

**Bexleyheath Development and Improvement Framework
Consultation responses and proposed changes**

Respondent	Issues Raised	Council Response
<p>Nathaniel Lichfield and Partners on behalf of Tesco Store Ltd</p>	<ol style="list-style-type: none"> 1. Support the objectives of the document but suggest that the eastern part of the town is identified as an "Area of Opportunity". 2. Strongly disagree that the Former Woolwich HQ should be redeveloped for primarily residential use, and would like the "developer-led" flexibility recommended on the Civic Offices site to be repeated here with developers determining appropriate land uses (3.0). 3. Request clarity on the status of the document in the LDF (1.1.2). 4. 2.2.6(C) the description of the area to the east as "the Civic Fringe" is disputed as the word fringe implies that the area is outside of the town centre boundary and the civic element will be reducing in the future. 5. Welcome the reconnection of the pedestrian links between the centre and surrounding residential area and support diversifying mix of town centre uses (2.4.2). 6. Suggest improved retail linkages needed to the eastern side of the town. 7. Retail capacity figures are draft and should be referred to as draft (4.1). 8. Welcome that sites identified with development potential will be discussed with landowners (4.3). 9. Request opportunity to make play space provision off site (4.5). 10. Contend that the Former Woolwich site (4.7.1 and 4.6) could meet retail needs and therefore a new anchor store should be located here. Also dispute that the site is suitable for a significant proportion of 	<ol style="list-style-type: none"> 1. Noted. The area was defined as the civic fringe as the Civic Centre is the dominant land use in the area and, despite the potential change in the area, the area is currently adjacent to the main shopping frontage. No change recommended. 2. The Former Woolwich site is located at the very edge of the town centre. As a result it is subject to policy restrictions which do not apply to the civic offices site. The proposed wording reflects this situation. No change recommended. 3. This document will be part of the LDF evidence base. The document will also be formally adopted as a Council strategy and will be a material consideration in planning applications although it will not have the full weight of a SPD. Suggested change - The status of the document will be detailed at section 1 of the report. 4. See response to point 1. 5. Noted. 6. Noted - see response to point 2. The Civic Offices SPD does seek the maximisation of active frontage as part of any development – No change recommended. 7. The retail capacity study has been completed and published. It now forms the local need assessment as required by PPS6. Suggested change - add wording to this effect as a footnote. 8. Noted. 9. Play space should be provided in line with the Mayor's SPD and Bexley's Residential Design Guide "Design for Living". Suggested change - add a reference to these documents. 10. See response to point 2. In addition to this, the Framework does identify retail as a potential element of a mixed use scheme subject to the impact on the viability and vitality of the town centre. The site is also considered to be appropriate for family housing given that it lies directly adjacent to existing residential areas and there is an identified need for family housing in the borough. No change recommended.

	<p>family housing, given its former commercial use and town centre location.</p> <ol style="list-style-type: none"> 11. Tesco welcomes the acknowledgement that the corner of Erith Road/Watling Street has potential to accommodate uses such as retail, commercial and community uses (4.7.1). 12. Support the requirement for high sustainability requirements (4.10), however the Code for Sustainable Homes Level 4 should be subject to viability testing. 13. The closure of Highland Road (5.5.3) has not been assessed in terms of traffic impact, and in terms of air quality, noise and residential amenity. 14. Higher densities are only likely to be permitted to the south and west of the site, however no details of what is meant by higher density is given and Tesco do not understand why high densities are not appropriate at the Former Woolwich location. 	<ol style="list-style-type: none"> 11. Noted. 12. Noted, text at 4.10.4 already allows for a lower level of Code for sustainable homes where it is demonstrated that Level 4 would make the scheme unviable. No change recommended. 13. The proposed closure of the northern section of Highland Road has been an aspiration of the Council for some time, as indicated in the planning brief for the Civic offices site, but has not been subject to detailed modelling. The Council plan to model the junctions in the area in any case so it is recommended this scenario is considered as part of this work, and potentially any more detailed planning application for the area. Suggested change - Additional reference to the desire to close the northern section of Highland Road and prior to that, the need for traffic modelling and impacts on noise, air quality and amenity added to the text. 14. High density is appropriate to the former Woolwich site provided design is in keeping with adjacent residential areas. However the greatest height and massing of buildings should be located adjacent to the junction at the south west corner of the site to create a gateway feature. Higher densities are defined with regard to the density matrix in the London Plan (table 3A.2). Suggested change - Reference to this will be added to the framework.
English Heritage	<ol style="list-style-type: none"> 1. EH supports the approach taken, welcoming the proposals to enhance the heritage assets and their setting. 2. Para 2.1 and 2.4 EH welcomes that the history of Bexleyheath has been considered. Could note that Christ Church and the Clock Tower are both Grade II listed buildings and there are opportunities for enhancing their setting. 3. Para 3 – EH welcomes proposals to enhance public spaces around Christ Church. 4. Para 4.3 and 4.4 – EH supports public realm improvements at Christ Church and Market Place. 5. Para 6.4.5 and 6.5.5 – EH strongly support 	<ol style="list-style-type: none"> 1. Noted. Support welcomed. 2. Noted. Suggested change - adding reference to the listed status of Christ Church and the Clock Tower in this section. 3. Noted. Support welcomed. 4. Noted. Support welcomed.

