

Bromley Liberal Democrats

7 Station Road, Orpington
BR6 0RZ
Tel: 0203 371 1415

www.bromleylibdems.org.uk
info@bromleylibdems.org.uk



30th June 2023

Head of Planning Policy and Strategy,
Bromley Council,
Civic Centre,
Stockwell Close,
Bromley BR1 3UH

By email: ldf@bromley.gov.uk

Dear Sir,

Consultation on Bromley Local Plan

We are submitting the following comments in response to the Issues and Options document currently being consulted on as part of the review of the Bromley Local Plan.

Q1: What do you think are the key issues that should be reflected in the new Local Plan Vision and Objectives?

We think Bromley is a fantastic place to live and we want a local plan to protect what we love most while responding and adapting to the significant challenges ahead.

The challenges include responding to the **climate emergency**, the need to deliver **new homes**, to ensure our **shopping and commercial centres** thrive, to help **businesses grow**, protect our **natural environment and green spaces**, and to create **safe, healthy and inclusive communities** where health and wellbeing is at the centre of future plans.

While considering our response to this consultation, we have been conscious of the need to stand up for the best interests of local people, to support and enable positive regeneration plans which will enhance our communities. We have a responsibility to current and future generations to safeguard what is good about Bromley and support developments that will enhance and improve our borough.

Q2: What do you consider to be the major challenges the Borough should address over the next 15 years?

In broad terms these are:

Providing homes - there is a desperate housing shortage and providing homes needs to be a priority. However these homes need to be in the right place, of the right type and the right price to provide a range of accommodation for Bromley residents throughout their lives, particularly including social and affordable housing.

Responding to the **Climate Emergency** - we need to address the urgent need to minimise our environmental impact, as well as planning for the adverse impacts of climate change.

Help our commercial centres and businesses to thrive - post Covid the business community has faced major challenges, the plan needs to encourage a range of adaptable workspace where entrepreneurs and start-ups can thrive while being an attractive location for well established businesses.

Create **safe, healthy and inclusive communities** where health and wellbeing is at the centre of future plans. This includes reducing the need to travel and improving the choices for more sustainable travel. Healthy streets that encourage active travel should be a key priority. With an ageing population there is a need to ensure sections of the population do not feel excluded and isolated. Accessibility must be prioritised, from seats at bus stops, to wheelchair accessible shops, to pavements that are wide enough for mobility vehicles, to tactile paving to help visually impaired residents. We want our communities to be truly inclusive.

Priority must be given to reducing traffic congestion, air pollution, noise pollution and light pollution.

Protecting what is special about Bromley, including our heritage and culture, ensuring new developments enhance the character of our borough and our historic buildings, parks and conservation areas are protected and cherished.

Protect and create green spaces, increase the quality and accessibility, tackle biodiversity loss and encourage the creation of new green spaces and promote more greenery in every public realm.

Q3: Where do you think new development should be focused?

Brownfield sites, especially those with good transport links and accessibility, should be prioritised but this should include not only larger site developments but the creative repurposing and adaptation of a variety of sites and buildings to provide housing throughout the borough.

Consideration also given to developing on street car parks, with parking moved below ground.

There must be a presumption of protection of greenbelt and metropolitan open land, however there are some sites in the borough that could be developed to deliver appropriately sized social or affordable housing with a high net biodiversity gain.

Q4: What are the major constraints to development in Bromley that we should consider as part of developing a new Spatial Strategy?

The need to observe and preserve the uniquely 'suburban' nature of the borough whilst facilitating development which can meet housing and employment needs.

Transportation, connectivity and ensuring the best possible air quality levels are achieved across all parts of the borough.

The protection of valuable green belt land and sites of specific interest, including town centre park spaces, heritage assets and community resources.

The need for a good housing mix which also includes single dwelling family homes.

The protection of not only local heritage, but also the need to protect the special character of some areas.

Q5: Is there any specific issue that you think we should take into account when preparing evidence to support the new Local Plan policies?

Affordable and social housing should be a priority ensuring that a mix of housing is available to support people at different life stages and different income levels, including single dwelling family houses.

We support a design-led approach to development. Coherent design strategies are essential to deliver an attractive borough rather than allowing developers to produce idiosyncratic designs that deliver a confused mixture of building styles.

