



# **Local Plan Integrated Impact Assessment**

Scoping Report – July 2025

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# 1 Introduction and purpose

- 1.1 The London Borough of Bromley is preparing a new Local Plan to guide future development in the Borough. The new Local Plan will set out the broad uses of land and will be used to determine planning applications in conjunction with national planning policy and the London Plan.
- 1.2 Section 19 of the Planning and Compulsory Purchase Act 2004<sup>1</sup> (the PCPA) requires a Local Planning Authority to carry out a **Sustainability Appraisal (SA)** of the Plan to identify the extent to which it will help to achieve environmental, social and economic objectives. The appraisal should document how different options have been assessed and what likely impacts have been identified. It provides the opportunity to reflect and make alterations to the Plan along the way.
- 1.3 The criteria for the determining the environmental effects of proposals is based on the Strategic Environmental Assessment regulations (Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004)<sup>2</sup>; these regulations require preparation of a Strategic Environmental Assessment (SEA). The SA also includes additional relevant criteria for considering social and economic impacts. Where this document refers to a SA, it is referring to the combined SA/SEA that fully incorporates the SA and SEA legislative requirements. A simplified table of requirements is set out in Appendix 1 (taken from Planning Practice Guidance).
- 1.4 The appraisal accompanies the plan development in an iterative process, as set out in the flow chart at Appendix 2 (taken from Planning Practice Guidance). The initial scoping of the appraisal (Stage A) covers the following:
  - plans, policies, strategies and programmes which influence the plan and appraisal - at international, national, regional and local levels. Some are referred to directly within the document, but a more comprehensive list is set out in Appendix 3.
  - information about Bromley today – the “baseline” for the appraisal, and the social, environmental and economic issues that it raises.
  - the broad criteria to be used to assess the Plan, set out as a series of objectives.
- 1.5 A draft scoping report was sent to the three statutory consultees - Natural England, the Environment Agency and Historic England (Stage A5 as noted in Appendix 2) - as part of a formal consultation process from 14 February to 24 March 2025. Responses were received from all three statutory consultees; Appendix 4 sets out the comments received, and amendments made as a result of these comments. The Council intends to use the updated framework to inform and assess the forthcoming stages of the plan<sup>3</sup> (Stages B and C as noted in Appendix 2). However, the Council is inviting further comments on the draft Scoping Report as part of the Local Plan Review Direction of Travel consultation, **from 25 July to 26**

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<sup>1</sup> Section 19 of the Planning and Compulsory Purchase Act 2004

<https://www.legislation.gov.uk/ukpga/2004/5/section/19>

<sup>2</sup> Strategic Environmental Assessment Regulations

<https://www.legislation.gov.uk/uksi/2004/1633/schedule/1/made>

<sup>3</sup> The timetable for the production of the Local Plan is set out in the Local Development Scheme, available here: <https://www.bromley.gov.uk/downloads/file/60/local-development-scheme-2025>

**September 2025.** We welcome comments on any aspect of the document, but in particular, we would be interested in your comments on the following:

- Does the document accurately cover the scope of the IIA and address relevant statutory requirements?
- Does the baseline information and summary of issues set out in section 2 provide an accurate picture of the issues affecting Bromley? If not, what additional data could be provided to ensure full consideration of the relevant issues affecting the Borough?
- Are there any additional plans, policies and programmes which we have not listed within the baseline information section (section 2) and/or in the longlist at Appendix 3, that are relevant to the preparation of the new Local Plan and therefore should be included?
- Do the proposed IIA objectives allow for full consideration of the environmental, economic, social, health and equalities issues identified in the baseline information, and will the proposed objectives ensure the potential effects of policies, and their alternatives are assessed accurately?

1.6 The sustainability appraisal will form part of an Integrated Impact Assessment to incorporate the requirements of other legislation and best practice:

- An **Equalities Impact Assessment (EqIA)**, to measure the potential impacts (positive and negative) of the new plan policies on key protected characteristics set out in the Equality Act 2010<sup>4</sup>
- A **Health Impact Assessment<sup>5</sup> (HIA)**, to measure the significance of the potential health and wellbeing impacts, both positive and negative, of the new plan policies.
- A **Habitats Regulation Assessment (HRA)**, a separate assessment will be made to comply with the Conservation of Habitats and Species Regulations 2017<sup>6</sup>. to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

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<sup>4</sup> Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>

<sup>5</sup> Health Impact Assessment guidance  
[https://assets.publishing.service.gov.uk/media/5f93024ad3bf7f35f184eb24/HIA\\_in\\_Planning\\_Guide\\_Sept2020.pdf](https://assets.publishing.service.gov.uk/media/5f93024ad3bf7f35f184eb24/HIA_in_Planning_Guide_Sept2020.pdf)

<sup>6</sup> Conservation of Habitats and Species Regulations 2017  
<https://www.legislation.gov.uk/uksi/2017/1012/regulation/105>

## 2 Baseline information

- 2.1 The Environmental Assessment of Plans and Programmes Regulations 2004<sup>7</sup> and SEA Directive 2001/42/EC legislation require a discussion of the “...*relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan...*”; and “*the environmental characteristics of areas likely to be significantly affected*”. For SAs, the baseline and identification of key issues must also consider social and economic aspects in addition to the environmental issues specified in the SEA Directive. Health and equalities issues will be linked to the HIA and EqIA. The baseline information is the starting point to help ensure a robust assessment of the potential effects (positive or negative) of the new Local Plan policies as they are developed, as well as assessing reasonable alternative policy approaches.
- 2.2 There will likely be a degree of crossover between the identified issues. The baseline information may also be useful in identifying existing issues and opportunities that could be considered in the Local Plan review as well as informing the development of the IIA objectives. It may also be relevant to any future Local Plan monitoring framework.
- 2.3 The baseline information set out in this section provides a broadly comprehensive picture of environmental, social, economic, health and equalities issues in Bromley. **The baseline information is based on information available at the time of writing, and will be subject to change over time as and when new information becomes available.** Where there are data gaps in relation to particular issues, the Council will attempt to source further information to address these gaps on an ongoing basis, and will update the baseline (along with any other consequential amendments) where necessary.

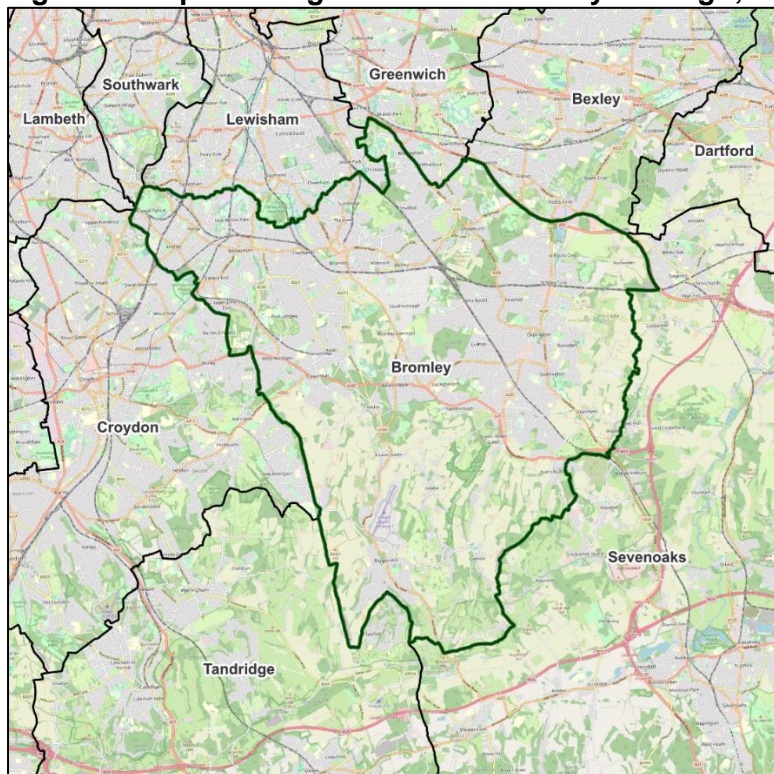
### The London Borough of Bromley today

- 2.4 The London Borough of Bromley is one of the outer southeast London boroughs, bordering Kent (Sevenoaks District) and Surrey (Tandridge District) as well as the boroughs of Bexley, Greenwich, Lewisham, Southwark, Lambeth and Croydon. The Borough is the largest in London by area, measuring roughly 150 square kilometres.

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<sup>7</sup> The Environmental Assessment of Plans and Programmes 2004  
<https://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

**Figure 1: map showing location of Bromley borough; © [OpenStreetMap](#) contributors**



- 2.5 There is a wide variation in character across the borough, from open landscapes and agricultural land in the east and south, through villages and suburban towns to more urban areas in the north and west. There are public parks and gardens, public and private sports grounds, shopping parades and town centres, commercial and industrial sites and Biggin Hill airport. Residential development is equally varied with isolated farms and rural dwellings, detached, semi-detached and terraced properties with gardens through to apartment blocks.
- 2.6 Between the last two censuses (held in 2011 and 2021), the population of the borough increased by 6.7%, from just under 309,400 in 2011 to around 330,000 in 2021. The population increased by a smaller percentage than the overall population of London (7.7%), but at a similar rate to the overall population of England (which increased by 6.6% since the 2011 Census). In 2021, Bromley was home to around 15.7 people per hectare, compared with 14.7 in 2011. This makes it the least densely populated local authority area in London<sup>8</sup>.

### **Bromley's population**

- 2.7 Bromley has the 6<sup>th</sup> highest population within London. The 2021 Census shows that the borough's population has increased to 329,991 people (Female 171,733 and Male 158,258<sup>9</sup>). Population data shows that 17.6% of the borough's population are 65 years and over.

<sup>8</sup> <https://www.ons.gov.uk/visualisations/censusareachanges/E09000006/>

<sup>9</sup> <https://www.ons.gov.uk/datasets/TS008/editions/2021/versions/4>

**Table 1: Bromley population by age (Census 2021)<sup>10</sup>**

<b>LB Bromley population age</b>	<b>Total population by age</b>	<b>% population by age</b>
Total: All usual residents	329,989	100.0
Aged 4 years and under	19,491	5.9
Aged 5 to 9 years	20,627	6.3
Aged 10 to 15 years	24,785	7.5
Aged 16 to 19 years	13,354	4.0
Aged 20 to 24 years	14,676	4.4
Aged 25 to 34 years	40,752	12.3
Aged 35 to 49 years	73,535	22.3
Aged 50 to 64 years	64,529	19.6
Aged 65 to 74 years	29,853	9.0
Aged 75 to 84 years	19,373	5.9
Aged 85 years and over	9,014	2.7

2.8 The Bromley draft Strategic Housing Market Assessment (draft SHMA) highlights a potential 12% population increase from 2023-2041 (source of ONS 2018 mid-year estimates quoted within draft SHMA) with half of the increase associated with people 65 years and over.

2.9 The Office of National Statistics<sup>11</sup> provides Local Authority Area Profiles which reveal the following:

- Ethnic background: 79.7% of the population were born in the UK, with 76.5% of the borough's population identifying as 'white' with the next largest group being 'Asian, Asian British or Asian Welsh' (8.3%) followed by 'Black, Black British, Black Welsh, Caribbean or African' (7.6%), 'Mixed or Multiple ethnic groups' (5.4%) and 'Other ethnic group' (2.3%).
- Religion: almost half of the population of Bromley defined themselves as Christian whilst 37% state that they have no religion.
- Economic Activity: 63% of residents over 16 years of age (excluding students) are economically active, 3% are unemployed, and over a fifth (20.9%) are retired. Of those employed, 13% work in the 'Human health and social work activities' sector. Four other sectors each provide employment for approximately 10% of the population namely:
  - Wholesale and retail trade; repair of motor vehicles and motorcycles
  - Professional, scientific and technical activities
  - Education
  - Financial and insurance activities
- Employment: Bromley has a high percentage of managerial and professional occupation

<sup>10</sup> [2021 Census Profile for areas in England and Wales - Nomis \(nomisweb.co.uk\)](https://nomisweb.co.uk/)

<sup>11</sup> [Nomis - 2021 Census Area Profile - Bromley Local Authority](https://nomisweb.co.uk/)

- Managers, directors and senior officials - 17.2% compared to the England figure of 12.9%.
- Professional occupations - 26% compared to the England figure of 20.3%.
- Associate professional and technical occupation - 15.9% compared to the England figure of 13.3%.

### Deprivation

2.10 The English Index of Multiple Deprivation (the IMD) is the official measure of relative deprivation at small-area level in England. The IMD ranks and scores the 32,844 neighbourhoods (Lower-layer Super Output Areas - LSOA) in England and the most recent indices were published in 2019<sup>12</sup>.

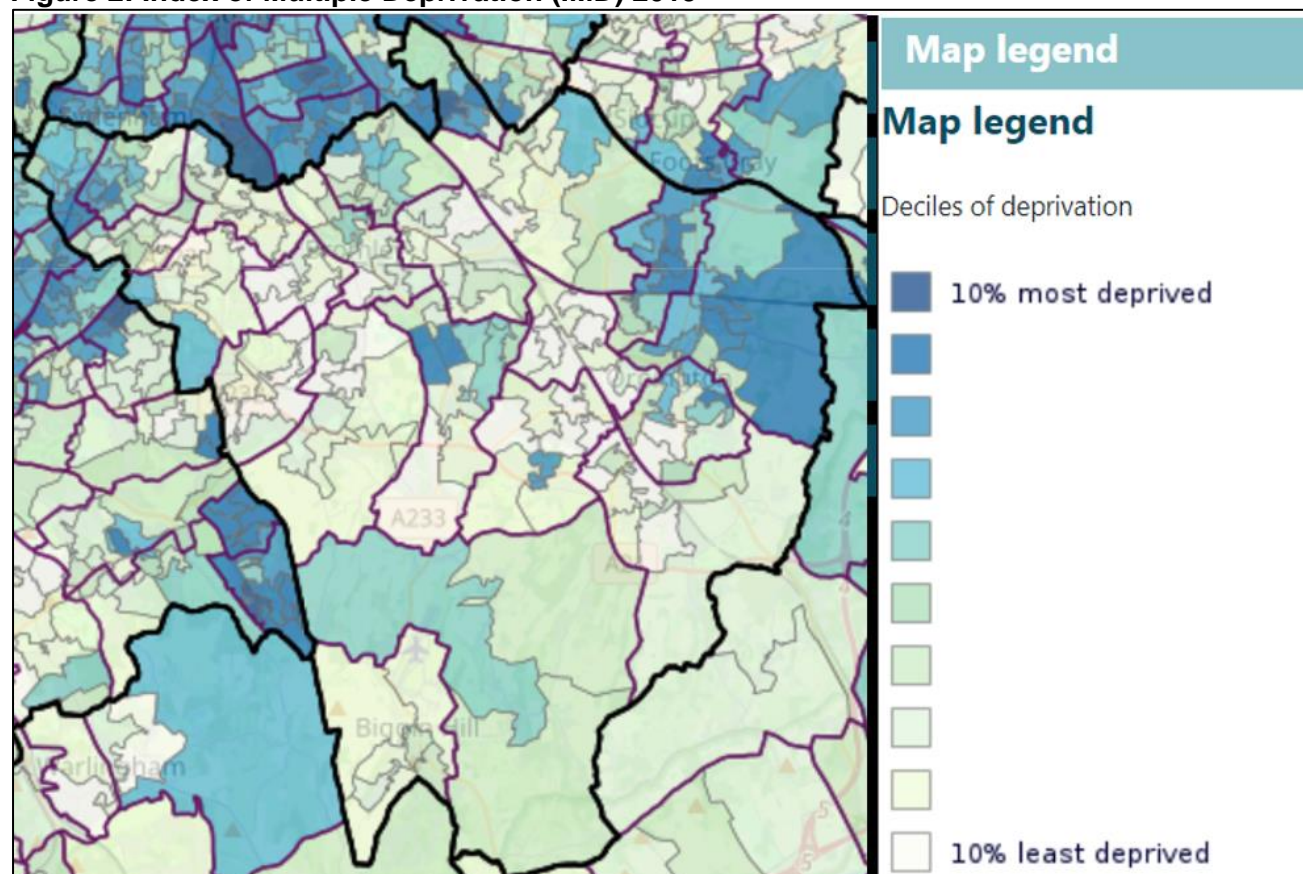
2.11 Overall Bromley has low levels of deprivation; however, there are pockets of deprivation with 12 neighbourhoods in the 20% most deprived, located in the Cray Valley, Anerley, Bromley Common and in Mottingham, which also includes one neighbourhood in the 10% most deprived.

