

Local Plan Consultation Statement

July 2025

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1 Introduction

1.1 Introduction to the Local Plan Review

- 1.1.1 Bromley's Local Plan was adopted in 2019 and is part of the Bromley Development Plan that the Council uses to manage development and determine planning applications in the Borough.
- 1.1.2 It is important that the Local Plan remains up-to-date, and it is currently in the process of being reviewed and updated. An up-to-date Local Plan will allow the Council to plan for the next fifteen years.

1.2 Previous Consultation

- 1.2.1 The purpose of this consultation statement is to summarise the feedback received in response to the "Issues and Options" Local Plan consultation document published in April 2023. This consultation was the first formal consultation relating to the broad topic areas to be covered in the new Bromley Local Plan (Regulation 18). The document also summarises the responses received to the Call for Sites exercise undertaken in 2021.
- 1.2.2 The "Issues and options" consultation document outlined the current policy approach across a range of topics; noted relevant changes since the adoption of the Local Plan; and set out how the new Local Plan could respond to these changes. It did not set out any intended policy approaches and included a number of questions for each topic area.
- 1.2.3 The consultation ran for a 9-week period between 28th April 2023 to 30th June 2023.
- 1.2.4 Further information about the process and timetable for preparing the new Bromley Local Plan can be found in the Council's Local Development Scheme¹.

1.3 Purpose and Scope

- 1.3.1 Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that any submission of documents and information to the Secretary of State should be accompanied by a statement setting out:
- Which bodies and persons the local planning authority invited to make representations under Regulation 18;

¹ [Bromley Local Development Scheme \(2025\)](#)

- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations under Regulation 18; and
- How any representations made pursuant to Regulation 18 have been taken into account.

1.3.2 For the Local Plan examination under Regulation 22, the Council will be required to submit a statement summarising the main issues raised during the Regulation 18 and 19 consultations, including how these representations were taken into account. It also needs to include details on who was invited to participate in the consultations and how the consultations were carried out. This provides a clear understanding of the plan's development, respondent feedback, and the Council's response.

1.3.3 The Statement of Community Involvement (SCI) sets out the Council's policy for involving the community in the preparation, alteration and review of planning policy documents and in deciding planning applications. The Council is required to undertake consultations on planning policy documents in line with the SCI².

1.3.4 The 'Duty to Cooperate' is a legal requirement for local authorities to engage constructively with other relevant bodies on strategic cross-boundary planning matters. For the next stage of the Local Plan, the Council will prepare a statement demonstrating how it has complied with the Duty to Cooperate requirements.

1.3.5 The Regulation 18 summaries in this document highlight the main issues at this stage of consultation, as well as who was invited, how the consultations were conducted, and how the representations were considered. This summary report will form part of the Regulation 22 consultation statement.

² [Revised Statement of Community Involvement](#)

2 Summary of Consultation Process

- 2.1.1 Bromley’s “Issues and Options” document consultation ran for a 9-week period between 28th April 2023 to 30th June 2023.
- 2.1.2 Residents and interested parties were able to view all of the consultation material on the Council’s website and at the Council’s main office, and were able to submit representations through multiple means, including the online survey, email, and by post. Examples of what were produced as part of the consultation publication can be found in Appendix 1.

Mailing Lists (Email and Letter)

- 2.1.3 Approximately 1,670 contacts are subscribed to the Council’s mailing list. The Council’s planning mailing list consists of local residents, friend groups, businesses, developers and agents who have expressed an interest in receiving planning updates from the Planning Policy team.
- 2.1.4 All of these contacts were notified of the consultation by email or letter. This included information on the document the Council was reviewing and for what purpose, information on how to view the document either online or in hard copy form through visiting the Bromley Civic Centre, how to respond and when the deadline to respond was, how to contact the Planning Policy team for information related to the consultation, and how to amend their data status.
- 2.1.5 Notifications were also sent to all Councillors, members of the Bromley Economic Partnership and the borough’s Residents’ Associations.

Online

- 2.1.6 The Issues and Options document was published on the Council’s website at the start of the consultation period³. It was accompanied by information on how access the document, how to respond to the consultation, and how to contact the Planning Policy team for any additional information or queries.
- 2.1.7 The online survey was structured using questions outlined at the end of every chapter topic in the Issues and Options document. These covered key issues that should be addressed in the Local Plan, particular topics that could be specifically included in policy to tackle those issues, and what the Local Plan could do more to promote.

³ <https://www.bromley.gov.uk/planning-policy/review-bromley-local-plan>

Digital Posters

- 2.1.8 Digital posters were put on display on the Bromley and Orpington town centre JCDecaux screens, and additional posters were also displayed in prominent locations like libraries to promote the consultation.

Press Release

- 2.1.9 The Council sent a press release to local newspapers notifying residents and interested parties of the consultation and provided ways in which responses could be submitted. A formal public notice was also published in the local media.

Our Bromley Magazine and Newsletter

- 2.1.10 A news article was published in Our Bromley Magazine and Our Bromley Newsletter. Our Bromley Magazine reaches every household in the borough with a mixture of council news and services. There is also an online newsletter that residents can sign up to receive news and updates online. A reminder the consultation was still ongoing was published on 26th June.

Social Media

- 2.1.11 The Council also used its social media accounts to promote the consultation, publishing information on Facebook, Instagram and Twitter.

3 Summary of Call for Sites Feedback

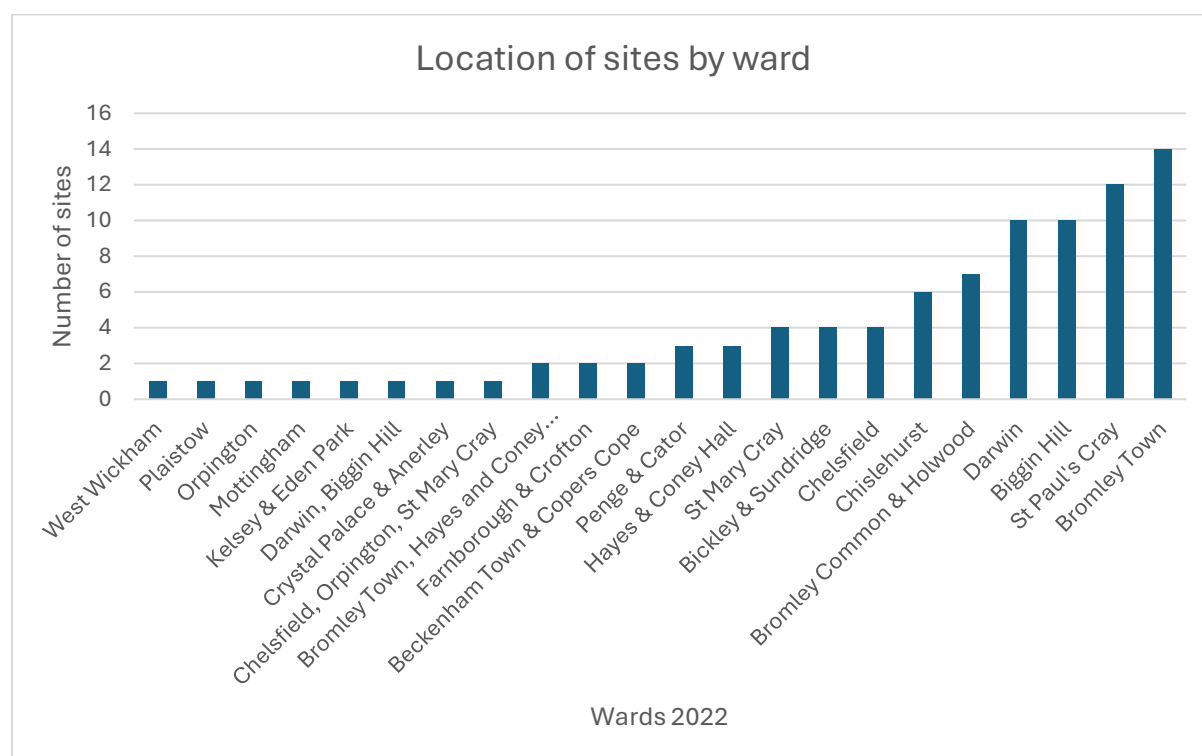
3.1 Call for Sites

3.1.1 As a first step in the process of updating the Local Plan, the council undertook a call for sites consultation exercise, between August and November 2021. As part of this exercise landowners, developers and other interested parties were invited to put forward potential development sites for allocation, for development of housing, employment and retail uses or any other uses.

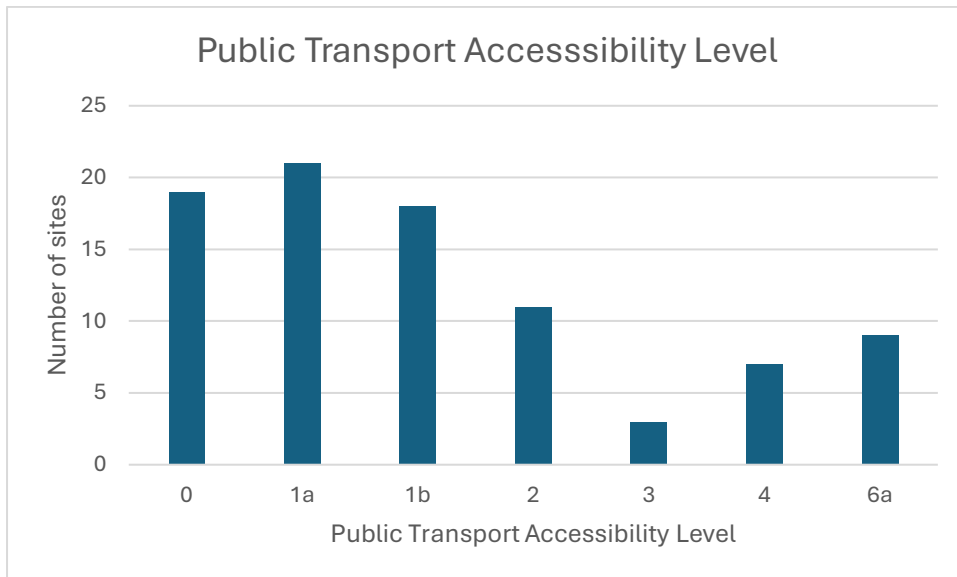
Submitted Sites

3.1.2 A total of 91 sites were submitted. 2 of these sites are the same site but were submitted with different site options for uses. 9 of the sites are already allocated in the adopted Local Plan.

3.1.3 The sites are located across the Borough. Some sites cross ward boundaries. The greatest number of sites were submitted in the Bromley Town ward, followed St Paul's Cray, Biggin Hill and Darwin wards.



3.1.4 The public transport accessibility level of the sites varied. However, the majority of sites submitted have the lowest level of public transport access.