Where sites are identified for significant future development there should be a requirement for robust 'infrastructure' assessments to quantify the corresponding demand they will place upon local services, including healthcare, education, transport and social services. This should serve as a precursor to adapting local provision strategies which can confidently meet such requirements and ensure that demand from both existing and new residents for such services is met.

The development of High Streets, Town Centres and Shopping Parades should have a stronger emphasis on accessibility and step free access. For example, all new shopfronts must be required to have step-free access where possible. Where it is not possible a planning condition should include alternative access arrangements. Accessible toilet facilities should be subject to planning enforcement if they are poorly designed and not suitable for the intended users.

Let us know your thoughts on Housing policy

Q6: Where should new housebuilding be focused in the borough, in order to meet housing need?

Significant development should be primarily focused on locations which utilise previously developed or brownfield sites, particularly those which are well-located to encourage sustainable travel and access to facilities, which enhance the work/life experience of residents whilst protecting key environmental resources within the borough. Such developments should be considered within a local context and pay regard to the height and nature of surrounding neighbourhoods.

Q7: Is there a particular form of housing development that you feel is appropriate to facilitate the delivery of additional housing in the Borough, e.g. through development of taller buildings; delivery from smaller sites (less than 0.25 hectares); or infill development?

Whilst we understand that some developments with taller elements are part of a changing housing narrative seen across all London boroughs, we feel there is plenty of scope within the borough to allow for the creative use of smaller sites and infill developments which optimise the use of underutilised land or buildings, particularly where this can be undertaken without impacting upon green spaces, so vital to meeting climate change targets, or altering the predominantly low-rise, suburban character of the borough.

Q8: Do you think the Council should set out site-specific design parameters and seek to put in place detailed guidance and utilise tools such as design codes to guide housing development in the Borough?

Such measures are essential to deliver sustainable, well-designed and beautiful developments where residents of the Borough are proud and happy to reside, feel part of a community and thrive. Furthermore, it is only through careful and thoughtful design targets that we build places which will stand the test of time and be able to adapt to the challenge of climate change.

Q9: How important is the delivery of affordable housing, and what (if any) specific affordable housing tenures should be prioritised, e.g. social rent, low cost home ownership?

Social and affordable housing is vital to guarantee that the low-waged members of our communities are not increasingly forced to move out of the Borough to meet their housing needs. It is essential to retaining key workers, demographically mixed households and those who contribute so much to our communities. We would like to see a significant increase in the amount and range of social rent properties provided, especially for those who are disabled, vulnerable and older.

We would like to see all new housing developments provide at least 50 per cent of the total number of habitable rooms as affordable housing on site.

Q10: Do you think the Council should investigate the potential for seeking affordable housing on small sites (fewer than 10 units)?

We feel this would be a sensible option because such sites are understandably delivered with a greater frequency and more rapidly than large scale developments. Additionally, it would assist in widening the geographical spread of such units across all areas of the borough. Further, smaller scale housing could be built with the sole intention reading the borough's social housing list, with sites specifically designed to deal with specific needs. Smaller scale developments can support the concept of living locally, often being closer to smaller High Streets and public transport.

Q11: What size of new homes do you think should be prioritised?

The priority has to be to build homes that communities need. The prioritisation of particular housing types should therefore be driven by well researched and timely data which assesses where need is most acute but also takes account of long-term demographic trends.

Q12: What (if any) types of housing, other than conventional self-contained dwellings, do you think the Council should prioritise as part of the new Local Plan?

New housing typologies should be considered, especially where they meet demand from specific types of residents, such as young professional or single-adult households who are unwilling or unable to commit to purchasing or renting self-contained dwellings. We would suggest that careful monitoring and assessment of such schemes would be required to examine their long-term suitability as opposed to more traditional methods of housing delivery.

Q13: Is there anything else that you feel we need to address through the new Local Plan housing policies?

The local plan and the accompanying SPD and UDSPD, should help to facilitate new development which meets the identified housing and employment needs, whilst protecting the unique character of areas within the Borough. It is worthwhile, noting, that the Borough of Bromley has a long history of attracting residents due to its uniquely green and suburban character. Whilst change is inevitable, especially given demand for housing, we feel there is an opportunity to keep and further enhance Bromley's green credentials by encouraging the integration of carefully considered green infrastructure and spaces into new developments, both residential and commercial.

Q17: What can we do to attract businesses to locate in Bromley and help existing businesses to grow, e.g. is there a need for affordable workspace, or are there particular types of employment space that are required?