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<sup>12</sup> [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)



**Figure 2: Index of Multiple Deprivation (IMD) 2019**



## Housing

2.12 The 2021 Census shows that there are 135,828 households within the borough. One person households comprise 28.5% of households, single family households account for 65.5% of households, with “Other” households making up 6.1% of households within the borough<sup>13</sup>. Table 2 below sets out the type of housing that make up the households (Census 2021):

**Table 2: LB Bromley households (Census 2021)<sup>14</sup>**

Type of household	Number of households	% of households
All households	135,827	100.0
Detached	24,563	18.1
Semi-detached	40,562	29.9
Terraced	27,990	20.6
In a purpose-built block of flats or tenement	31,895	23.5

<sup>13</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021#household-composition>

<sup>14</sup> [2021 Census Profile for areas in England and Wales - Nomis \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

Type of household		
Part of a converted or shared house, including bedsits	7,920	5.8
Part of another converted building, for example, former school, church or warehouse	896	0.7
In a commercial building, for example, in an office building, hotel or over a shop	1,773	1.3
A caravan or other mobile or temporary structure	228	0.2

2.13 In terms of housing tenure, the above households include the following: 69.4% are owner occupier or shared ownership properties, 13.2% of the households are social-rented and 17.5% fall within the private rented sector or are rent free. The draft SHMA highlights a potential future increase in couples / single person households including “other” households that would include unrelated residents. From 2023 – 2041 households with couples with no dependent children could increase by 5,900 households, single person households could increase by 3,600 households and “other” households could increase by 1,200 households

## Housing need

2.14 Bromley’s Housing Strategy 2019-2029<sup>15</sup> sets out a number of issues relating to affordable housing need in the borough. It highlights that like many parts of the country and London, Bromley is experiencing severe affordable housing pressures. It sets out that affordable housing demand outstrips supply. The Strategy specifies that homelessness applications are increasing and the need for social-rented accommodation is increasing. As of the end of March 2024 there were 3,278 households on the Council’s Housing Register, of which 41 households were in the highest Emergency Band and 908 were in Band 1, both of which reflect more urgent housing need.

2.15 Four priorities are identified within the Housing Strategy as follows:

- Increasing the number of homes in Bromley;
- Better quality, more affordable homes;
- Preventing and tackling homelessness;
- Supporting vulnerable people.

2.16 The Housing Strategy highlights a number of issues relating to affordable housing provision in addition to Council wide goals to assist further provision in the future including delivering homes on Council-owned sites; robustly pursuing opportunities to bring empty homes back into use; and working with partners such as housing associations to improve the supply and quality of affordable housing.

<sup>15</sup> <https://www.bromley.gov.uk/downloads/file/1286/bromley-council-housing-strategy-2019-2029>

## Affordable housing need

- 2.17 In 2014, the southeast London sub region commissioned a Strategic Housing Market Assessment (SHMA)<sup>16</sup>, to assess housing need across Bexley, Bromley, Greenwich, Lewisham and Southwark. The study demonstrates a high level of need across the sub-region and highlights a number of key challenges and issues, including a total housing requirement of 7,188 units per annum across the sub region and an estimate of net annual affordable housing need of 5,000 units per annum in southeast London. In Bromley, the 2014 SHMA identified a net annual need for affordable housing of about 1,400 units per annum. The Council are in the process of preparing a new SHMA which will establish an up to date affordable housing need figure.
- 2.18 Affordable housing delivery figures as published by the GLA for 2019/20 – 2023/24<sup>17</sup> set out that the total number of affordable dwellings completed in Bromley during the 5 year time period is 411 units. It highlights that there is still a significant need for affordable housing in the borough. This is from unmet need established in the 2014 SHMA and from whatever need has (and continues to) materialise since the SHMA was produced. The 2014 sub-regional SHMA is currently being updated on a borough-wide basis.
- 2.19 In policy terms affordable housing is secured on sites of 10 units or more. There are cases where 100% affordable housing has been secured on site (in some cases for less than 10 units and in other cases more than 10 units) by registered providers or more recently the Council.

**Table 3: Housing affordability of southeast London boroughs**

	Median house prices 2023 (September 2023) <sup>18</sup>	Lower quartile house prices (September 2023) <sup>19</sup>	Affordability ratio (March 2024) <sup>20</sup>
Bexley	£425,000	£332,000	11.53
Bromley	£525,000	£375,000	13.04
Greenwich	£470,000	£365,000	13.28
Lewisham	£477,500	£360,000	12.1
Southwark	£550,000	£410,000	12.7

- 2.20 Table 3 above illustrates that Bromley had one of the highest median and lower quartile house prices of the southeast London boroughs in 2023 (apart from Southwark). The higher house prices are also reflected in the affordability ratio (house price to workplace based earnings) for the borough which show that Bromley has the second highest ratio amongst the southeast London boroughs. The affordability ratio is an important indicator of housing affordability, the

<sup>16</sup> <https://lewisham.gov.uk/-/media/files/imported/selondonshma2014.ashx>

<sup>17</sup> <https://www.london.gov.uk/programmes-strategies/housing-and-land/increasing-housing-supply/affordable-housing-statistics>

<sup>18</sup> [Median house prices for administrative geographies: HPSSA dataset 9 - Office for National Statistics](#)

<sup>19</sup> [Lower quartile house prices for administrative geographies: HPSSA dataset 15 - Office for National Statistics](#)

<sup>20</sup> [House price to workplace-based earnings ratio - Office for National Statistics](#)

higher the ratio the less affordable house prices are based on workplace based earnings within a local authority area.

## **Older people**

- 2.21 Bromley has the second largest older people population in London with the 2021 census indicating 58,245 persons aged 65 and 29,823 over 75 years.
- 2.22 The draft SHMA indicates that of Bromley's 43,350 projected population increase (between 2023 and 2041) nearly half of the increase (48%, or 20,743) will be over 65, with 11,138 additional people (28%) being 75 years plus and 3,690 additional over 85 years (8.5%).
- 2.23 The draft SHMA also highlights that 11,720 residents aged 75+ are single person households and that this figure is projected to increase by 4,579 in 2041.
- 2.24 Bromley's Housing With Care Needs Analysis (2023)<sup>21</sup> indicates that by 2040, 40% of those aged 75 and over in the borough will be unable to manage at least one domestic task on their own and 37% unable to manage at least one self-care activity on their own. 58% of those aged 75 and over will be living with a limiting long-term illness raising to 70% in those aged 85 and over. These are particularly important considerations when establishing the types of accommodation required and the need for housing specifically for older people, care homes and social infrastructure, noting Bromley's Loneliness Strategy 2022-2026<sup>22</sup>.
- 2.25 Reflecting the size of its older population, Bromley has one of the largest numbers of care homes in London with 41 registered care homes for those age 65+. Whilst there is a good mix of large and smaller providers that support a wide range of current needs (including dementia, elderly mentally infirm and physical disability) there is limited provision for individuals with behaviours that challenge. The Council assessed the care home market and agreed its Market Sustainability Plan on 29th March 2023<sup>23</sup>. The Plan noted that since 2021, the nature of provision has shifted with a loss of the more affordable homes and an increase in luxury self-funder provision, however, the net number of beds in the borough has not changed significantly over recent years.

## **People with disabilities<sup>24</sup>**

- 2.26 From 2011 Census data it was predicted that in 2021 approximately 7% of residents in Bromley had a disability or long-term health condition that effected their day-to-day activities a lot, 8% said they were affected a little by their disability or condition. These percentages are similar to the London average, but less than the proportion in England.
- 2.27 The top 5 causes of years lived with disability in Bromley remained the same from 2009 to 2019 and include musculoskeletal disorders, mental disorders, other non-communicable diseases, neurological disorders, and diabetes & Chronic Kidney Disease.
- 2.28 One of the main burdens of disability in Bromley is mental health disorders. The Public Health England (PHE) 'Fingertips' profiling tool<sup>25</sup> estimated the prevalence of common mental health disorders in Bromley in 2017 as 15.1% for 16+ years and 9.1% for 65+ years, both lower than the equivalent estimates for England. However, no estimates were available for under 16s, and all estimates predate Covid 19 which impacted mental health.

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<sup>21</sup> [Appendix Housing with Care Report ACH PDS 27.06.23.pdf](#)

<sup>22</sup> [Bromley's tackling loneliness strategy - Tackling loneliness](#)

<sup>23</sup> [Market Sustainability Plan - London Borough of Bromley](#)

<sup>24</sup> <https://www.bromley.gov.uk/downloads/file/3408/demography-jsna-chapter>

<sup>25</sup> [Common Mental Disorders | Fingertips | Department of Health and Social Care](#)

- 2.29 Bromley's School Places Commissioning Plan 2024<sup>26</sup> indicates an average annual growth of 14% for the number of children and young people with an Education Health and Care Plan (EHCP) over the last 3 years has outstripped London and national comparators.
- 2.30 People with a learning disability have a shorter life expectancy. This is due to them being disproportionately affected by certain health conditions including coronary heart disease, respiratory disease and epilepsy.

### **Gypsies, Roma & Travellers (GRT) including Travelling Showpeople**

- 2.31 The Bromley Traveller Accommodation Assessment (2016) recorded 48 permitted pitches and identified a shortfall of 10 pitches and an additional need for 'up to 4 pitches' identified from the Council Traveller Sites waiting list (addressed through churn on Local Authority sites).
- 2.32 London Plan Policy H14B sets targets (in Table 4.4) for boroughs that have not undertaken a needs assessment since 2008. Bromley produced its assessment in 2016, and as such the London Plan targets in Policy H14 do not apply.
- 2.33 Bromley's assessment projected an additional need for 29-30 pitches up to 2031 and to date 10 additional pitches have been permitted (7 permanent and 3 temporary). Currently there are 56 Gypsy and Traveller Pitches with planning permission in the borough, including 53 pitches with permanent permission (of which 36 are on 2 Council run sites, 17 on private sites) and 3 pitches with temporary permission. Although additionally Bromley Local Plan Traveller site allocations offer potential for permission to be sought for further pitches (including the 10 pitches identified as need in 2016).
- 2.34 The Borough also makes provision for Travelling Showpeople, with the Bromley Traveller Accommodation Assessment (2016) identifying a need for 2 plots in addition to the 29 plots existing at that time. The assessment suggested a further requirement for 8 plots up to 2031. To date an additional 2 plots have been permitted producing a total of 31 permitted Travelling Showpersons plots in the borough.
- 2.35 The need for pitches will be reviewed in light of the London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) due to be published in 2025.

### **Student Accommodation**

- 2.36 The draft SHMA highlights that Bromley is not the central base for a university and there are no known expansion plans/plans for purpose-built student accommodation (PBSA) from universities which may be accessible from Bromley. In the London Plan, Policy H15 considers the need for PBSA. The Plan identifies a London-wide annual need for 3,500 units of PBSA but does not allocate borough benchmarks or targets. The London Plan states that the need will vary with changes in higher education provider' estates in the future.

### **Self and custom build housing**

- 2.37 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) requires local authorities to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority's area for their own self-build and custom housebuilding.

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<sup>26</sup> Item 20d [Agenda for Children, Education and Families Policy Development and Scrutiny Committee on Tuesday 17 September 2024, 7.00 pm](#)



- 2.38 The register is an indicator of demand for self-build and custom housebuilding in the area and should, along with other information, inform the Council's work on future housing need and supply. The Council has a duty to grant planning permission for enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in its area. The level of demand is established by reference to the number of entries on the self-build register during a "base period". This is a period beginning on 31st October one year and ending on 30th October the following year. The Council has three years to permission the equivalent number of plots as there are entries on the register for a particular base period.
- 2.39 Bromley's register first came into effect in April 2016, reflecting the regulations at the time. Further Regulations were to allow local authorities to introduce additional criteria for entry onto the register – including a local connection test.
- 2.40 In November 2020, the Bromley Development Control Committee agreed the introduction of a local connection test, to be used to assess future applications for entry onto Part 1 of the Bromley self-build and custom housebuilding register. The register is therefore split into two parts: entries on Part 1 of the register count towards the number of suitable serviced plots that the council must grant development permission for. Entries on Part 2 do not count towards the requirement for serviced plots, but the council must have regard to the entries on Part 2 when carrying out planning, housing, land disposal and regeneration functions.
- 2.41 The Council considers that any planning permission for a new or replacement dwelling that has commenced and has a CIL Form 7 Part 1 exemption form should be counted as a relevant permission for the purpose of meeting self-build demand. This gives a strong indication that the development will come forward as self-build.
- 2.42 The Council has met the self-build demand in full since the end of base period 1.

**Table 4: Bromley self-build and custom housebuilding register statistics up to 30 October 2024**

Base Period	Period	Total Entries onto the register	Pt 1	Pt 2
1	1 April 2016 to 30 October 2016	0	0	0
2	31 October 2016 to 30 October 2017	36	4	32
3	31 October 2017 to 30 October 2018	22	2	20
4	31 October 2018 to 30 October 2019	29	4	25
5	31 October 2019 to 30 October 2020	19	1	18
6	31 October 2020 to 30 October 2021	65	9	56
7	31 October 2021 to 30 October 2022	38	22	16

Base Period	Period	Total Entries onto the register	Pt 1	Pt 2
8	31 October 2022 to 30 October 2023	23	5	18
9	31 October 2023 to 30 October 2024	36	13	23
<b>TOTAL</b>		<b>268</b>	<b>60</b>	<b>208</b>

## Housing land supply

- 2.43 The current published five-year housing land supply (5YHLS) (covering the period 2021/22 to 2025/26) is 3,245 units or 3.99 years supply. This position was agreed at the Council's Development Control Committee (November 2021) and acknowledged as a significant undersupply.
- 2.44 The Housing Delivery Test (HDT) 2023 results (December 2024) indicate that housing delivery against Bromley's housing requirement has fallen below 85% over the HDT period; this requires the addition of a 20% buffer to the Council's housing requirement over the FYHLS period (in accordance with Footnote 8 of the NPPF).
- 2.45 Subsequent to this, an appeal decision (October 2024, appeal ref: APP/G5180/W/24/3340223) concluded that the Council had a supply of 2,628 units or 2.4 years; this figure assumes the London Plan target of 774 units per annum applies from FY 2019/20 and factors in shortfall in delivery against past targets since 2019. This is considered to be a very significant level of undersupply. For the purposes of assessing relevant planning applications this means that the presumption in favour of sustainable development may apply. The Council is in the process of preparing an updated FYHLS position, reflecting changes since the last published position in November 2021.
- 2.46 The borough's housing target is made up of housing delivery on large sites (>0.25ha) and small sites (<0.25ha). The 2021 London Plan sets out that targets are based on delivery on previously developed land. These sites will contribute to the draft Local Plan's housing trajectory and include allocations, planning permissions and windfall sites. Policy H2 Small Sites of the London Plan recognises the importance of small site delivery in contributing to housing delivery in London. The policy highlights that development plans should recognise that local character evolves over time and change may be required in appropriate locations to accommodate additional housing. The preparation of site-specific briefs, masterplans and housing design codes for small sites is encouraged within Policy H2. Delivery on large and small sites could include allocated and windfall sites, new build development, conversions of existing residential and non-residential properties, mixed-use developments, non-self-contained housing and modular housing.
- 2.47 The current housing target is informed by the 2017 London-wide SHLAA. The Mayor is currently in the process of updating the SHLAA, which will inform updated housing delivery targets for all London boroughs following the adoption of the new London Plan.

## Summary of issues

- There is a continuing challenge to balance population change with choice and affordability of homes including national and regional goals, and local statutory responsibilities.

- There are a variety of housing needs within the local community, covering different types and sizes and tenures of dwellings.
- The replacement of old and poor-quality housing, both private and public, is important to ensure that the housing stock provides good quality homes for all in the long-term.

## Health and wellbeing

### General health

2.48 Although Bromley is a relatively prosperous borough the communities within Bromley differ substantially and therefore whilst health and wellbeing in Bromley is generally considered to be good, there are specific health issues related to local areas of deprivation, notably in

- Mottingham
- Crystal Palace, Penge & Anerley
- Bromley Common
- The Cray Valley

2.49 Health and wellbeing in Bromley also vary across the generations, notably increasing complexity of health needs in the older population; and higher than the national average (and rising) proportion of young people with social, emotional or mental health issues. In Bromley:

- 18% of people are aged 65 or over, with Bromley residents averaging 17.7 years of poor health<sup>27</sup>
- 13.2% of children live in low-income families.
- Life expectancy is 8.1 years lower for men and 6.1 years lower for women in the most deprived areas, compared with the least deprived areas

2.50 Factors such as stress, unemployment, debt, loneliness, lack of education and support in early childhood, insecure housing and discrimination can affect 30-55% of our health outcomes<sup>28</sup>. Social prescribing connects patients to groups, activities and services in their communities to meet their social, emotional and practical needs that affect their health and wellbeing. They are the bridge between the GP and all the non-healthcare services available in the community.

2.51 The South East London Integrated Care Strategic Priorities (2023-28) sets out five cross-system strategic priorities:

- Prevention and wellbeing: Avoiding ill health and helping people in southeast London to live healthier lives.
- Early years: Making sure that parents, children and families receive the most effective support before and during childbirth and in each child's early years.
- Children's and young people's mental health: Making sure that children and young people receive early and effective support for common mental health challenges.
- Adults' mental health: Making sure that adults in southeast London receive early and effective support for common mental health challenges.

<sup>27</sup> [SEL ICS Estates Strategy Summary](#)

<sup>28</sup> [Who is a Social Prescriber and how can they help me? | Bromley GP Alliance](#)



- Primary care and people with long-term conditions: Making sure that people can conveniently access high-quality primary care services and proactive, joined-up care for continuing health needs.

