



Bromley Town Centre Supplementary Planning Document

Consultation draft – October 2022

Bromley Council

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2022

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1. A Vision for Bromley Town Centre

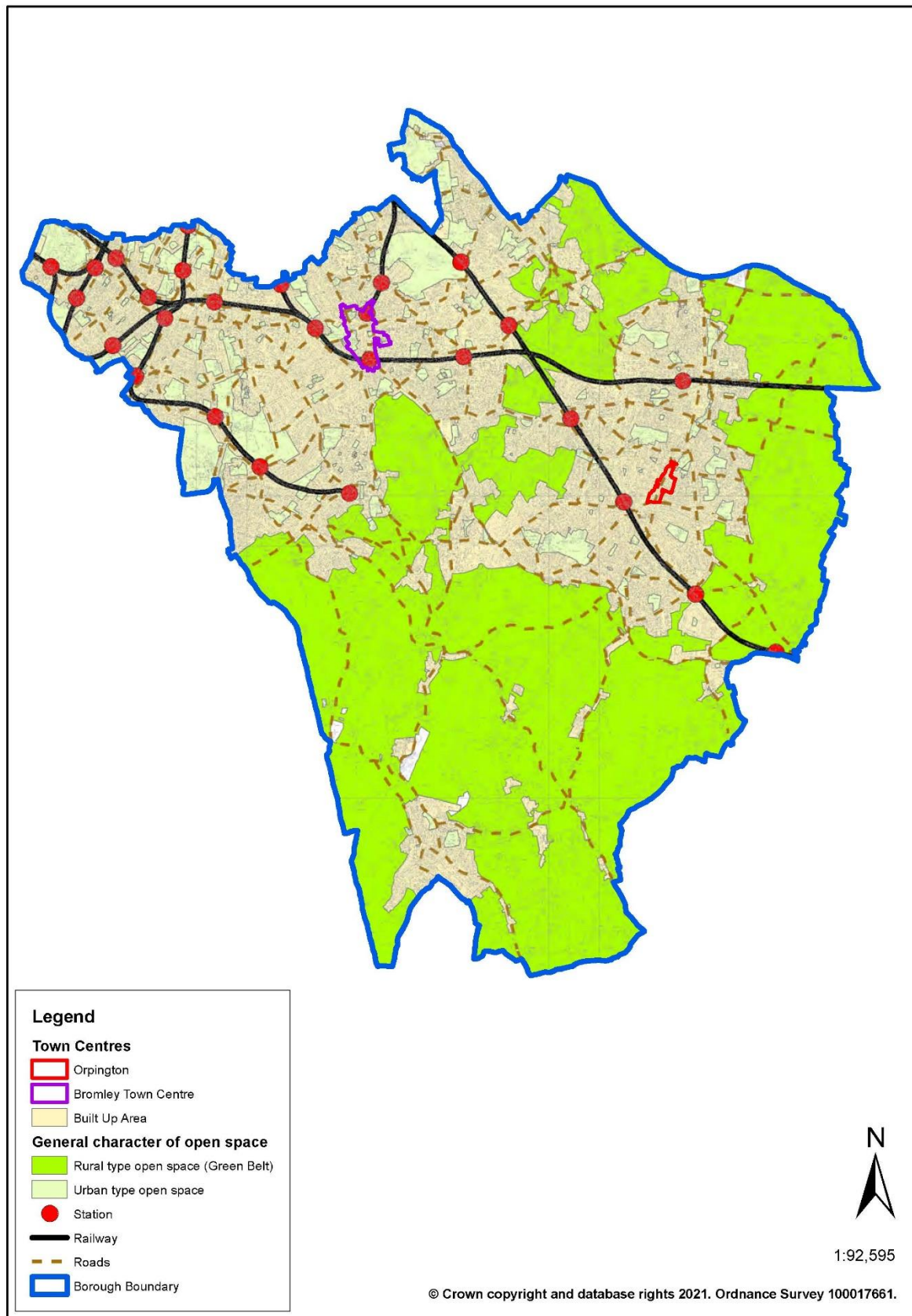
Introduction

- 1.1 Bromley Town Centre is, historically and currently, the main retail centre for the borough, as well as being a significant location for office use. It also has a significant residential population. It is a Metropolitan town centre and Opportunity Area, as set out in the Bromley Local Plan¹ and the London Plan², which together make up the statutory Development Plan for the Borough.
- 1.2 The nature of the London Borough of Bromley is predominantly suburban, with district centres interspersed with large areas of open Green Belt countryside, urban areas are mainly concentrated in the northwest of the borough. The two key centres; Bromley Town Centre and Orpington Town Centre each have distinct residential catchment areas with significant wedges of open space designated either Green Belt or Metropolitan Open Land separating the two areas.

¹ Bromley Local Plan (adopted January 2019), available from:
<https://www.bromley.gov.uk/downloads/file/51/bromley-local-plan>

² London Plan (adopted March 2021), available from:
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Figure 1: Borough context map



- 1.3 This Supplementary Planning Document (SPD) provides guidance on the interpretation of adopted planning policies as they relate to the Bromley Town Centre area; it does not set out new planning policy, as this cannot be done in an SPD. The Council is undertaking a review of the Local Plan; this SPD will help to inform preparation of this document, in relation to policies for Bromley Town Centre and the surrounding area.
- 1.4 Guidance is provided through a number of 'SPD guidance notes' set out in later sections of the document; these guidance notes include references to relevant policies and guidance where appropriate (although these are not-exhaustive and there may be other relevant policies and guidance which apply). The SPD assesses the varied characteristics of Bromley Town Centre by reference to character areas, and within them further sub-areas.
- 1.5 The SPD will be a material consideration in the determination of relevant planning applications within the area covered by the document.
- 1.6 The Council also has a range of strategies which should be read alongside this SPD, including the Regeneration Strategy³ and Economic Development Strategy⁴.

Vision for Bromley Town Centre

- 1.7 The Bromley Local Plan sets out the Vision for the Borough through to the 2030's, the majority of which is directly applicable to aspirations for Bromley Town Centre:

"Bromley is known for the high quality of its living, working and historic and natural environments. The Council, local people, organisations and businesses work together to ensure that we all enjoy a good quality of life, living healthy, full, independent and rewarding lives.

Bromley values its distinctive neighbourhoods, ranging from the rural to suburban and urban. Neighbourhoods provide a choice of good quality homes, jobs and a range of shops and services appropriate to the different town, district and local centres.

The protection and enhancement of conservation areas and heritage assets, along with high quality new development have contributed to civic pride and wellbeing.

The Green Belt fulfils its purpose, and, together with other open spaces, contributes to protecting Bromley's special character and the health and wellbeing of local residents and visitors alike.

Bromley has high levels of educational attainment, whilst strong and diverse businesses are able to invest to support a thriving economy."

- 1.8 Taking account of the Local Plan vision and consideration of Council priorities for the town centre and public consultation feedback, the following vision will underpin this SPD and sets out the key aspects of how Bromley Town Centre should develop:

³ London Borough of Bromley Regeneration Strategy 2020 to 2030, available from: <https://cde.bromley.gov.uk/documents/s50083012/RegenerationStrategy.pdf>

⁴ London Borough of Bromley Economic Development Strategy 2021 to 2031, available from: <https://www.bromley.gov.uk/downloads/file/1749/economic-development-strategy-2021-to-2031>

Vision for Bromley Town Centre

- The town centre will be the cultural, civic and economic heart of the borough, recognised for its cultural and leisure facilities and vibrant high quality shopping experience.
- Bromley Town Centre will develop a distinct residential character which will support the primary cultural, civic and economic role. The area will be home to a range of people and families living in high quality developments.
- Bromley Town Centre will be a place where heritage assets are respected and referenced by new development. The area has a strong historic environment with a number of listed buildings and a conservation area.
- Bromley Town Centre will maintain and enhance its role as a key office location in the Borough; it will provide a place to work and collaborate including grade A office space but also flexible, dynamic spaces for start-ups and creative workspace and spaces that are responsive to new working patterns post-pandemic.
- The town centre environment will comprise streets, squares, places, courtyards and ways, responsive to the human scale and easily navigable. Movement through key spaces should be easy and legible. Different areas will be recognisable due to the character and scale of surroundings, with buildings helping to define places and historic structures being a natural part of the town and how it is composed.
- Bromley Town Centre will be intertwined with nature, with a more ecologically rich and diverse environment. Parks and open spaces will be key spaces for people who live in, work in and visit the town centre; these spaces will be accessible to all, balancing wild nature with urban play, leisure and culture.
- Bromley Town Centre will be integrated and carefully connected to its surrounding suburbs and landscapes, though remaining distinct from these areas in terms of its role and character.
- Bromley Town Centre will be a people-focused town centre where pedestrian movement will be prioritised, and traffic impacts on public spaces will be mitigated. The High Street (both the pedestrianised and non-pedestrianised parts), Market Square, Elmfield Road, and the northern part of the town centre around East Street and West Street should first and foremost be places to dwell and enjoy.
- Bromley Town Centre will be resilient and able to deal with social, environmental and economic challenges and changes, including being responsive to climate change, weathering economic cycles and enduring the changing nature of our town centres. Spaces and development types should promote cultural, economic, education, social and leisure activity without constraining future transformations.

2. Policy framework

- 2.1 The policy framework for Bromley encompasses planning policy and guidance at a national, regional and local level.

Figure 2 – policy framework diagram



National planning policy and guidance

- 2.2 The National Planning Policy Framework⁵ (NPPF) sets the national policy context for preparation of local plans. Local Plans must be consistent with national policy and should enable the delivery of sustainable development in accordance with the policies in the NPPF. The NPPF is also capable of being a material consideration in the determination of planning applications. The current version of the NPPF was published in July 2021. National Planning Practice Guidance⁶ (PPG) provides further detail on various aspects of the NPPF.
- 2.3 The NPPF sets out a range of policies addressing matters including the areas of economy, town centres, sustainability and design; and advises that strategic policy-making authorities should “*set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-*

⁵ National Planning Policy Framework (July 2021), available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

⁶ Planning Practice Guidance, available from: <https://www.gov.uk/government/collections/planning-practice-guidance>

designed and beautiful homes to meet the needs of different groups in the community.”
(Paragraph 73c).

- 2.4 The NPPF also advises that *“significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”* (Paragraph 134)
- 2.5 The Government’s intention to rejuvenate High Streets is clear from its recently published vision for High Streets ‘Build Back Better High Streets’⁷ focussing on five key priorities
1. Breathing new life into empty buildings;
 2. Supporting high street businesses;
 3. Improving the public realm;
 4. Creating safe and clean spaces; and
 5. Celebrating pride in local communities.
- 2.6 The Government advises that this vision will be underpinned by a series of measures including proposals for a National Framework of Green Infrastructure Standards to be launched in 2022. This is to be accompanied by a programme of tree planting on high streets to help local authorities, developers and communities improve green infrastructure provision in their areas, and a revised Manual for Streets (due early 2022) to be embedded in the design process, so that more high streets are designed with a sense of place and to be attractive to people walking, cycling and using public transport. In September 2021, the Government also launched a consultation to make permanent, a range of temporary (pandemic), permitted development rights relating to outdoor measures for high streets and markets⁸.
- 2.7 To support future design codes, the National Model Design Code⁹ (NMDC) provides a framework for local authorities to develop their own localised codes; based on the ‘ten characteristics of a well-designed place’ as set out in the National Design Guide¹⁰ (NDG) and expanded upon within the NMDC.
- 2.8 The Environment Act received royal assent in November 2021. Once the provisions of the Act are commenced, it will mandate a minimum 10% Biodiversity Net Gain (BNG) with the aim of leaving the natural environment in a measurably better state than beforehand. The Act also proposes the use of a recognised Biodiversity Metric, which will be introduced following parliamentary scrutiny. To date, the Department for Environment, Food & Rural Affairs (DEFRA) Biodiversity Metric 3, launched in July 2020, is used as a tool to assess BNG.

⁷ Department for Levelling Up, Housing and Communities, Build Back Better High Streets (15 July 2021), available from: <https://www.gov.uk/government/publications/build-back-better-high-streets>

⁸ Department for Levelling Up, Housing and Communities et al, consultation on ‘Supporting defence infrastructure and the future of time-limited permitted development rights’ (published 5 September 2021), available from: <https://www.gov.uk/government/consultations/supporting-defence-infrastructure-and-the-future-of-time-limited-permitted-development-rights>

⁹ National Model Design Code (July 2021), available from: <https://www.gov.uk/government/publications/national-model-design-code>

¹⁰ National Design Guide (January 2021), available from: <https://www.gov.uk/government/publications/national-design-guide>

London planning policy and guidance

- 2.9 The Mayor of London produces a spatial development strategy (known as the London Plan). The current version of the London Plan was adopted in March 2021. The London Plan forms part of the Development Plan for each of the London local planning authorities and is used to assess planning applications.
- 2.10 Bromley Town Centre is one of 13 Metropolitan centres in Greater London and the only one in the borough, making it the most significant town centre in the borough; the nearest equivalent centre is Croydon. Bromley is identified in the London Plan as a centre that should see strategically significant levels of commercial growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6).
- 2.11 Bromley Town Centre is designated an Opportunity Area with an indicative target of delivering 2,000 jobs and 2,500 new homes.
- 2.12 The London Plan also identifies Bromley Town Centre as an area with high potential for residential growth, either within or on the edge of the town centre. This is a broad strategic-level categorisation that Boroughs should have regard to when seeking opportunities for residential growth in and around town centres.
- 2.13 In addition, Bromley Town Centre is also identified as an area of mixed-use office potential with capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use, and an area of regional or sub-regional significance in terms of the night-time economy.
- 2.14 There are a number of relevant London Plan policies that could apply to development proposals in Bromley Town Centre. The following policies are of particular relevance:
- Policies D1-D9, which set out a design and character-led approach to growth;
 - Policy T6, which stipulates that development in Major and Metropolitan town centres and in areas with a PTAL rating of 5-6 should be car-free; and
 - Policies SD6-SD9, which set out a number of policies for town centre development which follow a 'town centre first' approach to intensification and commercial uses.
- 2.15 The Mayor also has a number of adopted and draft Supplementary Planning Guidance (SPG) documents¹¹ which provide further detail on policies set out in the London Plan.

Local planning policy

- 2.16 The Bromley Local Plan was adopted in January 2019. The Local Plan sets out a number of planning policies, site allocations and land designations for the Borough, and along with the London Plan (2021) forms the Borough's Development Plan (used to assess planning applications). The Local Plan is accompanied by the Policies Map which illustrates geographically the application of the policies in the Local Plan.
- 2.17 The Local Plan identifies Bromley Town Centre as a focus for sustainable growth of retail, office, homes, and leisure and cultural activities, as well as allocating a number of sites for future development. Relevant policies supporting this requirement are set out below:

¹¹ Available from: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs>

- Policies 13, 14 and 16 are relevant to Bromley Town Centre. The policies cover the Bromley Common Renewal Area, which closely adjoins the south-eastern corner of the town centre.
 - Policy 13 defines the purpose of Renewal Areas, including as places where proposals should provide demonstrable economic, social and environmental benefits and address identified issues and opportunities.
 - Policy 14 states that development in, or close to, Renewal Areas should demonstrate how their benefits asset out in Policy 13, and where appropriate be guided by Development Briefs or other guidance.
 - Policy 16 defines expectations of the Bromley Common Renewal Area:

“Proposals within the Bromley Common Renewal Area will be expected to maximise opportunities to create a successful transition zone from Bromley Town Centre to the suburban and semi-rural urban fringe and produce a positive gateway to Bromley Town Centre along the Hayes Lane / Homesdale Road / A21(Bromley Common) junction, supported by appropriate green infrastructure.”