We feel that the proximity of Bromley borough to London and regional transport hubs (road, rail and air) as well as its attractiveness as a place of work and live should make it a very viable location for companies to locate and thrive. We appreciate that some of the current office space in the borough's town centres will need to be enhanced and updated in order to adequately service the needs of modern working practices and future environmental legislation but would, nevertheless, like to see Local Plan policy favour a 'retrofit first' approach. In the event of demolition and replacement, proposed developments should achieve the highest possible sustainability standards incorporating measures such as green infrastructure which can help in air quality, cooling and flood mitigation.

There should be active promotion of flexible and affordable workspaces to allow us to respond to changing business needs as well as create robust and future-proofed places of local employment.

Employers will need to know that they can attract future employees to the borough, focus on promoting the nighttime economy, supporting the cultural life of the borough and making our town centres places people want to visit will support this. Significant improvements to the public transport infrastructure will be key.

We support planning guidance which promotes the provision, whether new or repurposed, of flexible workspace which is physically, environmentally and digitally fit for the challenges of modern working patterns and climate change. Planning policy should encourage flexible, dynamic spaces which can allow all businesses, from start-ups to more established businesses to survive and thrive.

Q18: How can new development enhance employment and training opportunities?

It can foster and promote local venues and amenities that facilitate collaboration among businesses of all scales, community groups and local educational institutions, in order to nurture co-operation which can optimise the creation of employment opportunities and the availability of corresponding training provision. Good quality conference facilities, temporary office spaces, high speed broadband can also contribute.

Q19: What are your thoughts on existing town centres in Bromley? What aspects of these centres do you value most, and what could be improved in these centres?

The existing town centres of the borough are a vital focus point which allow for economic and community interchange. They breathe life into residents' local experience and provide vital opportunities for interaction and engagement. The borough of Bromley is not unique in facing a huge challenge in ensuring that town centres

remain relevant and attractive to residents and visitors but they have the additional challenge of being close to not only London but also some major, out-of-town retail destinations. Better accessibility and connectivity are key to encourage footfall within and between centres in the borough. Good design, a healthy nighttime economy, a feeling of safety and increased use of greening initiatives can help to make town centres more appealing places to linger, helping to encourage high quality retail, cultural and hospitality provision and leading to a sense of wellbeing through improved air quality, a feeling of community spirit and sustainable travel options.

In Bromley Town Centre the local plan should seek to ensure the future viability of Bromley High Street, the Glades Shopping Centre, the historic Bromley Charter Market, Pavilion Leisure Centre and the Churchill Theatre and Library. These assets need to be protected to ensure that the town centre remains an attractive and lively hub for working and recreation.

There is currently a sense of decline particularly in Orpington and also in Bromley Town Centre - empty shops, reduced footfall, rising crime, dirty and badly maintained streets. The local plan needs to address this.

Beckenham Town Centre

We value Beckenham's heritage feel, rich history, range of entertainment, shops and eateries. The Tramlink to East Croydon and Wimbledon is popular and helps to connect people to the rest of South London and beyond. There are plans to improve Beckenham Green in the plans, but the area is under utilised and lacks public toilets. Some areas of the Town are difficult to navigate because of traffic congestion, and pavements that have a few too many restaurant or coffee shop chairs, or A-boards blocking some pedestrians, buggies and wheelchair users. At times the area around Beckenham Junction Station and parts of the High Street can look tired, littered, or unsafe (for example through loose wiring/signage outside retail units), and also at risk of localised flooding, due to the far too narrow pavement drains that were added in the Beckenham High Street redesign.

Beckenham Town Centre is a Conservation Area however this has not had much of a meaningful impact in enhancing the Town Centre, more work needs to be done to strengthen planning policies in this regard. In addition planning policies need to be strengthened and enforced to greatly improve step free access. The town centre car park behind the cinema is of a poor standard as are the cleanliness and maintenance of a number of alleyways of the High Street.

Q20: What are your views on diversifying town centres to broaden their role, e.g. introducing uses such as residential and expanding cultural and night-time economy uses?

Rapid changes to societal and consumer behaviour, including those brought about by the internet and the COVID pandemic, mean that there is undoubtedly a need to review whether town centres remain relevant and attractive to a broad range of users. Enhanced cultural and night-time economy uses are one way to encourage visits but offerings should be sensitive to the diverse backgrounds and economic resources of residents.