2.52 The Joint Local Health and Wellbeing Strategy (2024 to 2029)<sup>29</sup> produced by the Bromley Health and Wellbeing Board, sets out the vision: *'for the people of Bromley to live independent, healthy and happy lives for longer'* and three priorities for the next five years:

- Improving health and wellbeing of young people
- Improving health and wellbeing of adults
- Disease prevention and helping people to stay well

2.53 Each priority area has a set of outcomes. The Strategy is informed by the Joint Strategic Needs Assessment (JSNA)<sup>30</sup>. A number of JSNA reports were updated in 2024, namely:

- Demography
- Suicide
- Children and Young People
- Older people

2.54 Reports were also produced in 2022 addressing

- Substance misuse
- Alcohol

2.55 The Bromley Loneliness Strategy<sup>31</sup> aims to prevent or reduce loneliness for all residents and to bring together partners in the statutory, independent, and voluntary sectors to deliver on three key priorities. Tackling loneliness can help to prevent adverse physical and mental health impacts and improve wellbeing.

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<sup>29</sup> [Bromley JointHealthAndWellbeingStrategy 2024-2029](#)

<sup>30</sup> [What is the Joint Strategic Needs Assessment? - Joint Strategic Needs Assessment](#)

<sup>31</sup> [Bromley's tackling loneliness strategy - Tackling loneliness](#)

## Health infrastructure

- 2.56 Current facilities in Bromley are composed of 42 member GP practices operating across 44 sites and covering a registered population of approx. 360,000 people. The average patient list size for the borough is 8,589, with individual lists ranging from just over 2,000 to almost 20,000 patients. Bromley has a single GP federation covering the borough, Bromley GP Alliance Ltd, of which 41 GP practices are shareholding members.
- 2.57 There are three main health service providers with presence within the borough:
- King's College Hospital NHS Foundation Trust (KCH) – Provides acute services from Princess Royal University Hospital and Orpington Hospital in the borough and some outpatient services from Beckenham Beacon. There is significant pressure on these acute services with the Trust seeking to shifting care out of hospital to proximal locations, Community Diagnostic Centres, or community properties (and creating additional capacity to achieve this).
  - Bromley Health Care (Bromley Healthcare CIC) – a community investment company and provider of general community services.
  - Oxleas NHS Foundation Trust (Oxleas) – mental health provider and provides some community health services for the borough and other parts of South London.
- 2.58 There is also a range of community Clinics across the Borough currently occupied by Bromley Healthcare CIC who provides our Community Services.

## Community infrastructure

### Education

- 2.59 Bromley has 101 schools, including 1 free school in the pre-opening stage. This consists of 19 secondary schools, 76 primary schools, 4 special schools and an alternative provision academy.
- 2.60 The Council and its partners added over 6,500 new permanent school places since 2011, involving expanding existing schools and the opening of 4 primary and 2 secondary Free Schools.
- 2.61 The most recent (2024) Education Commission Plan <sup>32</sup> sets out how the Council is addressing its statutory duty to provide school places, noting that '*after a long period of growth in primary school pupil numbers across England, Bromley is now experiencing the forecast fall in Reception Year applications and rolls*'. The projections indicate that this reduction will be sustained over successive years, impacting firstly on primary schools and subsequently on secondary schools. The Plan also notes that 5,184 pupils, approximately 8.9% of all Bromley's pupils (58,419), attend independent schools, including independent special schools.

### Primary education

- 2.62 Between 2010 and 2021 there was a significant increase in the school population, with Reception Rolls increasing from 3,442 to 4,051. However, since January 2021 there has been

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<sup>32</sup> Item 20d [Agenda for Children, Education and Families Policy Development and Scrutiny Committee on Tuesday 17 September 2024, 7.00 pm](#)

a reduction in Reception Year Places, with current rolls being 3,720, a fall of 8%. Since 2010 there has been a significant increase in primary school rolls in Bromley.

- 2.63 The GLA School Roll Projections currently project that Reception rolls will fall to 3,324, a fall of 11%. This is a significant change in the context within Bromley, where for several years we have not been affected by the significant fall in primary numbers affecting other London Boroughs. The current estimates would suggest that the Council will need to reduce the capacity of the primary sector by at least 20 forms of entry to ensure that the local area stays within its planning targets.

#### Secondary education

- 2.64 Since 2016 the corresponding increase in the need for primary school places has begun to be reflected in the need for secondary school places. There are currently 2,331 more pupils in Bromley secondary schools than there were in 2017/18, an increase of 10%. Over this same period, Year 7 rolls have increased from 3,672 to 3,922, an increase of 7%.
- 2.65 During this period, the Council has provided an additional 300 permanent secondary places through the expansion of Bishop Justus School, whilst a further 2,580 places were provided in working with the Department for Education to open Eden Park High School and Bullers Wood School for Boys through its free school programme.
- 2.66 Most secondary schools in the Borough have seen an increase in the need for places and are operating at capacity, with the most acute need in north-west Bromley. Conversely, secondary schools in Cray Valley have surplus capacity.

#### SEND (special educational needs and disabilities)

- 2.67 Since 2020, Bromley has experienced a growth of 64% in the number of children and young people aged 0-25 with an Education Health and Care Plan.
- 2.68 The three most significant type of need for children with an EHCP in Bromley are:
- Speech, Language and Communication Needs (SLCN),
  - Autistic Spectrum Disorder (ASD) and
  - Social, Emotional and Mental Health Needs (SEMH).
- 2.69 Over the past 10 years, the Council has significantly expanded its existing provision, with the number of children and young people with a special school place having increased by 442 since 2010, an increase of 97%, whilst also seeking to support children and young people with an EHCP in mainstream classes where appropriate.
- 2.70 Currently there are 225 pupils with an Education Health and Care Plan in independent special schools, and 85 in independent mainstream schools. Bromley has an approved special free school and multi-agency centre of excellence for Autism, Redwood Academy, for which a sponsor has been appointed and the Department for Education is currently undertaking a feasibility on the scheme.
- 2.71 Over the past year, the Council has opened a new additional resources provision (ARP) at Oaklands Primary School and is currently working with a number of schools and trusts investigating expanding provision.

#### Early Years Education / Childcare

2.72 Local Authorities have a statutory duty to ensure sufficiency of childcare. The demand from parents for early years provision is influenced by cost and currently the Department for Education funds education for children from the term after they reach certain ages:

- vulnerable children aged 2 years -15 hrs / week (term time).
- all children aged 3 and 4 years -15 hrs / week (term time) with an additional 15 hrs / week (term time) for the children of working parents.

2.73 The Council publishes Childcare Sufficiency data; the most recent ward data having been published in June 2023. The sufficiency data considers whether wards are priority areas for additional provision, and concluded 13 wards were not priority areas, 6 were priority areas and a further 3 wards were recorded as 'not yet priority areas'. However, from April 2024, DFE are rolling out increased education funding entitlements for Early Years children which is likely to increase the need when next assessed. These additional entitlements, for the children of working parents only, cover

- children aged 2 years - 15 hrs / week (term time) from April 2024
- children aged 9 months -15 hrs / week (term time) from Sept 2024 increasing to 30 hrs / week (term time) from Sept 2025.

### **Playing pitch and outdoor sport facilities**

2.74 An assessment of playing pitch and outdoor sport facilities across the Borough is being prepared in accordance with Sport England's PPS Guidance. This study will provide analysis of playing pitches in the Borough, across a range of sports. .

### **Youth provision**

2.75 Youth provision is made in a variety of settings, including at specific Council Youth Hubs. Other Youth activities are provided by churches or activity specific organisations such as Scout & Guide movements, Cadets, football clubs and theatre groups.

### **Theatres**

2.76 Bromley has three theatres:

- Churchill Theatre
- Bromley Little Theatre
- Beckenham Theatre (now based at Azelia Hall)

### **Libraries**

2.77 Bromley currently operates a network of 14 Libraries (currently managed by Greenwich Leisure Limited).

### **Community Halls and other venues**

2.78 There are many halls and venues available to the community managed by a wide range of organisations. Some, although not all, are listed on the Council's website which highlights 63 sites with halls for hire, comprising a mix of venue types, ownership and management. This includes 5 venues operated by or on behalf of the Council (Libraries and Council facilities) and various Church Hall sites. There is some community use of school facilities which is likely to increase as dual use is encouraged when new school buildings are developed.

## **Private Social Clubs**

2.79 There are also a number of private social clubs which serve members but not necessarily available to the wider community, which may be linked to sports clubs (e.g. tennis pavilions and snooker clubs).

## **Public Houses**

2.80 There are currently 96 pubs in Bromley (2024) which are clustered around the historically more densely populated areas of the borough. This includes:

- to the northwest, spreading down from Crystal Palace, through Penge and Anerley, towards Beckenham
- around Bromley Town Centre and along the historic strategic route running through the town centre and the Borough (A21)
- along The Cray Valley

2.81 Other favoured locations include local centres and parades, with only a few public houses in more isolated areas.

2.82 There was a significant loss of 50 pubs in the 10 years prior to 2014. However, whilst in the last 10 years, which included the COVID 19 pandemic shutdown, a further 14 have ceased trading, it is notable that 8 new pubs / drinking establishments have opened in the same period. The new establishments involve a combination of the reopening of closed pubs and conversions from a different use including retail units. This stabilisation in the numbers of pubs can be linked in part to changes in the pub offer including the growth in craft beer / microbar / microbreweries and the broadening of the range pub operators in Bromley.

## **Places of Worship**

2.83 There are at least 96 Places of Worship across the borough. They are almost exclusively Christian Churches including Church of England, Roman Catholic, Methodist, Baptist, United Reformed, Quaker, Salvation Army Greek Orthodox and more recently growth in Evangelical, Pentecostal and Charismatic. There is however also a Mosque and a Synagogue.

2.84 There are no Hindu or Sikh temples in Bromley but there are places of worship in neighbouring boroughs:

- Hindu temples in neighbouring Boroughs of Croydon & Lewisham
- Sikh temple in neighbouring Borough of Croydon

2.85 Some faiths also worship in other buildings such as schools, community buildings or the buildings of other religions.

## **Cemeteries and Crematoria**

2.86 There are various burial opportunities in the borough, including seven Council run and three privately operated. Of the Council run cemeteries capacity for "new" burials is mainly limited to Biggin Hill and St Mary Cray cemeteries, although cremated remains can be buried at Chislehurst and Bromley Hill Cemeteries.

### **Summary of issues**

- The ageing population has more complex health needs.
- There are increasing social, emotional and mental health issues amongst young people.

- There are health inequalities within the Borough including areas of deprivation which impact quality of life and life expectancy.
- Health and wellbeing facilities need to be maintained and upgraded to enable provision for the co-location of primary care and community services and integrated multi-disciplinary working.
- Community infrastructure supports strong, integrated communities, including both public sector provision and the wide range of community and private provision (such as places of worship, sports, social and cultural venues and private schools).
- There is a significant increase in the need for SEND (Special Educational Needs & Disabilities) education provision.

## Local economy

### Employment land

- 2.87 The London Borough of Bromley Employment Land and Space Study (ELSS) (January 2024) provides an up-to-date picture of employment land in the borough, establishing socio-economic and commercial market trends to explore local demand signals as well as current and future drivers of economic growth; and then identifying Bromley's future economic development needs through the analysis of different scenarios and sensitivities informed by the demand context.
- 2.88 Bromley has a larger economy than several of its neighbours with around 15,100 businesses and 109,000 jobs. This is mainly due to high levels of employment in sectors such as Health, Retail, Business Administration & Support Services and Education. Bromley's employment base has remained stagnant over the last five to ten years; while sectors such as Business Administration & Support Services (+20% jobs), Motor Trades (+17% jobs), Arts, Entertainment, Recreation & Other Services (+14% jobs) and Health (+13% jobs) have seen an increase in jobs, sectors including Manufacturing (-36% jobs), Property (-22% jobs), Professional, Scientific & Technical (-18% jobs) and Public Administration & Defence (-17% jobs) have declined in size.
- 2.89 Bromley has a high employment rate with 80% of working-age residents classified as employees or self-employed in 2021. This is higher than all neighbouring boroughs except Lambeth and Tandridge, and higher than Outer South London more broadly at 77%. Current figures are 7 percentage points higher than a decade earlier, representing positive progress in Bromley's economic profile.
- 2.90 This high employment rate may link to the fact that the borough has a high proportion of residents with higher level qualifications – 62% of residents are qualified to NVQ Level 4 (equivalent to degree-level) and above which is higher than several neighbouring boroughs including Bexley, Croydon, Dartford, Sevenoaks and Tandridge, though it is lower than the Outer South London and London averages (64% and 66% respectively).
- 2.91 Figure 9 of the ELSS shows that unemployment in Bromley stood at 7% in 2021, which was consistent with unemployment rates in adjacent Boroughs.
- 2.92 Bromley's occupational profile also reflects its qualifications profile with a higher proportion of residents working in Manager, Director and Senior roles (15%) compared to many of its neighbours and the Outer South London average (12%). Professional occupations account for the largest occupational group for Bromley's residents (35%) which again is higher than most neighbouring boroughs and above the Outer South London average (32%). This translates to a median gross annual salary of £37,749 for Bromley's residents versus £37,566 for Lambeth,

£35,165 for Tandridge and £34,509 for Greenwich which are also all above the Outer South London average at £34,472.

- 2.93 The borough's strong transport connectivity to Central London by rail, and to the wider southeast by road on the A1/M25, position Bromley as an attractive Outer London location to do business. For industrial uses in particular, this means that the borough is well-placed to capture the increase in last mile logistics and distribution activity nationally.
- 2.94 Bromley has a mid-sized local office market, with one primary submarket in Bromley Town Centre and secondary office clusters in Beckenham, Orpington, Petts Wood and St Mary Cray. However, in recent years, the quality of office space in Bromley has not kept pace with wider trends, particularly due its ageing office stock. Lack of existing quality office stock and the introduction of Permitted Development Rights in 2013 has seen Bromley's office inventory contract over the past ten years, as demolition activity and office-to-residential conversions have outpaced new construction.
- 2.95 Bromley's average office rents are around £23 per sq ft, which is lower than its more central neighbours (Southwark and Lambeth) and its less central neighbour, Croydon (£26 per sq ft). This likely links to the size, location and quality of the units let in Bromley versus these locations and suggests that demand for office properties may be stronger in some other locations.
- 2.96 Bromley has also seen lower levels of rental growth over the last ten years versus many of its neighbours – the borough saw a +52% increase in rental values from 2013 to 2023 which is lower than the Outer South London average (+64%). Some of Bromley's highest office rental values have been achieved in Beckenham, and Bromley Town Centre (up to £50 per sq ft) with most mid-range values achieved in Orpington, Penge and Hayes, Farnborough and Biggin Hill (£20 to £40 per sq ft).
- 2.97 Bromley's office vacancy rates are around 4% - this is lower than most neighbours except Bexley and Lewisham, and in line with Sevenoaks and Tandridge. This signals that the existing office stock is in demand and that there may be a need to consider whether there is a gap in provision in terms of the current offer.
- 2.98 Bromley has a mid-sized industrial market based around key industrial sites at the Cray Valley (comprised of Crayfields Industrial Park and St Mary Cray), Lower Sydenham, Elmers End and Biggin Hill. These sites serve manufacturing, wholesale and motor trades occupiers, among others, with employment in motor trades experiencing significant growth in the borough over the last decade.
- 2.99 The borough is also home to a specialised cluster of aviation-related businesses at Biggin Hill Airport, including businesses directly involved in aviation and engineering, and the wider supply chain at Biggin Hill Airport Aviation Centre, Biggin Hill Airport Trading Estate, Concorde Business Centre and Formula One Management.
- The total indirect and induced employment from both 'On-Airport' and 'Off-Airport' businesses is estimated to be 680-1,060 FTE jobs;
  - The total direct and indirect impact of activity on and off Biggin Hill Airport is estimated to be between £121m and £136m per annum.
- 2.100 New industrial developments such as at HALO Industrial Park in St Mary Cray, combined with increasing rental values and falling vacancy rates, suggests that Bromley's industrial space will continue to be in high demand moving forward.

2.101 Bromley's industrial rents are comparatively low at around £13 per sq ft – this is below most neighbouring boroughs including Bexley (£15 per sq ft), Croydon (£16 per sq ft), Greenwich (£14 per sq ft), Lewisham (£15 per sq ft), Lambeth (£23 per sq ft) and Outer South London more broadly (£15 per sq ft). The highest industrial rental values in Bromley have been achieved on isolated units around Lower Sydenham, Bromley Town Centre, Biggin Hill and the North of the Cray Valley (£45 to 60 per sq ft).

2.102 Bromley's industrial vacancy rates are around 5%, which is below the GLA's recommended 8% benchmark – vacancy rates lower than this mean that businesses looking to expand or locate in an area are often unable to therefore limiting potential economic growth of an area. The highest concentrations of vacant industrial units in Bromley are on the borough's main industrial estates including Lower Sydenham, Bromley, St Mary Cray and Biggin Hill. Vacancies in these areas are individual units that have not yet been re-let rather than concentrations of widespread vacancies.

