



TfL Reference: BMLY/25/21

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29th April 2025

Dear [REDACTED]

Land South of Crockenhill Road– TfL Pre-application Advice

Thank you for participating in Transport for London’s (TfL) pre-application process, the aim of which is to ensure that development is successful in transport terms and in accordance with relevant London Plan policies. This letter concerns the recent meeting regarding the proposed development at the Land South of Crockenhill Road, in the London Borough of Bromley.

The following comments are made by TfL officers on a ‘without prejudice’ basis. You should not interpret them as indicating any subsequent Mayoral decision on any planning application based on the proposed scheme.

Based on the information shared it is understood that the proposals seek to provide circa 350 homes that will include a large portion of family homes and 50% affordable housing. The site is also proposed to include community facilities, greenspace and play areas.

The pre-application meeting was held with TfL on 7th April 2025, and was attended by the following:

[REDACTED]	LIH
[REDACTED]	LIH
[REDACTED]	SLR
[REDACTED]	SLR
[REDACTED]	Nexus Planning
[REDACTED]	GLA

██████████	London Borough of Bromley
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Site Context

The site has a Public Transport Access Level (PTAL) of 1a, on a scale of 1-6b. There are three bus stops to the north of the site, two of which provide access to the 477-route operated by Arriva Kent Thameside, and the other providing access to B14 (formerly R6) towards St Mary Cray. The 477 is a non-TfL specified route, running between Orpington and Dartford/Bluewater with a very low frequency (with gaps between services of an hour or more). The B14 runs every 30 minutes on weekday day times and runs between Orpington and Bexleyheath.

Directly to the south of the site, on Cockmannings Road, there are two bus stops, which serve the R4 bus route. This service runs every 20 minutes on weekday day times, between St Mary Cray and Locksbottom.

The closest train station is St Mary's Cray, which has South Eastern and Thameslink rail services. It is over 2 km away and thus well outside reasonable walking distance (960m) for inclusion in the PTAL calculation. It can, however, be reached by bus routes B14 and R4 or by cycling.

Transport Assessment (TA)

The key transport issue when considering housing on this site is the need to ensure that the development is sustainable, and that the mode share is not car dominated. NPPF paragraph 110 states:

'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'.

London Plan Policy T1 'Strategic approach to transport' requires that development proposals support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle, or public transport by 2041. For outer London, this equates to 75% of all trips.

This will be TfL's primary consideration when advising the GLA and Mayor on a subsequent planning application, so the application material and the TA in particular must focus on demonstrating this policy compliance.

Healthy Streets

In line with London Plan Policy T2, the TA will need to be prepared in accordance with TfL's Healthy Streets TA best practice guidance, which can be found on the following link: <https://content.tfl.gov.uk/healthy-streets-ta-format.pdf>

This assessment should include, but not be limited to, an Active Travel Zone (ATZ) assessment, trip and mode share assessment, trip distribution and servicing.

TfL request that a nighttime ATZ assessment is also carried out as part of the Healthy Streets TA. Further detailed guidance in relation to this development proposal is set out below. The ATZ will be particularly important, given the likely challenges of meeting the Mayor's strategic mode share target.

As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The Healthy Streets approach seeks to improve air quality, reduce congestion, and make attractive places to live and work. There are ten Healthy Streets indicators which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle, and use public transport. Healthy Streets applies equally to the site layout (through good design) and key off-site active travel routes (assessed via the ATZ)

An ATZ assessment should be included with the TA and prepared in line with TfL guidance. The ATZ assessment should focus on key routes in the surrounding walking and cycling network rather than trying to identify all the issues. Guidance on how to conduct a Healthy Streets ATZ assessment can be found using the following link: <https://content.tfl.gov.uk/atz-assessment-instructions.pdf>

The TA Scoping Report suggests the following ATZ routes:

- Route 1: To ALDI
- Route 2: To St Mary Cray Rail Station (From the Northern Access)
- Route 3: To St Mary Cray Rail Station (Southern Access)
- Route 4: To Orpington High Street
- Route 5: To Manor Oak Primary School
- Route 6: To Nugent Retail Park
- Route 7: To Philomenas Primary School
- Route 8: To Harris Academy Orpington
- Route 9: To St Mary Cray Primary School

The scope of the ATZ should be widened to include leisure facilities and a place of worship. Suggested improvements to the scoping include:

- Orpington Rovers Football Club
- Orpington Sea Cadets
- St Andrew's Church
- Temple United Reformed Church

It should be noted that these routes should be assessed for pedestrians and cyclists. Furthermore, to support the Healthy Streets indicator 'people feel safe', a night-time ATZ assessment should be undertaken for routes that do not have street-level activity during hours of darkness, including routes to the nearest station and local bus stops, and other destinations that will be visited during the hours of darkness. Close attention should be given to any routes which go through St Mary Cray Recreation Ground as discussed in more detail later.

