

NUTS TO THE WALNUTS

Nuts to the Walnuts Feedback on the Orpington SPD Consultation Draft, February 2022

This is feedback on the draft Orpington SPD from the Nuts to the Walnuts (NttW) campaign group. NttW was formed in November 2021 in response to proposals submitted by Areli to redevelop the Walnuts Shopping Centre and the Walnuts Leisure Centre (WLC) in Orpington's town centre. The group's purpose is to share information and be a central point of contact for the town's residents. It currently has around 2,400 members.

NttW group communicates with members and residents via its Facebook page, its Twitter account and its YouTube channel. The team also liaises with local residents and the wider public through face-to-face talks on Orpington High Street and outside the Walnuts Leisure Centre (WLC). It also held a public meeting in April this year.



(Source NttW - NttW team on Orpington High Street liaising with the public about the SPD – June 2022)

The group also liaises with elected Councillors, Council Officers and other stakeholders to exchange views and share information.

This feedback is based on the major themes which have emerged during this consultation and from a recent poll conducted via the Facebook page. As the draft SPD was written around the same time as Areli shaped its development proposals for the town, some comments are informed by the Areli planning application because that demonstrates the type of applications this draft SPD enables.

To date around 3,500 objections have been sent through the Council's planning portal to Areli's proposals. This is the largest number of objections to a development which Bromley Council has ever received, and about the fourth largest in the UK.

Whilst Areli held public consultations, these took place during a pandemic, over a period of lockdowns and restrictions. The reach and clarity of those consultations have been questioned, e.g. the Areli consultations did not include a scale model, and therefore the height and size of the proposed development were unclear.

As far as this group is aware this SPD consultation was only publicised by elected Councillors in *In Touch* magazine. We are aware of an e-poster on the bus shelter outside McDonalds in Orpington High Street, a poster in the town's library and a listing in the local newspaper, the *News Shopper*. On the Council's website, the SPD itself is not available in accessible formats

or in any other language. There is no telephone answering service offered for those who may find it more accessible to participate verbally.

We recommend that future public consultations by the Council or by developers be more widely publicised using print media, the internet, visual advertising and delivering or posting leaflets directly to people's homes. There should be face-to-face public consultations in public buildings and more informal consultations on the street. Developers' plans should always include scale models which can be viewed in public buildings. Consultation documents should be available in a variety of accessible formats. Consideration should also be given to providing information in different languages. Ways of feeding back should be straightforward. These should include the provision of a telephone answering service, for people to leave messages, as well as options to post or submit comments online, and opportunities to feedback on the spot at an event.

NttW group has spent a great deal of time publicising and explaining the importance of responding to the SPD to the public. It has offered advice and different formats for replies, e.g. forms and polls, in order to encourage involvement from local people and to make feeding back as accessible as possible. To date there have been over 500 responses, which we understand is the largest number of responses the Council has ever had to such a consultation.

Since the full extent of Areli's proposed development became known to Councillors, even those who initially supported the plans have publicly stated they are not suitable for Orpington.

Gareth Bacon MP has never supported the application and after conducting a public consultation stated:

...My main reason for objecting to the application is the sheer bulk, size and scale of the development proposed. These proposals would erect fifteen new buildings, ranging from four to 19 stories. Eight blocks would be above ten stories tall...
(Gareth Bacon: <https://www.garethbacon.com/post/gareth-bacon-mp-s-objection-to-the-walnut-centre-planning-application>
21 March 2022)

Even the Greater London Authority (GLA) has serious reservations, and has asked Areli to revise its proposals, chiefly in the areas of social housing and the Walnuts Leisure Centre (WLC). (GLA report of 21 March 2022)

The NttW's public meeting in Orpington College Square on 12 April 2022 was attended by around 300 people. Ward Councillors from all political parties spoke as well as many others.



(Source: NttW – NttW Public meeting 12 April 2022)

For these reasons and the points we go on to make, decisions on the future of Orpington town centre must be fully considered, debated and not rushed through.

Recent Government announcements from Michael Gove MP show strong support for residents being closely involved in decisions about developments in their area. This approach also reflects the spirit of the Localism Act 2011.

- [The SPD should state that Council Officers and Ward Councillors have a duty to liaise formally and regularly with residents regarding medium and large developments in the local area.](#)

The Council does not normally use comments from specific planning applications to inform draft SPDs. However, at 52 pages long and written in formal language the SPD is not the most accessible of documents. We urge the Council to remember that Areli's application and the SPD took shape during a pandemic and make an exception in this case. We ask the Council to take into account all the views expressed on the planning portal from the public, along with the objections expressed by our MP and Ward Councillors to Areli's application, when finalising this SPD.

However, feedback on the SPD, even taken together with comments on the proposed Areli development does not override the need for a Council led independent public consultation on the future of the Walnuts Leisure Centre (WLC). Refurbishing the current WLC, not demolishing it, as Areli proposes would be a cheaper and greener option. A discussion on the future of the WLC and the public consultation follows later.

So, how do we see Orpington's future?

Orpington is an important town centre which currently provides work, sport, leisure, retail and education opportunities. It's a busy place which is much valued by local residents and businesses. Although now a London borough, it is in fact a bustling suburban town in Kent.

There is a view that high streets are dying because of the increased use of the internet for shopping, coupled with a belief that transforming high streets into residential areas will somehow stem the perceived decay. However, lockdowns gave us an insight into how living without amenities works in reality. Yes, people shopped on the internet but they longed for services and shops to reopen; leisure centres, restaurants, pubs, hairdressers, fashion stores etc.

The group conducted a lightning poll on Facebook in the last week of June asking 3 questions to gain a snapshot of members' views. The poll went live on 21 June at 09.00 and closed at midday on 23 June (except for Question 1, which closed at midday on 22 June due to a technical error).

As you can see, the majority of our members favoured buildings of between 1 – 4 storeys high, a refurbishment of the current leisure centre, and the construction of between 1 – 250 flats.

