environment – historic trees and green spaces

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

New buildings to locate on 'brown' land, seek comment and confirmation from the community, and should be

- in context and in keeping with the existing development - sympathetic aesthetic to the existing buildings – don't juxtapose modern with historical
- similar height, - slightly higher if replacing blocks in the Walnuts but not directly adjacent to existing residential properties or towering on their skyline.

- similar materials - flint walls would mirror the Priory walls

Potential to preserve & enhance the historic environment

- showcasing history eg the new Orpington GPO, - template for future developments
- preserve facades and imitating existing facades
- no new development to obscure historic buildings

New development to enhance & celebrate the historic environment

- footpath link between the Priory & Priory Gardens, and the Walnuts / High Street (Dryden Way/ Lychgate Road to Bark Hart Road). – suggested like improvements to the Nugent Centre path through trees and past the stream, with a water feature.
- Reflect how historic towns like Canterbury, Richmond and even parts of London like Chancery Lane and St Paul's blend the ancient and modern in aesthetically pleasing ways.
- Involve experts in historic preservation and sustainability. "
- Careful selection of developers (for Council schemes)

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

Enhance / develop local displays (currently at the Bromley town centre library), Crofton Roman Villa, the Priory buildings, Biggin Hill, connections with David Bowie as well as nearby National Trust, English Heritage and other historic sites.

Public Realm enhancements

- Improve heritage related signage
- local history walking trail with links to websites
- use or reflect former museum artworks in the new public realm – seek sponsorship e.g. the 18th century fire engine (not as big as it sounds) could be sponsored by an alarm company?

Priory building should be

- occupied by artists- new commercial activity could be linked to V22's planned artists occupation
- open to the public (at least occasionally), and school visits should be resumed

Art / Crafts area (note increased hobby activity during covid)

- retail area/ inside market space for arts crafts & hobbies - with retail & gallery space
- baking & cooking/ Painting / Drawing / Pottery / Ceramics / Crafts / Cameras & photography / Sewing / knitting / Crochet / haberdashery / musical instruments "
- community sharing of oral histories, photos and artistic representations of Orpington through the ages as well as a vision for the future.

9 Green Infrastructure

19 responses in total

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

Only advantages –

- Contribute to sustainability, biodiversity
 - Enhance wildlife / offset biodiversity loss
 - pollinator corridors,

- improved water management/drainage
- mitigate climate change
- improving air quality through pollution /CO2 reduction
- connects people with nature in urban settings.
 - Esp those without gardens
- aid economic recovery by increasing footfall
 - people attracted to a more environmentally friendly town centre environment, character / friendly & inviting
- contribute to health / mental and wellbeing
 - Savings to the NHS with a healthier population
 - Encourages exercise
- Community / place quality
 - sense of community, meeting opportunity (inc young people), seating, belonging,
 - events potential
 - respite from workplaces
 - responsibility to take care of the area that you live in,
 - teaches children the advantages and normalises sustainable living
- Combine Green Infrastructure with
 - cycle routes and safe bike storage to encourage people to leave their car at home
 - safe crossings and more solar powered lights for pedestrians to feel more comfortable walking

What type of green infrastructure do you think is most suitable for Orpington Town Centre?

Value of Green Infrastructure

Existing

- promoting the green spaces which already exist,
- existing mature trees on the High Street and around the war memorial – a delight

New

- network of green spaces, connected by urban hedgerows, flowerbeds,
- Parklets,
- planters, (including hanging baskets) / supported by shops - Orpington in bloom competition etc..
- trees,
- green walls, -visually appealing, whilst reducing air pollution and increasing biodiversity – on all new dev (eg Walnuts)
- green roofs – also ‘growing space’
- wildlife areas / meadow corridors - to encourage insects and birds
- borders, - shrubs & bedding / along cycle routes and pedestrian paths
- water spaces new and existing better maintained
- Sustainable Urban Drainage Systems (SUDS)

Also

- Semi-permanent planting / perennials and bushes – removing annuals (esp when flowering) is wasteful – instead reflect French roundabouts
- Native plants
- Would support al fresco dining spaces / pedestrianisation

- Information on the environmental and health benefits of each element of Green Infrastructure - may inspire others to recreate smaller versions outside their homes as well as increase the respect and appreciation for our town centre
- Ongoing maintenance of green infrastructure
- Solar panels

