

TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

LAND AT RINGERS ROAD, BROMLEY

For Ringers Road Properties Ltd

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ETLA

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1.0 EXECUTIVE SUMMARY

1.1 A Townscape and Visual Impact Assessment (TVIA) has been undertaken to inform the iterative design process for the redevelopment of land at Ringers Road ('the Site') and to predict the likely townscape and visual effects from the Proposed Development.

1.2 The TVIA has been undertaken by Chartered Landscape Architects with extensive experience in tall building assessments and in accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. The TVIA has included desk-based reviews of published townscape studies, relevant planning policies and guidance, discussions with the London Borough of Bromley to agree the assessment scope and extensive fieldwork across Bromley.

1.3 In townscape terms, the TVIA concludes that the existing buildings within the Site are of limited architectural quality. The Site is neither covered by any statutory townscape or heritage designations nor is it within a planning policy '*area of residential character*', '*major skyline ridges*' or a '*landmark*'. As a result, the TVIA concludes that the Site neither contribute positively to the townscape character and the Site's position within the townscape, nor its location between the High Street, parts of Bromley Town Centre Conservation Area and Church House Gardens.

1.4 In visual terms (people's views), the existing buildings within the Site are visible at close range from along Ringers Road, Ravensbourne Road, Ethelbert Road and Ethelbert Close. The existing buildings within the Site are seen as part of the varied building style which extends from the High Street to Ravensbourne Road. In mid-range views, particularly to the west of Bromley town centre, the more undulating pattern of landform enables a greater visibility of buildings across the town centre. The composition of these views is of a consistent scale of residential properties, with taller buildings in the town centre across the background of the view. These taller buildings include the Mall Tower, the Churchill Theatre and the Crest Building, which is on Ringers Road). These taller buildings extend above the skyline, such that views towards the Site are already characterised by taller buildings extending above residential properties. In long range views, including from the elevated terraces of Crystal Palace Park the upper parts of the Churchill Theatre, the Crest Building and St Marks Tower are also visible, forming a small part of a wider panoramic view. Views towards the Site are also seen in this context.

1.5 From the townscape and visual analysis, it is considered appropriate that the Bromley Town Centre Area Acton Plan identifies the Site within an '*opportunity area*' for redevelopment a '*possible location for a tall building*' is identified adjacent to the Site.

1.6 As part of the iterative design process, the TVIA has identified that the Proposed Development should be a landmark building to reflect its position within the town centre and opposite the Crest Building. Tall buildings within the Site also relate to potential development across the Churchill Quarter, to the immediate north of the Site.

1.7 The TVIA analysis also concluded that the architectural detailing to the Proposed Development should include a varied treatment to the building facades and ensure Block A and Block B have their own identity, whilst forming part of a holistic arrangement of high quality buildings.

1.8 The Proposed Development would replace the existing buildings within the Site and introduce residential led land uses and a new public realm. Block A and Block B would be taller than the existing buildings in the Site and of a higher architectural quality, resulting in a high change to the local townscape character.

1.9 The height of the Proposed Development would form a consolidated and co-ordinated mass of buildings with the Crest Building on the opposite side of Ringers Road. Block B would step down in scale from Block A, such that the lower height of the Proposed Development would face the Conservation Area to the north of the Site. The stepped relationship in the height between Block A and Block B, along with the architectural details, would provide interest and variety to the skyline. Overall, both Block A and Block B would be seen as one of a number of taller buildings across Bromley's skyline, integrating with the Churchill Theatre, the Mall Tower, the Crest Building, Perigon Heights and St. Marks Tower in views from the wider townscape.

1.10 In townscape and visual terms the Proposed Development is therefore predicted to result in a range of beneficial townscape and visual effects. The Proposed Development responds positively to Bromley's policy requirements and accords with the vision of the Bromley Town Centre Area Action Plan to enhance Bromley town centre.

2.0 INTRODUCTION

2.1 ETLA were appointed by Ringers Road Properties Ltd to undertake a Townscape and Visual Impact Assessment (TVIA) of at land Ringers Road ('the Site') in respect of the 'Proposed Development':

“Demolition of existing buildings and construction of a mixed use development comprising residential units, ancillary residents’ facilities (including co-working space) and commercial floor space (Use Class E) across two blocks, along with associated hard and soft landscaping, amenity spaces, cycle and refuse storage.”

2.2 The Site is within an identified 'Opportunity Area' as part of the Bromley Town Centre Area Action Plan (BTCAAP) Development Zone 2, which is designated for future residential and retail led development to the west of Bromley High Street, as part of the future enhancement of Bromley town centre.

2.3 The Site is also adjacent to an identified BTCAAP 'possible location for taller building', for which the supporting BTCAAP policy requires a visual assessment in relation to key views from across Bromley. In response to the BTCAAP, this TVIA therefore sets out the likely townscape and visual effects resulting from the Proposed Development, whereby:

- Townscape effects relate to changes to the townscape as a resource, (i.e. changes to physical elements/features of the townscape and/or the aesthetic, perceptual and experiential characteristics that make different townscapes distinctive); and
- Visual effects relate to changes to existing views from identified visual receptors ('people'), from the loss or addition of features within their view, due to the Proposed Development.

2.4 The TVIA has been undertaken by Chartered Landscape Architects, with extensive experience in TVIA and tall building assessments.

2.5 The TVIA methodology, study area, location of viewpoints has been presented to the London Borough of Bromley (LBoB) via email¹ with their requested views included within the assessment.

2.6 The TVIA should be read in combination with the TVIA appendices, plans and photographs, the drawings for determination and the Design and Access Statement.

3.0 TVIA METHODOLOGY AND CONSULTATION

TVIA METHODOLOGY

3.1 The TVIA methodology is outlined in full in **Appendix 1: TVIA Methodology** and is in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013) and the Landscape Institute's Technical Guidance Note on Landscape Value (2021)². Reference is also made to Historic England's Consultation Draft on Tall Building Advice (2020)³ and the Landscape Institute's Technical Information Note 05/2017 on Townscape Character Assessment (2018)⁴.

3.2 The TVIA has informed the iterative design process through an understanding of the existing townscape and visual context of the Site to inform the massing, scale and height of the Proposed Development.

3.3 The TVIA assesses the Proposed Development as illustrated on the drawings for determination at year 1 of operation, assuming winter conditions, whereby deciduous vegetation is not in leaf, such that there is the potential for a greater degree of visibility of the Proposed Development in comparison to summer conditions.

Townscape Assessment Methodology Summary

3.4 To identify the likely effects of the Proposed Development, the sensitivity of a townscape receptor is established by an assessment of value (the relative value attached to a townscape by society) and susceptibility (the ability of the receptor to accommodate change). Townscape sensitivity is assessed as high, medium, or low.

3.5 The change (magnitude of impact) resulting from the Proposed Development is informed by judgements about the size, extent, duration and reversibility of the Proposed Development. The townscape change is assessed as high, moderate, low, negligible or neutral.