1. *How many storeys should the buildings be?*

Options, with percentage of 207 votes cast:

| Options Number of storeys | % of vote |
|--|-----------|
| 0 | 3 |
| 1 - 4 | 67 |
| 5 - 9 | 25 |
| 10 - 14 | 0 |
| 15 - 19 | 0 |
| 19 Plus | 0 |
| One person added 7 storeys, and 1% voted for the question in error | |

2. *This question is a little more complex and relates to the leisure centre and what you would like to see happen in relation to the leisure centre facilities now and in the future.*

Options, with percentage of 290 votes cast:

| Options | % of vote |
|---|-----------|
| Refurbish the current leisure centre | 87 |
| Build a new leisure centre on the ground floor of one of the tower blocks (Current proposal) | 1 |
| Build a leisure centre out of town | 2 |
| Build a new purpose built leisure centre on the grounds of the current leisure centre | 6 |
| One person added, "Keep the leisure centre open and build a new one close to the town centre with adequate parking then close/repurpose the old leisure centre" | |

3. *Here is a question about the number of flats which of course will impact on the density of the proposed development.*

Options, with percentage out of 200 votes cast:

| Options | % of vote |
|------------|-----------|
| None | 20 |
| 1 - 250 | 73 |
| 251 – 500 | 5 |
| 501 - 750 | 1 |
| 751 - 1000 | 1 |

We support sensible, proportionate development plans for Orpington. Considered and sympathetic development on a scale which is in keeping with existing buildings, and which is realistically deliverable within the town's existing infrastructure are welcome. We must safeguard the quality of life here for current and future residents.

We want no more than 6 blocks of flats, around 1 – 4 storeys tall, but not higher than Brunswick House, in the area planned by Areli. We want no more than an extra 250 accommodations to be built in the centre of Orpington. Naturally, all quotas for social, accessible and affordable housing should be met by any developer.

According to CIA Insurance, based on information from the Government's vacant dwelling list, at the end of December 2021 there were 3,489 vacant dwellings in Bromley borough.

https://www.mylondon.news/news/uk-world-news/number-empty-homes-every-london-24272991_amp?fbclid=IwAR2NLvazoyEaW4BV1VxHuqNyefl6ijt9ldyRVnqZsdhUjmsicFjt839gVEM

(Source: MyLondon – 21 June 2021)

We suggest that the Council investigates using these to provide much needed homes ahead of approving mass building in our town centre. *Action on Empty Homes* can provide support with this. It has a toolkit on its website designed to encourage partnerships between local councils and communities to bring empty homes back into use to meet local housing needs. Here's a link to their website:

<https://www.actiononemptyhomes.org/>

We are pleased to see that The Village sub-area's historic origins and distinctiveness is recognised. We are glad that development potential is classified as low, which seems in keeping with the conservation status of most of that area.

Developers are commercial companies which exist to make money and will be in our town for a limited period of time. Our Councillors are elected to represent the best interests of local people and so must firmly refuse proposals of the bulk, size and scale proposed by Areli and other developers.

Councillors and Officers should distinguish between positive regeneration plans which would enhance Orpington, and massive overbearing developments, which would not. The SPD should help Councillors and developers to do this by clearly setting out what is acceptable and what is not.

Members of the Council have the huge responsibility of safeguarding our town and its residents and we ask them to support incremental, dispersed and modest developments and reject the disruptive architectural paradigm shift that developers like Areli propose.

This response is divided into sections:

- Bulk, Size and Scale. Tall Buildings (including accessibility and safety concerns)
- Tall buildings and the Impact on Conservation Areas
- Shadowing, Accessibility and Winds
- National planning policy and guidance
- Access to parks and nature
- Infrastructure
- Design and Density (including a survey carried out by *NttW*)
- Walnuts Leisure Centre (including a promised public consultation and financial matters)
- Orpington College and the Saxon Centre

Bulk, Size and Scale. Tall Buildings.

The graphic below shows the bulk of the proposed development. The green building is Orpington College, which, at 11 storeys high, is the tallest building in the area. Areli's proposal is for around 990 flats across 15 residential blocks, ranging from 4 to 19 storeys high.



(Source: NttW)

Why does the Council consider that Orpington East could host a 12 – 15 storey building, or taller, if it is “*a visual marker providing a positive landmark at the heart of Orpington Town Centre*” (SPD paragraph 6.4, p35)? This would clearly not fit with the overall form and layout of the surroundings and is contrary to the advice given in the National Planning Policy Framework (NPPF):

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).

(SPD 2.4 p6)

Additionally, the SPD states:

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 and the Cray Valley beyond.

(SPD paragraph 5.15 p26)

The area is characterised by a range of two and three storey buildings. In addition, tall buildings will not preserve or enhance the existing qualities of Orpington's town centre. They will block out light, change the skyline and are incompatible within such close proximity to the town's Conservations Areas.

The SPD states:

There are several historic buildings of notable architectural merit and local significance. A key urban design objective is to preserve and enhance the existing qualities of Orpington's townscape, landscape, and streetscape character."
(SPD Paragraph 4.5, p 14)

and

...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).
(SPD, 5.14, p26)

Officers at the GLA also have concerns about tall buildings in the area. Their report asks for further information:

In terms of visual impact, the proposal has focused the tallest buildings centrally and near other taller buildings within the town centre. Nevertheless, the prevailing building height within the town centre is two to seven storeys and the site is within close proximity to both a conservation area and a low-rise residential area to the east. Although the principle of locating the highest buildings at the middle of the urban block is logical, tall buildings have a profound impact on the character of an area, as well as the legibility of the urban fabric and city image, and the height of buildings should play a proportional role in the wider townscape. As such, further information is required on how the proposed heights of the buildings fit within the hierarchy of tall buildings in the wider area and in the borough. At present, although the maximum building heights raise no strategic concern, GLA officers are of the view that the proposed massing appears to coalesce in the skyline.
(GLA Planning report GLA/2022/0072/S1/01, 35, p10)

Planning permission is often granted using existing buildings as precedents. It is a real concern, therefore, that even if a single 12 – 15 storey building is constructed in Orpington East, developers may get permission to build several more tall buildings in the Eastern Edge, Western Edge, Orpington High Street and the Orpington Station and York Rise sub-areas. This would be terrible for the town and its residents. Furthermore, the precedent could be used throughout the area and there could be successful submissions for tall buildings elsewhere, e.g. in Derry Downs.

