

Liberal Democrat Bromley Town Councillors' Response to the Proposal for the development of the Waitrose site (Application No:23-02633)

As the elected representatives for Bromley Town Centre, in which the site is located, we wish to **object** to the proposed redevelopment. Whilst there is a lot to commend in the application, there are a number of very significant issues which, we feel, make the proposed development unsuitable for approval in its current form.

In summary our objections are based on the following:

- Height and massing/overdevelopment and environmental impact (including daylight, sunlight and overshadowing.)
- Lack of affordable housing
- Traffic & Transport Implications
- Safeguarding the operation of Bromley Police Station
- Car-free Development and Reduction to Waitrose Car Parking Provision
- Impact on public transportation
- Housing for Bromley

Further detail on each point above is given below.

We urge the Development Control Committee **not to recommend this application for approval** whilst the above points remain unaddressed.

Documentation Reviewed: Our decision to object was made after a careful review of the documentation submitted by the developer, JLP, to the Bromley planning office in support of their application to redevelop the site and which is publicly available to view on the planning portal at Bromley.gov.uk. Furthermore, reference was made to the relevant planning frameworks such as the National Planning Policy Framework (2021 & 2023), Bromley Local Plan (2019), The London Plan (2021), Bromley Town Centre Supplementary Planning Document (adopted October 23) as well as comments submitted on the planning portal, both in support and objection to the proposed development.

Consultation: As councillors we met with the developers twice during the pre-application period and were also present at the public consultations which the developer undertook on Friday 24th and Saturday 25th June 2022, Thursday 19th January and Saturday 21st January 2023, Wednesday 14th June and Saturday 17th June 2023. We conducted our own surveys to independently ascertain the views of those who attended these meetings as well as providing a survey link through our regular email newsletter. We regularly speak to constituents throughout the Bromley Town ward, but also more specifically in the areas immediately adjacent to the proposed site and feel that we have a clear understanding of the particular challenges the proposed development will create in this area of Bromley.

Detailed reasons for objecting:

Height and massing/overdevelopment

The Bromley South sub-area, in which the proposed development is located, is included within the Local Plan site allocation 10 as a site for residential units, offices, retail and transport interchange. Whilst establishing, 'The opportunity for taller buildings' on the Waitrose site (Section 9.22 BTC SPD (2023) the same planning document also clearly states the expectation that:

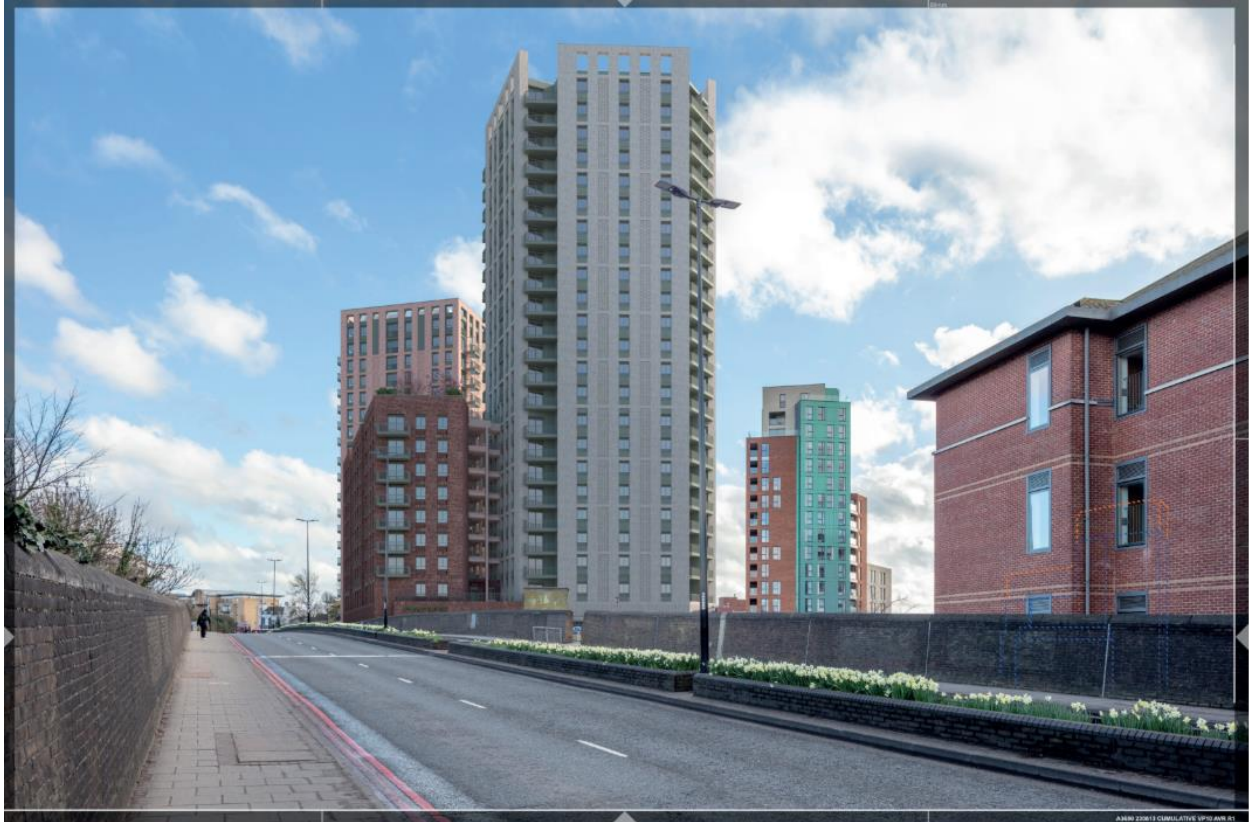
'Any proposals will be expected to incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location'. (Section 9.2)