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

Various locations

- Replace parking with parklets
- Green roofs eg Singapore's on high rises and nature ways
- bus stops - where children queue on polluted roads – planting / Bee-friendly (eg Netherlands)
- Verges - Stop mowing (and spraying) and let wildflowers thrive
- roofs on the high street planting / solar panels
- Town center, rain gardens and green roofs
- Pavements
- Empty units

Specific locations

- Along the High St – green corridor / pedestrianise & dig planting spaces
- Priory gardens - wildlife garden/space with a beehive and educational information
- Tesco is crying out for a green wall.
- Tesco roof converted into a growing space for fruit and vegetables
- The north end of the High Street would benefit from more greenery.
- Library / cinema - space outside - more planting and some kind of water feature.
- Walnuts square & link to High St, more planting, trees (noted area 'ripped up' for cinema)
- The Walnuts leisure centre - green walls
- War memorial – more attention
- Orpington station - trees and green walls
- Sevenoaks Road / Crofton Road / Charterhouse Road - Wildflower meadow verges
- car parks - parts which are under used could be planted as wild flower gardens

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

Priory gardens

- it's calming and makes me feel closer to nature despite the urban setting.
- beautiful and inspiring
- not very accessible from High st
- easy to access from R3 bus - stops outside
- children's play park is well equipped - in need of some TLC,
- duck pond is fun
- to walk dog
- Could do more wilding & native species / less formal planting to encourage insects and birds etc
- better use could be made of the wide open space - more events
- more buggy/scooter friendly paths required.
- Used More when the library was there

Public Realm Open Spaces

- when there are market stalls
- recent art works done by local children – more of this please
- high street for shopping and eating out
- Roads to and from Green st Green to Orpington. Charterhouse Road, Sevenoaks Road, Court Road.

Goddington Park - for leisure, relaxation and exercise.

Poverest/Covert Wood. -Wood is good to escape heat and see some wildlife

Jubilee Park,

High Elms

None

- I spend as little time as possible in the town centre.
- Motorised traffic has priority and pedestrians are second class citizens.
- current arrangements don't really encourage you to want to linger
- the high street is too noisy and dirty with the traffic. I used to spend more time at the priory gardens when the library was there. It was a lovely place to spend some time. I probably only spend time in the open spaces now. They were a great idea - more of that sort of thing please.

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

- Market Square (between the Library , Sainsburys and Orpington College)
 - more green
 - incorporate water in some way.
- walnuts entrance
 - planters
 - area of wild flower
 - natural play area for young children?
- Priory gardens
 - improve access from High St
 - 'sort out' the geese – small child petrified / goose poop
 - lake water quality - full of rubbish and smelling of wee
 - hang out for street drinkers and weed smokers
 - priory building
 - revert to community amenity - was ideal for families to make a day of visiting the library / museum and provided public toilets
 - falling into ruin?
- cycle lane 'corridor' to link up green spaces
- bridge and foot path from Walnuts - not pram or wheelchair friendly - a mess and doesn't feel very safe.
- Southern end of high st foot paths
 - Improve – they are narrow and polluted

Do you have any other comments in relation to green infrastructure in Orpington Town Centre?

LBB should 'walk the walk'

- Opportunity for change
 - embrace this seriously, not just pay lip service to it.
 - Involve local school children
 - set up local community groups run by volunteers to save money who will take care of the green spaces.
 - Add a cafe at priory gardens - even if it's a pop up.
- Trees
 - established trees being lost
 - Saplings planted but with poor success rates.
 - Enlist public in tree planting / health monitoring

10 Environment and Air Quality

23 responses in total

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

Raise ambition - Bromley target of zero net Scope 1 emissions (i.e. the Council's own emissions) by 2029 admirable but represents only 1% of the Borough's total emissions. Bromley should, like other Boroughs, reset its target to include 100% of the Borough's carbon emissions.