- [The SPD should state that no building can be taller than Brunswick House which is 9 storeys high. Orpington already has a 'wayfinding' building – the College, which is 11 storeys high.](#)

The quality of place and life, together with the safety of those living in tall buildings is more important than the number of people who could be housed. Council members will be aware of the public inquiry into the fire which destroyed Grenfell Tower in 2017. Sir Martin Moore-Bick is the Chairman of that inquiry, which published Phase I of its report on 30 October 2019. We urge all Council members to read the report and consider its contents when finalising the SPD. Phase II of the inquiry is ongoing:

<https://www.grenfelltowerinquiry.org.uk/phase-1-report>

We further suggest Council members read “*Building a Safer Future Independent Review of Building Regulations and Fire Safety: Final Report*”, published in May 2018. It is the result of a government commissioned independent inquiry, chaired by Dame Judith Hackitt, former Chair of the UK Health and Safety Executive. We urge all Council members to consider its contents when finalising the SPD.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707785/Building_a_Safer_Future_-_web.pdf

During the public meeting on 12 April 2022, we were reminded of the serious safety and accessibility concerns around housing disabled people in high-rise blocks. Areli’s plans do not include providing Personal Evacuation Emergency Plans (PEEPs) for people who cannot escape high-rise buildings unaided. Areli should be contractually obliged to do this once residents have moved in.

According to Disability Rights UK, more than 40% of the Disabled residents of Grenfell Tower died in the fire. This was due to many not having access to a safe means of escape:

<https://www.disabilityrightsuk.org/news/2022/april/government-rejects-compulsory-personal-emergency-evacuation-plans-peeps>

- The SPD should state that all developers building high-rise homes will be contractually obliged to fund and carry out PEEPs once residents have moved in. PEEPs for subsequent residents should be funded by the management company or freeholder.
- The SPD should state that developers must fully uphold several legal obligations, including the Fire Safety Order 2005, the Equality Act 2010, and the Human Rights Act 1998, as a condition of planning permission being granted. We trust that our Councillors and Officers will go beyond what legislation requires and view the safety of disabled people and other vulnerable people across the borough as a moral obligation.

It is not acceptable for disabled people to access their homes via goods or service lifts. Plans should ensure adequate disabled only parking bays, thoughtfully placed to maximise accessibility.

- The SPD should state that planning applications must provide fully accessible lifts which accommodate all types of wheelchair and mobility scooter.

Councillors and Officers should ask themselves if it is wise to house disabled and vulnerable people in high-rise blocks in the first place. The best way for developers and the Council to get this right would be to liaise closely with disabled people from the outset.



(Source: NttW – Public meeting 12 April 2022)

We suggest Officers and Councillors liaise closely with those conducting the review and independent inquiry into high-rise living in Croydon, which was announced in March last year.

We hope the Council agrees that it is vital to build Orpington's future based on lessons learned from past experiences.

Shadowing, Accessibility and Winds

It is good to see Orpington's strengths and what it has to offer acknowledged in the SPD:

The successful retail offer in Orpington has been maintained in recent years. During the pandemic, the use of the public realm has been enhanced, supporting the commercial use the pavement by cafes and restaurants. The town centre has shown remarkable resilience during the pandemic...

(SPD, 3.11, p11)

When Covid restrictions were eased it was wonderful to see the High Street spring back to life with the new al fresco dining offerings. We support the permanent easing of restrictions which would allow for the continuation of such facilities and await the outcome of the Government's consultation exercise on the matter.

However, when designing our public spaces the SPD should prioritise accessibility. It should state that street furniture should not cause difficulty for disabled people navigating the town's pavements. This is especially important for visually impaired people and wheelchair users. The SPD should also emphasise the necessity of accessible public transport to existing and future attractions and facilities.

- [The SPD should prioritise accessibility when designing street layout.](#)

The SPD does not specifically refer to shadowing or winds. Shadowing caused by tall buildings results in a dramatic loss of light in the surrounding homes, offices and streets. This may affect the accessibility of the town, especially for people with visual impairments and the SPD should oblige developers and Councillors to assess the possible impact.

- The SPD should include an obligation for the Council to carry out real-time computer simulations which clearly show the shadowing caused by proposed buildings. It should also state that proposed buildings which would cause significant light loss and shadowing be denied planning permission. Few people will want to dine, cycle, wheel or walk in a High Street made cold and dark by the shadows cast by tall buildings.

Accelerated winds near tall buildings are caused where the air hits a building and, with nowhere else to go, is pushed up, down and around the sides, known as the "downdraught effect". At worst, strong winds can be very dangerous to life and property and for the most part are not pleasant for pedestrians.

- The SPD should oblige the Council to commission professional reports to ascertain if any development plans might encourage winds.

National planning policy and guidance

The Government's intention to rejuvenate High Streets is very welcome:

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.*

(SPD 2.5, p6)

It is not acceptable for developers to demolish several existing fully functioning shops in the shopping centre and replace them with smaller retail units under tower blocks. New units must offer the consumer the same or better facilities.

- The SPD should make it clear that if the Walnuts Shopping Centre is demolished new retail space should equal or exceed the floor area which has been lost. Some individual retail units should be large enough to attract popular national retailers in addition to smaller units which are designed to attract independent retailers.
- The SPD should state Councillors will thoroughly scrutinise development applications and reject any plans which do not genuinely improve the public realm and create safe and clean spaces.