- Policy 26 requires applications to maximise opportunities to support and enhance health & wellbeing, encouraging physical activity, providing accessible and adaptable new dwellings, ensuring appropriate access to open space, particularly in areas of deficiency, and optimising health benefits throughout scheme design.
- Policy 37 requires all development proposals to be of a high standard of design and layout.
- Policy 48 identifies ‘Views of Local Importance’; the view of Keston Ridge from the southern section of Bromley High Street (looking south), and the view west and south from Martins Hill, Bromley. The Churchill Theatre and Library is a designated local landmark; views of this landmark are also protected by policy 48.
- Policies 59 and 79 are concerned with enhancing biodiversity and addressing deficiencies, based on the Local Plan’s assessment of Areas of Local Park Deficiency & Areas of Deficiency in Access to Nature. The eastern side of Bromley Town Centre has a deficiency in Local Parks (2 hectares or more) and the whole of Bromley Town Centre has a deficiency in access to nature. There is an existing sequence of Urban Open Spaces (Policy 55) and Local Green Spaces (Policy 56) (Queensmead, Martins Hill, Church House Gardens, College Green, Queens Gardens and Bromley Palace Park), three of which - Queensmead, Martins Hill and Bromley Palace Park - are also designated as Sites of Importance for Nature Conservation (Policy 69).
- Policy 78 advises that the Council will assess the likely impact on the quality and character of green corridors through the Borough and will seek and support appropriate enhancement and management.
- Policy 84 aims to manage and improve the supply of high-quality office floorspace in the three Business Improvement Areas, and so proposals will not be permitted which result in the loss of Class B1(a) floorspace or which compromise the primary function of the BIA. There are three Business Improvement Areas within Bromley Town Centre. Three Article 4 Directions¹² to withdraw the permitted development right for change of use from office to residential in the three Business Improvement Areas came into force in August 2015. These Directions will no longer apply as of August 2022, following the introduction of Class E to residential permitted development rights; the Council has made three new Directions to replace the existing Directions, which, if confirmed, will come into force in July 2022. In addition, the Council has also made Directions to remove office to residential demolition (Class ZA) permitted development rights in the three Business Improvement Areas. The removal of PD rights through the Article 4 Direction enables the Council to plan properly and ensure uses which contribute significantly to economic growth are protected.

¹² Available from: <https://www.bromley.gov.uk/planning/permitted-development>

- Policy 90 sets out the intention to prepare an Opportunity Area Planning Framework for Bromley Town Centre to deliver a minimum of 2,500 homes and an indicative 2,000 jobs and maximise its contribution to the vision and objectives of the Local Plan.
- Policy 91 aims to limit town centre uses to town centre sites wherever possible, and to ensure proposed uses have a positive impact on town centre vitality and viability.
- Policy 92 aims to preserve and enhance active frontages and ensure that changes of use away from A1 is carefully managed¹³, to different degrees for primary and secondary frontages. Criteria for secondary frontages are less onerous than those for primary.
- Policy 93 aims to preserve retail as the primary function specifically within The Glades shopping centre.
- Policy 97 sets out criteria for how proposals for conversion of upper floors in town centres will be assessed and aims to preserve office space where possible
- Policy 98 aims to ensure appropriate delivery of restaurants, pubs and hot food takeaways in town centres.
- Policy 99 aims to manage the change of use of town centre ground floors from retail to residential uses. Such proposals will be permitted subject to a number of criteria including not undermining retail vitality and viability.
- Policy 100 aims to retain market trading in town centres and encourage new markets, subject to criteria. Bromley has an historic street market operating on the High Street.
- Policy 101 aims to retain shopfronts of architectural merit and sets out criteria for the design of existing and new shopfronts.

Infrastructure delivery

- 2.18 The Community Infrastructure Levy (CIL) allows charging authorities in England and Wales to raise funds from developers undertaking new development, to help fund new or improved infrastructure required to support the growth identified in adopted Local Plans. CIL replaces much of the existing process of planning obligations commonly known as Section 106 (S106) agreements.
- 2.19 In Bromley, both a Mayoral CIL and local CIL are applied to relevant planning permissions (applications with an applicable charging rate which are determined after the relevant CIL charging schedule has come into effect). The Mayoral Community Infrastructure Levy¹⁴ (known as MCIL2) took effect on 1 April 2019; and the Bromley Community Infrastructure Levy¹⁵ (CIL) took effect on 15 June 2021.
- 2.20 The Infrastructure Delivery Plan (IDP) 2016 set out the infrastructure required to support planned growth identified in the Local Plan, over the period 2016-2031. The IDP was updated as part of the preparation of the Bromley CIL¹⁶.
- 2.21 The IDP identifies various infrastructure requirements relating to Bromley Town Centre, particularly those focused on improving connectivity and establishing Bromley Town Centre as a transport hub. This includes significant improvements to the public realm and localised junction improvements, particularly on the A21. As pressures and expectations evolve, there is likely to be an on-going need for a range of enhanced infrastructure, including green, transport, social, energy, waste and digital infrastructure.

¹³ The former A1 Use Class has now been subsumed into Use Class E.

¹⁴ Mayoral Community Infrastructure Levy, available from: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>

¹⁵ Bromley Community Infrastructure Levy, available from: <https://www.bromley.gov.uk/planning-policy/bromleys-community-infrastructure-levy>

¹⁶ Infrastructure Delivery Plan (IDP) Update Report 2020, available from: <https://www.bromley.gov.uk/downloads/file/698/london-borough-of-bromley-infrastructure-delivery-plan>

- 2.22 The Local Plan sets out the Council's transport investment priorities, with aspirations for improved transport links to Bromley North and Bromley South, for example through the enhancement of the Docklands Light Railway and Tramlink along with extensions of the London Underground.
- 2.23 Planning obligations may still be sought on specific schemes, particularly to secure affordable housing and carbon offsetting contributions, and to secure mitigation of any site-specific impacts. The Planning Obligations SPD¹⁷ sets out the Council's approach to securing planning obligations.

¹⁷ Planning Obligations SPD (June 2022), available from: <https://www.bromley.gov.uk/planning-policy/supplementary-planning-guidance>

3. Context

- 3.1 Bromley Town Centre is a designated Metropolitan town centre and is the largest town centre in the Borough. The town centre offers a range of retail, leisure, cultural, office and residential provision, including The Glades Shopping Centre, the Churchill Theatre, a pedestrianised High Street area and Bromley North Village. Bromley Borough has a very strong architectural heritage which is reflected in the Bromley Town Centre conservation area, which includes a number of listed and locally listed buildings.

Townscape and growth analysis

- 3.2 Bromley's role as a notable market town developed due to its location on a major coaching route to London. The town centre developed around the marketplace, located at today's Market Square, and grew along the old London to Hastings turnpike. Early maps show buildings grouped around the marketplace and the High Street.
- 3.3 Up to the mid-19th century, the town extended from Bromley College in the north, to Tweed Cottage, next to Aberdeen Buildings, in the south, with estate gardens abutting sections of the High Street. The opening of Bromley South railway station in 1858 and Bromley North railway station in 1878, and the subsequent suburban expansion of London, further encouraged growth as residential development radiated out from the historic town centre.
- 3.4 By the 1930s, the town centre had seen extensive development, including significant commercial and civic developments, with the High Street extending further south to connect with Masons Hill. Post-war, the town centre saw substantial redevelopment including post-Blitz reconstruction; this was largely within the existing development footprint. This included extensive new cultural, civic, and commercial facilities, such as the Churchill Theatre.
- 3.5 The commercial success of Bromley Town Centre altered the character of Bromley as a market town. The Glades Shopping Centre was completed in 1991 and the High Street was pedestrianised in the early 1990s to accommodate the popularity of Bromley as a commercial centre.
- 3.6 Pedestrianisation of the High Street was facilitated by the construction of Kentish Way in the early 1990s, to bypass the town centre and form a continuation of the A21; this created some severance issues between Bromley South and Masons Hill, and access to the east of the town centre towards the Civic Centre.
- 3.7 The creation of Kentish Way and the Glades Shopping Centre were significant interventions in the evolution of Bromley Town Centre influencing its present-day character.

Topography

- 3.8 Topography is a key consideration for developments in the town centre. Bromley Town Centre has excellent accessibility via public transport, with various bus routes and two train stations. Bromley South Station is situated at the bottom of the High Street, at the lowest lying part of the Town Centre. Access to the heart of the town centre is via a moderately steep, but short, walking route. Future developments in the town centre should seek to address these

topographical challenges with the aim of providing new development which can be accessed by sustainable modes of transport, consistent with Development Plan policy.

- 3.9 The change in topography is a key characteristic of the town centre which will influence the layout, height, scale and massing of future development.

Land use

- 3.10 Bromley is a Metropolitan town centre which serves a wide catchment area across the Borough and beyond into other Boroughs in London. It benefits from excellent accessibility to Central London and the wider South East by a variety of transport modes, particularly public transport.
- 3.11 The town centre provides a range of comparison and convenience retail, notably on the pedestrianised High Street and within the Glades Shopping Centre. The town centre is a focal point for offices, with concentrations of office use on Elmfield Road and around Bromley South and Bromley North stations and on London Road.
- 3.12 Leisure and cultural uses (including the Churchill Theatre), community facilities and civic functions (including Bromley Central Library) are also prominent in the centre.
- 3.13 Recent changes to the Use Classes Order could have an impact on the retail offer in Bromley Town Centre, as shops can now convert to previously separate uses such as cafes, restaurants and estate agents without requiring planning permission. Additionally, new permitted development rights allow Class E uses to convert to residential use. The Council is putting in place Article 4 Directions to remove these new permitted development rights in Bromley Town Centre.
- 3.14 The town centre retail has proven resilient during the pandemic, with few long-standing vacant units remaining in the town centre.
- 3.15 Your Bromley is the Business Improvement District (BID) for Bromley Town Centre¹⁸. The BID was first established in 2015; the BID uses levy payments from local businesses to provide services and develop projects within the BID area, for the benefit of local businesses, residents and visitors.

Scale and character

- 3.16 The central High Street area, which extends from Elmfield Road in the south to Market Square in the north, has a varied character. Some buildings have survived from the early 19th century; these tend to be modest two storey structures with traditional detailing. The remaining buildings are a mixture of late 19th century to early 20th century buildings; the former tend to be two to three storeys in height with narrow frontages following traditional building plots with well detailed commercial facades in brick.
- 3.17 Market Square has an intimate character; buildings are typically two to three storeys in height, including the prominent 1930's neo-Tudor building in the centre. The square is framed by several locally listed buildings of architectural merit.
- 3.18 The western side of the High Street contains large plots with post-war modernist buildings. The Glades Shopping Centre, built in the early 1990s, is a substantial structure contrasting

¹⁸ Details of Your Bromley are available from: <https://yourbromley.com/>

with the finer grain surroundings; the large footprint contributes to east-west severance within the town centre.

- 3.19 The majority of buildings in the northern High Street area, which runs from Market Square in the south to Bromley and Sheppard's Colleges in the north, date from the late 19th century; these are typically around three storeys in height with narrow frontages. A number of earlier buildings survive, typically timber framed two storey structures.
- 3.20 There are distinctive Victorian terraced dwellings in the area to the north of Market Square and in the vicinity of Bromley North Station. This area contains a number of important listed and locally listed landmark buildings including Bromley North Station, the former Town Hall, the former Public Library building and Bromley Baptist Church. Many of the buildings form part of a civic node; the original Victorian and Georgian architecture is attractively detailed and carefully executed.
- 3.21 Masons Hill was originally a distinct settlement to the south-east of the town centre, and currently connects the town centre with the Bromley Common Renewal Area. This area lacks a discernible character, in part due to the dominance of Kentish Way which runs through the area.

Heritage

- 3.22 Heritage designations and assets in Bromley Town Centre reinforce local distinctiveness in the town centre.
- 3.23 Bromley Town Centre conservation area is centred on the historic marketplace at the centre of the town; the most significant concentration of listed buildings in the town centre are located here, including the Grade I listed Bromley and Sheppard's Colleges.
- 3.24 The conservation area includes large areas of historic landscape. Much of this is also protected through green / open space and nature conservation designation.
- 3.25 The Bromley Town Centre conservation area Statement SPG (2011) provides a detailed appraisal of the architectural and historic character of the conservation area; and an overview of planning policy and management guidelines on how this character should be preserved and enhanced in the context of appropriate ongoing change.
- 3.26 The SPG divides the conservation area informally into the following character areas:
 - High Street (central section) - *'a fine grained traditional shopping street, with individual shop fronts retained.'*
 - High Street (northern section) - *'a traditional shopping street, which is not dominated by large box illuminated signage and individual shop fronts.'*
 - Market Square – *'a market town with the appearance of single frontage shopfronts and non dominant signage.'*
 - Ravensbourne Valley - *'open/green and semi rural character.'*
 - Widmore Road (East) and Tweedy Road – *'a residential road on the edge of the Town Centre with elegant rows of houses either side of Widmore Road.'*
 - Queens Gardens and the Glades Shopping Centre - *'a quiet landscaped enclave with mature trees close to the busy shopping centre.'*
 - Bromley North - *'a village atmosphere with fine grain retail and residential leading to a gateway containing civic buildings and a church at the Junction of Widmore and Tweedy Road.'*

- 3.27 This subdivision and the analysis of the qualities and attributes of these areas, as set out in the SPG, is relevant for this SPD.
- 3.28 Other non-designated heritage assets as defined in the National Planning Policy Framework which are identified during the course of any proposals are important to consider.
- 3.29 The Local Plan identifies a number of archaeological priority areas, which may have important archaeological remains surviving. If a proposed development takes place in these areas, then the preservation or recording of archaeological remains will be an important consideration. Historic England has recently reviewed Bromley's archaeological priority areas; this review will be a relevant material consideration for planning applications in Bromley Town Centre, the majority of which is covered by an archaeological priority area.
- 3.30 The Palace on the site of the modern Civic Centre is a significant listed building in a historic landscape, with several listed structures also within the grounds. Despite its historic and civic role, it is somewhat severed from the rest of the town.

Green networks

- 3.31 Bromley Town Centre includes extensive areas of public green space within and adjacent to the area, notably Queensmead, Martins Hill, Church House Gardens, Queens Gardens and Bromley Palace Park. The River Ravensbourne runs to the south of the Town Centre, including culverted sections. There are also several 'pocket parks' located within the town centre, including at the junction of Tweedy Road and London Road, and outside St Mark's Church at Bromley South.
- 3.32 However, the town centre is identified as deficient in access to nature. Small parts of the north, east and south of the town centre are identified as deficient in access to local parks.
- 3.33 Many site allocations and potential development sites sit adjacent to the town's existing network of green spaces, presenting a vital opportunity for development proposals to play a role in enriching biodiversity whilst boosting access and connectivity to and through these areas.

