

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter M89

Retailing – strategic framework

Would policies SD6, SD7, SD8, SD9 and E9B provide an effective strategic framework for the preparation of local plans and neighbourhood plans relating to town centres and all types of main town centre use development (including bulky goods retailing), that is consistent with national policy?

Comment

Bromley has outstanding concerns as to whether these policies provide an effective strategic framework relating to town centres and main town centre use development.

The Council had previously objected to Clause C of Policy SD6 and expressed concerns over its overemphasis on ‘higher density’ schemes in town centres, as well as the admittance of residential-only schemes within town centre boundaries. The removal of references to ‘higher density’ and ‘high density’ development in the modifications is welcomed. However, the retention of the paragraph relating to residential-only schemes in the supporting text could pressure the Council to open up further land for housing in future Local Plan reviews, at the expense of existing commercial uses. This is somewhat compounded by the new emphasis on high streets introduced in the modifications to Policy SD6.

Bromley also objected to the encouragement of residential development into out-of-centre retail and leisure parks under Policy SD7 Town centres: development principles and Development Plan Documents (formerly Policy SD8). Many out of centre retail parks in Outer London are poorly serviced by public transport and their promotion in Local Plans for residential-led intensification could lead to increased car dependency and parking pressures. This issue has not been addressed in the latest modifications and therefore Bromley’s objection stands.