Access to parks and nature

Orpington is in an area of deprivation in terms of green space – parks and access to nature.

The SPD states that:

Orpington is designated both as an 'Area of Local Park Deficiency' and an 'Area of Deficiency in Access to Nature'. The creation of green spaces (including pocket parks),

providing linked habitats and green corridors, provides opportunities for biodiversity to flourish through linkages between local Sites of Interest for Nature Conservation (SINCs).

(SPD, p8, 5th bullet point)

- The SPD should state that proposed developments should provide additional outdoor space for the wider community as well as private outdoor space for new residents.

Infrastructure

Having a “Vision For Orpington” is an aspiration which can only be delivered within the capacity of Orpington’s infrastructure. The SPD recognises the need for the infrastructure to be enhanced:

However, 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.

(SPD 2.19, p9)

- The SPD should include facts about the capacity of the town’s existing infrastructure. The Council should obtain up-to-date reports on the availability of local nursery, primary and secondary school places, capacity at local GP surgeries and at local hospitals.

The Council should also consult the Metropolitan Police. We understand police provision for each ward is 1 Sergeant, 2 Police Constables and 1 Police Community Support Officer, regardless of the population of that ward. Increased population could stretch police resources, so there needs to be a permanent police presence in Orpington town centre if extra housing is built.

Accepting a sum of money from developers under the Council Infrastructure Levy (CIL) or by other routes does not absolve Officers and elected Councillors of their responsibility to ensure developments do not overload our existing infrastructure. However, the Council should agree with Areli, or any other developer, that a large sum of money should be set aside and ring-fenced for use within Orpington town centre, to pay for the extra infrastructure required to support their plans.

- The SPD should clearly state the density of new housing which the existing infrastructure can realistically support. Developers should have clear and deliverable plans on how to expand the infrastructure if larger numbers of homes are proposed. Developers should also bear most of the cost of any expansion.

Design and Density

Planning applications should be judged on the quality of the design and the quality of the materials used, especially on the exterior of buildings. Naturally, exterior materials should meet safety requirements, but they should also enhance the appearance of an area.

- The SPD should state that the external appearance of developments are important and that quality materials should be used which not only comply with safety

standards, but are also pleasing to the eye and are in keeping with the surrounding area.

The SPD states that density should be “*design-led*” and “*respond to the particular characteristics of the site, its surroundings...*”(5.12, p25). It clearly states that quality of place should take precedence over the quantum of new development:

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.

(SPD guidance note 10, p25)

which conflicts with the following statement regarding the redevelopment of Orpington East:

Redevelopment offers the opportunity for delivering a significant quantum of new housing and commercial development...

(SPD, 6.3, p35)

- The SPD should be clear that the focus is on quality of place, not the quantity of new development.

When assessing planning applications the Council should take account of the many residential developments currently taking place locally. A recent survey carried out by Orpington residents and collated by Carol Pitman shows the number of homes approved, under construction or on sale in Orpington, many within close proximity to the High Street: 417 flats & 29 houses. In Petts Wood this amounts to 62 flats. That’s a total of 479 flats and 29 houses. 508 properties in all. (see the following survey)