4. Design Principles

- 4.1 The Council has identified six overarching design principles (performance indicators) that are considered essential components in delivering good quality design, and which are widely documented as being among the key characteristics of successful well-designed places:
- Contextual (Character and Identity)
 - Responsive (Architecture and Landscape)
 - Connected (Movement and Connectivity)
 - Inclusive (Access and Inclusion)
 - Healthy (Health and Well-being)
 - Sustainable (Sustainable Design, Adaptability and Resilience)
- 4.2 The guidance notes which relate to the design principles set out relevant policy and guidance which is relevant to the principles; this is not an exhaustive list and there may be other policies and guidance that apply to development proposals.

SPD guidance note 1

Development proposals should provide sufficient information to demonstrate how they have addressed the six design principles set out within this SPD and specific guidance relating to the character area within which they are located.

Relevant policy and guidance includes:

Local Plan – policies 4, 26 and 37

London Plan – objectives GG1-GG6 and policies SD6-SD10; D2-D9; G1; T1, T2 and T4-T6; and DF1

NPPF – paragraphs 8-11, sections 5-9, 11-12 and 16

Contextual (Character and Identity)

- 4.3 Bromley Town Centre has a distinctive character arising from historic and architectural features and its role as a significant commercial and civic location. The success of new development in Bromley is largely dependent upon how well it relates to, and responds with, its surrounding context.
- 4.4 As set out in the NDG, well-designed places are based on a sound understanding of the surrounding context, influence their context positively and are responsive to local history, culture and heritage. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion. Well-designed places respond to existing local character and identity and contribute to local distinctiveness.
- 4.5 There are a number of historic buildings of notable architectural merit and local significance, including several statutorily listed buildings. A key urban design objective is to preserve and enhance the existing qualities of the townscape, landscape, and streetscape character.

- 4.6 The nature conservation context of an area is an important part of its character. The retention of trees and wildlife features of value, and the enhancement of biodiversity (for example through biodiversity net gain) can help to protect and enhance character. The replacement or relocation of species and habitats should only be a last resort, and replacement trees should reflect the existing value of the benefits of the trees removed.

SPD guidance note 2

Development proposals should make a positive contribution to the setting, by identifying existing physical, natural, social and cultural assets and seeking to strengthen them in the design of new schemes in order to reinforce local identity and sense of place.

Relevant policy and guidance includes:

Local Plan – policy 37

London Plan – objectives GG1 and GG2 and policies SD6-SD10; D2-D5, D8, HC1, G1, G6 and G7

NPPF – sections 12 and 16

Responsive (Architecture and Landscape)

- 4.7 Good design is about making places for people and should seek to evoke a sense of joy and delight. Well-designed places focus not just on the physical characteristics of buildings and spaces but by how they are used and experienced. Quality is measured as much by experience as it is by appearance.
- 4.8 As set out in the NDG, well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context and proposed density, to create a coherent form of development that people enjoy.
- 4.9 Historically, the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions.
- 4.10 In order to achieve this careful consideration should be given to the key aspects of development; form, layout, scale, height and massing, appearance, and landscape. All new development should consider its relationship with both the immediate and wider context including neighbouring buildings, streetscape, townscape, urban grain, and local views, vistas and landmarks.
- 4.11 All new development should seek to reference local context to inform detail, materials, and landscape; incorporating and/or interpreting those elements that are attractive, valued and which contribute to the quality of the surrounding area. Architectural design and materiality should be sympathetic to the local vernacular and responsive to the surroundings so as not to undermine or compromise local character, identity and distinctiveness.

SPD guidance note 3

The Council will seek to promote design excellence to ensure that new development achieves the highest standards of visual, functional and environmental quality to engage and inspire people, reflecting local identity, values, and aspirations.

All major development proposals should be subject to independent design scrutiny by an appointed Design Review Panel bringing together leading professionals in the fields of architecture, urban design, landscape architecture, and environmental sustainability providing independent, expert advice to support the delivery of high-quality development.

All major development proposals should be subject to meaningful collaboration and community engagement ensuring that residents and stakeholders have the opportunity to inform and influence new development.

Relevant policy and guidance includes:

Local Plan – policy 37

London Plan – policies D2-D9

NPPF – section 12

Connected (Movement and Connectivity)

- 4.12 Ease of movement is integral to well-designed places, influencing how places function and feel. Creating better connections allows people to have greater choices between different modes of transport and greater access to social and economic opportunities both within and beyond their communities.
- 4.13 As set out in the NDG, successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries.
- 4.14 Well-designed streets contribute significantly to the quality of the built environment and play a key role in the creation of sustainable communities. The Council will seek to promote healthy streets and active lifestyles in accordance with London Plan and Local Plan policies by encouraging walking and cycling and promoting sustainable modes of transport.
- 4.15 Legibility is a key aspect of movement and a key urban design objective. A legible place is a place that is easy to understand and move through, new development can promote legibility by providing recognisable routes, focal points, nodes, and landmarks which stitch into the existing urban fabric. All new development should promote accessibility, legibility, and ease of movement by creating places that connect well with each other and the wider area.
- 4.16 Future opportunities to enhance active travel and improve permeability would align with the aims of the 'Connected' design principle, prioritising walking and cycling to facilitate safe, efficient, ease of movement as part of an integrated transport network, particularly connections to and from public transport nodes and connections to the eastern part of the town centre that address the severance caused by Kentish Way.

SPD guidance note 4

Development proposals should establish a clear hierarchy of permeable routes and spaces ensuring that new connections correspond with existing routes to promote greater ease of movement and improve wider connectivity.

Relevant policy and guidance includes:

Local Plan – policies 31 and 34

London Plan – policies T1-T6

NPPF – section 9

Inclusive (Access and Inclusion)

- 4.17 Inclusive design is integral to good design. The built environment should be safe, accessible, and convenient for all, it is therefore essential that new development considers inclusive design principles from the outset.
- 4.18 Inclusive design “*aims to remove the barriers that create undue effort and separation, enabling everyone to participate equally, confidently and independently in everyday activities*”¹⁹. It is integral to good design.
- 4.19 Inclusive design places people at the heart of the design process, acknowledges diversity and difference, offers more than one solution when required, provides for flexibility in use, and provides buildings and spaces that are convenient and enjoyable for everyone.
- 4.20 As set out in the NDG, well-designed places are those designed to be inclusive and to meet the changing needs of people of different ages and abilities. This includes families, extended families, older people, students, and people with physical disabilities or mental health needs. They provide well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive.

SPD guidance note 5

Applicants should carry out meaningful engagement with relevant user groups at an early stage in the design process, which may include disabled people or older people’s organisations. Development proposals should achieve the highest standards of inclusive design, contributing to a built environment that is safe, accessible, and convenient for all.

Relevant policy and guidance includes:

Local Plan – policy 37

London Plan – objective GG1 and policy D5

NPPF – sections 8 and 12

¹⁹ See CABI guidance document ‘The Principles of Inclusive Design’, May 2006 - available here: <https://www.designcouncil.org.uk/resources/guide/principles-inclusive-design>

Healthy (Health and Wellbeing)

- 4.21 The places in which we live and work affect our health and well-being. Adopting healthy placemaking principles which prioritise our long-term health is an essential part of good urban design.
- 4.22 As set out in the NDG, well-designed places include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion. Well-designed homes and buildings are functional, accessible and sustainable. They provide good quality internal environments and external spaces that support the health and well-being of their users.
- 4.23 New development can help to provide strong, vibrant, sustainable communities by creating healthy environments which support both physical and mental health. In particular, the link between healthy homes and access to green open space and mental well-being is well documented. Good design can also help to reduce the perception, and incidences of, crime and disorder, which can have significant detrimental impacts on local communities.
- 4.24 The Council will promote healthy living by ensuring that new development seeks to maximise opportunities to support and enhance health and well-being, encouraging physical activity, providing accessible and adaptable homes, ensuring social inclusion and access to open space particularly in areas of deficiency, and optimising health benefits throughout each stage of the design process. New development can also help to combat loneliness, for example through design which delivers community infrastructure and which fosters social interaction²⁰.
- 4.25 Objective GG3 of the London Plan advocates use of Health Impact Assessments, which are used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population, and to highlight any health inequalities that may arise. Health Impact Assessments should be undertaken as early as possible in the design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

SPD guidance note 6

Good design can significantly improve quality of life. Development proposals should seek to promote and prioritise health and well-being, demonstrating how Local Plan Policy 26a has been addressed. Major development proposals are encouraged to submit a Health Impact Assessment (HIA) to assist with the determination of health-related aspects of the proposed development. The scope of the HIA should be agreed with the Council at pre-application stage; this should include consideration of any best practice guidance for producing HIAs, including guidance produced by the NHS.

Relevant policy and guidance includes:

Local Plan – policies 17 and 26

London Plan – objective GG3

²⁰ 'Tackling Loneliness: A strategy for Bromley 2022 to 2026' sets out various actions the Council is taking to tackling the issue of loneliness, and may be a useful reference for applicants preparing planning applications. It is available at: <https://www.bromley.gov.uk/downloads/file/1165/tackling-loneliness-a-strategy-for-bromley-2022-to-2026>

NPPF – sections 8 and 12

- 4.26 Bromley Town Centre’s numerous green and open spaces are a fantastic asset which add value to the town centre’s offer and also support improved physical and mental health. Development proposals should seek to enhance access to nature and access to green space, including through improving connections between existing spaces.
- 4.27 Other opportunities to provide high-quality public space should be prioritised, to enrich the appearance and public life of the town centre. Public space should take advantage of views and underused spaces – including spaces above ground floor level; this will allow larger and taller development to have public amenity value beyond street level.

SPD guidance note 7

Development proposals should explore opportunities to provide spaces which are publicly accessible and promote health and wellbeing. This might be in the form of public parks, squares and gardens, pocket parks, and, where taller buildings are considered appropriate, public space at height such as viewing terraces, and rooftop gardens.

Relevant policy and guidance includes:

Local Plan – policies 26 and 59

London Plan – objective GG3 and policies D3, D9, G1 and G4

NPPF – section 8

Sustainable (Sustainable Design, Adaptability and Resilience)

- 4.28 The NPPF highlights three interdependent overarching planning objectives in achieving sustainable development; economic (supporting growth), social (supporting communities), and environmental (protecting and enhancing our natural and built environment) that need to be considered collectively.
- 4.29 A key urban design objective is to ensure that new development achieves the highest standards of sustainable design and construction in accordance with national, London and local plan policies, to improve environmental performance by reducing energy demand, improving resource efficiency, and by encouraging the efficient use of buildings and previously developed land.
- 4.30 The London Plan highlights the importance and multifunctional benefits of green infrastructure (an important element of sustainable design) which include promoting physical and mental health, enhancing local biodiversity, and its role in helping to adapt to the impacts of climate change. Air quality, cooling, and flood mitigation can all be addressed in part with green infrastructure.
- 4.31 As set out in the NDG, well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change, is fit for purpose and adaptable over time and adopts technologies to minimise their environmental impact.

4.32 The most successful places are those that are adaptable to change and are able to continually evolve in order to remain vibrant. Places need to be adaptable at every scale.

SPD guidance note 8

Development proposals should be designed to allow for future social, economic, and environmental change to accommodate the needs of both existing and future communities. Development proposals should achieve high sustainability standards in line with the London Plan and relevant SPGs. This should include adopting circular economy approaches to promote resource efficiency and address challenge of climate change, and the use of Whole Lifetime Carbon Assessments.

Development proposals are encouraged to follow a 'Retrofit first' approach from the outset of designing the proposal, to fully investigate whether existing buildings can be re-purposed (either wholly or in part) instead of demolishing and rebuilding which has more significant impacts in terms of carbon emissions and waste.

Relevant policy and guidance includes:

Local Plan – policies 112-117 and 123-124

London Plan – objective GG6 and policies SI2-SI5 and SI7

NPPF – paragraph 8 and section 14

5. Character areas

Character areas and sub-areas

- 5.1 The SPD divides Bromley Town Centre into a series of character areas, as shown on Figure 3. These areas have been derived through consideration of the context of the wider area and represent those parts of the area which are considered to have similar characteristics – these are explained below. The character areas and sub-areas are not intended to be finite boundaries; they are identified for the purposes of this SPD to set out relevant guidance applicable to each area. They have been drawn with deliberately 'soft' edges reflecting the fact that boundaries between character areas are fluid rather than 'fixed'.

Figure 3: Bromley character areas and sub-areas



Character Areas and Sub Character Areas

- | | | | |
|---|----------------------|---|----------------------|
|  | Bromley North |  | Bromley East |
|  | Bromley West |  | Bromley South |



Bromley North

Bromley North Gateway

5.2 An area centred upon Bromley North Station and bordering residential areas to the northeast of the town centre.

Key characteristics:

- Land use – Bromley North Station, office uses
- Prevailing building height – generally three to four storeys with individual taller buildings of six and ten storeys
- Development potential – high

North Village

5.3 A predominantly low-rise and fine-grain area set between the High Street and the A21, North Village comprises residential, commercial and social uses. The area is home to several heritage assets including Bromley and Sheppard's College.

Key characteristics:

- Land use – mix of uses, predominantly retail and leisure
- Prevailing building height – two to three storeys
- Development potential – low

North High Street

5.4 The High Street north of Market Square includes commercial and office space stretching up London Road.

Key characteristics:

- Land use – mix of uses, predominantly office, retail and leisure
- Prevailing building height – three to four storeys
- Development potential – low to medium

Bromley West

High Street

5.5 This area includes the part of Bromley High Street south of Market Square, up to Bromley South Station.

Key characteristics:

- Land use – significant concentration of retail, cultural and leisure uses, with a mix of other uses including Bromley Library. Bromley Charter Market operates at the north of the sub-area
- Prevailing building height – three to four storeys with individual taller element at Churchill Theatre (nine to ten storeys)
- Development potential – medium to high

Church House

5.6 Church House is an area west of the High Street which descends toward the River Ravensbourne, including public gardens/parkland and low-density housing development west of the High Street.

Key characteristics:

- Land use – public park, low-rise residential houses
- Prevailing building height – N/A for Church House Gardens, two storeys in adjacent residential area
- Development potential – low

Bromley East

The Glades & Elmfield Road

5.7 Mid to late 20th Century development between the High Street and Kentish Way including the Glades shopping centre, retail units at the Mall, the Pavilion leisure centre and various office buildings. The sub-area also includes Queens Gardens, a well-used green space.

Key characteristics:

- Land use – significant concentration of retail, cultural and leisure uses at the Glades, and significant concentration of office uses on Elmfield Road
- Prevailing building height – generally four to five storeys with several taller buildings along Elmfield Road (the tallest being 10 storeys)
- Development potential – high

Civic Centre / Bromley Palace

5.8 An area formed of the former estate of the Bishop's Palace, now serving as Bromley's Civic Centre includes various council buildings in addition to the Palace, a historic landscape and a multistorey council car park facing Kentish Way. The area is bordered by low-rise housing.

Key characteristics:

- Land use – civic uses and public park
- Prevailing building height – three to four storeys on the Civic Centre site with two storey semi-detached housing to the north and south of the sub-area
- Development potential – medium

Bromley South

Bromley South

5.9 Bromley South comprises the land around Bromley South Station at the bottom of the High Street. To the east, the area connects to Mason's Hill.