The local plan should address the need to encourage and enable new forms of cultural activity, leisure facilities and social connections, including e.g. performance spaces, pop up art, and more. Social connections can be helped by low cost community centres and facilities and loneliness initiatives e.g. friendly benches, meet-up initiatives by local cafes, etc. Town centres elsewhere that have successfully been reinvigorated often include a cultural quarter, showcasing the area's historic and cultural background - for example, why doesn't Bromley have a museum? Or an art gallery? Reinforcing cultural and leisure connections in our High Streets enhances their viability by encouraging footfall and boosting destination-based retail.

Let us know your thoughts on Design and Conservation policy

Q22: Are there any particular design influences, architectural styles or building typologies that you consider to be important in making a positive contribution to the character of specific parts of the borough?

Bromley is predominantly a low-rise borough and while tower blocks are inevitable, we would to maintain the dominance of this style of housing.

Q23: Do you feel that the existing protections for Bromley's historic environment are appropriate? Should there be a stronger emphasis on protection of the historic environment, or should there be a more balanced consideration to allow for new development in certain locations?

The protection for Bromley's historic environment is not sufficient, evidenced by the Council's sale of key buildings and parks. The asset stripping of Bromley's public estate by the current administration has been nothing short of public vandalism. If nothing else, it shows clearly that our historic environment needs much stronger protection.

The historic environment of Bromley should be afforded the highest possible protection in order that key heritage assets are safeguarded and preserved for future generations. Many of the historic buildings and parks have been gifted to Bromley residents by beneficiaries from long ago, it is questionable what right the current administration has to sell off, destroy or fail to maintain these assets thereby depriving them from future generations. These assets not only offer a profound sense of place and distinctiveness but also serve as tangible representations of the significant benefits to a community of exemplary design and planning in sustaining the essence of a place.

The protection of 'heritage assets' should extend beyond individual buildings, protected views and open spaces and acknowledge that they form a collective unifying impression of the borough's historical importance. The preservation of publicly owned land, local parks and heritage assets should be made a priority in the Local Plan and in no part developed or disposed of without extensive public consultation and clear justification.

The Local Plan should reference the guidance provided by Historic England on the many heritage assets and historic environments throughout the borough.

There needs to be clearer guidance for residents that wish to protect heritage assets are green spaces - how do they apply for special designations such as Areas of Special Residential Character (ASRC). The use of ASRCs should be promoted to protect small areas of unique development and to ensure that new development in those areas is in keeping and does not detract.

Q24: Do you think the council should identify suitable locations for tall buildings? Are there any areas where you think tall buildings would be suitable or unsuitable?

Developers are commercial entities; they exist to make money and of course they want to achieve the best financial return from the sites they invest in. Inevitably this will mean some taller buildings, but we want the height of these buildings to be proportionate within the areas they are built. This sentiment is widely reflected, especially within Bromley Town Centre (BTC), Orpington Town Centre and Penge Town Centre. In Orpington there was widespread opposition to the proposals for several giant tower blocks proposed by Areli. In BTC there has been a lot of resistance to the recent influx of tall buildings, most notably St Mark's Square and Perigon Heights. In Penge there has been widespread opposition to the 18 storey blocks proposed for the Blenheim centre redevelopment.

Clearly transport links and facilities make both centres attractive locations for developers but using the 'character areas' identified within the Supplementary Planning Document (SPD), we would like to see tall buildings and their height limited as follows:

Bromley Town Centre

Bromley North – we broadly agree that heights of 4-8 storeys (the higher ones being near the town centre) but there should not be any buildings that reach the height of North Point, which is itself out of keeping with the local area. Bromley North village is quite different – the SPD recognises the limited opportunities for development here and the need to recognise and preserve the historic nature of this part of the town

Bromley East – this area includes The Glades and Elmfield Road. Whilst taller buildings are not out of context it is important that they do not overwhelm the nearby Palace Estate. We ask for a maximum height of 8 storeys along Elmfield Road, and nearer to the Glades that no buildings should be higher than the structure of the shopping centre and nearby office blocks.

Bromley West – there should be no developments higher than the Churchill Theatre.