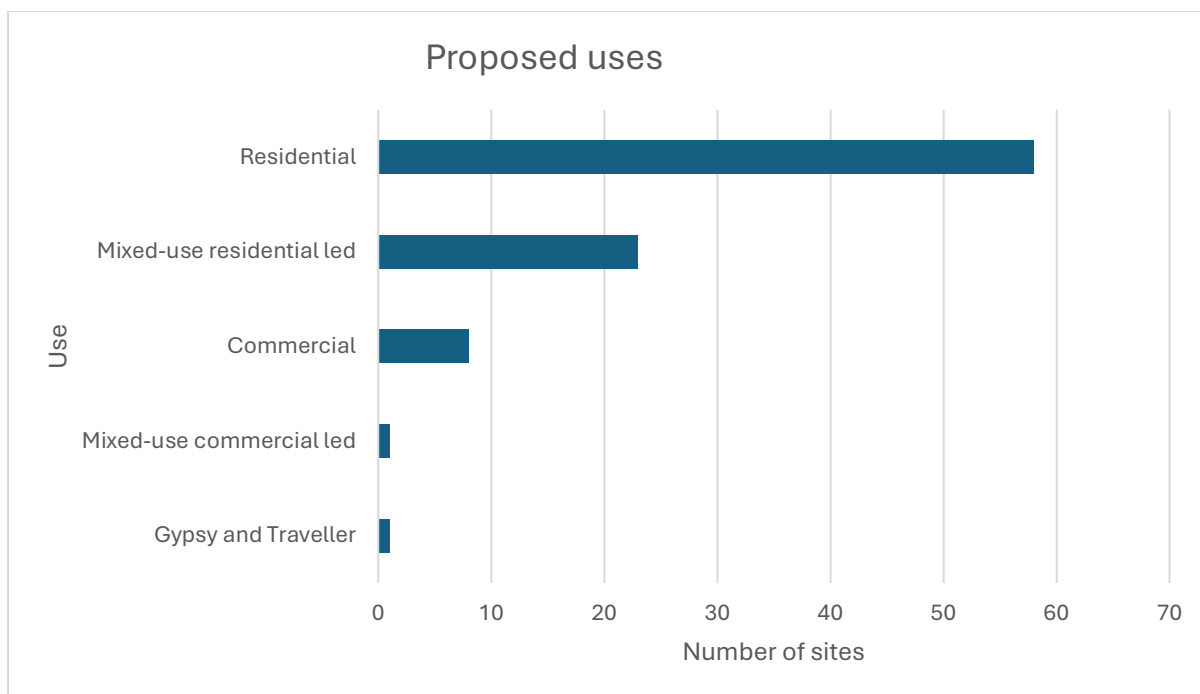


3.1.5 10 of the submitted sites are smaller than 0.25 hectare. This is the definition of a small sites in the London Plan 2021.

3.1.6 The submitted sites have a range of constraints and policy designations:

- 59 sites are Green Belt, 3 sites are Metropolitan Open Land and 1 site is Urban Open Space. No Local Green Spaces were submitted.
- 10 of the sites contain a SINC and 4 contain a SSSI, with one of these sites being both a SINC and an SSSI.
- 15 of the sites are within a Conservation Area and 1 site is within an Area of Special Residential Character.
- 16 of the sites are within a town centre.
- 1 site is within a Strategic Industrial Location, 1 site is within a Local Strategic Industrial Location, 7 sites are within a Business Improvement Area and 6 sites are within an Office Cluster.

3.1.7 The sites were submitted for a range of uses, with the majority of sites submitted for residential or mixed-use residential led development.



3.1.8 Submitted sites will be considered for allocations as part of Local Plan preparation, taking into account national and regional policy and guidance, local evidence across a range of topics and the need for different uses.

3.1.9 Six responses provided general responses or identified issues that should be considered when considering sites. These are set out in the table below.

Respondent	Main Feedback Received	Our Response
Environment Agency	<p>Site allocations should be informed by the latest environmental data, mapping and evidence such as climate change allowances and up to date Strategic Flood Risk Assessment.</p> <p>Site allocations should be assessed against a range of environmental issues and opportunities, including flood risk from a range of sources, proximity to waste management and industrial uses and potential environmental improvement projects.</p> <p>Sites should only be allocated which can pass the Sequential Test and Exception Tests.</p> <p>Support for the ongoing partnership working to improve the Ravensbourne catchment and planning's role in improving the water environment and management flood risk.</p> <p>Development should not encroach within 8 meters of a main river or associated flood defence and residential development should be considered for a minimum of 100 years.</p>	<p>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. This will be informed by the latest data 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.</p> <p>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. Comments on how flood risk is considered on a site and deculverting projects will be considered as part of policy drafting and preparation of the Infrastructure Delivery Plan.</p>

Respondent	Main Feedback Received	Our Response
	<p>Floodable voids are not an effective means of floodplain compensation.</p> <p>Development should consider deculverting and naturalising of sections of main river within a site's ownership.</p> <p>Developers should aim to achieve a 10% biodiversity net gain within the aquatic as well as terrestrial environment.</p>	<p>The Local Plan will reflect the statutory Biodiversity Net Gain requirement of 10% for new developments.</p>
Historic England	<p>The Council needs to have regard to any potential impacts on the historic environment when considering likely development sites.</p> <p>Policies and sites should be based on adequate, up-to-date and relevant evidence base relating to the historic environment. Historic England have published a number of advice notes that may be relevant when considering sites.</p> <p>Any proposed area for possible development will need to be considered against the issues and limitations identified in the review of the Borough's Archaeological Priority Areas in 2020.</p>	<p>The Council is preparing a Characterisation Study, which will identify different areas with similar characteristics, their capacity for growth and where character should be conserved, enhanced or transformed.</p> <p>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. 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.</p>

Respondent	Main Feedback Received	Our Response
Highways England	Highways England highlighted that the Secretary of State for Transport owns and manages land within some areas of the borough and a list of land available for sale is publicly available.	Comment noted.
Natural England	No Comment	Comment noted.
CRPE	<p>3.1.10 CPRE provided a list of sites they consider would make a strong contribution to delivering housing in a sustainable way in Bromley. They also raised the following issues:</p> <ul style="list-style-type: none"> new housing development must reduce the number of cars in the borough and car parks should be removed and replaced with car-free housing. low-density, previously developed sites should be promoted and intensified for housing and commercial spaces as well as creating new neighbourhood centres where amenities can be reached on foot. the Council should prepare a Supplementary Planning Document 	<p>The submitted sites will be considered. 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.</p> <p>The Local Plan policies will address parking standards and the location of tall buildings. The Local Plan will also consider the role of small sites in delivering new housing.</p> <p>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. Any 'grey belt' release will only be considered once all other options for meeting these</p>

Respondent	Main Feedback Received	Our Response
	<p>to promote suburban intensification at junctions and residential roads near to stations.</p> <ul style="list-style-type: none"> • high-rise blocks in Bromley Town Centre should be avoided. • allocating Green Belt for housing should be avoided and Green Belt constraints should be reflected in the borough's housing targets. 	<p>development needs have been explored (e.g. on brownfield sites).</p>
Apterfield Green Belt Action Group	<p>Green Belt should be protected from unnecessary building schemes and priority should be given to brownfield sites because they are available and have the required infrastructure in place.</p>	<p>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. 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).</p>

4 Summary of Issues & Options Consultation Feedback

4.1 Response Overview

4.1.1 In total, 267 responses were received to the Issues and Options consultation:

- 147 were received via the online survey
- 120 were received via email.
- 0 were received via post.

4.1.2 These ranged from public bodies, businesses and developers to friend and community groups and individuals. From those 267 responses, 1,261 comments on the key themes of the consultation document were recorded.

4.1.3 51 sites were submitted as part of the Issues and Options consultation. They were put forward for a range of uses, including housing (including older persons housing), employment, education, open space, retail and sports uses. 21 of these uses were already submitted during the Call for Sites exercise. The sites will be treated in the same way as sites submitted via the Call for Sites exercise and will be considered for allocations as part of Local Plan preparation, taking into account national and regional policy and guidance, local evidence across a range of topics and the need for different uses.

4.1.4 The Council has taken these comments into consideration when preparing the Direction of Travel document. Responses have been summarised, and not every comment is included verbatim. These have been broken down by theme below.

4.2 Visions, Objectives and Spatial Strategy

4.2.1 181 comments were received relating to the Local Plan's Vision, Objectives and Spatial Strategy. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Key Issues for the Vision and Objectives	<p>Respondents had a range of views on the key issues that should be reflected in the new Local Plan Vision and Objectives:</p> <ul style="list-style-type: none"> Some respondents identified affordable housing, housing suitable for families, young people, housing for older people and the borough's most vulnerable residents as the key issues for the Local Plan vision and objectives. A standalone policy for older persons' housing should be included in the Local Plan. Several developers and landowners argued that there should be more ambition and a firmer commitment in the Local Plan Vision to meeting Bromley's housing needs in full, given the Council's past under delivery and performance in the Housing Delivery Test. The Vision should be clear on the presumption in favour of sustainable development. 	<p>The Direction of Travel document sets out the draft Vision and Objectives for the new Local Plan. These have been developed from the Council's Corporate Strategy 'Making Bromley Even Better 2021 – 2031'. This is to ensure the Local Plan aligns with the Council's priorities. The draft Objectives address the issues raised during the Issues and Options consultation and will:</p> <ul style="list-style-type: none"> Ensure housing is adaptable to meet the needs of residents as the population ages, including through the provision of supported and older person housing. Deliver an appropriate supply of homes in sustainable locations that meet the varied needs and incomes of Bromley's residents. 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.

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> One respondent stated the Council's corporate plan is not an appropriate evidence base document for the strategic vision given the need for the Vision and Objectives to respond to the need to deliver a sufficient number and range of housing. Another respondent states the Corporate Strategy does not address resilience such as the area's exposure to excessive heat, extremes of flooding, and pressures on habitat and species, and the adaptations needed in how land and assets including green and blue infrastructure are managed. Developers and landowners argued 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. Significant weight should be placed upon the need to support economic growth and productivity. Climate change, achieving net zero, reducing emissions and improving biodiversity should be reflected, including in relation to heritage assets. Benefits for the local community from new developments should be secured, such as 	<ul style="list-style-type: none"> 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. Ensure development complements and enhances local character and the historic environment, delivers high quality design and minimises its environmental impact. 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. 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. Create accessible and healthier environments to support people to live fuller, longer and healthier lives and to reduce health inequalities.

Themes and Policies	Main Feedback Received	Our Response
	<p>social housing. Renewal areas should also remain a focus.</p> <ul style="list-style-type: none"> • Balancing new housing against increasing density on already densely populated wards. • Changes to town centre and demand for retail floorspace whilst protecting local shopping parades and employment. • The Vision should be about creating and maintaining a culture of wellbeing in inclusive communities. • Historic England welcomed the identification of the historic environment as part of the overall vision. They identified that delivering the scale of housing growth envisaged across the plan-period in a contextually successful manner that conserves heritage significance, historic and townscape character is a key issue. Other respondents supported the protection and enhancement of the borough's heritage buildings and townscape character. • NHS partners highlighted it is important for health to be considered throughout the policy framework. 	<ul style="list-style-type: none"> • Secure investment in critical public transport infrastructure to improve connectivity to and from Bromley. • 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. • Reduce road congestion and encourage patterns of development that ensure good access to public transport and are safe for pedestrians and cyclists.