Increasing Active Travel (Cycling & Walking)

- Improve facilities for people to walk, cycle
- more cycling routes to improve safety,
- more secure cycle storage next to shops, leisure centre and station;
- Hire bikes at the Station and in the High Street
- Need a bike shop
- more pedestrianised areas, safer crossings and wider pavements
- more outdoor public seating for people to rest

Cars & Buses

- Pedestrianisation of Orpington High Street except for disabled and elderly drop off and parking
- Remove on-street parking and prioritise bus-only access. (Car parks accessible from Gravel Pit Way)
- Better / free public transport
- address the phasing out of fossil fuel transport
 - Provide more EV charging points (including in all car parks)
 - Support electric car hire firm to establish off the High Street (eg Gravel Pit Way)
 - Electric buses
- Encourage car clubs (zip car) to area.
- Restrict delivery times for shops
- 20mph zone around town centre
- Enforce engine idling pavement parking & speeding laws (note Carlton Parade concerns)

Public Realm & facilities

- Plant more native trees, hedges and green walls for carbon capture and air quality (note - grass is less useful than planting / trees) as well as for mental wellbeing, natural shade & attractiveness

- Water bottle re-fill points
- more recycling bins and encouragement of streaming waste into the correct bins
- information
 - Measure particulates as well as CO2 and NOX.
 - good information about emissions & recycling
- independent shops
 - refill shops for dried food, home cleaning products & laundry liquids
 - repair shop/cafe
- lending library of things (for DIY & garden tools, partywear, electricals, musical instruments, kitchen gadgets).

New developments (inc Walnuts)

- to be carbon neutral
- Improve energy efficiency, renewable energy / sustainable heating methods (eg heat pumps / solar panels), green energy tariffs
- Generate energy for local business to buy

Retrofit Existing Development

- LBB should set up a pilot scheme to retrofit a housing development with improved energy efficiency measures, to roll out similar projects across the whole authority housing stock
 - to keep warm/cool, reduce energy use and carbon emissions (LBB to fund)
 - to allow Britain to meet the legal requirement of zero net carbon emissions by 2050.
- LBB to fund or secure grant funding

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

Increasing Active Travel (Cycling & Walking)

- Improve facilities for people to walk, cycle
- more cycling routes to improve safety,
- more secure cycle storage next to shops, leisure centre and station;
- Hire bikes at the Station and in the High Street
- Need a bike shop
- more pedestrianised areas, safer crossings and wider pavements
- more outdoor public seating for people to rest

Cars & Buses

- Pedestrianisation of Orpington High Street except for disabled and elderly drop off and parking
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 - Electric buses
- Encourage car clubs (zip car) to area.
- Restrict delivery times for shops
- 20mph zone around town centre
- Enforce engine idling pavement parking & speeding laws

Public Realm & facilities

- Plant more native trees, hedges and green walls for carbon capture and air quality (note - grass is less useful than planting / trees) as well as for mental wellbeing, natural shade & attractiveness

Reduce particulates

- Extend the London ULEZ
- More car free areas in Bromley, Safe Streets initiatives (esp around schools)
- car free days in town centre - maybe one day a week and on special occasions
- Reduce speed limits to lower emissions.
- Ban diesel cars
- Limited permit access during set hours for fossil fuel vehicles to school roads / high streets during set times (school drop-off / pick-up, rush hour,..).
- Higher parking fees for fossil fuel vehicles (or reduced fees for electric vehicles)
- Dedicating more parking places to electric vehicles, adding charging points. Making parking free while charging.
- Actively respond to live peaks in air pollution (restricting access of older vehicles / diesel vehicles & making public transport free in the Borough for that day...). – requires real-time air pollution monitors (see below)
- Ban / enforce ban re wood burning stoves and bonfires

Design

- Roof gardens on new housing developments
- Green walls on Tesco, the leisure centre (entrance & side facing the Walnuts), JTL, other concrete buildings
- More tree preservation orders & compensate loss of trees

Education and Information

- installation of a network, including Orpington High Street, of real-time, on-line accessible air quality monitors (including PM2.5)
- Education campaign re walking and cycling for personal health and carbon footprint;
- provide cycle training & fixing courses;
- Raise public awareness re harm wood burning stoves and bonfires to local lungs (esp during the pandemic).

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

Transport & Highways

- Be brave and face up to the car lobby which is killing Orpington residents.
- active travel infrastructure, especially cycle lanes, joined up across the Borough as part of a network
- Discourage through traffic.
- Congestion between the Tesco entrance and the war memorial needs to be addressed.
- bring in speed control on all Orpington roads.