Key characteristics:

- Land use – Bromley South Station, mix of commercial, retail and residential uses
- Prevailing building height – varied building heights across the sub-area. Broadly three to six storeys with two tall buildings (17 and 19 storeys)
- Development potential – high

General guidance for character areas

- 5.10 Further to the guidance for each character area – set out in the following sections of the SPD – there is general guidance which applies across all of the character areas.

Heritage and conservation

- 5.11 The historic environment in Bromley Town Centre adds significantly to the character and distinctiveness of the area. It is an integral part of achieving sustainable development in the area.
- 5.12 Bromley Town Centre has a number of heritage assets, including a designated conservation area, a number of statutory listed buildings and locally listed buildings and an archaeological priority area.

SPD guidance note 9

Development proposals must clearly set out any positive and/or adverse impacts on heritage assets. A Heritage Statement will be required in certain circumstances, as set out in the Council's validation requirements; all applications are encouraged to submit a Heritage Statement where the proposed development is in close proximity to a heritage asset. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.

Relevant policy and guidance includes:

Local Plan – policies 38-43 and 45-46

London Plan – objectives GG1 and GG2, and policies HC1 and HC3

NPPF – section 16

Density

- 5.13 All development proposals should follow a 'design-led' approach in order to establish appropriate density and site capacity, with a focus on context and character, in accordance with the London Plan.
- 5.14 Establishing appropriate densities for sites in Bromley Town Centre should result from a creative, design-led approach which responds to the particular characteristics of the site, its surroundings and the needs of future residents, rather than applying general density standards.

SPD guidance note 10

Development proposals should seek to optimise site capacity ensuring that development is of the most appropriate form and land use for the site, responding to context and capacity for growth, with a focus on quality of place over quantum of development.

Relevant policy and guidance includes:

Local Plan – policies 4 and 37

London Plan – objectives GG1, GG2 and GG3, and policies D3 and D4

NPPF – sections 11 and 12

Tall buildings

- 5.15 Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline. As set out in the London Plan, this may vary in different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 5.16 Well-located and well-designed tall buildings can provide important urban landmarks and much needed homes at increased densities. They can also facilitate wider regeneration benefits. However, due to their scale and prominence, tall buildings have the potential to significantly alter local character and impact on the setting of heritage assets and conservation areas, and impact negatively on local environmental conditions and amenity (micro-climate effects).
- 5.17 The existing prevailing heights in an area are particularly important in determining suitable heights for new development proposals. It is essential that proposals for tall buildings respond appropriately in terms of their height, scale and massing - to both neighbouring buildings and the wider context of the town centre. Guidance on building heights which the Council considers to be suitable is provided in relation to specific character areas (where appropriate).
- 5.18 Topography is a particularly relevant consideration for tall buildings in Bromley Town Centre, given the difference in levels between the north and south of the area. Generally, taller buildings are likely to be more acceptable around Bromley South, correlating with the lower lying areas of the town centre. It should also be noted that the character to the north of the town centre, including in the Bromley North Gateway, North Village, North High Street and High Street character areas, also differs to that of Bromley South and features a higher concentration of listed and locally listed heritage assets; tall buildings are therefore less likely to be considered acceptable within this context.
- 5.19 In addition to location, architectural design quality and demonstration of wider benefits, a detailed justification for all tall building proposals will be required; this may include townscape contribution - providing visual emphasis, marking thresholds or land use.
- 5.20 Tall buildings should be grounded in their context, they require articulation and a clear narrative informed by local character and identity which should be reflected within the architecture, materiality and detailing - particularly those which form part of an established built-form frontage, as opposed to stand-alone buildings which may, where appropriate, convey a different identity.

SPD guidance note 11

Development proposals for tall buildings must provide detailed justification relating to their visual, functional, environmental and cumulative impact, in line with Policy D9 of the London Plan. Proposals will be required to make a positive contribution to the townscape

ensuring that their massing, scale and layout enhances the character of the surrounding area.

Tall buildings will need to be of the highest architectural design quality and be appropriate to their local location and historic context, including taking account of 'Views of Local Importance'; the view of Keston Ridge from southern section of Bromley High Street (looking south), and the view west and south from Martins Hill, Bromley. The Churchill Theatre and Library is a designated local landmark; views of this landmark must also be a key consideration when considering tall building proposals.

Relevant policy and guidance includes:

Local Plan – policies 37, 47 and 48

London Plan – objectives GG1, GG2 and GG3, and policies D2, D3, D4 and D9

NPPF – section 12

Transport and connectivity

5.21 Figure 4 sets out a number of key connections and potential new connections. Development proposals should have regard to both existing and emerging connections and movement patterns from the outset. Development proposals should seek to enhance these connections to improve movement and connectivity within and across Bromley Town Centre.

Figure 4: Bromley Town Centre key connections and potential connections²¹



Key Connections



Existing good pedestrian connectivity



Key connectivity improvements

Please note, arrows are indicative.



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²¹ Please note that the key connectivity improvements shown on Figure 4 are indicative not literal; they set out the broad locations/directions where connectivity improvements may be sought as part of any development proposals that may come forward.

- 5.22 Bromley Town Centre benefits from excellent accessibility via various modes of transport, particularly walking, cycling and public transport. Connectivity within the town centre is improved by the pedestrianised stretch of the High Street and other recently improved public realm, including around East Street to the north of the town centre.
- 5.23 At a wider scale, various London Cycle Network Routes – Routes 27, 28, 63 and 75 - connect Bromley Town Centre with other parts of the Borough and to Greenwich, Lewisham and other Boroughs in London.
- 5.24 Kentish Way causes various severance issues, especially in terms of facilitating east-west movement to the Civic Centre site and the suburban area beyond. Development proposals should seek to address this, including through public realm interventions which enhance the areas beneath the road.
- 5.25 Masons Hill/Westmoreland Road junction capacity improvements are identified as a potential transport improvement in the Local Plan, policy 36. This could help to address accessibility issues in the south of the town centre, particularly from/towards Masons Hill and Bromley Common (which is the busiest junction in the borough).
- 5.26 As noted in paragraph 2.22, the Local Plan sets out the Council's transport investment priorities, with aspirations for improved transport links to Bromley North and Bromley South.
- 5.27 The Glades shopping centre provides a series of connections across the central part of the town centre but the consolidation of these connections within a single large 'mall' complex can be confusing due to a lack of clear natural wayfinding.

SPD guidance note 12

Development proposals should link with existing pedestrian and cycling key routes, and should seek to improve these routes or create new routes where appropriate (particularly major developments). Improvement of east-west routes will be a particular priority.

Public realm schemes which improve pedestrian and cycle infrastructure would be consistent with local, regional and national planning policy; the delivery of any future schemes would be a separate decision for the Council, subject to funding and consultation.

Relevant policy and guidance includes:

Local Plan – policies 31, 32 and 36

London Plan – objective GG2 and policies T1 and T2

NPPF – paragraphs 92 and 104

Green infrastructure and biodiversity

- 5.28 The extensive green spaces within Bromley Town Centre are a significant asset for the town centre and offer a range of opportunities to develop an environment-focused approach for the town centre, maximising the potential offered by green spaces and routes within and beyond the town centre. This links with other opportunities, notably the opportunities to enhance connectivity and active travel.

- 5.29 However, these spaces currently do not provide adequate access to nature; as highlighted above, Bromley Town Centre is designated as an 'Area of Deficiency in Access to Nature'. Improvements to connectivity between existing green spaces in the town centre and the creation of new green spaces (including pocket parks) could provide linked habitats and green corridors, creating opportunities for biodiversity to flourish through linkages between local Sites of Importance for Nature Conservation (SINCs). Opportunities for new and improved spaces could result from development in proximity to these spaces; a number of site allocations and potential development sites sit adjacent to the town's existing network of green spaces, presenting potential opportunities for future development proposals to play a role in enriching biodiversity whilst improving 'human' connections.
- 5.30 There is potential to enhance the role of Queens Gardens and Bromley Palace Park, through better connections, environmental improvements, and, where possible, enlargement of the green space; such enhancements would be demonstrably positive for the town centre as a whole, and would help to address the deficiency in Local Parks (of more than 2 hectares) on the eastern side of Bromley Town Centre.
- 5.31 The Bromley Biodiversity Plan (BBP) 2021-2026²², seeks to promote coordinated action for biodiversity at the local level. The BBP is a relevant material consideration for planning applications in relation to biodiversity issues. The BBP details the priority habitats and species in the borough and should be read in conjunction with idverde Bromley Biodiversity Action Plan (iBBAP) written by idverde²³, who manage Bromley owned land. The iBBAP provides detailed actions and targets for Bromley owned land but these are also generally applicable to habitats under different ownership.

SPD guidance note 13

Applicants should demonstrate how their development proposals enhance the ecological richness of the local environment using the Government's published Biodiversity Metric, to achieve a biodiversity net gain. Proposals near to existing green and open spaces should maximise opportunities to enhance biodiversity and create a joined-up sequence of functional, publicly accessible green spaces through the town centre and beyond.

Relevant policy and guidance includes:

Local Plan – policies 37c, 59, 71, 72, 74, 78, 79

London Plan – objective GG3 and policies G1, G4, G5 and G6

NPPF – paragraphs 130, 131 and 180d

Sustainability

- 5.32 Development Plan policy, particularly policy set out in the London Plan, is underpinned by the need to deliver sustainable design. Good Growth objective 6 of the London Plan notes the need to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050. To achieve this,

²² Available from: <https://www.bromley.gov.uk/planning-policy/biodiversity-bromley>

²³ Available from: <https://www.bromleyparks.co.uk/wp-content/uploads/2017/11/Bromley-Biodiversity-Action-Plan-Public-Version-Branded.pdf>

the objective notes the need to ensure that buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.

- 5.33 In line with the ‘Sustainable’ design principle, new development should minimise its energy use and maximise carbon reduction, both in terms of its design and materials and its future use. London Plan policy SI2- and accompanying GLA guidance requires major development proposals to undertake an energy assessment and develop a carbon reduction strategy, aiming to be “zero carbon”. In accordance with the policy, reductions should be made on site where possible, although there is provision for off-site mitigation and/ or a carbon off-setting payment where agreed. Smaller scale developments should also aim to reduce their carbon footprint and are strongly encouraged to demonstrate how they have been designed to accord with the energy hierarchy.
- 5.34 Development proposals in Bromley Town Centre should strive to provide exemplary sustainable design in line with Development Plan policy; this is particularly the case for larger schemes, which, due to their scale, offer the opportunity to deliver significant sustainability benefits.
- 5.35 The potential for overheating should be considered in all developments, in line with London Plan policy SI3. The cooling hierarchy clarifies that the design of buildings is crucial to minimising overheating, and that air conditioning (active cooling) should be a last resort. As noted above, green infrastructure should be investigated for its multiple benefits to the town centre, as set out above, including increasing shading and improving comfort for residents and visitors.
- 5.36 Bromley Town Centre is within an Air Quality Management Area (AQMA), which are areas declared by the Borough in response to modelled or measured existing exceedances of legal air quality limits. Part of the town centre – Tweedy Road A21/High Street/Widmore Road A222 – is identified as an Air Quality Focus Area (AQFA), an area where the risk of exceeding pollution limits is high and where there is also high human exposure. London Plan policy SI1 sets out specific requirements to tackle poor air quality, including a requirement for major development proposals to submit an Air Quality Assessment. The Bromley Air Quality Action Plan 2020-2025²⁴ outlines the actions the Council is taking to improve air quality in the borough.

SPD guidance note 14

The London Plan sustainable infrastructure policies must be addressed in full, with provision of detailed and timely information to enable assessment against the relevant policy criteria.

The energy hierarchy is the starting point for future-proofing development in Bromley Town Centre, increasing energy efficiency and minimising carbon emissions. The same principles apply to refurbishments of existing buildings as to new buildings.

Development proposals must be designed in accordance with the energy hierarchy, prioritising design solutions which minimise the energy demand of the proposal in line with the hierarchy priorities.

²⁴ Available from: <https://www.bromley.gov.uk/pollution-control-air-quality/air-quality-bromley>

Opportunities for retrofitting of existing buildings should be robustly investigated ahead of demolition and rebuild; this could reduce the need for new materials, as long as the resulting development is fit for purpose, efficient and comfortable for users. Otherwise, the replacement of a building should reuse demolition materials on site and take advantage of the potential for a more energy efficient construction and design.

The heat and power needed for users should be provided as efficiently as possible and through low or zero carbon technologies. Where feasible, new developments should link to any local heat and energy networks, or plan for connection in the future.

The comfort of users should be a key part of designing development proposals, minimising the need for heating or powered cooling in particular.

Relevant policy and guidance includes:

Local Plan – policies 112-117 and 123-124

London Plan – objective GG6 and policies SI2-SI5 and SI7

NPPF – paragraph 8 and section 14

Use Class E and permitted development rights

- 5.37 The introduction of Use Class E has the potential for some positive benefits for Bromley Town Centre, by increasing flexibility to allow for the introduction of a wider range of commercial uses, but conversely it could undermine planning policy and local strategies for the town centre, where particular types of uses are prioritised.
- 5.38 The UCO changes are a blunt tool which do not allow consideration of the potential adverse impacts of the new use, particularly in those predominantly retail areas which continue to perform strongly. Unrestricted change of use in Bromley Town Centre could ultimately have adverse impacts on the vitality and viability of the area, for example, by reducing the provision of shops which provide essential services.
- 5.39 Permitted Development rights also have the potential to undermine Development Plan policies, with potentially significant adverse impacts on local amenity resulting from the loss of designated retail and employment areas. In particular, the designated Business Improvement Areas (BIAs) in Bromley Town Centre could be affected. The BIAs feature significant amounts of office floorspace; the Local Plan aims to manage and improve this floorspace and resists redevelopment proposals which result in the loss of office floorspace or compromise the function of the area.
- 5.40 In particular, Part 3, Class MA PD rights (which allow Class E uses to convert to residential use) could fundamentally alter the face of the town centre, with the likely loss of a significant amount of economic and retail floorspace. This would undermine the ability of the Council to deliver on economic growth aspirations set out in the adopted Local Plan and other strategies. It would also mean that the likely demand for new retail services from new town centre residents may not be able to be met, due to a lack of retail units.
- 5.41 The Council intends to utilise planning conditions to restrict permitted development rights and changes within Use Class E, to ensure that such changes will require planning permission and can therefore be assessed against relevant Development Plan policy.

SPD guidance note 15

Where considered necessary to protect the vitality and viability of the town centre and assist with the implementation of Development Plan policies, planning conditions will be used to remove the provisions of Use Class E and to remove specific permitted development rights.

A planning condition may be imposed on new development proposals involving Class E uses to restrict the operation of Section 55(2)(f) of the Town and Country Planning Act 1990 and require that the premises subject to the application shall only be used for a specific use(s) within Class E, therefore limiting the ability to change to other Class E uses without planning permission.

Planning conditions may be imposed on new development proposals to remove permitted development rights, particularly Part 3, Class MA permitted development rights which allow Class E uses to change to residential use.