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • There should be objectives to improve the provision of public transport, including improved radial bus routes, the extension of the Bakerloo Line into Hayes and the inclusion of South London rail services into London's Overground Service. • The Environment Agency stated further emphasis should be placed on enhancing natural environments and reflecting the value of green and blue infrastructure. Other respondents stated the Council should improve the water quality of Bromley's rivers. • Improving public transport and reducing reliance on cars, including reducing use for shorter journeys. • Building homes that people want to live in and not just what developers want to provide. • The Council should be more open to the opportunities for self-build properties to help meeting housing targets. • Revitalise the Borough's high streets. 	
Locations for new development	Respondents had mixed views on where new development should be focussed:	The Spatial Strategy, along with the housing policies and site allocations, will set out where development will be directed to.

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> Some respondents argued that development should be focussed on brownfield sites in highly accessible and town centre locations, particularly Bromley and Orpington Town Centres. This could include empty or underused buildings, office buildings, car parks and housing above shops and cafes. These sites should be optimised in line with London Plan policies. There should be a continued focus on infill the more suburban parts of the borough. Biggin Hill has been identified as a strategic growth area and the Council should retain the SOLDC designation to be clear it is an area within the borough that can support further economic growth. This should be supported by sufficient infrastructure, including new homes for workers. Opportunities at Bromley North, Bickley and Bromley South stations should be retained in the new Local Plan. Housing should be spread out in such a way it does not excessively increase traffic on the Strategic Road Network at a single location. 	<p>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.</p> <p>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).</p> <p>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.</p> <p>The Local Plan will also look at the role of small sites in delivering new housing.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • A couple of respondents stated the amount of development should consider the character of different parts of the borough. • Focus on improving Orpington, including the retail and food and drink offer. • Some respondents objected to new development in the borough. One respondent argued there are empty homes in other parts of the country where development should be focussed. 	
Green Belt	<p>Several respondents called for the Council to undertake a Green Belt review, arguing:</p> <ul style="list-style-type: none"> • The Council should work jointly with adjacent authorities to deliver sustainable urban extensions to settlements located to the west of the Borough, chiefly to the east of New Addington. Other edge of settlement land should be identified. • Releasing Green Belt is the only means of delivering sufficient homes as housing needs cannot solely be met by optimising brownfield sites. • Business growth should be located where businesses and inward investors wish to locate and consider sites with access to rail 	<p>As required the National Planning Policy Framework (NPPF), the Council is undertaking a review of its Green Belt, as well as 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.</p> <p>It will also consider the implication of the introduction of 'grey belt' in the NPPF. 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).</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>and bus infrastructure as well as the strategic road network. Ancillary uses such as cafes and nurseries should be encouraged.</p> <ul style="list-style-type: none"> • The new Local Plan should recognise the role that appropriately and sustainably located greenfield sites can play in delivering and facilitating large-scale regeneration benefits. • Some sites could be developed for affordable housing with a high BNG score. • Green Belt should be released where the land is performing poorly against Green Belt purposes and where sites are sustainably located. • The Council should explore new suburbs on land that has been intensively adapted, such as golf courses. <p>A large number of respondents argued the Green Belt, Metropolitan Open Land and other open spaces should be protected. They stated it is important for health and wellbeing, biodiversity, access to open space in proximity to people's homes and mitigating climate change. Some Green Belt sites could be turned</p>	<p>The new Local Plan will also contain policies on Green Belt that continue to strongly protect it as well as other open spaces.</p>

Themes and Policies	Main Feedback Received	Our Response
	into parks and nature reserves. The borough's woodlands should also be protected.	
Major constraints to be considered as part of the Spatial Strategy	<p>A couple of respondents argued that prescriptive design principles may stifle opportunities to maximise development potential on key site allocations.</p> <p>The Kent Downs Area of Outstanding Natural Beauty (AONB) Unit stated that the policies for protecting Areas of Outstanding Natural Beauty may mean it is not possible to meet objectively assessed needs for development and the Kent AONB remains a constraint.</p> <p>Other major constraints to development include:</p> <ul style="list-style-type: none"> • Protected views and the impact of tall buildings. • The capacity of the sewage system and other infrastructure such as health and transport infrastructure. • Conservation designations such as Sites of Importance for Nature Conservation. 	<p>The Spatial Strategy (in conjunction with detailed policies and site allocations) will set out the location, scale and phasing of development that will come forward over the plan period. This will take account of the borough's constraints and planning policy designations to identify what type of development is suitable in different parts of the Borough.</p> <p>The Council will allocate sites for the development of particular uses, to assist with meeting identified development needs. 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. 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.</p> <p>The new Local Plan will contain policies that continue to protect the Kent Downs National Landscape, in line with relevant evidence, legislation, policy and guidance. It will also</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> Green and blue assets, including risk to public health and livelihoods from risk of flooding. <p>A number of respondents said Bromley is suburban borough which will not benefit from tall buildings, which are incompatible in close proximity to Conservation Areas. Building heights should be limited and low-rise development supported. Some respondents cited Croydon and Lewisham as the types of development the Council should avoid.</p>	<p>contain policies that protect Sites of Importance for Nature Conservation.</p> <p>An updated Strategic Flood Risk Assessment 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.</p> <p>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 as set out in the draft Infrastructure Delivery Plan.</p> <p>The Bromley Characterisation 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. The Spatial Strategy will be supported by a series of place-specific policies,</p>

Themes and Policies	Main Feedback Received	Our Response
		<p>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. Work will also be undertaken to identify where in the borough is suitable for tall buildings.</p>
Other Responses	<p>Respondents also raised the following points on the topic of Vision and Objectives and the Spatial Strategy:</p> <ul style="list-style-type: none"> • Improve the standard of housing stock, including better quality affordable homes. • Improve pedestrian safety and movement. • Improve air quality. • Reduce noise from road vehicles and aircrafts. • Policies should require development to comply with fire safety regulations and the Equalities Act in terms of accessibility and the requirements of those with different protected characteristics. • New development should include open spaces. 	<p>The majority of these topics will be addressed through policies in the Local Plan. Some of these topics, such as the cost of parking and the quality of retailers, cannot be addressed through planning:</p> <ul style="list-style-type: none"> • The design and housing policies will contain design standards for new homes and the housing policies will set requirements for affordable housing. • The transport policies will ensure accessibility across a range of transport modes, including walking. • The sustainability policies will require development to mitigate the impact of pollution, include air and noise. The Local Plan will include a policy on Biggin Hill airport.

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • The plan period for the new Local Plan should be set out and included on the front cover of the Local Plan. • Eliminate homelessness. • Address the pressure on schools, hospitals, and health centres. • Chislehurst Commons should be considered a major heritage asset alongside Downe, Crystal Palace and Biggin Hill. • Reduce volume of traffic in the Borough and loss of front gardens to parking. • The expansion of Biggin Hill Airport in proximity to large residential areas due to the impacts of noise and other pollution. • New and improved leisure facilities. • Lack of transparency and engagement. Respondents argued local residents should be listened to and submissions from developers should be scrutinised and verified. • Increasing number of poor-quality retailers in Bromley Town Centre and reducing vacancies in the Glades. • Car parking should be free and available to everyone. 	<ul style="list-style-type: none"> • 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 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. • The plan period is set out in the Direction of Travel document. • The draft 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. • The retail policies will set out the mix of uses supported in town centres to ensure they are vibrant and viable.

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • The Council should setup a recycling partnership with Bexley to help recycle more materials. • Crime and antisocial behaviour need to be addressed. 	<ul style="list-style-type: none"> • The transport policies will set parking standards for new development, although the Local Plan cannot influence the price of public parking. • The waste policies will ensure that development proposals follow the waste hierarchy, from design to use, reuse, demolition and final disposal. The Local Plan cannot include policies on specific recycling schemes. • Development proposals will be required to adopt a people focused approach in order to deliver safe, inclusive, accessible, functional and resilient places.

4.3 Housing

4.3.1 192 comments were received relating to housing. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Locations for new housebuilding in the borough	<p>A large number of representations were received from residents, developers and local groups who made numerous suggestions for where new housebuilding could be focused in Bromley including different types of new housing:</p> <ul style="list-style-type: none"> • Brownfield sites. • Infill sites including those close to public transport links. • Town centres and urban centres including new taller buildings that could also support businesses. • Sites within the outskirts of major towns to ensure there are good transport links and accessibility. • Good design, allowing housing to be built anywhere. • Limit new housing development to 3-4 storeys in urban areas. • Small developments including a mix of housing, on existing open land with good facilities and infrastructure. 	<p>The Council will continue to prioritise brownfield land to protect the borough's Green Belt and Metropolitan Open Land from inappropriate development.</p> <p>The Council will seek to meet housing 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.</p> <p>As required the National Planning Policy Framework (NPPF), the Council is undertaking a review of its Green Belt, as well as 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</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Use of vacant properties including vacant housing and Council property to provide decent family homes. • Use of underused or surplus employment sites and surplus high street retail space. • Within run down areas, alongside good quality affordable housing. • Sites close to infrastructure including schools, GP surgeries and family centres. • Redevelopment of older properties on large plots and new housing via extensions or conversions of existing properties. • Allocated land for self-build purposes. • Within less populated areas to avoid squeezing people into areas including outside of town centres. • New modular housing could allow flexibility on small infill sites. • Consider Green Belt sites after brownfield site options. • Greenfield sites including Green Belt and underutilised Metropolitan Open Land (including sustainable sites to accommodate family housing and older person accommodation). 	<p>Open Spaces perform and contribute to their respective functions.</p> <p>It will also consider the implication of the introduction of ‘grey belt’ in the NPPF. Any ‘grey belt’ release will only be considered once all other options for meeting these development needs (including housing) have been explored (e.g. on brownfield sites).</p> <p>The Council will prepare evidence to investigate the role of Small Sites in housing delivery as part of preparations for the new Local Plan. The scope and parameters will be subject to further consideration and will be informed by the Council’s Characterisation Study.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Greenfield land can deliver houses, affordable housing and infrastructure without the viability challenges of brownfield land. • Option to develop new suburbs, within the Green Belt including golf courses. 	
Unsuitable locations for new housebuilding	<p>Some representations made suggestions about where housing should not be located or expressed various concerns related to new housing including:</p> <ul style="list-style-type: none"> • Avoid developing Greenfield and Green Belt sites. Where they are developed, there should be a substantial environmental gain. • Avoid development on garden land. • Further expansion of Bromley, Beckenham and Orpington likely to have adverse impact on environmental objectives of NPPF. • Avoid the infilling of green spaces within densely populated estates. • Avoid development in town centres including Bromley Town Centre. • No high-rise buildings in Orpington or on higher ground. 	<p>As required the National Planning Policy Framework (NPPF), the Council is undertaking a review of its Green Belt, as well as 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. Any 'grey belt' release will only be considered once all other options for meeting these development needs (including housing) have been explored (e.g. on brownfield sites).</p> <p>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</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Penge was considered inappropriate as it is already overcrowded and not adequately funded in relation to schools and infrastructure. • Family housing should not be demolished to be replaced by flatted development that would be of a lower quality. • There is not a need for additional housing generally and additionally a further influx of people, houses and vehicles cannot be supported. • Avoid recreating housing design of the past, Bromley is not characterised by high rise developments. • Infill development could adversely impact on ASRC layouts. • Tall buildings can be associated with safety and access concerns, not always suitable for families and people with limited mobility and can destroy areas and townscape. There is also an impact from tall buildings on neighbouring properties' light, wellbeing and social inclusion. Tall buildings can constrain affordable housing provision. 	<p>seek to ensure that any proposals are subject to robust criteria including assessing the impact on existing and future residential amenity and ensuring the continued provision of family units.</p> <p>Much of the borough is unsuitable for tall buildings. In developing policies for the new Local Plan relating to tall buildings, 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 Bromley Tall Building Strategy and London Plan 2021 policy D9.</p>

