



Bromley Local Plan Review

Direction of Travel (Regulation 18) – July 2025

Bromley Council

Bromley Local Plan Review – Direction of Travel (Regulation 18) – July 2025

For more information about this document, please contact:

Bromley Planning Policy Team

Email: ldf@bromley.gov.uk

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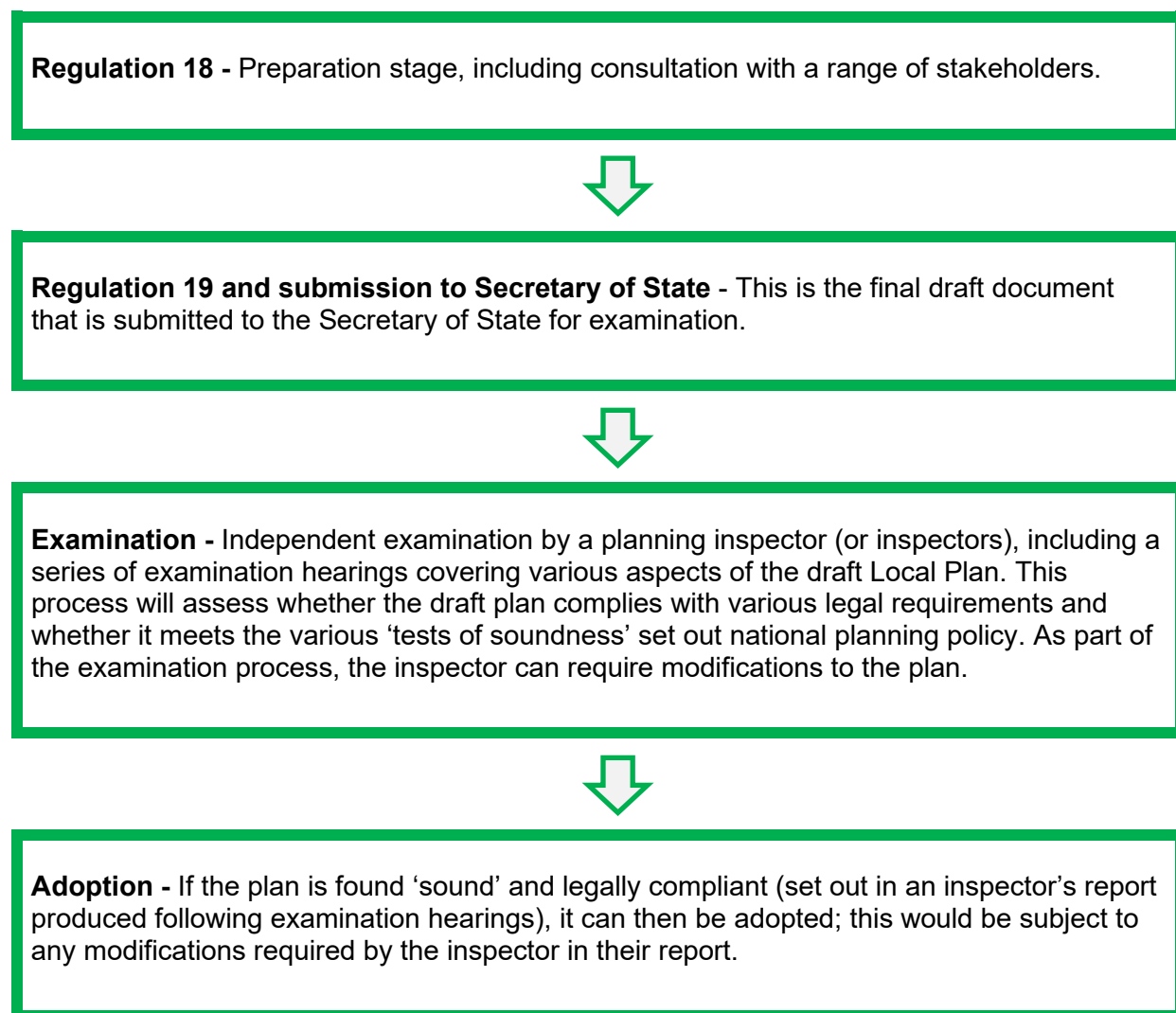
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1. Introduction

- 1.1 The Bromley Local Plan was adopted in January 2019 and sets out planning policies, site allocations and land designations for Bromley. It is the central document in the borough's Development Plan. Planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 1.2 Planning legislation requires local planning authorities to review their Local Plan every 5 years to assess whether it needs updating, to ensure that policies remain relevant and effectively address the needs of the local community. The National Planning Policy Framework (NPPF) 2024 states reviews should take into account changing circumstances affecting an area, or any relevant changes in national policy.
- 1.3 The Bromley Local Plan is now more than 5 years old and since its adoption there has been changes that the Council needs to take account of. This includes a new NPPF published in 2024; a new London Plan published in 2021; and updated social, environmental and economic Council priorities published in the Bromley Corporate Strategy 'Making Bromley Even Better'.
- 1.4 The Council is therefore progressing with a full review of the Bromley Local Plan. The Levelling Up and Regeneration Act 2024 introduced reforms to the process of preparing Local Plans. However, the regulations to enable the implementation of the new plan-making system have not yet come into force. The Bromley Local Plan Review is therefore being prepared under the existing plan-making system.
- 1.5 The process for updating a Local Plan is complex and involves different statutory stages. Figure 1 sets out the process for updating the Bromley Local Plan. The Bromley Local Plan 2019 will still be used for making planning decisions until the new Local Plan is adopted.

Figure 1: Plan making stages



- 1.6 The Council undertook a Call for Sites exercise between August and November 2021 to allow landowners, developers and other interested parties to put forward potential sites for development. The Council is considering the suitability of these sites for development as it prepares the new Local Plan.
- 1.7 The Council then undertook a Regulation 18 'Issues and Options' consultation, which set out relevant changes since the adoption of the Local Plan and how the new Local Plan could respond to these changes. Each chapter in this document summarises the feedback received so far. The accompanying consultation statement sets out a more detailed summary of the comments received and how these comments have informed the Local Plan process so far.

Policy and legislative framework

- 1.8 A Local Plan is produced within a complex planning framework; Figure 2 sets out the relationship between the Local Plan and policy and guidance at regional and national level. Primary planning legislation sets out the basic legal parameters within which the Local Plan should be prepared and subsequently operate. The Development Plan is the key set of documents which inform decisions on planning applications.
- 1.9 In Bromley, the Development Plan consists of any locally adopted Development Plan Documents (such as the Local Plan) and the London Plan (the Spatial Development Strategy prepared by the Mayor of London). Any 'made' neighbourhood plans – those which have been successful at examination and referendum – also form part of the Development Plan; Bromley does not currently have any adopted neighbourhood plans. Secondary legislation provides further detail on the operation of primary legislation. Of particular relevance is the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the process for preparing and adopting a Local Plan.

Figure 2: Relationship to other plans



- 1.10 The NPPF sets out the Government's planning policies for England and how they apply. It provides a framework within which locally prepared plans addressing housing needs and other economic, social and environmental priorities can be produced. The NPPF must be taken into account in preparing the Development Plan; it is also a material consideration in planning decisions, although the weight attributed to the NPPF will depend on the details of each application. Planning Practice Guidance (PPG) provides further detail on policies in the NPPF. A new NPPF was published in December 2024 and the new Local Plan is being prepared to take account of the new NPPF.
- 1.11 The London Plan is a strategic plan for London which sets out a policy framework covering a variety of economic, social and environmental issues. For plan-making, the London Plan provides the strategic, London-wide policy context for all borough Local Development Documents; all such documents including the Local Plan have to be in 'general conformity'

with the London Plan. There are a number of London Plan Guidance (LPG) documents which provide further information about how London Plan policies should be implemented.

- 1.12 The current London Plan was published in March 2021 and is reviewed every 5 years. The Mayor of London is now starting to prepare the next London Plan; the new Local Plan will need to consider the implications of relevant emerging new London Plan policies, including the number of homes the Local Plan needs to plan for. The Mayor launched consultation on the 'Towards a new London Plan' document in May 2025, which is a high level initial consultation on various policy issues that the new London Plan could address. The document notes that the Mayor has commissioned a London-wide Green Belt review to inform potential Green Belt release.
- 1.13 A Local Plan is supported by several documents. The Policies Map will illustrate policies and designations geographically. Implementation of the Local Plan will be monitored through the Authorities Monitoring Report (AMR).
- 1.14 The Council may produce Supplementary Planning Documents (SPDs) to provide further guidance on Local Plan policies. The adopted Planning Obligations SPD, Orpington Town Centre SPD, Urban Design Guide SPD and Bromley Town Centre SPD will continue to be material considerations when considering planning applications.
- 1.15 Section 19 of the Planning and Compulsory Purchase Act 2004 (the PCPA) requires a Local Planning Authority to carry out a Sustainability Appraisal (SA) of the Plan to identify the extent to which it will help to achieve environmental, social and economic objectives. The appraisal should document how different options have been assessed and what likely impacts have been identified. It provides the opportunity to reflect and make alterations to the Plan along the way. The criteria for the determining the environmental effects of proposals is based on the Strategic Environmental Assessment regulations (Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004); these regulations require preparation of a Strategic Environmental Assessment (SEA). The SA will address the SEA requirements and will also include additional relevant criteria for considering social and economic impacts.
- 1.16 The Council has chosen to prepare an Integrated Impact Assessment (IIA) which includes the SA alongside an Equalities Impact Assessment, a Health Impact Assessment and the Habitats Regulation Assessment (HRA). The HRA is an assessment to comply with the Conservation of Habitats and Species Regulations 2017 to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.17 The Local Development Scheme (LDS) sets out the timetable for the preparation of planning policy documents. An updated LDS was published in January 2025. This timetable responds to the Government's submission deadline of December 2026 for plans being prepared under the current plan-making system.

Introduction to this document

- 1.18 This Bromley Local Plan: Direction of Travel document is the next stage in the Local Plan Review and is the second Regulation 18 consultation document. The document outlines the proposed vision and objectives for the new Local Plan and the Council's current preferred policy direction for the spatial strategy, housing, employment, retail and leisure, design and heritage, green infrastructure and open space, social and strategic infrastructure, transport and sustainability and waste policies. However, this document does not contain draft policies. It builds on the previous round of consultation and sets out an overview of the approach the

Council intends to take to address the key issues for each policy topic, informed by a range of evidence base documents. This will continue to be refined as policies are drafted, evidence base documents are finalised and alternative approaches are tested through the Integrated Impact Assessment.

1.19 Each chapter of this document contains:

- An introduction to the policy theme;
- A summary of the current policy position;
- A summary of the consultation feedback received so far;
- A summary of the evidence published so far relating to the topic and information on evidence still being produced;
- The preferred policy direction for the policy theme and the next steps for developing the Local Plan; and
- Consultation questions for the policy theme.

1.20 The Direction of Travel document is accompanied by the Integrated Impact Assessment Scoping Report. This document has been informed by consultation with Historic England, the Environment Agency and Natural England and sets the baseline of environmental, social and economic issues and the broad framework that will be used to assess the Local Plan.

1.21 The document is also accompanied by a consultation statement which summarises responses received during previous rounds of consultation on the emerging Local Plan.

1.22 The new Local Plan will be informed by an extensive evidence base. Some of these documents are completed and have been published alongside this document, while other evidence base documents are underway. Each chapter sets out how these evidence base documents have informed the policy direction and will inform future policies.

How to take part in the consultation

1.23 Each chapter contains a series of consultation questions. Feedback from these questions and any other comments on the Direction of Travel document will inform the next version of the new Local Plan (Regulation 19).

1.24 Consultation on this document is taking place from 25 July 2025 to 26 September 2025. Comments can be submitted by using the online response form available at www.bromley.gov.uk/localplanreview, by email to: ldf@bromley.gov.uk or by post to: Head of Planning Policy and Strategy, London Borough of Bromley, Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley, BR1 1AS. Details of the consultation events are available on the website.

Next steps

1.25 Following the completion of the current round of consultation, the Council will prepare the Regulation 19 Submission Version of the Local Plan. This will be a full draft with policies and site allocations and will be the version the Council intends to submit for examination. The Council will continue to prepare the evidence base to inform and justify the proposed policy approach; all relevant evidence will be published alongside the Regulation 19 Submission Version. As set out in the LDS, consultation on the Regulation 19 Submission Version of the Local Plan is intended to take place in Q2 2026 to enable the Council to submit the draft Local Plan for Examination by December 2026.

2. Vision, Objectives and Spatial Strategy

- 2.1 A Local Plan should contain the strategic priorities for the development and use of land in the authority's area. The NPPF requires plans to promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change and adapt to its effects. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for:
- homes (including affordable housing), employment, retail, leisure and other commercial development;
 - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - community facilities (such as health, education and cultural infrastructure including libraries and theatres); and
 - conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.2 The NPPF states that strategic policies should look ahead over a minimum period of 15 years from the adoption of the Local Plan, and should provide a clear strategy for addressing objectively assessed needs over the plan period. This should include planning for and allocating sufficient sites to help deliver the strategic policy objectives.
- 2.3 The Spatial Strategy in the new Local Plan will set out the strategic and spatial policy approach to enable the delivery of the vision and objectives for the borough. It will identify the strategic focus for growth and change and the main locations of development, while ensuring conformity with the national and regional planning policy.

What is our current policy approach?

- 2.4 The adopted Local Plan is underpinned by the overall vision for the borough through to the 2030s; this vision is aspirational yet realistic, and identifies key priorities for the Council, each with more detailed visions and objectives which the Local Plan will help deliver through its policies, site allocations and designations.