3.6 The relationship between the townscape sensitivity and townscape change establishes the effect of the Proposed Development. The townscape effect ranges between major to no change, beneficial or adverse.

Visual Assessment Methodology Summary

3.7 The visual effects are determined by identifying a range of people's views, e.g. residents or pedestrians ('visual receptors'). The visual assessment assesses the sensitivity of the visual receptor and the visual change (magnitude of impact) of the Proposed Development.

¹ Emails from ETLA to the London Borough of Bromley 01/12/2020 and 05/01/2021

² Landscape Institute, Technical Guidance Note 02/21: Assessing landscape value outside national designations, 2021, <https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2021/05/tgn-02-21-assessing-landscape-value-outside-national-designations.pdf>

³ Historic England, <https://historicengland.org.uk/whats-new/news/tall-buildings-advice-consultation/>

⁴ Landscape Institute, Townscape Character Assessment, Technical Information Note 05/2017, revised April 2018, <https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2018/04/tin-05-2017-townscape.pdf>

3.8 The sensitivity of the visual receptors is assessed by considering their value, e.g. whether their view is a designated view or one which is identified in guide books and tourist information. The assessment considers the receptors susceptibility, i.e. their occupation, such as whether they are a resident with a fixed view or motorist with a transient view. Visual sensitivity is assessed as high, medium or low.

3.9 The visual change is assessed with reference to the scale of change in the view; the distance of the Proposed Development in relation to the receptor and the extent of the view over which the changes would be visible. The visual change is assessed as high, moderate, low, negligible or neutral.

3.10 The relationship between the visual sensitivity and visual change establishes a visual effect which ranges between major to no change, beneficial or adverse.

Future Baseline Assessment

3.11 The TVIA also undertakes an assessment of the Proposed Development in relation to a future baseline, i.e. assuming that the BTCAAP Development Zones, specifically the Churchill Quarter, has been implemented.

3.12 The TVIA future baseline methodology is the same as set out above and uses the same townscape and visual receptors.

3.13 The difference is that the future baseline assessment is assessing the change and effect of the Proposed Development in relation to a 'different' townscape that exists currently, as it consists of the Churchill Quarter.

3.14 As an example, the future baseline assessment may result in views towards the Proposed Development being screened by the Churchill Quarter and therefore the Proposed Development would not be visible, such that there would be no change to the view. Similarly, the Proposed Development would be within a townscape of taller buildings.

CONSULTATION WITH THE LONDON BOROUGH OF BROMLEY (LBOB)

3.15 Table 2.1 sets out the consultation and relevant responses to the consultation with the LBoB during the preparation of the TVIA.

Table 3-1: TVIA Consultation Summary

ETLA Scoping Report (01/12/2020)	LBoB Response (17/12/2020)	ETLA Consultation Response (05/01/2021)
A 4 kilometre (km) study area was proposed for the assessment.	Longer range views beyond 4km were advised.	The visual study area has been increased to 6.7km.

ETLA Scoping Report (01/12/2020)	LBoB Response (17/12/2020)	ETLA Consultation Response (05/01/2021)
A range of representative views were proposed for the visual assessment.	Locations further afield to the east/south-east and north-west of the site were advised, including reference to the junction of Chesham Avenue and Oxhath Close.	Locations further afield to the east, south-east and north-west of the Site have been included as viewpoints 34.
	The potential need to assess the impact on any of the protected views of local importance, landmarks or Major skyline ridges, listed in policy 48 of the Bromley Local Plan should not be scoped out.	These identified views have not been scoped out of the assessment, with a view included from the major skyline ridges of Keston Ridge (viewpoint 35) and Crystal Palace (viewpoint) included in the assessment.
	A view from Statutory listed Bromley College, London Road, Bromley should be included.	This location is included in the visual assessment (viewpoint 18).
	A view from St Peter and St Paul Church, Church Rd should be included.	This location is included in the visual assessment (viewpoint 14).
A view from Square/High St/Church Rd, Bromley where there are a number of stat listed buildings should be included.	This location is included in the visual assessment (viewpoint 13).	

3.16 The iterative process has also included a presentation of TVIA matters to the Design South East Panel⁵. The relevant matters from that presentation and how these have been responded to are set out in Table 3-2:

Table 3-2: Design South East Panel Review

Design South East Review Panel Key Recommendations	TVIA Response
1. Reconsider the height and scale whilst providing a narrative for a tall residential building	The building height of Block A has been lowered from 19 storeys (125.79m AOD) to ground plus 13 storeys (103.82m).
2. Study the topography and residential context further so that the sloped site assists with a sensitive transition from commercial high street uses towards residential uses	The topography has been studied as part of the iterative process and was presented as such at the review. The TVIA includes a review of the topography with supporting plans.

3.17 The visual assessment also includes recreational users at Queensmead (viewpoint 17), in response to comments from the Civic Society.

4.0 SITE CONTEXT

THE SITE

4.1 With reference to **Figure 1: Site Context Plan**, the Site comprises residential and commercial land uses within Bromley Town Centre, situated between Ethelbert Road and Ringers Road, with:

- Nos 2-4 Ringers Road, which front Ringers Road and Ethelbert Road ; and

⁵ Design Southeast presentation and review, 15th April 2021.

- No 5 Ethelbert Road.

4.2 The Site is bound by:

- Ethelbert Road, to the north, with residential land uses and Church House Gardens beyond;
- The Salvation Army Church, TK Maxx and Bromley High Street to the east;
- Ringers Road, to the south, with residential and commercial land uses beyond; and
- Residential and commercial land uses along Ethelbert Road and Ringers Road to the west.

4.3 The Site is 70 metres (m) to the south-west of junction between the vehicular and pedestrianised parts of the High Street, the Glade shopping centre and Bromley Town Centre Conservation Area. The Site is also 110m to the north-east of one of the entrances to Church House Gardens. The Site is therefore located in proximity to key interchanges, locations and public routes within Bromley Town Centre.

4.4 Nos 2-4 Ringers Road consists of a red brick commercial building adjacent to Ethelbert Road, with alternating bands of windows and double height loading bay doors. The building equates to 3 storeys in height and has a flat roof. Adjacent to Ringers Road, the building is single storey in height and is a restaurant. The façade consists of several rectangular windows and entrance doors, but there is no other articulation to the façade.

4.5 No 5 Ethelbert Road consists of a two storey plus lower ground floor residential building. The building façade consists of a light brown/yellow brick and a symmetrical arrangement of bay windows extending from the façade at lower ground and first storey. These bay windows, and the windows across the second floor, are rendered white. The existing buildings within the Site are considered to be of limited architectural quality. Nos 2-4 Ringers Road do not contribute positively to the townscape character and the Site's position within the townscape, whilst the proportions, materials and scale of No 5 Ethelbert Road have some architectural value and scenic quality along Ethelbert Road.