PROPERTIES ON SALE, UNDER CONSTRUCTION OR WITH PLANNING PERMISSION

OBSERVED BY RESIDENTS OR

TAKEN FROM THE HOUSING TRAJECTORY (2021) **PROPERTIES WITHIN WALKING**

| DISTANCE OF THE WALK | SOURCE | RESIDENTS' DESCRIPTION | STATUS | HOUSE NO. | ROAD | POST CODE | Planning Ref | STOREYS (inc ground) | TOTAL | FLATS | HOUSES |
|----------------------|------------|--|----------------------|-------------|-----------------|-----------|----------------------|----------------------|-------|-------|--------|
| 1a | Residents | West House | On sale | 46 | High Street | BR6 0JQ | 19/02782/ FULL1 | 4 | 3 | 3 | 0 |
| 1a | Residents | West House | On sale | 46 | High Street | BR6 0JQ | 19/00294/ RESPA | 4 | 17 | 17 | |
| 2 | Residents | Woolworths | Permission granted | 208-212 | High Street | BR6 0LL | Not found | 5 | 40 | 40 | 0 |
| 3 | Residents | Ozan Court (ex EWM shop) | Available to rent | 173-175 | High Street | BR6 0LW | 17/02330/ FULL1 | 4 | 8 | 8 | 0 |
| 4 | Residents | Iceland / St Christophers /Pumfrey & Lythaby | Under construction | 159 | High Street | BR6 0LN | 15/01690/FULL3 | | 9 | 9 | 0 |
| 5 | Residents | Above Accountants | Permission granted | 304a | High Street | BR6 0NF | 21/04102/FULL1 | 3 | 2 | 2 | |
| 6 | Residents | Palm Tree House (ex Bancroft House) Floors 2-3 | Under construction | 251 | High Street | BR6 0NZ | 21/00108/RESPA | 4 | 33 | 33 | 0 |
| 7 | Residents | Greytown House | Prior approval | 221-227 | High Street | BR6 0NZ | 18/01564/ RESPA | 3 | 8 | 8 | 0 |
| 8a | Residents | Site 11 / Clarion Housing | Under construction | 18-28 | Homefield Rise | BR6 0RU | 20/02697/FULL1 | 4 | 37 | 37 | 0 |
| 8b | Residents | Site 11 / Clarion Housing | Under construction | 38-44 | Homefield Rise | BR6 0RU | 20/02697/FULL1 | 4 | 31 | 31 | 0 |
| 8c | Trajectory | Site 11 / Clarion Housing | Trajectory - site 11 | 34-36 | Homefield Rise | BR6 0RU | Trajectory - site 11 | 4 | 17 | 17 | 0 |
| 9 | Residents | Roberts Mews | Prior approval | 4 | Roberts Mews | BR6 0JP | 21/02673/RESPA | 2? | 2 | 2 | |
| 10a | Residents | Midas House | Under construction | 2 | Knoll Rise | BR6 0EL | 21/00854/RESPA | 4 | 20 | 20 | 0 |
| 10b | Residents | Midas House | Under construction | 2 | Knoll Rise | BR6 0EL | 21/04439/FULL1 | 4 | 9 | 9 | |
| 11 | Residents | Barn Hawe | On sale | | Church Hill | BR6 0HE | 18/00967/ FULL1 | 2 | 6 | 6 | 0 |
| 12a | Residents | Innovo Apartments | On sale | 27 | Elmcroft Road | BR6 0FG | 18/02103/ FULL1 | 3 | 4 | 4 | 0 |
| 12b | Residents | Innovo Apartments | On sale | 27 | Elmcroft Road | BR6 0FG | 16/03670/ RESPA | 3 | 8 | 8 | 0 |
| 13 | Residents | Edinburgh Lodge | On sale | 27 | Station Road | BR6 0SA | 17/03505/RECON1 | 3 | 27 | 27 | 0 |
| 14 | Residents | Wilgars, Station Road | Permission granted | 50 -54 | Station Road | BR6 0SA | 20/00946/FULL1 | 3 | 6 | 6 | 0 |
| 15 | Residents | Doctors' surgery | Under construction | 7A-7B | Tubbenden Lane | BR6 9PN | 20/00410/FULL1 | 2 | 2 | 2 | 0 |
| 16 | Residents | Lubbock House | Under construction | 1 | Northholme Rise | BR6 9RF | 20/01280/OUT | 4 | 43 | 43 | 0 |
| 17 | Residents | Crofton Halls (South) | Permission granted | Small Halls | York Rise | BR6 8PR | Site 12 | 4 | 35 | 35 | 0 |
| 18 | Residents | Triumph House | On sale | | York Rise | BR6 8PR | Not found | 4 | 7 | 7 | 0 |
| 19 | Residents | Oregon Square | Permission granted | 39-41 | Oregon Square | BR6 8BH | 16/00634/OUT | 2? | 8 | 0 | 8 |
| 20 | Residents | Borkwood Court | On sale | | Sevenoaks Road | BR6 9LA | 18/00142/ FULL1 | 3 | 11 | 6 | 5 |
| 21 | Residents | Orpington Hospital estate | Under construction | 9 | Helegan Close | BR6 9XJ | 16/05900/ OUT | 2 | 8 | 0 | 8 |
| 22 | Residents | Craven Road | Under construction | Former 65 | Craven Road | BR6 7RU | 21/04014/FULL1 | 2 | 3 | 0 | 3 |
| 23 | Residents | Bruce Grove/Dryden Way | Permission granted | 28 | Bruce Grove | BR6 0HF | 21/00883/FULL1 | 2 | 8 | 8 | |
| 24 | Residents | Goddington Manor | Permission granted | | Court Road | BR6 9AT | 20/00307/FULL1 | 2 ? | 2 | | 2 |
| 25 | Residents | Facing Gravel Pit Way from Lancing Rd garden | Permission granted | 21 | Lancing Road | BR6 0QS | 21/01425/OUT | 3 | 5 | 5 | |
| 26 | Trajectory | Laitwaites, Locksbottom | Permission granted | 348 | Crofton Road | BR6 8NN | 18/01247/ FULL1 | | 3 | 3 | 0 |

ORPINGTON

LAST UPDATED 16-May-22

PROPERTIES ON SALE, UNDER CONSTRUCTION OR WITH PLANNING PERMISSION
OBSERVED BY RESIDENTS OR TAKEN FROM THE HOUSING TRAJECTORY (2021)

PROPERTIES WITHIN WALKING DISTANCE OF THE WALNUTS inc Petts Wood

| NO. | SOURCE | RESIDENTS' DESCRIPTION | STATUS | HOUSE NO. | ROAD | POST CODE | Planning Ref | STOREYS (inc ground) | TOTAL | FLATS | HOUSES |
|---|------------|---------------------------------------|--------------------|---------------------------------|--|-----------|----------------------------------|-------------------------|--------------|------------|-----------|
| 27 | Trajectory | Land Rear Of 148 To 152 | Permission granted | Rear of 148 - 152 | High Street | BR6 0JR | 18/03913/ FULL1 | | 2 | 2 | 0 |
| 28 | Trajectory | Greek Mezze | Permission granted | 165-167 | High Street | BR6 0LW | 18/04523/FULL1 | 3 | 4 | 4 | |
| 29 | Trajectory | Amano | Permission granted | 286 - 290 | High Street | BR6 0LU | 17/04642/ FULL1 | | 5 | 5 | |
| 30 | Trajectory | Robert Dyas / Rymans | Permission granted | 174-176 | High Street | BR6 0JW | 17/04817/ FULL1 | | 6 | 6 | |
| 31 | Trajectory | Supercuts | Permission granted | 264 | High Street | BR6 0NB | 21/02396/FULL1 | | 2 | 2 | |
| 32 | Trajectory | Takeaway food | Permission granted | 182A | High Street | BR6 0JW | 19/01011/FULL1 | | 2 | 2 | |
| 33 | Trajectory | Broad Walk | Permission granted | Land adjoining St Margarets | Chelsfield Lane | BR6 7RS | 17/02621/ OUT | | 2 | | 2 |
| 34 | Website | Land on sale with planning permission | Permission granted | Land adjacent to 16 | Ramsden Road | BR5 4LT | 21/04697/FULL1 | | 1 | 0 | 1 |
| SUB-TOTAL : ORPINGTON | | | | | | | | | 446 | 417 | 29 |
| 35 | Residents | Petts Wood Epicho | On sale | Bayheath House & Cardinal House | Fairway or Cardinal Square, Petts Wood | BR5 1EG | 18/04635/RESPA 19/03941/RECON | 4 | 25 | 25 | |
| 36 | Residents | Petts Wood, Morrisons | Permission granted | 70 | Queensway, Petts Wood | BR5 1DH | 19/01185/RESPA | | 30 | 30 | |
| 37 | Residents | Petts Wood, Linays Commercial | Prior Approval | 26a | Station Square, Petts Wood | BR5 1NA | 17/05446/RESPA | | 2 | 2 | |
| 38 | Residents | Petts Wood, Villa May | Permission granted | Villa May | Lakeswood Road, Petts Wood | BR5 1BJ | 19/05118/FULL1 | | 5 | 5 | |
| SUB-TOTAL : PETTS WOOD | | | | | | | | | 62 | 62 | 0 |
| TOTAL : ORPINGTON & PETTS WOOD | | | | | | | | | # 508 | 479 | 29 |