Vision – Bromley 2030s

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

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

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

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

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

2.5 The Spatial Strategy in the adopted Local Plan identifies locations for strategic development and, in broad terms, locations for growth, areas with significant opportunities for change and enhancement, as well as areas where protection and more constrained development is anticipated. The focus for the current Spatial Strategy is:

- Bromley Town Centre – a focus for sustainable growth of retail, office, homes, and leisure and cultural activities.
- Cray Business Corridor - the main industrial and business area within the Borough, providing accommodation for a full range of businesses, and improving the offer for modern business.
- Biggin Hill Strategic Outer London Development Centre (SOLDC), a cluster of businesses focused on aviation and high-tech related industries.
- Crystal Palace SOLDC.
- Protect and enhance the quality and character of all Bromley's Places.
- Protect and enhance the Borough's varied open spaces and natural environment.
- Improvement of Renewal Areas.
- Maintain and enhance the network of town centres, local centres and neighbourhood parades.

What feedback have we received so far?

2.6 The main issues raised during the Issues and Options consultation relating to the Local Plan vision, objectives and spatial strategy were as follows:

- Respondents considered that there should be a greater commitment to meeting future housing needs, with a greater focus on family and affordable housing and meeting the needs of different groups including people with disabilities, young people and older people.
- A number of responses suggested that development should be focussed on brownfield sites in highly accessible and town centre locations, particularly Bromley Town Centre.
- Town centres and high streets should be supported, including through mixed-use development.
- There was support for protection of the borough's Green Belt, Metropolitan Open Land, open space, trees and woodlands, but some respondents thought that development in the Green Belt should be considered to meet housing and employment needs, particularly where sites are accessible by both public transport and the road network.
- Comments received on the plan vision noted that the vision should encourage economic growth in a range of sectors, support market-led and carbon-neutral employment development and acknowledge the role of Biggin Hill and the Cray Valley; and that it should reflect climate change, flood risk and reducing emissions as well as air and noise pollution.

- Respondents considered that development should reflect the varied character of the borough and high-density and high-rise development should be resisted. There was support for the protection and enhancement of the borough's heritage assets.
- The impact on infrastructure, including the need for infrastructure improvements such as schools, hospitals, community facilities, health clinics and the strategic road network, needs to be considered.
- Some responses suggested that the Local Plan should support measures to improve public transport and transition to electric vehicles (EVs) and improve safety for walking and cycling, while others noted the continued importance of providing car parking as part of new development.

Evidence base

- 2.7 The following evidence base documents are being prepared to inform the new Local Plan vision, objectives and spatial strategy policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 1: Bromley's Vision, Objectives and Spatial Strategy evidence

Evidence base document	Status
Bromley Characterisation Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Strategic Housing Market Assessment	In progress, intention to publish with Regulation 19 draft (Summer 2026).
London-wide Strategic Housing Land Availability Assessment	In progress (led by the GLA), intention to publish with Regulation 19 draft (Summer 2026).
Bromley Retail and Leisure Study	Complete, to be published alongside Regulation 18 draft (Summer 2025).
Bromley Employment Land and Space Study 2024	Complete, to be published alongside Regulation 18 draft (Summer 2025).
Bromley Strategic Flood Risk Assessment	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Infrastructure Delivery Plan (IDP)	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Green Belt, Metropolitan Open Land and focused Urban Open Space study	In progress, intention to publish with Regulation 19 draft (Summer 2026)

- 2.8 The Bromley Strategic Housing Market Assessment (SHMA) will provide housing need evidence to underpin the adopted Local Plan. The assessment will examine the overall need, size, type and tenure of housing needed for different groups in the borough, in line with the NPPF and PPG. However, the number of new homes that the new Local Plan will need to plan for (the housing requirement figure, or housing target) will be set through the new London Plan. This is informed by the London-wide Strategic Housing Land Availability Assessment (SHLAA) which assesses potential housing capacity across London. The Greater London Authority are currently preparing the SHLAA, with input from each London Borough.
- 2.9 The Bromley Retail and Leisure Study will identify the retail and town centre needs of the borough including an assessment of quantitative floorspace need.
- 2.10 The Employment Land and Space Study 2024 (ELSS) provides an up-to-date assessment of future employment floorspace and land needed to accommodate economic growth in Bromley

based on industry-accepted economic projections. The ELSS identifies a net floorspace requirement of approximately 33,000sqm to 63,000sqm of employment floorspace across the borough.

- 2.11 The NPPF requires strategic policies to be informed by a Strategic Flood Risk Assessment (SFRA) and for development to be directed away from areas at highest risk (whether existing or future). An updated SFRA is being produced and will inform the Spatial Strategy and site allocations to steer development away from areas with the highest flood risk and ensure that development is made safe for its lifetime without increasing flood risk elsewhere.
- 2.12 As required the NPPF, the Council is undertaking a review of its Green Belt, Metropolitan Open Land and selected Urban Open Space sites. This review is looking at the extent to which Bromley's Green Belt, Metropolitan Open Land and selected Urban Open Spaces perform and contribute to their respective functions. It will also consider the implication of the introduction of 'grey belt' in the NPPF.
- 2.13 The Bromley Characterisation Study is being prepared in order to ensure consistency with London Plan 2021 policy D1. The study will provide an analysis of the borough to provide an understanding of the attributes that make Bromley what it is today, how its character varies across the borough and how this local distinctiveness might inform future approaches to managing change and growth. The assessment will be based on a series of places and neighbourhoods that share similar characteristics.
- 2.14 The Council is working in partnership with infrastructure providers and other public sector organisations to identify necessary infrastructure and service requirements needed to support development in Bromley. The Infrastructure Delivery Plan (IDP) sets out the known key infrastructure requirements currently deemed necessary for the successful implementation of the Local Plan. This includes working with the NHS to understand requirements for any new health infrastructure and with the Council's Place Planning Service to understand any need for new schools.

What is the Council's preferred policy direction?

- 2.15 The new Local Plan vision will set out what Bromley will be like as the Local Plan is implemented over the plan period, which is intended to cover 2026 to 2041.
- 2.16 The proposed vision and objectives for the new Local Plan have been developed from the Council's Corporate Strategy 'Making Bromley Even Better 2021 – 2031', to align with Council priorities. Together they will form the basis for the policies and site allocations in the Local Plan. The proposed vision and objectives are set out below.

Vision

A fantastic place to live and work, where everyone can lead healthy, safe and independent lives.

Objective 1: For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.

- A. Support the appropriate provision of land and facilities to deliver high quality education and training.
- B. Ensure that Bromley's public spaces and streets are designed to be safe, healthy, welcoming and accessible, with adequate play space and facilities that meet the needs of children and young people.
- C. Require buildings and public spaces to be designed to protect children and young people from poor air quality.

Objective 2: For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.

- A. Create accessible and healthier environments to support people to live fuller, longer and healthier lives and to reduce health inequalities.
- B. Ensure housing is adaptable to meet the needs of residents as the population ages, including through the provision of supported and older person housing.

Objective 3: For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.

- A. Deliver an appropriate supply of homes in sustainable locations that meet the varied needs and incomes of Bromley's residents.
- B. Support the local economy through an appropriate supply of commercial land and flexible, quality business premises that meets modern industry needs, particularly in the borough's key industrial locations.
- C. Support the role of Bromley's town centres and local parades and ensure provision of a diverse range of shops, services and leisure uses in these areas.
- D. Protect and enhance the borough's community facilities as places to come together and to deliver services that meet the needs of residents, and to help address any pockets of deprivation in the borough.

Objective 4: For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.

- A. Manage, protect and enhance the borough's natural environment, including its Green Belt, Metropolitan Open Land, Urban Open Space and other open spaces, habitats, landscapes and biodiversity.

- B. Improve the quality and accessibility of open space and increase provision, particularly in areas of deficiency.
- C. Ensure development complements and enhances local character and the historic environment, delivers high quality design and minimises its environmental impact.
- D. Improve the resilience of buildings and communities to cope with a changing climate, ensuring flood risk and the impact of extreme weather is managed and minimised.
- E. Support the development of local energy networks and low-carbon and renewable energy generation.
- F. Reduce air, noise and light pollution and ensure contaminated land can be remediated where possible.
- G. Reduce road congestion and encourage patterns of development that ensure good access to public transport and are safe for pedestrians and cyclists.

Objective 5: To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.

- A. Use planning obligations and the Community Infrastructure Levy alongside other suitable funding mechanisms to support the delivery of infrastructure, facilities and services in partnership with internal and external stakeholders.
- B. Secure investment in critical public transport infrastructure to improve connectivity to and from Bromley.
- C. Ensure Bromley's public realm is well-designed and well-managed.
- D. Support the digital economy and ensure businesses and residents have the required utilities.
- E. Reduce the amount of waste that ends up in landfill, particularly biodegradable waste, and increase self-sufficiency.

- 2.17 The Spatial Strategy will set out the strategic and spatial approach to delivering the vision and objectives. It will set out the location, scale and type of development that will come forward in Bromley over the plan period. The new Local Plan will be clear on what policies are considered strategic and non-strategic.
- 2.18 The Spatial Strategy, along with the housing policies and site allocations, will set out where development will be directed to in order to meet the borough's housing needs. The Council will continue to prioritise brownfield land to protect the borough's Green Belt and Metropolitan Open Land from inappropriate development. This means development to meet the borough's needs will still be directed to Bromley Town Centre and other town centres. Biggin Hill airport and the Cray Valley will remain strategic locations for employment and industrial uses. Town centres will be prioritised for retail and other town centre uses.
- 2.19 The Green Belt, Metropolitan Open Land and selected Urban Open Space review will assess Bromley's Green Belt, including identifying 'grey belt' land. Any 'grey belt' release will only be considered once all other options for meeting these development needs have been explored (e.g. on brownfield sites).
- 2.20 The Spatial Strategy will be underpinned by the Characterisation Study, which will identify different areas with similar characteristics, their capacity for growth and where character should be conserved, enhanced or transformed. The Local Plan will also look at the role of small sites in delivering new housing and areas suitable for tall buildings. The Spatial Strategy will be supported by a series of place-specific policies, which will provide further detail on how

growth and change is expected to be delivered and managed in different parts of the borough. Not all places are expected to experience growth, but the policies will give full coverage of the borough. These policies will replace the Renewal Area policies in the adopted Local Plan.

- 2.21 The Council will allocate sites for the development of particular uses, to assist with meeting identified development needs. The Local Plan will not identify every potential development site in the borough but will focus on sites which can contribute to meeting any identified needs, including larger sites that will deliver significant amounts of development such as housing or employment space. Sites will be identified for a variety of uses to meet local need and support Local Plan objectives and may include specific design principles for each site. A number of sites have been submitted as part of previous consultations. The Council will consider all sites submitted for potential allocation, taking into account how the site accords with the Spatial Strategy as well as other relevant evidence base documents.
- 2.22 High-quality design and ensuring development is supported by necessary infrastructure are key priorities for the Local Plan. The Council has identified six overarching principles that are considered essential components in delivering good design and which represent the key characteristics of successful well-designed places: contextual, responsive, connected, inclusive, healthy and sustainable. These principles are set out in the adopted Urban Design Guide SPD and will be incorporated into a strategic policy in the Local Plan to ensure that all development delivers high-quality design.
- 2.23 The Council will secure developer contributions to support the delivery of infrastructure, facilities and services to meet needs generated by the development and to mitigate the impact of development. The Council will also work in partnership with infrastructure providers and other public sector organisations to identify necessary infrastructure and service requirements needed to support development in Bromley. The Infrastructure Delivery Plan (IDP) will set out the known key infrastructure requirements currently deemed necessary for the successful implementation of the Local Plan.
- 2.24 The Council will regularly monitor the implementation of the Local Plan, in particular the effectiveness of the policies in delivering the vision and objectives for the borough. This monitoring will be published in an annual Authority Monitoring Report with monitoring indicators set out in the new Local Plan.

<p>Summary of the Council's preferred policy direction for the Vision, Objectives and Spatial Strategy.</p>
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| <ul style="list-style-type: none"> 1. Align the Local Plan vision and objectives with the Council's Corporate Strategy 'Making Bromley Even Better 2021 – 2031'. 2. Continue to prioritise brownfield land to meet the borough's needs for housing, employment, retail and other uses. 3. Identify the opportunities for change and growth in different parts of the borough through place-specific policies that continue to protect and enhance local character. 4. Allocate sites that will contribute to meeting the borough's development needs, specifying the uses that should come forward on each site. 5. Require new development to be of high-quality design and be in accordance with the six Bromley Design Principles which will be adapted from the principles in the adopted Urban Design Guide SPD. |
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6. Secure developer contributions to support the delivery of infrastructure, facilities and services to meet needs generated by the development and to mitigate the impact of development.
7. Continue to monitor the effectiveness of the Local Plan policies through the annual Authority Monitoring Report.

Consultation questions – Vision, Objectives and Spatial Strategy

1. Do you have any comments on the Council's vision, objectives and spatial strategy evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the vision, objectives and spatial strategy in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for the vision, objectives and spatial strategy?
4. Is there an alternative policy direction that you consider the Council should follow in relation to the vision, objectives and spatial strategy? Please provide justification to support any suggested alternative policy direction.
5. Do you wish to put forward a potential development site for allocation, for development of housing, employment and retail uses or any other uses? There is no guarantee that sites submitted as part of this consultation exercise will be allocated; all sites will be subject to detailed assessment against relevant legislation and guidance as part of the Local Plan preparation process. Where sites are considered to warrant allocation, these will be consulted on in a future consultation exercise. Please note, if you have submitted a site for consideration as part of a previous call for sites exercise, there is no need to resubmit as the site will be considered based on this previous submission.
6. Do you have any other comments that are relevant to the preparation of the new Local Plan vision, objectives and spatial strategy?