Additionally Section 9.9 states:

'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.'

In our view this development proposal **does not adequately take account of its setting** and instead represents a massive overdevelopment of a site which measures just **1.68 hectares** (including the site currently occupied by a Waitrose store, customer car park, servicing yard and section of adjoining woodland to the east parallel to Langdon Road).

Despite efforts by the developer's architectural team to present a scheme with high-rise blocks of different levels and a stepped treatment of the buildings directly adjoining the Masons Hill/Kentish Way junction the resultant proposal represents, in our opinion, an intense cluster of buildings with a height and mass which is out of keeping with the predominantly suburban nature of the surrounding two storey residential neighbourhoods, east and south of the site. Even viewed within the more 'urban' context of Bromley South the highest block, at 24 storeys, will dwarf the neighbouring Perigon Heights (at 17 storeys) and even exceed the 19 storey tower of St Mark's Square. If allowed, it will set an alarming precedent which will allow developers to push for the approval of higher and higher buildings throughout Bromley town centre.



Environmental impact (including daylight, sunlight and overshadowing.)

The environmental statement (Volume 1: Chapter 8 – Daylight, Sunlight, Overshadowing and Solar Glare) reveals that some properties on the adjacent Palace Estate, particularly within Prospect Place and Langdon Road will be impacted by the shadowing created by the proposed development at certain times of the day. However, it is the residents of neighbouring Perigon Heights who are the most likely to be impacted by a ‘moderate to major adverse effect’ in terms of changes in both daylight and sunlight. It is worth remembering that these changes to daylight, sunlight, overshadowing and solar glare are **permanent and long term** and there is little that a neighbouring resident can do personally to mitigate the effects of a development of this mass or scale.

Lack of affordable housing

Whilst a rental only development (commonly referred to as Build to Rent) managed by a sole landlord, John Lewis Partnership, will be a good addition to the range of housing available in Bromley Town centre, the **small number of units to be let at an affordable rent** (only 8%) is extremely disappointing and will not meet the planning obligations set out in either the London Plan or the Bromley Local Plan (2019).

We concur with the statement from the GLA, in their first consultation response to the proposed development, stating that '*Considering the scale of development proposed on site, the level of housing is significantly **below** expectation*'.

Traffic & Transport Implications

We are very concerned about the impact the proposed development will have on traffic in the locality, both during and after construction. Station Approach and the High Street/Masons Hill junction is an area with frequent congestion issues due, in part, to the drop off zone outside Bromley South Station and under-regulated parking procedures outside Bromley Police Station.

Safeguarding the operation of Bromley Police Station

The Metropolitan Police Service (MPS) have objected to the planning application, in letters from their agent Knight Frank and Atkins, appointed technical agent, on 20 September 2023 and most recently on 3rd July 2024, .

According to these documents, MPS '*objects to the development and consider that the proposals would be likely to have a serious impact on highway safety and its ability to deliver effective operational policing from Bromley Police Station. MPS believes that planning permission should be refused.*'

It is clear that Atkins, '*are of the view that the proposed Waitrose development is likely to result in **substantial queues on Station Approach and potentially the High Street, due to a shortage of customer car parking during both construction and operation.** This will fundamentally impact the ability of operational police vehicles to safely access Bromley Police Station without substantial delays.*'

We too are of the opinion that the development has the potential to considerably exacerbate an **already fraught traffic predicament in the roads surrounding the proposed development.** Clearly the optimal operation of Bromley Police Station is also of vital importance, not only to the safety and security of residents in Bromley Town centre but also to those within the wider Borough.

Car-free Development and Reduction to Waitrose Car Parking Provision

In the event of a residential development of any type being permitted upon the site, we recognise, as stated in the London Plan (Policy T6, 2021) that it would be eligible for car-free status (aside from the mandatory provision of disabled parking spaces) due to its excellent location for public transport links (PTAL 5-6). As such it will make a positive contribution to encouraging active travel in the borough. As with other such 'car-free' developments within Bromley we expect to see a clear provision that future residents will not be eligible to apply, at any point, for parking permits which would allow them to park their vehicles in residential streets neighbouring the proposed development.