NOTES

Some of the properties were previously residential, so that number would be deducted to show the net increase in residential units. Regardless, the numbers give an indication that in the 487 properties are highly likely to be completed within the same housing target period as the Areli development, (in addition to others that may come forth in the target period 2019/20 -2028/29 for 7,740 units).

The significant majority of new residential units are flats.

There are no high-rise buildings planned to be constructed, in keeping with the existing character of the area.

There are likely to be omissions from this list.

ORPINGTON

LAST UPDATED 16-May-22

PROPERTIES ON SALE, UNDER CONSTRUCTION OR WITH PLANNING PERMISSION
OBSERVED BY RESIDENTS OR TAKEN FROM THE HOUSING TRAJECTORY (2021)

PROPERTIES WITHIN WALKING DISTANCE OF THE WALNUTS inc Petts Wood

| NO. | SOURCE | RESIDENTS' DESCRIPTION | STATUS | HOUSE NO. | ROAD | POST CODE | Planning Ref | STOREYS (inc ground) | TOTAL | FLATS | HOUSES |
|---|--------|---|--|---------------------|---------------------|---------------------------------|-----------------|----------------------|-----------|-----------|----------|
| WATCH LIST - PLANNING APPLICATIONS ORPINGTON | | | | | | | | | | | |
| | | Specsavers/ Ryman | Application submitted | 169-171 | High Street | BR6 0LW | 18/04523/ FULL1 | 4 | 16 | 16 | 0 |
| | | Above Barbers | Application submitted | 240a | High Street | BR6 0LZ | 22/00041/FULL1 | 3 | 4 | 4 | |
| | | Charterhouse Surgery | Application submitted | 59 | Sevenoaks Road | BR6 9JN | 22/00040/FULL1 | | 1 | 1 | |
| | | AboveThornburrows / Bon Marc | Application submitted | 257-259 | High Street | BR6 0NY | 22/01578/CUETC3 | | 9 | 9 | |
| | | Keniston. Land opposite Isabella | Application submitted | opposite 165-193 | Isabella Drive | BR6 7UL ? | 21/05278/FULL1 | | 26 | 26 | |
| PLANNING APPLICATIONS SUBMITTED | | | | | | | | | 56 | 56 | 0 |
| WATCH LIST - PROPERTIES TO MONITOR ORPINGTON | | | | | | | | | | | |
| | | Middlewood Court Phase 1 (flats) and 2 houses | Sold, no Application found | | | BR5 1FF? BR5 1HH BR6 8JD? | Not found | | 7 | 7 | 2 |
| | | Swanscombe House | Residents moved out. Building unoccupied. Reason unknown | | Cotmandene Crescent | BR5 3RF | Not found | | 0 | | |
| | | Princess Parade | Rumour | | Locksbottom | BR5 8NP | | | 0 | | |
| | | Above Bon Marche | Permission refused | 253-255 | High Street | BR6 0NY | 17/03781/FULL1 | | 0 | 0 | |
| | | | | | | | | | # | # | # |

- The SPD should include the number of homes, including new homes built in each area for every year during the target period to date, 2019/20 – 2028/29. In this way Council members can judge the degree to which some areas are being over developed.

There was a recent *Call For Sites* by the Council and we are interested to know if more sites for homes could be identified across the borough.

A written question was submitted to the full Council meeting held on 11 April 2022:

Question:

When will the recent Call for Sites be discussed and the results published?

Reply:

Consideration of the call for sites responses is ongoing. The Council will use the responses to the call for sites to inform the approach taken to the Local Plan review; there will be various rounds of consultation on draft Local Plan documents in future that will be subject to consultation. Where necessary to help justify our proposed approach, the call for sites responses will be published as part of future consultations.

Having smaller, more numerous sites throughout Orpington, particularly in the less densely populated outlying areas would lessen the impact of having an increased population in a small urban area. As mentioned, much of the development currently taking place is for flats and in addition to these, Areli proposes to build nearly 1,000 more.

We could well be heading for a severe shortage of family houses, and families could be trapped in cramped unsuitable flats. We suggest that when the Council draws up the Local Plan it seeks to identify suitable outlying areas, already mainly residential in character, which could accommodate a small number new family houses, with space for gardens and parking.

- The SPD should fully explore the potential of smaller sites away from the town centre with a view to dispersing development across the borough to accommodate families.

The Walnuts Leisure Centre (WLC) and the Saxon Centre

The WLC is the jewel in Orpington’s crown. It is immensely important to many residents and shows that the town is truly people focused. The centre is one of the most diverse places in Orpington in terms of the ages, ethnicity, social backgrounds and ability of the people who use it. It is vital to those managing serious health issues and disabled people. The Saxon Centre is used by many elderly people and is operated by Age Concern Orpington & District, a not for profit, charitable company.