Themes and Policies	Main Feedback Received	Our Response
Forms of new housing in the borough	<p>Responses highlighted that there will be different housing options and needs across the borough when planning to deliver future housing. There were a large number of representations received by residents setting out ideas for new forms of housing. These included the following:</p> <ul style="list-style-type: none"> • First time buyer type housing including flats or houses (including family units for different unit types). • Prioritise housing for Traveller and Showpeople. • Family homes including three bedrooms (terraced and semi-detached) to help build communities allowing for upgrading from flats when needed. • Taller buildings may be appropriate but should be in keeping with the surrounding area and in areas already deemed appropriate. Schemes should be design-led. • Tall buildings should be located in town centres, including Bromley Town Centre. Other representations cite 6-10 storeys as an appropriate height in town centres. 	<p>A Strategic Housing Market Assessment (SHMA) has been commissioned to update the previous 2014 South East London SHMA. The assessment will examine the overall need, size, type and tenure of housing needed for different groups (including older people, students and houses in multiple occupation) 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.</p> <p>The new Local Plan will include housing allocations and housing policies that will help guide large and small development sites.</p> <p>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.</p> <p>A London-wide Gypsy and Traveller Accommodation Needs Assessment is currently being undertaken by the GLA and will help to inform the Local Plan policy on Travellers (including Gypsies, Travellers and</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Sites with high PTALs are considered to be appropriate as they can have low levels of parking and higher density development. • New housing should relate to the surrounding buildings in terms of scale, massing, materials and size. • Mixed use developments are encouraged, new retail should incorporate housing above. • Flats of one to four storeys or up to six storeys to maintain the suburban feel. • Small infill sites subject to the need for attention to biodiversity. Some residents feel that small infill site developments could create a community feel and should be a priority. There is concern though that overcrowding should be avoided on infill sites. • Small infill sites for sensitive development should also include conservation areas. Smaller sites can put less pressure on current infrastructure and existing local communities. • Older person accommodation. • Self-build sites. 	<p>Travelling Showpeople). It is anticipated that Bromley's traveller need will be met through allocated sites in the new Local Plan.</p> <p>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.</p> <p>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 Council will seek to strengthen existing policy requirements for tall buildings, including views of local importance, to enable more robust assessments of tall buildings. Definition, location, and design requirements will be informed by the Bromley Tall Building Strategy and London Plan 2021 policy D9.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Develop a small sites strategy similar to Lewisham's and high-density mid-rise construction. • Large smart housing development not necessarily the best option, there are too many four / five-bedroom homes under occupied which could be converted to flats. • Social housing (including family homes) is seen to be a priority on small sites and infill sites including flatted development. Social housing for existing residents should be a main focus. • Housing with communal meeting areas for residents (inside and outside) would be beneficial. • Modular homes on existing car parks. • Houses in multiple occupation. • The redevelopment of non-conforming employment uses in residential areas, unused office blocks or retail parks. • The incorporation of adequate amenity space (that could be protected) is of importance in new housing developments. • Incorporate solar within new housing developments. 	

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Relaxation of low impact green belt sites to provide medium to large sites with the aim of providing low to middle income housing including affordable housing. • To meet housing need there will be a need to think more creatively about identifying larger sites. For example, an expansion to the edge of the current developed area of the borough. 	
Site-specific design parameters	<p>A large number of respondents were in favour of the Council setting out site specific design parameters to put in place detailed guidance and utilise tools such as design codes for new housing. A number of suggestions were made for inclusion within detailed guidance in addition to general viewpoints on the value of guidance:</p> <ul style="list-style-type: none"> • It is a sensible approach, and it is important to take account of residents' needs. • Incorporate green credentials, animal/insect homes and comfort through nature friendly approaches to development. Importance of guidance on quality developments, density, height 	<p>The Council will allocate sites for the development of particular uses, to assist with meeting identified development needs. 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.</p> <p>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.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>(some heights specified including up to three storeys), space standards, amenity space landscaping, fire prevention and sustainability factors.</p> <ul style="list-style-type: none"> • Can assist with new build being in keeping with existing fabric, compatibility with existing layouts, heritage, character, distinctiveness and sense of community. • There is need for input in relation to social housing developments. • Need for innovative approach to design in addition to flexibility of design parameters. • Importance of maintaining standards within Conservation Areas and ASRCs. • There is a need for stricter design codes in addition to keeping distinct types of houses together. • The guidance needs to be people focused and developed through having genuine dialogue with the community. • Guidance would be preferable to the current focus on housing numbers. • Guidance could assist people less well-off to live in decent homes. • Guidance could include the need to reduce the loss of green space or could be drafted only for protected land. 	<p>Other Local Plan policies which will provide guidance and standards on issues such as open space, amenity space, biodiversity, Conservation Areas and ASRCs and how waste should be dealt with in new development.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • The Council should follow best practice standards in relation to accessible design. • Guidance should be in accordance with the Greater London Authority. • Reference is made to Town and Country Planning Association healthy homes principles. • Use of Building Information Modelling within guidance is advisable. • Such guidance is useful for town centres and areas adjoining them. • Guidance based on SPD feedback (Bromley and Orpington) would be beneficial. • Guidance could speed up the determination of high-quality schemes. • Guidance on waste management for large scale developments would be useful. • Reference is made to a number of other local authorities in the country who have detailed design guidance on noise, sustainability, energy, carbon reduction. • Guidance is only useful if it is complied with or in consultation with developers. 	

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • There is a risk of inappropriate development if guidance is not implemented. • Need to also enforce Building Regulations fully. • Guidance is important as Bromley and the surrounding area has been built up, destroying the area. Lots of ugly flats are discouraged. • The Council could draw on advice from when the Glades was built 30 years ago. <p>A small number of respondents disagreed with the need for design guidance. The reasoning behind this included:</p> <ul style="list-style-type: none"> • The need for a more innovative approach and flexibility. • There is enough guidance already locally. • There is enough regulation on design already. • Guidance could focus unhelpfully on aesthetics and hinder development. • The guidance would need to be keep being updated. 	

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> General advice of two-to-four-bedroom houses of good architectural design would be sufficient. 	
Affordable Housing tenure priorities	<p>Many respondents consider the delivery of affordable housing to be important. There were a small number of respondents that considered that affordable housing delivery was not important.</p> <p>In terms of tenure, the majority of people considered that social rented accommodation should be prioritised, but low-cost home ownership delivery was also considered to be a priority for some respondents. Other respondents thought that both tenures should be prioritised for houses and flatted developments. There were a large number of views and ideas expressed in relation to affordable housing delivery follows:</p> <ul style="list-style-type: none"> All housing should be affordable to allow for allocation to those in need. Provision of affordable housing is the most pressing issue we have, and London has a huge affordable housing problem. There was concern that young people will not be 	<p>The Strategic Housing Market Assessment (SHMA) has been commissioned to update the previous 2014 South East London SHMA. The assessment will examine the overall need, size, type and tenure of housing needed for different groups (including older people, students, essential local workers and HMOs) 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.</p> <p>The preferred policy direction for affordable housing includes following 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 (including looking at affordable housing contributions from smaller sites)</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>able to stay in the borough due to unaffordable prices and</p> <ul style="list-style-type: none"> • there needs to be appropriate housing for first time buyers and key workers. • Tackling homelessness in the borough is important. • Deliver what is required to reduce the cost of temporary accommodation in the borough. • Key to keeping communities and cultures alive in Bromley. • Need to build more Council housing (including looking at the Vienna model). • Concern that affordable housing is not affordable generally and there needs to be a review of the housing cap in light of unaffordable prices. • There is a need for more social rented housing in light of Right to Buy impact. • Ensure affordable properties are rotated once larger units are not required (i.e. family size decreases). • Tenures need to be protected in the long term. • Concern that low-cost home ownership does not exist and need for effective criteria. 	<p>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.</p> <p>The Council's Housing Strategy (2019 – 2029) sets out how the Council will explore opportunities to provide affordable housing on Council land in addition to managing the homes for the Council. This could help ensure high quality homes, security of tenure and excellent tenancy management standards.</p> <p>The Council will seek to engage with relevant stakeholders involved in affordable housing delivery, including RPs where relevant.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Importance of family affordable accommodation. • There need to be more affordable options for renters. • Developers often find viability reasons to not provide affordable housing. Need therefore to provide social infrastructure up front. • High interest rates have had an impact on provision. • There needs to be meaningful consultation with occupiers and their support networks. • Delivering affordable housing should not be at the expense of town centres or open spaces. • Deliver more affordable housing in Penge. • Release of Green Belt should be considered for low-cost home ownership and First Homes. • Concern relating to communal repair bills for affordable housing. • Good management and appropriate locations are important (i.e. near to stations). Concern that affordable housing standard is not currently acceptable. 	