STUDY AREA

4.6 The purpose of the townscape and visual study area is to identify the area in which change and effects may occur to the identified townscape and visual receptors. Whilst the Proposed Development may be perceived beyond the study area, the combination of distance, intervening vegetation, land uses and landform are considered to negate the likelihood for townscape and visual effects.

4.7 The TVIA study area has been determined through desk-based review, fieldwork and professional judgement. The desk-based review has included computer generated Zone of Theoretical Visibility (ZTV) mapping, along with a review of landform and vegetation.

4.8 The fieldwork has covered the extent of the ZTV to ascertain the 'reality on the ground' in terms of the extent of screening to views as a result of existing buildings and vegetation.

4.9 With reference to **Figure L01: Site Context Plan**, the townscape study area extends up to 0.75 kilometres (km) from the Site, to cover:

- Recreational land uses across Church House Gardens, Martin's Hill and Queensmead, retail, leisure and residential land uses across Bromley town centre to the north of the Site;
- Retail and commercial land uses within the Bromley High Street, civic land uses at the Council Offices and residential land uses across Widmore, to the east of the Site;
- Retail and commercial land uses across Bromley town centre, including Bromley South railway station and recreational land uses across Bromley Common to the south of the Site; and
- Residential land uses across Shortlands and Park Langley to the west of the Site.

4.10 With reference to **Figure 1: Site Context Plan**, the visual study area extends up to 6.7km from the Site, to cover:

- Elevated land across Martin's Hill and lower lying parts of the Ravensbourne Valley (including Queensmead) to the north of the Site;
- Low-lying residential areas across Widmore, to the east of the Site;
- Elevated land across Bromley Common and Keston to the south of the Site; and
- Elevated land across Crystal Palace Park to the west of the Site.

LANDFORM AND HYDROLOGY

4.11 With reference to **Figure L02: Topography Plan**, the landform across the study area is undulating due to several valley systems and associated watercourses, resulting in a complex pattern of landform, defined by several ridgelines and lower lying valleys.

4.12 The principal valley system is the Ravensbourne Valley, which extends in a broadly south to north-west orientation across the central part of the study area.

4.13 The landform is elevated at Keston, in the southern part of the study area, at approximately 130m Above Ordnance Datum (AOD). This elevated land forms the upper slopes of the Ravensbourne Valley.

4.14 From Keston, the landform falls consistently northwards, across Mason's Hill, Bromley Common and Norman Park (situated between 95m AOD and 45m AOD), to the junctions of the A21 and B228, at the southern part of Bromley town centre. The Ravens Bourne also flows across this part of the study area, although it is a small watercourse, culminating at Rookery Lake, within Bromley Common.

4.15 From the southern part of Bromley town centre, the Ravensbourne Valley extends north-west, at approximately 35m AOD, and demarcated by the alignment of the railway line, across Shortlands and Shortlands Golf Club. Several ponds and a narrow unnamed watercourse flow across this part of the

valley floor. The valley floor also extends eastwards, again demarcated by the alignment of the railway line, across Widmore.

- 4.16 From Bromley South station, the landform rises northwards, along the alignment of the High Street, to form a plateau in the northern part of the town centre at approximately 65m AOD. However, the western part of Bromley town centre, between the railway line and the High Street, consists of a more varied pattern of landform, as part of the north side of the Ravensbourne Valley. The landform rises steeply between 40m AOD and 65m AOD across the grounds of Church House Gardens and upper parts of St. Martin's Hill.
- 4.17 To the west of Bromley town centre the landform is undulating, remaining low lying across Shortlands, before undulating across a series of low hills which range between 50m AOD and 60m AOD to culminate at a ridgeline at Park Langley, approximately 2.2km to the west of Bromley. From this ridgeline, the landform falls and remains generally low lying, until rising across Penge and Crystal Palace Park, at 95m AOD, at the western edge of the study area.
- 4.18 In closer proximity to the Site, Ravensbourne Road is situated at approximately 45m AOD. The landform rises consistently eastwards, across Ethelbert Road and Ringers Road, to the High Street at approximately 62m AOD. The Site is situated in proximity to the High Street, at approximately 60m AOD, on the more elevated part of Ringers Road.
- 4.19 To the south of the railway line, the landform is undulating and also rising, forming the southern side of the Ravensbourne Valley, with localised hills up to 65m AOD. The landform continues to rise across Shortlands to a ridgeline defined by the alignment of the B251 (Hayes Lane), between 70m AOD and 75m AOD. To the west of this ridgeline, the landform falls towards Park Langley and Langley Park, which are situated between 50m AOD and 55m AOD.

LAND USE AND SETTLEMENT PATTERN

- 4.20 Land uses across the study area consists of extensive areas of residential suburbs, which form a dense amalgamated settlement pattern.
- 4.21 Bromley town centre is the main retail and commercial focus of this assessment, although these land uses extend across all of the study area at a variety of scales.
- 4.22 Numerous open spaces extend across the study area, including several country parks, commons and more formal recreation via golf course. The Ravensbourne Valley forms part of these open spaces, extending from the south of Bromley town centre, across Church House Gardens and to the north-west of Bromley, via Shortlands golf course.
- 4.23 Land uses at Crystal Palace Park include the national sports centre, such that there a high number of visitors and recreational value to this part of the study area.

VEGETATION PATTERNS

- 4.24 The vegetation patterns across the study area are varied due to the contrast between areas of common and woodland and town centres with extensive areas of buildings and associated road and infrastructure networks.
- 4.25 There is mature woodland across Hayes Common and bordering Keston in the southern part of the study area. This woodland extends northwards across Bromley Common, via several woodlands, including Barnet Wood, Mazzards Wood, Brook Wood and Scrogginhall Wood which are adjacent to the Ravens Bourne. Norman Park is predominantly open in character due to the sports pitches and playing fields, although there are trees bordering car-parking areas.
- 4.26 To the north of the Site, there are mature trees within Church House Gardens, with woodland extending to border Ethelbert Road, as part of a tract of vegetation from Martin's Hill, although not continuous due to the intervening road networks.
- 4.27 Other vegetated parts of the town centre include Queens Gardens, approximately 300m to the north-east of the Site and the grounds of Council Offices, approximately 400m to the east of the Site.
- 4.28 The number of street trees across Bromley High Street is low, with no trees directly along Ethelbert Road or Ringer's Road. However, there are mature trees within the grounds of Chadwick Meeting House, approximately 80m to the south-west of the Site and dividing the residential gardens to the west of the Site. As noted above, there are mature trees to the immediate north of Ethelbert Road, within the grounds of Church House Gardens.
- 4.29 There are mature trees across the residential areas to the west and east of Bromley town centre. This results in a generally well vegetated residential townscape. The extent of tree planting generally increases away from the town centre due to the wider street pattern and opportunities for street trees.
- 4.30 Other notable tracts of vegetation across the study area are adjacent to the railway corridors and across the golf courses.