2.103 The ELSS projects that between 66,000sqm and 89,000sqm of gross employment floorspace will be required to meet jobs growth projected to occur between 2022 and 2040. This is predominantly office floorspace, as shown on the extract from the ELSS below, although there is also a significant need for new industrial floorspace:

**Figure 3: extract from ELSS showing floorspace required to meet employment projections**

	Synthesis Scenario	Synthesis Scenario, including Churn allowance	Synthesis Scenario, including Churn and Windfall allowance
<b>Lower End of Range</b>			
EG(i)/(ii) (office)	43,972	44,806	55,294
B2/EG(iii) (general industrial)	15,394	16,826	17,905
B8 (warehousing)	6,640	7,983	15,724
Total	66,006	69,615	88,924
<b>Higher End of Range</b>			
EG(i)/(ii) (office)	58,797	59,631	70,119
B2/EG(iii) (general industrial)	30,760	32,192	33,271
B8 (warehousing)	13,268	14,611	22,352
Total	102,825	106,434	125,743

Source: Experian, GLA, Avison Young, ONS, British Property Federation, Co-Star, LBB

2.104 The ELSS identifies six sites which have the greatest opportunities for intensification or re-orientation, to contribute toward meeting employment projections: Oakfield Road, Lower Sydenham, Cray Avenue, Bromley South, Crayfields Industrial/Office Park and Biggin Hill.

2.105 The ELSS highlights that quantum of space alone will not address employment floorspace needs, and that each sector has different requirements in relation to affordability and space, particularly SMEs:

- Arts & Creative: Typically require creative studios and/or light industrial space. Often price sensitive so low-cost space is often a priority, alongside a preference to be around like-minded businesses.
- Professional, Scientific & Technical: Typically require co-working or office type space. Often require 'all in' rents to take advantage of economies of scale, and prefer flexible lease terms in case of expansion or contraction.
- Financial & Insurance: Similar to the above but more often require smaller private offices due to the sensitivity of their work.



- **Transport & Storage:** Typically require light industrial or industrial space. Dedicated private space preferred for security with rent free periods and flexible terms valued to allow businesses time to establish themselves and cover upfront capital costs.

## **Retail and town centres**

- 2.106 Retail and leisure uses contribute to Bromley's local economy, with around a fifth of jobs in the borough within the retail, accommodation and food services sectors.
- 2.107 As recognised in the London Plan, retailing is undergoing restructuring in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. As a result, retailing has evolved to become multi-channel, with a mix of physical stores, often supported by internet 'click and collect' in store or deliveries to homes, workplaces or pick-up points, and in other cases purely online businesses with no physical stores.
- 2.108 The shopping hierarchy of the Borough's established centres has evolved over a considerable period of time and is recognised in the London Plan. The centres are classified according to their existing role and function, and each performs a different but complementary role. The hierarchy is important in providing a range of services and facilities across the Borough.
- 2.109 Bromley Town Centre is the main retail centre for the Borough and its status is reflected in the London Plan. Bromley Town Centre is a competitive Metropolitan Town Centre, complementing others in the region and attracting a wide range of visitors to its shopping, cinema, theatre and restaurant areas. The centre has a night-time economy of regional/sub-regional importance and has the potential to accommodate a wider leisure and cultural offer. The Town Centre has benefited from a comprehensive programme of improvements in recent years, funded both from the Council and Mayor's fund.
- 2.110 The London Plan also identifies Bromley Town Centre as an Opportunity Area with the potential for delivering a minimum of 2,500 homes and an indicative 2,000 jobs. It has a high growth designation reflecting the town's capacity to accommodate strategically significant levels of retail, leisure and office growth.
- 2.111 Orpington is one of 34 Major centres in Greater London and the only one in the Borough, making it the second most significant centre in the borough after Bromley Town Centre. Orpington is a competitive shopping destination, however it is under pressure from competing facilities such as the Nugent Shopping Park and the proximity of larger centres, such as Bromley and Bluewater. Orpington functions as a strong and vibrant major centre, offering a good range of shopping, leisure and public amenities. The Local Plan requires development within Orpington Town Centre to provide a range of uses that will contribute towards its role as a Major Centre.
- 2.112 These centres, together with the district, local and neighbourhood centres, provide accessible shops, services and facilities for residents and wider communities across the Borough.
- 2.113 Individual shops and local neighbourhood parades also play an important role in the borough's retail hierarchy, providing access to essential day-to-day services.
- 2.114 GOAD survey centre reports show the health of the Boroughs town centres in terms of their vacancy levels in comparison to the UK average.

**Table 5: % Vacant outlets**

Town centre	Survey date	% vacant outlets	UK
Bromley	June 2023	14.19%	15.5%
Orpington	Aug 2023	11.9%	15.5%
Beckenham	Oct 2023	7.77%	15.5%
Petts Wood	Aug 2023	4.93%	15.5%
Biggin Hill	May 2023	6.38%	15.5%
Chislehurst	Aug 2023	10.14%	15.5%
Penge	Sept 2023	13.7%	15.5%
West Wickham	Oct 2023	6.54%	15.5%

2.115 A new Retail and Leisure study has been prepared and provides information on projected future retail and leisure need in Bromley, which will then be translated into floorspace requirements. This will help inform future Local Plan retail policies, designations and allocations.

#### Impact of planning reform

2.116 Recent changes to the Use Classes Order could have a significant impact on the retail offer in town centres as shops can now convert to previously separate uses without requiring planning permission.

2.117 Additionally, new permitted development rights allow Class E uses to convert to residential use. The new PD rights have real potential to undermine the overtly retail function. The Council has put in place a number of Article 4 Directions in designated town centres and neighbourhood centres to remove these new permitted development rights.

#### **Digital Infrastructure**

2.118 The Bromley Economic Development Strategy 2021 - 2031<sup>33</sup> indicated that in 2021 Bromley compared well at slower speeds of broadband connectivity, with 4G mobile coverage widespread in Bromley, covering all urban areas. However, some rural pockets of the borough still miss out on reliable 4G mobile coverage and across the whole of our borough 5G mobile coverage is exceptionally limited with only 1% of premises (fewer than 2,000 premises) having access to full fibre broadband, significantly below the Outer London Borough average of 14%.

2.119 Generally the Borough has improved full-fibre broadband coverage over the past few years. Five out of the nine telephone exchange areas (i.e. Farnborough, Orpington, Biggin Hill, Chislehurst and Hayes Common) have been upgraded by Openreach. The required full-fibre broadband upgrades by Openreach to Sydenham and West Wickham telephone exchange areas are currently in progress (each with 34% and 69% completion respectively, as of May 2025), including additional plans to upgrade Bromley Central and Beckenham telephone exchange areas. These remaining upgrades to the outstanding four telephone exchange areas are anticipated to be completed by Summer 2026 (with all nine areas completed albeit

<sup>33</sup> <https://www.bromley.gov.uk/downloads/download/421/economic-development-strategy>

the completion target specified by Openreach for full-fibre broadband coverage at each individual telephone exchange area is 75%- 80%).

2.120 Figures collected from September 2024 for the Connected Nations report<sup>34</sup> shows that 5G mobile network coverage has continued to increase in Bromley with 74.5% of premises having access to 5G networks available from all 4 Mobile Network Operators (MNOs), which is well above the 38% national coverage level. The 4G mobile network coverage by all MNOs in Bromley is essentially universal with 99.8% of premises supported.

### Summary of issues

- Bromley's local economy is healthy and resilient, with specific locational strengths relating to industrial land and Bromley Town Centre. Bromley has mid-sized office and industrial markets which perform relatively well compared to neighbouring boroughs and the wider Outer South London area.
- Vacancy rates are consistently below relevant benchmarks in relation to office, industrial and retail.
- PD rights have led to a significant loss of office stock, which has diminished the supply of office space and resulted in a lack of availability of higher quality, modern office stock.
- Retail centres are broadly well performing, with a range of centres at different scales providing services for residents, workers and visitors. However, Orpington Town Centre faces an ongoing challenge relating to significant out of centre retail in the Cray Valley area.
- Recent and ongoing planning reform could affect the retail uses within key commercial areas, due to increased flexibility to change to non-retail use.
- Digital connectivity in the borough is variable, with more rural areas seeing generally poorer coverage.

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<sup>34</sup> <https://www.ofcom.org.uk/phones-and-broadband/coverage-and-speeds/infrastructure-research>

## Environment

## Climate Change

2.121 Under the 2015 Paris climate agreement, 197 countries - including the UK - agreed to try to limit global temperature rises to 1.5C by 2100. To achieve this, CO<sub>2</sub> emissions need to fall by nearly half by 2030 and reach net zero by 2050, according to the UN's climate body, the IPCC.

2.122 The Climate Change Act 2008<sup>35</sup> is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are adapted to. The Act also establishes the framework to deliver on these requirements. The Act supports the UK's commitment to urgent international action to tackle climate change.

2.123 In October 2021, the UK Government published its Net Zero Strategy<sup>36</sup> setting out a pathway to reaching net zero greenhouse gas emissions by 2050. The interim target was to reduce carbon emissions by 68% by 2030 compared to 1990 levels. The strategy was subject to an independent review in 2022 and in September 2023 the commitment to zero carbon by 2050 was reconfirmed but some measures were amended<sup>37</sup>.

2.124 At the regional level, the Mayor of London has set out a vision that the city should become zero carbon by 2030, with energy efficient buildings, clean transport and clean energy.

2.125 Some of the actions include:

- making London's energy cleaner and more affordable
- working to reduce energy demand in buildings
- trialling innovative vehicle-to-grid technology with electric vehicles
- speeding up the pace of cutting carbon emissions
- cut fuel poverty by targeting energy efficiency to low-income homes
- providing funding to community energy projects.

## Greenhouse gas emissions in Bromley

2.126 The latest annual release of statistics on carbon emissions was published in June 2023 (revised July 2023). The National Atmospheric Emissions Inventory (NAEI) currently presents data in the Local Authority Greenhouse Gas Map from 2005 up to 2021<sup>38</sup>.

**Table 6: Bromley borough territorial greenhouse gas emissions by sector, 2021**

Sector	GHG emissions
Grand Total	1015.8
Industry Total	34.4
Industry Electricity	8.6
Industry Gas	4.6

<sup>35</sup> Climate Change Act 2008 <https://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>36</sup> Net Zero Strategy [Net Zero Strategy: Build Back Greener - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/net-zero-strategy)

<sup>37</sup> Prime Minister speech Sept 2023 [PM speech on Net Zero: 20 September 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/speeches/pm-speech-to-announce-net-zero-2035-target)

38 [UK Emissions Interactive Map](#)

Sector	GHG emissions
Industry 'Other'	21.2
Large Industrial Installations	0.1
<b>Commercial Total</b>	<b>69.3</b>
Commercial Electricity	46.2
Commercial Gas	22.5
Commercial 'Other'	0.5
<b>Public Sector Total</b>	<b>66.9</b>
Public Sector Electricity	20.8
Public Sector Gas	46.0
Public Sector 'Other'	0.0
<b>Domestic Total</b>	<b>521.4</b>
Domestic Electricity	110.7
Domestic Gas	403.5
Domestic 'Other'	7.1
<b>Transport Total</b>	<b>308.8</b>
Road Transport (A roads)	139.2
Road Transport (Motorways)	0.2
Road Transport (Minor roads)	163.7
Diesel Railways	1.3
Transport 'Other'	4.5
<b>LULUCF Net Emissions</b>	<b>-8.8</b>
Net Emissions: Forest land	-14.1
Net Emissions: Cropland	1.1
Net Emissions: Grassland	-2.2
Net Emissions: Wetlands	0.0
Net Emissions: Settlements	6.4
Net Emissions: Harvested Wood Products	0.0
Net Emissions: Indirect N <sub>2</sub> O	0.1
<b>Agriculture Total</b>	<b>6.9</b>
Agriculture Electricity	0.5

Sector	GHG emissions
Agriculture Gas	1.0
Agriculture 'Other'	1.7
Agriculture Livestock	2.3
Agriculture Soils	1.4
<b>Waste Management Total</b>	<b>17.0</b>
Landfill	6.9
Waste Management 'Other'	10.1

2.127 It is estimated that the “per capita” emissions for Bromley in 2021 were 3.1 kilo tonnes of CO<sub>2</sub> (based on the mid-year estimate of 329,800 population) and emissions have been reducing year-on-year. Using this methodology, more densely populated areas generally have lower emissions per person than rural areas and those with some types of industry. As an example, in the neighbouring authority of Sevenoaks (lower population and more undeveloped land) the “per capita” emissions in 2021 were 6.1 kilo tonnes of CO<sub>2</sub>. In Dartford, another neighbouring area with a smaller population but some significant industry, the figure was 5.7 kilo tonnes of CO<sub>2</sub>.

2.128 The data demonstrate that emissions from homes in terms of energy and heat, and emissions from transport are the most significant contributors. The positive benefits (elements which reduce greenhouse gas emissions) derive mostly from tree cover and grassland, highlighting the important contribution that green infrastructure makes in mitigating greenhouse gas emissions.

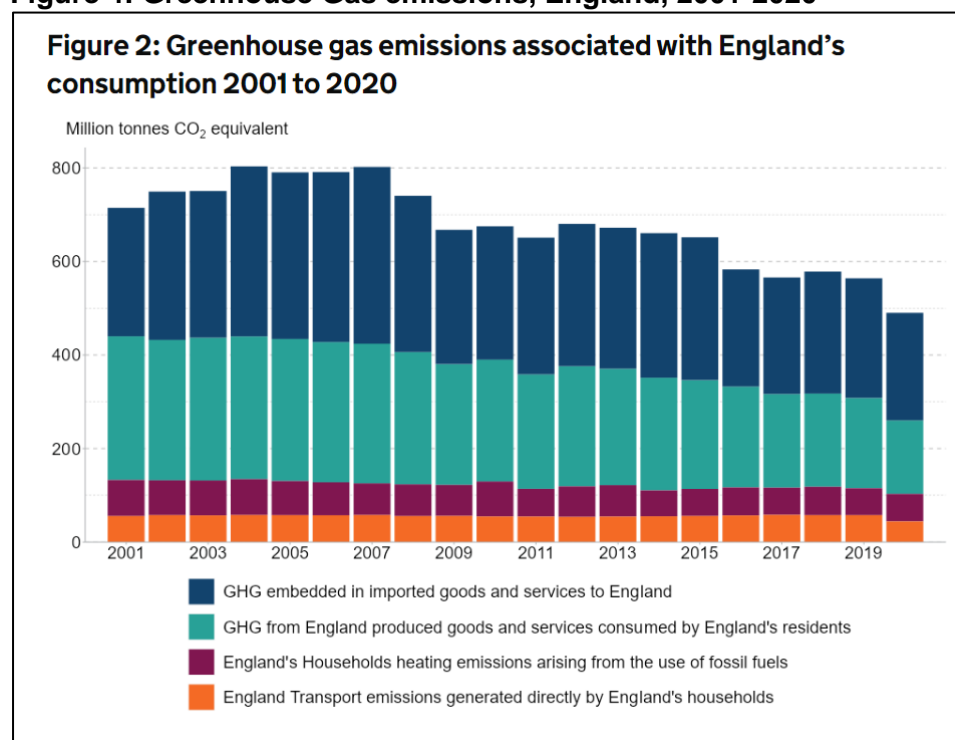
2.129 However, in addition to emissions produced within the borough itself, Bromley has a wider “carbon footprint” related to consumption. There are emissions produced by UK residents and businesses overseas, which form part of the UK’s Environmental Accounts, and then emissions produced through the supply chain of all goods and services consumed in the UK wherever they are produced in the world. The data is not available by local authority.

2.130 The most recent Government data for England<sup>39</sup> can be summarised as follows:

- Between 2019 and 2020, England’s carbon footprint is estimated to have fallen by 13 per cent. This decrease reflects decreases in emissions from transport direct by UK residents, a decrease in emissions from goods and services produced in the UK and decreases in emissions from imported goods.
- England’s carbon footprint peaked at 804 million tonnes CO<sub>2</sub>e in 2004 and in 2020 was 39 per cent lower than this.
- Greenhouse gas emissions relating to England’s imports rose 38 per cent from 2001 (when this data series began) to a peak in 2007 and in 2020 were 16 per cent lower than 2001.
- In 2020, emissions relating to the consumption of goods and services produced in England were 49 per cent lower than in 2001.
- The findings indicate that England’s carbon dioxide footprint fell by 12 per cent between 2019 and 2020.

<sup>39</sup> UK Government carbon footprint data [Carbon footprint for the UK and England to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/carbon-footprint-for-the-uk-and-england-to-2020)

**Figure 4: Greenhouse Gas emissions, England, 2001-2020**



## Greenhouse gas emissions from Bromley Council's assets and activities

2.131 In November 2023 Bromley Council reported on Year 4 of its "Net Zero" plan<sup>40</sup>. In July 2019 the Council agreed to achieve net zero carbon emissions within 10 years (2029). This target refers to direct organisational emissions only (i.e. those emissions directly within the Council's operational control, where the Council pays the energy bills). In February 2022, it was agreed the target was revised to 2027. The focus is on LED street lighting upgrades, energy efficiency upgrades to Council buildings, procurement of 100% renewable energy via a Purchase Power Agreement and various offsetting measures to removal residual emissions.

2.132 The Council's net zero emissions for year 4 (2022/23), in line with previous years assessment and reporting, totalled 3,133 tonnes CO<sub>2</sub>. This is a 14% reduction on year 3 (2021/22) and a 56% reduction on the baseline year of 2018/19. Year 4 continues to show a reduction in emissions. Most of these reductions were seen in business mileage, council owned fleet, streetlighting and paper usage. Water usage and waste produced show a slight increase, though this is still significantly below pre-Covid times.