Themes and Policies	Main Feedback Received	Our Response
Affordable Housing on small sites	<p>The majority of respondents thought that it would be beneficial to investigate the potential for seeking affordable housing delivery on small sites. Some respondents expressed an opinion on the suggestion in addition to some ideas to help facilitate it as follows:</p> <ul style="list-style-type: none"> • Preserve large houses and prevent conversions and demolition. • Importance of being genuinely affordable. • Have a mix of housing where possible but not houses in multiple occupation. • Good idea for tackling homelessness. • Use vacant sites and properties. • Sensible compared to large estates and developments. • Small blocks are more manageable and harmonious. • Ensure it is cost effective. • 20% of all housing sites should be for affordable housing. • A good idea where there are already existing buildings. • Use for essential workers, single people and starter homes. • Encourage local firms to participate and offer opportunities for self-build. 	<p>The potential for the delivery of affordable housing from small sites will be robustly investigated in the Local Plan viability study. This would look at the potential for affordable housing financial contributions from smaller sites (i.e. sites providing less than 10 net units). If viable, these financial contributions would be used to provide affordable housing units (including social rented housing) on other suitable sites, allowing for increased provision of affordable housing compared to the current adopted Local Plan approach.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Could assist in developing community clusters. • Acceptable if low rise with no adverse impact on residential amenity or overcrowding. • There were differing views on whether affordable homes on small sites should be accommodated in town centres. Less planning regulations could assist the process. • Legal agreement would be time consuming. • Think about converting large shipping containers and use small dwellings. <p>There were some respondents that did not think it would be beneficial due to viability reasons and the impact it might have on parking issues and flooding. Some identified it is not supported by the NPPF. A small number of people were unsure whether it would be advantageous.</p>	
Housing size	In terms of housing size for new homes there was a varied response including a large number of respondents feeling that one-to-	A Strategic Housing Market Assessment (SHMA) has been commissioned to update the previous 2014 South East London SHMA. The assessment will examine the overall need,

Themes and Policies	Main Feedback Received	Our Response
	<p>two-bedroom flats and two-three-bedroom houses are priority.</p> <p>There was general feeling that small starter homes or a mix of unit sizes with amenity space would be beneficial and could assist first time buyers.</p> <p>In terms of occupancy, respondents highlighted the need for accommodation for younger people, families and also older people. There was also a preference for not providing studio units (although can be useful for older, vulnerable and single people) or large five-bedroom homes.</p> <p>In some cases, it was considered that town centre schemes can restrict unit types to flatted development (1–3-bedroom flats) and don't allow for the accommodation of houses.</p> <p>Other respondents highlighted the need for decent quality accommodation and ensuring that the appropriate evidence base informed housing need in terms of unit sizes. Flexibility in terms of unit size provision was also highlighted in line with 2021 London Plan.</p>	<p>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 housing size mix.</p> <p>Developments will be required to follow a design-led approach for new dwellings ensure dwellings are of a high quality and deliver a range of dwelling sizes.</p>

Themes and Policies	Main Feedback Received	Our Response
Types of housing	<p>A number of respondents highlighted the need for the prioritisation of older people housing to assist in releasing family homes into the market. This includes a policy for older people accommodation that also considers how affordable housing contributions and viability are considered). There was also support for the 2021 London Plan benchmark targets for older person accommodation.</p> <p>There was a range of responses in terms of other prioritisations including the following:</p> <ul style="list-style-type: none"> • Houses in multiple occupation (including those managed by the Council). • Students. • Homes for Service Families. • Temporary accommodation. • Safe accommodation for asylum seekers. • Modular homes. • Accommodation for people with learning difficulties. • Accessible accommodation. • Traveller accommodation. • Build to rent accommodation (can ease pressure on other housing types including 	<p>The Strategic Housing Market Assessment (SHMA) will assess different housing needs in the borough. This includes different groups including; older people, students, service families, and people with learning difficulties. This evidence base will help inform draft policies for the new Local Plan, including specialist and older person accommodation</p> <p>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. The new Local Plan will also include a specific policy on houses in multiple occupation (HMOs). 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.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>private rented sector, HMOs and student housing).</p> <ul style="list-style-type: none"> Narrow boats. 	<p>A London-wide Gypsy and Traveller Accommodation Needs Assessment is currently being undertaken by the GLA 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.</p>
Other Responses	<p>Respondents also raised the following points on the topic of housing:</p> <ul style="list-style-type: none"> Ensure housing requirement and plan period are clear. Poor delivery of affordable housing to date. Ensure no net loss of affordable housing in accordance with 2021 London Plan. Consider a threshold of twenty-five units for affordable housing sites. Implement a 50% threshold for affordable housing on relevant sites. Consider difference in build to rent model when looking at affordable housing viability. Assess viability for older person accommodation. 	<p>The relevant housing requirement target and Local Plan period will be clearly set out in the new Local Plan. It also referenced in the Direction of Travel consultation document. The affordable housing policy will seek to increase affordable dwellings in the borough in line with the SHMA evidence base and the Local Plan Viability Study. The policy will be based on the 2021 London Plan threshold approach. The Local Plan Viability Study will also consider the viability of other components of housing supply.</p> <p>The Council will continue to engage with relevant groups and bodies, including relevant consultation bodies through the Duty to Cooperate process as the new Local Plan progresses. The Local Plan will follow the</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Take positive approach to meeting cross boundary housing needs and continue Duty to Co-operate with other relevant local authorities. • The GLA support references to 2021 London Plan housing targets, small sites and design guidance. Reference should be made to the 50% affordable housing threshold set out in London Plan for public land and other relevant sites. • Adopt London Plan 35% affordable housing threshold approach. • Housing target should be increased above London Plan housing requirement figure for Bromley. • Small sites reliance failed in current Plan. There is a need to make the most efficient use of strategic housing sites. • Green Belt sites could assist regeneration in Renewal Areas. • Need for a masterplan for housing delivery. • Need for Health Impact Assessments for large scale developments. • Infrastructure and public transport should be made available to existing housing areas that are not adequately resourced. 	<p>threshold approach to affordable housing as set out in the London Plan 2021.</p> <p>The new Local Plan will include reference to an up-to-date housing trajectory that will take into account past completions in the borough. A range of large and small sites (including site allocations) will be identified for housing and mixed-use purposes to meet the relevant housing requirement target for the borough. Brownfield sites will be prioritised.</p> <p>The Direction of Travel consultation document highlights that 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.</p> <p>Social housing rent controls are not regulated through Planning legislation. Affordable housing rents are sometimes referenced, where relevant, in S016 agreements.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Concern regarding parking provision in Orpington Town Centre. • Include reference to how funds received for town centres are ringfenced for the benefit of the town centres. • Need to consider additional protected views and ASRCs. • Importance of social housing rent controls. In addition to this assistance for landlords to prevent units being sold and creating additional problems for the Council. 	

4.4 Employment, Retail and Leisure

4.4.1 139 comments were received relating to employment, retail and leisure. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Strategic priority areas for economic growth	<p>Existing strategic policy areas should be protected; however, there should be flexibility to allow sites to react to changing market conditions.</p> <p>Other areas with good growth potential should also be considered as a focus for economic growth.</p> <p>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.</p>	<p>The new Local Plan will continue to focus on specific strategic employment areas informed by updated employment evidence. SILs and LSISs will continue to be the focus for new and intensified industrial floorspace and office uses will continue to be prioritised in town centre locations.</p> <p>However, the new Local Plan will also allow for flexibility where circumstances change; this could include detailed policy criteria to prevent the loss of employment floorspace, including strengthened marketing requirements with the length of marketing tailored to respective designations.</p> <p>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</p>

Themes and Policies	Main Feedback Received	Our Response
		Council will explore a specific policy for the airport, continuing the broad thrust of the current Local Plan policies 103 to 108.
Industrial and Commercial Designations	<p>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.</p> <p>A number of responses consider that the existing designations for industrial and commercial uses give sufficient protections, and many consider that they should remain protected. However, the majority that commented on these designations suggest that the protections should be relaxed to allow for alternative uses.</p> <p>Most responses that suggested an alternative use suggested residential, however there were also some responses that were against developing the sites for residential.</p>	The new Local Plan will include flexibility to allow for change of use of industrial and commercial sites in certain circumstances.
Planning for Employment	Bromley should plan for a wide range of employment uses. In particular, office, retail, affordable and flexible workspace, flexible	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.

Themes and Policies	Main Feedback Received	Our Response
	<p>working and working from home were seen as key areas to plan for.</p> <p>Employment sites should provide high quality modern floorspace, as outdated floorspace can constrain growth. Strong energy efficiency credentials are important.</p> <p>Need to provide sufficient and cheap parking to attract businesses. There should be electric charging points at places of work. Need to make improvements to public transport and invest in sustainable transport.</p> <p>Need to invest in public realm in both industrial areas and town centres.</p>	<p>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.</p> <p>The new Local Plan will include parking standards for commercial uses.</p> <p>Investment in public realm and public transport is not a planning matter, but the new Local Plan will include policies relating to new public realm and measures relating to improving access to public transport.</p>
Other responses	<p>Rents and business rates need addressing.</p> <p>Housing developments and mixed-use developments should use local skills and local trades people. They should have retail units, community space and other public uses on</p>	<p>Business rates are not a planning matter. Consideration of rental rates of new commercial floorspace can be considered as part of consideration of new policy on affordable workspace.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>lower floors, and include services to support housing.</p> <p>The borough should build skills and promote apprenticeships.</p> <p>Work experience opportunities should be offered to local schools and there should be apprenticeships and more training opportunities.</p>	
Existing Town Centres	<p>The existing town centres need to be more attractive, accessible and more pedestrian friendly, such as including tree planting and green spaces.</p> <p>Some town centres feel run down and unsafe.</p> <p>Air pollution in town centres needs addressing.</p> <p>There is a lack of public toilets, public seating and visual policing.</p> <p>Maintain the protection of public houses as these are a significant source of employment.</p>	<p>The new Local Plan will incorporate six overarching design principles from the Urban Design Guide SPD which will 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. The design and heritage policies will 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. They will also address public realm.</p>

Themes and Policies	Main Feedback Received	Our Response
		<p>The new Local Plan will continue with the town centre first approach to support existing town centres. The Council has also adopted two town centre SPDs (Orpington SPD in July 2023 & Bromley Town Centre SPD in October 2023). These SPDs help guide developments within the town centre and implement current adopted policies. Bromley Town Centre is a focus for sustainable growth of retail, office, homes, and leisure and cultural activities. The Orpington Town Centre SPD highlights the vision for Orpington to be a thriving Major centre with a strong social, leisure, retail, education, culture and heritage offer, supporting the health and wellbeing of the south-eastern area of the Borough. It will complement the role of Bromley Metropolitan Town Centre providing a lively centre addressing a range of the needs of surrounding communities</p> <p>The sustainability policies will require development to mitigate the impact of pollution, including air and noise.</p>