4.31 With reference to the London Borough of Bromley's Protected Tree Map⁶, the Site is not covered by any Tree Preservation Orders (TPO), nor ancient woodland.

MOVEMENT AND CONNECTIVITY

4.32 The Site is not crossed by any Public Rights of Way (PRoW).

4.33 With reference to **Figure 1: Site Context Plan** and the LBoB's on-line PRoW mapping⁷, PRoW in proximity to the Site include

- PRoW (footpath) 069A, which crosses the elevated parts of Martin's Hill, approximately 400m to the north-west of the Site;
- PRoW (footpath) 074, which extends from the junction of Ravensbourne Road and Ringers Road to Winchester Road, to the south of the railway line. The PRoW crosses the railway line via a raised pedestrian bridge, which is one of the 'key view' locations identified within the BTCAAP and is included within the visual assessment as viewpoint 8;
- PRoW (byway) 79, across Langley Park in the western part of the study area; and
- PRoW (footpath) 131 and 135, which cross Bromley Common, in the southern part of the study area.

4.34 The High Street is pedestrianised to the north-east of the Site, from the junction of Ethelbert Road and Elmfield Road, northwards to the northern part of the town centre.

4.35 There are several formal and informal path networks across Church House Gardens, with access from the western end of Ethelbert Road. The routes across the gardens enable access to Glassmill Lane, and across Martin's Hill, as well as to the Churchill Theatre.

4.36 Bromley Common in the southern part of the study area is crossed by many informal paths, as well as paved routes to enable cycling. There are also many informal routes across Hayes Common, including part of the London Loop, which also extends across residential areas to the east of Bromley town centre.

4.37 The promoted routes of the Capital Ring and Green Chain Walk cross Crystal Palace Park.

HISTORICAL DEVELOPMENT

4.38 Bromley is a former market town which expanded during the medieval period, with more notable growth in the population during the 17th and 18th centuries, aided by Bromley being located along the coaching route to Hastings.

4.39 The High Street is the historic main route through the town centre, which extends to the north and south of Market Square. Rocque's Map of 1761 illustrates Bromley as a linear settlement pattern, adjacent to the High Street, surrounded by market gardens and fields and with Bromley College at the northern part of the town.

4.40 In the 18th century Bromley's trade and population decreased following the loss of patronage from the Bishop of Rochester. The arrival of the railways in the mid-19th century reversed this decline, with new development around the town centre and the establishment of residential suburbs, during which time the Site formed part of the fields to the west of the High Street.

4.41 By 1896 Bromley's settlement pattern had notably increased, with residential land uses around Bromley South station. The Site was also developed with residential land uses between Ringers Road and Ethelbert Road, set within comparatively large building plots, forming 'villa' style developments.

4.42 Residential growth also occurred again in the inter war periods (1920s to 1940s), particular to the east and west of the High Street, with the Site remaining an area of 'villa' style properties.

4.43 Post 1945 extensive rebuilding occurred across Bromley, such that by 1960 residential land uses were present opposite Ethelbert Road and the density of development across the Site had increased.

4.44 The Churchill Theatre and Library opened in 1977 and development continued, particularly around Bromley South station, with the Site remaining part of the more densely developed part of the townscape either side of the High Street.

4.45 In the 1990s the town centre was reconfigured, based upon the Glades retail centre (which opened in 1991) and the pedestrianisation of the northern part of the High Street. This redevelopment removed the finer grain pattern of properties to the east of the High Street.

4.46 Recent development within the town centre has occurred around Bromley South, via St. Marks Tower and Perigon Heights. These two buildings have introduced tall buildings within the townscape, demarcating key transport interchanges (Bromley South railway station and the junction of the A21 with the B228).

DESIGNATIONS

4.47 With reference to **Figure L01: Site Context Plan**, the Site is not covered by any statutory townscape designations.

⁶ London Borough of Bromley, Protected Tree Map, on-line, https://www.bromley.gov.uk/homepage/211/tree_preservation_orders_map

⁷ London Borough of Bromley, on-line mapping, https://www.bromley.gov.uk/homepage/242/public_rights_of_way_in_bromley_-_location_map

4.48 With reference to the Bromley Local Plan⁸, the Site is not within an Area of Residential Character nor is it located across the '*major skyline ridges*' and nor is it identified as a '*landmark*'.

4.49 With reference to the LBoB on-line mapping⁹, '*views of local importance*' are identified across the Borough. The BTCAAP (reviewed in the following policy section) identifies several 'key views' across the townscape. These matters are analysed in the visual appraisal section of the TVIA.

4.50 The Bromley Local Plan identifies the Church Theatre and Library as 'local landmarks'; these buildings are 160m to the north of the Site.

4.51 The Site is not within a Conservation Area (CA). The Bromley Town Centre CA is 55m to the north-east of the Site, at the junction of Elmfield Road and Ethelbert Road.

4.52 In July 2021 the Council Executive agreed the new Shortlands CA, which extends north-west from Martin's Hill and across Shortlands Golf Course. The supporting Historic Area Assessment (2020)¹⁰ includes an analysis of 'gaps and views', noting the key aspects of views are wooded hillsides, pumping stations and the Church of St Peter and St Paul, on Martin's Hill. None of the identified views are towards the Site.

4.53 The Council Executive also agreed an extension to the Bromley Town Centre CA, to cover Queens Mead and across the pedestrian bridge to Valley Road.

4.54 With reference to **Figure L01: Site Context Plan**, listed buildings within the study area include:

- Bromley College (Grade I) is 645m to the north of the Site, to the east of London Road. The building is a 17th collegiate residence arranged around two brick courtyards which include mature trees;
- The Church of St. Peter and St. Paul (Grade II) is 315m to the north of the Site. The church was rebuilt in the 19th century in a Victorian Gothic style, but retained the fourteenth century tower and font. The church is set within a churchyard, which contains several mature trees and is bordered by a low wall to the north and fencing to the east and south, beyond which are the grounds of Church House Gardens;
- The Bromley War Memorial (Grade II*) is 400m to the north-west of the Site, in an elevated position within Martin's Hill recreation ground. The Memorial consists of an obelisk with bronze figures;
- The iron gates to Queen Gardens (Grade II) 385m to the east of the Site, which are a notable part of the gardens and a stated good example of ironwork within the listing;

- The Old Palace (Grade II), 470m to the north-east of the Site, which while re-built is of civic importance and an area of development within the town centre since the 12th century; and
- 19 Glassmill Lane (Grade II), 345m to the north-west of the Site, which consists of two 18th century cottages.

4.55 Locally listed buildings derived from the BTCAAP are:

- Aberdeen Buildings, 95-109 High Street, which consist of a row of 8 terraced buildings, 3 storeys in height, 140m to the north-east of the Site;
- 157 High Street, 345m to the north of the Site;
- St Peter and St Paul War Memorial, 357m to the north of the Site;
- St. Martin's Hill Lodge, 360m to the north-west of the Site; and
- St. Marks Church, a late Victorian church which is notable for the height of its tower, which forms a local landmark in the southern part of the town centre, 360m to the south of the Site.