## Energy generation and supply

2.133 The UK's energy supply is dominated by fossil fuels, which meet approximately 78% of its demand, according to Government data. This is mainly split between natural gas for heating and electricity, and petrol and diesel for transport<sup>41</sup>.

<sup>40</sup> Bromley Council Net Zero Year 4 report

<https://cds.bromley.gov.uk/documents/s50111837/LBBs%20Net%20Zero%20Carbon%20Action%20Plan%20Reporting%20Year%204.pdf>

<sup>41</sup> [Digest of UK Energy Statistics \(DUKES\) 2023 - GOV.UK](#)

- 2.134 The proportion of low-carbon sources of energy is increasing, particularly for electricity (where low-carbon sources accounted for 56% in 2022), but electricity only met around 18% of total energy demand in the UK in 2022. The role of electricity is expected to increase with the increasing adoption of technologies such as heat pumps for heating and electric vehicles in transport<sup>42</sup>.
- 2.135 The UK is a net importer of natural gas, with the majority coming from Norway, the US and Qatar. The UK is also a net importer of petroleum with the US and Norway the largest sources. The UK became a net exporter of electricity in 2022 for the first time in 40 years.
- 2.136 There are currently no energy generation plants in the borough but there is a network of substations and connecting infrastructure. UK Power Networks have a long-term plan to upgrade and improve the network across London as demand changes and renewable energy infrastructure is developed<sup>43</sup>.

### **Decentralised Energy**

- 2.137 There are no existing energy or heat networks in the Borough. The London Heat Map<sup>44</sup> identifies potential areas where the density of development could support networks, but these are currently relatively limited, with Bromley Town Centre offering the best opportunity. All major developments are required to demonstrate that they can connect to a network in the future.

### **Renewable energy**

- 2.138 There are currently no large-scale renewable energy generation or storage infrastructure installations in the Borough. New major development is expected to include renewable energy as part of the strategy to achieve zero carbon, most commonly photovoltaic (PV) panels and air source heat pumps. Some individual households have been installing PV panels and heat pumps.

### **Energy consumption**

- 2.139 The Department for Energy Security and Net Zero published their report "Energy consumption in the UK" in September 2024<sup>45</sup>. Final energy consumption in the UK decreased to a near record low of 125.0 million tonnes of oil equivalent (mtoe) in 2023, a 0.6 per cent fall on energy consumption in 2022. 2023 was the second lowest annual final energy consumption in the UK since 1970, behind only 2020 which was heavily impacted by the Covid-19 pandemic. Transport was the only sector to see a year-on-year increase in final energy consumption, up by 1.8 mtoe (3.6 per cent) to 52.6 mtoe. However, this was still lower than the energy consumption in transport in 2019 (56.3 mtoe), the last full year before the Covid-19 pandemic. All other sectors saw a decrease in energy consumption, with domestic showing the largest decrease (6.0 per cent) to 32.2 mtoe. This is likely due to the continuation of high temperatures and high energy and other prices in 2023. The industry sector decreased by 1.1 per cent to 20.4 mtoe and the services sector decreased by 1.3 per cent to 19.8 mtoe.

### **Fuel Poverty**

- 2.140 Fuel poverty relates to households that must spend a high proportion of their household income to keep their home at a reasonable temperature. Fuel poverty is affected by three key factors: a household's income, their fuel costs, and their energy consumption (which in turn

<sup>42</sup> [Digest of UK Energy Statistics \(DUKES\): electricity - GOV.UK](https://www.gov.uk/government/statistics/digest-of-uk-energy-statistics-dukess-electricity)

<sup>43</sup> <https://d1lf1oz5vvd9r.cloudfront.net/app/uploads/2024/12/DSO-Forward-Plan-2024.pdf>

<sup>44</sup> <https://apps.london.gov.uk/heatmap/>

<sup>45</sup> [Energy Consumption in the UK 2024](https://www.gov.uk/government/statistics/energy-consumption-in-the-uk-2024)



can be affected by the energy efficiency of the dwelling). The first fuel poverty strategy was introduced in 2001. The current fuel poverty target is to ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C, by 2030<sup>46</sup>.

2.141 The interim milestones are:

- as many fuel poor homes as is reasonably practicable to Band E by 2020
- as many fuel poor homes as is reasonably practicable to Band D by 2025

2.142 Trust for London assessed Fuel Poverty in 2021<sup>47</sup>. In Bromley 9.9% of households were in fuel poverty, with pockets of significantly higher fuel poverty in some areas, and notably over 20% of households in fuel poverty in two Lower Super Output Area (LSOA) in the Penge / Anerley Area. However, Bromley's figures are relatively low compared with the London-wide figures which show that more than 10% of households are in fuel poverty. Newham is the borough with the highest fuel poverty rate (17.8% of households).

## Energy Efficiency

2.143 An Energy Performance Certificate (EPC) provides information on the energy efficiency of a building. MHCLG statistics from 2024<sup>48</sup> set out an energy efficiency score for Bromley; a rating band from A to G is used to interpret this score, where A is very energy efficient, and G is very energy inefficient. Bromley's median score in 2024 was 66, which is within Band D. This score is the joint lowest of all London boroughs, alongside Bexley, Enfield and Havering. There are a number of reasons for this, namely the large proportion of older housing stock which was built before modern energy efficiency standards; and the greater number of detached and semi-detached homes which typically have lower EPC scores.

## Climate change adaptation

2.144 Climate change poses many challenges, including to Bromley. More unpredictable and extreme weather creates risks to health and wellbeing, flora, fauna, habitats and to the economy. Urban areas are particularly at risk of increased surface water flooding, pressure on water resources and overheating<sup>49</sup>.

2.145 The "London Climate Resilience Review" report (July 2024) report was commissioned by the Mayor of London to look at London's preparations for climate impacts and make recommendations<sup>50</sup>. It highlighted risks to the city's population, environment and economy and made recommendations to improve future resilience. While all London boroughs are different, some of these are applicable to Bromley and its residents and businesses.

### Summary of issues

- Per person carbon emissions are reducing but the carbon footprint of the Borough remains relatively high due to consumption of goods, services and transport.
- There are some areas and communities within the Borough which are fuel poor, although in general fuel poverty is lower than other London boroughs.
- Dwellings in Bromley score relatively poorly in terms of energy efficiency.

<sup>46</sup> [Fuel poverty in the UK - House of Commons Library \(parliament.uk\)](https://www.parliament.uk/library/research-and-briefing/paper/c1000000/fuel-poverty-in-the-uk/)

<sup>47</sup> [Fuel poverty rates | Trust for London](https://www.trustforlondon.org.uk/fuel-poverty-rates/)

<sup>48</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianenergyefficiencyscoreenglandandwales>

<sup>49</sup> [Climate adaptation | London City Hall](https://www.london.gov.uk/sites/default/files/2024-07/The_London_Climate_Resilience_Review_July_2024_FA.pdf)

<sup>50</sup> [https://www.london.gov.uk/sites/default/files/2024-07/The\\_London\\_Climate\\_Resilience\\_Review\\_July\\_2024\\_FA.pdf](https://www.london.gov.uk/sites/default/files/2024-07/The_London_Climate_Resilience_Review_July_2024_FA.pdf)

## Green infrastructure

2.146 The GLA commissioned a technical study in 2018 to find out how much open “green” and “blue” (water) space there was in London<sup>51</sup>. The green cover layer was created by combining classified near-infrared aerial imagery (NDVI) with land use datasets and resulted in a green cover estimate for London of between 48-51 percent. The study revealed that Bromley, with a total area of 15,013.49 ha, has a total green cover area of 10,262.64 ha, which is 68.36% of its area.

**Table 7: Bromley green and blue space, 2018**

	Area in hectares	% of total area
<b>Borough area total</b>	15013.49	100%
<b>Green cover area</b>	10262.64	68.36%
<b>Blue space area</b>	56.96	0.38%
<b>Blue and green space</b>	10319.6	68.74%

2.147 Bromley, according to this dataset, is shown to be the London borough with the greatest amount of green cover, followed by Havering and Hillingdon. Across the borough, there is considerable variation between wards, the denser urban areas contrasting with the suburban and urban-rural fringe.

2.148 Bromley’s green space comprises a wide range of land uses and habitats from open countryside with woodland hedgerows and farmland, large managed suburban parks to street trees verges and gardens. Some spaces are publicly accessible, others private, some are highly biodiverse, others not. The majority of green space in the Borough is afforded some level of protection, either through nature conservation legislation or through land use planning policy; this includes 7,660 ha of Green Belt and 667 ha of Metropolitan Open Land (MOL).

2.149 Part of the Kent Downs National Landscape falls within the borough boundary. These areas of countryside provide views across the Kent Downs and are considered to be of significant importance for their landscape beauty. An extension of the Surrey Hills National Landscape into Bromley is currently being considered<sup>52</sup>.

2.150 There are 6 Sites of Special Scientific Interest in the borough, 93 Sites of Importance for Nature Conservation (SINCs) and 5 Local Nature Reserves (LNRs) at Jubilee Country Park, Scadbury Park, High Elms Country Park, 'Darrick and Newstead Woods' and 'Hayes and Keston Common'.<sup>53</sup>

## Biodiversity

2.151 The Council adopted the latest Bromley Biodiversity Plan (BBP) in 2021<sup>54</sup>. It identifies the habitats of Principal Importance which are present within Bromley:

- Lowland Beech and Yew Woodland

<sup>51</sup> How Green is London? GLA Intelligence January 2019 <https://data.london.gov.uk/dataset/green-and-blue-cover>

<sup>52</sup> <https://consult.defra.gov.uk/ne-landscape-heritage-and-geodiversity-team/surrey-hills-boundary-variation-2nd-consultation/>

<sup>53</sup> [Home - Bromley Parks](#)

<sup>54</sup> Bromley Biodiversity Plan 2021 [bromley-biodiversity-plan](#)

- Lowland Mixed Deciduous Woodland
- Wet Woodland
- Wood-pasture and Parkland
- Traditional Orchards
- Hedgerows
- Lowland calcareous grassland
- Lowland dry acid grassland
- Lowland meadows
- Lowland heathland
- Ponds
- Rivers

2.152 Other important habitats in Bromley are Ancient and Veteran Trees, scrub, gardens and allotments, churchyards and cemeteries.

2.153 The BBP provides detailed guidance to ensure that biodiversity is comprehensively considered as part of the planning process. Species Action Plans (SAPs) provide further detailed guidance on the protection, conservation and enhancement of habitat for some of the important and declining species in Bromley, including swifts, bats (all species), dormouse, hedgehog, toad and white admiral butterfly.

### **Biodiversity Net Gain**

2.154 The Environment Act 2021<sup>55</sup> amends Section 40 of The Natural Environment and Rural Communities Act (2006) to include the requirement to *restore and enhance* species populations and habitats alongside conservation. There is a target to reverse the decline in species abundance by the end of 2030.

#### **Summary of issues**

- Although the Borough has a large area of green space, the development and management of land and human behaviour continue to impact biodiversity.
- There are additional benefits of the retention and enhancement of existing green areas - for the health and wellbeing of local communities, the mitigation of air pollution and climate change.
- There are opportunities to improve the quality of green and blue spaces and the networks of which they are part through specific projects, when development occurs and through effective use of financial contributions.
- Achieving biodiversity “net gain” – restoring and enhancing natural habitats - is relatively new and will require monitoring.

### **Air Quality**

2.155 Poor air quality is associated with a number of adverse health impacts, and it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The Chief Medical Officer’s report 2022 <sup>56</sup> stated that air pollution

<sup>55</sup> The Environment Act 2021 <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>56</sup> <https://www.gov.uk/government/publications/chief-medical-officers-annual-report-2022-air-pollution>

contributes to the death of between 26,000 and 38,000 a year in England, but in addition many people suffer avoidable chronic ill health as a result.

- 2.156 Part IV of the Environment Act and the UK's Air Quality Strategy 2023 (AQS) require local authorities to continually review the air quality within their administrative boundaries. The Environment Act places an obligation on local authorities to review and assess local air quality against objectives contained in the National Air Quality Strategy (NAQS) and associated Air Quality Regulations.
- 2.157 In accordance with the GLA Act 2007, the Mayor of London has also published guidance on technical and local issues, set out in the London Environment Strategy. The GLA has powers of direction over local authorities in relation to local air quality management including powers to require an assessment to be made and to declare Air Quality Management Areas (AQMAs). In addition, across London the GLA has declared Air Quality Focus Areas (AQFA) for locations where the EU annual mean limit value for NO<sub>2</sub> (Nitrogen dioxide) is exceeded and there is high human exposure. The GLA publish data and projections of air quality in the London Atmospheric Emissions Inventory (LAEI) for which the latest baseline is 2019<sup>57</sup>.
- 2.158 Bromley has declared an Air Quality Management Area across the whole borough and has published an Air Quality Action Plan (AQAP). It outlines the actions that will be taken to improve air quality from 2020 to 2025<sup>58</sup>. Two Air Quality Focus Areas have been declared: one in Bromley town centre and one in Elmers End.

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<sup>57</sup> [London Atmospheric Emissions Inventory \(LAEI\) 2019 - London Datastore](#)

<sup>58</sup> <https://www.bromley.gov.uk/downloads/file/1193/air-quality-action-plan-aqap-2020-25>

**Figure 5: Air Quality Focus Areas**



2.159 The main atmospheric pollutants of concern in Bromley are Nitrogen Dioxide (NO<sub>2</sub>) and PM<sub>10</sub> (breathable particulate matter) and PM<sub>2.5</sub> (able to pass into bloodstream). The main sources of these pollutants are traffic emissions, large scale combustion plant, construction sites and domestic heating.

2.160 Bromley has one operational monitoring station located at Harwood Avenue (Bromley Town), monitoring NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. Bromley carries out passive monitoring using NO<sub>2</sub> diffusion tubes at 32 locations in the borough. In addition, the council is supporting Breathe London with five monitors located at Beckenham Beacon Hospital, Bethlem Royal Hospital, Orpington Hospital, Poverest Allotment and Princess Royal Hospital.

2.161 The latest Air Quality Annual Monitoring Report sets out air quality data from 2023<sup>59</sup>. In summary:

- The borough's permanent continuous Air Quality Monitoring Station (AQMS) at Harwood Avenue did not exceed the annual or hourly mean for NO<sub>2</sub> in 2023, and demonstrated a further downward trend from 2022.
- There were no monitored exceedances of the annual mean for NO<sub>2</sub> at any of the diffusion tube network locations in 2023. All 32 locations demonstrated a further downward trend from 2022.
- There were no monitored exceedances of the annual or daily mean for Particulate Matter PM<sub>10</sub> in 2022, and there was a further downward trend compared to data from 2022.

2.162 The data suggests that there was a significant reduction in NO<sub>2</sub> concentrations during the Covid-19 pandemic restrictions in 2020. Since then, NO<sub>2</sub> concentrations have increased slightly from these low levels, however, they have not returned to pre-pandemic levels. Overall, NO<sub>2</sub> concentrations observed in 2023 demonstrated reductions across all sites. The longer-term trend from 2017 to 2023 shows NO<sub>2</sub> concentrations have reduced.

<sup>59</sup> [Air quality annual status reports – London Borough of Bromley](#)

2.163 Particulate matter is only recorded at the permanent monitoring station in Harwood Avenue. The annual mean for Particulate Matter PM<sub>2.5</sub> concentration in 2023 was 10.0µgm. This represents a decrease on figures from 2022.

2.164 In addition to monitoring data, progress towards the aims of the AQAP is set out in the annual report. The themes are:

- Monitoring and other core statutory duties
- Emissions from developments and buildings
- Public health and awareness raising
- Delivery servicing and freight
- Borough fleet
- Localised solutions
- Cleaner transport

#### **Summary of issues**

- Air quality is broadly improving but the health impacts of air pollution continue to be significant for vulnerable people.
- The borough still has an Air Quality Management Area (AQMA) and hot spots of concern in the Air Quality Focus Areas.
- Continued monitoring could help to ensure accurate trend data.
- There are multiple benefits from measures to improve air quality - for health and wellbeing, green infrastructure, carbon management and the quality of the public realm.

#### **Noise**

2.165 Noise pollution varies across the borough of Bromley, both in terms of level of nuisance and the noise source. Noise from traffic, commercial activity anti-social behaviour is experienced in residential areas, and some are affected by air transport<sup>60</sup>. Flights to and from Heathrow, Gatwick and London City airports cross the borough on a regular basis.

2.166 Activity to and from Biggin Hill airport is controlled by a lease agreement and monitored through a Noise Action Plan<sup>61</sup>.

#### **Summary of issues**

- Noise pollution from various sources, both temporary and ongoing, continues to be an issue.
- Noise from aircraft, including aircraft operating from Biggin Hill Airport, continues to be monitored.