Themes and Policies	Main Feedback Received	Our Response
		<p>The Local Plan cannot address police services, but designing out crime is referenced in the Council's Urban Design Guide SPD.</p> <p>The new Local Plan will continue to support community facilities, and any losses will be resisted without replacement. It will have regard to London Plan Policy S6 which addresses public toilets in major developments.</p> <p>The new Local Plan will continue to protect public houses because of their important social and economic value.</p>
Diversifying Town Centres	<p>Town centres need activities for people of all ages.</p> <p>Leisure uses and community focussed activities/community facilities should be supported.</p> <p>There is support for small independent shops and larger retailers.</p> <p>There is support for diversifying town centres subject to appropriate controls being in place.</p>	<p>The new Local Plan will encourage a diverse offer of main town centre uses, community uses and cultural uses and complementary residential development.</p> <p>The Retail and Leisure Study sets set out floorspace requirements and projections over the plan period. The study will provide the evidence base to inform the town centre policies, designations and allocations. The study includes consideration of leisure uses and nighttime economy.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>There is support for residential use in town centres subject to appropriate infrastructure being in place to support it, however concerns are also raised regarding the compatibility with other uses.</p>	
Other Responses	<p>Respondents also raised the following points on the topic of Employment, Retail and Leisure:</p> <ul style="list-style-type: none"> • Concerns raised over number of fast-food shops/charity shops and vacant units • High quality design of new development in town centres is important. • Historic buildings should be protected. • High rise should be avoided. • Safety in and around town centres should be improved. • Town centres need sports and leisure and other facilities for people of all ages • Need more outdoor activities and green spaces • A suggestion for more nighttime venues that aren't clubs and pubs • A few responses suggest the pedestrianisation of highstreets • Some concerns raised regarding the night time economy but also some support for it subject to appropriate controls in place (around policing/noise). 	<p>The Council will continue to monitor town centre vitality and viability and the number of vacant premises within town centres. The new Local Plan will encourage the meanwhile use of vacant units.</p> <p>The new Local Plan will look at limiting the impacts of potentially harmful uses such as takeaways, particularly where the proposal would result in the overconcentration of such uses.</p> <p>The Tall Building Strategy will look at the suitability of tall buildings in town centres alongside policies that ensure high quality design and the six overarching design principles. The design and heritage policies will continue to protect historic buildings.</p> <p>The Local Plan cannot deliver pedestrianisation projects in town centres.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> Visitor accommodation – consider allowing hotels near sporting hubs. 	<p>However, the Local Plan will look at improving conditions for walking where appropriate.</p> <p>The Retail and Leisure Study includes consideration of leisure uses and nighttime economy. The new Local Plan will recognise the role of restaurants, cafés, pubs whilst managing any potential negative impacts.</p> <p>The new Local Plan will continue a policy to support new visitor accommodation in town centre locations.</p>

4.5 Design and Heritage

4.5.1 151 comments were received relating to design and heritage. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Contributions to local character	<p>Respondent raised the following points on local character:</p> <ul style="list-style-type: none"> Architectural styles should reflect the local/specific area – rather than being distinctly different or generic. Not appropriate to establish overly stringent design requirements focusing on a particular architectural style. Important to encourage innovation and contemporary design while still preserving local character and identity – need to avoid pastiche design. Architectural styles should complement rather than clash with existing local character. High quality design is more important than a particular architectural style. Important to encourage sustainable design and use of sustainable building materials. 	<p>The new Local Plan will require development proposals to adopt a design-led approach which takes full account of local character and context.</p> <p>Development proposals will be required to respond to guidance set out in the Council's Urban Design Guide SPD to inform an appropriate architectural response. The new Local Plan will incorporate the six overarching design principles from the Urban Design Guide SPD.</p> <p>The new Local Plan will require development proposals to incorporate sustainable design principles to ensure the efficient use of resources and achieve the highest standards of sustainable design and construction.</p>
Bromley's Historic Environment	Several responses emphasised the importance of protecting the historic	The Council will continue to seek to conserve and enhance the value and significance of

Themes and Policies	Main Feedback Received	Our Response
	<p>environment including protected views. The majority of respondents considered existing protections to be appropriate. A smaller number of respondents stated that there should be more protection of the historic environment. Several responses suggested additional specific ASRC designations.</p> <p>Responses highlighted the need to create a balance between protecting the historic environment and enabling new development. Respondents emphasised the need to take a pragmatic approach (where appropriate) to positive development proposals.</p>	<p>Bromley's historic environment with policies protecting Conservations Areas and their settings, ASRCs, historic parks and landscapes, and designated and non-designated heritage assets. The Council will continue to ensure that designated views of local importance are protected and enhanced.</p> <p>The suggested new ASRC designation will be considered as part of the preparation of the new Local Plan; additional designations would require a strong justification so as to not undermine the value of existing ASRC designations.</p> <p>The new Local Plan will require development proposals to adopt a design-led approach to optimise development potential whilst protecting the historic environment. Development proposals will be required to respond to guidance set out in the Council's Urban Design Guide SPD to inform an appropriate architectural response.</p>
Tall Buildings	Respondents made the following comments on the principle and location of tall buildings:	The new Local Plan will require all tall building development proposals to provide a strong townscape justification taking full account of

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Preference for low-rise developments which are sympathetic to existing local character. • Tall buildings are not appropriate in low-rise areas. • Tall buildings should only be considered in Town Centre locations. <p>Support for tall buildings in Bromley South (Bromley Town Centre) – subject to appropriate design quality.</p> <p>A wider masterplan approach is required to determine the location of tall buildings with more attention given to infrastructure requirements.</p> <p>The Council cannot rely solely on tall buildings to deliver new homes.</p> <p>The Council should identify sites which have the capacity to accommodate tall buildings with appropriate heights determined at planning application stage.</p> <p>Support for a borough-wide characterisation study/assessment to inform potential tall building locations.</p>	<p>local character and context informed by the Council's Characterisation Study.</p> <p>The Council will seek to identify suitable and unsuitable locations for tall buildings as part of a wider Tall Building Strategy informed by the Council's Characterisation Study. The Council will seek to strengthen existing policy requirements to enable more robust assessments of tall building proposals.</p> <p>Tall buildings can help to provide new housing at increased densities but this needs to be balanced against any potential adverse impacts of tall buildings. Housing delivery in Bromley will not be solely dependent upon tall building developments.</p> <p>The new Local Plan will require all development proposals to adopt a design-led approach to optimise development potential whilst responding appropriately to local character and context.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>The Local Plan should identify suitable and unsuitable locations for tall buildings and specify appropriate height parameters.</p> <p>Important to adopt a design-led approach to optimise development potential.</p> <p>Various maximum height parameters suggested (ranging from 5 to 10 storeys).</p>	
Design Codes	<p>Design Codes should reflect wider design objectives and should not prescribe a particular scale/form of development.</p> <p>Design Codes should not be too prescriptive. Design Codes and parameters should not seek to restrict development.</p> <p>The Council should create Design Codes for all areas including town centres.</p> <p>Design Codes should include layout, density, height, accessibility, space standards, materials, and sustainability</p>	<p>The Council will consider the role of Design Codes as part of preparation for the new Local Plan, including the potential scope, type, and parameters. Any potential future Design Codes will be informed by the Council's Characterisation Study.</p>
Policy Design Guidance	<p>Respondents suggested that the following policy areas would benefit from specific design guidance:</p> <ul style="list-style-type: none"> Residential and commercial development 	<p>The Council's Urban Design Guide SPD provides specific guidance on housing design, non-residential (commercial) design, mixed-use development, landscape, public realm,</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Mixed-use development • Development in Town Centres • Landscape/public realm and biodiversity • Sustainability (renewable energy sources) • Car parking • Active design (Sport England) • Shopfront design. 	<p>biodiversity, sustainability, healthy environments, and shopfront design. The six overarching design principles will be incorporated into the new Local Plan.</p> <p>The Council will seek to retain and/or strengthen existing policy requirements for: housing design, landscape and public realm, sustainability, and shopfront design.</p> <p>The Council's Bromley Town Centre SPD and Orpington Town Centre SPD provide guidance on development in town centres.</p> <p>Guidance on car parking will be provided in the Local Plan transport policies.</p>

4.6 Sustainability and Waste

4.6.1 128 comments were received relating to sustainability and waste. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Net Zero and Climate Change	<p>The vast majority of respondents consider that it is very important to support the achievement of 'net zero' and the Local Plan should include measures to tackle climate change.</p> <p>A small minority say that the concept of climate change should not be addressed, considering it to be 'a con'.</p> <p>Some suggest that climate change and net zero should be given more priority and be referenced in the objectives of the Plan. They recommend that it should be integral to other policy areas including protecting and enhancing green spaces, design of buildings and future infrastructure and transport policy.</p> <p>The Environment Agency support Bromley's commitment to reducing carbon emissions and to become a 'direct' carbon net zero organisation, however they consider that the</p>	<p>The new Local Plan will seek to 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. The Local Plan will aim to reduce carbon emissions of new development in the Borough in accordance with the NPPF and the London Plan.</p> <p>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.</p> <p>The potential of development sites ('site allocations in the Plan) will be assessed against a range of criteria including sustainability issues such as flood risk'</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>new Local Plan could go further to tackle climate change.</p> <p>Some landowners and developers highlight sites within the borough which they consider to be sustainable and would provide long term benefits to mitigating and adapting to climate change.</p>	
Sustainable design and construction	<p>There is support for high sustainability standards overall.</p> <p>The building and property sector have concerns about the potential impact on the viability of development if requirements in addition to those in Building Regulations and The London Plan were to be introduced.</p> <p>The principle of retrofitting and refurbishing existing buildings instead of demolition and redevelopment is preferred by some respondents. This could reduce waste, improve the environmental performance of existing buildings and protect local character and heritage.</p>	<p>The new Local Plan will require new development to incorporate sustainable design and construction principles and follow the energy hierarchy.</p> <p>The Council will investigate the potential for a policy to require the achievement of a BREEAM level certification.</p> <p>The retrofitting of existing buildings will be encouraged where feasible, as this could support other policy objectives to reduce waste and improve energy performance.</p> <p>The design and heritage policies in the new Local Plan will also include housing design policy requirements to ensure high quality, healthy and sustainable new homes.</p>

Themes and Policies	Main Feedback Received	Our Response
Air Quality	<p>The majority of respondents do not consider that there is a problem with air quality in the Borough.</p> <p>Those that are concerned about local air quality support measures to reduce adverse impacts from transport.</p>	<p>An Air Quality Management Area has been declared based on monitored pollutants which exceed statutory levels of nitrogen dioxide. The Council has published an Air Quality Action Plan which sets out actions to improve air quality. 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.</p>
Circular Economy	<p>Alternative waste management sites should be considered. There are existing sites which are in inappropriate locations, and which cause local amenity and traffic problems.</p> <p>Waste management facilities should be enclosed where possible</p> <p>A local authority outside London supports the collaboration of the South East London Waste Group but suggests that a waste capacity assessment should be done for the Borough.</p> <p>There are issues with litter and fly-tipping which should be better managed</p>	<p>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.</p> <p>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. 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</p>

Themes and Policies	Main Feedback Received	Our Response
		<p>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.</p> <p>The Local Plan cannot address fly tipping or litter but will maintain policies on managing waste in new developments.</p>