Relevant policy and guidance includes:

Local Plan – policies 85, 91-92 and 98-99

London Plan – objectives GG1-GG3 and GG5, and policies SD6-SD10, E1, E9 and HC5-HC7

NPPF – sections 6-8

6. Bromley North

Bromley North Gateway

- 6.1 This sub-area sits on the A21, a significant route that divides the town centre from residential areas to the north. Bromley North Station is located within the sub-area.
- 6.2 Local Plan Site Allocation 2 allocates Bromley North Station and adjacent land for mixed-use redevelopment for 525 residential units, 2,000sqm of office space, with community and retail uses. The allocation also sets out a clear requirement for the development of a transport interchange.
- 6.3 In the north of the sub-area, beyond the A21, former railway lands have become residential areas, predominantly made up of houses including larger family homes.
- 6.4 There are a number of office and commercial buildings along Tweedy Road and on Newman Road and Sherman Road. These areas are covered by a Business Improvement Area under Local Plan policy 84. **The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.**
- 6.5 **The existing office and commercial buildings could lend themselves to a retrofit-first approach, which would ensure that impacts from existing embodied carbon are significantly reduced, compared to a proposal involving demolition of the existing buildings.**

Development opportunities

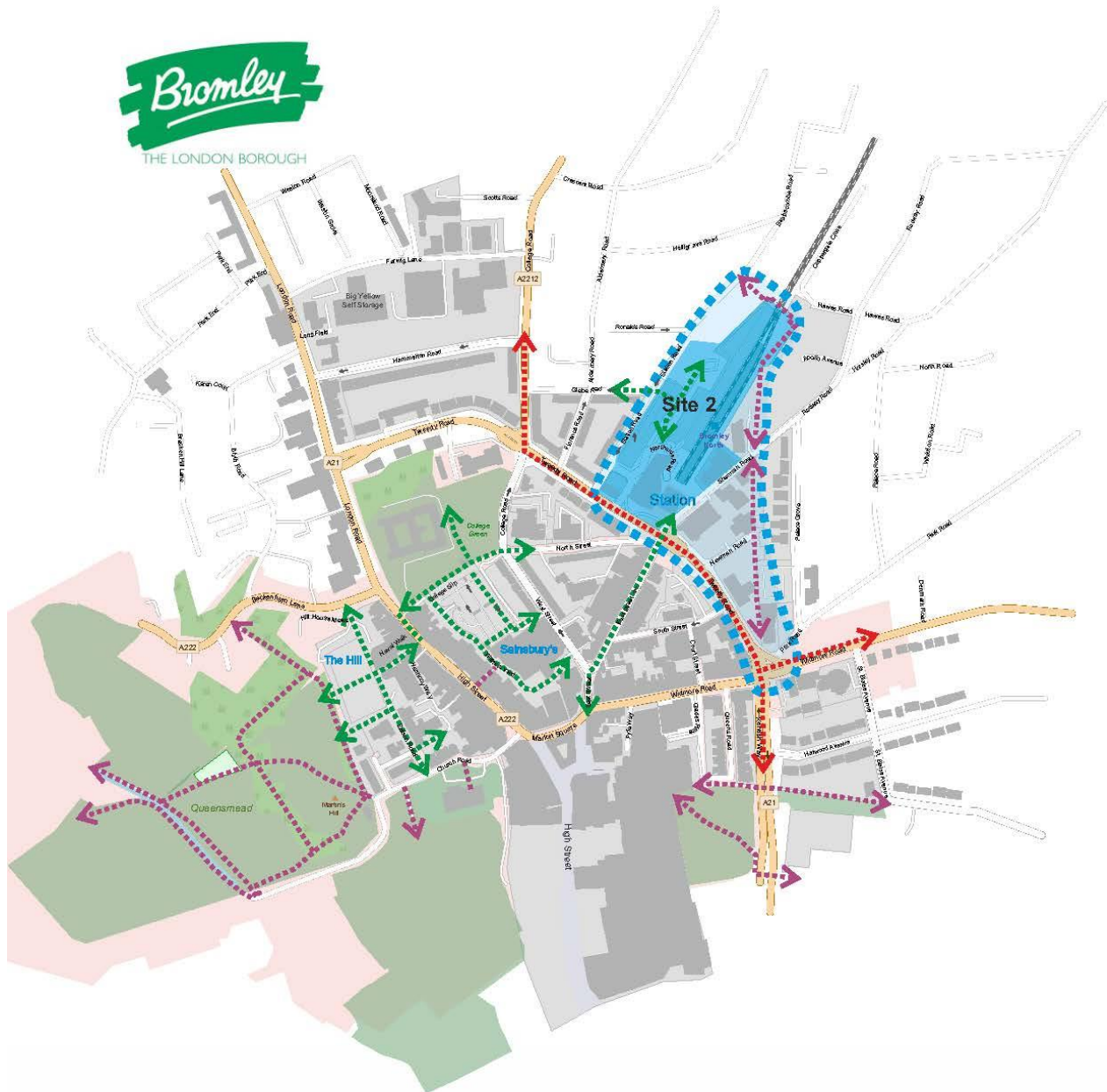
Site 2

- 6.6 **Proposals for the Bromley North site (Site 2) will be expected to provide a sensitive and effective transition between the adjoining low rise residential areas and the higher density town centre; and respect and enhance the setting of the Grade II listed Bromley North Station building. Taking into account the local context (including the proximity of the listed station building) and relevant reference heights, the Council considers that high density development of around 4 to 8 storeys would be appropriate for this location, potentially with a slightly taller maximum height for part of the site which does not exceed that of the existing 10 storey Northpoint House. Development proposals should accord with these height thresholds.**
- 6.7 Development of this scale would allow for the square in front of the station to become the heart of the sub-area, a functional, usable public space surrounded by development of a human scale. There is an opportunity for this square to reach across the road toward East Street and create connections to make the area a place to linger and dwell close to the station. This would support office, leisure and other commercial uses in the area, and could facilitate development of new or expanded office, leisure or commercial uses.
- 6.8 **Development on the western side of the railway line should respond to both the existing context to the west of the site and any future emerging context to the east. In particular, the relationship with the existing two storey properties on Station Road, Babbacombe Road and neighbouring streets to the west is key in terms of townscape and amenity impact.**
- 6.9 Development proposals for this site should accord with the following key parameters:









- Permeability through the sub-area (in accordance with inclusive design principles) will be a key consideration. Publicly accessible connections to and through the site should be explored, to improve pedestrian and cycling access and to create a pleasant and easily navigable environment.
- Development proposals should incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity.
- Development proposals should reference the existing context and character of the area which includes several notable civic buildings which should inform the choice of materiality and detailing for new development and/or the redevelopment of existing buildings.
- A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be considered for Northside House and Northpoint House, should these buildings come forward for redevelopment. However, Northside House currently restricts permeability and connectivity to Bromley North Station; as such, the redevelopment of this building may be appropriate as part of a wider placemaking vision.

Figure 5: Bromley North Gateway sub-area

OpenStreetMap ©



Bromley North Sub Character Area

- | | | | | | |
|---|--------------------|---|------------------|---|---|
|  | Sub character area |  | Site allocation |  | Conservation Area |
|  | Footpath |  | Cyclepath | | |
|  | Key connection |  | Urban Open Space | |  |

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North Village

- 6.10 This sub-area is covered by the Bromley Town Centre conservation area and has a distinct historic character. The area includes significant concentrations of retail and leisure uses, particularly along East Street, Widmore Road and at the Sainsbury's site accessed from West Street. These uses are in close proximity to low-rise residential uses.
- 6.11 Bromley and Sheppard's College, a Grade I Listed building, lies to the north of the sub-area, surrounded by College Green, an important green open space in terms of recreation and biodiversity.
- 6.12 The Grade II listed Bromley Old Town Hall is located to the east of the sub-area, on Widmore Road. Planning permission was granted in 2021 to convert the Old Town Hall building to a hotel, with new residential development on the adjacent car park site²⁵.
- 6.13 Opportunities for new development in the sub-area should be sensitively balanced with the aim to protect and enhance the sub-area's historic character, townscape and listed buildings. The Bromley Town Centre conservation area SPG will be a strong material consideration in the determination of planning applications within this sub-area; and also, for applications outside the sub-area which may affect its setting or detract from views into or out of the area.
- 6.14 There may be opportunities for small-scale and infill residential and/or commercial development on primary streets in the area, including upwards extensions of existing buildings. Where such opportunities do come forward, any increase in height should be modest and reference prevailing heights in the vicinity, which is generally two to three storeys. Developments of a similar height may be acceptable subject to detailed design considerations.
- 6.15 In terms of acceptable uses, it is expected that any proposals that do come forward would maintain an active frontage at ground floor level for retail, leisure, night-time economy uses or other commercial uses, particularly along East Street, High Street and Widmore Road. On upper floors, residential use may be appropriate where such uses can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 6.16 Opportunities to enhance College Green, in terms of improved links to and through the space or expansion of the space itself, should be considered as part of new development proposals. Urban greening, particularly new street trees, will be supported, whilst maintaining a clear pedestrian thoroughfare in line with inclusive design principles.
- 6.17 The public realm in the area is of good quality, with recent improvements around East Street creating an attractive and pedestrian-friendly retail and leisure environment. Further public realm improvements will be supported where they lead to improved pedestrian accessibility and more inclusive design. Increases in pavement activity and outdoor facilities linked to restaurants, bars or pubs are acceptable in principle, as they can help to support the vitality and viability of these uses, but they should not lead to adverse impacts for pedestrian access and connectivity.

Development opportunities

Sainsbury's site and Walters Yard

²⁵ Planning permission reference: 19/03545/FULL1









- 6.18 The Sainsbury's store and car park occupies a significant site at heart of the sub-area. There could be an opportunity to redevelop this site for mixed-use retail and residential development, with provision of improved links across the town centre and new green spaces linking to College Green.
- 6.19 The protection and enhancement of the historic environment is a key requirement. Development proposals should respond appropriately to the local context, which is characterised by low-rise buildings. The Council considers that low to mid-rise development, predominantly 2 to 3 storeys but with potential for taller 4-5 storey elements where designed and sited sensitively, would be appropriate in this location.
- 6.20 Development proposals should seek to improve the interface with the surrounding streets, stitching new connections into existing street patterns. The current Sainsbury's store presents a blank frontage onto a large part of West Street. New development should seek to create an active frontage along West Street, with high quality public realm linking north to College Green and south towards the High Street/Market Square.
- 6.21 The existing car park could be rationalised and repurposed for improved public realm and green infrastructure opportunities, provided that any adverse impacts that may arise due to the loss of the existing parking and servicing space are mitigated. Limited development may be acceptable on the southeast part of the car park adjacent to the current store's location; however, the site should retain a sense of openness to avoid adverse impacts on College Green and Bromley and Sheppard's College. There may be potential to create a continuous publicly accessible green space linking any new development with College Green.
- 6.22 Improved public realm should be prioritised along Walters Yard. Currently, this road is used for servicing access for Sainsbury's, and servicing and parking for shops on the High Street. There may be opportunities to utilise this space to create new areas of activity and help facilitate improved vitality and viability on the High Street itself, although such opportunities should be balanced with any continuing need for servicing access. This could include measures such as pocket parks, improved greening and outdoor seating, which offer a place to dwell and relax for people visiting the town centre. Opportunities for improved permeability through to the High Street should be explored.

Figure 6: North Village sub-area

OpenStreetMap ©



North Village Sub Character Area

- | | | | | | |
|---|--------------------|---|------------------|---|---|
|  | Sub character area |  | Site allocation |  | Conservation Area |
|  | Footpath |  | Cyclepath | | |
|  | Key connection |  | Urban Open Space | |  |

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North High Street

- 6.23 This sub-area has a linear boundary which runs along the High Street from Market Square and then along London Road up to the junction with Tweedy Road. It also includes parts of Church Road and Beckenham Lane. The sub-area is largely covered by the Bromley Town Centre conservation area.
- 6.24 The sub-area includes several heritage assets including the Grade II* listed Church of St. Peter and St. Paul, the Grade II listed Partridge Public House and Royal Bell Public House. The Royal Bell has planning permission for the refurbishment of the public house and an extension to provide a new nine storey hotel development²⁶. The Grade I listed Bromley and Sheppard's College, which is within the North Village sub-area, is also in close proximity.
- 6.25 There are a number of office and commercial buildings along London Road to the north of the sub-area. These areas are covered by a Business Improvement Area under Local Plan policy 84. The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.
- 6.26 North High Street also includes a Local Plan site allocation - Site 3, Hill Car Park and Adjacent Lands. Local Plan policy 1 and appendix 10.2 identify the site for 150 residential units. Development proposals will be expected to respect the local historic character and heritage assets; integrate the site into the wider town centre; and minimise adverse impacts on the designated Local Green Spaces of Martins Hill and Church House Gardens to the west.
- 6.27 This sub-area has a strong commercial function, with a number of office, retail and leisure uses (including several independent businesses). This commercial function should be maintained and enhanced, through protection of existing frontages and commercial uses, and prioritising new uses where development comes forward. New commercial uses could include provision of smaller retail units conducive to occupation by independent operators, and a range of different office/workspace typologies (for example, co-working space).
- 6.28 On upper floors along the High Street, residential use may be appropriate where such uses can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers.
- 6.29 There may be opportunities for small-scale and infill residential and/or commercial development along and to the rear of the High Street, including upwards extensions of existing buildings. Where such opportunities do come forward, any increase in height should be modest and reference prevailing heights in the vicinity, which is generally three to four storeys. Developments of a similar height may be acceptable subject to detailed design and heritage impact considerations.
- 6.30 Development proposals should seek to improve east west connections, particularly connections between the High Street and Church House Gardens.
- 6.31 There may be opportunities for utilising parts of backland sites, particularly along Harmony Way and other areas to the rear of the western side of the High Street, to provide outdoor facilities linked to restaurants, bars or pubs, or provision of new workspaces; this could help to

²⁶ Planning permission reference: 18/03252/FULL1

support the vitality and viability of these uses. Such opportunities should not lead to adverse impacts for pedestrian access and connectivity.

- 6.32 Development proposals should respond to the existing context and character of the area which should be used to inform the choice of materiality and detailing for new development and/or the redevelopment of existing buildings. Scale and materiality should be carefully considered and sympathetic to that of the North Village character area.