3. Housing

- 3.1 In supporting the Government's objective of significantly boosting the supply of homes, the NPPF sets out that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim is to meet an area's identified housing need, including an appropriate mix of housing types for the local community. This includes making as much use as possible of previously developed or 'brownfield' land. In exceptional circumstances, including where an authority cannot meet its identified need for homes, local planning authorities should review Green Belt boundaries in accordance with policies in the NPPF.
- 3.2 The London Plan 2021 currently seeks to address housing need strategically across London through delivering borough annual housing targets for self-contained and non-self-contained units on brownfield sites. The delivery of well-designed housing on suitable large and small sites is essential to ensure London's housing needs are met for all groups in housing need.
- 3.3 Of importance in relation to housing delivery in the borough is the need to take account of the different roles and character of different areas, protecting Green Belt and open spaces and encouraging the effective use of land by reusing land that has been previously developed. New housing must follow a design-led approach to deliver high quality dwellings and higher density housing is often more appropriate in more accessible locations.

What is our current policy approach?

- 3.4 The Bromley Local Plan sets out policies covering all aspects of housing, including identifying housing targets and suitable locations for housing; setting out affordable housing requirements; and providing guidance on housing design, residential extensions and conversions.
 - Policy 1 sets a broad range of locations where new housing will be developed to meet the Borough housing target, including allocated sites and town centres. Delivery of housing on small sites – less than 0.25 hectares – is also identified as an important element of housing supply. The Bromley Town Centre Opportunity Area is identified in the Local Plan and London Plan 2021 as an area for housing growth, with an indicative target of 2,500 homes to be delivered.
 - Policy 2 sets out the threshold for affordable housing provision, and policy on the required affordable housing tenure and housing size mix, informed by a Strategic Housing Market Assessment (SHMA). The policy mirrors the approach set out in the London Plan 2021, whereby provision above 35% that also addresses other policy requirements is not required to provide viability evidence to justify the proposed provision. Exceptional circumstances where the Council would accept off-site affordable housing or payments in lieu are also set out.
 - Policy 11 supports the provision of specialist and older people's accommodation. Policy 12 allocates a number of sites to help meet an identified need for Gypsy and Travellers and Travelling Showpeople and sets out criteria that any new sites should accord with.
 - A number of Local Plan policies relate to householder applications, including Policy 6 on residential extensions and Policy 9 on conversions. Policy 3 concerns backland and

garden land development, setting out that residential development will only be considered in these locations where specific criteria is met.

What feedback have we received so far?

3.5 The main issues raised during the Issues and Options consultation relating to the Local Plan housing chapter were as follows:

- There was support for prioritising brownfield sites in sustainable locations to meet housing need, including mixed use developments.
- Some representations supported high density housing development and taller buildings in town centres. However, other responses considered that tall buildings in the town centre and high street should be resisted, and the development of smaller sites and infill sites should be encouraged, particularly housing proposals that related to existing surrounding development and maintained residential character.
- Some respondents suggested that a review of Green Belt boundaries should be undertaken for housing purposes after considering brownfield land. However, other representations specified that housing and commercial development in the Green Belt should be avoided unless there is a positive/substantial environmental gain, and emphasised that Green Belt, local parks and green spaces should be protected.
- Some respondents also suggested prioritising development in Renewal Areas which are the most deprived areas of the borough.
- Reference was made to housing need figures for the borough and a lack of a five year housing land supply including a lack of affordable housing delivery in recent years.
- A number of respondents noted the need for genuinely affordable housing for social-rented and low cost home ownership units to be prioritised at 35% or higher where appropriate (including affordable family housing and key worker housing) and delivered on smaller sites where viable. Delivery of affordable housing should reflect the need on the current housing register. The viability issues of major schemes should also be recognised.
- However, concern was raised regarding the delivery of affordable homes on smaller sites as set out in paragraph 64 of the 2021 NPPF.
- Some responses noted that large housing developments could result in increased pressure on existing infrastructure, and that there is a need for more social infrastructure (e.g. education, health leisure, transport and water).
- Responses suggested that a mix of housing sizes (self-contained, non-self-contained and temporary accommodation) should be considered including family housing. Evidence should be used to determine what housing size, types and tenures are prioritised. A flexible approach to respond to changing needs for housing is required.
- Use empty properties and/or surplus employment premises for housing purposes was suggested, as was provision of modular housing.
- The importance of a design-led approach and setting out specific design requirements for new housing developments was noted, including green design and sustainable design features. Design guidance should not be too prescriptive, and importance should be placed on providing amenity space within new developments.
- Comments were received suggesting that the potential for other types of housing should be explored, such as housing for older people, students, build to rent and housing for vulnerable groups.
- For older persons accommodation specifically, it was noted that there is a lack of accommodation for older people and C2 care homes. Additional housing for these components of housing supply could free up larger family homes.
- A respondent noted the requirement to identify needs of the Romany Gypsy, Travellers and Showpeople community in the new plan.

- Other respondents suggested that there should be more opportunities for self-build properties to help meet housing targets in line with NPPF guidance.

Evidence base

- 3.6 The following evidence base documents are being prepared to inform the new Local Plan housing policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 2: Bromley's housing evidence

Evidence base document	Status
Bromley Strategic Housing Market Assessment	In progress, intention to publish with Regulation 19 draft (Summer 2026).
London-wide Strategic Housing Land Availability Assessment	In progress (led by the GLA), intention to publish with Regulation 19 draft (Summer 2026).
London-wide Gypsy and Traveller Accommodation Needs Assessment	In progress (led by the GLA), intention to publish with Regulation 19 draft (Summer 2026).
Bromley Green Belt, Metropolitan Open Land (MOL) and focused Urban Open Space Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).

- 3.7 A Strategic Housing Market Assessment (SHMA) has been commissioned to update the previous 2014 South East London SHMA that provided housing need evidence to underpin the adopted Local Plan. The assessment will examine the overall need, size, type and tenure of housing needed for different groups in the borough, in line with the NPPF and Planning Practice Guidance (PPG). The findings will help inform housing planning policies in the Local Plan including policies on affordable housing tenure split and housing size mix.
- 3.8 The housing targets in the London Plan 2021 were derived through the 2017 London Strategic Housing Land Availability Assessment (SHLAA) process, which included an assessment of large sites (0.25 hectares and above) and small housing sites (less than 0.25 hectares) across all London boroughs. The difference in housing completion targets across London reflects varying constraints. The current annual housing completion target for Bromley is 774 units including a small site target of 379 units.
- 3.9 The London Plan 2021 is being reviewed and, as part of this review, a new SHLAA will be prepared to inform updated housing targets. New draft housing targets are unlikely to be known until late 2025 at the earliest.
- 3.10 A Green Belt, MOL, and focused Urban Open Space study has been commissioned to assess existing Green Belt, MOL and specific Urban Open Space designations against relevant criteria. The study will identify how the designations are performing against the criteria, including identifying 'Grey Belt' land which should be prioritised where release of Green Belt land is considered necessary to meet housing needs, as set out in the NPPF.
- 3.11 The Infrastructure Delivery Plan (IDP) makes reference to the planned growth for housing during the Local Plan period to help determine what infrastructure is required to support

growth in the borough. The IDP looks at available funding sources for relevant infrastructure delivery and identifies any gaps that can be supported by Bromley Community Infrastructure Levy and other funding sources.

- 3.12 The Local Plan Viability Study will assess the ability to deliver proposed housing policy objectives. The study will analyse the current and future market ability to deliver emerging policy requirements, for example, affordable housing as part of major and minor applications including housing. All financial and non-financial requirements which the Council places upon developers will be tested.

What is the Council's preferred policy direction?

- 3.13 The new London Plan will establish a new annual housing requirement target for the borough, which would need to be reflected in the draft Local Plan. In advance of this new target being established (and uncertainty about when it would apply from), the emerging Bromley Local Plan intends to rely on the existing London Plan target of 774 units per annum up to 2028/29 and rolled forward beyond this. This approach is supported by footnote 88 of the NPPF, which states that, in areas where there is an operative Spatial Development Strategy (SDS) which provides the housing requirement for relevant local areas, the SDS will continue to provide the housing requirement for the relevant emerging local plans.
- 3.14 The Council will seek to meet targets during the plan period, through prioritising the development of brownfield land and ensure that sites are optimised, including town centre sites, mixed-use sites and small sites across the borough. The new Local Plan will allocate specific sites for housing delivery, informed by previous call for sites submissions where appropriate, as well as other sources of site identification.
- 3.15 The new Local Plan will reflect the design-led approach to ensure the delivery of high quality dwellings can be delivered, in line with London Plan 2021 policies D3 and D4. The new Local Plan will also seek to provide a range of unit sizes to help meet housing size priorities (including family sized units).
- 3.16 The Local Plan will follow the threshold approach to affordable housing as set out in the London Plan 2021, but the potential for increased delivery of affordable housing will be robustly investigated in the Local Plan viability study. The Council will also set out that affordable housing should be provided on site unless exceptional circumstances can be demonstrated. The potential for affordable housing contributions from smaller sites will also be investigated.
- 3.17 As part of any affordable housing that is secured, the Council will seek to maximise the proportion of social rented accommodation; the adopted Local Plan includes a 60/40 social-rented/intermediate tenure split, but the Council is keen to explore the potential for a 70/30 tenure split, where justified by housing and viability evidence.
- 3.18 The conversion of existing residential dwellings to provide a greater number of dwellings; and optimisation of backland sites, have both made an important contribution to housing supply in the past. These sources of supply will continue to be promoted, but the Council will seek to ensure that any proposals are subject to detailed criteria including assessing the impact on existing and future residential amenity and ensuring the continued provision of family units.
- 3.19 The Council will seek to ensure that proposals for specialist and older person accommodation address a need for the type of housing proposed, provide affordable housing where relevant in accordance with London Plan 2021 policies H5 and H13, are sustainably located and include suitable amenity space. Any proposals for the loss of specialist or older person

accommodation would need to demonstrate there is no longer a need for the housing and would be subject to an appropriate marketing period. Alternatively, any loss could be addressed by replacing equivalent floorspace in an alternative appropriate location.

- 3.20 A London-wide Gypsy and Traveller Accommodation Needs Assessment is currently being undertaken and will help to inform the Local Plan policy on Travellers (including Gypsies, Travellers and Travelling Showpeople). It is anticipated that Bromley's traveller need will be met through allocated sites in the new Local Plan.
- 3.21 The Council intends to prepare local policies relating to purpose built student accommodation, purpose built private rented sector development (build to rent), and large-scale purpose built shared living accommodation (co-living). These policies will take account of policies in the London Plan as well as relevant local evidence in the updated Bromley SHMA.
- 3.22 The new Local Plan will include a policy relating to self-build and custom housebuilding to assist with meeting the requirements of the Self-Build and Custom Housebuilding Act, provided such development can demonstrate it has optimised the use of a site.
- 3.23 The new Local Plan will also include a specific policy on houses in multiple occupation (HMOs). HMOs are an important part of London's housing offer and reduce pressure on other elements of the housing stock, but they can give rise to concern including potential amenity impacts and issues with poor quality accommodation. The new policy could consider a range of issues including the impact on residential amenity and character and appearance, importance of good quality accommodation, the need for safe and secure access, highways safety issues and any impact on the supply of family housing.

Summary of the Council's preferred policy direction for housing

1. Seek to meet housing targets through prioritising development on brownfield land.
2. Optimise housing development on appropriate sites including site allocations, town centre sites, mixed-use sites and small sites.
3. Adopt a design-led approach to ensure dwellings are of a high quality and deliver a range of dwelling sizes.
4. Follow the threshold approach to affordable housing and seek to maximise the amount of social rented accommodation provided.
5. Set out robust criteria for the conversion of existing residential units and the development of backland sites and garden land.
6. Support the provision of specialist and older person accommodation that helps meet identified needs; and resist the loss of specialist and older person accommodation unless robustly justified.
7. Ensure that the need for traveller accommodation is addressed through the allocation of specific sites.
8. Prepare local policies relating to purpose built student accommodation, purpose built private rented sector development (build to rent), and large-scale purpose built shared living accommodation (co-living).
9. Support self-build and custom build housing that optimises housing delivery and meets unmet demand identified on the Council's Self-Build Register.

10. Set out suitable criteria to assess proposals for new HMOs.

Consultation questions - Housing

1. Do you have any comments on the Council's housing evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the housing policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for housing?
4. Is there an alternative policy direction that you consider the Council should follow in relation to housing? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan housing policies?

4. Design and Heritage

- 4.1 Good design is a key aspect of sustainable development and is indivisible from good planning. Design quality is important at every scale, from the detail of individual buildings to the layout, form and function of large-scale developments and wider spatial strategies and masterplans. Good design is key to creating successful well-designed places that benefit people and communities.
- 4.2 Understanding context, responding to place, and reinforcing local character and distinctiveness are key elements of good design. Bromley has a rich historic landscape and a strong architectural heritage, reflected by the significant number of designated Conservation Areas, Areas of Special Residential Character, important archaeological sites, protected Green Belt countryside, and highly valued parks and open spaces, which collectively contribute to Bromley's distinctive character and identity.
- 4.3 Bromley aspires to the highest standards of architectural design quality. The overriding vision is to support opportunities for sustainable growth, whilst ensuring that the existing character and identity of the borough is enhanced and retained.