4.56 The 'Buildings of Townscape Merit' derived from the BTCAAP are:

- The Churchill Theatre, a geometric building which is grey in colour tone and prominent building on Bromley's skyline, 165m to the north of the Site;
- Ravensfell House, a 19th century red and black Tudor style building, 125m to the north of the Site;
- 84 High Street, a two storey red brick and stone building, 65m to the north of the Site;
- 44 High Street, a concrete and steel building modernist building, equating to six storeys in height, 115m to the south of the Site; and
- 42 High Street, a stucco rendered three to four storeys in height, with arched windows and a pitched roof, 125m to the south of the Site.

FUTURE BASELINE

4.57 Several planning applications have been submitted for locations in close proximity to the Site demonstrating the evolving character of the High Street. Those relevant to the future baseline assessment are summarised below.

⁸ London Borough of Bromley, Local Plan, adopted 2019, https://www.bromley.gov.uk/info/1004/planning_policy/1263/the_bromley_local_plan

⁹ London Borough of Bromley, https://www.bromley.gov.uk/downloads/file/5102/local_plan_map_views_of_local_importance

¹⁰ https://www.bromley.gov.uk/downloads/file/6440/proposed_shortlands_village_conservation_area_report

Bromley Town Centre Masterplan

- 4.58 The Bromley Masterplan (the Stitch masterplan) proposes a new mixed use neighbourhood centre within Bromley Town Centre, extending to the south of the High Street, between the Churchill Theatre and Bromley South railway station.
- 4.59 With reference to the following illustrative section, the Site is situated within 'Development Zone 2' which includes new buildings up to 14 storeys in height.

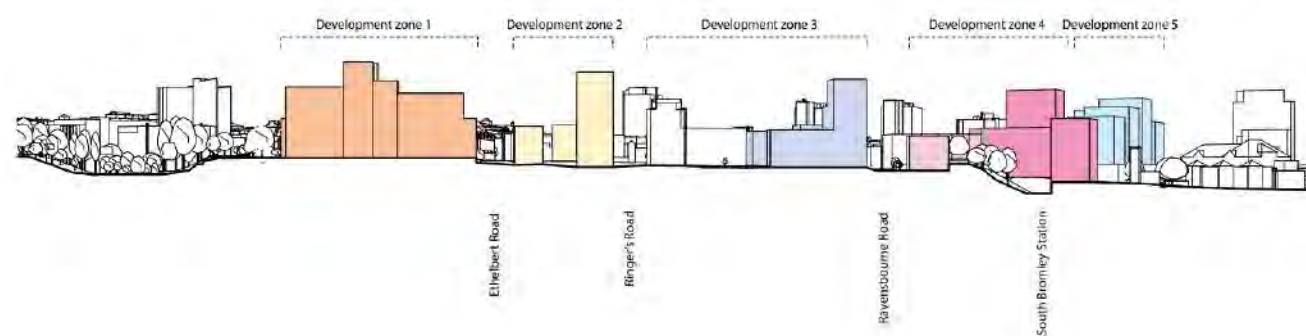


Image 1: Extract from the Stitch Masterplan

- 4.60 The more relevant part of the masterplan in relation to the Site is the Churchill Quarter (Planning Application Ref: 18/02181/FULL1). This is located opposite the Site, extending from Ethelbert Road to the Churchill Theatre (red line location on Image 2).



Image 2: The Churchill Quarter part of the Bromley Masterplan demarcated by the red line, with the Site to the immediate right.

- 4.61 The Churchill Quarter scheme consists of the demolition of 1-40 Ethelbert Close, 2 Ethelbert Road, 102-108 High Street and miscellaneous buildings to the north of Ethelbert Close. Redevelopment will consist of a mixed use scheme of 407 residential units up to 16 storeys in height as illustrated by Image 3.



Image 3: Rendered illustration of the Churchill Quarter massing, extending above the Churchill Theatre via staggered arrangement of buildings. The Site (ground) is located to the right of the Crest Building (the red brick building with the angled roof in the background, on the left of the image)

- 4.62 A decision is still pending, but the application has extended beyond the determination period. With the implementation of the masterplan, the context to the Site will be fundamentally altered, with taller buildings across Bromley town centre.

5.0 PUBLISHED CHARACTER ASSESSMENTS AND RELATED STUDIES

- 5.1 The Site and study area are covered by several published landscape and townscape character assessments, which support the planning policy evidence base and provide guidance on the management of future change. The relevant matters of these studies are set out below.

National: Natural England's, National Character Area (NCA) 113: North Kent Plain¹¹

- 5.2 The Site is within NCA 113, which covers a large area, extending between Bromley, Canterbury and Ramsgate. The published states that NCA 113 is an area which has:

¹¹ Natural England, National Character Area 113, <http://publications.naturalengland.org.uk/publication/2900242>

“a strong urban influence, with several built-up areas...with significant development around London.”

Borough: London Borough of Bromley Town Centre Area Action Plan (BTCAAP), 2010¹²

5.3 Relevant Statements of Environmental Opportunity (SEO) are:

- protecting and enhancing the strong character and heritage of the urban areas, including planning for the creation of significant new areas of green space and green corridors to provide a framework for new and existing development in urban areas (SEO 4).

Historic England, Consultation on Tall Building Advice Note

5.4 The consultation Advice Note updates previous 2007 and 2015 guidance by English Heritage and CABE and is referenced by the London Borough of Bromley Local Plan Policy 48: Tall Buildings.

5.5 The Advice Note reiterates that ‘high quality’ scheme will have a ‘positive’ relationship with:

- Topography;
- Character of Place;
- Heritage assets and their setting;
- Height and scale of development (immediate, intermediate and town- or city-wide);
- Urban grain and streetscape;
- Open spaces;
- Rivers and waterways;
- Important views including prospects and panoramas; and
- The impact on the skyline.

5.6 The Advice Note states that a ‘successful application’ and high quality architecture will consider the buildings:

- Scale;
- Form and massing;
- Proportion and silhouette;
- Facing materials;
- Detailed surface design;
- Relationship to other structures;
- Impact on streetscape and near views;
- Impact on cityscape and distant views; and
- Impact on the skyline.

5.7 The BTCAAP identifies the Site as within the ‘Bromley Central Character Area’, which is described by the BTCAAP as:

“The main retail and commercial core focussed around the continuous retail frontage of High Street and the covered Glades Shopping Centre. Queens Garden is an important open space but is poorly integrated with the surrounding town centre. There is a strong concentration of activity and retail uses within Bromley Central but limited activity outside standard retail hours.”

5.8 BTCAAP Appendix 3: Character Area Guidelines¹³ states the ‘key built form consideration’ for the Bromley Central Character Area and Opportunity Site G are:

“Encourage active edges to street frontages and discourage internalisation of activity and public spaces (i.e. active edges should always front onto public streets or spaces).