Air quality reporting

- Report compliance with WHO air quality guidelines to ensure a thriving future - attractive to potential residents

Planning

- Attach significant / great weight to projects which eliminate air pollution and carbon emissions.
- Approve only low and zero emissions replacement buildings

Public Realm

- shops and businesses encouraged to participate in planting and greening of premises
- landscape planting for pollinators, wildlife corners - e.g. rewilding some grass verges
- New developments on should be encouraged to plant trees along the boundary with the narrow pavement. Station Road
- Court Road and High Street - Emission absorbing trees or technology.
- measures to discourage the chewing gum on pavements

11 Development Opportunities

5 responses in total

What is special/unique about Orpington Town Centre?

Good public transport links & local catchment (within walking distance of many homes) and pedestrian friendly environments

High Street

- The War Memorial at one end, The Priory, and the Priory gardens at the other end
- mix of cafes, restaurants, entertainment, leisure and retail. older shop facades are original and could be restored more to character.
- Uniform height
- Period and mock Tudor buildings

The Walnuts

- not very inviting despite past refurb
- potential for vibrant al fresco space attractive to the college students and to families

Environment

- The Priory, and the Priory gardens – ‘lovely and special’
- The River Cray - underutilised as a feature

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

- The Priory and the Priory gardens
- Leisure centre with swimming etc, library and other community spaces.
- Period buildings.
- Flowers in the High Street

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

- The uniformity of height of buildings in the High Street should be preserved.

Further guidance on

- Broomhill Road environs,
- The Priory and area around the Parish Church.

Do you have any other comments in relation to development opportunities in Orpington Town Centre?

- Mixed-use developments could address vacancy as High Street is impacted online shopping and working from home.
- Reduce traffic, increase pedestrian areas / improve safety of cyclists and pedestrians,
- Additional trees and green spaces to enhance attractiveness and air quality
- Residential development to be affordable/ social / key worker, not expensive commuter flats
- Retain community facilities (concern at loss of police facilities)
- Restoration rather than replacement of older properties

Appendix 2: summary of written responses, by theme

Themes

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

1 General comments

- SPD should
 - provide guidance for future developments for flexible and adaptable spaces that are resilient to changing circumstances.
 - respond to and support change from predominantly retail to residential and cultural (including larger scale developments)
 - masterplan to reduce carbon emissions with significant sustainable infrastructure & sustainable buildings
 - be based on a clear vision to ensure a prosperous and thriving future for our town centres.
 - step change in the nature of people movement infrastructure (re pandemic and climate change)
 - Promote active travel - move to walking and cycling including
 - repurposing of civic and highway spaces
 - & additional pedestrian routes to reduce traffic
 - Recognise the local spend / benefit to town centre of
 - increased residents
 - walkers / cyclists
 - involve sensible and practical use of brownfield sites.
 - give clarity over the scale and nature of redevelopment
 - have understanding of deliverability and viability considerations
 - Be an opportunity to enhance the character and local distinctiveness;
 - Involve landscape characterisation and townscape assessments.
 - Protect natural resources, including air quality, ground and surface water and soils and use natural resources more sustainably;
- Take note of
 - the London Plan,
 - the Local Plan
 - the Local Implementation Plan for transport (LIP3)
 - the AQAP
 - Carbon Management Strategy,
 - Habitats Regulations

- recent DFT Guidance of May 9th 2020, manifesto 'Gear Change';
- maintain consultation as SPD develops
- Concern that proposed changes to planning amount to a "developer's charter"

2 The future of Orpington Town Centre

- Flexibility
 - more mixed-use retail, cultural and leisure areas to be the core function of town centres to ensure that they can adapt and thrive
 - Likely shift to internet shopping at expense of town centres
 - key to creating functional and enjoyable civic spaces
 - potential desire for shared work space - benefits of both wfh and serviced offices without the London commute
- variety / vibrancy
 - a range of commercial uses at typically, but not limited to, ground floor with residential accommodation above and including new community uses and public realm improvements
 - residential development - vibrancy (day and night) & footfall.
- Placemaking
 - 20 minute neighbourhood model for places - broad mixture of land uses for existing catchment
 - Prioritise community spaces and activities (inc in empty units)
 - importance of outdoor settings – for health & socialising
 - public realm enhancements - green infrastructure, key to town's reputation - outdoor dining, market stalls
 - green infrastructure – protect, increase, enhance access for multiple benefits
 - equality, accessibility, safety for all (ref elderly and disabled) to buildings, parks, public realm
 - high-quality living - quality buildings and public spaces
 - renewal of other parts (not walnuts) of the town centre develop quarters or zones visually along the high street- with diversity of retail, commercial and community spaces.
 - Identify for Tall buildings round Market Square.
 - higher density of development,
 - low rise and of human scale - avoid high rise wind tunnels without character
- Movement
 - enhance and increase pedestrianisation (full High St)
 - Safe walking / Cycling - increase opportunities.
 - improvements made to public transport.
 - Better permeability / quality access points for active travellers across major highway barriers