Themes and Policies	Main Feedback Received	Our Response
Other Responses	<p>Respondents also raised the following points on the topic of Sustainability and Waste:</p> <ul style="list-style-type: none"> • Links should be made to the importance of retaining and enhancing green infrastructure and the role it plays in the mitigation of and adaptation to climate change. • Renewable energy infrastructure such as solar panels should be included in new development. • Safe routes for walking and cycling should be prioritised and improvements made to public transport. • Electric vehicle infrastructure should be integrated into new development. • New development should be restricted because of the strain on water supplies. • New development should contribute to the maintenance and capacity of the water supply and sewerage networks. • The Strategic Flood Risk Assessment must be updated • Local Plan policies on the water environment should be strengthened to include specific support for the improvement of river corridors and areas near main rivers, floodplain storage, finished floor levels and clearer guidance on sustainable drainage. 	<p>The new Local Plan will support the inclusion of renewable infrastructure in line with the energy hierarchy.</p> <p>The new Local Plan will Incorporate sustainable design and construction principles, including a requirement to attain BREEAM standards, setting standards for water use in new development</p> <p>The plan will include policy to ensure that new development assesses its impact on the capacity of water supply and wastewater networks.</p> <p>An update of the SFRA is being commissioned to inform the plan, site allocations and provide guidance to developers.</p> <p>The current policy for safeguarding sites and assessing new proposals will be taken forward. This assures that viable deposits continue to be protected, the impact of any new development is fully considered and plans for restoration are included as part of the application.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> • Policies could be extended to secure the improvement of the water environment and water quality. Groundwater and land contamination should inform the allocation of any sites proposed for development in the Local Plan. • Areas of the Borough with viable mineral deposits (aggregates) should be safeguarded 	

4.7 Green Infrastructure, Open Space and Biodiversity

4.7.1 152 comments were received relating to green infrastructure, open space and biodiversity. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Green Belt & Metropolitan Open Land	<p>Green Belt and MOL should continue to be strongly protected. 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.</p> <p>Green Belt and MOL protections should be maintained, not only to protect the environmental value of green spaces but also to avoid building development in areas that are poorly connected and will give residents, or those that need to use the development, few options to travel by active travel or public transport.</p> <p>Some respondents argued the Green Belt should be reviewed. Where it is assessed to be poor quality, unused or neglected they should be considered for new housing development.</p> <p>Whilst the Green Belt is broadly supported, some respondents felt there must be a</p>	<p>The Council will continue to strongly protect Green Belt, Metropolitan Open Land and Urban Open Spaces through Local Plan policies.</p> <p>As required the National Planning Policy Framework (NPPF), the Council is undertaking a review of its Green Belt, as well as 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.</p> <p>It will also consider the implication of the introduction of 'grey belt' in the NPPF. 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).</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>consideration of planning balance and the need to supply additional homes and high-quality facilities. There are exceptional circumstances where it is justified for boundaries to be altered.</p> <p>There could be some relaxation to the Green Belt, particularly golf courses and farmland, to facilitate housing.</p>	
Biodiversity Net Gain	<p>The Council should include the BNG requirement of 10% in the Local Plan. BNG could be set for different parts of the Borough.</p> <p>Developers should be required to demonstrate a BNG. Both commercial and residential properties should be required to demonstrate that they have included any features required via a planning approval. BNG uplift must be in place before development starts.</p> <p>All current public green space should have a management plan that provides a BNG.</p> <p>Provision should be made for where gain cannot be made on site e.g. delivering BNG offsite. BNG could include requirements to plant trees in all developments.</p>	The new Local Plan will reflect the statutory BNG requirement, informed by the best available ecological information and addressed from the start of the development process.

Themes and Policies	Main Feedback Received	Our Response
Urban Greening Factor Score	<p>Introducing an Urban Greening Factor Score in line with the London Plan is supported.</p> <p>Particular consideration to urban greening is required in renewal areas and those facing significant disadvantage.</p> <p>Any major development should conduct an Urban Greening Factor assessment in accordance with the methodology set out in the London Plan.</p>	<p>The new Local Plan will set out an Urban Greening Factor Score (UGF) as set out in the London Plan.</p>
Species and Habitats	<p>Safe habitats are needed for wildlife.</p> <p>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.</p> <p>Developers should make promises to benefit the local area through biodiversity with their new build projects.</p> <p>Strengthen requirements to protect existing wildlife and provide new habitats in all new build developments.</p> <p>Stronger policies on trees are required to protect existing trees as well as planting new</p>	<p>Sites with biodiversity value, including designated SSSIs and SINC, will continue to be afforded strong protection. The Council will seek to designate new and upgraded SINC in line with the recommendations of the SINC review.</p> <p>Trees make an important contribution to the character and quality of urban environments and the Local Plan will continue to include policies to manage new and existing trees.</p>

Themes and Policies	Main Feedback Received	Our Response
	ones. A requirement to plant additional trees in any development possible.	
Other Responses	<p>Respondents also raised the following points on the topic of Green Infrastructure, Open Space and Biodiversity:</p> <ul style="list-style-type: none"> • No-Mow May, waterways etc should all be included in new developments. • Natural ponds are vital to the development of a wide range of biodiversity. • Any development proposals on sites of vital habitats for biodiversity should be prohibited. • Developers must ensure environment assessments are carried out with the Council and credible ecology experts. • New developments should include roof gardens • Allow indigenous trees, shrubs and meadows in many areas rather than mowing everywhere. • Continue opening up water courses. 	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 areas where access to open space and nature should be prioritised.

4.8 Social and Strategic Infrastructure

4.8.1 110 comments were received relating to social and strategic infrastructure. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Infrastructure challenges & opportunities	<p>The key infrastructure challenge raised by responses related to the need to protect and enhance social infrastructure to support the health and wellbeing of the population and the resilience of communities, noting existing inequalities across the Borough.</p> <p>Support was evident for a wide range of infrastructure, and concerns were raised about the pressure on existing social and strategic infrastructure and how to ensure adequate infrastructure going forward alongside new residential development. These concerns were raised by residents, community & civic groups, residents associations and adjoining authorities (Bexley Council & Surrey Council Council) with regards to a range of social infrastructure, notably:</p> <ul style="list-style-type: none"> • Health (physical and mental health provision, GP's, dentists); • education (including Further Education); • community; 	<p>The Council will maintain the broad policy approach in the existing plan to enhance the range of social infrastructure and resist loss.</p> <p>The Council will continue to promote improved health and wellbeing across the Borough, including through embedding the 'healthy' design principle from the Urban Design Guide SPD.</p> <p>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 as set out in the draft Infrastructure Delivery Plan. This includes working with the NHS, utility companies and the Council's School Place Planning team.</p> <p>The Playing Pitch and Outdoor Sports Supply and Demand Report will provide analysis of playing pitches in the Borough, across a range of sports. The Bromley Indoor Built Sports</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> recreational, including a range of sports both indoor and outdoor (highlighted by Sport England) and children's play facilities; parks and other green infrastructure; policing utilities; cultural infrastructure such as libraries, public houses, theatres and performance and art venues. <p>In respect of strategic infrastructure specific concern raised about the ability of the sewerage system to function effectively and the inadequate coverage of broadband. With regards to energy infrastructure, a suggestion for community scale battery storage facilities linked to the National Grid to enable the smoothing out of peak demand, whilst redundant gas holders were highlighted as offering a redevelopment opportunity.</p>	<p>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.</p> <p>The Council will continue to protect public houses.</p>
Infrastructure deficiency	The majority of responses related to enhancing the wide range of infrastructure across the Borough. A number of responses highlighted the need to undertake specific area assessments of infrastructure needs, and several responses referred to specific areas as	The new Local Plan will ensure the appropriate provision of social and strategic infrastructure through provision of new social infrastructure in suitable locations. The Council will, where appropriate, seek community use agreements

Themes and Policies	Main Feedback Received	Our Response
	<p>having particular deficiencies and / or potential in respect of social infrastructure namely:</p> <ul style="list-style-type: none"> • Biggin Hill & Keston highlighted as having limited social infrastructure, with Biggin Hill further disadvantage by limited public transport • Penge lacking amenities with specific reference to pressures on health facilities and children's services and the distance to hospital services, • Clock House ward lacking pharmacy provision • Orpington improved social infrastructure, notably (but not exclusively) sporting enhancements, specifically linked to the potential regeneration focussed on the Walnuts leisure and shopping centre and adjacent buildings. The loss of the bowling alley also specifically referenced, • Bromley Town should enhance its social infrastructure offer (cultural - music venues & art galleries and specialist education), • Beckenham Town Centre should expand cultural activities, • A20 needing enhanced active travel crossings, • lack of high-speed Wi-Fi (area not stated), 	<p>to secure public use of privately operated social infrastructure.</p> <p>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 as set out in the draft Infrastructure Delivery Plan.</p> <p>Social infrastructure will be steered towards accessible locations, town centres and neighbourhood centres and local parades, unless responding to a specific localised need.</p> <p>Where there is insufficient energy, water or digital infrastructure the Local Plan will require necessary infrastructure as part of any development and all major development proposals will be required to carry out early pre-application engagement with infrastructure providers to demonstrate that there is sufficient infrastructure capacity to support the proposed development from commencement.</p>

Themes and Policies	Main Feedback Received	Our Response
	<ul style="list-style-type: none"> the need for accessible, safe and clean toilets in developments and generally across the Borough to enable people to feel comfortable the need for neighbourhood policing facilities across the Borough as approaches to policing evolve. specific requests to expand 2 existing education allocations to enhance provision. <p>Two representations proposed the enhancement of existing Bromley based sports provision on protected open space supported by ‘enabling’ residential development).</p> <p>Four representations were submitted involving proposals for residential developments various Green Belt locations incorporating elements of new supporting social infrastructure.</p>	<p>The provision of specific types of social or strategic infrastructure will be considered through the site allocation process, including the allocation of sites for new or expanded educational facilities where necessary.</p>
Policy requirements for new development	<p>There was a strong view that new development should be accompanied by appropriate social and strategic infrastructure and that such infrastructure should be high quality, designed for accessibility, safe and secure (specific</p>	<p>The new Local Plan will include overarching design principles which seek high quality design.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>reference to parks and train stations, designed to support social inclusivity (young, elderly and those marginalised by disability or other factors), and reflect ‘Active Design’ principles to support health and wellbeing.</p> <p>It was felt that infrastructure should be designed into developments to avoid overstressing existing provision. Specific suggested policy requirements for the new infrastructure included design and siting to have regard to character of existing area, height and density, the use of repurposed Town Centre units, detail as to how infrastructure provided as part of Build to Rent is managed and / or made available, and minimising the visibility of telephony masts through siting, design and colour.</p> <p>NHS property specifically sought flexibility in policies relating to health estates.</p> <p>Specific requests were made in relation to the seeking of Planning Obligations for education (Dept for Education), policing (Met Police), transport infrastructure (Network Rail) and health (HUDU).</p>	<p>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.</p> <p>The Council will continue the approach of allowing the temporary use of vacant buildings as ‘meanwhile’ community uses and of seeking community use agreements to secure public use of privately operated social infrastructure.</p> <p>The new Local Plan will include requirements for digital infrastructure design and siting.</p> <p>The new Local Plan will continue to resist the loss of social infrastructure, and the Council will continue to work with NHS partners during the preparation of the Local Plan and the Infrastructure Delivery Plan to understand healthcare facility needs.</p>

Themes and Policies	Main Feedback Received	Our Response
Other Responses	<p>Respondents also raised the following points on the topic of Social and Strategic Infrastructure:</p> <ul style="list-style-type: none"> • A number of other matters were raised relating to matters within the current Local Plan '<i>Supporting Communities</i>' Chapter. Notably, acknowledgement of the contribution of all environments and buildings (not just those providing social infrastructure) to the delivery healthy, accessible, inclusive and resilient communities, and to address inequalities between communities. • The link between social infrastructure and the health and wellbeing of the population was highlighted in numerous responses where the cross over between social infrastructure and other areas of the plan is apparent, these include representations relating to active travel infrastructure (walking cycling & public transport), the importance of access to green infrastructure and other environments for insects (pollinators), including green walls, and trees, the health and wellbeing implications for communities of mitigating climate change, ensuring air quality and adopting a green growth approach, the value of a range of town centre and nighttime social infrastructure uses, and 	<p>In order to ensure sustainable and resilient communities across the borough, in addition to seeking to ensure the appropriate provision of social infrastructure the Council has identified six overarching principles contextual, responsive, connected, inclusive, healthy and sustainable, which represent the key characteristics of successful well-designed places.</p> <p>The proposed overarching principles acknowledge key characteristics and the connecting the various elements of the plan, notably the 'healthy' principle. The new Local Plan will seek to improve the resilience of buildings and communities to cope with a changing climate.</p> <p>The Council will ensure the protection of strategic infrastructure as well as additional provision to meet the infrastructure needs of the community over the Local Plan period.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>the health & wellbeing implications ensuring housing for young people and of the support provided through specialist accommodation.</p> <ul style="list-style-type: none"> • Other matters raised include representations seeking a comprehensive and co-ordinated approach to new development respecting existing site constraints including utilities situated within sites (sought by National Grid Electricity Transmission & National Gas Transmission), and appropriate community/youth workers to support social infrastructure facilities. 	