	<p>proposals to refurbish this heritage asset.</p> <p>6. Para 6.7 – EH suggest that the Clock Tower should be a consideration in this section as a local landmark.</p> <p>7. Para 6.8.4 – EH notes that the framework identifies the need to protect buildings of historic interest.</p>	<p>5. Noted. Support welcomed.</p> <p>6. Noted. Suggested change - adding reference to the Clock Tower as a local landmark in this section.</p> <p>7. Noted. Support welcomed.</p>
Transport for London	<p>1. The Framework represents best practice in terms of smarter travel choices and the area-wide travel plan is an excellent policy statement.</p> <p>2. The principal of legible signage with walking and cycling routes set out is welcomed.</p> <p>3. Section 5.3 suggests cycling could be permitted in the pedestrian section of the Broadway and this should be introduced carefully.</p> <p>4. Pedestrian crossings etc will be required to be designed to meet BV165 standards and all improvements should be made in accordance with DfT's Inclusive Mobility guidance document.</p> <p>5. Proposal to provide a Toucan crossing at Townley Road/Albion Road is welcomed.</p> <p>6. Support the rationalisation of car parking in the town. New development should conform to maximum parking standards set out in the London Plan. Suggest that a parking strategy should be developed to provide a clear message on car parking.</p> <p>7. Recommend that the pedestrianised area should either have servicing behind the buildings or allow servicing vehicles in at some times of the day, with specific loading bays provided.</p> <p>8. TfL supports the NightVision principles of taxi rank relocation and taxi access across the pedestrianised</p>	<p>1. Noted. Support welcomed.</p> <p>2. Noted. Support welcomed. TfL's Legible London project, is being piloted in Bond Street, South Bank, Richmond/Twickenham etc, as a good precedent for way finding improvement. Suggested change - reference to this could be added to section 5.1 and 5.4.</p> <p>3. Noted. Suggested change – add text to 5.3.2 to say "The detailed design of such a shared space scheme will need to be carefully considered, taking into account the comfort and safety of all user groups."</p> <p>4. Noted, this detail would be negotiated at a more detailed design stage.</p> <p>5. Noted. Support welcomed. However the level of detail for the traffic proposals will be reduced in the final document so as not to fetter possibilities arising out of the planned further work on transport in the town centre.</p> <p>6. Noted. Suggested change - a reference to the parking policies set out in the London Plan will be added. The concept of the creation of a parking strategy for the town centre is supported, suggested change - add text to reflect that a parking strategy should be produced in the framework. The retention of an appropriate level of car parking in the town centre is seen as an essential element of the framework as the town centre is very reliant on car borne shopping trips and it is felt the centre would lose out to other nearby shopping destinations if car parking required to sustain the centre after redevelopment was lost.</p> <p>7. Noted. Suggested change is to reflect this in section 5.5 on vehicle access and car parking.</p> <p>8. Allowing traffic (potentially a limited range of traffic such as taxis etc) through the pedestrianised part of the town could be a good way of</p>