Bromley South – there are already significant tall buildings in Bromley South, including St Mark's Square and Perigon Heights. Additionally, there are plans already submitted for 1 Westmoreland Road and being prepared for the Waitrose site which indicate that developers wish to go taller and taller. We ask for the height of these buildings to be consistent with the surrounding area, and that they do not overlook nearby houses

Orpington Town Centre

We do not see any demand for high rise development in Orpington from the local community. In the town centre we would like to see a height limit of 8 storeys - but there is little appetite locally for buildings higher than 4-5 storeys.

Beckenham

Reflecting resident's feedback on proposed developments over the past 12 months, we feel that developments should be in keeping with the local environment and neighbouring properties where possible. This includes use of similar brick, design and heritage details and in keeping buildings under seven storeys. There is a new 11-storey building in development at Lower Sydenham and this will be the third new residential development in that local area since 2017. This has changed the look and feel of the Lower Sydenham area, and we will have to reflect on the new 11-storey building once complete as it was agreed before the recent Council term. In Beckenham Town Centre building height should be restricted to match existing building heights.

Q25: Do you think that the Local Plan should include specific design codes which set out parameters for development in the borough? If so, are there any particular areas where you feel design codes would be suitable?

Local design codes, which reflect local character and design preferences, are vital in placemaking. Such guidance can encourage a consistency in design and help to prevent 'clashing' schemes and poor quality developments which are not visually harmonious.

Accessibility design codes should be strengthened in all aspects of planning from step-free access to safe road crossings.

Q26: Are there any policy areas – e.g. residential use, commercial use, public realm – that you feel could benefit from specific design guidance?

We would like to see specific policy guidance regarding the requirement for appropriate servicing area/drop off zones for new developments, especially when the London Plan facilitates them being 'car-free'. Such buildings, however, still require attendance by service and delivery vehicles, carers and other essential visitors and therefore Local plan policy should stipulate that developers must make adequate provision on-site for such visits, in order to avoid negatively impacting neighbouring highways and residents. The policy should also stipulate that permanent abstention of parking permits for occupants of new, car-free developments and this policy should be strictly enforced. We feel specific guidance also needs to be given regarding the siting and accessibility of mandatory on-site disabled parking within developments.

Party walls must be maintained. Frequently on commercial properties there are small widths of party walls between shopfronts that are not maintained - this is unsightly and sometimes dangerous with old fittings protruding.

Let us know your thoughts on Sustainability and Waste policy

Q28: How important do you think it is that the new Local Plan policies support the achievement of Net Zero and measures to tackle climate change?

This should be a priority within the Local Plan. The plan needs to address the challenges of climate change, our responsibility for reducing flood risk, cutting emissions and improving air quality, and following the principles of a circular economy. New developments should meet high standards for sustainable design, increased urban greening and tackle the biodiversity loss by protecting species and habitats, and enable them to adapt to a changing climate. The Local Plan needs to improve resilience against climate change, reinforce the Council's commitment to become carbon neutral, and support residents in reducing their climate impact.

Q29: Do you have any thoughts on local policy approaches that should be put in place to deliver sustainability benefits, e.g. specific sustainability standards and design requirements for new buildings; or a locally specific approach to carbon offsetting?

All developments should be required to “be lean, be clean, be green and be seen” - use less energy, exploit local energy resources, maximise opportunities for renewable energy, and monitor, verify and report on energy performance.

The local plan should encourage developers to make the fullest contribution to supplying energy efficiently through the deployment of appropriately selected, sized and sited technologies, to promote a more ambitious use of available roof space to deliver e.g. renewable energy and green infrastructure, and to adopt a circular economy approach to building design and construction to reduce waste and keep materials and products in use for as long as possible.

Offsetting should only be considered acceptable in instances where it has been clearly demonstrated with robust and credible evidence that no further savings can be achieved. It's vital that carbon offsetting is not seen as an easy option.

Q30: Do you think that the Local Plan should include policies to tackle poor air quality, and if so, what policy measures would you like to see put in place to tackle this issue?