3 Housing

- Local Plan indicates limited housing development
 - Bruce Grove (Site 9) within the Town Centre
 - Homefield Rise (Site 11) to the south.
- SPD should increase housing density within town centre envelope with design guidance identifying potential sites for improvement or redevelopment
- Walnuts redevelopment providing residential

- opportunity for different housing typologies one and two bedroom units - attractive to young people - need indicated by Carter Jonas, (for LSEC)
- potential to significantly contribute to the Borough's housing targets,
- reducing pressure on Green Belt and Metropolitan Open Land
- assist in promoting sustainable transport and reduce the reliance on private vehicles,
- increase footfall supporting local businesses.
- Require / exceed space standards to create high quality accommodation.
- New homes should be affordable, and a place to live, not an investment.
- Buy to let should be disincentivised

4 Transport and infrastructure

- holistic transition to active travel and public transport– for multiple health environment economic benefits
 - Adopt Healthy Streets principles.
 - hierarchy of modes of people movement to prioritise most vulnerable users first.
 - Create space for safe active travel - high-quality public realm for walking and cycling – notably routes to the Station
 - improve and increase pedestrian crossings (encouraging walking) - Increased pedestrianised areas, but with some parking and drop off points for disabled and elderly
 - Complete (or partial) pedestrianisation (with some essential drop off points and disabled parking)
 - Support strategic cycle routes to serve the area - including priority measures on approach roads
 - Secure, accessible and CCTV-monitored bike storage space throughout town centre
 - E-bike hire scheme (docks in High St & station).
 - Local Deliveries by eCargo Bike
 - prepare for increased numbers of electric scooters
 - Council-led active travel promotion to support Bromley's Green recovery
 - expansion in bus infrastructure
 - for disabled travellers
 - esp to station
 - shuttle-style services
 - divert buses through Homefield Rise and Gravel Pit Way.
 - Orp station susceptible to railheading
 - Urban centres to be car free / Restrict to EV
 - London Plan (ItPLP) standards for car and cycle parking
 - New residential development to be car free
 - strategy for consolidating car parking over time to reallocate space away from cars
 - Restrict car parking / differential parking charges (EV spaces with charging)
 - Consolidation of deliveries and servicing to town centre - to avoid peak traffic times (BID). (co-ordinated through the BID)
 - 20mph zones in all town centre
 - Anti-idling controls
- sustainable drainage for new highway / footpaths / public realm
- Lobby for ULEZ expansion - ideally the whole borough
- repurpose existing parking for open space, public realm, residential
- green public transport expensive - set infrastructure priorities and allocation of CIL.

- Highways England no comment at this time (highlight advice notes ‘ Streets for All’ 2018)

5 Offices

- Delay the building of new offices until the long-term impact of the Covid-19 crisis on office use is fully understood
- new offices should be multi-use / flexible
- No more office block to residential rabbit hutches

6 Retail, culture and leisure

- Diversification to respond to the changes in the retail environment / complimentary range of uses
 - stronger focus on cultural and leisure facilities strengthen existing
 - support further small and independent operators,
 - meanwhile (temporary uses important during re development) uses
 - markets.
 - Support expansion of night time economy
 - Flexible space to enable community groups and organisations to hire at a low cost
- Developments should deliver / support new spaces for socialising
- Walnuts / Orpington College & Public Realm
 - Increasing the number of residents within Orpington will provide the demand for additional and a wider variety of eateries.
 - strengthen existing cultural and leisure facilities through redevelopment of the Walnuts - a higher quality shopping space / leisure complex
 - expand activities targeted at young adults.
 - civic / community hub with indoor event facilities integrated with library or redeveloped leisure centre.
 - Shopping centre to encompass green initiatives - using renewable energy / shops reducing plastic etc.
 - Awnings over shops - simple devices improved the experience for shoppers in town centres (important re COVID).
 - Identify Orpington College for redevelopment (education and residential)
 - Enable events, markets, mothers with prams, play areas for children, dog free areas, spill out areas
- Regular market, improving social interaction and sense of community
- Complete or partial pedestrianisation of the High Street with parking/drop off allowed for people with particular needs such as the disabled and elderly.
- Increase trees and hedging (shade, mental health, carbon capture and air cleaning)
- Support walk/cycle to increase footfall & local spend
- Increase activity - Sport England's Active Design Guidance includes 10 Active Design Principles <http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