	<p>area at night.</p> <p>9. Should ensure total number of bus stands in the area are not reduced and ensure that the messages throughout the document are consistent. TfL do not support the extension of bus routes without justification through a business plan.</p> <p>10. TfL's business plan does not include proposals to extend the Jubilee Line or transit systems for the area, and therefore it is unlikely these will be provided in the plan period and therefore contingency scenarios should be developed.</p>	<p>bringing activity to the town centre at night and the Council plans to commission a study on the feasibility of allowing traffic on the pedestrianised part of the Broadway at certain times of the day. Suggested change – text to be added to highlight this and images altered to illustrate where vehicles could potentially use at limited times of the day. In terms of the comment on taxi relocation, as the framework is trying to bring activity in the evening into the pedestrianised area, as well as the area to the west of the town, moving the taxi stand would not help with this, although it may be appropriate to have an additional formalised private hire cab rank at the western end of town to cater for existing needs which will also meet the objectives of the NightVision document. Suggested change – text to be clarified</p> <p>9. Section 5.4 sets out the potential to extend existing bus routes and potentially make some minor amendments to the existing bus standing arrangements. We are not proposing a reduction in the number/frequency of buses serving the town centre, or for that matter a reduction of the penetration of existing services. We are proposing some changes to where buses stand and wait (rather than stop and pick-up), which may even provide more bus stop capacity in Market Place. The proposal to extend routes to Crayford is a longer term plan and we understand that bus planning tends to be fairly short term. It is recognised that any proposed extensions to bus routes would need to be supported by a robust business case showing evidence of additional passenger demand. Suggested change - text added to clarify TfL's current position on bus route extension in the area.</p> <p>10. This is a long term plan – Suggested change "adding new strategic public transport routes, such as Underground, light rail or tram services, to serve Bexleyheath and the southeast would be strongly supported. The Council will carry out studies in this regard as funding allows."</p>
Bexley Local Agenda 21	<p>1. (para 4.7)The former Woolwich HQ site could be re-used for the Council's Civic Offices.</p> <p>2. (para 4.7.2) Levels of parking must be preserved</p>	<p>1. The proposal to re-use the building has merit in terms of sustainability and the Framework does refer to potential refurbishment. However, the civic office proposals are currently</p>

	<p>otherwise the town will lose out to competitors.</p> <ol style="list-style-type: none"> 3. (4.11.2) Oppose the removal of large roundabouts, although the removal of mini roundabouts is supported. 4. (para 4.11.5) Do not support the pedestrianisation of Highland Road as it is one of the few north/south links. 5. (para 5.2.1) staggered crossings must be retained. 6. (para 5.2.2) suggest installing a one way only turning onto Royal Oak Road. 	<p>being developed on the existing Council office and adjacent Broadway Square sites. No change recommended.</p> <ol style="list-style-type: none"> 2. Noted. 3. Noted. The roundabouts in question are all small scale however, any proposed change would be investigated in detail in further work by the Council. 4. Highland Road is not currently well used by vehicles and creates a barrier to pedestrians between the core and eastern end of the town centre therefore, provided the additional traffic modelling work undertaken indicates that changes to the traffic flow will not be unreasonable, it is not recommended that this is altered. No change suggested. 5. Noted. The central reservations are considered a real barrier to pedestrian movement, but the final detail of the design of the crossing will be left to future studies, therefore no changes are suggested. 6. The circulation of traffic has been considered by the transport consultants, and potential changes are shown in the framework document. Further transport studies will consider the detail of any layout changes. No change recommended.
United Reformed Church Bexleyheath (Geddes Place)	Surprised that the Geddes Place Church is not mentioned in the policy document.	The framework is planning for change in the town centre and Arnsberg Way sites were identified for long term change to address security and townscape issues in the area. We recognise that the Church is an important element in the town centre. Therefore the suggested change is to make reference to its presence and a requirement for it to be replaced as part of any redevelopment added to the text.
Local resident (Warren Close)	<ol style="list-style-type: none"> 1. (para 6.11.4) The clinic is very well used and parking is a significant issue that should be taken into consideration when progressing the planning of the town. 2. (para 5.3) Introducing cycling into the pedestrianised part of the town centre is not supported. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. See response to point 3 of the TfL response above.
Laughing Buddha restaurant	1. Roundabout by HSBC – support the NightVision proposal to slow down traffic and remove barriers at this point and not the Framework’s proposals to change this to a signalised junction.	1. Noted. The simplification of the junction is the aim of the proposals set out, so it may not necessarily be as shown in the draft document as detailed traffic analysis should be undertaken to work out the best way to achieve this without affecting required road capacity. The