It is positive to see that the proposal presented at the meeting includes some measures to enhance walking and cycling, supporting better connectivity throughout the site and into the wider area. To fully assess the street conditions and ensure alignment with the Healthy Street principles, we would welcome further detailed information, such as street sections and movement diagrams. This should include how active travel would be prioritised and how different modes will interact.

Reliance on the St Mary Cray Recreation Ground for active travel connections to Cray Avenue, the high street and beyond raises some concerns. While there is some lighting along the narrow path, and any widening or provision of a parallel cycleway would be welcome, this is still unlikely to feel safe as a suitable 24/7 public route. Alternatives are Crockenhill Road and Cockmannings Road / Chelsfield Road, which do not have dedicated cycle facilities and are likely to experience increases in traffic. These may make them more hostile for walking and cycling, depressing the potential for people to choose active modes and embedding car dependency. It is recommended that further improvements to these roads are explored to support safe and comfortable journeys.

Existing off-site footway conditions, such as surface quality, maintenance requirements and lighting, should also be reported, and where necessary contributions should be secured to fund improvements, in consultation with the Council as highway authority.

Route quality in terms of accessibility for all will also be a key issue, such as footway widths, dropped kerbs/raised crossings in appropriate locations, and bus stop accessibility audits. Hours of opening of any parts of the route not open 24/7 should be included together with an indication as to when activity and surveillance is available or could exist subject to developer funded or delivered improvements. This information should all be included in the ATZ assessment.

From the discussions at the meeting, it is understood that the applicant is seeking to retain and enhance the existing public rights of way (PROWs) within the site, which is welcomed, and they should be improved in line with the Healthy Streets indicators outlined in Policy T2. The PROWs must make it clear that walkers are welcome, for example through clear and consistent signage and no barriers, perceived or otherwise.

Overall, the proposals demonstrate a provision of public realm, which at this initial stage could be capable of being integrable with the surrounding context. The layout

suggests an inclusive approach, offering sufficient space for a range of users across different locations within the site. As the design progresses, we recommend further consideration of the hierarchy of spaces – clarifying their respective functions and characters.

It would be also helpful to understand how these spaces will be managed and maintained by the applicant, and how this aligns with the London Public Charter to ensure high-quality, inclusive, and resilience public environments in the long term.

Public Transport Network Impact and Potential Improvements

A detailed trip generation and impact analysis should be provided at the planning application stage. Based on this assessment, a public transport capacity and/or connectivity contribution may well be required, for example re-routing a bus through the development as mentioned at the meeting, which is set out in further detail below.

Given the low PTAL and potential for high car mode share, in principle, TfL would be supportive of running a bus service through the site to directly serve the development, making these services much more attractive. Such a service would be dependent upon suitable infrastructure being provided within the site as part of the development and/or by the developer off site and s106 funding to cover the initial operating costs.

Our preference being rerouting either the B14 or R4 as a through-route. This, however, would mean a loss of connectivity and frequency of links with the High Street for some existing passengers. Thus, we would need to ensure that the disbenefit is minimal and does not cause adverse impacts on the network, or can be mitigated if so.

Trip generation should be provided in order for TfL to assess if additional capacity would need to be provided on these routes. Ideally split by period / hour and by direction. If it was considered that there was risk of crowding, larger buses could address this, but it is likely that constraints elsewhere on the B14 and R4 would mean vehicle length / type would continue to be limited, otherwise we would need to look at increasing frequencies and this would need to be 'pump prime funded' through s106. The TA should provide a future PTAL assessment with a bus service through the site.