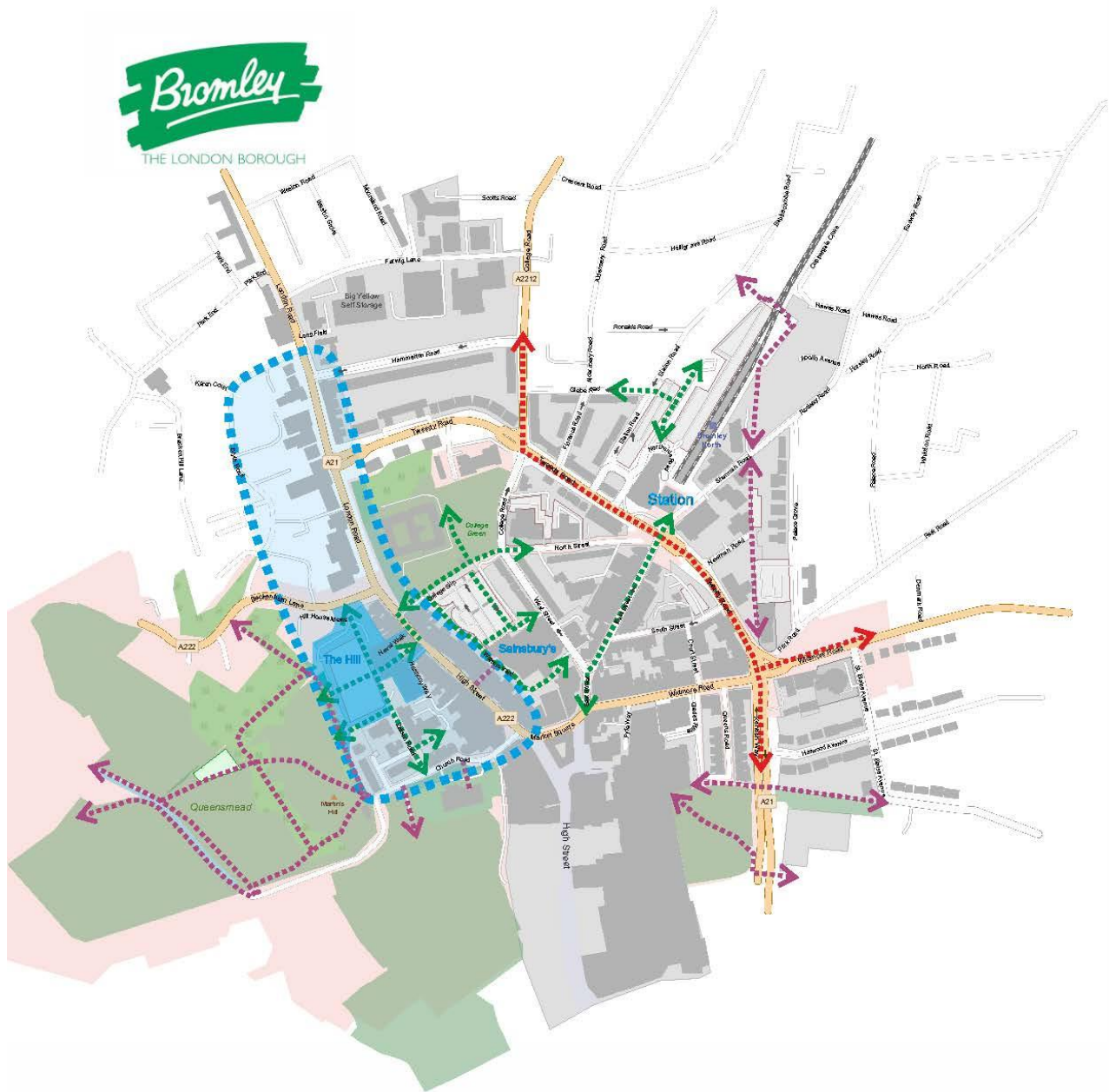
Development opportunities

Site 3

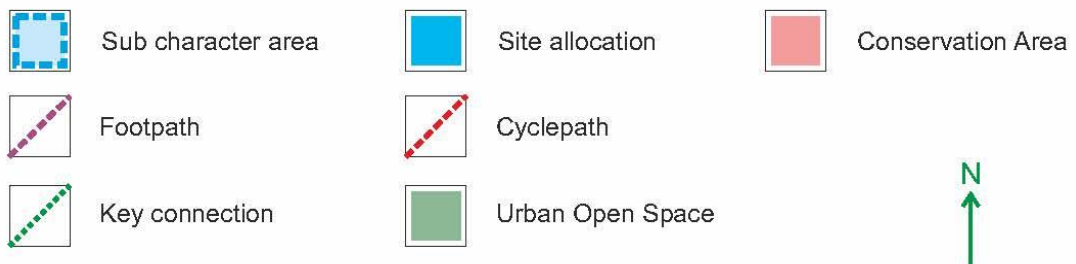
- 6.33 Site 3 is currently occupied by a large multi-storey car park (three storeys in height). The site occupies a prominent position at the top of Beckenham Lane, hence consideration of the topography of the site will be key, especially in relation to building heights.
- 6.34 The site is adjacent to three storey residential development immediately to the west, with predominantly three storey buildings fronting the High Street to the east. Respecting the scale of existing buildings should be a key design consideration of any future development proposal on the site. A maximum height of four to five storeys may be acceptable subject to appropriate scale and massing and detailed design considerations.
- 6.35 Activation at the corner of Beckenham Lane and Bromley High Street through provision of commercial uses is encouraged, potentially coupled with utilising the rear of High Street properties to complement retail and leisure uses on the High Street.
- 6.36 Improvements to public realm and improved permeability will be a key consideration for any future development, to better integrate the site into the town centre as per the requirements of the site allocation. In particular, development of site 3 offers potential for a new North-South route along Edison Road; and east west route providing a direct connection to Martins Hill. New routes should seek opportunities for greening where appropriate.
- 6.37 The site is entirely surrounded by the Bromley Town Centre conservation area, although it is not within the conservation area itself. The statutorily listed Swan and Mitre Public House, and local listed Bromley Picturehouse are also immediately adjacent to the site boundary. Any development within site 3 must have regard to these important heritage assets, preserving and enhancing their setting as well as ensuring that development does not detract from any key views to or from the assets in question.
- 6.38 The site allocation seeks car parking for public use and for any future residents. The allocation pre-dates the London Plan which requires car-free development in Metropolitan town centres; therefore, it would be expected that any future residential units would be car-free (with the exception of disabled parking provision). In terms of the existing public parking, loss of existing provision may be acceptable, particularly where this would help to optimise development on the site and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 6.39 The architectural language should reference the character and materiality of the surrounding town centre locality, particularly the prominent use of red brick.

Figure 7: North High Street sub-area

OpenStreetMap ©



North High Street Sub Character Area



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7. Bromley West

High Street

- 7.1 The High Street sub-area encompasses the main pedestrianised section of Bromley High Street, from Market Square in the north to Bromley South Station in the south. The sub-area has a strong commercial character, particularly retail and leisure uses; it is a key reason for the town centre's 'Metropolitan' status, alongside the Glades Shopping Centre.
- 7.2 The historic Bromley Charter Market operates at the north of the sub-area, around Market Square, every Thursday, Friday and Saturday. The ongoing operation of the market is an essential component of a well-functioning, attractive and diverse town centre; any development which risks the ongoing operation of the market will be resisted.
- 7.3 The Churchill Theatre and Library is a key cultural use located just off the High Street. **The building itself is a designated local landmark, which means that developments are required to protect or enhance the quality of views of the building. New development should be subservient to Churchill Theatre and Library, so as not to diminish its presence as a civic landmark building.**
- 7.4 The High Street sub-area also includes the majority of Local Plan site allocation 10, West of Bromley High Street and land at Bromley South. Local Plan policy 1 and appendix 10.2 identify the site for 1,230 residential units, offices, retail and a transport interchange. Any proposals will be expected to incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location; improve Bromley South Station; provide a high-quality public realm and accessibility to and through the site; provide an attractive and active frontage to the High Street; and be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.
- 7.5 The High Street should remain a predominantly commercial area given its importance to the town centre commercial offer. However, some diversity of commercial uses could be acceptable, for example the introduction of new office, leisure, sports or community uses, pending assessment of any amenity impacts and provided the overarching retail function of the centre is retained. An element of residential uses may be acceptable at upper floor levels, provided they do not cause adverse impacts on existing commercial uses; adverse impacts could arise through the loss of commercial space (including ancillary space), and by introducing noise sensitive uses in close proximity to existing commercial uses. Agent-of-change considerations will be important when assessing any residential uses.
- 7.6 There may be opportunities for upwards extensions of existing buildings along the High Street, to facilitate new residential and/or commercial uses; proposals for residential uses should demonstrate that they can be accommodated without affecting the operation of adjacent commercial uses and where high-quality residential units are provided which provide a good level of amenity for future occupiers. Where upwards extensions do come forward, any increase in height should be modest and reference prevailing heights in the vicinity, which is generally three to four storeys. Developments of a similar height may be acceptable subject to detailed design considerations.
- 7.7 **The High Street has an established pattern of built form characterised by a lower well-structured urban edge (typically three to four storeys) with taller elements set-back behind.**

Taller blocks set behind lower finer grain buildings is a clearly distinguishable feature of this sub-area; the human scale feel of the High Street contributes to its unique character which should be retained and reinforced.

- 7.8 New development which includes taller elements should follow this pattern; ensuring the form and massing of the buildings is set back from the main High Street frontage and sensitive to the ridge profile of the town centre topography.
- 7.9 This form reinforces a sense of townscape continuity, value, and coherent streetscape pattern; it is important to avoid disjointed breaks from inappropriate height and scale which would disrupt the established urban pattern and negatively impact on local character and identity.
- 7.10 New development should also respond to the low-rise residential character of the existing neighbourhood. In particular, development should step down in scale to address the existing residential neighbourhood to the west. Transitions in height and scale should be sympathetic and proportionate.
- 7.11 Development proposals in the southern part of Site 10 should acknowledge and respond to local context; however, they should not be competing with the tallest stand-alone buildings in Bromley South in terms of height and scale. It should be noted that Bromley South has a very different character to the High Street and the town centre; the Churchill Theatre is considered to be a more appropriate benchmark for proposals in the High Street sub-area (as the tallest building in the town centre which has a civic role). Development which seeks to exceed this height will require a strong townscape justification.
- 7.12 Improving connections within the town centre and to its surroundings is key to ensuring that the town centre can continue to function effectively and remains an attractive environment for pedestrians. In particular, improved east west permeability – to Church House Gardens in the west, and Queens Gardens and the Civic Centre to the east – is a key opportunity and such improved connections should be considered as part of any relevant development proposals.
- 7.13 There may also be potential for improved north-south connections, both improvements to existing routes and potential for the creation of new routes; the delivery of Site 10 in particular offers potential for the creation of new routes parallel to the High Street. Any new routes should prioritise urban greening and create an accessible playable environment; new routes may also create potential for additional commercial activity, either through new uses or through space to support existing High Street uses.
- 7.14 The High Street has an eclectic mix of architecture, composed of buildings of multiple eras, styles, materials and scales. The character of the Bromley Town Centre conservation area and various listed and locally listed buildings will be key considerations for the design of development proposals in the sub-area. Whilst there is no single definitive architectural style within the High Street, development proposals should seek to reference aspects of the surrounding context to inform an appropriate design language. Materiality and architectural detailing is key in this regard, taking cues from local character and context to ensure that new development does not appear unrelated or alien within the streetscene.

Development opportunities

- 7.15 Site 10 is the key development opportunity within the sub-area, but this site is made up of a series of smaller sites. The allocation expects proposals within the site 10 boundary to be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site. This SPD provides broad guidance which would help

to fulfil part of this masterplan role, i.e. it sets out key design principles which development should accord with and guidance for the sub-areas which the allocation is within.

- 7.16 Individual development sites within the site 10 boundary should not be designed in isolation; development proposals will be expected to demonstrate that they have considered the site in question holistically in order to deliver the allocation requirements, setting out clearly how each site relates to other existing sites within the site 10 boundary including sites which have permission or plans to redevelop. There is no set form that this information should take, although it is expected that it should include evidence of engagement with relevant landowners of other sites. Use of visuals and 3D modelling is encouraged to clearly indicate the relationship that a proposed development will have with other existing and planned development in the allocation boundary.
- 7.17 Development must respect the landscape character of the Church House Gardens to the west.

Site 10 (Churchill Quarter)

- 7.18 The Churchill Quarter sits at a key location within Bromley Town Centre, adjacent to the Churchill Theatre and linking the open green space of Church House Gardens to the High Street. Development proposals should seek to enable greater east-west permeability into and across the site to improve the relationship between the High Street and Church House Gardens.
- 7.19 New development should seek to provide a mix of commercial uses at ground floor level to support the creation of new public realm and amenity spaces. Existing community facilities such as the Bromley Town Church should be re-provided on-site or relocated within the town centre in an area of at least equal accessibility.
- 7.20 The scale and massing should respond to the existing context, focusing height within the centre of the site where there is less sensitivity, particularly with respect to lower-lying areas in the vicinity given the higher ground location of the site. Careful consideration should be given to how larger blocks are experienced at ground level and perceived in townscape terms; ground floor animation and 'visual breaks' in the skyline will be particularly important to avoid the appearance of an unbroken 'wall of development'.
- 7.21 The Council considers that maximum building heights should be proportionate to that of the Churchill Theatre – an important local landmark at around 10 storeys – although this would be subject to detailed design considerations. Building heights should step down towards the north and south in response to Church House Gardens and Ethelbert Road. The relationship with Ethelbert Road should be carefully considered in order to avoid an abrupt transition in scale.
- 7.22 Development should be of a high architectural quality, informed by local character and respectful of the adjacent conservation area setting. Referencing local context with site specific architectural detailing is key.
- 7.23 Development proposals should provide high quality amenity space proportionate to the scale and quantum of development proposed. There is an opportunity to create a new piece of public realm to the south of the Churchill Theatre to support civic and/or community uses, the design of which should respect the strong landscape character of Church House Gardens.
- 7.24 The creation of a hierarchy of spaces across the site each with their own function and character is encouraged. Further public realm improvements to Library Gardens should be incorporated into any future comprehensive re-development of the site.

Site 10 (other sites)

7.25 In addition to the guidance provided above on height, scale and massing, the following parameters apply to all other sites within the site 10 boundary, noting the overarching need for any individual sites to consider how they fit with the delivery of site 10 holistically:

- Development proposals should incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity.
- A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where sites come forward for redevelopment. Such an approach may be particularly suitable for those buildings on the western side of the High Street, from the corner of Ethelbert Road.











NO REFERENCE TO IMPACT ON LIBRARY GARDENS

Figure 8: High Street sub-area



High Street Sub Character Area

- | | | | | | |
|---|--------------------|---|------------------|---|---|
|  | Sub character area |  | Site allocation |  | Conservation Area |
|  | Footpath |  | Cyclepath | | |
|  | Key connection |  | Urban Open Space | |  |

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





Church House

- 7.26 This sub-area is framed around Church House Gardens, a unique green space which adds significant value to the Bromley Town Centre offer, for residents, workers and visitors alike. It is designated as an Urban Open Space in the Local Plan, as it provides an important break within the surrounding built-up area. The majority of the area is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 59).
- 7.27 A designated SINC covers the majority of the area, which includes sites with biodiversity value. It is also almost entirely covered by the Bromley Town Centre conservation area.
- 7.28 Improved connections through the park, particularly to the High Street, is a key objective, and should be prioritised as part of any improvement works or as part of development in the vicinity (such as Site 10 in the High Street sub-area). New connections should prioritise greening interventions and support improved biodiversity.
- 7.29 The River Ravensbourne runs north-south along the western edge of the park, partly culverted. Greater utilisation of the Ravensbourne is supported, in terms of increasing functionality and access and making it more prominent within the wider landscape (including de-culverting), although this would be dependent on available funding.
- 7.30 The large number of constraints makes development in the park unlikely, particularly any large-scale development. The former Council depot site to the northeast of the park may be suitable for development, consistent with its designation as an Urban Open Space; suitable development is likely to be small-scale, reflecting the current building footprint. Any development on the depot site must have regard to the setting of the Grade II* Listed Church of St. Peter and St. Paul immediately to the north. The site also has limited means of access through public parkland or via Tetty Way, a narrow service road with no adjacent footpath which along with significant level changes creates a poor pedestrian environment.
- 7.31 It is important that the sensitivity of the setting is reflected in the scale, type and architectural approach of any future development proposals; building on the 'urban edge' of the park and retaining an open aspect to the south and west to retain the openness of the 'wider' park setting would be a more favourable approach. Given the significant constraints, the site is considered to be more suited to cultural/community use facilities linked to the existing park amenities and amphitheatre rather than a separate self-contained residential development.
- 7.32 Although the depot site is a private site, there is little to distinguish it from the wider Church House Gardens. Where development does come forward on this site, the creation of new green, functional, publicly accessible parkland should be a key priority.
- 7.33 Use of the amphitheatre for cultural uses is supported. This could have positive impacts for the wider town centre, although any significant intensification of use must prevent adverse impacts on Church House Gardens, particularly any impacts on ecology and biodiversity.
- 7.34 The sub-area also includes roads to the south of Church House Gardens - Ethelbert Road, Ravensbourne Road and Ringers Road. These roads largely consist of semi-detached dwellings but have larger-scale buildings nearer to the High Street. Any development in this part of the sub-area should reflect the existing low-rise character and the landscape character of Church House Gardens. Sites at the High Street end of these roads (namely those within the Site 10 boundary) should be assessed using the guidance set out in the High Street sub-area, as these sites accord more with the character of the High Street sub-area.