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<sup>60</sup> <https://www.bromley.gov.uk/downloads/file/2408/noise-technical-guidance-planning-requirements-for-noise>

<sup>61</sup> <https://www.bromley.gov.uk/planning-policy/biggin-hill-airport/4>

## Waste management

- 2.167 The 25 Year Environment Plan 2018<sup>62</sup> sets out the UK government's long-term policy for improving the environment within a generation. It includes commitments to double resource productivity by 2050, reuse materials and to minimise and manage waste to reduce their impact on the environment.
- 2.168 The Resources and waste strategy 2018<sup>63</sup> sets out how the Government intend to preserve resources by minimising waste, promoting resource efficiency and moving towards a circular economy. It identifies five strategic ambitions:
- To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025;
  - To work towards eliminating food waste to landfill by 2030;
  - To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan;
  - To double resource productivity by 2050; and
  - To eliminate avoidable waste of all kinds by 2050.
- 2.169 The Waste Management Plan for England 2021<sup>64</sup> provides an overview of waste management in order to fulfil the requirements of the Waste (England and Wales) Regulations 2011. The objectives are to protect the environment and human health by preventing or reducing the generation of waste, the adverse impacts of the generation and management of waste, and by reducing overall impacts of resource use and improving the efficiency of such use. Changes to these requirements were made by the Waste (Circular Economy) (Amendment) Regulations 2020<sup>65</sup>.
- 2.170 The Waste Prevention Programme for England<sup>66</sup> articulates the actions for government and for others which will result in reduced waste arisings and increased resource efficiency.
- 2.171 The National Planning Policy for Waste 2014<sup>67</sup> alongside the NPPF, sets out the land use policies for the location and management of waste facilities and development management policies for decision making.
- 2.172 In England, the waste hierarchy (enshrined in law through the Waste (England and Wales) Regulations 2011)<sup>68</sup> ranks options for waste management and has evolved over time as approaches to more sustainable practices and opportunities for resource use have developed. Reducing waste is still the priority, with final disposal to landfill the last resort.

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<sup>62</sup> [CD1.H HM Government A Green Future Our 25 Year Plan to Improve the Environment.pdf \(publishing.service.gov.uk\)](#)

<sup>63</sup> [Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](#)

<sup>64</sup> [Waste Management Plan for England \(publishing.service.gov.uk\)](#)

<sup>65</sup> [The Waste \(Circular Economy\) \(Amendment\) Regulations 2020 \(legislation.gov.uk\)](#)

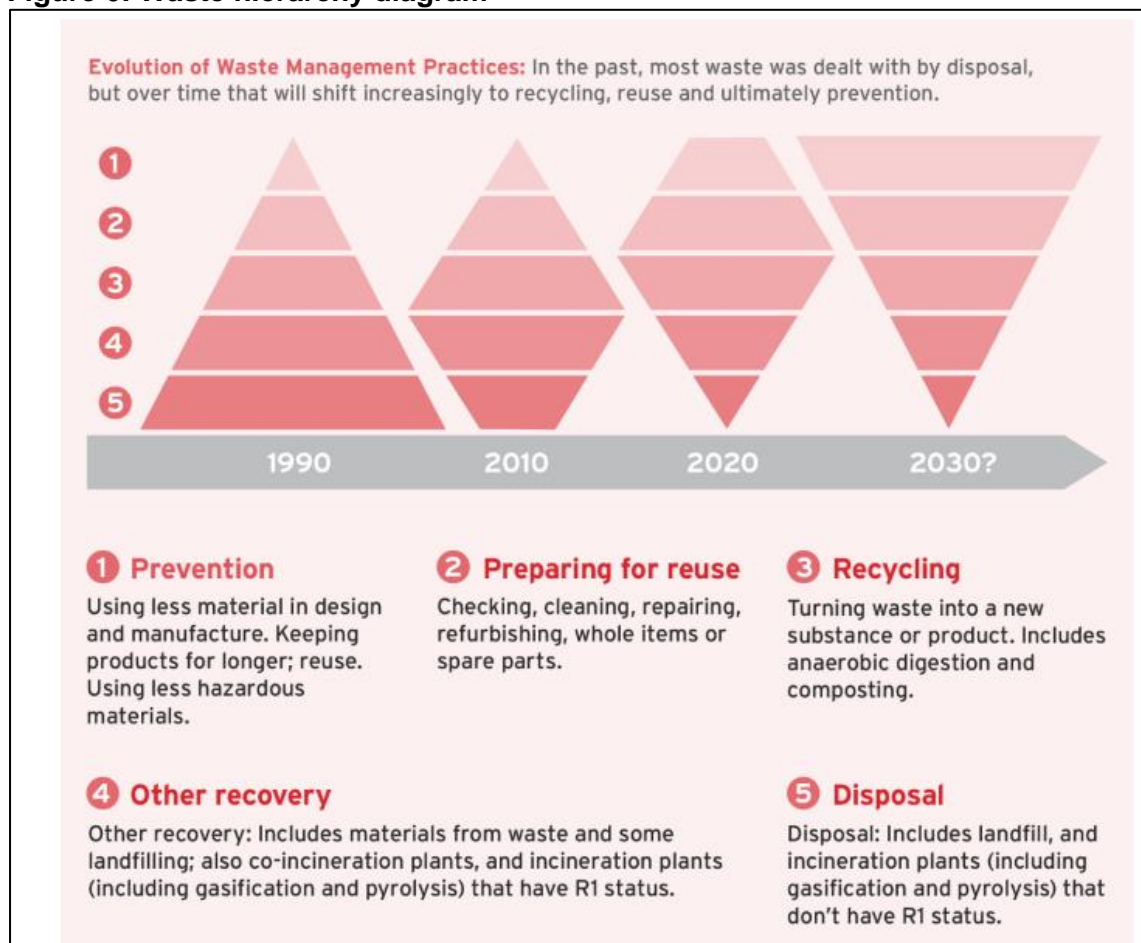
<sup>66</sup> [The waste prevention programme for England: Maximising Resources, Minimising Waste - GOV.UK \(www.gov.uk\)](#)

<sup>67</sup> [National planning policy for waste - GOV.UK \(www.gov.uk\)](#)

<sup>68</sup> [The Waste \(England and Wales\) Regulations 2011 \(legislation.gov.uk\)](#)



**Figure 6: Waste hierarchy diagram**



2.173 Chapter 7 of the London Environment Strategy 2018<sup>69</sup> sets out policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. The vision is for London to be a zero-waste city. The aim is that by 2026 no biodegradable or recyclable waste will be sent to landfill, and by 2030, 65 per cent of London's municipal waste will be recycled.

2.174 The Mayor of London's objectives are to:

- drive resource efficiency
- maximise recycling rates
- reduce the environmental impact of waste activities
- maximise local waste sites and ensure London has the infrastructure to manage all the waste it produces.

2.175 London Plan Chapter 9<sup>70</sup> Policy SI 7 "Reducing waste and supporting the circular economy" sets out how the waste hierarchy should be tackled as an integral part of planning new development, from the concept and design stage, materials and construction, use and management and its flexible re-use in the future – key to supporting a circular economy.

<sup>69</sup> <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy>

<sup>70</sup> <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-9-sustainable-infrastructure#policy-si-7-reducing-waste-and-supporting-the-circular-economy-168719-title>



Policy SI 8 “Waste capacity and net waste self-sufficiency” sets out the targets for boroughs to deal with the waste they produce within their own boundaries, as far as possible. Policy SI 9 “Safeguarded waste sites” expects that boroughs protect the capacity for waste management in their areas to help achieve greater self-sufficiency. In 2015, London managed 7.5mt of its own waste and exported 11.4mt of waste. London also imported 3.6mt of waste - waste net self-sufficiency figure of approximately 60%. Residual waste is exported largely to the southeast and east of England.

2.176 The London Plan expects a 95% reuse/recycling/recovery rate for construction and demolition and 95% of excavation waste to be put to beneficial use, with supporting paragraph 9.7.2 stating that *the adoption of circular economy principles in referable applications (and promoted in Local Plans) is expected to help London achieve the CD&E waste and material recovery targets early in the Plan period.*

2.177 The latest London Plan monitoring report relates to 2020/21<sup>71</sup> Key Performance Indicator 19 – Increase in municipal waste recycled or composted and elimination of waste to landfill by 2031. The AMR states that the target has not been met but there have been improvements. The proportion of waste that is recycled or composted has increased since the early 2000s but has plateaued over the last 9 years. The proportion of waste sent to landfill has decreased and is now less than 2 per cent. This part of the target is projected to be met.

2.178 Bromley Council has a waste contract with Veolia (8 years commencing 2019) to deal with waste disposal and household waste collections and recycling. The contract is linked to the obligations of its Reduction and Recycling Plan 2023-25 agreed with the Mayor of London<sup>72</sup>. The council offers household recycling collection of general waste, food, glass and plastic, paper and optional garden waste and bulky items.

2.179 Waste contractor Veolia’s Annual performance monitoring report 2022-23<sup>73</sup> states that they collected around 138,000 tonnes of recycling and waste from some 143,000 households and 600 local businesses. 62.7% of the waste delivered to the two Reuse and Recycling Centres (RRC) was sent for reuse and recycling. For the first time since the commencement of the contract, 0% of residual black sack waste was sent to landfill during 2022/23. Veolia’s report concludes that the Council now sends very little waste to landfill and therefore they exceeded the contractual target of 2% of residual waste sent to landfill for 2022/23. There was a 10% reduction in total residual waste treated compared with 2021/22. The non-recyclable waste continues to be sent to energy from waste facilities and used as refuse derived fuel to provide power for homes and businesses.

2.180 Government statistics 2022/23<sup>74</sup> show that Bromley continues to have the highest rate of household recycling of London boroughs at 48.7% of all household waste in the financial year 22/23, an increase from 45% in the previous year.

### **Bromley’s waste capacity**

2.181 Under London Plan Policy SI8 (Table 9.1) Bromley is assigned forecasted arisings of household, commercial and industrial waste by borough 2021-2041 of 249,000 and 267,000 tonnes, respectively. However, Bromley is *apportioned* in Table 9.2 to “manage” less than this – 192,000 and 204,000 tonnes. Waste is deemed to be managed in London if any of the following activities take place within London:

<sup>71</sup> [https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021\\_22%20%28final%29%20%281%29.pdf](https://www.london.gov.uk/sites/default/files/2024-05/AMR19%202021_22%20%28final%29%20%281%29.pdf)

<sup>72</sup> [Enc. 1 for REDUCTION AND RECYCLING PLAN 2023-2025.pdf](#)

<sup>73</sup> [Report No](#)

<sup>74</sup> [Local authority collected waste management - annual results 2022/23 - GOV.UK](#)

- waste is used for energy recovery
- the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum which is destined for energy recovery
- it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)
- it is reused or recycled (including anaerobic digestion).

2.182 It is permissible for boroughs to combine their apportionments, where this can be secured through mutual agreement and evidence. Since 2007, Bromley has worked with a group of southeast London boroughs, and the City of London to pool their apportionment targets. Some boroughs have greater capacity to manage waste and there are economic and environmental benefits, especially as contracts do not have to take account of borough boundaries. When each borough reviews its Local Plan, it reviews the collaborative Southeast Joint Waste Planning Technical Paper with assistance from the others, all updating their capacity and management situation. At the time of writing the latest iteration of The Paper was prepared by the London Borough of Bexley<sup>75</sup> and it is currently being updated by The City of London for their Local Plan review. Further revisions may be necessary for Bromley's Local Plan.

2.183 The three safeguarded waste management sites in Bromley which contribute to the strategic capacity of southeast London comprise two Council sites at Waldo Road in Bickley and Churchfields Road in Beckenham (at the time of writing Waldo Road is undergoing temporary refurbishment) and a privately managed green waste composting site on Cookham Road, St Mary Cray. Bromley has no landfill, energy generating or other final disposal facilities. Considering the surplus calculated in the last iteration of the Technical Paper, it is unlikely that the collective apportionment targets will not be met, but all data and sites will be reviewed as other boroughs can request to join to group.

#### Summary of issues

- Continued monitoring of waste flows is necessary to ensure the hierarchy is being followed.
- The impact of Bromley's waste management sites – noise, smell and traffic movements – needs to be monitored and managed.
- There are increased opportunities from the circular economy approach to reduce the production of waste and its movement, with both environmental and economic benefits.

### The water environment

2.184 Bromley lies within the Thames River Basin District and is covered generally by the Thames River Basin Management Plan and by two Catchment Flood Management Plans (CFMP) - the Thames CFMP3 and the North Kent Rivers CFMP4.

2.185 Two river catchments cover the London Borough of Bromley and largely form the eastern and western halves of the Borough. The western half encompasses a large proportion of the Ravensbourne catchment and the eastern half a section of the Darent and Cray catchment<sup>76</sup>.

2.186 One of the spring sources of the Ravensbourne is Caesar's Well, Keston, four miles south of Bromley town centre, from where it flows north through Bromley town centre, Beckenham Place Park and into Lewisham and Greenwich. The Kyd Brook (known as The Quaggy further downstream) rises in Locksbottom, near the PRUH hospital, and joins the Ravensbourne in

<sup>75</sup> [Joint Waste Planning Technical Paper](#)

<sup>76</sup> [Strategic Flood Risk Assessment Appendix A – London Borough of Bromley](#)

Lewisham. The River Beck rises along the border of Bromley and Croydon, flowing into Cator Park, where it is joined by the Chaffinch Brook. The river after this juncture is called the Pool River until it joins the River Ravensbourne. Through the Thames 21 restoration plan, Glassmill Pond in Bromley South has undergone significant works to improve the quality of the waterway and the function of the ponds<sup>77</sup>.

2.187 The River Cray is a chalk stream and the largest tributary of the River Darent. rising in in Priory Gardens, Orpington, The Cray flows through Scadbury Park north into Bexley, through Footh Cray meadows and meets the Darent in Dartford. Thames 21 has been coordinating restoration work along parts of the River Cray to address problems with pollution and to return the river to a more natural course.

## **Flood risk and mitigation**

2.188 Under the Flood and Water Management Act (FWMA, 2010)<sup>78</sup> the local authority (designated as a Lead Local Flood Authority (LLFA) has responsibilities including:

- Coordinating the management of flooding from surface water, ground water and ordinary watercourses;
- Developing, maintaining and implementing Flood Risk Management Strategies;
- Investigating and recording local flood events; and
- Establishing and maintaining a Flood Risk Asset Register.

2.189 Under the FWMA, Bromley Council has legal obligations under the EU Floods Directive, which was transposed into UK Law through the Flood Risk Regulations 2009. The regulations set out duties for the Environment Agency and LLFAs in the preparation of a range of studies and mapping outputs.

2.190 As a Lead Local Flood Authority, Bromley Council has produced a Local Flood Risk Management Strategy 2015<sup>79</sup> which sets out how it is responding to the identified flood risk across the Borough. It links to the strategies of Bexley, Lewisham and Greenwich, forming a partnership across the southeast London boroughs. The Preliminary Flood Risk Assessment was updated in 2017 (PFRA)<sup>80 81</sup>.

2.191 The 2017 Strategic Flood Risk Assessment (SFRA)<sup>82</sup> was prepared to inform the current Local Plan. It is being revised for the emerging new Local Plan. It details recent flood events in 2012 and 2013/14. Winter 2013/14 saw flooding in the Cray Valley which was due to a combination of groundwater, fluvial (ordinary watercourse) and pluvial sources. During this period there were reports of flooding in areas that had previously flooded during 2008, only on this occasion the floodwater had encroached into properties. Additionally, the 2011 Surface Water Management Plan (SWMP) reported several surface water flood incidents.

2.192 Fluvial flooding (flooding from rivers) is largely contained to the north of the Borough, in close proximity to the Beck, River Ravensbourne, Kyd Brook and the River Cray. There are several key tributaries associated with these watercourses, as well as a network of ordinary watercourses which all contribute to fluvial flood risk in the Borough. Three significant flooding

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<sup>77</sup> [Glassmill Pond and River Ravensbourne improvement project completed - Thames21](#)

<sup>78</sup> <https://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>79</sup> LLFMS <https://www.bromley.gov.uk/downloads/file/1199/local-flood-risk-management-strategy>

<sup>80</sup> PFRA <https://www.bromley.gov.uk/emergencies/preliminary-flood-risk-assessment-update-2017>

<sup>81</sup> PFRA update 2017

[https://assets.publishing.service.gov.uk/media/5acca61940f0b617df335697/PFRA\\_London\\_Borough\\_of\\_Bromley\\_2017.pdf](https://assets.publishing.service.gov.uk/media/5acca61940f0b617df335697/PFRA_London_Borough_of_Bromley_2017.pdf)

<sup>82</sup> <https://www.bromley.gov.uk/planning-policy/strategic-flood-risk-assessment>

incidents in which properties were affected were recorded on in 2019 and 2021. These were reported to the Borough Resilience Forum and the Environment Agency<sup>83</sup>.

2.193 Updated Flood Mapping for Surface Water (uFMfSW) is a requirement of the Flood Risk regulations 2009. The Surface Water Management Plan 2011 is currently being updated. A collaborative project is being developed across London to coordinate funding sources and priorities for cross-boundary surface water flooding mitigation and adaption. The London Surface Water Strategy draft report was published in July 2024<sup>84</sup> and a final report is expected in early 2025. It is based on a 'Strategic Solutions Hierarchy':

- 'Capture' rainfall where it lands through local sustainable drainage systems e.g. rain gardens, de-paving.
- 'Control' heavier rainfall through infrastructure interventions e.g. upgraded drainage infrastructure or de-culverted watercourses to divert flooding from at-risk locations.
- 'Adapt and Respond' – Londoners will be prepared, by the Strategy's actions, to adapt to very heavy rainfall that can't be 'captured' or 'controlled' e.g. temporary flood barriers and flood action planning.