The Local Plan should include policies to tackle poor air quality across the borough but especially in highly populated areas where local residents are subject to consistently poor standards. Policy measures should include, but not be limited to:-

- Encouraging initiatives which enhance sustainable public transport and movement, thereby reducing reliance on private vehicles. This should include the expansion and improvement of infrastructure which supports walking and cycling. Active travel should become the easiest option for people to access local centres, reducing the dominance of vehicles.
- Promoting car-free development, where feasible, and strictly enforcing compliance so as to not impact parking and congestion in neighbouring areas.
- Prioritising road safety in the design of our streets, making the streets feel safer for all road users but particularly pedestrians and cyclists will encourage active travel and make the streets healthier for all.
- Implementing road traffic measures which consider and enhance the ability of vehicle drivers to move around the borough in a way which reduces pollution and congestion.
- Enhancement of green spaces into urban design and development to help absorb pollutants and improve overall air quality. Recognition of existing green parkland and spaces and the role they play in helping combat air pollution as a precursor to ensuring policies provide enhanced protection for all such spaces.
- Establishing robust monitoring systems to regularly assess air quality levels in order to determine whether policy measures are effective and being adequately implemented and enforced.
- Ensuring walking routes to every school in the borough have safe crossing points across busy roads. Noting that primary aged children can walk to school independently in Y6 and some in Y5, walking routes need to be safe enough for children of this age.

Q31: What do you think the Local Plan could do to promote the circular economy?

The local plan should promote the circular economy by incorporating policies and initiatives that encourage sustainable practices and resource efficiency, through good development regulation, waste reduction measures, recycling, prioritising local procurement and encouraging and supporting businesses and community initiatives which design products and services with durability, repairability and recyclability as primary goals.

All development in the borough should prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings. New buildings should be designed for durability and flexibility to limit the need for repair and replacement, they should ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime. The environmental impact of materials used should be minimised by using sustainably-sourced, low impact and re-used or recycled materials, and materials should be locally sourced wherever possible.

Q32: Is there anything else that you feel we need to address through the new Local Plan sustainability and waste policies ?

The current strategy of centralising waste management at one main central Bromley site (Waldo Road) with a secondary smaller site at Churchfields Beckenham has a damaging effect on our environment. This is because

- (a) centralised locations require residents who wish to safely dispose or recycle their waste to visit the centre by car with their waste which means lengthy journeys by car for residents who live furthest away from the site (eg 50 minute round trip for Biggin Hill residents to visit Waldo Road);
- (b) those lengthy journeys increase pollution by car journeys, de-incentivise people to take their waste to the centre for recycling or disposal and provide barriers to residents without access to cars
- (c) the configuration of the Waldo Road waste centre is not suitable for people with mobility or accessibility issues providing a further barrier to recycling and safe disposal of waste.
- (d) the smell, traffic congestion and pollution generated from Waldo Road damages the local environment.

Instead, the local plan should aim to make it easier for all residents from all parts of the borough, with a range of accessibility needs, to recycle and dispose of the waste that cannot be collected as part of the household waste collections. The local plan should therefore:

- (a) seek to set up more waste management centres located across the borough to provide sites that are closer to people's homes to minimise journey time
- (b) set up more micro sites where residents can recycle more of the items that are not accepted as part of the household waste collection

Let us know your thoughts on Green Infrastructure, Open Space and Biodiversity policy

Q33: Do you agree that the Green Belt and Metropolitan Open Land should continue to be strongly protected? If not, why do you think protections should be relaxed, e.g. to facilitate new housing and employment uses, or to meet other development needs?

Green Belt and Metropolitan Open Land should continue to be strongly protected in order to guard against urban sprawl and maintain green spaces which can help the borough achieve its climate change and biodiversity targets. Protection should only be carefully relaxed in instances where development or adaptation of the space could lead to net long-term improvement of the green space or provide community benefits e.g improvement to local parks or conservation areas which allow an increase in carefully managed access and outreach education initiatives about the natural environment.

Q34: Should the new Local Plan include local target for Biodiversity Net Gain? If yes, do you have any thoughts on how such a policy would operate, in terms of the specific percentage of net gain required and/or whether the policy would be tailored based on the type of development ?

Biodiversity Net Gain (BNG) could be set for different parts of the borough. Any developments close to green belt or metropolitan land should have clearly defined minimum targets for measurable Biodiversity Net Gain.

Q35: Should the new Local Plan introduce a locally specific urban greening factor score? If yes, do you think this should apply borough-wide or are there particular areas where it should be targeted?

We agree with the London Plan that the best green infrastructure can play a vital role in helping local communities adapt to the challenges of climate change, as well as increasing much needed biodiversity. Therefore, any tools, including greening factor scores, which identify areas which are currently deficient and encourage the adoption of green infrastructure may be worthwhile, particularly where it leads to sustainable designs which are adaptable to climate change.