What is our current policy approach?

- 4.4 Chapter 5 of the Local Plan – Valued Environments – sets out the planning policies which protect and enhance the natural, built, and historic environment of the borough.
- Policy 37 sets out general design requirements and provides specific criteria in relation to architectural quality (scale, form, layout and materials), context (townscape character and heritage), spaces between buildings (hard and soft landscaping), amenity (daylight and sunlight), access and inclusion, and sustainable design and construction.
 - Policy 47 sets out further general design requirements, requiring tall and large buildings to make a positive contribution to the immediate setting and the wider townscape, appropriate to their location/context and to be of the highest architectural design quality. Policy 48 requires development to protect or enhance specific views and landmarks.
 - Policies 38 to 46 include requirements for statutory listed buildings, locally listed buildings and non-designated heritage assets, conservation areas and areas of special residential character, in order to preserve and enhance the character and appearance of valued assets and distinctive settings.
 - General design guidance is supplemented with specific policies related to various Local Plan topic areas. Policy 4 provides detail on housing design, stating that all new housing developments will need to achieve a high standard of design and layout while enhancing the quality of local places, and respecting local character, spatial standards, physical context and density. The policy includes specific requirements on space standards and accessibility, reflecting London Plan policy. Policies 6, 8 and 9 of the Local Plan concern residential extensions, side space and conversions; the policies set out design criteria and other requirements to guide these types of householder development.
 - Policies on other topics such as green infrastructure, social infrastructure, sustainable design and transport also include specific requirements on design. Similarly, policies 119, 121 and 122 concern noise pollution, ventilation and odour control and light pollution, issues which are all relevant to design.

- 4.5 The Urban Design Guide SPD provides further guidance on Development Plan urban design policies, to inform and engage developers, applicants, planning officers and other interested parties in bringing forward proposals for development in Bromley. The aim is to promote good quality design for buildings, landscape, and public realm, establishing the desired characteristics for successful places and providing a quality benchmark for how new development should look and feel.

What feedback have we received so far?

- 4.6 The main issues raised during the Issues and Options consultation relating to the Local Plan design and heritage chapter were as follows:
- Concerns in relation to the siting and design of tall buildings and high density development were raised – in particular, the potential for tall buildings to negatively impact on local character.
 - Respondents considered that the design and appearance of new development should be of a high quality and in keeping with local character and identity / sympathetic to its surroundings.
 - There was support for a Borough Wide Characterisation Study.
 - The existing policy protections for Bromley's historic environment were considered to be appropriate. Responses noted the importance of protecting local heritage assets and Conservation Areas. Several responses suggested additional protections for heritage areas.
 - There was support for adopting a design-led approach to new development. Various views expressed in relation to appropriate architectural styles, including comments reflecting individual tastes and preferences.
 - Respondents noted the importance of providing green infrastructure and amenity space as part of the design of new development.
 - There was general support for site-specific design parameters and the use of Design Codes.

Evidence base

- 4.7 The following evidence base documents are being prepared to inform the new Local Plan design and heritage policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 3: Bromley's design and heritage evidence

Evidence base document	Status
Bromley Characterisation Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Tall Building Strategy	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).

- 4.8 London Plan 2021 policy D1 requires boroughs to undertake area assessments to define the characteristics, qualities and values of different places within the plan area to develop an understanding of an area's capacity for growth. The Bromley Characterisation Study will set

out a description of the physical form of the borough, its history, evolution, places, spaces, buildings and landscape. This analysis helps to provide an understanding of the particular attributes which make Bromley what it is today; how its character varies across the borough; and how local distinctiveness might inform future approaches to managing change and growth.

- 4.9 London Plan 2021 policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development in principle and their appropriate heights, subject to meeting the other requirements of the Plan. Much of the borough is unsuitable for tall buildings due to its suburban character, however, potential may exist in more urban town centre locations which benefit from good transport links and have an existing urban character. The Tall Building Strategy, informed by analysis documented within the Bromley Characterisation Study, will identify locations that may be potentially suitable for tall buildings, and set appropriate/maximum height parameters.
- 4.10 The Infrastructure Delivery Plan (IDP) includes a section related to heritage and public realm, which will support policies that seek to improve heritage assets and the borough's public realm. The Local Plan Viability Study will assess the ability to deliver proposed design and heritage policy objectives.

What is the Council's preferred policy direction?

- 4.11 In order to ensure that the vision and objectives of the new Local Plan are realised, it is imperative that all new development delivers high quality design at every scale. All major development proposals will be required to respond to the Council's six overarching design principles outlined in the Spatial Strategy and Bromley Urban Design Guide SPD.
- 4.12 The Council will strive to ensure that all forms of development deliver high quality design by placing a greater emphasis on the importance of establishing, delivering and maintaining design quality. In accordance with London Plan 2021 policy D3, development proposals will be required to adopt a design-led approach which takes full account of local character and context. The Bromley Characterisation Study will be a key point of reference. Development proposals will also be required to adopt a people focused approach in order to deliver safe, inclusive, accessible, functional and resilient places.
- 4.13 Development proposals that include new and/or improvements to existing public realm spaces will be required to make a positive contribution to local character and distinctiveness in accordance with the design principles.
- 4.14 The Council will continue to seek to conserve and enhance the value and significance of the Bromley's historic environment with policies protecting Conservation Areas and their settings, Areas of Special Residential Character, historic parks and landscapes, and designated and non-designated heritage assets which contribute significantly to the borough's character, identity, and sense of place.
- 4.15 Tall buildings can help to facilitate wider regeneration benefits and aid future growth by optimising the development potential of sites to provide new housing and commercial space at increased densities. However, they can also have detrimental visual, functional, and environmental impacts. The Council will seek to strengthen existing policy requirements, including views of local importance, to enable more robust assessments of tall buildings. Definition, location, and design requirements will be informed by the Tall Building Strategy and London Plan 2021 policy D9.

- 4.16 The Council will seek to strengthen existing housing design policy requirements to ensure the delivery of high-quality, inclusive, healthy, and sustainable new homes. All new residential development proposals will be required to demonstrate compliance with the London Plan 2021 policy D6 housing quality standards, alongside additional best practice qualitative requirements specific to Bromley. The Council is keen to ensure that residential extensions and alterations to existing buildings are of a high quality design that respects and complements local character, and will therefore seek to include robust design requirements in the new Local Plan.
- 4.17 The character and appearance of Bromley's Town, District and Neighbourhood Centres, including their shopfronts, contribute significantly to the distinctive character and identity of the borough. The Council will seek to ensure that new shopfronts and advertisements are of a high quality design and are sensitive to the area in which they are located with policy requirements that align with existing guidance provided in the Bromley Urban Design Guide SPD.

Summary of the Council's preferred policy direction for design and heritage

1. Introduce the Council's six overarching design principles (outlined in the Bromley Urban Design Guide SPD) that are considered essential components in delivering good design and which represent the key characteristics of successful well-designed places.
2. Prioritise the delivery of high quality design that responds positively to Bromley's local distinctiveness with buildings and spaces that reinforce and enhance local character.
3. Continue to protect the historic environment by conserving and enhancing the value and significance of Bromley's heritage assets and their settings.
4. Strengthen policy requirements for tall building proposals to ensure that tall buildings are appropriately located and well-designed.
5. Continue to ensure that designated views of local importance are protected and enhanced.
6. Strengthen housing design policy requirements to ensure the delivery of high quality, inclusive, healthy, and sustainable new homes that respect and complement local character.
7. Introduce new requirements relating to residential extensions and alterations to existing buildings and structures to ensure high quality design that respects and complements local character.
8. Continue to protect the character and appearance of Bromley's Town, District and Neighbourhood Centres, ensuring that new shopfronts and advertisements are of a high quality design and are sensitive to their location.

Consultation questions – Design and Heritage

1. Do you have any comments on the Council's design and heritage evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the design and heritage policies in the new Local Plan?

3. Do you have any comments on the Council's preferred policy direction for design and heritage?
4. Is there an alternative policy direction that you consider the Council should follow in relation to design and heritage? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan design and heritage policies?

5. Employment

- 5.1 Bromley has a strong local economy; the borough's proximity to Central London, and to the M25 by road, means that industry is well-located to connect to London markets and across the wider South East; and also means that the borough is well-placed to capture the increase in last mile logistics and distribution activity nationally. In terms of offices, Bromley's connectivity to Central London has enabled the development of a strong financial and professional services base across the borough.
- 5.2 The Bromley Corporate Strategy sets out an ambition for business and enterprise to prosper, to be achieved by maintaining a strong focus on encouraging and enabling further economic growth and regeneration in Bromley, prioritising town centres as great places for business, enterprise, and social enterprise to prosper. The Bromley Growth Plan aims to establish Bromley as a beacon of sustainable prosperity, where businesses, communities, and residents collectively shape a dynamic, innovative, and inclusive economy that prioritises resilience, connectivity, and shared opportunities for growth.

What is our current policy approach?

- 5.3 Chapter 6 of the Local Plan – Working in Bromley – sets out the planning policies to deliver forecast significant employment growth and the business and Town Centre objectives.
- Policy 80 identifies three strategic priority areas for economic growth; Bromley Town Centre, the Cray Business Corridor, and Biggin Hill SOLDC.
 - Policy 81 concerns the Strategic Industrial Locations (SILs) within the Cray Business Corridor. The Corridor represents just under 40% of all designated industrial/employment land in the Borough and includes St Mary Cray, the largest industrial/employment area in the Borough. The policy seeks to safeguard existing industrial/employment uses and encourages new industrial/employment floorspace.
 - Policy 82 covers Locally Significant Industrial Sites (LSISs), which provide a wide range of premises for industrial/employment uses across the Borough. New industrial/employment uses are prioritised in LSISs, and loss of such uses must be robustly justified, including a requirement for active marketing.
 - Policy 83 seeks improvements to the quality and quantity of employment floorspace on non-designated sites containing existing industrial and related employment uses. Proposals involving the change of use from employment floorspace to a non-employment generating use must address specific criteria.
 - Policy 84 identifies three Business Improvement Areas (BIAs) in Bromley Town Centre, where the Council will seek to manage and improve the supply of high quality office floorspace. Policy 85 identifies three office clusters elsewhere in the Borough, within which the Council seeks to retain and manage an adequate stock of good quality office floorspace.
 - Policies 103 to 110 relate to the Biggin Hill Strategic Outer London Development Centre (SOLDC). The policies provide a strategic framework for economic growth at Biggin Hill Airport and the adjoining Biggin Hill LSIS, with a primary focus on aviation-related activities and associated business infrastructure and amenities. The policies also aim to minimise adverse impacts on the environment and the amenity of surrounding communities.

What feedback have we received so far?

- 5.4 The main issues raised during the Issues and Options consultation relating to the Local Plan employment chapter were as follows:
- Respondents considered that existing strategic policy areas should be protected; and that other areas with good growth potential should also be considered as a focus for economic growth.
 - There were mixed views regarding the growth of Biggin Hill. Some respondents considered that it can play a key role in the economic growth of the borough, and therefore development at the airport should be promoted via green belt release; however, a number of respondents raised concerns regarding amenity and environmental impacts.
 - Some respondents stated that there should be flexibility in the policies for industrial and commercial sites that are no longer in use, to allow the consideration of other uses and ensure that land is used efficiently.
 - It was noted that employment sites should provide high quality modern floorspace, as outdated floorspace can constrain growth. Strong energy efficiency credentials were considered important.
 - Responses suggested that Bromley should plan for a wide range of employment uses; in particular, office, retail, affordable and flexible workspace, flexible working and working from home were seen as key areas to plan for.
 - A number of responses raised issues that needed to be addressed to support economic growth, including building skills and promote apprenticeships; addressing issues with rents and business rates; providing sufficient parking with EV charging points at places of work; and improving access to sustainable transport modes.
 - Some responses identified the need to invest in the public realm, in both industrial areas and town centres.

Evidence base

- 5.5 The following evidence base documents are being prepared to inform the new Local Plan employment policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 4: Bromley's employment evidence

Evidence base document	Status
Bromley Employment Land and Space Study 2024	Complete, to be published alongside Regulation 18 draft (Summer 2025).
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Green Belt, Metropolitan Open Land and focused Urban Open Space study	In progress, intention to publish with Regulation 19 draft (Summer 2026).

- 5.6 The Employment Land and Space Study (ELSS) provides an up-to-date assessment of future employment floorspace and land needed to accommodate economic growth in Bromley based on industry-accepted economic projections. The ELSS identifies a net floorspace requirement of approximately 33,000sqm to 63,000sqm of employment floorspace across Use Classes E(g) and B2, broken down as follows:
- Approximately 23,000sqm to 37,000sqm of Use Class E(g)(i) and E(g)(ii) floorspace.

- Approximately 10,000sqm to 26,000sqm of Use Class B2 and E(g)(iii) floorspace.
- No net requirement for additional Use Class B8 floorspace.