7 Public Realm, Permeability and Connectivity

- SPD should acknowledge the importance of the public realm which
 - adds significant value and distinctiveness - particularly following changes to the retail environment.
 - plays a vital role in keeping us active - Good design should create environments that make the active choice the easy choice for people and communities.

- Public realm should be
 - inclusively designed
 - improve permeability across the town centre.
 - a strengthened link between Orpington Town Centre and the railway station - important for visitors from beyond the local area.
 - support sustainable transport modes
 - Support health through promoting activity
 - attractive, interconnecting public spaces - including for young people
 - support improved connectivity / permeability
 - location to socialise outside
- Public Realm Improvements
 - Create more space to sit and meet.
 - include trees a species capable of growth to exceed building height and managed so to do
 - remove barriers eg steps and steep inclines
 - Security - clean and well lit (renewable energy street lighting) routes to the town centre prioritising pedestrians and cyclists.
 - more outdoor sheltered spaces to allow for more comfortable outdoor activity during autumn and winter
 - Sufficient space (internal/external) in lobbies, corridors, lifts, forecourts, gardens to facilitate social distancing
 - Reduce unnecessary street clutter.
 - Ensure step free access to ALL premises in the town centre (temp ramps where required)
 - Install water bottle re-fill points and more recycling stations.
 - Secure storage for bikes near the shops, stations, leisure centre.
 - Increase electric car charging points.
- Specific Location / Route Improvements
 - Hight St Pedestrianisation
 - increased pedestrianised within the town centre.
 - modal shift - make cycling, waling, public transport preferable to drive
 - Orpington by-pass provides a suitable alternative route for cars, Divert through traffic away from High Street onto Spur Road; restricting traffic entering High Street by War Memorial to buses and cycles, and route cars to car park via Gravel Pit Way
 - OR Equidistant crossings on High Street. Pedestrian priority at side road junctions
 - Review crossings around War Memorial and integrate parallel crossings to connect cycle network
 - Market Square
 - promote role as community hub, public space, for community activity, congregation and engagement
 - surrounding developments should support / enhance its role
 - Routes
 - Cray Valley - connect along valley floor through the town centre core, extending the Cray Riverway and historic Priory Gardens with linear open spaces and pocket parks to link with planned Green Street Greenway to High Elms Country Park.
 - Priory Gardens to new development
 - Green / public spaces to neighbouring estates

- Ped route High Street to station via Knoll Rise (avoiding traffic dominated Station Road).
- New developments should
 - improve links to existing parks and green spaces.
 - create a more walking and cycling friendly environment.
 - promote Market Sq if neighbouring

8 Historic Environment

- SPD should
 - acknowledge benefits, including economic and cultural of the historic environment inc The Priory Conservation Area & Listed Priory
 - Recognise Archaeological Priority Areas / consider archaeological assessment and review
 - Reflect the timeline and rediscover a sense of place - past, present and future - legacy of market gardening, hop growing, plant nurseries
 - protect the historic environment and identify how new development can be accommodated without causing undue significant harm.
- Historic Environment should inform the context of development.
- High density development, of high quality design, is
 - appropriate within the town centre which is sustainably located
 - key to meeting housing targets through greater density opportunities.
- Need to manage potential tall buildings in relation to heritage assets and their setting
- history of the town should be reflected in developments of historical assets but not inhibit development of sites not affecting the historic environment. (eg Walnuts / College)
- Refurbishing of 60s and 70s development would make the high street more attractive
- Attention drawn to HE documents
 - re Tall buildings - Advice Note No 4: Tall Buildings <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4> currently being revised - <https://historicengland.org.uk/whats-new/news/tall-buildings-advice-consultation/>
 - re managing new development and securing good growth for the historic environment - The Setting of Heritage Assets (Good Practice in Planning Advice Note 3) <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>
 - re public realm improvements - Streets for All; Advice for Highway and Public Realm Works in Historic Places (2018) <https://historicengland.org.uk/images-books/publications/streets-for-all/heag149-sfa-national/>

9 Green Infrastructure

- Commitment to the protection of the Green Belt
 - areas of green belt must not be arbitrarily redesignated
 - development must focus on brownfield sites.
- Green spaces support
 - mental health,
 - physical fitness
 - general well being
 - public health
 - coherent and resilient ecological networks, for nature and wildlife, (even small areas allowing species to move).