We would expect any major development to conduct an Urban Greening Factor assessment in accordance with the methodology set out in the London Plan, to achieve a UGF of a minimum of 0.4 for developments that are predominantly residential and achieve a minimum of 0.3 for developments that are predominantly commercial.

Q36: Are there any specific species and habitat targets or developer requirements that should be included in the new Local Plan?

There should be an acknowledgement that our green spaces are subject to stress due to changing demographic related demands and climate change. Whilst everything should be done to protect valuable natural resources there may be a need to adapt the management of green spaces to meet evolving challenges. For example, greater consideration may be needed to the planting of more drought tolerant, non-indigenous species of plants and trees both in council managed localities and the public realm spaces offered by developers.

The local plan should recognise that by strategically planting and managing its stock of trees, especially in more built-up areas, the council can significantly mitigate the impacts of climate change, such as the urban heat island effect and air pollution whilst also creating a greener, more pleasant urban environment. However, the plan should also recognise the corresponding necessity to implement appropriate management practices to prevent damage to pavements caused by tree roots.

By selecting tree species with non-invasive root systems and implementing proper root management techniques, such as root barriers, watering regimes and regular inspections, the council can strike a balance between reaping the benefits of trees whilst ensuring the urban landscape remains safe for all users.

Furthermore, the local plan should re-establish the importance of safeguarding existing trees from unnecessary removal or damage through active enforcement of guidelines.

Q37: Is there anything else that you feel we need to address through the new Local Plan green infrastructure, open space and biodiversity policies?

Green space and infrastructure play a vital part in conserving biodiversity and improving climate change resilience but there is also increasing recognition of the benefits it can have, both physically and mentally, to those who dwell in urban areas. Whilst past generations of the borough were regularly afforded access to their own garden space the current generations may not be so fortunate. The local plan should therefore prioritise accessibility to all current park space, especially in the town centres and together with the UDSPD also encourage the improvement of connections between existing green space and in the provision of amenities which encourage residents to linger in green spaces, such as public toilets/baby changing facilities, innovative and aesthetically attractive hard and soft landscaping and physical spaces which can encourage local community groups and individuals to engage with nature and partake in sporting activities.

Let us know your thoughts on Social and Strategic Infrastructure policy

Q38: What do you consider to be the key infrastructure challenges and opportunities for the borough over the proposed plan period?

The Borough of Bromley, is facing significant challenges due to population growth but also an increasingly aged demographic. This will place significant demands upon the provision of housing, schools, healthcare facilities, transportation and utilities. Additionally there are considerable spatial constraints, with limited land available for new infrastructure. Maximising the efficient use of existing infrastructure will require innovative planning and design solutions especially where buildings or resources are reaching the end of their lives and require major upgrading or replacement.

Regeneration and redevelopment can, however, provide an opportunity for renewed hope and redefinition of Bromley as a wonderful place to live, work and play. With some imagination it could be possible to repurpose underutilised spaces, promote brownfield redevelopment and actively involve local communities in planning and delivering services that meet their needs and aspirations. Rapid advances in technology will offer opportunities to implement innovative solutions in transportation systems, energy management and digital connectivity but also create a challenge when change is rapid. The local plan should reiterate the need to consider how well-executed policies can help local communities adapt to change, especially technology.

Q41: Is there anything else that you feel we need to address through the new Local Plan social and strategic infrastructure policies ?

The Local Plan should have a strategic policy that will ensure the Council works with service providers and developers to ensure there is adequate provision for community services and facilities.

Loss of community infrastructure should be resisted. We would like to see development proposals include an assessment of the potential impact on existing social and community infrastructure. Such facilities are at the heart of local communities and are important for the quality of life of residents. The pandemic has taught us all just how important social and community infrastructure is to the local community and it's important that these are maintained and protected within existing communities and fostered and nurtured within new communities that form as part of the new housing envisaged.

Let us know your thoughts on Transport and Public Realm policy

Q42: What do you think are the key challenges in relation to promoting sustainable transport in the borough? What could the Local Plan do to facilitate increased levels of sustainable transport use?

We'd like to see true ambition in our transport policy - trams, light rail, new bus services, car clubs, shared car ownerships and more.

We have a vision of a borough where active travel is the preference for many. This can be achieved by implementing the 20 minute neighbourhood concept as part of our planning strategy. This approach will make it easier to be physically active; enhance opportunities for walking and cycling safely. Residents can easily walk or cycle within 20 minutes to access essential services and fulfil their daily needs in towns, local centres and high streets that provide a range of shops, services, employment opportunities, cultural activities and social connections.