Figure 9: Church House sub-area



Church House Sub Character Area

- | | | | | | |
|---|--------------------|---|------------------|---|---|
|  | Sub character area |  | Site allocation |  | Conservation Area |
|  | Footpath |  | Cyclepath | | |
|  | Key connection |  | Urban Open Space | |  |

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8. Bromley East

The Glades & Elmfield Road

- 8.1 The Glades & Elmfield Road sub-area includes two of the most significant commercial areas in the Borough. The Glades Shopping Centre is a key retail and leisure destination which forms a key part of the justification for Bromley's Metropolitan town centre status. The Pavilion Leisure Centre adjoins the Glades and provides important leisure facilities including a swimming pool.
- 8.2 Queens Gardens is an important green space adjacent to the Glades. It is designated as an Urban Open Space in the Local Plan, as it provides an important break within the surrounding built-up area. The majority of the area is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 62). It is also within the Bromley Town Centre conservation area.
- 8.3 Elmfield Road has a number of office and commercial buildings, covered by a Business Improvement Area under Local Plan policy 84. The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted. New office development is strongly encouraged where sites come forward for redevelopment.
- 8.4 Several buildings on Elmfield Road have planning permission for redevelopment or are subject to live applications. Wells House²⁷ has planning permission for demolition of an existing office building and the construction of a new building providing over 10,000sqm of office floorspace. Prospects House has planning permission²⁸ for demolition of an existing office building and the construction of a mixed-use building providing around 1,700sqm of Use Class E(g)(i) office floorspace and 61 residential units.
- 8.5 The balance of uses on recent applications on Elmfield Road has strayed towards residential-led mixed-use, which, if it continues, could fatally undermine the function of the Business Improvement Area. The Council strongly encourages commercial or commercial-led schemes in this area in order to maintain the areas business function. Elements of other uses may be acceptable where they do not threaten this function. Policy D13 of the London Plan (relating to agent of change) states that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. This could be particularly relevant where residential uses are proposed in close proximity to existing office/commercial uses.
- 8.6 The Glades currently acts as a significant barrier to east-west connectivity across the town centre, with a large section of inactive frontage facing Queens Gardens. Interventions to improve connectivity and activate frontages are supported; such interventions should seek to maximise greening and biodiversity and create playable environments.

²⁷ Planning permission reference: 19/03620/FULL1

²⁸ Planning permission reference: 20/04296/FULL1

- 8.7 In terms of land uses, the Glades should retain a commercial character given its importance to the town centre commercial offer. However, some diversity of commercial uses could be acceptable, for example the introduction of new office, leisure, sports or community uses, pending assessment of any amenity impacts and provided the overarching retail function of the centre is retained.
- 8.8 The Glades has an extensive car park which serves the Glades itself and the wider town centre. Loss of existing provision may be acceptable, particularly where this would help to optimise the site for development of new uses and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 8.9 The Bromley Town Centre conservation area surrounds the Glades on three sides. Any development of the Glades, be that limited enhancements of the existing building, or partial or wider redevelopment, should address this 'gap' in the conservation area by referencing key features of the conservation area to inform heritage-led proposals. Any development must have regard to the amenity of adjacent residential uses at Queens Road and Lownds Court.
- 8.10 Increased activation of the Queens Gardens frontage is supported. Currently, the Glades presents a large expanse of blank frontage onto Queens Gardens. Opportunities for new or improved connections from Queens Gardens to the Glades and through to the High Street should be explored.

Development opportunities

The Mall

- 8.11 The potential redevelopment of The Mall provides an opportunity to support the Business Improvement Area designation set out in the Local Plan, which could have wider benefits for the town centre as a whole. New office uses are considered to be the most appropriate development in terms of enhancing this function, therefore the Council strongly encourages an office-led scheme.
- 8.12 In terms of design, development at this site should improve permeability across the site from east to west which is currently inhibited by the existing large building footprints, creating a physical barrier between the High Street and Elmfield Road.
- 8.13 Future development proposals will be expected to consider wider movement patterns (both existing and emerging) in order to improve legibility and permeability and to help stitch new development into the existing urban fabric.
- 8.14 This site forms part of a larger urban block with street frontages and key junctions on all 4 sides which should be suitably framed by built form. The site should be considered in its entirety as part of a coherent whole regardless of individual site/land ownership issues.
- 8.15 The scale and height of new development should respect the established townscape hierarchy with buildings stepping down to the east to provide a transition in scale between the taller elements of the town centre and the low-rise residential properties east of Kentish Way.
- 8.16 The principle of concentrating taller elements to the north following a gradual transition in scale from the south as reflected by recently consented schemes on the eastern side of Elmfield Road is accepted in principle subject to detailed design considerations. The height of the existing building (around 12 storeys) is considered appropriate in this location;

development proposals which seek to exceed this height would require a strong townscape justification.

- 8.17 The relationship between buildings and spaces is key; there is an opportunity for future landscape proposals to stitch into the emerging public realm improvements along Elmfield Road and to enhance the existing public realm fronting the Glades Shopping Centre.

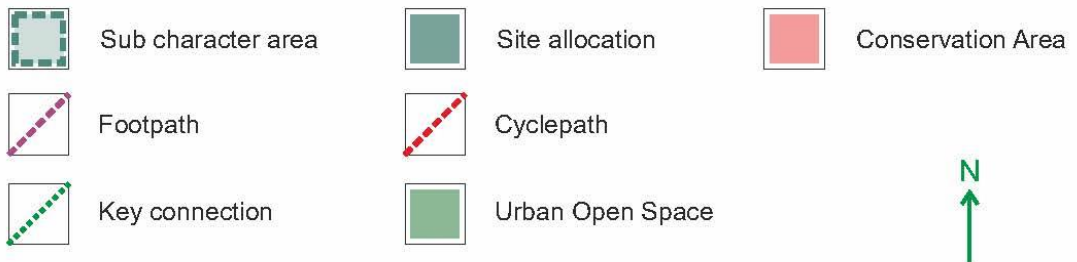
Elmfield Road (general)

- 8.18 In line with the area's Business Improvement Area designation, opportunities for new office floorspace are strongly encouraged. A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where buildings come forward for redevelopment.
- 8.19 Buildings on Elmfield Road should follow a consistent pattern in terms of building heights, respecting and responding to the established townscape hierarchy. Building height and massing should be appropriate both in terms of the relationship with neighbouring buildings (immediate context) and the relationship with the wider context (townscape/skyline). The Council considers that development of around 7 to 10 storeys would be appropriate on Elmfield Road, subject to townscape impact and detailed design considerations.
- 8.20 Elmfield Road slopes down from north to south, which should be a key factor determining suitable building heights and massing. Heights should be stepped gradually following the topography; the transition in heights from north to south should be proportionate to that of the neighbouring buildings (which may include schemes which have been permitted but not yet built).
- 8.21 Buildings should step down to the east to provide a transition in scale between the taller elements of the town centre and the low-rise residential properties east of Kentish Way (Palace Estate).
- 8.22 All development proposals which come forward should accord with the following key principles:
- Improve permeability through the sub-area (in accordance with inclusive design principles) by exploring the potential for new connections to improve pedestrian and cycling access and create a pleasant, easily navigable environment.
 - Respond appropriately to the established townscape hierarchy to create a considered and coherent transition in scale from north to south and east to west.
 - Provide active frontages to animate the public realm on Elmfield Road and appropriate design measures to mitigate the impact on amenity from Kentish Way.
 - Adopt an integrated 'joined-up' approach to delivering landscape/public realm improvements on Elmfield Road by engaging with neighbouring landowners where possible.
 - Incorporate green infrastructure into the public realm and movement network to support rainwater management, reducing exposure to air pollution and increasing biodiversity. Opportunities to improve the pedestrian environment with street trees and urban greening should be maximised.

Figure 10: The Glades & Elmfield Road sub-area



The Glades and Elmfield Road Sub Character Area



Civic Centre / Palace

- 8.23 The Civic Centre / Palace sub-area encompasses the Bromley Civic Centre buildings and their surrounding grounds. The Civic Centre site includes the Old Palace, a Grade II Listed Building, and several other listed structures which are currently on Historic England's Heritage at Risk register. It also includes Ann Springman and Joseph Lancaster Halls (informally known as the 'Y Blocks') which were constructed in the 1960s and have been used for civic uses. Prior approval for change of use from office to residential use was granted in 2021²⁹.
- 8.24 The Civic Centre / Palace sub-area includes Local Plan site allocation 1, Bromley Civic Centre, Stockwell Close. Local Plan policy 1 and appendix 10.2 set out expectations for the site, split into three parts (A, B and C):
- Part A - Partial redevelopment of the northern section for civic centre facilities, offices and related activities. Retention of North Block, the Stockwell Building and the multi-storey car park.
 - Part B - Development of the central section for around 70 residential units, including the sensitive reuse of the Grade II listed Old Palace.
 - Part C - Retention of the south-eastern section as a public park.
- 8.25 The Old Palace grounds are designated as an Urban Open Space in the Local Plan, as they provide an important break within the surrounding built-up area. The eastern part of the grounds is also a designated Local Green Space, a designation akin to Green Belt which has particular value and significance to the local community because of special qualities identified in a Statement of Significance (set out in the Local Plan, Appendix 10.8, site 45). A designated SINC covers the majority of the area.
- 8.26 The allocation also expects proposals to retain public access across the site from Stockwell Close and Rafford Way and to minimise impacts on the Urban Open Space, Local Green Space, SINC and listed buildings. Improved pedestrian and cycling connections to the palace grounds, particularly from the main part of Bromley Town Centre to the west, is a key objective, and should be prioritised as part of any improvement works or as part of development in the vicinity. New connections should prioritise greening interventions and support improved biodiversity. Such improvements would ensure a significant positive impact on the local area's access to nature and open space, increasing the importance of the Old Palace grounds and their contribution to the wider town centre.
- 8.27 These improvements could also enable better integration of the Old Palace Grounds and Queens Gardens (within the Glades & Elmfield Road sub-area), which historically were part of the same landscape. Kentish Way is a significant barrier to physical integration of the spaces; however, through public realm works at street level to rebalance the space in favour of pedestrians and through provision of greening such as street tree planting, this could establish a strong visual continuity across Kentish Way.

Development opportunities

Site 1, Part A

- 8.28 Part A of the site allocation includes the Civic Centre car park and several buildings in office and civic use. The allocation seeks retention of these uses, although redevelopment may be acceptable. Any redevelopment must prioritise re-provision of existing civic and office uses. Other uses, such as social infrastructure uses and residential uses, may be acceptable as part of new mixed-use development, provided that these uses do not adversely impact the

²⁹ Planning permission reference: 21/03120/RESPA

continued successful functioning of the office and civic uses at the site (in line with the agent of change principle). The introduction of new uses, particularly residential uses, must also ensure a good level of amenity for future occupiers, for example, preventing or mitigating noise and disturbance.

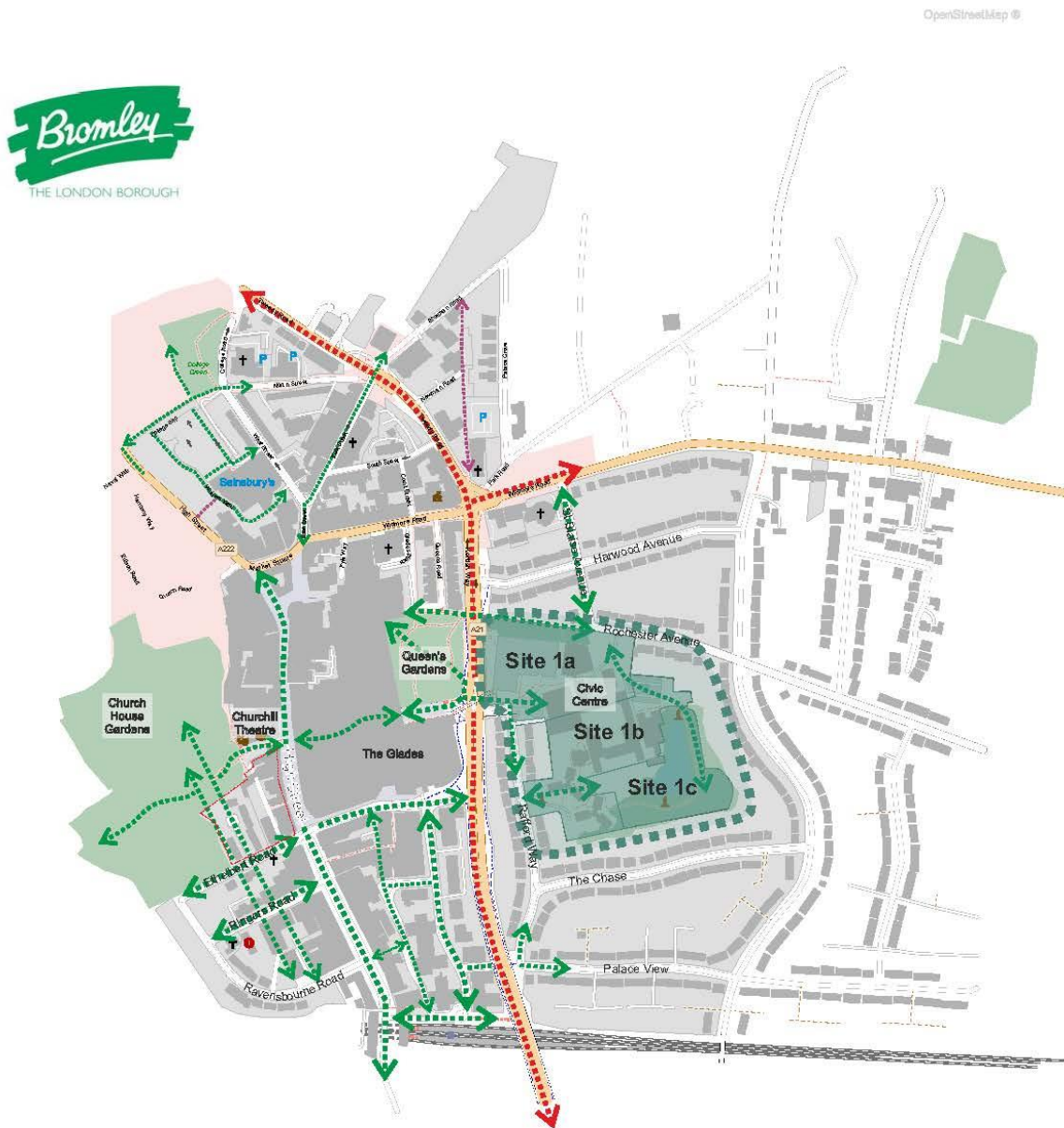
- 8.29 The site allocation seeks car parking for public use and for any future residents. The allocation pre-dates the London Plan which requires car-free development in Metropolitan town centres; therefore, it would be expected that any future residential units would be car-free (with the exception of disabled parking provision). In terms of the existing public parking, loss of existing provision may be acceptable, particularly where this would help to optimise development on the site and lead to better design outcomes. However, any proposal for loss of parking must be mindful of potential impacts on the function, vitality and viability of the town centre; evidence may be required to justify loss, for example a parking stress survey.
- 8.30 The site is adjacent to two storey semi-detached housing to the north and south. The Bromley Town Centre conservation area lies to the west (across Kentish Way) with the statutorily listed Bromley Old Palace and a designated SINC to the south-east. These constraints should form a key part of the design considerations of any future proposal on the site, particularly in terms of building heights. A maximum height of three to four storeys may be acceptable subject to appropriate scale and massing and detailed design considerations.
- 8.31 Redevelopment of this part of the allocation offers potential for improved connectivity across the Civic Centre site, particularly east-west connections. Connectivity improvements should be a key priority as part of any redevelopment.