If we did conclude that routeing the B14 or R4 was viable, it would be subject to public consultation and therefore there is a risk that ultimately due to objections from those who would no longer be served or have a worse bus service that the routing through the site cannot be progressed. In this case there would need to be provision for an alternative plan to provide public transport connectivity for the development through a new terminating service. Therefore, there should be consideration for how buses could turn within the site and consideration be given to infrastructure to support this (standing, welfare facilities etc). We can provide further guidance on this. However, to clarify TfL will not be able to run a bus service for the development if it is not a viable operation once the five-year developer s106

payment has ceased. In this circumstance the focus will need to be on improvements to existing services and infrastructure and a recognition that the site will always have a low PTAL.

You should also consider stopping arrangements both within the site and on the approaches, to maximise ease of access for residents. Walking routes to the stops should be as direct as possible, with full accessibility for wheelchair and buggy users, and for those wheeling luggage. However, given that some of the site is outside reasonable walking distance from any bus stop (640m) and for other residents the distance will be close to this maximum rather than the standard of 400m.

Road widths would need to be 3m minimum, ideally 3.2m to accommodate buses.

Any new bus stops would need to be fully accessible (Accessible bus stop design guidance), with shelters and seating to TfL specification. We would also expect s106 contributions to improve existing stops to be used by the development if these fall short of these requirements. Real time information at stops should be provided, given the relatively low frequency of service, including those existing stops which would serve the development.

The on-street gap between bus stops on a route would need to be no more than 400m. A view would need to be taken at some point whether one or two pairs of stops would be appropriate.

Bus priority should be considered, for example bus gate/s within the site, and/or bus lanes on the access junctions.

Again, we can provide more guidance on this as the detailed site layout plans emerge.

Junction Modelling Assessment

Given that the sites identified within the junction Assessment are borough highway, it would primarily be an issue for the Council to consider and discuss with the applicant as the local highway authority. However, as we mentioned at the meeting, we do have an interest, given the potential safety and bus journey time implications. Modelling colleagues within TfL are satisfied that the proposed locations for junction modelling are sufficient for TfL purposes (Bromley may have a different view), with all the nearby strategic bus routes taken into account. Our primary interest is the capacity of our TfL traffic signals, along the A224, with forms part of the Strategic Road Network (SRN).

Car Parking

Policy T6 of the London Plan states that “Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Given the low PTAL outer London location, the London Plan recognises that some car parking would be

expected, but should not exceed the maximum parking standards outlined in Table 10.3 and the proposed provision must be justified.

Disabled persons' parking should be provided in line with Policy T6.1. Policy T6.1 Part C states that 'All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.'. However, we would encourage all active EVCP from the outset, at least for the spaces for disabled persons' parking. The provision of EVCP is also in line with Policy 1.3.16 of the Bromley Local Plan.

The applicant has also proposed that a car-club could be provided on-site. Policy 1.3.16 of the Bromley Local Plan states that 'Any new development should where appropriate include electric vehicle charging points and more car clubs, increasing travel choices for local people'. This policy also seeks the provision of access to a car club for residents and the necessary parking be provided. These matters should be taken into consideration within the application including through design and commitment to supporting residents' use of a car club.

Also, Policy T2 of the London Plan states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving. Thus, further information regarding car parking should be provided in a draft TA with particular consideration given to minimising the car-dominated nature of the development through considerate design. The 'blank canvas' should allow for a 'liveable, sustainable neighbourhood' to be designed in from the outset, which would see non-motorised active transport made the focus. Routes for active and sustainable forms of travel should be as direct if not more direct than the route for private vehicles.

Providing space for uses such as children's play, landscaping, and biodiversity net gain, rather than tarmac for car parking, should also be made a priority. Given to the potential to re-route an existing bus service through the site, as discussed above, or alternative improvement it should be noted that the PTAL will likely be subject to change (to be calculated in the TA, as mentioned above) and thus car parking should be provided to no more than the maximum on the basis of this new PTAL.

Cycle Parking and Access

Long and short stay cycle parking provision should at least meet both the minimum quantity and quality standards outlined in Policy T5 including the London Cycle Design Standards (LCDS).

Further details on this should be provided in the planning application, including the amount of space and layout within the parking areas to demonstrate compliance with both parts of T5 and showing/describing the routes from street to parking for each part of the development.

It should be made clear that the provision of Brompton/folding bikes should be in addition to the provision which makes up the required minimum London Plan standards, as set out in Policy T5.

