

## Hearing Statements

### Bromley Civic Society (BCS, 181)

1. **Issue 4:** *Are the main areas for growth properly defined, do they positively promote the spatial vision and objectives for Bromley and are the expectations for growth justified and deliverable?*
  2. **Question 14:** *What is the rationale for the selection of the 3 economic growth areas of Biggin Hill, Cray Business Corridor and Bromley Town Centre, including significant housing growth in Bromley Town Centre?* (relates to BCS Representation no. 181\_7. (comment ID 151))
  3. Draft Policy 90, Bromley Town Centre Opportunity Area proposes a minimum target figure of 2,500 homes for the Opportunity Area. We believe this to be too crude a target – the real number of homes actually achieved will be somewhat lower as proposals come forward and are properly assessed for their impact on environmental quality, heritage assets and general vitality. This is particularly so in the case of Sites 1, 2, 3 and 10 listed in Appendix 10.2 of the Draft Local Plan which, together, are expected to account for 1975.
  4. Closer examination of the characteristics of these sites (see under Qu 20 below) demonstrate that the target figures are unlikely to be achieved without causing significant harm
  5. **Answer to Issue 4:** whilst it is accepted that the areas of growth may be properly defined BCS consider the expectations of growth to be overstated and therefore not justified or deliverable. .
  6. **Answer to Qu 14:** the rationale of the selection of Bromley Town centre is accepted but it is unachievable within the plan period without causing significant harm to heritage assets and to local environmental quality.
  7. **Suggested Recommendation:** That a caveat is made in Draft Policy 90 to the effect that the overall target figures for Bromley Town Centre be made subject to proper assessment of the impacts on environmental quality, heritage assets and general vitality of the town centre.
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8. **Issue 5:** *Are the policies for housing growth and affordable housing justified, deliverable and consistent with national policy?*
  9. **Question 19:** *Given the matrix in Table 3.2 of the London Plan, has the Council made reasonable assumptions about the housing densities that can be reasonably be achieved on development sites, especially when Outer London Boroughs are encouraged to increase densities?*  
(relates to BCS Representation nos 181\_3, 181\_4, 181\_5, 181\_6 & 181\_8)
  10. BCS contend that the minimum average of 641 additional homes per annum is not deliverable or consistent with national policy. Realistic assessments of the capacities of sites in Bromley town centre have not been carried out and there are considerable doubts whether development on the scale envisaged can be achieved. There is likely to be an early shortfall in the target and a risk of the shortfall being exploited by those promoting development on unallocated sites and policy protected areas such as Green Belt, Metropolitan Open Land, Urban Open Space and in areas where local residential character could be harmed.
  11. The housing target depends on the assessments made during the preparation of the Strategic Housing Land Availability Assessment when crude estimates of density were made without due regard to local heritage assets. It is unfortunate that over estimates of capacity given at that stage have led to an overestimate of the achievable housing target for Bromley as a whole.
  12. The result is that proposals in the Green Belt and other protected areas that have long been resisted are now emerging again, with owners and developers seeking to take advantage of the potential shortfall and use it as justification for development. This is evidenced by the number of Reg 20 Representations that request omissions from the Green Belt (thirteen), from Metropolitan Open Land (three) and from Urban Open Space (one) to enable development. These representations refer to the likelihood of a shortfall of the housing target in Bromley town centre. Whilst many of those proposals will continue to be resisted, the result is likely to be a long sequence of planning appeals, hearings, inquiries, and general uncertainty for the foreseeable future.
  13. In short, too high a target figure puts the Green Belt and a range of other policies at risk.
  14. **Answer to Issue 5:** The policies for housing are not deliverable.
  15. **Answer to Qu 19:** BCS consider that the Council have not taken into account important factors, in particular impacts on heritage assets, when making assumptions about the housing densities that can be achieved on development sites in the town centre.
  16. **A suggested modification** is to insert a caveat into Draft Policy H1 referring to the target on individual sites being subject to proper assessment of impacts on environmental quality, heritage assets and vitality.
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17. **Question 20):** *Are the sites identified for housing supply deliverable and developable in accordance with paragraph 47 of the NPPF?*  
(relates to BCS Representation nos 181\_3, 181\_4, 181\_5, 181\_6 & 181\_8)
18. **Site 1- Bromley Civic Centre**  
The site is the residue of land belonging to Bromley Palace and arguably the most historically significant site in the Town Centre and the Borough. It is the setting of six Grade II listed buildings and has a documented history as the Bishop of Rochester's Palace going back a1000 years or more.
19. BCS consider that the significance of the site has not been taken sufficiently into account in these proposals which appear to be arbitrarily based on achieving a target number of housing units. Housing at the quantum proposed will seriously harm the setting of heritage assets.
20. We would expect any proposals to consider:
- retaining the Palace in the public domain;
  - demolition of the 1930s wings and a separation of new development so as to bring about an improvement in the setting of the listed Palace; and
  - restoration of the historic landscape and restoring the historic linkage of the listed Folly beside Rafford Way and the main body of the Park and the other 5 listed buildings;
21. Detailed assessments of environmental quality, heritage assets and feasibility should be carried out as before any development takes place.
22. **Answer to Qu 20):** If the impact and possible improvement of heritage assets are properly taken into account then it is unlikely that the target figure of 70 units could be delivered on Site 1
23. **A suggested modification** is to include the following into the Site Policy for Site 1:
- The Palace will be retained for public use.
  - New development will be separate from the Palace and will enable the improvement of its setting.
  - The historic linkage of the listed Folly beside Rafford Way and the main body of the Park and the other 5 listed buildings will be restored.
  - No permissions granted and no development to take place before a proper assessment of the significance of heritage assets on the site takes place.
24. Both the Friends of Bromley Town Parks and Bromley Civic Society would be willing to seek, for instance, Heritage Lottery funding in partnership with the Council for restoration of the historic setting of the Palace.