- 5.7 The ELSS identifies the potential for new and expanded industrial designations in Green Belt locations. While the study sets out the economic justification for these new and expanded designations, any release of Green Belt would be informed by the Council's ongoing Green Belt review. The ELSS also identifies significant potential for the intensification of industrial uses (E(g)(iii), B2, B8) in designated areas, to support increased economic growth in the borough. However, the ESS recognises that achieving intensification and re-development at scale will be challenging and require policy to support and promote intensification on sites that present opportunities.
- 5.8 For office uses, the ELSS recommends that Bromley Town Centre is identified as the boroughs preferred office area, as it is the most appropriate, attractive and 'suitable' office location in the borough. The focus for this area should be improving the quality of office floorspace, rather than simply increasing quantum. Although the ELSS identifies a need for new office floorspace, it is not recommended that the Council plan for a significant amount of additional office floorspace due to uncertainty around patterns of demand, for example changing demand dynamics for office space due to increases in hybrid working, and also because of challenges with office occupancy across the borough.
- 5.9 The ELSS includes commentary on affordable workspace, noting that a truly effective approach to affordable workspace delivery should consider various factors affecting affordability of space, to ensure that a range of spaces are available and affordable to target businesses. This does not mean that discounts to market rent should be excluded, but rather considered as part of a wider definition of affordability.
- 5.10 The Infrastructure Delivery Plan (IDP) includes a section related to economic infrastructure, which is a new addition compared to previous IDPs published by the Council. This evidence links to other Council work including the Bromley Growth Plan, setting out any associated infrastructure requirements that result from this work. The IDP will be used to underpin relevant emerging policy including policy on employment and skills.
- 5.11 The Local Plan Viability Study will assess the ability to deliver proposed employment policy objectives. The study will analyse the current and future market ability to deliver emerging policy requirements. All financial and non-financial requirements which the Council places upon developers will be tested.

What is the Council's preferred policy direction?

- 5.12 The Council will strive to meet the employment projections set out in the ELSS through a positive policy approach which looks to intensify office and industrial uses in designated areas, providing high quality floorspace that will be fit for purpose for a range of occupiers.
- 5.13 SILs and LSISs will continue to be the focus for new and intensified industrial floorspace. The ELSS identifies potential for designating the current Lower Sydenham LSIS as a SIL; and an expansion of the Crayfields Industrial Park SIL to incorporate the adjacent Crayfields Business Park, the Homebase site and some adjacent Green Belt land. The Council will explore the potential for these new and expanded designations, which will include consideration of the Green Belt land at Crayfields as part of the Green Belt review.
- 5.14 The ELSS recommends the designation of eight new LSISs across the borough, most of which fall within the Green Belt. While the designation of new LSISs will assist with the aim of protecting and promoting new industrial floorspace, any new designation on land that is

currently designated Green Belt will require exceptional circumstances to be demonstrated; this will be considered as part of the Green Belt review.

- 5.15 Office uses will continue to be prioritised in town centre locations. The ELSS considers Bromley Town Centre is the boroughs key strategic office location, therefore office uses should be focused here, in particular by continuing and strengthening the current BIA designations. The Council considers that the office cluster designation from the adopted Local Plan is no longer necessary, as these areas will either be covered by other employment designations or can be protected through other policies.
- 5.16 The ELSS identifies a need for new office floorspace but does not recommend identifying sites to meet this in full. The Council will seek to identify office provision on relevant site allocations as well as promoting new offices in town centres – this approach would give flexibility to ensure that a consistent supply of new office floorspace can come forward to contribute to meeting the ELSS need figure. The Council will monitor the supply/demand balance throughout the lifetime of the new plan.
- 5.17 Non-designated employment areas will continue to contribute towards economic growth, and employment floorspace in these locations will continue to be protected. The Council will seek to focus new floorspace in designated areas, in line with the sequential approach, but there may be scope to allow smaller-scale employment proposal in non-designated areas.
- 5.18 Resisting the loss of existing floorspace is an important aspect for employment policies. The Council will explore the introduction of detailed policy criteria to prevent the loss of employment floorspace. This could include strengthened marketing requirements, with the length of marketing tailored to respective designations; for example, loss of industrial floorspace in a SIL will require a longer period of marketing than loss of industrial floorspace in a non-designated location.
- 5.19 The Council is keen to ensure that new employment floorspace is of a high quality and will seek to include robust design requirements in the new Local Plan.
- 5.20 Biggin Hill Airport will continue to be a strategically important employment location. The Council intends to remove the current SOLDC designation given that the London Plan 2021 does not continue the specific SOLDC designation for Biggin Hill. However, the Council will explore a specific policy for the airport, continuing the broad thrust of the current Local Plan policies 103 to 108.
- 5.21 The ELSS considers the need for affordable workspace in Bromley, and highlights that there are a variety of important factors to consider when establishing affordability of employment space, not just the level of rent. The Council will aim to ensure that the new Local Plan reflects these considerations and ensure there is robust policy to secure appropriate affordable workspace, and a range of different employment typologies based on the needs of the businesses in the borough.
- 5.22 Measures to help facilitate employment and skills programmes and opportunities will also be investigated, linked to the Bromley Growth Plan.

Summary of the Council's preferred policy direction for employment
1. Prioritise SIL and LSIS as the key locations for industrial floorspace.
2. Investigate new SIL and LSIS designations in line with the recommendations of the ELSS.

3. Prioritise Bromley Town Centre BIAs and other town centre locations as the key locations for office floorspace.
4. Remove the office cluster designation.
5. Continue to protect employment floorspace in non-designated locations, including through the provision of strengthened marketing criteria.
6. Remove the Biggin Hill SOLDC designation but identify Biggin Hill Airport as a strategic employment location, with the continuation of the current Local Plan policies relating to the airport.
7. Strengthen policy on the quality of new employment floorspace.
8. Introduce new requirements relating to affordable workspace, consideration of different employment typologies, and measures to help facilitate employment and skills programmes and opportunities.

Consultation questions - Employment

1. Do you have any comments on the Council's employment evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the employment policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for employment?
4. Is there an alternative policy direction that you consider the Council should follow in relation to employment? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan employment policies?

6. Retail and Leisure

- 6.1 Bromley has a well-established network of designated centres which is recognised in the London Plan. The network of town centres and local centres is central to the quality of life and well-being of Bromley's communities providing a wide range of services and facilities.
- 6.2 In planning for good, inclusive growth, it is necessary to ensure that there is a good choice and range of town centre uses at the most appropriate locations for existing and future residents.

What is our current policy approach?

- 6.3 The retail and leisure policies set out in Chapter 6 of the Local Plan aim to help maintain and enhance the roles of different centres and ensure that Bromley's town centres continue to grow and develop in a way that supports and strengthens the town centre network hierarchy for the borough.
- Policy 91 requires main town centre uses to be located within town centres. All proposals for main town centre uses outside of existing centres are required to meet the sequential test; larger proposals for main town centre uses (over 2,500sqm) outside of existing centres are required to provide an impact assessment.
 - The Local Plan sets out a hierarchy of town centres, reflecting the London Plan town centre network classifications.
 - Bromley Town Centre is identified as a metropolitan town centre and is the Borough's largest town centre. It is also identified as an Opportunity Area (Local Plan Policy 90) with an indicative capacity of 2,500 homes and 2,000 new jobs in the town centre. Policy 93 prioritises retail uses in the Glades Shopping Centre in order to ensure that the centre's primary retail function is not adversely affected.
 - Orpington Town Centre is a major town centre and the second largest retail centre in the Borough.
 - Beckenham, Crystal Place, Penge, Petts Wood and West Wickham are identified as district centres, which generally provide convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling.
 - Biggin Hill, Chislehurst, Hayes, Locksbottom and Mottingham are identified as Local centres. These are a Bromley-specific designation which provide a range of shops and services to meet the needs of local communities.
 - Policy 96 identifies a number of neighbourhood centres, local parades and individual shops. The main function of these local shops is to provide for the day to day needs of local residents, especially those who are less mobile and unable to reach larger centres.
 - The Local Plan designates primary and secondary frontages within metropolitan, major and district town centres. These frontages are the main focus for retailing activities within the respective Town Centres. New restaurant, café, drinking establishment and hot food takeaways are supported where certain criteria is met, including amenity considerations.
 - Residential uses are supported on upper floors in town centres where the proposed accommodation can address criteria relating to amenity, living conditions and compatibility with adjacent/adjoining uses. Residential uses at ground floor level may be acceptable outside town centre frontages, where various requirements are met including demonstrating that the retail vitality and viability of the centre will not be undermined.

- Policy 88 supports hotels within town centres and on the edge of the two largest town centres, where there are no unacceptable impacts on local amenity.
- The role of existing and new markets is promoted in Policy 100.
- Policy 23 concerns Public Houses, which have a dual commercial and community role. The policy resists the loss of Public Houses unless specific criteria is met, including the need to ensure continued accessible Public House provision in the local area; and a requirement to demonstrate that the Public House is no longer financially viable (which should include submission of active marketing evidence for a substantial period of time).

6.4 The Council has also adopted SPDs for Bromley Town Centre and Orpington Town Centre, to provide detailed guidance to assist with the implementation of adopted Development Plan policies that relate to these areas.

What feedback have we received so far?

- 6.5 The main issues raised during the Issues and Options consultation relating to the Local Plan retail and leisure chapter were as follows:
- Respondents suggested that existing town centres need to be more attractive, safe, accessible and pedestrian friendly, and include tree planting and green spaces. Air pollution was raised as an issue in town centres.
 - It was noted that town centres need activities for people of all ages, and that leisure uses, and community focussed activities should be supported.
 - There was support for small independent shops and larger retailers, and for diversifying town centres subject to appropriate controls being in place.
 - There was support for residential uses in town centres subject to appropriate infrastructure being in place to support it; however, concerns were also raised regarding the compatibility with other uses.
 - Respondents considered that public houses should be protected as these are a significant source of employment.
 - Respondents raised concerns over the number of fast food shops.
 - High quality design of new development in town centres was considered to be important, with some respondents suggesting that high-rise development be resisted. Respondents also noted that historic buildings should be protected.

Evidence base

- 6.6 The following evidence base documents are being prepared to inform the new Local Plan retail and leisure policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 5: Bromley's retail and leisure evidence

Evidence base document	Status
Bromley Retail and Leisure Study	Complete, to be published alongside Regulation 18 draft (Summer 2025).
Bromley Employment Land and Space Study 2024	Complete, to be published alongside Regulation 18 draft (Summer 2025).
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).

- 6.7 The Bromley Retail and Leisure Study will identify the retail and town centre needs of the borough including an assessment of quantitative floorspace need. The study will also make recommendations on the proposed hierarchy of town centres, the local impact assessment threshold, town centre boundaries and primary shopping areas (PSAs) on a centre by centre basis.
- 6.8 As noted in section 5, the ELSS recommends that Bromley Town Centre is identified as the boroughs preferred office area, as it is the most appropriate, attractive and 'suitable' office location in the borough.
- 6.9 The Infrastructure Delivery Plan (IDP) includes a section related to economic infrastructure, which is a new addition compared to previous IDPs published by the Council. This evidence links to other Council work including the Bromley Growth Plan, setting out any associated infrastructure requirements that result from this work. The IDP also includes information on public realm which links to certain town centre locations.
- 6.10 The Local Plan Viability Study will assess the ability to deliver proposed employment policy objectives. The study will analyse the current and future market ability to deliver emerging policy requirements. All financial and non-financial requirements which the Council places upon developers will be tested.

What is the Council's preferred policy direction?

- 6.11 The Council will aim to meet the retail floorspace projections set out in the retail and leisure study.
- 6.12 PSAs within each of the town centres will be defined, to reflect the current approach set out in the NPPF. The PSAs will be the focus for retail uses and the loss of retail floorspace in PSAs will be resisted.
- 6.13 To promote a town centre first approach and ensure that main town centre uses are prioritised in town centre locations, the Council will require applications for retail or other town centre uses on the edge of, or outside of, defined town centres in the borough to demonstrate that there are no sequentially preferable sites available. The Council will also seek to introduce a bespoke impact assessment threshold (informed by the retail and leisure study) to ensure that no 'significant adverse' impacts will arise on existing defined centres as a result of out of centre applications.
- 6.14 Use Class E (Commercial, Business and Service) has allowed for a greater range of movement between different town centre uses without the need for planning permission. As part of preparing the Local Plan, the Council will consider the scope for protecting specific Use Class E uses in certain parts of town centres, for example, through the use of planning conditions. The Council will seek to resist the loss of class E floorspace to non-commercial uses in town centre locations where possible, particularly in any identified PSAs. This could include strengthened marketing requirements, with the length of marketing tailored to respective designations; for example, loss of Class E floorspace in PSAs will require a longer period of marketing than loss of Class E floorspace outside PSAs.
- 6.15 Restaurants, cafés, pubs and hot food takeaways all make an important contribution to creating a vibrant town centre and shopping area, they can however create negative impacts if not carefully managed. Concentrations of such uses become over concentrations where and when there are unacceptable negative impacts relating to the level of concentration in a given area, including impacts on the vitality and viability of the centre, traffic, noise, fumes, and

health. The Council will explore policies to control these uses and avoid overconcentration which may be harmful to local amenity.

- 6.16 The Council will maintain a policy to protect public houses because of their important social and economic value. The Council will also continue a policy to support hotels and other visitor accommodation in town centre locations.
- 6.17 The current approach to markets in the adopted Local Plan will be maintained, to support their ongoing operation and encourage the creation of new markets where appropriate. The Council will also explore a policy to promote meanwhile/temporary uses in vacant Class E town centre units, to assist with improving vitality and viability of these areas.