However, even with such statutory parking restrictions it is important to recognise that the number of vehicles required to service a development of over 350 apartments is likely to be considerable, especially during the first stage when maintenance and teething issues arise. We welcome the retention of the Waitrose service yard (as set out in 5.35 'Servicing and Deliveries' – Travel Plan – Part 1. 07 July 23) and provision of dedicated parking spaces for refuse and servicing vehicles as well as an acknowledgement that 'the shared use of the service yard will require coordination between Waitrose and the BTR operator to ensure this can be achieved efficiently and safely' (5.36 'Servicing and Deliveries, as before). We consider this the bare minimum required to reduce congestion both within the Waitrose car park, Station Approach and neighbouring access roads.

Once completed there will be a reduction in the size of the car park which serves the Waitrose store, from 199 spaces currently to 140. It is JLP's contention that '*vehicular traffic generated by the Waitrose store will reduce due to the restraint imposed by the smaller car park*'. However, it remains to be seen if this decreases traffic to the degree which JLP expects especially as the store will retain the same floor space as present, there will be the attraction of a redesigned café and public plaza and many shoppers will persist in making vehicular trips, especially when purchasing heavy or bulky items from the Waitrose store, and/or using click and collect services from John Lewis. We are of the opinion that there is considerable potential for increased congestion and parking problems in this part of Bromley Town centre despite the GLA stating the opposite within their initial response to the application.

Impact on public transportation

Bromley South station is one of the busiest stations on the SouthEastern network – it was identified as the fourth busiest station in South East London in 2020-21 (report by Office of Rail and Road Network Rail). Indeed, staff have recently had to remove seating from the platforms to cope with congestion during peak times. The developer estimates that 19% of public transport trips generated by the proposed development are likely to use the local bus network and 81% will use the train. With the proposed development potentially accommodating over 650 new residents, it is therefore difficult to see how this will result in a "negligible" impact to transport services, as suggested by JLP, especially during peak times.

In Network Rail's consultation response, they say that Bromley South station is "heavily used ... the station was identified as a high priority station for capacity issues (pre Covid-19), following a passenger count survey being conducted in September 2019, with infrastructure investment likely being required to relieve congestion. Since this period, passenger use has more than doubled, further exacerbating the issues. "

The consultation response also comments: "the station has narrow platforms, which make it extremely difficult for passengers to safely wait to board stopping trains or to allow sufficient space for passengers alighting from the train. Access to the lifts at the station is also constrained, with a one-way system required around the edge of stairs. Accessing the lifts can be difficult during peak periods if there are queues blocking back from the stairs. Given the

significant issues associated with the station, it is one of the highest priority stations for interventions to free up capacity to accommodate increasing numbers of users. “

Housing for Bromley

As Councillors, we recognise that there is an urgent need for increased housing provision throughout the borough and agree that this sub-area of Bromley South is a suitable site for development, especially given its excellent location next to a major railway station and within the commercial heart of Bromley Town. **However, this is not an argument for “any development”;** rather we want to see housing which genuinely meets the needs of local people, including the needs of the many people who are struggling to find a suitable home in the borough and respects the rights of people who live nearby. While this development will attract new residents to the borough, who may bring many benefits to the town, the low number of affordable units means the development would fail to resolve the most urgent needs of Bromley residents.

Positive elements of the scheme

Whilst we are **objecting** to the proposal there are positive aspects to the scheme that, whilst they do not outweigh the negative aspects stated above, we would like to highlight:-

- We welcome the continued support of JLP and the investment it wishes to make in Bromley.
- We support the concept of the development being owned and managed by JLP under the ‘Build to Rent’ model as a single on-site landlord. The expectation is that this would ensure that the development is well managed for future occupants. We consider the implementation of tenancy agreements of up to three years with fixed in-term rent increases as a positive step - it is hoped that this will foster a sense of security for residents and community within the development. Furthermore, we are assured that under this BTR model JLP will remain as the sole landlord for a minimum period of fifteen years.
- We consider the proposed improvements to the site will deliver improvements to the public realm and improve connectivity from both the southern approach (Kentish Way) and eastern approach (via the underpass Langdon Road) through to Bromley South Station and the High Street. We would like to see a planning stipulation safeguarding such access at all times of the day, however, and not just when the store is open. We hope that this along with the proposed changes to the façade of the store will help to physically connect the new development to the wider community.
- In terms of sustainability, we are encouraged to see that the proposed development will create energy efficient and low energy homes. Furthermore, we welcome the decision to refurbish the existing Waitrose store rather than having it demolished and rebuilt. Proposed changes to the public realm and the incorporation of roof gardens, high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage within the

development are welcomed. We would like to see the opportunity for net biodiversity gain maximised in a part of Bromley which is sadly lacking green landscaping. Provision of secure cycle storage, enhanced walkways and good accessibility to public transport, amenities and services should make this a prime example of a development with active travel as a core principle.

- We commend JLP for their plans to adopt an ongoing engagement programme to encourage integration of the new development into the wider community and increase the provision of cultural events in the Bromley South area.

Graeme Casey, Julie Ireland and Sam Webber

Liberal Democrat Councillors for Bromley Town

Response submitted on 11 July 2024