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Our ref: 15454/JF/TB/15075315v2
Your ref:

Dear Mr Banks

London Borough of Bromley: Local Plan Examination – Submission of written statement on behalf of LaSalle Investment Management

On behalf of our client, LaSalle Investment Management (LaSalle), which manages The Glades Shopping Centre, we enclose a written statement to the Planning Inspector in response to the Main Issues and Questions on the London Borough of Bromley's Proposed Submission Draft Local Plan. The written statement will provide a response to the following questions:

- 1 **Question 13:** Give further details on the relationship between the implementation of policies in the Local Plan and Bromley Town Centre Action Area Plan. Should any changes to the Action Area Plan which would result from the adoption of this Plan be explicitly stated on a schedule as an Appendix?
- 2 **Question 48:** Explain the methodology for the Local Green Space allocations in policy 56 and the selection of sites to be protected including Site 46, Bull Lane.
- 3 **Question 56:** Do policies 91 and 92 reflect paragraphs 23 and 161 of the NPPF in having carried out an up-to-date assessment of town centre uses and floorspace needs and made the appropriate allocations/designations?
- 4 **Question 57:** Policy 98. Are the criteria in the policy sufficiently clear to allow justified decisions on hot food takeaways, in respect of the overconcentration of such uses and the needs, health and wellbeing of local residents?

By way of background, LaSalle remains committed to The Glades to ensure that it remains competitive and contributes to a vibrant town centre that people and businesses choose to visit, live, work and invest in. LaSalle is currently considering its future intentions and investment strategy for the centre but it is important that the Local Plan promotes and recognises the important contribution that The Glades makes to the town centre. Importantly, there must be sufficient flexibility in the wording of policies within the Local Plan based on an appropriate evidence base to ensure that LaSalle can respond to changing shopping trends and respond to the changing face of the competition over the life of the Local Plan.

Question 13: Bromley Town Centre Action Area Plan

LaSalle supports the early review of the Bromley Town Centre Action Area Plan (BTCAAP) as set out in draft Policy 90 and considers that this will assist in meeting the Local Plan objectives for ensuring the vitality and diversity of town centres.

However, clarity on the inter-relationship between the BTCAAP and the Local Plan is essential. LaSalle is concerned that the current approach of amending some BTCAAP policies through the Local Plan process and deferring a thorough review could lead to piecemeal development within the town centre. For example, Local Plan Site 1: Bromley Civic Centre was originally allocated in the BTCAAP for 5,000sqm of leisure floorspace to replace that lost from the redevelopment of the Pavilion Site (BTCAAP Site E) which was allocated for 22,000sqm of retail floorspace. The Council has stated in the Summary of Responses (June 2017) that *“with the partial redevelopment of the pavilion leisure centre now complete (Bowling and soft play etc) this is now seen as separate to the Civic Centre. The relationship between the two sites will be reviewed as part of the AAP review.”* However, this then raises questions over the delivery of retail floorspace to meet the identified need within the town centre should The Pavilion site not come forward for any retail development. Accordingly, it is considered that amendments through the Local Plan could potentially undermine the delivery of the BTCAAP and the achievement of the Council’s vision if the implications are not positively planned for. In order to meet the identified need within the town centre, it is fundamentally important that the site allocations are made or reviewed in a joined up fashion.

Overall, LaSalle is concerned that the current approach may not be justified in terms of presenting the most appropriate strategy as required by NPPF paragraph 182. The approach has not formed a comprehensive review and as such the implications of changes to some site allocations has not been taken into account when assessing reasonable alternatives.

Question 48: Draft Policy 56 - Local Green Space allocations

We write in response to the proposed designation of Queens Gardens (Site 62) as Local Green Space. LaSalle recognises the importance of Local Green Space. However, it is considered important that the allocation does not cut across or contradict adopted policy within the BTCAAP Site M allocation and the introduction of cafés and restaurants around the edge of the Garden. Five restaurants on the southern edge of Queens Gardens have been built by virtue of planning permission ref. APP/G5180/A/12/2189178 and any subsequent designation should not compromise potential further investment consistent with the site allocation, such as along the western edge of the Gardens. Cross reference should therefore be made to the adopted site allocation to provide clarity.

Question 56: Draft Policies 91 and 92

LaSalle supports the identification in the supporting text to Policy 91 (para. 6.2.12) that the DTZ Retail, Office, Industry and Leisure Study (2012) will be subject to an early review. This is a critical process to ensure that the updated BTCAAP, and the site allocations within it, are based on an up to date evidence base in accordance with paragraph 158 of the NPPF and assesses the needs for floorspace for economic development including retail and leisure development (NPPF para. 161). Overall, this process will ensure that a suitable range of sites are allocated to meet the identified need and to promote a competitive town centre that provides customer choice in accordance with NPPF paragraph 23.

With respect to Policy 92, it is considered that the current policy wording could restrict the delivery of other main town centre uses within the primary and secondary frontage other than A1 use. This could have potential implications on the ability of the Council to respond to changing retailing trends likely to be reflected in the updated retail study and the potential delivery of existing and for new site allocations as part

of the updated BTCAAP, as required to comply with NPPF paragraphs 23 and 161. In particular, it is considered that the requirement for proposed changes of use away from A1 within the primary and secondary frontage to “*not harm the predominant retail character of the shopping frontage*” is not consistent with the NPPF as it could restrict the competitiveness of the town centre that limit customer choice and the retail offer contrary to NPPF paragraph 23. It is essential that the policy is flexible to support diversification of the town centre to maintain its competitiveness and to attract people into town centres. To provide this flexibility, it is considered that the policy should be supportive of diversification and consolidation of retail floorspace, especially in cases where units are vacant. Moreover, an additional criterion should be added which requires the Council to assess evidence on the demand for retail floorspace and floorspace for other main town centre uses when making decisions on changes away from A1 retail use. This additional criterion would ensure the policy is positively prepared to respond to changes in economic circumstances (NPPF para. 21) and the conclusions of the updated retail study.

Question 57: Draft Policy 98

Town centres are facing increasing competition from internet shopping and accordingly need to enhance their offer to become a vibrant shopping and leisure destination through a greater diversity of use that will attract people to the town centre. Restaurant uses form an important part of this diversification and will strengthen the evening economy to attract visitors beyond the core shopping hours. Accordingly, LaSalle supports the intention of the policy to encourage food and drink uses and the recognition within the supporting text (para. 6.2.28) of the contribution that these uses can make in creating a vibrant town centre and shopping area.

Most restaurant uses, particularly those encouraged within the town centre, need to cluster together to ensure their viability. Restaurants are recognised in the NPPF as a main town centre use and NPPF paragraph 23 states that planning policies should be positive and promote competitive town centre environments that provide customer choice. In considering Question 57 and the proposed policy criteria in the context of hot food takeaways, it is essential that the policy does not inadvertently constrain restaurant uses within the town centre. A policy that restricts restaurant use within the town centre would not be consistent with national policy and the resultant policy would be unsound as per NPPF para 182.

We note that the Council is proposing a modification to explain that “*over concentration of these uses related to where/when there would be negative impacts due to the unacceptable concentration of such uses. i.e. impact on vitality and viability, noise, fumes, traffic etc.*” However, it is considered that greater clarity should be provided on the definition of ‘over concentration’ within the policy and how this would be monitored to provide certainty for future proposals, particularly for future restaurant use.

We trust the Inspector will take the above into account alongside our previous representations submitted in December 2016. Should you have any questions or require additional information, please do not hesitate to contact me or my colleague Victoria Barrett.

Yours sincerely



Pauline Roberts
Planning Director