Summary of the Council's preferred policy direction for retail and leisure

1. Require main town centre uses to be located within designated town centres and other protected neighbourhood centres and parades, in accordance with the retail hierarchy.
2. Resist the loss of existing retail floorspace across the retail hierarchy in a proportionate manner, including through the provision of strengthened marketing criteria.
3. Require development proposals for main town centre uses outside of designated town centres and other protected neighbourhood centres and parades to meet the sequential test as set out in the NPPF.
4. Introduce a bespoke impact assessment threshold for development proposals for main town centre uses, to ensure that the extent of any impacts on relevant town centres and/or other protected neighbourhood centres and parades are identified.
5. Introduce policy criteria for the temporary/meanwhile use of vacant Class E floorspace in town centres.
6. Introduce policy criteria to limit impacts of potentially harmful uses, particular where such uses are overconcentrated.
7. Ensure the continued protection and promotion of markets.
8. Maintain a policy to protect public houses.
9. Continue a policy to support new visitor accommodation in town centre locations.

Consultation questions – Retail and Leisure

1. Do you have any comments on the Council's retail and leisure evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the retail and leisure policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for retail and leisure?
4. Is there an alternative policy direction that you consider the Council should follow in relation to retail and leisure? Please provide justification to support any suggested alternative policy direction.

5. Do you have any other comments that are relevant to the preparation of the new Local Plan retail and leisure policies?

7. Sustainability and Waste

- 7.1 Tackling climate change by reducing carbon emissions and adapting to the challenges it presents is an international and national, with higher level planning policy set in the NPPF and the London Plan. Bromley can contribute to these goals by requiring sustainable design and construction in new development, enabling more sustainable transport choices and retaining and enhancing its valued green spaces with their multiple benefits. Improving the resilience of the borough to the impacts of climate change including the risk of flooding, heat and extreme weather events is important to protect residents, businesses and the local environment.
- 7.2 The sustainable design and construction of new buildings and the refurbishment of existing buildings can help improve their environmental performance and comfort for occupiers. High standards of energy efficiency combined with low-carbon heating and power supplies, including renewable energy generation, can reduce their environmental impact and reduce energy costs for occupants.
- 7.3 The reduction of waste, its reuse and recycling is a national and regional aim, underpinned by principles of the circular economy (treating waste a resource, making the best use of it as far as possible and minimising its disposal). While some waste can be managed within the borough, collaboration with neighbouring local authorities provides opportunities to make use of cross-boundary links including sharing waste processing facilities.

What is our current policy approach?

- 7.4 The adopted Local Plan sets out local planning policy on a range of environmental issues.
- Policy 67 relates to minerals workings and associated development, setting out clear requirements that all proposals for mineral extraction will be required to meet and plans for remediation.
 - Policies 112 to 114 set out the Council's approach to planning for waste management. This includes a commitment to meet waste apportionment targets set in the London Plan in collaboration with a group of south-east London boroughs and The City of London; the safeguarding of three strategic waste management sites; and expectations for the location of any new waste facilities or extensions.
 - Policies 115 and 116 aim to reduce flood risk, including through the application of the sequential and exception tests to avoid inappropriate development. All development proposals should reduce surface water run-off entering the sewerage network and in the wider environment, using Sustainable Urban Drainage Systems (SUDS) as far as possible.
 - Policy 117 recognises the need to manage and improve the water and waste water infrastructure capacity of the Borough by ensuring that new development reduces the burden on the existing system and increases capacity.
 - Policy 118 requires investigation of known or possible contaminated land on development sites and the submission of plans for high standard remediation to avoid any future risk.
 - Policy 119 explains how the potential adverse impacts of noise, from the new development itself and from the surrounding environment, should be considered in the location, design and layout of development.

- Policy 120 addresses air quality. If new development could have a detrimental impact on air quality, or it may be located in an area which will expose future occupiers to poor air quality, it may require an Air Quality Assessment.
- Policy 121 requires adequate ventilation and odour control to be presented with proposals for eating and drinking establishments.
- Policy 122 aims to balance the need for lighting in new development with the respect for nearby residential amenity, road safety and other sensitive receptors.
- Policy 123 sets out the basic principles of sustainable design and construction that should be used in all developments.

What feedback have we received so far?

7.5 The main issues raised during the Issues and Options consultation relating to the Local Plan sustainability and waste chapter were as follows:

- Tackling climate change was identified by respondents as an important issue.
- Respondents considered that local character, heritage and the viability of new development should be considered in policies to mitigate and adapt to climate change.
- It was considered that links should be made to the benefits of protecting and enhancing green infrastructure and the encouragement of sustainable transport including public transport, walking and cycling.
- Some respondents suggested a stronger requirement for EV charging points.
- It was noted that new development could help reduce carbon emissions as poorly performing buildings are replaced; but conversely, other respondents noted that the renovation, refurbishment and reuse of existing buildings could help reduce waste and support the circular economy.
- Some respondents suggested that renewable energy generation infrastructure such as solar panels should be incorporated in new development.
- High standards of sustainable design and construction were recognised as important, but respondents noted that there are already national and regional requirements that apply.
- It was suggested that information about potential flood risk should be updated to inform local policy, site allocations and decisions on planning applications.
- Comments were received relating to the location of existing waste sites, particularly relating to pollution and traffic disruption caused to neighbours.
- Respondents noted that the evidence base for the borough's waste management obligations under the London Plan should be updated.
- Some responses noted that air quality is not observed to be a significant problem in Bromley, while others suggested that further measures should be implemented to improve air quality.
- Respondents notes that areas of aggregate deposits should be protected.

Evidence base

7.6 The following evidence base documents are being prepared to inform the new Local Plan sustainability and waste policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 6: Bromley's Sustainability and Waste evidence

Evidence base document	Status
Bromley Strategic Flood Risk Assessment	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Waste Technical Paper	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).

- 7.7 A Strategic Flood Risk Assessment (SFRA) is being prepared to support the development of the new Local Plan, updating the previous SFRA which was prepared to inform the adopted Local Plan.
- 7.8 Bromley is part of a long-standing group of south-east London boroughs, along with the City of London, which collaborate to manage their waste apportionment targets. The group produces a 'Technical Paper' setting out the sites in their area which they allocate including their licenced uses and capacity. The technical paper is a 'live document' and will be updated to accompany the next stage of Bromley's Local Plan.
- 7.9 The Infrastructure Delivery Plan (IDP) includes a section related to environmental infrastructure, which will support policies that seek to deliver carbon reduction and mitigate flood risk impacts. The Local Plan Viability Study will assess the ability to deliver proposed sustainability and waste policy objectives.

What is the Council's preferred policy direction?

- 7.10 The Local Plan will aim to reduce the environmental impact and carbon emissions of new development in Bromley, in accordance with the NPPF and the London Plan. It will help to increase the resilience of the borough to the potential impacts of climate change by including policies to retain and enhance green infrastructure, reduce and manage flood risk and prevent overheating in new development.
- 7.11 The new Local Plan will continue to require major developments in Bromley to be net 'zero carbon', reflecting the policy in the London Plan. Reduction of carbon emissions will be prioritised on-site, with an ability to provide reductions off-site or through a cash in lieu contribution to the Council's carbon off-setting fund in certain circumstances.
- 7.12 Sustainable design and construction policy will support the energy hierarchy, reducing energy demand through design in the first instance, before investigating low-carbon supplies and including on-site renewable energy. The Council will investigate the potential for a policy which seeks the achievement of a BRE AAM level certification (an independently verified sustainable construction standard), to demonstrate that a holistic approach to the design and construction of a project has been undertaken, covering materials, carbon, energy and water use.
- 7.13 The retrofitting of existing buildings will be encouraged where feasible, as this could support other policy objectives to reduce waste and improve energy performance.
- 7.14 The new Local Plan will support the inclusion of renewable infrastructure as part of new development, including solar panels and heat pumps as part of smaller-scale development proposals; however, the new plan will also allow for consideration of any potential impacts that may arise, for example, impacts on character and heritage. Options such as solar tiles could

be promoted as possible alternatives to ensure that the development of new infrastructure respects local character.

- 7.15 There may be opportunities for larger-scale energy infrastructure and supporting infrastructure within the borough, but the location and benefits of this development would need to be justified and balanced with the need for other uses (e.g. housing and commercial) and other policy objectives including the protection of open space, designations such as Green Belt, biodiversity and any impacts on neighbouring businesses or residential amenity.
- 7.16 Air quality in the borough is on average better than many other London boroughs but there is a wide variation across the borough. An Air Quality Management Area has been declared based on monitored pollutants which exceed statutory levels of NO₂ (Nitrogen dioxide). The Council has published an Air Quality Action Plan (AQAP) which sets out actions to improve air quality, particularly in the Air Quality Focus Areas in Bromley Town Centre and Elmers End. Planning policies in the new Local Plan will require all development proposals to be air quality neutral; and require an air quality assessment for certain proposals including those in areas of existing poor air quality.
- 7.17 The new Local Plan will follow the principles of the waste hierarchy, meaning that development proposals should address how waste can be minimised in construction, use and reuse, supporting the circular economy. The London Plan 2021 sets targets to manage waste within Greater London. Each borough is apportioned an amount of waste to manage but they can collaborate with other boroughs to meet that target. Bromley has some waste management sites, including the Council's reuse and recycling centres, but there is not sufficient capacity within the borough to manage all the waste produced by households and businesses. The Council is part of the South East London Waste Group which enables the apportionment targets to be met across the member boroughs. As part of Bromley's contribution to the South East London Waste Group and the management of the London Plan apportionment targets, Bromley's Local Plan will allocate and safeguard three strategic waste management sites – the Council's Waldo Road Depot Bickley, Churchfields Road, Beckenham and the green waste site on Cookham Road, St Mary Cray.
- 7.18 Proposals for changes or extensions to existing waste management sites will continue to be determined in accordance with the National Planning Policy for Waste (2014) and other relevant policies, to ensure that any impacts on local amenity, including impacts from transport, odour and noise, are fully addressed.
- 7.19 To reduce existing flood risk and the impact of new development, the new Local Plan will require the sequential and exception tests to be applied to development proposals in flood risk areas, in accordance with national policy and technical guidance, to ensure that every effort has been made to steer proposals to areas with the lowest flood risk, and that ongoing flood risk impacts are fully mitigated where development in higher risk areas is acceptable. The new plan will also require Flood Risk Assessments to be submitted for certain types of application, including all planning applications in flood zones 2 and 3, and surface water.
- 7.20 Surface water flooding is in part, the result of natural soil and ground conditions, but increased by the use of more impermeable (hard, non-porous) surfaces and can create flooding in sometimes unexpected areas. High rainfall incidents can put pressure on drainage systems and wastewater infrastructure. Retaining natural permeable surfaces, particularly in urban areas, gardens and parks, could help to slow water flow; and including SUDS (sustainable urban drainage systems) in most developments could help to attenuate water and allow it to dissipate more slowly by holding water or channelling it away. Planning policies in the new Local Plan could help encourage the retention of natural permeable surfaces and the incorporation of SUDS.

- 7.21 London Plan 2021 policy SI10 sets out a strategy to increase the re-use and recycling of construction demolition and excavation waste, but also to ensure an adequate supply of aggregates to support construction in London. Although Bromley does not have an obligation to supply minerals and aggregates, it is noted to have an existing quarry site and potential deposits of Thanet sand which are important for the construction industry. The new Local Plan will continue the approach taken in the current adopted Local Plan policy 67 by setting criteria to assess any planning applications for mineral extraction.
- 7.22 The new Local Plan will continue to require high quality information to be submitted with proposals on land which is known to be or is suspected of being contaminated, and secure the remediation of contaminated land to enable appropriate reuse.
- 7.23 The new Local Plan will require proposals for development in proximity to an existing use(s) which may be adversely impacted to follow the agent-of-change principle. Any potential adverse impacts which could arise should be prevented by the design/layout of a scheme and/or the incorporation of other appropriate measures to limit the impact. Impacts will vary but may include those resulting from vibration, noise (including airborne noise) and/or the operation of a use (such as regular ingress/egress routes and plant noise, or waste disposal), which could cause amenity impacts on a proposed use. The Local Plan will also include policy to minimise impacts from light pollution.

Summary of the Council's preferred policy direction for Sustainability and Waste

1. Incorporate sustainable design and construction principles, including a requirement to attain BREEAM standards.
2. Follow the energy hierarchy by reducing the need for energy in new development through high efficiency standards, requiring low carbon energy and heating and on-site renewable energy generation.
3. Support stand-alone renewable energy generating infrastructure where other policy objectives can be met, and negative impacts mitigated.
4. Reduce the impact of new development on air quality, particularly in areas of the borough where the levels of pollutants are high.
5. Ensure that development proposals follow the waste hierarchy, from design to use, reuse, demolition and final disposal (where unavoidable).
6. Safeguard strategic waste management sites to assist with meeting the waste apportionment targets in the London Plan.
7. Set out criteria to assess any planning applications for mineral extraction.
8. Promote the use Sustainable Urban Drainage Systems (SUDS), seek retention of existing permeable surfaces and ensure that new development is focused in areas with the lowest flood risk unless justified, including through provision of a detailed flood risk assessment.
9. Set out a requirement for development proposals to fully assess potentially contaminated land and secure the remediation of contaminated land to enable appropriate reuse.
10. Require new development to follow the Agent of Change principle to address the potential for adverse amenity impacts.

Consultation questions – Sustainability and Waste

1. Do you have any comments on the Council's sustainability and waste evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the sustainability and waste policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for sustainability and waste?
4. Is there an alternative policy direction that you consider the Council should follow in relation to sustainability and waste? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan sustainability and waste policies?