- manage environmental risks eg flooding and heat waves
- cleaner air
- carbon capture
- Protect & increase existing parks and green spaces
- Increase areas managed for biodiversity and allow some areas to develop naturally
- Encourage strong links in new developments to local green spaces
- Green areas must not be lost
- Green infrastructure
 - Reputationally important to Orpington TC .
 - Vital to ensure that the UK meets its Net-Zero targets by 2050.
 - increasingly popular among young adults (that new res dev may attract).
 - Visually attractive supporting local pride and town centre vitality
 - Is both cost and benefit – funding opportunities (Mayor’s Greener City Fund eg Incredible Edible and Edible Bustop)
- Require provision for Green Infrastructure (GI) within all new development and seek opportunities to retrofit green infrastructure / enhance biodiversity in and around town centre.
 - green roof systems / roof gardens;
 - green walls to provide insulation or shading and cooling;
 - pocket parks
 - new tree / hedge planting to support birds and pollinators, air quality, urban cooling, shade and carbon capture.
 - Replacement trees to provide equal or greater canopy size.
 - management of land to benefit local biodiversity
 - perennial wildflowers and native plants in preference to formal seasonal bed planting /disposal
 - rewilding (with clear signage)
 - natural verges
 - incorporating features for wildlife eg bat roost / bird box / swift bricks
 - Install timer triggered irrigation for planting to reduce plant, tree and water wastage
 - Install water bottle filling sites

10 Environment and Air Pollution

- Reduce traffic
 - Reduce car parking on Orpington High Street
 - High St pedestrianisation & more pedestrian routes to reduce travel within the town centre.
- War Memorial roundabout too polluted and dangerous (note school students, cross there every day)
- New developments / major refurbishments
 - be carbon neutral as a minimum or better still carbon negative
 - utilise sustainable technologies and greener construction methods / building materials
 - high energy efficient standards and renewable energy / heating systems / solar panels
 - ground source heat pumps for central community-wide infrastructure and CHP (Combined heat and power)
 - electric vehicle charging points and cycle storage
- invest in more energy efficient busses.
- Consider adopting sustainable and air quality measures as in other UK towns / cities and towns have taken.

- Promote / require sustainable urban drainage schemes.
- Shopping centres and other businesses to be energy efficient and use green energy tariffs.
- Air quality monitoring stations with publicly visible electronic displays in visible key transport activity locations providing live data to the public
- Restrict
 - hours for bonfires to after 8pm in the winter & after 9pm in the summer.
 - limit or ban the use of polluting rotary mowers as blowers recirculate particulate matter (diesel exhaust, tyre and road wear, brake wear, bonfires, log burners etc) raising ambient pollution levels.

11 Development Opportunities

- Walnuts redevelopment
 - acknowledges location within the Cray Valley renewal area
 - potential for delivery of significant amount of new homes, new jobs, new social infrastructure and improved public realm.
 - Need for high quality design, in keeping with the surrounding character
 - Consider good place making at the heart of successful town centre.
 - Support consultation with the local community.
- Orpington College Campus and adjoining car park
 - opportunity to deliver new residential, education & commercial development
 - landmark tall building to identify Market Square - currently lacks visibility.
 - Space within the Town Centre should be flexible and adaptable

Appendix 3: Summary of Commonplace map responses received

22 responses received (👍 symbol denotes the number of people who agreed with the comments)

