

# NUTS TO THE WALNUTS

## **Nuts to the Walnuts response to the Consultation of the Review of the Bromley Local Plan, Issues and Options, 2023**

This is comment from the Nuts to the Walnuts (NttW) campaign group to the Consultation of the Review of the Bromley Local Plan, Issues and Options (April – June 2023). This feedback is based on the major themes which emerged during our campaign and on comments received from members after publication of a draft of this document on our Facebook page and website.

NttW group informed members of the importance of responding to this consultation, posting the link and encouraging people to send their individual comments via email, post and by using the Survey Monkey. Some members found the survey difficult to complete because of the level of assumed knowledge of certain planning terms such as ‘Circular Economy’ and ‘Greening Factor Score.’

Here is some background about NttWs. NttWs 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 2,600 members. It is non-political and unlike many residents associations which cover defined geographical areas, NttWs is open to all Orpington residents. At its AGM in April this year all serving Committee members were re-elected.

Bromley Council will be aware that Areli withdrew its plans in October 2022 and would consult again regarding new plans, which would not include the WLC. In April 2023 stakeholders were advised by The Walnuts Shopping Centre Project Team that Areli had consulted with local Councillors but had not yet drawn up any new plans. The Team went on to say that Areli are seeking offers for Crown House, which comprises the site of the Odeon Cinema, Nando’s, Taco Bell, B&M, Kutchenhaus, Puregym and Cards Direct.

Additionally, Bromley Council have recently conducted a survey amongst residents regarding the upgrades of the WLC and the West Wickham Leisure Centres. We understand that around 6,000 responses have been received and that some £27m has been set aside for improvements.

NttWs members continue to be committed to the future of Orpington Town Centre. We submitted feedback to the draft Orpington Town SPD last year and understand that ratification of that SPD is due this summer. We would be happy to supply officers with a copy of our SPD feedback submission if this would be helpful.

As well as communicating with members and residents via its Facebook and Website pages, its Twitter account and its YouTube channel, NttW also has also liaised 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 2022.



(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.

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)

### **Bromley Local Plan and the shaping of Orpington Town Centre**

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 in 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.

Members have raised concerns about the possibility of more retail outlets leaving the Walnuts Shopping Centre due to the delay an acceptable redevelopment plans being put forward by Areli.

NttWs conducted a lightning poll on Facebook in June 2022 asking 3 questions in order 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, and 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.

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 proposed.

This response is divided into sections:

- Bulk, Size and Scale. Tall Buildings
- Shadowing, Accessibility and Winds
- Access to parks and nature
- Biodiversity
- Infrastructure
- Design and Density (including a survey)

## **Bulk, Size and Scale. Tall Buildings.**

Orpington Town Centre is characterised by a range of two and three storey buildings, many of which are Mock Tudor or 1930s design which have historic significance and as such should be protected. 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 National Planning Policy Framework (NPPF) advises:

*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).*

In their report on Areli's now withdrawn plan, Officers at the GLA raised 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 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 Local Plan.

<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 Local Plan.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/707785/Building a Safer Future - web.pdf](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>

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.

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

### **Shadowing, Accessibility and Winds**

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.

However, when designing our public spaces the Local Plan 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 Local Plan should also emphasise the necessity of accessible public transport to existing and future attractions and facilities.

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 Local Plan should oblige developers and Councillors to assess the possible impact.

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.

### **Access to parks and nature**

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

The draft 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, 5<sup>th</sup> bullet point)

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

### **Biodiversity**

The impact of any proposed developments on biodiversity e.g. the biodiversity of species, should be an important consideration when deciding whether to grant planning permission. It would be helpful if a Local Habitat map for the Borough could be commissioned and made available publicly if one is not already in place. We understand that a new rule is likely to be introduced in November this year concerning the legislative areas architects should know about regarding biodiversity net gain.

## **Infrastructure**

The Local Plan should state that future developments can only be delivered within the capacity of Orpington's infrastructure. The draft 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 Local Plan 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 Local Plan should state that 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. It should also state that most of the income raised from CIL's should be invested in the immediate vicinity of developments, and not shared across the borough.

## **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 Local Plan 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 Local Plan should be clear that the focus is on quality of place, not the quantity of new development.

When assessing planning applications the Local Plan should take account of the many residential developments currently taking place locally. A survey carried out by Orpington residents last year 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
<b>SUB-TOTAL : ORPINGTON</b>									<b>446</b>	<b>417</b>	<b>29</b>
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	
<b>SUB-TOTAL : PETTS WOOD</b>									<b>62</b>	<b>62</b>	<b>0</b>
<b>TOTAL : ORPINGTON &amp; PETTS WOOD</b>									<b># 508</b>	<b>479</b>	<b>29</b>

**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
<b>WATCH LIST - PLANNING APPLICATIONS ORPINGTON</b>											
		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	
<b>PLANNING APPLICATIONS SUBMITTED</b>									<b>56</b>	<b>56</b>	<b>0</b>
<b>WATCH LIST - PROPERTIES TO MONITOR ORPINGTON</b>											
		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 Local Plan 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 the Council members can judge the degree to which some areas are being over developed.

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.

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

The Local Plan 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. These sites should be small enough not to put pressure on the local infrastructure.

The NttWs committee would be happy to meet Officers pulling together the local plan. Do get in touch via the email used to send this document.

**Nuts to the Walnuts Committee**  
**June 2023**