We can see only 2 references in the draft SPD to a new leisure centre (below) and these do not invite comments or present alternatives to demolishing the Walnuts Leisure Centre

(WLC). Referring to a 'new' leisure centre implies that demolition is a fait accompli. If the centre is demolished, the building of a new one would take years and the public would be without facilities in the town. This is unacceptable.

The Walnuts has come forward as a potential large-scale redevelopment of the current Walnuts Shopping Centre and Leisure Centre site. Redevelopment offers the opportunity for delivering a significant quantum of new housing and commercial development, alongside a new leisure centre, public realm enhancements and provision of significant green space / play space / street greening.
(SPD, 6.3 p35)

Market Square is the civic heart of Orpington, providing an accessible space which plays host to the market and various events. Future development should ensure the retention of the existing uses and avoid interventions which may affect the future viability or operation of the market or compromise the event space function. Redevelopment of the square offers the potential for significant enhancement to create a more attractive and appealing space in which to gather, socialise, shelter, and dwell, activated by shops, cafes, a new leisure centre, college, and other community facilities.
(SPD, 6.5 p36)

The land on which the WLC and the Saxon Centre is built remains publicly owned. Therefore, the Council would need to do a land deal in order for developers to be able to demolish it.

No Council led independent public consultation about the future of the WLC or the Saxon Centre has been carried out. Relying on public feedback on planning applications or to the draft SPD is no substitute for a proper consultation. Considering the WLC a public asset used by around 19,500 people each month and the Saxon Centre is a crucial community provision, a public consultation is vital.

In their reply to 2 questions I submitted to Development Control Committee (DCC) meeting held on 19 April 2022, the Committee promised that a public consultation will be carried out:

Question 1:

Has the Council carried out its own public consultation into the future of the Walnuts Leisure Centre and Saxon Centre in relation to the Areli's recent development proposals: if so when and where was this held?

It may help to refer to Section 6.9 of the LBB of Bromley Report No. HPR2021/061 - November 2021. Here's the relevant extract:

Section 6, Legal Implications, 6.9 states:

"The report set out developer public engagement to date, if the Council considers an option that impacts on leisure or other community provision, the Council will need to consider its own public consultation".

Reply:

No.

Question 2:

If the Council is yet to carry out its own public consultation please tell me when it plans to do so?

Reply:

This isn't strictly speaking a planning matter, however if a land deal were agreed in principal with Arelli (sic) in return for reprovision of the leisure facilities, then a public consultation would be undertaken.

- The SPD should insist that any development which would impact on the WLC and the Saxon Centre be subject to a Council led independent public consultation taking place, as promised by the DCC.
- The consultation should take place before any land deal is formally agreed with Areli, otherwise the consultation will be seriously compromised.
- This consultation should liaise closely with each of the user groups named in this section and follow Government principles for carrying out consultations: <https://www.gov.uk/government/publications/consultation-principles-guidance>
- The SPD should state that consultations should include the following options:
 - the refurbishment of the existing leisure centre over time
 - the building of a new leisure centre, next to the old one, before demolition
 - the building of a new leisure centre, near the town centre, before demolition.

The WLC has *sport* as well as leisure facilities and the size of the current centre supports this. The new leisure centre promised by Areli will be smaller, but we need and want practical facilities. The GLA planning report recognises this and asks for details of how the town's leisure facilities will not be interrupted during construction:

The proposal includes the reprovision and improvement of existing leisure facilities on the site which is welcome. Notwithstanding this, it should be demonstrated that there is no net loss of provision in terms of floorspace and access to a comparable range of sports and leisure facilities. Further, the Council must ensure that the costs of accessing and using the facilities would be maintained at similar levels, to avoid the exclusion of current user groups. Meanwhile arrangements during construction, with the aim of ensuring no interruption in the leisure facilities available for the community, should be further explained.

(GLA Planning report GLA/2022/0072/S1/01, 21 March 2022, 17, p6)

Among the facilities are a:

- teaching pool
- main pool (33m in length)
- sauna
- steam room
- sports hall
- gym
- crèche
- café
- soft play area for younger children (Buzz Zone)

The following FOI request: FOI NP6F2C4NHQ was submitted to the Culture and Regeneration department, and here is the response:

The Local Plan (LBB Infrastructure Delivery Plan, Nov 2016) states there are 13 public leisure centres with pools in the LB Bromley. I do not believe this is correct. Can you please:

Question 1:

Confirm the number of public leisure centres with pools which are open and fully operational in the LB of Bromley.

Reply:

There are currently 6 centres with pools within the London Borough of Bromley currently open.

Question 2:

Provide a list of names and the locations of each of these public leisure centres with pools, as defined in point 1.

Reply:

Please see the hyperlinks below which will give full information on each centre.

- *Biggin Hill Memorial Library and Pool*
- *Darrick Wood Swimming Pool*
- *Pavilion Leisure Centre*
- *Spa at Beckenham*
- *Walnuts Leisure Centre*
- *West Wickham Leisure Centre*

Providing uninterrupted facilities should the leisure centre be demolished cannot be achieved by directing users to other sites.

The swimming pools at Biggin Hill, Spa at Beckenham and the West Wickham are too far away. Darrick Wood is far too small. The Pavilion Leisure centre is a fun pool with a wave machine, which is not suitable for lane swimming.

The Ojays Swimming Club has successfully trained at the WLC and has won many trophies. If the pool was fitted with a 25m boom (a mechanical device used to divide swimming pools into areas), competitions could be held there too. This would be fantastic for the club and attract many visitors to the town centre.

Local schools use the WLC for class swimming lessons and there are also private group swimming lessons for children. The pool is also used for community events like *The World's Biggest Annual Fundraising Swimathon* for Cancer Research UK and Marie Curie (May 2022). There are also school holiday activities for children.

It is no easy matter to re-site dryside activities. Orpington Gymnastic Club also train at the WLC in the main sports hall. This promotes the enjoyment of women's artistic gymnastics in Orpington and surrounding areas for those aged 5 – 18 years old. The disciplines of Floor, Vault, Asymmetric Bars and Beam are taught.