8. Green Infrastructure, Open Space and Biodiversity

- 8.1 The NPPF sets out the Green Belt's fundamental aim, to prevent urban sprawl by keeping land permanently open. The NPPF sets out five purposes that Green Belt land serves. It is for local planning authorities (LPAs) to define and maintain Green Belt land in their local areas.
- 8.2 The NPPF requires local planning authorities to set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Policies should set out criteria against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.
- 8.3 Green Infrastructure (GI) includes the 'green' and 'blue' features of Bromley that can provide environmental benefits and contribute to quality of life. Over half the borough is open countryside, much of which is Metropolitan Green Belt land. Bromley also has a significant number of open spaces, parks and recreation grounds. The Bromley Corporate Strategy aims to protect and enhance green belt land in Bromley, and work in partnership with key stakeholders to manage and enhance parks and green spaces in the borough.

What is our current policy approach?

- 8.4 Chapter 5 of the adopted Local Plan sets out a series of policies relating to green infrastructure, open space and biodiversity.
- Policies 49 to 53 concern the Green Belt and Metropolitan Open Land (MOL) and adjoining land. These areas are incredibly important as they prevent urban sprawl by maintaining the openness of land. Green Belt and MOL often has a multi-functional role, including green infrastructure and biodiversity benefits.
 - Inappropriate development in these areas is resisted unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm. Some exceptions apply, including extensions or alterations of a building that do not result in disproportionate additions over and above the size of the original building. Policy 51 sets out a threshold for what constitutes a 'disproportionate addition'.
 - Policy 55 identifies Urban Open Space (UOS), locally important open spaces to the local communities within the built-up area. The policy sets out specific circumstances where development will be acceptable on UOS.
 - Policy 56 sets out 25 Local Green Spaces (LGSs) across the borough; these are green or open spaces which has been demonstrated to have special qualities and hold particular significance to the local community which they serve. Development which causes harm to the "special qualities" of a LGS, as defined within its Statement of Significance set out in Appendix 10.8, but is otherwise policy compliant will be considered inappropriate and will not be accepted except in very special circumstances.
 - Provision of outdoor sport and recreation facilities is supported where specific criteria is addressed, including specific criteria relating to Green Belt and MOL. Loss of sports,

recreation and playing fields is resisted unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements.

- Policy 59 concerns public open space deficiency, whereby people do not have access to public open spaces of a particular standard. Areas of deficiency are mapped on the Policies Map. The policy states that the Council will seek, where opportunities arise and finance permits, to secure improvements in the amount and distribution of, and access to, open space in areas of deficiency identified by the Council.
- Policies 61 to 66 concern agricultural and farming uses, including agricultural dwellings.
- Policy 67 relates to minerals workings and associated development. Mineral extraction is an activity that causes considerable disruption and can have widespread effects on local residential and visual amenity, landscapes, nature conservation interests, existing uses, transport networks, and safety. The policy sets out clear requirements that all proposal for mineral extraction will be required to meet.
- Policies 68 to 79 set out detailed requirements in relation to biodiversity and nature conservation. Policies 68 and 69 identify various different statutory and non-statutory classifications of nature conservation site:
- Sites of Special Scientific Interest (SSSI) - a statutory designation determined by Natural England as being of national importance by reason of any of their flora, fauna, geology, or physiological features.
- Local Nature Reserves (LNRs) - a statutory designation for areas with wildlife or geological features that are of special interest locally. Some LNRs are suitable for recreational purposes where they are managed appropriately.
- Sites of Importance for Nature Conservation (SINCs) – sites identified through the Local Plan, identified as being of Metropolitan, Borough or Local importance for nature conservation purposes. All SSSI sites of biodiversity interest are included within sites of Metropolitan SINCs.
- Regionally Important Geological Site (RIG) – RIGs are the most important non-statutory designated sites for geology and geomorphology and represent an important educational, historical and recreational resource; they are the geological equivalent to Metropolitan SINCs.
- There are strong policy protections in place to prevent adverse impacts on these sites, and to ensure that appropriate mitigation measures are put in place where a potentially harmful development proposal can demonstrate overriding benefits.
- Policy 72 ensures that planning permission will not be granted for development or change of use of land that will have an adverse effect on protected plant and animal species (including badgers, bats, dormice, great crested newts and some species of birds), unless suitable mitigation measures can be secured.
- Policies 73 and 74 concern trees. Trees are important features of the Borough's environment and are a valuable resource for wildlife and are strongly protected, with an emphasis on retention and protection of trees as part of any development proposal. The policy seeks suitable replanting in circumstances where trees have to be felled. Policy 75 covers hedgerows, setting out the important role that they play in softening and screening new developments, in defining boundaries and in protecting the privacy of adjoining properties.
- A small portion of the Kent Downs Area of Outstanding Natural Beauty (AONB) lies within Bromley. The AONB is a designation of national importance which recognises the area's unique landscape quality in order to preserve and enhance its characteristic natural features, including flora and fauna, and to maintain its beauty. Policy 76 of the Local Plan seeks to protect, conserve and enhance the AONB and its setting, from development considered to have a detrimental impact on the landscape of the area.
- Policy 77 concerns landscape quality and character across the rest of the borough. Bromley has extensive areas of open land in the Borough which have considerable landscape value, principally within the Green Belt but also in some areas of MOL.

Development proposals should safeguard the quality and character of the local landscape and seek the appropriate restoration and enhancement of the local landscape.

- Policy 79 relates to biodiversity and access to nature and seeks opportunities to improve access to wildlife sites in areas which are currently deficient in access. The Policies Map identifies these deficiency areas, which cover areas more than 1km walking distance from Metropolitan and Borough-grade SINCs.

What feedback have we received so far?

8.5 The main issues raised during the Issues and Options consultation relating to the Local Plan green infrastructure, open space and biodiversity chapter were as follows:

- A number of respondents stated that Bromley's Green Belt and Metropolitan Open Land remain vital assets and any proposal to build on them would cause a great deal of harm. They should continue to be strongly protected as there is sufficient scope to meet housing need targets with the development of brownfield sites, tall buildings, and small sites without undermining a popular and effective policy, protection of the environmental value of green spaces and avoiding development in areas that are poorly connected.
- Other respondents argued the Green Belt should be reviewed and there are exceptional circumstances where it is justified for boundaries to be altered. Where it is assessed to be poor quality, unused or neglected they should be considered for new housing development. Golf courses and farmland could also be considered.
- Some respondents considered that the Council should include the Biodiversity Net Gain (BNG) requirement of 10% in the Local Plan. BNG could be set for different parts of the borough, should include requirements for tree planting and provision should be made for off-site provision. Both commercial and residential properties should be required to demonstrate that they have included any features required via a planning approval, which should be in place before development starts.
- Introducing an Urban Greening Factor score in line with the London Plan was supported. Particular consideration to urban greening is required in renewal areas and those facing significant disadvantage.
- Stronger policies on trees are required to protect existing trees as well as planting new ones in any development possible.
- Respondents considered that developers should ensure benefits to the local area through biodiversity within their new build projects; and that there should be strengthened requirements to protect existing wildlife and provide new habitats in all new build developments.
- Comments noted that planting of native mixed species hedgerows will improve biodiversity and address other needs, such as urban cooling, water uptake and transpiration, and soil carbon sink.

Evidence base

8.6 The following evidence base documents are being prepared to inform the new Local Plan green infrastructure, open space and biodiversity policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 7: Bromley's Green Infrastructure, Open Space and Biodiversity evidence

Evidence base document	Status
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).

Evidence base document	Status
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Open Space, Sport and Recreation Assessment evidence base	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Green Belt, Metropolitan Open Land and focused Urban Open Space study	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Review of Sites of Importance for Nature Conservation 2023	Complete, to be published alongside Regulation 18 draft (Summer 2025).

- 8.7 As required in the NPPF, the Council is undertaking a review of its Green Belt, Metropolitan Open Land and selected Urban Open Space sites. This review is looking at the extent to which Bromley's Green Belt, Metropolitan Open Land and selected Urban Open Space perform and contribute to their respective functions. It will also consider the implication of the introduction of 'grey belt' in the NPPF.
- 8.8 A partial review of Sites of Importance for Nature Conservation (SINCs) has been undertaken to ascertain the potential for upgrades to the grading of several existing SINCs; and the potential for the designation of a number of potential new SINCs.
- 8.9 The Council is preparing an update to the 2017 Open Space, Sport and Recreation Study which underpinned the open space policies of the existing Local Plan. The update will provide a refreshed audit of existing open space, sport and recreation facilities across the borough; highlight areas where there is sufficient provision; and identify areas where there are deficiencies in the quantity or accessibility of provision to open space and nature.
- 8.10 The Infrastructure Delivery Plan (IDP) includes a section related to open space, which will support policies that seek to maintain and enhance the borough's open spaces. The Local Plan Viability Study will assess the ability to deliver proposed green infrastructure, open space and biodiversity policy objectives.

What is the Council's preferred policy direction?

- 8.11 The Council will strive to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- 8.12 The Council will continue to strongly protect Green Belt, Metropolitan Open Land and Urban Open Spaces. The Green Belt, Metropolitan Open Land and focused Urban Open Space study will provide an up to date picture of the strength of these designations, setting out the degree to which they meet the purposes/criteria for designation. Other designated areas such as Local Green Spaces and the Kent Downs National Landscape (formerly Area of Outstanding Natural Beauty) will be strongly protected.
- 8.13 Sites with biodiversity value, including designated SSSIs and SINCs, will also continue to be afforded strong protection. The Council will seek to designate new and upgraded SINCs in line with the recommendations of the SINC review.
- 8.14 Resisting the unnecessary loss of open space in the Borough is very important in policy terms. Many existing sites have open space adjoining designated areas, and these provide a buffer between built development and the open land, to ensure that both the character and visual amenity are maintained.

- 8.15 The Council is keen to continue enhancing access to open space to improve poorer quality areas such that they provide a wider range of benefits. Updated deficiency mapping will identify particular areas where access to open space and nature should be prioritised.
- 8.16 The Local Plan will introduce Urban Greening Factor (UGF) as set out in the London Plan 2021, and BNG, which aims to leave the natural environment in a measurably better state than it was beforehand.

Summary of the Council's preferred policy direction for Green Infrastructure, Open Space and Biodiversity

1. Continue to strongly protect designated Green Belt, Metropolitan Open Land, Urban Open Space, Local Green Spaces and the Kent Downs National Landscape, in line with relevant evidence, legislation, policy and guidance.
2. Continue to strongly protect designated sites with biodiversity value such as SSSIs, and designate new and upgraded SINCs in line with new evidence.
3. Support the protection of and enhancement of open space that protects and enhances the open environment and improves quality of life.
4. Reflect the London Plan requirements for Urban Greening Factor in new developments.
5. Reflect the statutory Biodiversity Net Gain requirement of 10% for new developments, informed by the best available ecological information and addressed from the start of the development process.

Consultation questions - Green Infrastructure, Open Space and Biodiversity

1. Do you have any comments on the Council's the green infrastructure, open space and biodiversity evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the Green Infrastructure, Open Space and Biodiversity policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for Green Infrastructure, Open Space and Biodiversity?
4. Is there an alternative policy direction that you consider the Council should follow in relation to Green Infrastructure, Open Space and Biodiversity? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan Green Infrastructure, Open Space and Biodiversity policies?

9. Social and Strategic Infrastructure

- 9.1 Bromley's social and strategic infrastructure form the essential framework around which thriving, healthy and resilient communities can be maintained and enhanced. The Bromley Corporate Strategy 'Making Bromley Even Better' sets out a vision for everyone to lead healthy, safe and independent lives, and ambitions for children and young people to thrive, for older people to age well, for people to prosper in a safe, clean and green environment, and to enjoy a sustainable future.
- 9.2 Strong communities supported by a broad range of community, recreational and cultural opportunities, can benefit from enhanced physical and mental health, and quality of life, through access to health, education and leisure facilities, enhancing social interaction. The NPPF highlights the important role of planning in facilitating social interaction and creating healthy, inclusive communities advising that local authorities should plan positively for the provision of community facilities and produce strategic policies setting out an overall strategy for infrastructure and community facilities.
- 9.3 The nature of strategic infrastructure is changing, responding increasing demand for services, to the need to reduce waste and carbon emissions, to increase resilience to extreme weather and to the rapid changes in connectivity. The NPPF and the London Plan 2021 seek to ensure high quality digital infrastructure and transition to a low carbon circular economy to produce an efficient and resilient city.

What is our current policy approach?

- 9.4 Chapter 3 of the Local Plan sets out the overall strategy to support communities, through the provision of social infrastructure, such as education and community, recreation and leisure facilities, recognising that such infrastructure is intrinsic to delivering the vision and objectives for the Local Plan and supporting Bromley's Health and Wellbeing Strategy:
- Policy 20 sets the requirement to protect existing community facilities and promote sustainable locations for social infrastructure, supported by Policies 21 and 22 which specifically address opportunities for new social infrastructure in renewal areas and more accessible locations such as retail centres and existing retail frontages town centres, or as part of other new developments subject to their nature and scale.
 - Policy 23 seeks to resist the loss of public house where there are no others nearby and requires appropriate marketing to justify any loss, recognising their community and cultural value. It also requires design sympathetic to the heritage value and character of the original building.
 - Policy 24 safeguards land used as allotments, only allowing redevelopment with appropriate re-provision elsewhere and the retention of public open space within the redevelopment.
 - Policy 25 safeguards burial space and requires any new provision to secure future maintenance through planning obligation.
 - Policy 26 commits to work proactively with stakeholders to improve the physical and mental health of the Borough's residents and reduce health inequalities, requiring applications to consider the implications for, and maximise opportunities to enhance, health and wellbeing, optimising health benefits throughout scheme design. It also supports new / improved sustainably located health facilities and aims to secure appropriate health contributions through planning obligations.