4.9 Transport and Public Realm

4.9.1 109 comments were received relating to transport and public realm. The main feedback received, and the Council's response is summarised below.

Themes and Policies	Main Feedback Received	Our Response
Sustainable Transport	<p>There are excessive levels of car dependency in the borough, and sustainable transport infrastructure is currently inadequate and needs to be addressed alongside more electric vehicle charging points for existing private vehicles.</p> <p>Transport for London (TfL) on behalf of the Mayor of London, reiterated that policies need to help achieve targets set out in the London Plan. It should also provide protection for transport projects and operational transport infrastructure in line with projects listed in Policy T3 and Table 10.1.</p> <p>TfL's aspirational cycle route network that reflects TfL's Strategic Cycling Analysis should be included in the Local Plan.</p> <p>Any local exceptions to residential car parking standards for small sites in PTAL 0 - 1 should be clearly justified with robust evidence and</p>	<p>The Council will explore the potential for increasing the requirement for active electric vehicle charging points.</p> <p>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.</p> <p>All transport modes have a role to play in improving access for local residents. Sustainable transport modes (walking, cycling, public transport) will be prioritised, but there will also be instances where development needs to plan for access by car.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>mitigations identified where there is potential for adverse impacts.</p> <p>There should be a stronger focus on improving/increasing the cycle network and cycling safety.</p> <p>Car free developments should be encouraged and prioritised.</p> <p>Cars are useful to residents. There is some reluctance to switch to electric cars, which would reduce if there were more electric charging points. Bromley does not enjoy the same public transport advantage as Inner London.</p> <p>The Local Plan must reduce the need to travel by locating development in sustainable locations and where new social infrastructure can be provided within walking distance of new and existing dwellings. Modes such as walking, cycling and public transit reduces reliance on private vehicles, alleviating traffic congestion and decreasing carbon emissions.</p> <p>The Local Plan should prioritise development sites which are well-connected by existing or planned public transport. Improvements along</p>	<p>The new Local Plan will ensure that the transport relates impacts of development proposals can be properly assessed, including detailed requirements for transport assessments for certain applications.</p> <p>The transport policies will ensure accessibility across a range of transport modes, including walking.</p> <p>Policy will ensure the reduction of road congestion and encourage patterns of development that ensure good access to public transport and are safe for pedestrians and cyclists.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>Bromley Common would provide significant sustainable transportation benefits. Green spaces, and walking routes within these, should be considered as part of active travel networks. 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 active travel.</p> <p>Active travel should be promoted. Proposals that meet the strategic target of 80% of all trips to be made by foot, cycle or public transport will be supported.</p> <p>National Highways raised concerns about the impact of development proposals on the safe and efficient operation of the SRN (A20). No transport evidence base has been provided to support the Local Plan to assess the impact on the capacity of the SRN. A transport evidence base should be provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation.</p> <p>People need incentives to be encouraged to use public transport as it is considered inferior to car use. Make walking and cycling preferred</p>	

Themes and Policies	Main Feedback Received	Our Response
	<p>method of transport. Give up road space to accommodate this.</p> <p>Getting the right balance between all transport modes. Too much priority is currently given to cyclists. Alternatively, separate cyclists better from other transport modes.</p> <p>Transport needs to be more accessible for disabled and elderly people. Parking restrictions should be carefully considered in regard to disabled/elderly car users.</p>	
Public Transport	<p>There should be a focus on introducing additional public transport such as Trams, DLR or Underground to Bromley.</p> <p>There is a need for improved and cheaper public transportation, particularly in the more rural areas of the Borough.</p> <p>Many respondents in rural areas were concerned that buses were too big, and smaller buses should be used for these routes. Sunday provision should be reviewed and increased.</p> <p>Many respondents felt that stronger focus was needed on the provision of bus services in</p>	<p>The Council is keen to ensure that all transport modes have a role to play in improving access for residents.</p> <p>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.</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>Bromley; with increased frequency and more routes being particularly important.</p> <p>There is a lack of connection between the north and south of the Borough. Public transport in the south of the Borough needs to be greatly improved.</p> <p>Accessible buses along school routes should be introduced and improved to discourage school runs.</p> <p>It is important to work with transport providers to maximise public transport usage and connectivity. Connectivity via a range of modes of transport is integral to promoting sustainable development.</p>	
Public Realm	<p>Many respondents support the delivery of high-quality public realm and would like it to include art features and high-quality paving materials.</p> <p>Public realm should be encouraged in all appropriate developments and the benefits should be fully considered in any planning application. Walking should be encouraged</p>	<p>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.</p> <p>The Infrastructure Delivery Plan (IDP) includes a section related to heritage and public realm, which will support policies that seek to</p>

Themes and Policies	Main Feedback Received	Our Response
	<p>through a well-designed, well-connected and functional public realm.</p> <p>Development close to rail stations provides opportunity for improvements to access and public realm to create improved places for passengers. There are clearly identified requirements for improvements at Bromley South and Bromley North rail stations.</p> <p>The reprovision of the bus stand at Bromley North will support bus infrastructure and could see an increased use of existing rail services at Bromley North Station. There is also a genuine opportunity for public realm improvements.</p>	<p>improve heritage assets and the borough's public realm.</p>

5 Appendix 1

Local Plan Review

The borough's planning policy is being updated

The Borough's planning policy is being updated

This aims to:

- respond to local priorities
- protect Bromley's unique character
- guide future development



Look out for future consultations and get involved in this important review

www.bromley.gov.uk/LocalPlanReview

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LONDON BOROUGH OF BROMLEY

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (AS AMENDED)

NOTICE OF CONSULTATION ON BROMLEY LOCAL PLAN REVIEW 'ISSUES AND OPTIONS' (REGULATION 18) DRAFT

The London Borough of Bromley are reviewing the Bromley Local Plan. As part of this review, the Council is consulting on a Regulation 18 'Issues and Options' document. This document does not set out any intended policy approaches; the aim of the document is to gather views from a range of stakeholders to inform the development of the new Local Plan.

In terms of document structure, the 'Issues and Options' document sets out the current policy approach across a range of topics; notes relevant changes since the adoption of the Local Plan; and sets out how the new Local Plan could respond to these changes.

The document includes a number of questions for each topic area, to help focus representations on key issues, although representations are not required to address these questions.

The Bromley Local Plan 'Issues and Options' document can be viewed:

- Online at: <https://www.bromley.gov.uk/planning-policy/review-bromley-local-plan>
- In hard copy at Bromley Civic Centre, Stockwell Close, Bromley BR1 3UH, by making a prior appointment by contacting ldf@bromley.gov.uk.

Representations on the 'Issues and Options' document can be sent:

- by email to: ldf@bromley.gov.uk;
- in writing to: Head of Planning Policy and Strategy, London Borough of Bromley, Civic Centre, Stockwell Close, Bromley BR1 3UH; or
- via Survey Monkey at: <https://www.surveymonkey.co.uk/r/LBBissuesandoptions2023>

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

Please contact the Planning Policy team at ldf@bromley.gov.uk for further information.

Local Plan Review

Have your say!



Help shape the Borough's planning policy

Complete the consultation by
Friday 30 June to get involved in the review



Find out more at
www.bromley.gov.uk/LocalPlanReview



London Borough of Bromley News Release

22 June 2023

Still time to take part in Bromley Local Plan consultation

Residents, local businesses and community groups are reminded to have their say on a consultation to help guide the review of Bromley's Local Plan before it closes.

The submission deadline is Friday 30 June, which ends the nine-week consultation period. Submission can easily be completed online, by email or in writing, with details available at www.bromley.gov.uk/localplanreview.

The Local Plan sets out local planning policies for the whole borough and is a key document when determining local planning applications. This early consultation looks at the issues and options to be considered in the Local Plan review. Further consultation will also be held later in the review process.

Councillor Yvonne Bear, Executive Councillor for Renewal, Recreation and Housing said: "I want to thank all those who have already provided their valuable feedback in this consultation that will help to direct our review and ensure we focus in on the issues that are most important for local communities. There is so much that makes our borough special, from bright green spaces and impressive heritage sites, to attractive housing and thriving town centres. Planning policy is vital to protecting all these elements while still encouraging regeneration and development that is suited to Bromley. I hope all those who have not responded will do so now, so that we can consider as many views as possible in this review process."

The current Local Plan was adopted in January 2019 following an extensive process and multiple rounds of consultation. The Council is required to review the plan every five years, which helps to ensure that it reflects the Council's current social, environmental and economic priorities, including those outlined in the latest Corporate Strategy [link to www.bromley.gov.uk/downloads/file/572/making-bromley-even-better-corporate-strategy], as well as recent changes to national and London-wide planning policy.

The consultation document sets out information on the current Local Plan policy approach across a range of topics, notes relevant changes since the adoption of the Local Plan and sets out how the new Local Plan could respond to these changes. The document includes a number of questions for each topic area, with views encouraged from residents around these key issues, although responses are not required to address these questions in particular.

The consultation document is available online as well as at the Civic Centre by appointment. Find out more and submit responses through the Council website [link to www.bromley.gov.uk/planning-policy/review-bromley-local-plan].

ENDS

For media enquiries, please contact James George, Public Affairs Officer, on 020 8313 4565 or email james.george@bromley.gov.uk

Local Plan Review

Have your say
on the borough's
planning policy



bromley.gov.uk/LocalPlanReview