Site 1, Part B

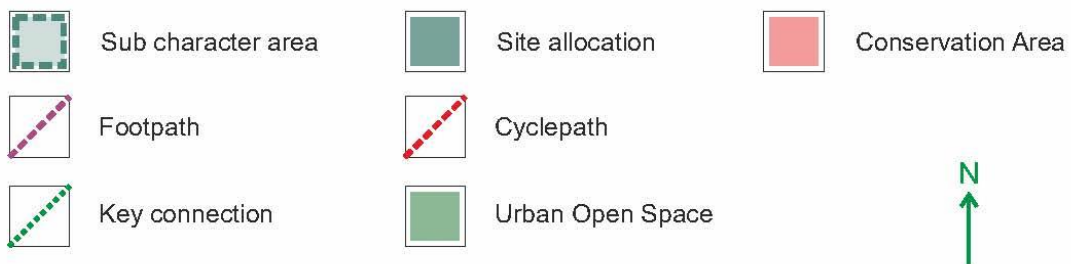
- 8.32 Part B includes the Old Palace and the Y Blocks. As set out in the allocation, the Old Palace should be retained, but sensitive re-use may be appropriate. Any re-use should not cause adverse impacts on the prevailing civic function of the Civic Centre site.
- 8.33 The Y Blocks has an extant prior approval permission to convert to 73 residential units. Any development of the Y Blocks, including extensions or larger-scale redevelopment, must have regard to the heritage assets in the immediate vicinity, particularly the Old Palace but also the various other listed structures; opportunities to improve the condition of these structures is encouraged, to enable them to be removed from the Heritage at Risk register.
- 8.34 The Urban Open Space designation means that any significant redevelopment must address policy 55 of the Local Plan. Where the replacement of existing buildings is proposed, any replacement buildings should not exceed the site coverage of the existing development.
- 8.35 The site constraints should form a key part of the design considerations of any future proposal on the site, particularly in terms of building heights. The current height of three storeys is considered generally acceptable, but there may be potential for a small increase in height up to four storeys - either through extensions or redevelopment - depending on the massing strategy, which should respond sensitively to the heritage setting, site topography, key views, and neighbouring residential properties.
- 8.36 Protection of the SINC should also form a key part of any development proposals. Measures to enhance the biodiversity value of the SINC should be investigated.
- 8.37 Any development must also ensure that the continued successful functioning of the office and civic uses at the site is not adversely affected (in line with the agent of change principle). The introduction of new uses, particularly residential uses, must also ensure a good level of amenity for future occupiers, for example, preventing or mitigating noise and disturbance.

- 8.38 Retention of public access across the site is a key requirement of the allocation. This is especially important in terms of access to the grounds, which are an important green and recreational asset for the town centre. Development of the Y Blocks could negatively impact on public accessibility by inadvertently creating a closed-off 'private' feel (real or perceived); such real or perceived barriers to access could reduce the wider use of the grounds. There may be an opportunity to improve the legibility of the existing public access route as part of future landscape proposals. Boundary treatments would require careful consideration.
- 8.39 Safety is also an important consideration; primary and secondary routes must be safe to use at various times of the day and night, utilising passive surveillance where possible. The provision of defensible space and privacy for any future occupiers of the Y Blocks would be a key requirement. It is essential that an appropriate balance is struck in order to achieve the aims of the allocation.

Figure 11: Civic Centre / Palace sub-area



Civic Centre / Palace Sub Character Area



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9. Bromley South

Bromley South

- 9.1 This sub-area is focused around Bromley South Station, a key transport hub for the Borough with excellent connections to other parts of Bromley, Central London and the wider South East.
- 9.2 The station is included within Local Plan site allocation 10, West of Bromley High Street and land at Bromley South³⁰. Local Plan policy 1 and appendix 10.2 identify the wider site allocation for 1,230 residential units, offices, retail and a transport interchange. Any proposals will be expected to incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location; improve Bromley South Station; provide a high-quality public realm and accessibility to and through the site; provide an attractive and active frontage to the High Street; and be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.
- 9.3 There are a number of office and commercial buildings in the sub-area, which are covered by a Business Improvement Area under Local Plan policy 84 (linking with the Business Improvement Area on Elmfield Road (within the Glades and Elmfield sub-area). The Council will seek to manage and improve the supply of high-quality office floorspace in these areas. Redevelopment proposals resulting in the loss of office floorspace or which compromise the primary function of the BIA will not be permitted.
- 9.4 The sub-area also includes a large Waitrose store with associated parking, and Bromley South police station and a number of commercial buildings along Mason's Hill. 1 Westmoreland Road is an allocated site for education in the Local Plan (Site 30).
- 9.5 There has been a significant amount of residential development within the sub-area in recent years, notably the 19 storey St. Mark's Square development to the west of the sub-area, and the 17 storey Perigon Heights development on St. Mark's Road. **These new buildings form a gateway to the town centre when approaching from the southwest and southeast.**
- 9.6 The Bromley Common Renewal Area begins on Mason's Hill close to the sub-area. Policy 16 of the Local Plan states:
- "Proposals within the Bromley Common Renewal Area will be expected to maximise opportunities to create a successful transition zone from Bromley Town Centre to the suburban and semi-rural urban fringe and produce a positive gateway to Bromley Town Centre along the Hayes Lane / Homesdale Road / A21(Bromley Common) junction, supported by appropriate green infrastructure."*
- 9.7 Policy 14 of the Local Plan concerns development affecting Renewal Areas, which could apply to proposals within the Bromley South sub-area. Development close to Renewal Areas are required to demonstrate that they maximise their contribution to economic, social and environmental improvements in the Renewal Area.

³⁰ The remaining (majority) part of the allocation is within the High Street sub-area.

- 9.8 The sub-area includes the Grade II listed former St. Mark's School and the locally listed St. Mark's Church. Development within sub-area should also respond to the need to preserve or enhance views as set out in the Local Plan, especially to Keston Ridge.
- 9.9 The sub-area features a mix of architectural styles and building heights. There may be opportunity for further tall buildings (6 storeys or 18 metres, and above) at the Waitrose site (see below). In other locations within the sub-area, buildings of up to six storeys may be acceptable, depending on proposed massing and consistency with other design policy requirements. Development proposals which seek to exceed this height would require a strong townscape justification. Any development must reflect the heritage assets at the south of the sub-area and the impact on local views. The sub-area immediately adjoins a large area of two storey residential properties which have a distinct suburban character; this character must also inform consideration of appropriate building heights.
- 9.10 A retrofit first approach - utilising existing buildings rather than demolishing and rebuilding them - should be prioritised where buildings come forward for redevelopment. This approach may be particularly suitable for buildings to the west of the sub-area, including Churchill Court.
- 9.11 Opportunities for improving pedestrian and cycling connections should be prioritised, both north-south connections to the rest of the town centre and improved connections to adjoining areas to the south of the town centre. Currently, the existing road layout acts as a barrier to connections from the south, particularly on Mason's Hill at the Westmoreland Road and Kentish Way junctions. Local Plan policy 35 identifies A21/Mason's Hill/Westmoreland Road junction capacity improvements to tackle congestion and facilitate new development. New development in the sub-area may be required to contribute to delivery of these improvements.
- 9.12 Public realm improvements around the station, including provision of new public realm as part of any development of the Waitrose and Bromley Police Station site, are key to ensuring high quality design. Public realm improvements should also seek to incorporate green infrastructure. Existing and emerging development should be stitched together with a clear hierarchy of routes and spaces reflecting pedestrian movement patterns and desire lines, improving connectivity and the street level experience between the High Street, Bromley South Station, and Masons Hill.

Development opportunities

Site 10 (Bromley South station)

- 9.13 Site 10 is the key development opportunity within the sub-area, which is made up of a series of smaller sites. The majority of site 10 falls within the High Street sub-area; Bromley South Station forms the remainder of site 10.
- 9.14 The allocation expects proposals within the site 10 boundary to be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site. This SPD provides broad guidance which would help to fulfil part of this masterplan role, i.e. it sets out key design principles which development should accord with and guidance for the sub-areas which the allocation is within.
- 9.15 Individual development sites within the site 10 boundary should not be designed in isolation; development proposals will be expected to demonstrate that they have considered the site in question holistically in order to deliver the allocation requirements, setting out clearly how each site relates to other existing sites within the site 10 boundary including sites which have permission or plans to redevelop. There is no set form that this information should take, although it is expected that it should include evidence of engagement with relevant landowners of other sites. Use of visuals and 3D modelling is encouraged to clearly indicate

the relationship that a proposed development will have with other existing and planned development in the allocation boundary.

- 9.16 Bromley South Station is a civic focal point within the town centre, where many town centre visitors arrive. High quality public realm is therefore a key priority, potentially through the creation of a public square, to strengthen the role of the station as a civic space and to support improved connections to the south. **The principle of small-scale retail and leisure uses fronting improved public realm is supported.**
- 9.17 In terms of larger-scale redevelopment of the station, this is supported in principle but would be a longer-term proposal given the complex nature of the site and the need to mitigate impacts on the operation of the station. Potential for mixed-use redevelopment will be explored as part of the preparation of the new Local Plan, in discussion with Network Rail and other key stakeholders.

Waitrose and Bromley Police Station

- 9.18 New development proposals should acknowledge that the surrounding context is changing significantly and respond accordingly. **These sites should not be seen as stand-alone sites considered in isolation; they are part of a larger urban block which is evolving. The historic prioritisation of vehicular movement, blank building frontages which 'turn their back' on adjacent developments, and peripheral public realm spaces are no longer appropriate. Proposals which seek to simply replicate existing site conditions will not be supported.**
- 9.19 Pedestrian movement should be a key driver in determining the optimum site layout for future development proposals, which should reflect desire lines and movement patterns based on both the existing and emerging context. It is important to establish a clear hierarchy of routes; movement to and through these sites is key and should align with the wider urban design objective of improving connectivity (and street level experience) from the station to Masons Hill.
- 9.20 **Careful consideration should be given to the relationship with any recently permitted or constructed neighbouring residential/mixed-use schemes – e.g. Perigon Heights - in terms of layout, height, scale and massing. In response to the emerging context, there is an opportunity to rethink the existing Waitrose store servicing access arrangements and vehicular access/roads serving the Police Station to align more closely with the changing character of St. Mark's Road and new public realm spaces.**
- 9.21 **The opportunity for taller buildings marking the station and edge of the town centre to signify a sense of arrival at Bromley South is accepted in principle subject to detailed design considerations. The Council considers that the Waitrose site could potentially accommodate taller buildings as townscape and wayfinding markers.** However, building heights should step down towards the eastern and southern edges in response to the lower rise character of the High Street and Masons Hill environs.
- 9.22 The height, scale and massing of new development proposals should respond to both the immediate site setting (establishing an appropriate relationship with existing buildings) and the wider townscape context of Bromley Town Centre (recognising existing townscape principles/tall building hierarchy and safeguarding key views).

Site 30

- 9.23 Site 30 – 1 Westmoreland Road – **is allocated, in whole or in part, for education use.** A mix of uses including education may be suitable on the site; given the Business Improvement Area

designation of the site, offices uses should be prioritised. An element of residential use may also be suitable.

- 9.24 Where education uses are provided as part of a mixed-use development, there must be clear evidence that the different uses on site can function effectively, without adverse impacts. Partial education use should not be tokenistic and should address education needs in the borough. The Council will expect applications to be accompanied by evidence of education need, including evidence of discussions with the Council's Education Team as well as any other relevant stakeholders.
- 9.25 Proposals including no education provision would not address the site allocation and would also be contrary to Local Plan policy 27(b), which safeguards such allocations for education purposes for the period of the plan. The Council is commencing a review of the Local Plan which will include a review of existing site allocations; however, proposals for alternative uses in the meantime would need to be supported by robust evidence demonstrating that circumstances have changed since the allocation was adopted and that the loss of the site will not impact current or future education needs. Any evidence submitted must include evidence of discussions with the Council's Education team as well as any other relevant stakeholders; such evidence could be a material consideration with regard to the non-provision of education uses.
- 9.26 There is an opportunity for new development proposals to improve the relationship with the street (with an active frontage and permeable links); respond to the emerging context of Bromley South and provide an appropriate gateway marker to the High Street (with appropriate scale and massing); and to transform the existing car-dominated setting (with high quality landscape and amenity space).
- 9.27 The geometry of the site may lend itself to one or more blocks; where larger linear blocks are proposed efforts should be made to break up the massing whilst maintaining a strong relationship with the street. The need to retain access to a culvert running through the centre of the site is a key constraint that would need to be considered.
- 9.28 The site is a key node where the High Street, Westmoreland Road, and Masons Hill intersect and is therefore considered to be a suitable location for a taller element to provide a visual marker – marking the end of the High Street. The Council considers a maximum height of 8-9 storeys to be appropriate for this setting in order to mediate between the surrounding contrasting scales (subject to detailed design considerations).
- 9.29 Building heights should step down towards the east and the south to respond to the surrounding low-rise context, breaking up the massing with variations in height to avoid the perception of a large 'barrier' block fronting Sandford Road. It is also important to consider the relationship with the adjacent Grade II listed former St Mark's School to the east; a maximum height of 3 storeys is considered to be appropriate adjacent to this heritage asset. The tallest element should be located to the north of the site and clearly delineated from other elements of the building(s) creating a visual marker from the High Street.
- 9.30 Opportunities to improve the public realm with urban greening should be maximised. There may be potential to create a permeable green link through the site to improve pedestrian connectivity between Masons Hill and Sandford Road; however, careful consideration would need to be given to the treatment of public and private space thresholds.

