



*Promoting awareness and protection for the built and green heritage of Bromley Town Centre and its resident and trading communities*

## Comments on the Draft Urban Design Guide SPD

We largely welcome the aims of this document which is based fairly closely on the National Design Code. We have the following comments which we hope can be addressed in the final document.

Para 1.8 p.2 – ‘All new development across the borough will be expected to reflect the history, character, and future aspirations of Bromley...’ ‘history and character’ is a given but ‘future aspirations’ need to be explained and qualified as in some cases these have already been seen to be highly damaging to ‘history and character’.

Para 2.14 p.6 – The Local Plan (2019) is referred here as being under review and we query what will be the fate of the Urban Design SPD when the Local Plan is replaced? One would hope that it is carried through to reflect the new policies of the London Plan 2021, in particular D3 and D9 on tall buildings and the LPGs referred to in para 2.12 that give significantly greater controls over tall buildings. The future status of the SPD should be explained in para 2.14.

Section 3 p.8 et seq – we warmly welcome and support the analysis of historical significance and existing characteristics of the 21 appraisal areas. There needs to be somewhat greater emphasis made of the importance of trees above the one line given in para 3.20. Leafy avenues and a bosky street environment is possibly the most important characteristic of suburban Bromley – important in all of the 21 areas.

Para 4.14 – 4.16 p.28 – we strongly welcome and support the ‘design led’ approach as opposed to the quantitative numerical approach. In the past Bromley has been confronted with developments designed to achieve a number of residential units or a predetermined value. The Churchill Quarter proposals, for example, have been designed to maximise a quantum of development rather than producing a design concept respecting history, character, place and conservation area considerations. We are glad to this approach appears to be being ruled out in the future.

### Contextual

Section 5 p.33 – We welcome the principles outlined here as being a fundamental approach to good design led planning. It’s a shame that all the photo examples given are located elsewhere. Are there no good examples of these design principles within the Borough?

### Heritage

DG 1 and DG2 reference setting of listed buildings and conservation areas. Re the latter the identified policies should also include policy 42 re development adjacent to a Conservation Area as it relates to the setting of a conservation area.

Para 5.7. Is particularly weak and lacks commitment to the role of heritage assets. e.g “*Heritage assets **can** strongly influence our understanding of place; they **can** make a significant contribution to our natural and built environment,*” the word ‘**can**’ should be omitted as it is self evident that

heritage assets **DO** influence understanding of place and **Do** make a contribution to our natural and built environment.

Para 5.10. The use of the word 'several' is again weak and unrepresentative of fact. "*Bromley has a particularly strong heritage with several natural and built form assets of architectural and historic significance. There are 47 designated Conservation Areas which include several statutory listed and locally listed buildings*". The word "several" should be replaced by '**Many**' or better still say how many.

We suggest reference should be made Historic England guidance notes which are intended to help developers working in a heritage context. It is noted that some developers quote from these in their Heritage Statements and / or Design and Access Statement showing they have addressed this important guidance. However, unless the SPD draws attention to these guidance notes they are mostly missed by applicants. Some key ones are:

- Local Heritage Listing
- The setting of Heritage Assets
- Conservation Area Designation Appraisal and Management
- Statement of Heritage Significance
- Tall Buildings etc.

### **Tall Buildings**

Para 5.25 p.48 – Again, it needs to be explained how this SPD will relate the new Local Plan when it is replaced. Particularly important in respect of the guidance on tall buildings.

Fig 16 p.49 – this diagram needs more explanation. As it stands it meaningless.

DG4 p.52 – generally welcomed. Taken on face value this guidance would seem to rule out the previous Churchill Quarter proposals and several other proposals in the Site 10 of the Local Plan.

### **Shopfront Design & Conservation areas**

Shopfront Design p.90 is much welcomed. The powers of the Council to follow through on these intentions are surely limited unless related to listed buildings or conservation areas. The more recent designations of Conservation Areas for Shortlands Village and Beckenham Town make these shopfront aspirations achievable and we believe there is an obvious need to expand the number of Conservation Areas including areas where shops are a vital part of the history and character. Examples would be Locks Bottom, Chatterton Village, Sundridge Village, Widmore Green, etc.

Para 5.128 p.91 – strongly supported but doubt whether the Council can actually prevent loss of historic features outside of conservation areas.

DG9 p.101 – welcomed but doubt whether this guidance can be anything more than advisory.

### **Streets p.121**

Would like to have seen more local examples within the Borough. The importance of street trees to the distinctive Bromley environment should be recognised.

### **Resources and Efficiency**

Para 5.240 p.141 The concept of 'retention and retrofitting' is clearly laudable and very much in line with current sustainable development principles. Sadly this is not being applied in Bromley town centre where there are several proposals in the pipeline that demolish and replace fairly recent buildings.

Para 5.248 p.144 As before, the concept of reducing embodied energy by ensuring the refurbishing existing buildings is supported but there is doubt as to how it might be enforced and implemented. The concept, if it is to carry any weight at all in the determination of planning applications should be incorporated into DG17. It is not there at present.

### **Urban Greening p.148**

Para 5.261 p.148 and DG17 f) p.151 – the references to green walls are particularly welcomed and supported. There are several locations in Bromley town centre where green or living walls could be installed eg Churchill Theatre/Library façade. There is also much need for other landscaping provision to enhance the urban scene.

### **Questionable Photo Examples:**

Whilst the Policies and accompanying texts cover important points like respecting context many of the photo examples, despite specific explanatory captions, show mostly bland buildings in a current and likely to date style without any context from which to judge appropriateness.

Figs 4 & 5 obviously seek to use traditional forms but are seen as devoid of detail or sense of joy and are reliant on a green setting to mitigate.

Fig 6 – is an exception in that a listed building is part of the concept but the result is dull and lifeless as architecture and totally reliant on the listed building to give any sense of place.

Fig 14 p.46 – is an oppressive and poor example of appropriate scale and massing.

Although intended to show specific situations the overall impression of chosen examples is a bland, one style of architecture seen everywhere today and based on cost effectiveness and formulaic solutions. In the context of an SPD these examples are in danger of being interpreted by developers as the Council's ideal rather than the SPD promoting innovation and response to context which the written document sets out to promote quite successfully. This kind of problem became apparent a few years ago with the CABA building formula of grey metal and terracotta cladding which now look absurdly dated and has been abandoned as an architectural style. Perhaps the better way to explain the policies and texts would be by diagrams rather than these photos which are so open to misinterpretation. Ideally photo examples might show development in the Bromley Borough where new development clearly *has* responded to context (if they exist).

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