This policy would specifically include initiatives such as School Streets, where roads leading to schools are closed to traffic during school start and finish times to ensure children can safely go to school. Families should be able to walk and cycle to school safely with clean air around them

For public transport, while the arterial routes into central London need improvement, we want to see plans that focus on linking up with transport in nearby boroughs e.g. Lewisham, Greenwich, that provide links between key centres e.g. our hospitals, schools, and community centres. We want an undertaking to make orbital travel by public transport easier.

It is time that the current administration abandons its policy of refusing to engage with TfL's expansion plans and open a constructive dialogue about future transport projects in our borough. We can see the difference in Lewisham, who have worked with TfL and have benefitted hugely from the improved transport links.

Bromley Town Centre is often referenced as being an area with "excellent" transport links. It has links but not the capacity. Policy needs to take account of the lack of capacity on the various modes of public transport at peak times – Bromley South is acknowledged to be the busiest station in the Southeastern network, and seating has had to be removed from the London bound platforms to ease pedestrian congestion and improve on-platform safety. Buses to Lewisham, Catford and Orpington are regularly full to the extent of being unable to pick up all the passengers waiting at the stops along the routes. Links from Bromley North are poor and diminishing.

The maintenance of a regular, fast train service to London from Orpington is of vital importance to the town and the outer parts of the borough. The provision of a good bus service from villages to main local centres and stations is also critically important.

Beckenham

The key challenges in promoting sustainable transport in this ward are car use, the urban plan of the High Street area and the lack of interconnected cycle routes. Car use is notably dominant in the area, compounded by the effects of the Council not supporting School Streets with ANPR cameras. The urban plan of the High Street favours motor vehicles as the pedestrian areas are quite narrow in some places like the corner of Beckenham Junction Station and the railway bridge. And, there are issues with the pedestrian phasing of traffic lights, with some being too short for vulnerable and slower walkers to safely cross in time, and in some cases, like at Corner Ways Surgery - Bromley Road-Wickham Road - there is no pedestrian phase at all, and the traffic islands are too narrow for buggies and wheelchair users to use safely. There is also a lack of interconnected cycle routes, and cycling around

the area can feel unsafe until you leave the urban area completely. There have been failed and costly attempts of cycle lanes, which have changed and frustrated both cyclists and motor users.

Improving, extending and evaluating public transport services and capacity must be an essential prerequisite of permitting large developments, especially those that are 'car-free'.

Q43: Should the new Local Plan have a strong emphasis on the provision of high-quality public realm? Are there any particular features that new or improved public realm should include?

We strongly support the concept of public realms within the borough's town centres as being 'people-focused', where pedestrian movement is prioritised and visitors wish to linger. We would like to see this facilitated within the Local Plan (and the SPD/UDSPD) by encouraging wider walkways and pavements, green infrastructure, dedicated disabled parking, pedestrianised zones and seating areas as well as better provision of clean, water fountains, accessible toilet/baby changing facilities. It's vital that provision to keep the public realm clean and well maintained is included - the deterioration visible around several of our town centres shows that areas will fall into disuse if not maintained and be centres for local crime.

Q44: Is there anything else that you feel we need to address through the new Local Plan transport and public realm policies?

The transport and public realm policies need to be fundamentally underpinned by the idea of **connectivity** within town centres and throughout the borough. Good public transport, accessible and well-maintained footpaths and safe, well linked cycle routes and infrastructure are vital in transitioning to 'net-zero'. Policy needs to encourage an improvement in the continuity and safety of pedestrian and cycle routes especially at major junctions and accident black spots.

Developers should be expected to provide off-street vehicular and cycle parking, including electric vehicle charging points. Cycle parking must be fit for purpose, secure and well located, and easy to use by people of all ages.

Whilst public transport improvements should be prioritised we do not currently support any loss in provision of existing town centre car parking spaces without careful assessment of the impact of such a policy on the commercial viability of the town centres. We would like to see the introduction of initiatives such as a park and ride schemes and also a marked increase in affordable electric car charging point provision both within the town centres and on local shopping parades.

Yours sincerely



Julie Ireland
Group Leader, Liberal Democrat Councillors
Bromley Liberal Democrats