**25. Site 2 - Land adjacent to Bromley North Station**

The proposed target figures of 525 residential units, 2000sqm of office accommodation, together with transport interchange, community uses and parking are unrealistic and unachievable and would result in an unacceptable mass and bulk of building harmful to the setting of the Grade II listed Station and will adversely affect the setting and views within and from the adjacent Conservation Area.

26. One proposal that is emerging on part of Site 2 envisages a 21 storey building on a small part of the site. It demonstrates how a developer can take advantage of an unrealistic target and 'go over the top' in terms of proposing an unsustainable development on part of the site. If that development were to proceed then none of the benefits of 'improved transport interchange' would be achieved and it is likely to lead to excessively high numbers for the site as a whole. It points to the dangers of piecemeal development on allocated sites in the absence of a masterplan.

27. Development should be governed by a masterplan for the whole of Site 2 that could properly assess impacts on environmental quality, heritage assets and local vitality. In addition there should be viability testing to examine the feasibility of achieving the benefits envisaged arising from the development of the site as a whole.

28. **Answer to Qu 20):** If the impact the local environment and on heritage assets is properly taken into account then it is unlikely that the target figure of 525 units could be delivered on Site 2.

29. **A suggested modification** would be to include in the Site Policy for Site 2 the following:

- No permissions granted and no development to take place before a Masterplan for the site is consulted upon and agreed by Council. The masterplan should take into account impacts of environmental quality, heritage assets and local vitality and should be shown to be financially viable across the site as a whole.

**30. Site 3 – Hill Car Park and Adjacent Lands,**

Site 3 is part within and wholly surrounded by the Town Centre Conservation Area. The proposals are for 150sqm of new retail space, car parking and 150 residential units. Whilst the locally listed Cinema building is referred to in the Site Policy, the inference is that the cinema use will be extinguished in favour of housing.

31. Planning permission has recently been granted for the re-use and extension of the cinema building to form an additional auditorium and a café as a 'Picturehouse' part of the Cineworld chain. BCS welcome the proposal and it indicates that the future use of the cinema is assured. It means however that the boundaries of Site 3 need to be adjusted so as to exclude the cinema building.

32. The figure of 150 units should also be reduced accordingly and proper assessments carried out to measure the impacts on heritage assets, in particular, the Conservation Area, as well as local environmental quality and vitality.
33. **Answer to Qu 20:** the figure of 150 units is unlikely to be achieved on Site 3.
34. **A suggested modification** would be to amend the boundary of Site 3 to exclude the cinema building; also to include with the Site Policy for Site 3 the following:
- Development be confined to the Hill Car Park 4. Given the sensitivity of the site, the scale of any proposed development should be based on an assessment of the impact of the development on the character of its surroundings and the retention of important views into and within the conservation
35. **Site 10 – West of Bromley High Street and Bromley South Station**  
There are no massing studies, viability assessments, feasibility or environmental studies that demonstrate how a sustainable development of 1230 dwellings can be achieved. BCS believe that there are significant issues of site assembly, and loss of good quality housing that will present insuperable difficulties.
36. Development of that scale cannot be achieved without causing harm to the local vitality of the High Street. As a result, there will be blight and uncertainty in a large part of the town centre for the foreseeable future and any development is likely to take place in a piecemeal and unplanned way.
37. No development should take place anywhere on Site 10 until a Masterplan (as required by the Bromley Town Centre Area Action Plan) is prepared showing how Site 10 as a whole can be developed sustainably without giving rise to the problems referred to above.
38. **Answer to Qu 20** the figure of 1,230 units is unlikely to be achieved on Site 3.
39. **A suggested modification** would be to include within the Site Policy for Site 10 the following:  
No planning permission granted and no development to take place before a Masterplan is prepared, consulted upon and agreed by the Council. The Masterplan will include massing studies as well as assessments of viability, feasibility, environmental quality and impacts on heritage assets.
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