The Priory & Priory Gardens	👍
Priory could become a real hub for the community. There is space for Artisans and Eco friendly shopping; a community cafe; displays/information on environmental; sustainable and ethically friendly living; courses/classes ie health, yoga, recycling, upcycling, gardening etc	11
Priory Gardens need a café to make it attractive & Orpington needs places to do courses, yoga, adult education, concerts etc.	2
High Street, Walnuts Shopping Centre	👍
Pedestrianise the High Street to make shopping more pleasant and enable restaurants to grow. Re route buses to the rear	1
One way system in the High Street / pedestrianise (weekends only) - environmentally friendly & allow for better social distancing to support return to high street shopping.	2
Pedestrianise & facilitate outdoor dining without car fumes. Orpington by-pass on Court Road already in place & existing bus stops on Homefield Rise cater for those travelling into Orpington Town Centre. There is ample parking accessible via Gravel Pit Way This will rejuvenate the town centre, improve air quality, reduce pollution, and create a town fit for the 21st century	11
Restrict non bus traffic between certain hours & make it more cycle friendly	1
Pedestrianise the High Street, or restrict to buses, taxis and cyclists. No car parking along the High Street to increase pedestrian safety - drivers to park elsewhere eg Tesco or Sainsbury car parks, which should have EV chargers. Concern about High Street & roads behind / fringe area (flytipping, littering and antisocial behaviour)	2
Pedestrianisation to support those with mobility problems & cyclists. Investment (as in Bromley Town Centre) Note successes elsewhere – markets (Farmers, Flowers, Craft, Eco), Pop -ups etc , - Engaging business & residents to create a sustainable and environmentally aware / friendly centre & 'community' feel for their environment	4
Measures for vehicles introduced a few years ago, don't work – on approach to the War Memorial roundabout traffic is slowed by narrowed High Street leading to dangerous crossing between cars – suggest widen road or encourage vehicles to use Gravel Pit Way / a mini roundabout on A232/ Gravel Pit Way	4
Currently unconnected- two ends to the High Street with the Walnuts in the middle. Suggest free shuttle bus connecting one end to the other / more / better distributed free car and bike parking Restaurants and cinema are great but needs more retail variety	2
Bring back a few limited time free parking places	0

The Walnuts is a very dated - very little to encourage 'mooching' - soulless with bland shops -. Removing cars and buses is key to opening the space up - enabling something like Brixton market, Brixton pop or Croydon/Shoreditch boxpark - more local / independents needed - good coffee shops, children's play, family friendly exercise space / space for events/displays.	8
Orpington is a nice place, but it needs more offering to create a better living for the community - current retail / market stall offer is of very low quality. A a food quarter like Boxpark in Croydon would be a 'phenomenal attraction' .	1
Update the High Street - create festivals, fetes carnivals & fun days bringing people together - old and young	1
More public art - murals, sculptures etc. Better (sheltered) seating. More events like the food festival, Christmas market etc – affordable things to see and do in town	4
Need to re define the High Street. Learn from others eg Hackney Shoreditch -very cheap rents / support for start ups, artists etc to develop the cultural buzz	4
convert cheap temporary shops into housing, & pedestrianise the high street. Events - markets & festivals / eco shops – attractions people will make the effort to travel to	2
Attract some quality retailers back – 'Bring back our High Street!'	0
Lack of shopping facilities all fast food and cafes and charity shops	4
Lack of toilet and/or café facilities in the vicinity of Priory Gardens (and in the park itself) and lack of seating. Over-provision of take-aways. Lack of daytime uses	6

The Walnuts Leisure Centre	
The entrance to the Walnuts leisure centre is not inclusive or prominent. Car & bike via Lych Gate Road / pedestrian access from the shopping precinct involves step access to the side of the building	3

Appendix 4: example of 'Nuts to the Walnuts' standard questionnaire template

NUTS TO THE WALNUTS

June 2022

Email: ldf@bromley.gov.uk

Head of Planning Policy and Strategy

Civic Centre

Stockwell Close

Bromley, BR1 3UH

Dear Sir or Madam

Here is my response to the Consultation on Orpington's Draft Supplementary Planning Document, 2022.

I would like Orpington to have

Also, I feel strongly that (tick as many as are important to you)

no buildings should be taller than Brunswick House (9 storeys)	
the existing Leisure Centre should be updated, or a new one built before it is demolished	
we should make sure we have enough GP surgeries and hospitals for new residents	
we should make sure we have enough schools for new residents	
we should make sure public transport connects all areas well to the town and that it is fully accessible for disabled people	
we have more parking spaces for visitors to the town	
we keep the functioning shops that we have now	
we should keep the character of our small Kent town	

Yours faithfully

Signature: Name in capitals:

Address (number optional):

Post code: