



THE BECKENHAM SOCIETY

Your Local Civic Society

Member of Civic Voice and the London Forum of Amenity Societies

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BROMLEY LOCAL DEVELOPMENT PLAN NOVEMBER 2016: EXAMINATION ISSUE 2

Statement on behalf of The Beckenham Society by:

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INTRODUCTION

The Beckenham Society (TBS) is mainly concerned with the Beckenham (BR3 postal area) district of Bromley, save where policies might also affect the whole Borough. The comments are largely based on those submitted to the London Borough of Bromley on 29th October 2015. They now focus on Chapter 1, Section 1.3 of the Bromley Local Development Plan (BLDP) – Vision and Objectives.

At the outset we must state that the absence of normal written index makes understanding the document difficult, despite the search facility. For those without access, or not computer literate it must be impossible, a change is therefore needed in any future paper version. **This should be remedied by the BLDP Examination**

VISION AND OBJECTIVES

Open Space and Natural Environment: The BLDP is very concerned with housing, to cater for additional population. Related issues, such as green infrastructure, are unfortunately not given enough priority. The Green Belt, Metropolitan Open Land and Urban Open Space, would thus be subject to much greater risks.

Bromley prides itself on being known as London's greenest borough, and this is reflected in Beckenham's Coat of Arms, and the related Shield of Beckenham (above). However, if all the developments shown in the BLDP were to occur, the Shield's horse chestnut trees could become 'ashes'.

Apart from the Local Green Spaces, no major proposals for new green urban spaces or street tree planting appear in the BLDP, only speculative words. In the past the Council actually resisted local Society proposals for Beckenham Green and Elmers End Green to be registered as Town Greens under the Localism Act (2011). This is just one example of the Council's actions not always being consistent with its stated vision. Thankfully, after continuing public efforts (largely by TBS), Beckenham Green is now proposed as a Local Green Space; unfortunately Elmers End is not. **This should be remedied by the BLDP Examination**, to exhibit some pro-active vision.

Sites of importance for 'urban conservation' should also include Crystal Palace Park, Croydon Road Recreation Ground, Beckenham Crematorium/Cemetery, and the River Ravensbourne and River Beck. Neither river is mentioned anywhere in the BLDP! **This should be remedied by the BLDP Examination.**

Business, Employment and the Local Economy: The future of office space in Beckenham is not specifically mentioned, other than by the generic words "*business premises*". The recent rapid conversion of offices to residential in local District Centres and shopping parades is contrary to the Council's aim of creating employment opportunities "*across the borough*". An initiative is needed for the new residential population to be matched with new local employment. **This should be remedied by the BLDP Examination.**

Town Centres: In the February 2014 version of the BLDP Beckenham, the Borough's largest District Centre, was selected for a small office cluster, but not in the revised 2016 version. Unfortunately, in the past few years it has lost, to residential development, most of its major office buildings and many of its vital small service offices. We do not include estate agents in this category; they and restaurants are booming and both are replacing small shops. The former offices provided an essential ingredient to the social and economic vitality of Beckenham High Street during shopping hours, but now it is in danger of having to rely on its night time activity. We cannot see any proactive policies in the proposed BLDP to counter these regrettable changes. The Borough's District and Neighbourhood Centres, and local shopping parades, will not be "*maintained and enhanced*" by loss of all their offices – especially those serving a local function, e.g. solicitors, accountants etc. **This should**

be remedied by the BLDP Examination. At the same time, a policy curtailing further expansion of restaurants and estate agents should be recommended.

Built Heritage: A vital element of our urban environment is 'Cultural Heritage'; however the words do not appear in the BLDP. **This should be remedied by the BLDP Examination.** It applies particularly to the uses to which heritage buildings are put. The latter is relevant regarding closure of the former Orpington Heritage Museum. It was closed by the Council and its contents now lie in storage. This was an 'Asset of Community Value' that should be reopened somewhere else. Possibly this could be in Beckenham's former public toilet building, that the Council owns, or perhaps in an underused space, rented by the Council, within another heritage building such as one of the halls of Beckenham's Christ Church.

We are surprised that there is not a list of conservation areas contained in the BLDP Appendices. This was always the practice in previous Development Plans. **This should be remedied by the BLDP Examination.**

Transport: The objective of encouraging people to walk would be best served by redressing the balance between wheeled traffic and the most intensively used pedestrian routes. This should be related to slower road traffic speeds (via 20 mph zones). Other physical elements must include improving the environment of footways, especially in shopping streets. A longer term policy, applying throughout the Borough, for wider footways, attractive paving, shade trees and more pedestrian crossings is needed. This especially calls for the removal of the all too generous vehicle turning radii at the mouths of so many side road junctions which dangerously plague so much of Bromley in general. **This should be remedied by the BLDP Examination.**

Parking of vehicles is raising great concern throughout the Borough, especially the number of vehicles left on-street, all adding to congestion and accidents. Car ownership seems likely to continue increasing, therefore a new pro-active planning policy, is needed. **This should be remedied by the BLDP Examination.**

Public transport provision in Beckenham is very good however new planning policies are needed in the BLDP that encourage more travellers to use it. One way might be to maximise residential densities near stations and improve transport interchange facilities. Main walking routes should also be improved as per the suggestions set out above. **This should be remedied by the BLDP Examination.**

Health and Wellbeing, Homes, Design and the Public Realm, Environmental Challenges: The Society largely agrees with the main thrust of the BLDP planning policies on these issues. This is subject to all the points made on the other issues discussed earlier in our Statement that may be relevant.

OTHER ISSUES

Neighbourhood Plans: Yes this is probably a surprise, especially to the planning officers, because they have made only a very brief mention of the subject in paragraph 5.2.32 of the BLDP! However our Society regards it as potentially one of the most important issues because, like the Local Green Spaces exercise, it offers a real opportunity for the public to actually become involved in proposed local plans.

In our October 2015 consultation comments we mentioned the importance of the Localism Act (2011), and the section on the rights and powers of the community via Neighbourhood Plans. Local councils are supposed to *“produce Development Plans that set the strategic context within which Neighbourhood Development Plans will sit”*. We are therefore particularly disappointed to note that there appears to be no attempt in the BLDP to proactively encourage Neighbourhood Plans as provided for by the 2011 Act. The Society is very keen to be a part of such proposals as are other local societies, via the Beckenham Town Centre Team.

However, without the help of professional consultants, Neighbourhood Plans present a daunting task for amateurs. That is probably why so few have been completed in the UK. We therefore recommend that the Council appoints a project officer, with expertise in the subject, to encourage, guide and hopefully assist in the task. **This should be remedied by the BLDP Examination.**

CONCLUSION

The Society is very pleased to have had a second opportunity to influence this new Local Plan for Bromley and welcomes this occasion to clarify its earlier submission.

Dr John Parker

3rd December 2017