We recommend that the appropriate mix of stand types is provided in all stores to meet policy requirements. TfL recommend the following mix should be provided as a minimum:

- 5% for larger cycles
- 20% (or 5% for non-residential uses) of Sheffield stands at normal spacing
- With the remainder as two-tier racks.

In terms of quality of cycle parking, to meet LCDS standards, residential cycle parking should be:

- Secure, with access for residents only, and with stands/racks allowing both the frame and at least one wheel to be secured
- Well located: close to the entrance of the property and avoiding obstacles such as stairs, multiple doors, narrow doorways (less than 1.2 metres wide) and tight corners
- Covered
- Fully accessible, for parking all types of cycle
- Managed, where possible, in order for access to be administered and to provide ongoing maintenance
- Given the cycle parking standards are calculated on the basis of average demand and the need to provide for those needing wider spaces provision to the minimum standard which can be accessed only by the occupiers of one unit must be avoided.

Cycle routes within the site should be designed as per LCDS requirements. They should be high quality, safe and direct, and segregated where necessary.

Delivery and Servicing and Construction Logistics

A draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) should be provided with any planning submission and a full DSP/CLP secured through condition at determination stage.

The access routes to and from the site will need to be identified, with the aim of minimising potential conflict with pedestrians and cyclists and bus services.

Peak hour delivery restrictions may be required, and the use of cargo bikes (inter and intra site) should be maximised and encouraged, in line with Policy T7 and the Mayor's Zero Carbon Initiative. Deliveries must be adequately catered for, particularly the uncontrollable personal deliveries, so as not to risk impacting bus services and road safety.

Details of construction should be provided prior to determination, e.g. vehicle routing and loading locations in order for TfL to assess whether the development would have an unacceptable impact on bus operations or more generally highway

safety and operation (to be considered by Bromley as highway authority and by TfL in respect of the impact on the strategic road network. Policy T7 requires inclusive and safe access for people walking or cycling should be prioritised and maintained at all times. This should be demonstrated prior to determination.

TfL encourages the use of construction contractors who are registered on the Fleet Operator Recognition Scheme (FORS). Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital's roads. TfL also encourages the developer to adhere to the CLOCS standard.

Further information on the expected number, dwell times and timings for deliveries should be also provided prior to determination.

Travel plan

A draft Travel Plan should be provided with the planning application, detailing targets and measures to increase active and sustainable travel in line with the Mayor's Strategic Mode Shift target outlined in Policy T1. The travel plan will be particularly important in this case given the outer London low PTAL location which will mean meeting the London Plan mode share targets will be extremely challenging. The travel plan should seek to incentivise the use of active travel and public transport, through tangible measures such as financial incentives/member benefits for non-car users living on or accessing the site, especially the intra-site community use.

More generally the Travel Plan should follow the below principles:

- Targets should be set over a minimum five-year time frame, with interim targets at year one and year three.
- Targets should be ambitious and SMART (specific, measurable, attainable, realistic and timebound). For example, reduce single occupancy vehicle trips by x% by x date). Clarify which journeys are being assessed (all trips/peak trips only)
- Should be linked to the objectives of the travel plan (e.g. if the aim is to promote healthy travel, targets to increase walking and cycling should be set)
- Should improve on baseline mode share of sustainable modes in the transport assessment and enable the measurement of success in achieving the objectives of the Travel Plan.

As discussed at the meeting, we understand you have begun to explore the implementation of measures to encouraging cycling by making it a more appealing option. Measures include: providing cycle repair kits, and cycle training were mentioned. To secure a relatively high cycling mode share the measures must be more ambitious than this. We would encourage further consideration of opportunities to support active travel as well as that by buses and these should be outlined in the full Travel Plan And subsequently secured.

These strategies to encourage active/multi modal travel will complement the design measures and potential improvements to bus services outlined earlier. However, if these elements are not delivered successfully, there is a risk that the development will be contrary to London Plan policy 6.1.

Summary

As discussed in our meeting and set out above there are significant issues which require further discussions and action. TfL welcome further involvement and discussion with the applicant along with the London Borough of Croydon in order to ensure agreement on as many issues as possible.

I hope this provides a useful basis upon which to progress this planning application and look forward to hearing from you shortly.

Should you wish to discuss any part of this letter, please contact myself or [REDACTED] [REDACTED]@TfL.gov.uk).

Yours sincerely

[REDACTED]

Lucinda Turner
Director of Spatial Planning

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.