	<ol style="list-style-type: none"> Support the re-provision of car parking lost from Oaklands Road car park in a similar location and not closer to the town centre as this will draw trade from further west. 	<p>movement illustrations will be amended to reflect the need to ensure there is potential for a variety of transport options to be implemented to achieve this as stated in response to TfL. No further change recommended.</p> <ol style="list-style-type: none"> Noted. As part of any proposed redevelopment on the Oaklands Road car park site, a level of public parking will be required. Suggested change - It is suggested that text is amended to reflect this requirement and also to highlight the need for better signage and links to existing public parking such as the nearby Bowling Alley parking.
Local resident (Broadway)	<ol style="list-style-type: none"> Road sweepers start earlier than 9am and cause a disturbance. Disturbance to residents needs to be taken into account – often ignored. Buskers/street traders is a problem –there is no one to enforce at weekends. Street café – noise will need to be controlled. 	<ol style="list-style-type: none"> This issue has been passed to Highways & Amenities to respond to. Residential amenity protected through existing planning policy and nuisance and licensing laws. Balance needs to be struck between safeguarding amenity and encouraging viability and vitality. No change A duty officer arrangement is in place on Saturdays to deal with any complaints which may arise. No cover presently provided on Sundays. The matter has been raised with the service area See response to 2. above
Cllr John Waters	<ol style="list-style-type: none"> Do not support re-engineering of junctions – they are unlikely to generate stream of pedestrians down Townley Rd, Avenue Rd and from the Station Does not support vehicles into pedestrian areas due to safety. 	<ol style="list-style-type: none"> The night vision audit suggests that surrounding roads form a barrier to movement and figures show low pedestrian and cycle usage of the town centre. Junction simplification is considered a key response to this. No change The introduction of traffic onto the pedestrianised area is suggested but further work on the feasibility of this, including safety issues, would be required before this could be formally proposed. No change
Church of England	<ol style="list-style-type: none"> Christ Church Square – this concept could be welcomed, however the area to the rear of the church has suffered with vandalism and in the past residential development in connection with the rebuilding of the hall facilities has been considered and it is recommended that an element of residential development is needed in this area. The aims of the 3 landowners have not been adequately considered – these are Christ Church, Boys Brigade and The Rochester Diocesan Society Board. The Boys 	<ol style="list-style-type: none"> Noted. Residential development is proposed at the Backland car repair site (6.11.2) which has the potential to provide natural surveillance to the rear of Christ Church and the potential new facilities. It will be important to work with the landowners. It is recognised that in order to implement the proposals an element of commercial development on the site may be appropriate to act as enabling development. Suggested change – add additional text to the Christ Church text reflecting these points, and emphasising the importance of ensuring the natural surveillance to the rear of the church.