Ensure new development responds to the surrounding heritage buildings and the conservation area. Possible locations to consider taller buildings on the western side of the High Street (subject to an assessment of visual impact on the High Street, the conservation area and residential areas to the west.) Building scale needs to be carefully considered especially on the ridgeline.”

5.9 The BTCAAP stated ‘Key Landscape Considerations’ for the Bromley Central Character Area and Opportunity Site G are:

“Create enhanced E-W links to improve through town pedestrian links and to better connect the town to the surrounding landscape assets (e.g. Church House Gardens). A major new square is suggested to the south of the Churchill Tower to act as a forecourt to theatre and to create a strong link between the High Street and Churchill Gardens. Preserve and enhance the good quality streetscape of High Street. Better integration of Queens Garden to the broader town centre.”

5.10 Additional stated development principles for Opportunity Site G are:

- “Sensitive approach to Conservation Area;
- Need for a comprehensive approach to development;
- Agreed phasing plan;
- Variety of architectural style;
- Development to provide permeability and create a sensitive active frontage onto Church House and Library Gardens and High Street;
- Includes a Department Store Sensitive integration of residential uses;
- Potential for taller buildings;
- Enhanced gateway to the town centre from the south;
- High quality public realm/civic focus Opportunities for provision of Public art.”

5.11 The BTCAAP identifies the following character areas across the remainder of Bromley:

¹² London Borough of Bromley, Bromley Town Centre Area Action Plan, https://www.bromley.gov.uk/downloads/download/194/bromley_town_centre_area_action_plan

¹³ London Borough of Bromley, Bromley Town Centre Area Action Plan, Appendix 1-4, https://www.bromley.gov.uk/downloads/file/515/btc_appendices_1_to_4

- The Northern Gateway, at the northern edge of the Bromley town centre and covering Bromley North train station, approximately 675m to the north-east of the Site;
- The North Village, covering the northern part of Bromley town centre, extending between the High Street and East Street, approximately 370m to the north of the Site;
- Western Edge, covering parts of Ringers Road, Ethelbert Road and Church House gardens, approximately 20m to the west and extending up to 380m to the north-west of the Site. This area contains extensive open space with Church House and Library Gardens, with a notable perception of the underlying landform via St Martin's Hill;
- The Civic Centre, covering land to the east of Kentish Way, approximately 375m to the east of the Site; and
- Bromley South, covering Bromley railway station and land to the south of the railway line, approximately 200m to the south of the Site. The area is a gateway into Bromley, via the station and key road junction at the A21 Kentish Way.

5.12 The Site is within the BTCAAP boundary and part of Opportunity Site G: West of High Street. The supporting rationale for Site G: West of the High Street includes:

"...Development of the western side of the High Street will improve the appearance of the town centre;

...The site offers the potential for taller buildings subject to environmental and design considerations."

5.13 The Site is adjacent to an identified 'possible location for taller building' site, covering the TK Maxx building. The relevant supporting design principles are set out in BTCAAP Appendix 5¹⁴ are:

- *"Any development on the ridge edge is likely, therefore, to be very prominent particularly in views from the west of the town centre;*
- *Development of site G presents a singular opportunity for improving and enhancing the whole of the west side of the High Street from the Churchill Theatre to the railway line;*
- *Development must endeavour to avoid uniform swathes of large scale external cladding and glass. Different styles, heights, treatments and materials should be used to introduce variety;*
- *There is potential for taller buildings on the site. Because of the potential visual impact of buildings on the ridgeline. However it is important that the scale and massing of any future development is assessed with particular regard to views from residential areas to the west, views from the High Street, views from Church House Gardens and from the proposed new public space in site N. Excessive overshadowing should be avoided where possible."*

5.14 The Site is also adjacent to an area of 'improved pedestrian access' along Ringers Road.

5.15 The Site is not part, nor close too, any 'distinctive building group', which cross the town centre to the north and south of the Site.

The Bromley Town Centre Conservation Area Statement, 2011¹⁵

5.16 The Statement identifies 'key views' across the Conservation Area, but none are towards the Site.

5.17 The two Conservation Area character areas in proximity to the Site are:

Central (Pedestrianised) High Street Character Area

5.18 This is located approximately 70m to the north-east of the Site and is described by the published study as:

"This section of the High Street has a varied built character which is unified by the pedestrianisation of the street. The main pedestrian flows are from north to south whilst there is significant movement west to east from Neuwied Way through the Marks and Spencer store into the Glades shopping centre. Street trees are located at the southern end and street furniture is located along its length. A reproduction milestone is located outside 90 High Street adjacent to Ethelbert Road...;

The view south from the High Street into Market Square is terminated by no. 20-25 Market Square. The view south down the High Street is terminated by nos. 76-82 High Street, a red brick neo-Georgian building, which also terminates the view West down Elmfield Road."

Ravensbourne Valley

5.19 The Ravensbourne Valley is 170m to the north-west of the Site and extends across Church House Gardens and Martins Hill and is described by the published study as:

"The view from Church Road towards Martins Hill is terminated by another Victorian lodge. A row of two storey Victorian cottages and shops are located on the northern side and the character is more varied...;

Martins Hill retains a semi-rural character and is a valued recreational asset to the town...The views out of the conservation area from Martins Hill to the valley below are of the stone buildings of the Grade 2 Listed water works and into Shortlands."

6.0 ETLA TOWNSCAPE APPRAISAL

6.1 To provide more detailed information to the published studies in respect of the townscape character and a more proportionate scale of assessment, the Applicant has undertaken a townscape character appraisal.

¹⁴ London Borough of Bromley, Town Centre Action Plan, https://www.bromley.gov.uk/downloads/file/516/btc_aap_appendices_5_to_7_and_glossary

¹⁵ Supplied to ETLA via email from the London Borough of Bromley

Larger Scale Massing and Tall Buildings within Bromley

6.2 Larger scale massing within the townscape includes:

- the Crest building, consisting of Henry House and William House (up to 11 storeys), on Ringers Road, opposite the Site;
- the Bank of America complex, consisting of three buildings on Elmfield Road;
- St Mark’s Square (19 storeys) and characterised by an angled roof profile to the south of the Site;
- Perigon Heights, a range of tall buildings (7, 11 and 17 storeys) to the south of the Bromley South railway station;
- the Mall tower, to the east of the High Street, rising up from the shopping centre;
- the Glades; and
- the Churchill Theatre, to the north of the Site, with the highest part of the building approximately 40m above ground level, at 102.9m AOD.

ETLA Local Townscape Character Types (LTCT) Areas (LTCA)

6.3 With reference to **Figure L03: Townscape Character Areas** and **Appendix 2**, the following LTCT and LTCA have been identified by the Applicant as part of the fieldwork and using the information from the baseline review.