#### Summary of issues

- Despite improvements resulting from projects in specific places along the river network in the borough, the river channels are often in culverts and can potentially increase the risk of flooding downstream.
- The number of flooding incidents have been relatively limited, but this emphasises the need to ensure that new development mitigates ongoing risk in future.

## Soil and geology

2.194 The London Plan Policy G9 and the SPG "London's Foundations" (2012)<sup>85</sup> set out the approach to protecting the geodiversity of the City as a whole. In a similar way to nature conservation designations, there are levels of importance attached to sites, and many coincide with sites of importance for biodiversity, such as Sites of Special Scientific Interest (SSSI's). Broadly, planning proposals should have regard to geodiversity in order to implement strategic and local policies. Sites should be protected, managed and enhanced and, where appropriate, new development should provide improvements to the geodiversity value of a site

2.195 There are both Regionally Important Geological Sites (RIGS) and Locally Important Geological Sites (LIGs) within the Borough. The RIGs include Keston Common, Crystal Palace "geological illustrations" and Chislehurst caves. LIGs include Bromley Palace Park and the Pulhamite rocks.

## Agriculture

2.196 Bromley has land of mixed grades of agricultural value<sup>86</sup>. The Agricultural Land Classification (ALC) system is used to categorise agricultural land into five grades, with Grade 1 being the highest quality and Grade 5 being the lowest. The system assesses factors such as soil quality, climate, and topography. The current use of the land does not affect its grade or

<sup>83</sup> [Public questions – Bromley Council Environment Committee, 16 March 2023 – Bromley Living Streets](#)

<sup>84</sup> [London's Surface Water Strategy | London City Hall](#)

<sup>85</sup> [London's Foundations | London City Hall](#)

<sup>86</sup> <https://magic.defra.gov.uk/MagicMap.html>

agricultural potential. 'Best and most versatile agricultural land' is divided into grades 1, 2 and 3a of the Agricultural Land Classification.

#### Summary of issues

- Particular areas of important geodiversity are protected and could be enhanced.
- The viability of farmland for food production in the borough faces pressure from other land use needs including housing and energy infrastructure.

### Minerals and aggregates

2.197 The NPPF 2024 sets out high-level policy to ensure that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods required. It acknowledges that they are a finite resource, can only be worked where they are found and that the best use should be made of them in the long term.

2.198 Although there are some deposits of useful minerals and aggregates within the Greater London area, and some existing quarry sites, the city is highly reliant on imported materials for construction projects. London Plan Policy SI10 sets out a strategy to increase the re-use and recycling of construction demolition and excavation waste but also to ensure an adequate supply of aggregates to support construction in London. Development Plans are required to make provision for the maintenance of a landbank of at least 5 million tonnes (i.e. seven years supply) of land-won aggregates until 2041.

2.199 Whilst all boroughs should safeguard deposits from development in case of future need, the main focus is on four boroughs – Havering, Hillingdon, Hounslow and Redbridge. The London Aggregates Working Party monitoring report 2023<sup>87</sup> states that, as of 31 December 2022, the reserves of sand and gravel in London are 2.29 million tonnes which equates to a landbank of 3.27 years this is below the minimum 7 year landbank required in the London Plan (at least 5mt). This is based on the 0.7mt per annum provision within the London Plan 2021.

2.200 Bromley does not have an apportionment for minerals or aggregates, but it does have deposits of Thanet sand.

#### Summary of issues

- Thanet sand deposits exist in the borough, although extraction of these deposits could have adverse environmental impacts.

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<sup>87</sup> <https://www.london.gov.uk/programmes-strategies/planning/who-we-work/planning-working-groups/london-aggregates-working-party>

## **Travel and transport**

2.201 Bromley's transport networks are related to the distribution of the population, with better access and choice in the more densely populated areas and access to public transport more limited in the rural areas.

2.202 There are good rail links into central London with fast services from the Kent coast and shorter metro lines beginning in Orpington, Beckenham Junction and Hayes. Biggin Hill has no rail links, and public transport is limited to bus services or private transport. The tram network through to Croydon and beyond begins at Beckenham Junction. Bus services are fairly widespread but more rural areas have limited routes and timetables.

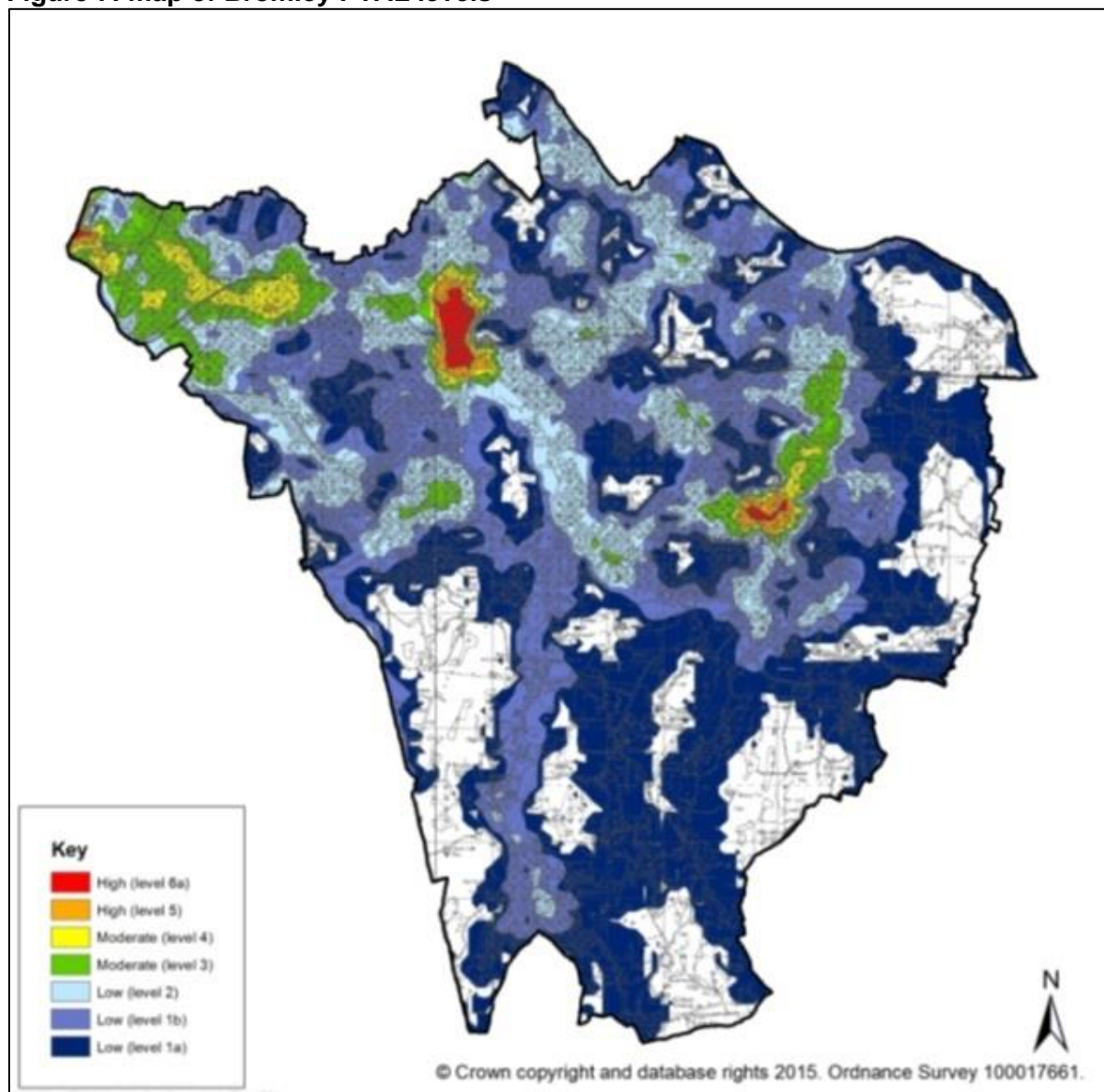
## **Accessibility**

2.203 The rail network is not currently fully accessible. Within the Borough there have been recent improvements to provide step free access to stations including Petts Wood and Shortlands. All Trams are fully accessible, and all TfL bus routes are served by low-floor vehicles, with a dedicated space for one wheelchair user and an access ramp. Buses can also be lowered to reduce the step up from the pavement and bus travel is free for wheelchair users.

2.204 With regard to other public transport at end destinations outside the Borough, around a quarter of Tube stations, half of Overground stations, all DLR stations and the Emirates Air Line all have step-free access. All taxis (black cabs) have a wheelchair ramp, and some private hire vehicles (minicabs) have step free access.



**Figure 7: map of Bromley PTAL levels**



## Private transport

2.205 2021 census data relating to car ownership and usage in the borough showed that Bromley has one of the highest car ownership levels in London, exceeding the Outer London average (77% and 68% respectively). There is a high dependency on the car by Bromley residents, highlighting the lack of accessibility in many areas of the Borough.

2.206 Department for Transport statistics from 2023 show that Bromley had 876 million vehicle miles travelled in the calendar year, the sixth highest amount of all London boroughs<sup>88</sup>.

## Walking, cycling and public transport

2.207 Walking, cycling and public transport offer a range of benefits for individuals and communities, including health benefits through promoting regular activity.

<sup>88</sup> [https://storage.googleapis.com/dft-statistics/road-traffic/downloads/data-gov-uk/local\\_authority\\_traffic.csv](https://storage.googleapis.com/dft-statistics/road-traffic/downloads/data-gov-uk/local_authority_traffic.csv)



2.208 The Council's 2019 Local Implementation Plan (LIP) 3<sup>89</sup> includes several Borough objectives which aim to improve choice across different modes of transport. This includes improvements to the local cycle network and priorities for improvements to public transport connectivity.

2.209 There are over 100 miles of cycle routes across the borough which have been installed to make it easier to cycle, and to encourage more people to do so. There are 12 designated routes, linking all town centres using mainly quiet roads and where possible off-road routes linking shops and other amenities.

2.210 Buses in Bromley have an average excess waiting time of 1.0 minute, lower than the average across all London bus routes (1.11 minutes), based on the latest statistics from Q2 2024<sup>90</sup>. While there is variance across routes, this indicates that delays to buses, for example due to congestion, are less than other boroughs.

2.211 Bromley South station is the busiest in the borough, ranking 50th in London and 79th nationally for station entries and exits, and 34th in terms of the number of interchanges, i.e. to change routes<sup>91</sup>.

#### Summary of issues

- There is generally good public transport accessibility in the denser urban areas in the borough, but there is limited provision in the more rural areas.
- Full accessibility to some railway stations is still a problem although there have been recent improvements with the installation of lifts.
- There is high car dependency particularly around and to and from areas with limited public transport; and high levels of vehicle movements.
- Overcrowding is an issue at local stations, particularly Bromley South which is one of the busiest stations in London and has a high level of interchanges from other routes which cross the borough.

<sup>89</sup> [local-implementation-plan-lip3-](#)

<sup>90</sup> <https://tfl.gov.uk/forms/14144.aspx>

<sup>91</sup> <https://dataportal.orr.gov.uk/statistics/usage/estimates-of-station-usage>

## Historic environment, heritage and character

2.212 In addition to the legislative planning framework, the historic environment is covered by a range of legislative provisions<sup>92</sup>.

2.213 There are currently 47 designated Conservation Areas in Bromley, each designated because of its special architectural or historic interest. Specific guidance for individual Conservation Areas has been produced to protect character and appearance and to ensure that change is managed in a sensitive way.

2.214 There are currently 421 statutory listed heritage assets<sup>93</sup> within Bromley. Of these, 8 are Grade I listed (buildings of exceptional interest), 24 are Grade II\* (particularly important buildings of more than special interest), and 389 are Grade II (buildings of special interest). Bromley has 5 Registered Parks and Gardens, which are designed landscapes assessed to be of particular significance.

2.215 Historic England's Heritage at Risk Register<sup>94</sup> identifies 24 individual assets within the Borough which are considered to be "at risk" for a number of reasons. These are most at risk of being lost as a result of neglect, decay or inappropriate development. Several of these exist on large sites, such as Biggin Hill airport and Crystal Palace Park. The identification of these structures and buildings can help secure their future and restoration by raising awareness and offering the opportunity to access funding.

2.216 There are a number of important archaeological sites in Bromley ranging from Crofton Roman Villa in Orpington to the remains of a moated Tudor mansion in Chislehurst; 9 sites are designated Scheduled Monuments, which are nationally important archaeological sites. The Local Plan identifies a number of areas which may have important archaeological remains surviving and Historic England has recently reviewed Bromley's archaeological priority areas<sup>95</sup>.

### Summary of issues

- Bromley has a rich historic landscape, and a strong architectural heritage reflected in a range of planning and other legislative protections.
- The importance and significance of character and heritage continues to be challenged by pressure for development.
- There are still listed and local heritage assets at risk, without clear plans for protection and improvement

<sup>92</sup> Primarily the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) which sets out the process for statutory listing and designation of Conservation Areas.

<sup>93</sup> Based on information from Historic England online search function -

<https://historicengland.org.uk/listing/the-list/advanced-search/>

<sup>94</sup> <https://historicengland.org.uk/advice/heritage-at-risk/>

<sup>95</sup> <https://www.bromley.gov.uk/downloads/file/622/archaeological-priority-area-review-bromley-july-2020>

# 3 IIA objectives

- 3.1 The information in section 2 provides a detailed baseline that sets out the current conditions in Bromley in relation to various issues, with a summary that identifies the key issues facing the borough. The IIA objectives have been derived from an analysis of the environmental, economic, social, health and equalities issues identified in the baseline information. These locally specific objectives describe the outcomes that the Local Plan should seek to achieve and will be used iteratively to check and refine the policies as the Local Plan develops.
- 3.2 The IIA objectives are as follows:
1. Improve the health and wellbeing of the local community.
  2. Promote social inclusion, equality, diversity and community cohesion.
  3. Promote sustainable patterns of development focussed on sites with good connectivity and accessibility, and encourage walking, cycling and public transport use.
  4. Support the provision of high-quality housing to meet identified needs, including affordable housing, whilst responding positively to local context and character.
  5. Protect and enhance the significance of heritage assets, improve the quality of the design of new buildings and respect local character.
  6. Manage, restore and enhance, and improve access to, local green infrastructure to benefit biodiversity, climate mitigation and adaptation and wellbeing.
  7. Improve air quality and other forms of pollution.
  8. Mitigate the impacts of climate change and improve resilience by supporting adaptation to a changing climate.
  9. Conserve water resources, improve the water environment and minimise pollution.
  10. Reduce flood risk and maximise opportunities for sustainable drainage.
  11. Implement the waste hierarchy by minimising waste and promoting the circular economy.
  12. Protect viable agricultural land, geological assets and aggregate deposits.
  13. Support economic growth and vibrant and viable town centres through provision of sufficient employment, retail and community space.
- 3.3 The Council has developed prompt questions for each IIA objective, to assist with the assessment of the impacts (positive, negative, neutral) of emerging policies and reasonable alternatives policy approaches.

**Table 8: IIA objective prompt questions**

IIA objective	Prompt questions
Improve the health and wellbeing of the local community.	<p>Do the policies encourage healthy lifestyles in general?</p> <p>Do policies improve access to essential community services, including facilities and opportunities for education and training?</p>
Promote social inclusion, equality, diversity and community cohesion.	Will the policies promote equity between population groups and those with protected characteristics?

IIA objective	Prompt questions
	Do the policies ensure appropriate, accessible infrastructure to support community cohesion?
Promote sustainable patterns of development focussed on sites with good connectivity and accessibility, and encourage walking, cycling and public transport use.	<p>Do policies direct development to the most sustainable locations?</p> <p>Do policies facilitate access by walking and cycling?</p> <p>Do policies support use of accessible public transport?</p>
Support the provision of high-quality housing to meet identified needs, including affordable housing, whilst responding positively to local context and character.	<p>Do the policies provide for a quantum and mix of housing that addresses identified needs, including affordable housing and homes for groups with specific requirements?</p> <p>Do the policies ensure that homes are of high quality and appropriate for the needs of the residents?</p> <p>Do policies enable existing homes to be brought up to higher standards – for example through improving energy efficiency?</p>
Protect and enhance the significance of heritage assets, improve the quality of the design of new buildings and respect local character.	<p>Do policies conserve and/or enhance heritage assets, their setting and the wider historic environment? Do policies contribute to the better management of heritage assets and contribute to conserving heritage at risk?</p> <p>Do policies promote high quality and contextually successful design, respecting maintaining and strengthening local character and distinctiveness?</p>
Manage, restore and enhance, and improve access to, local green infrastructure to benefit biodiversity, climate mitigation and adaptation and wellbeing.	<p>Do the policies support the protection and enhancement of green infrastructure?</p> <p>Do they help to reduce the impact of development on biodiversity?</p> <p>Do they improve access to green spaces for the health and wellbeing of local communities, the mitigation of air pollution and climate change?</p>
Improve air quality and other forms of pollution.	Do policies help to reduce pollution at source?