- Policies 27 to 29 concern education uses. A number of education sites are allocated (at Appendix 10.4) to meet projected education need over the Local Plan period. Proposals for new educational facilities (including extensions to existing schools) which meet local need will be supported, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure. Such proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. Suitability will also be dependent on consistency with other policies including transport, open space and conservation policies. New education facilities should be designed sensitively, to minimise footprint and the impact on open space. Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.
- The Local Plan includes several strategic (or 'hard') infrastructure policies, relating to issues such as waste, utilities and transport schemes. Policy 125 (Delivery and implementation of the Local Plan) is an overarching policy which sets out how the Council will work with partners to deliver the vision, objectives and policies of the Local Plan. Developments will be required to provide for the infrastructure, facilities, amenities and other planning benefits that are necessary to support and serve it.
- Policy 58 seeks to retain sports, recreation and playing fields and will resist their loss unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements.
- Policy 89 concerns telecommunications development and applies to various types of commercial telecommunications apparatus including purpose built masts, cellular radio antennae, terrestrial microwave antennae and satellite antennae or dishes. The policy sets out criteria to assess telecommunications development.
- Policy 117 seeks to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users. Where there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements that will be completed prior to occupation of the development.

What feedback have we received so far?

9.5 The main issues raised during the Issues and Options consultation relating to the Local Plan social and strategic infrastructure chapter were as follows:

- Respondents noted the importance of social infrastructure in terms of delivering sustainable development, reducing inequalities and improving health and wellbeing.
- Comments identified the need to assess, protect and enhance the broad range of social infrastructure with specific reference to education, health, sports, leisure, cultural and police facilities, as well as green / public realm infrastructure.
- There was recognition of, and support for, the breadth of 'social infrastructure' overlapping with other chapters, for example cultural infrastructure (e.g. public houses), green infrastructure and open spaces, and opportunities for climate change mitigation and resilience.
- Respondents noted the need to align growth and infrastructure, and for new housing proposals to design in necessary enhancements to social infrastructure to support the development.
- Respondents identified the need to ensure the safety and accessibility of social infrastructure (with specific references to green infrastructure and transport infrastructure),

and the facilities needed to promote such accessibility (e.g. public and accessible toilets and transport).

- Some respondents suggested allocations for social infrastructure, and other opportunities for social infrastructure (e.g. occupying vacant units / flexible use of existing infrastructure).
- The need to protect existing strategic infrastructure on sites and the potential for new strategic infrastructure to reduce carbon emissions was raised.
- Respondents suggested utilising s106 agreements to support social infrastructure, with specific requests in relation to health, education, transport and policing.

Evidence base

- 9.6 The following evidence base documents are being prepared to inform the new Local Plan social and strategic infrastructure policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 8: Bromley's Social and Strategic Infrastructure evidence

Evidence base document	Status
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Playing Pitch and Outdoor Sport Supply and Demand Report	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Indoor Built Sports Facilities Supply and Demand Report	In progress, intention to publish with Regulation 19 draft (Summer 2026).
Bromley Retail and Leisure Study	Complete, to be published alongside Regulation 18 draft (Summer 2025).

- 9.7 The Playing Pitch and Outdoor Sports Supply and Demand Report provides analysis of playing pitches in the Borough, across a range of sports. The Bromley Indoor Built Sports Facilities Supply and Demand Report assesses the current provision of indoor built sports facilities within and close to the Borough, identifying need (demand) and gaps (deficiencies in provision). These studies will inform policies in the new plan concerning new and existing indoor and outdoor sports facilities.
- 9.8 The Infrastructure Delivery Plan (IDP) draws together a range of evidence regarding provision of facilities and identified needs for social and strategic infrastructure over the Local Plan period.
- 9.9 The Bromley Retail and Leisure Study indicates town centres are becoming more mixed use, reducing reliance on retail and introducing a broader range of uses notably leisure, community and cultural uses.

What is the Council's preferred policy direction?

- 9.10 In order to ensure sustainable and resilient communities across the borough, the Council will ensure the appropriate provision of social and strategic infrastructure through protection of existing social infrastructure and provision of new social infrastructure in suitable locations. Such infrastructure is integral to achieving sustainable development and ensuring that the borough can accommodate an expanding population and increased development. The shared

use of social infrastructure will be encouraged with support for the development of community hub providing a range of social infrastructure, and the temporary use of vacant buildings as 'meanwhile' community uses. The Council will, where appropriate, seek community use agreements to secure public use of privately operated social infrastructure.

- 9.11 The Council will continue to promote improved health and wellbeing across the varied communities within the borough throughout the Local Plan and will aim to ensure that the new Local Plan policies allow for consideration of the implications of new development proposals for health and wellbeing.
- 9.12 Changes to the Use Classes Order presents a number of challenges in respect of social infrastructure, which can fall across a range of use classes. The Council will seek to ensure that social infrastructure is protected and will consider the scope for protecting specific social infrastructure across different use classes, for example, through the use of planning conditions.
- 9.13 The Council will continue to strongly resist the loss of existing educational facilities and associated land, unless it is demonstrated that there is no longer a need for educational facilities. The delivery of new or expanded educational facilities to meet identified needs, identified through discussions with the Council's education service, will continue to be focused on sites that are allocated for education purposes.
- 9.14 The Council will support the provision and enhancement of sustainably located indoor and outdoor sport, recreation and play facilities, and will seek to resist the loss of existing provision unless no longer needed demonstrated through robust evidence. The Council will require management and maintenance plans for all new sports, outdoor recreation facilities and play provision, and will seek community use agreements to enable local communities to access the facilities.
- 9.15 Opportunities for activity are fundamental to health and wellbeing as the Joint Strategic Needs Assessment (JSNA) evidence base indicates, and therefore the Council encourages the enhancement of recreational opportunities and wider benefits provided by footpaths, bridleways, cycleways, and waterways.
- 9.16 With regards to strategic infrastructure, the Council supports the provision of the range of utilities, telecommunications and digital infrastructure in appropriate locations including more rural areas, and will require all major development proposals to demonstrate sufficient infrastructure capacity including electricity, water supply and wastewater discharge and heating and cooling infrastructure, including provision via decentralised energy networks where appropriate.

Summary of the Council's preferred policy direction for Social and Strategic Infrastructure

1. Protect and enhance the broad range of existing social infrastructure, recognising its role in supporting health and wellbeing and maintaining and developing community resilience.
2. Ensure that the provision of sufficient educational facilities to meet identified needs, including through the allocation of sites for new/expanded educational facilities where necessary.
3. Protect and enhance sports and recreational facilities and seek to secure enhanced public access through community use agreements.
4. Ensure the protection and provision of strategic infrastructure to ensure sufficient infrastructure capacity to meet the needs of the community over the Local Plan period.

Consultation questions - Social and Strategic Infrastructure

1. Do you have any comments on the Council's social and strategic infrastructure evidence base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the Social and Strategic Infrastructure policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for Social and Strategic Infrastructure?
4. Is there an alternative policy direction that you consider the Council should follow in relation to Social and Strategic Infrastructure? Please provide justification to support any suggested alternative policy direction.
5. Do you have any other comments that are relevant to the preparation of the new Local Plan Social and Strategic Infrastructure policies?

10. Transport

- 10.1 Bromley's transport networks are related to the distribution of the population, with better access and choice in the more densely populated areas, with access to public transport more limited in the rural areas. Public transport, cars, cycling, and walking are often used in combination to make journeys. All modes can play their part in the transport mix to provide genuine choice for residents.
- 10.2 The Council will strive to deliver an efficient, safe and sustainable transport system that will improve access for local communities, reduce traffic congestion, and support improved health outcomes for Bromley's residents.

What is our current policy approach?

- 10.3 Chapter 4 of the Local Plan – Getting Around (Transport and Accessibility) – sets out the planning policies to deliver plan objectives relating to reducing congestion, encouraging patterns of development that reduce the need to travel, supporting improved public transport and facilitating environments that encourage walking and cycling.
- Policy 30 sets out requirements for provision of off-street parking as part of new developments, with specific minimum and maximum parking standards per housing unit, based on relevant PTAL levels. Parking for all other types of development is to be provided at levels set out in the London Plan, as are requirements for blue badge parking and cycle parking.
 - The policy also requires provision of EV charging points and, where appropriate, car club spaces. For development where servicing problems may arise, off-street/rear servicing facilities are normally required.
 - Policy 31 directs any new development likely to be a significant generator of travel to locations accessible or capable of being made accessible by a range of transport modes, including public transport, walking and cycling. The policy sets out information requirements including the need to submit, where necessary, a transport assessment, travel plan, construction logistics plan, and/or delivery and servicing plan.
 - Policy 32 states that the Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected.
 - Policy 33 concerns accessibility and seeks to promote ease of access to all parts of the Borough and all new development, by ensuring that the design of road alterations and public realm improvements considers a range of users. The policy also states that provision or contribution to suitable infrastructure improvements may be required as part of development proposals.
 - Policy 34 sets out policy on highway infrastructure, including criteria to assess proposals for new vehicle accesses and new or extended vehicle crossings.
 - Policy 35 sets out the Council's transport investment priorities, noting the aim to work with and lobby partner agencies including Transport for London (TfL), Network Rail and the Department for Transport (DfT) to secure investment in transport infrastructure for the benefits of the Borough, such as increasing capacity, reducing congestion, and making improvements to public transport. Policy 36 safeguards land for various transport improvement schemes to tackle existing congestion issues and facilitate new development.

What feedback have we received so far?

10.4 The main issues raised during the Issues and Options consultation relating to the Local Plan transport chapter were as follows:

- Some respondents felt there was too much priority currently given to cyclists whereas others said there should be more emphasis on improving the cycle network, including the provision of cycle parking adjacent to stations.
- Some respondents suggested that car-free development should be promoted, and identified potential use of CIL funds and Section 106 contributions to fund improvements to cycling and walking infrastructure. New development should be located in sustainable locations to help facilitate car-free development, with parking standards aligned to the London Plan. Conversely, a number of respondents supported continuing to plan for car use, including through the provision of more car parking in new development.
- Some respondents suggested working with transport providers to improve public transport usage and connectivity via a range of modes of transport. The Local Plan should promote the development of new transport infrastructure outlined in the London Plan. Respondents identified the need for better connections within the borough, and to neighbouring boroughs and Central London; the DLR extension, Bakerloo Line Extension and Tramlink extension should all be considered.
- Comments suggested that green spaces, and walking routes within these spaces, should be considered as part of sustainable transport improvements. There must be age and child-friendly streets and public spaces, with mandated crossings linking to schools and parks; with the widening of pavements to facilitate better pedestrian access.
- The need for better accessibility for disabled and elderly people was raised. Parking restrictions should be carefully considered in regard to disabled and elderly car users who may be more reliant on their cars.
- Respondents suggested that public realm should be encouraged in all appropriate developments and the benefits should be fully considered in any planning application. Walking should be encouraged through a well-designed, well-connected and functional public realm.
- A number of respondents identified the need for better and improved access to EV Charging Points. There should be provision for EV charging for every new parking space granted permission.

Evidence base

10.5 The following evidence base documents are being prepared to inform the new Local Plan transport policies. In addition to these documents, there may also be a number of additional sources of evidence, including evidence produced by external stakeholders, that the Council will have regard to when preparing the new plan.

Table 9: Bromley's Transport evidence

Evidence base document	Status
Bromley Infrastructure Delivery Plan	Working draft to be published alongside Regulation 18 draft (Summer 2025).
Bromley Local Plan Viability Study	In progress, intention to publish with Regulation 19 draft (Summer 2026).

10.6 The Infrastructure Delivery Plan (IDP) will be used to underpin relevant emerging policy including policy on transport. The IDP includes a section on transport which considers borough's transport infrastructure and potential future demand. This will help to support policies that seek to secure investment in transport infrastructure for the benefits of the

borough, such as increasing capacity, reducing congestion, and making improvements to public transport.

- 10.7 The Local Plan Viability Study will assess the ability to deliver proposed transport policy objectives.

What is the Council's preferred policy direction?

- 10.8 The Council is keen to ensure that all transport modes have a role to play in improving access for local residents. The needs of all modes of transport will be considered as part of preparing the new plan, including sustainable transport modes (walking, cycling, public transport) and instances where access by car is necessary. The policies in the new plan will ensure that the transport related impacts of development proposals can be properly assessed, including detailed requirements for transport assessments for certain applications.
- 10.9 Residential car parking standards are set out in the London Plan 2021, which limits the scope for bespoke Bromley standards. However, where there is flexibility for locally specific standards, such as in PTAL 0-1 areas, the Council will explore the potential of Bromley specific parking standards. For other uses, and in relation to cycle parking, the Council intends to follow the standards set out in the London Plan.
- 10.10 The Council will also explore the potential for increasing the requirement for active EV charging points.

Summary of the Council's preferred policy direction for Transport

1. Ensure continued accessibility across a range of transport modes.
2. Set out clear requirements to allow robust assessment of the transport impacts of new applications.
3. Strengthen policy on residential car parking standards as far as possible.
4. Accord with the London Plan on cycle parking standards and parking standards for uses such as offices and retail.
5. Investigate requirement for increased provision of active EV charging points.

Consultation questions - Transport

1. Do you have any comments on the Council's transport base, either published or evidence that is being prepared?
2. Is there any additional evidence that you consider is necessary to inform the transport policies in the new Local Plan?
3. Do you have any comments on the Council's preferred policy direction for transport?
4. Is there an alternative policy direction that you consider the Council should follow in relation to transport? Please provide justification to support any suggested alternative policy direction.

5. Do you have any other comments that are relevant to the preparation of the new Local Plan transport policies?