- LTCT 1: Bromley, covering the townscape study area and consisting of retail, office, residential, recreational and transport land uses. The pattern of the LTCT is defined by a north to south High Street, situated across rising landform with a range of building styles and heights, bordered by a consistent scale of residential properties. The skyline of the LTCT is demarcated by tall buildings at transport interchanges and points of arrival via St Marks Tower and Perigon Heights. The main building material is brick;
- LTCA 1: Residential Town Centre, which covers the residential land uses to the north, west and south of the Site, which extend adjacent to Ravensbourne Road, Ethelbert Road and parts of Ringers Road;
- LTCA 2: Bromley High Street South, which covers the non-pedestrianised part of the High Street, to the south of the Site, between Bromley South station and Ethelbert Road;
- LTCA 3: Bromley High Street North, which covers the pedestrianised part of the High Street to the north-east of the Site, extending from the junction with Ethelbert Road to the A222;
- LTCA 4: Church House Gardens and Martins Hill, which covers the open space and gardens to the north-west of the Site, extending between Ethelbert Road and across to Martin’s Hill;
- LTCA 5: The Glades, covering the indoor retail land uses to the east of the Site;
- LTCA 6: Queen’s Gardens, covering the public space to the east of the High Street;
- LTCA 7: Civic Centre, covering the council offices to the east of Kentish Way;

- LTCA 8: Elmfield Commercial, covering tall office buildings adjacent to Bromley south railway station;
- LTCA 9: St. Marks, covering residential land uses in the southern part of Bromley Town Centre, including the taller buildings of St Marks Tower and Perigon Heights;
- LTCA 10: Bromley East Residential, located to the east of the A21 Kentish Way, consisting of a consistent pattern of two storey, white rendered properties;
- LTCA 11: Bromley South Residential, covering residential land uses to the south of the town centre and characterised by a coherent pattern of two storey properties;
- LTCA 12: Bromley West Residential, covering residential land uses between Bromley and Shortlands, situated in a low lying position within the Ravensbourne Valley and characterised by a consistent two storey height;
- LTCA 13: Bromley North covering residential and transport land uses to the north of the High Street: and
- LTCA 14: Bromley South rail corridor covering the alignment of the London to Bromley South railway line, which severs the townscape pattern.

6.4 From the above, there are a variety of land uses surrounding the Site, resulting in a varied urban grain in terms of building heights, massing and architectural styles. Due to this, the architectural quality of the townscape surrounding the Site is also varied.

6.5 The scale of buildings adjacent to the High Street is generally consistent, ranging between 2 to 4 storeys. The main increases in height and mass is at the junction of Elmfield Road and the High Street via the Glades.

6.6 Taller buildings are interspersed across the High Street, with the Churchill Theatre in the northern part of the town centre, the Crest Building and Mall Tower in the central parts of the town centre and St. Marks Tower and Perigon Heights in the southern part of the town centre.

Townscape Receptor Summary

6.7 From the above townscape baseline review and with reference to TVIA **Appendix 6** (which sets out receptor sensitivity), the following townscape receptors have been identified for the assessment with their associated sensitivity.

Table 5.1: Townscape Receptor Summary

Townscape Receptor	Sensitivity
<i>Published Landscape / Townscape Character Areas</i>	
NCA 113: North Kent Plain (covers the Site)	Low
BTCAAP Bromley Central (covers the Site)	Medium
BTCAAP The Northern Gateway	Medium
BTCAAP The North Village	Medium
BTCAAP Western Edge	High
BTCAAP Civic Centre	Low
BTCAAP Bromley South	Low

Townscape Receptor	Sensitivity
Conservation Areas	
Bromley Town Centre Central (Pedestrianised) High Street Conservation Character Area	High
Bromley Town Centre Ravensbourne Conservation Area	High
Shortlands Village Conservation Area	High
ETLA Local Townscape Character Types (LTCT) and Areas (LTCA)	
LTCT 1: Bromley	Medium
LTCA 1: Residential Town Centre	Medium
LTCA 2: Bromley High Street South (covers the Site)	Low
LTCA 3: Bromley High Street North	Medium
LTCA 4: Churchill Gardens and St Martins Hill	High
LTCA 5: The Glades	Low
LTCA 6: Queen's Gardens	High
LTCA 7: Civic Centre	Low
LTCA 8: Elmfield Commercial	Low
LTCA 9: St. Marks and Perigon Heights	Low
LTCA 10: Bromley East Residential	Medium
LTCA 11: Bromley South Residential	Medium
LTCA 12: Bromley West Residential	Medium
LTCA 13: Bromley North	Medium
LTCA 14: Bromley South rail corridor	Low
ETLA Site Area	
The Site	Low

Bromley Local Plan Policy 48	ETLA Baseline Review
From Addington Hills of panorama across Crystal Palace, Penge, Beckenham and Greenwich towards Shooters Hill, Isle of Dogs and Blackwall Reach	The location is 7km to the south-west of the Site, with the alignment of the view being northwards and not towards the Site. In combination with the intervening woodlands, the Site would not be visible and this location has been scoped out of the assessment.
From Crystal Palace Park of Bromley, Beckenham and West Wickham	This has been scoped into the assessment and included as viewpoint 36.
View over City and Docklands from Hayes Common	This has been scoped into the assessment and is included as viewpoint 35.
View over City and Docklands from Walden recreation ground, Chislehurst	The location is 3km to the north-east of the Site and the orientation of the view is north-west and not towards the Site. The Site would not be visible and the location has been scoped out of the assessment
View of Croydon town centre from Village Way, Beckenham	The location is 3km to the south-west of the Site and the orientation of the view is south-west and not towards the Site. The Site would not be visible and the location has been scoped out of the assessment
View of Keston Ridge from southern section of Bromley High Street	As the location is to the south of the Site and the orientation of the view is southwards, away from the Site, the location has been scoped out of the assessment
View east over Kent from Crofton Road, Orpington	As the stated orientation of the view is eastwards and not in the direction of the Site, this location has been scoped out of the assessment
View west and south from Martins Hill	This has been scoped into the assessment and included as viewpoint 16.
View of eastern and western skylines of the Ravensbourne Valley	This has been scoped into the assessment and included as viewpoint 17.
View from Chelsfield Green looking north towards the Cray Valley	As the viewpoint is located 9km to the south-east of the Site and the view is orientated north (not towards the Site) this location has been scoped out of the assessment.
Landmarks	
St George's Church, Bickley	Due to the distance and intervening features between the Site and St. George's Church this landmark has been scoped out of the assessment
St Edmunds Church, Beckenham	Due to the distance and intervening features between the Site and St. Edmund's Church this landmark has been scoped out of the assessment
Churchill Theatre and Library, Bromley	The landmark is covered by the extent of the townscape assessment and is within many of the views identified in the visual assessment
Crystal Palace BBC TV mast	A view from Crystal Palace has been scoped into the assessment as viewpoint 36.
Keston Windmill	Due to the distance and intervening features between the Site and Keston Windmill this landmark has been scoped out of the assessment
Major Skylines	
Keston Ridge	This has been scoped into the assessment and included as viewpoint 35.
Crystal Palace	This has been scoped into the assessment and included as viewpoint 36.