	Brigade building has only recently been developed and therefore should not be redeveloped.	
Christ Church Bexleyheath	<ol style="list-style-type: none"> 1. Do not support a café at the front of the church, a path to the east or youth facilities to rear: this would exacerbate existing problems with vandalism etc. 2. The new community hub would involve demolishing the church halls and lose income for the church. Do not support. 3. Reluctant to lose car parking. 4. The area around the church is used for fetes and open air services therefore making it into a town park would be problematic. 	<ol style="list-style-type: none"> 1. Noted. See response to the Church of England above. 2. Noted. It is expected that any facilities lost could be re-provided on-site and phasing introduced which safeguarded income streams. Details would be subject to discussions with landowners. 3. Noted. Suggested change – text added to state that car parking for the church and existing facilities will need to be provided, this should be discussed with the relevant landowners. 4. Noted. Detailed discussions with Christ Church about this are recommended. Suggested change - these requirements will be added to the text.
Boys Brigade	<ol style="list-style-type: none"> 1. The current Boys Brigade facilities are purpose built and 22 years old. They include facilities for sport, band and drill and it is not thought that these could be accommodated in the envisaged community hub. 	<ol style="list-style-type: none"> 1. Noted. Detailed discussions about the facilities required to be replaced are recommended. Suggested change - reference to these facilities will be added to the text.
Albion Residents Association	<ol style="list-style-type: none"> 1. Need innovation to address the existing problems in the town centre. Upmarket needs should be identified and then these should be addressed in the town centre. Propose that the Council should make a bulk CPO of all the Broadway properties on the southern side, west of the pedestrianised area then appoint a London firm familiar with Mayfair and Belgravia and get three properties redesigned, and then marketed to West End firms due to renew their leases at a much reduced price. 2. Propose that the Council demolish Albion Road and replace it with the 1982 GLC preferred alignment which will adjoin Arnsberg Way to form an orbital route using Royal Oak Road joining Arnsberg Way to Albion Road. 	<ol style="list-style-type: none"> 1. Noted. The aims of the framework are to provide a high quality environment to attract different high quality retailers to the town centre. There will be opportunities as part of new developments to secure new retailers to the town centre. No changes recommended. 2. Noted. The re-arranging of the roads in this fashion would be a very costly exercise for little gain, and is unlikely to get any funding. The framework proposals seek to change the feel of Albion Road by making it more attractive and pedestrian friendly. The proposals also involve building on the Oaklands Road car parking site to assist in animating the area, and there is potential to include new facilities and shops as part of this development as well as some replacement car parking. No changes recommended.
David Evennett MP	<ol style="list-style-type: none"> 1. Concern expressed about the idea of increasing the number of licensed premises in the town centre and later opening of cafés and bars as this could increase antisocial behaviour in the evening. 2. Request detailed consideration on the changing of 	<ol style="list-style-type: none"> 1. Additional cafés and restaurants could encourage more families to use the town centre in the evening and would ensure a more diverse usage of the centre. No change recommended. 2. Further transport studies are being undertaken and it is recommended that LBB consider the detailed arrangements for any

	any pedestrian crossings and safety rails at junctions, as they are important safety features.	changes as part of this work. No further changes recommended.
Local Resident (Freta Road)	<ol style="list-style-type: none"> 1. New water feature would present a slip hazard. 2. Good suggestions for the Christ Church area apart from the possible unwelcome infringement on Church owned land. The Park adjoining the church land requires more visible and open access and to make it less secluded, and a greater community function at the rear of the church would help with this. 3. Oaklands Road car park is essential if café culture is to be encouraged as the NCP car park is too far away from many venues at the western end. Mixed use redevelopment of the car park is inappropriate. 4. The Albion Surgery should stay at this current location to serve the community. 5. Replacing the roundabout with a signalised junction would cause unnecessary obstruction to traffic movement. 	<ol style="list-style-type: none"> 1. New water features such as this have been successfully placed in a number of town centre locations across the country, such as Manchester Piccadilly Gardens, Sheffield Peace Gardens, and in Kings Road in London with careful design these are popular and safe features. No change recommended. 2. Noted. 3. The retention of an element of public car parking at the Oaklands Road site is considered to be an important factor in retaining trade at the western end of the centre. Suggested change - this requirement should be added to the text. 4. Noted. The text already requires the re-provision of this facility. No change recommended. 5. Before the introduction of any changes to the road layout a detailed traffic analysis should be undertaken to ensure that the proposals would not negatively impact on the flow of traffic through the town centre and that an appropriate capacity is maintained. No change recommended.
Local Resident (Warren Close)	<ol style="list-style-type: none"> 1. New water feature would present a slip hazard. 2. Oaklands Road car park is essential if café culture is to be encouraged as the NCP car park is too far away from many venues at the western end. Mixed use redevelopment of the car park is inappropriate. 	<ol style="list-style-type: none"> 1. The fountain design shown is for illustrative purposes only but such designs have been used successfully in a number of town centre locations. Suggested change clarify fountain design is illustrative only. 2. The retention of an element of public car parking at the Oaklands Road site is considered to be an important factor in retaining trade at the western end of the centre. Suggested change - this requirement should be added to the text.