IIA objective	Prompt questions
	Do policies help new development to improve existing problems with pollution?
Mitigate the impacts of climate change and improve resilience by supporting adaptation to a changing climate.	<p>Will policies reduce carbon emissions from the construction of new buildings and their ongoing management?</p> <p>Will policies enable the improvement of the energy efficiency of existing buildings and help to reduce the carbon emissions of their users?</p> <p>Will policies encourage behaviour and choices that reduce energy use and carbon emissions, for example by supporting infrastructure for electric vehicles and public transport?</p> <p>Will the plan ensure the protection and enhancement of green infrastructure towards climate change mitigation?</p> <p>Will policies address the main risks of a changing climate - will they reduce surface water flooding, pressure on water resources and overheating on new and existing buildings and spaces?</p>
Conserve water resources, improve the water environment and minimise pollution.	<p>Do policies reduce the need for water usage and extraction from important water and wetland areas?</p> <p>Do policies encourage the improvement and enhancement of the quality of water courses and water bodies?</p> <p>Do policies reduce the risk of pollution to water courses and water bodies?</p>
Reduce flood risk and maximise opportunities for sustainable drainage.	<p>Will policies help to reduce the risk of flooding from various sources, including surface water, fluvial (river) and groundwater?</p> <p>Can policies increase the use of sustainable drainage infrastructure?</p>
Implement the waste hierarchy by minimising waste and promoting the circular economy.	Will policies help to reduce the production of waste, promote its reuse, recycling and minimise the need for disposal?
Protect viable agricultural land, geological assets and aggregate deposits.	Do the policies safeguard viable Thanet sand deposits?

IIA objective	Prompt questions
	<p>Do they provide adequate guidance for the restoration of existing sites?</p> <p>Do they adequately guide any potential new development opportunities?</p> <p>Do policies protect the most important agricultural land?</p>
Support economic growth and vibrant and viable town centres through provision of sufficient employment, retail and community space.	<p>Will policies help to protect adequate employment land, under pressure from other types of land use?</p> <p>Will policies strengthen the multiple benefits of town centres with their retail and community functions, particularly Orpington town centre?</p> <p>Can policies encourage the provision of new, high-quality and flexible office space to meet changing needs?</p>

3.4 Table 9 indicates the relationship between SEA issues (as set out in the SEA Regulations) and the identified IIA objectives.

**Table 9: relationship between IIA objectives and SEA issues**

SEA issues	IIA objectives
Biodiversity	6, 9, 10, 12
Population	1, 2, 3, 4, 6, 7, 8, 11, 13
Human health	1, 2, 3, 4, 7, 8
Fauna	6
Flora	6
Soil	6, 9, 12
Water	9, 10
Air	7
Climatic factors	8
Material assets	4, 5, 6, 11, 12, 13
Cultural heritage, including architectural and archaeological heritage;	5

SEA issues	IIA objectives
Landscape	6

- 3.5 It is recognised that there may be potential overlap and conflict between different IIA objectives and what they aim to achieve. The Council will be mindful of these conflicts when assessing the emerging policies against the IIA objectives and will clearly set out how they have been considered as part of the assessment of policies. This will help to balance the policy approach taken in the plan, or, where certain impacts cannot be prevented, it may help to determine appropriate mitigation relating to specific objectives.



# Appendices

## **Appendix 1: Strategic Environmental Assessment Regulations requirements checklist**

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage
<p><b>Preparation of environmental report (regulation 12)</b></p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>For Local Plans see <a href="#">here</a> and Stages A-C of this <a href="#">flowchart</a>.</p> <p>For neighbourhood plans see <a href="#">here</a> and Stages B-D of this <a href="#">flowchart</a>.</p>
<p><b>The information referred to in Schedule 2 is:</b></p> <p><b>a)</b> An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	<p>For Local Plans see Stage A of this <a href="#">flowchart</a>.</p> <p>For neighbourhood plans see Stage B of this <a href="#">flowchart</a>.</p>
<p><b>b)</b> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>For Local Plans see <a href="#">here</a> and Stage A of this <a href="#">flowchart</a>.</p> <p>For neighbourhood plans see <a href="#">here</a> and Stage B of this <a href="#">flowchart</a>.</p>
<p><b>c)</b> The environment characteristics of areas likely to be</p>	<p>For Local Plans see</p>

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage
significantly affected.	Stage A of this <a href="#">flowchart</a> . For neighbourhood plans see Stage B of this <a href="#">flowchart</a> .
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives <a href="#">2009/147/EC (Conservation of Wild Birds)</a> and <a href="#">92/43/EEC (Habitats Directive)</a> .	For Local Plans see Stage A of this <a href="#">flowchart</a> . For neighbourhood plans see Stage B of this <a href="#">flowchart</a> .
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	For Local Plans see Stages A and B of this <a href="#">flowchart</a> . For neighbourhood plans see Stage B of this <a href="#">flowchart</a> .
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	For Local Plans see Stage B of this <a href="#">flowchart</a> . For neighbourhood plans see Stage C of this <a href="#">flowchart</a> .
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	For Local Plans see <a href="#">here</a> and <a href="#">here</a> and Stage B of this <a href="#">flowchart</a> . For neighbourhood plans see <a href="#">here</a> and <a href="#">here</a> and Stage C of this <a href="#">flowchart</a> .
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical	For Local Plans see <a href="#">here</a> and <a href="#">here</a> and Stage B of this <a href="#">flowchart</a> .

<b>Strategic Environmental Assessment Regulations requirements checklist</b>	<b>Plan-making stage</b>
deficiencies or lack of know-how) encountered in compiling the required information.	For neighbourhood plans see <a href="#">here</a> and <a href="#">here</a> and Stage C of this <a href="#">flowchart</a> .
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	For Local Plans see Stage B of this <a href="#">flowchart</a> . For neighbourhood plans see Stage C of this <a href="#">flowchart</a> .
j) A non-technical summary of the information provided under the above headings.	For Local Plans see <a href="#">here</a> and Stage C of this <a href="#">flowchart</a> . For neighbourhood plans see <a href="#">here</a> and Stage D of this <a href="#">flowchart</a> .
<p><b>Consultation procedures (regulation 13)</b></p> <p>As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.</p>	For Local Plans see <a href="#">here</a> and <a href="#">here</a> and Stage A of this <a href="#">flowchart</a> . For neighbourhood plans see <a href="#">here</a> and <a href="#">here</a> and Stage E of this <a href="#">flowchart</a> .
<p><b>Information as to adoption of plan or programme (regulation 16)</b></p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> <li>• the plan or programme adopted</li> <li>• the environmental report</li> </ul>	For Local Plans see <a href="#">here</a> and Stage E of this <a href="#">flowchart</a> . For neighbourhood plans see <a href="#">here</a> and Stage F of this <a href="#">flowchart</a> .

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage
<ul style="list-style-type: none"> <li>• a statement summarising:           <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to:</p> <p>(i) the invitation referred to in regulation 13(2)(d);</p> <p>(ii) action taken by the responsible authority in accordance with regulation 13(4),</p> <p>have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other</p> <p>reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)</p> </li> </ul>	
<p><b>Monitoring of implementation of plans or programmes (regulation 17)</b></p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>For Local Plans see <a href="#">here</a> and Stage E of this <a href="#">flowchart</a>.</p> <p>For neighbourhood plans see <a href="#">here</a> and Stage F of this <a href="#">flowchart</a>.</p>

## **Appendix 2: Sustainability Appraisal process**

## Sustainability appraisal process

### Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework
5. Consult the consultation bodies on the scope of the sustainability appraisal report

### Stage B: Developing and refining alternatives and assessing effects

1. Test the Local Plan objectives against the sustainability appraisal framework
2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

### Stage C: Prepare the sustainability appraisal report

### Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public

### Stage E: Post adoption reporting and monitoring

1. Prepare and publish post-adoption statement
2. Monitor significant effects of implementing the Local Plan
3. Respond to adverse effects

## Local Plan preparation

### Evidence gathering and engagement

### Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

### Stage C: Prepare the publication version of the Local Plan

### Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public

### Submit draft Local Plan and supporting documents for independent examination

### Outcome of examination

Consider implications for SA/SEA compliance

### Local Plan Adopted

### Monitoring

Monitor and report on the implementation of the Local Plan



## Appendix 3: Relevant Plans, Policies and Programmes

International
European Directive 2001/42/EC
European Landscape Convention
Convention for the Protection of the Architectural Heritage of Europe
European Convention on the Protection of Archaeological Heritage
Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive)
National
Environmental Assessment of Plans and Programmes Regulations 2004
Planning and Compulsory Purchase Act 2004 as amended
Town and Country Planning Act 1990 as amended
National Planning Policy Framework 2024
Planning Practice Guidance
Planning (Listed Buildings and Conservative Areas) Act 1990 as amended
The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended
Localism Act 2011 as amended
Growth and Infrastructure Act 2013
Infrastructure Act 2015
Housing and Planning Act 2016
Use Classes Order 2020 as amended
The Town and Country Planning (General Permitted Development) (England) Order 2015 as amended
The Equality Act 2010
Planning Policy for Traveller Sites (PPTS) (2024)
Designing Gypsy and Traveller Sites Good Practice Guide (2008)
England's most disadvantaged groups: Gypsies, Travellers and Roma. Equality and Human Rights Commission 2016

Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health. The Traveller Movement 2016
Marmot Review 10 years on (2020)
Public Health England: Spatial Planning for Health 2017
Bromley Homelessness and Rough Sleeping Strategy 2025-2030
Planning for Sport Guidance 2019
The Environment Act 2021
HM Govt Net Zero Strategy – Building Back Greener, October 2021
Independent review Mission Zero, January 2023
Wildlife and Countryside Act 1981 (as amended)
The Conservation of Habitats and Species Regulations 2017
Natural Environment and Rural Communities Act 2006
The Environment Act 2021
Protection of Badgers Act 1992
Hedgerow Regulations 1997
The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023
Countryside and Rights of Way Act 2000
The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
National Flood and Coastal Erosion Risk Management Strategy for England 2020
Environment Agency's 'water stressed areas' report (2021)
Waste Management Plan for England 2021
National Waste Planning Policy 2014
National Design Guide 2021
National Model Design Code 2021
Building for a Healthy Life 2020
<b>Regional</b>
The London Plan 2021
The Mayor's Environment Strategy

GLA Strategic Housing Market Assessment 2017
GLA Strategic Housing Land Availability Assessment 2017
GLA Affordable housing and viability SPG 2017
GLA Draft affordable housing LPG May 2023
GLA Draft development viability LPG May 2023
GLA Draft large-scale purpose-built shared living LPG
GLA Characterisation and Growth Strategy LPG June 2023
GLA Optimising site capacity: A design-led approach LPG June 2023
GLA Small Site Design Codes LPG June 2023
GLA Housing Design Standards LPG June 2023
GLA Accessible London SPG 2014
Social Infrastructure SPG 2015
Play and Informal Recreation SPG 2012
The Mayor's Cultural Strategy 2010
London Industrial Land Supply Study and London Intensification and Co-Location Study 2023
Economic Development Strategy for London 2018
GLA Energy assessment guidance
Whole Life Carbon assessments LPG
Circular Economy assessments LPG
Thames River Basin District Flood Risk Management Plan 2021 to 2027 December 2022
Mayor's Transport Strategy 2018
London Gypsy Traveller Accommodation Needs Assessment (GTANA) – being prepared
Good Growth by Design: Connective Social Infrastructure: How London's Social Spaces and Networks Help Us Live Well Together
South East London Integrated Care Strategic Priorities for 2023-28
South East London ICS Estate Infrastructure Strategy Summary - Autumn 2023
<b>Local</b>
Bromley Local Plan 2019

Bromley Corporate Strategy 2021-2031
Bromley Regeneration Strategy 2020-2030
Bromley Economic Strategy 2021-2031
Bromley Planning Obligations SPD June 2022
Bromley Housing Strategy 2019-2029
Bromley Housing Delivery Test Action Plan 2022 (July 2024)
Bromley Housing Trajectory 2021
Bromley Loneliness Strategy
Bromley Local Football Facilities Plan
Bromley Playing Pitch & Outdoor Sports Strategy (PPOSS) – being prepared
Bromley Sport & Physical Activity Strategy
Bromley Education Commission Plan 2023
Bromley Local Implementation Plan 2019
Joint Strategic Needs Assessment
Bromley Air Quality Action Plan 2020-2025
Bromley Carbon Reduction Strategy
Bromley Zero Carbon report 2023
Bromley Biodiversity Action Plan 2021-2026
Kent Downs AONB management plan
Species Action Plans
Bromley open space strategy
Southeast London waste group technical paper – capacity study
Bromley Strategic Flood Risk Assessment – under review
Bromley Strategic Housing Market Assessment – under review
Bromley Local Implementation Plan
Bromley Urban Design Guide 2023
Orpington Town Centre SPD July 2023

Bromley Town Centre SPD 2023
Relevant conservation area appraisals and management plans

## Appendix 4: summary of consultation with Natural England, the Environment Agency and Historic England (Stage A5)

IIA comments	LBB response
<b>Environment Agency</b>	
<p>The IIA objective to ‘mitigate the impacts of climate change and improve resilience by supporting adaptation to a changing climate’ (Section 3) is noted.</p> <p>Encouraged that the scoping report references the ‘London climate resilience review report’ (2024) commissioned by the Mayor of London.</p>	Noted.
The report recognises the importance of the quality of green and blue spaces and identifies that there are opportunities to improve them through the planning system.	Noted.
<p>The IIA objective to ‘manage, restore and enhance, and improve access to, local green infrastructure to benefit biodiversity, climate mitigation and adaptation and wellbeing’ is noted.</p> <p>Acknowledges references Biodiversity Action Plan 2021 and BNG.</p>	Noted.
<p>Air quality – notes acknowledgment of AQMA. AQFA and AQAP</p> <p>Notes objectives to ‘improve air quality and other forms of pollution’; and ‘implement the waste hierarchy by minimising waste and promoting the circular economy’.</p>	Noted.
<p>The continued importance of strategic waste sites is noted.</p> <p>The impacts of waste sites in the borough need to be monitored and managed, there are increased opportunities from the circular economy approach to reduce the production of waste and its movement.</p>	Noted.
The objective to conserve water resources is noted.	Noted.
A holistic catchment- based approach is desirable, working with neighbouring boroughs.	Noted.
We would encourage the London Borough of Bromley to take action to improve water	Noted, will ensure that the IDP and SFRA are aware of these projects.

IIA comments	LBB response
<p>quality and the WFD status of waterbodies in the borough.</p> <p>Highlight WFD mitigation measures for watercourses within Bromley, contained within the Environment Agency's catchment planning system (CPS), which could be delivered via, or supported by, development.</p>	
<p>One of the climate change challenges in the borough is pressure on water resources,</p> <p>The EA supports the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption</p> <p>The EA's 'water stressed areas' report (2021) identifies Bromley as being in an area of serious water stress.</p>	<p>Noted. Reference added to report.</p>
<p>Objective to reduce flood risk noted.</p>	<p>Noted.</p>
<p>The report correctly identifies fluvial flooding locations and culverts. The SFRA is being revised. Modelling has been updated.</p> <p>The EA's River Cray catchment model has been significantly updated (2019) and the River Ravensbourne modelling is currently in the process of being updated (currently due for completion by summer 2025).</p> <p>The EA are also releasing new flood risk datasets, including updated Flood Zones, on our 'Flood map for planning' on 25 March 2025. To aid transition to the new data, EA released the updated Flood Zones to Local Planning Authorities (LPAs) and lead local flood authorities (LLFAs) on 11 March 2025.</p> <p>The local Flood Risk Management Strategy should be reviewed.</p>	<p>Noted. Will include in SFRA review.</p>
<p>The update of the Surface Water Management Plan is noted.</p> <p>SUDS are supported with caveats.</p>	<p>Noted.</p>
<p>Bromley is largely underlain by Principal Aquifers; in the northern section of the borough, these Principal Aquifers are overlain by Secondary Aquifers. These designations are important for strategic potable water supplies and local utilisation, including</p>	<p>Noted, will take into account in the SFRA review.</p>



IIA comments	LBB response
<p>interaction with watercourses and surface waters.</p> <p>A number of Source Protection Zones (SPZs) are also present within the borough. SPZs designate the most sensitive locations to land use activities and protection of potable water supplies.</p>	
<p>Pleased that the IIA scoping report includes reference to relevant international and national legislation, national and regional planning policies, guidance and evidence, including:</p> <ul style="list-style-type: none"> <li>• Government's '25 Year Environment Plan' (25YEP) (2018);</li> <li>• Environment Agency's Thames River Basin Management Plan (2022);</li> <li>• Environment Agency's Thames Catchment Flood Management Plan (CFMP) (2009) and North Kent Catchment Flood Management Plan (CMFP) (2009)</li> </ul>	Noted.
<b>Historic England</b>	
<p>In terms of the historic environment, on the whole, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the site allocations, that it has established an appropriate Baseline against which to assess the Plan's proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.</p>	Noted.
<p>Amend baseline information to add reference to significance.</p>	Amendments made.
<p>Amend Objective 5 to add reference to significance.</p>	Amendments made.
<p>Suggest that the prompt questions could go further than those set out in order to achieve a broader assessment of the likely effects of the draft Plan. Provide some examples of questions.</p>	Amendments made, combining some of the suggested examples.
<p>Consider that there are a number of additions that would further strengthen the SA in its assessment of likely effects on the historic environment.</p>	Added to the list of relevant plans policies and programmes

IIA comments	LBB response
<b>Natural England</b>	
A standard response was received including advice on Local Plans and Appendix A, 'General advice', which lists many sources of information.	Noted. Relevant plans, policies and programmes updated where relevant.