There are Multisports classes specifically aimed at disabled youngsters; karate classes for those aged over 13 years and roller skating events. Adult exercise classes include spin, yoga and Pilates.

The use of Crofton Halls for Primetime classes highlights the lack of facilities in community halls. There are no showers, no changing facilities and no lockers.

Similarly, re-siting the Buzz Zone soft play area in community halls is just as complex. Many do not have the height to accommodate slides etc, adequate toilet facilities or parking for the volume of users.

- [The SPD should insist that developers give full details at the outset about how they will ensure that the town's leisure facilities will not be interrupted during construction.](#)

On the subject of financial robustness of developers, below are written questions, together with replies, submitted to the Council meeting held on 28 February 2022.

Question 1:

Can Bromley Council carry out a financial risk assessment on Areli Real Estate? Areli plan to rebuild the leisure centre last. If funds run out prior to reconstruction we could be left with no pools.

Reply:

It is extremely likely that if this planning application is approved, Planning conditions would prevent the housing being lived in, and therefore the completion of sales, prior to the full completion of the leisure centre. Therefore, the risk of the development coming forward and the leisure centre not being delivered is very unlikely. The

Council always undertakes financial due diligence prior to entering into formal agreements, and this case will be no different if the Council progresses with a land deal.

Question 2:

Can the Council obtain quotes to rebuild a like-for-like leisure centre in Orpington town centre? The Council should obtain, in advance, the money required to rebuild, and refund it when the new leisure centre is completed satisfactorily.

Reply:

The cost of refurbishing the existing leisure centre to a new standard is c£10m. The costs of building a new leisure centre as part of the Areli development is c£21m and this has been scrutinised by the Council's specialist consultants working on our behalf. It is very unlikely that Areli would be able to access the funding to give this sum to the Council upfront, however any land agreements (if the Council pursues this) would look to mitigate risk in other ways, e.g. input into the construction contract.

The Council calculates the risk of a development not being completed and the rebuild of the centre not delivered as "unlikely". A risk is still a risk, however small, and as the centre is a public asset, any risk, undertaken unnecessarily, is unacceptable.

On the face of it, it would be significantly cheaper for Areli not to demolish the WLC it but to contribute to its refurbishment as part of its CIL or similar. The cost of refurbishing the leisure centre is c£10m, with a new leisure centre costing c£21m as part of the Areli development. It is not clear whether the c£21m would be spent solely on building a new leisure centre or is the total cost of constructing the entire building in which the new centre would reside, and which would likely include residential units.

The Council states that it *"always undertakes financial due diligence prior to entering into formal agreements, and this case will be no different if the Council progresses with a land deal."*

As part of the Council's due diligence process, a comprehensive financial risk assessment should be carried out on Areli and Tikehau Capital before planning permission is granted. This should apply to all developers and their backers looking to undertake large scale development projects in Orpington, regardless of whether proposals include deals which would impact on publicly owned assets.

Furthermore, the Council states that. *"...It is very unlikely that Areli would be able to access the funding to give this sum to the Council upfront, however any land agreements (if the Council pursues this) would look to mitigate risk in other ways, e.g. input into the construction contract."*

This is very concerning. If Areli does not have c£21m capital available within the company to invest, how does it propose to deliver a c£500m project? Inserting a clause into a construction contract is not acceptable given that firms can, and do go into liquidation.

- The SPD should state that a comprehensive financial risk assessment will be carried out before planning permission is granted to Areli, or any other developer undertaking large scale redevelopment projects in Orpington.

Conservative literature published during the recent local election campaign stated that Bromley Council has £0 debt and is the winner for ‘Excellence’ at the Public Finance Awards 2021. We ask the Council to look into investing some of the capital it has into the town. This is public money and if Areli believe that Orpington is a good place to invest, our own Council should do too.

There is no need to demolish the leisure centre. The Council should invest in the WLC itself and follow existing SPD guidance which supports a ‘retrofit first’ approach:

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

(Source SPD guidance note 8, p20)

If, after a full investigation and public consultation, the Council decides a retrofit is not a suitable option for the WLC, it should publish its reasons. It should also insist that Areli, or any developer, rebuild a new like-for-like facility, in Orpington town centre before demolition takes place. This would ensure that local residents do not go without this vital amenity and meet the GLA’s point that leisure services should be ‘uninterrupted’. This would also avert the risk of developers going into liquidation before the new centre is completed, however unlikely the Council believe this would be.

- The SPD should insist that the Council follows it’s guidance and insist on a retrofit approach in respect of the WLC. This is the option favoured by the overwhelming majority of this group’s members in our poll – 87%.
- The Council should invest some of its own capital to refurbish the WLC to support its own ‘retrofit first’ approach.



(Source: NttW) – Public meeting 12 April 2022)

Orpington College

Orpington College should remain solely an educational establishment. Many courses have moved from Orpington College to Bromley College over the last few years. Consideration should be given to running a full range of further education courses for young adults once again. The College would attract many young people into the town centre, as it did in the past. A FOI request, FOI #802024, was answered in December 2021 by London and South East Education Group which supports this:

Question 1:

Are there any plans to re develop the site of the college?

Reply:

The LSEC Corporation has no current plans to develop the site.

Question 2:

Do you have any plans for selling the land?

Reply:

The LSEC Corporation has no plans for selling the land.

Question 3:

What are your plans for the future of this campus?

Reply:

To continue to use the site as it is now for educational purposes

The educational offering of the College could be enhanced with evening cookery classes featuring world cuisine, arts, literacy and exam level classes for adults. A wide selection of evening classes would draw people into the town and benefit the day time and evening economy.

- [The SPD should make it clear that the College should remain an educational establishment and not be used for residential or any other purposes.](#)

**Nuts To The Walnuts Committee
June 2022**