7.0 VISUAL APPRAISAL

7.1 As set out in the methodology, the TVIA include an assessment of the likely change to people's views (visual receptors). The identification of people's views is based on a representative range of differing groups, e.g. residents, recreational users or motorists.

7.2 The identification of the representative views is a three stage process, covering desk based reviews and fieldwork.

Stage 1: Desk based review

7.3 With reference to **Figures L04 and L05**, the visual study area extends up to 6.7km from the Site, to cover:

- The Ravensbourne Valley, 1.5km to the north-west of the Site;
- Widmore, 1km to the east of the Site;
- The Keston Ridge, 4.3km to the south of the Site; and
- Crystal Palace Park, 6.7km to the north-west of the Site.

7.4 From a review of relevant policies and publications, the Site is not covered by any of the London View Management Framework designated views.

7.5 With reference to Policy 48 of the Bromley Local Plan, the Table 6.1 summarises the review of the stated 'Views of Local Importance', 'Landmarks' and 'Major Skyline Ridges'.

Table 6.1: Summary of Bromley's Local Plan Policy 48

Bromley Local Plan Policy 48	ETLA Baseline Review
<i>Views of Local Importance</i>	

7.6 With reference to the BTCAAP, the Site is within the 'key view' from the pedestrian bridge across the railway. This location is included within the visual assessment as viewpoint 8.

7.7 Other relevant BTCAAP 'key views' from across the study area are:

- from the south-east of Bromley South Station (included as viewpoint 26);
- Church House Gardens (included as viewpoints 10, 11 and 15); and
- Martin's Hill (included as viewpoint 16).

Stage 2: Zone of Theoretical Visibility (ZTV)

- 7.8 A ZTV of the Proposed Development has been undertaken to identify the theoretical visibility of Block A and Block B across the study area. The methodology for the ZTV is set out in **TVIA Appendix 1**, but in summary the modelling extrapolates the height of the Proposed Development across the study area to depict areas from which Block A and Block B may be theoretically visible.
- 7.9 With reference to **Figure L04**, which covers a 3km radius from the Site, the locations from which the Proposed Development would be theoretical visible from are illustrated by the blue hatching.
- 7.10 The ZTV demonstrates that the theoretical visibility of the Proposed Development would be concentrated in close proximity to the Site and on a north-west to south-east axis. This is assessed as reflecting the alignment of the Ravensbourne Valley, which consists of elevated and rising landform to the south of Bromley and lower lying landform to the north-west of Bromley.
- 7.11 Beyond Bromley Town Centre, the theoretical visibility also extends to intermittent locations to the north-east of the Site, several residential areas to the east of the Site and open spaces to the south-east of the Site.
- 7.12 To the west of the Site and Bromley Town Centre, the theoretical visibility is generally consistent across residential parts of Shortlands, before noticeably reducing to the west of South Hill Road. This is assessed as reflecting the underlying pattern of ridgelines in this part of the townscape and their influence of the visibility of the Proposed Development.
- 7.13 With reference to **Figure L04A**, which covers a 6.7km radius from the Site, the theoretical visibility of the Proposed Development remains concentrated to the south of Bromley, across the elevated landform of Bromley and Hayes Common. There is also intermittent visibility extending to the west of Bromley, covering Crystal Palace Park.

Stage 3: Fieldwork

- 7.14 Fieldwork has been undertaken from across the study area between November 2020 and March 2021 to verify the above desk based studies and ZTV and to identify the visual receptors for the assessment with corresponding Type 1 photography¹⁶.
- 7.15 The location of each of these views is illustrated on **Figure L05 Sheets 1 to 72**, with the accompanying photographs illustrating the views obtained from these viewpoint locations. A detailed analysis of the composition of the existing view and the visibility of the Site is set out in **TVIA Appendix 3**. This analysis

is summarised below, in relation to close, mid and long range views with reference to the relevant viewpoints.

Close Range Views (Immediate Views)

- 7.16 The existing building within the Site are visible at close range, from along Ringers Road and Ravensbourne Road, Ethelbert Road and Ethelbert Close. These existing buildings are seen as part of the varied building styles which extend across landform which falls from the High Street to Ravensbourne Road. The composition of views is channelled due to the alignment of these roads, with the extent of views either truncated by the more elevated High Street or extending westwards across the residential suburbs. Nos 2-4 Ringers Road do not exhibit any visual interest due to their lack of architectural detailing.
- 7.17 The main difference in the composition of views at close range is between the views along Ringers Road versus those along Ethelbert Road. In views along Ringers Road (**Viewpoint 1**) the Crest Building is visible at close range, along with the Mall Tower in the background of the view. The composition of the view is already demarcated by a notable change in building heights. In comparison, views along Ethelbert Road (**Viewpoint 2**) are characterised by a more consistent scale of residential buildings, with the Crest Building screened by intervening buildings. The composition of the view still includes taller buildings, with St. Marks Tower forming a focal point beyond Ravensbourne Road.



Extract of Viewpoint 1: View from Ravensbourne Road, looking east along Ringers Road, with the taller buildings of the Crest Building opposite the Site and the white facade of the Mall Tower visible in the background of the view.

¹⁶ The photography and corresponding presentation of viewpoints has been undertaken in accordance with the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals, 2019, <https://www.bing.com/search?q=landscape+instiute+technical+guidance+note+06%2F19&cid=6f72f810eca848>

7.18 From the High Street, the existing buildings within the Site are not visible due to the intervening buildings and the alignment of the road networks. The potential for a taller buildings to be visible remains, due to the low height of buildings along the High Street and at the junction with Elmfield Road (**Viewpoints 5 to 10**). The composition of these views includes the taller buildings of the Crest Building and St Marks Tower set back from the High Street, which demarcates a change in building heights between the High Street and the surrounding streets.

7.19 From the northern part of the High Street (**Viewpoints 11 to 13**), the height of the Crest Building and St Marks Tower is such that they form focal points in the background of the view, due to the channelled composition of the view due to the alignment of the road networks. The Site (ground level) is not visible, but views towards the Site are therefore in the direct context of taller buildings demarcating the skyline and exhibiting varied roof profiles.

Mid-Range Views

7.20 To the north and north-west of the town centre, the open spaces across the Ravensbourne Valley (including Queensmead) enable varying views of Bromley's town centre. Within the grounds of Church House Gardens (**Viewpoint 15**) the upper parts of the Crest Building is visible, although softened by intervening vegetation. The Churchill Theatre is also visible, being in close proximity to the receptor.

7.21 These buildings are not visible from the northern parts of Martin's Hill (**Viewpoint 16**) due to the density of the intervening vegetation, such that the focus of the view is the Bromley War Memorial. However from the lower lying parts of the recreational ground, at Queensmead, there are views across Bromley's townscape (**Viewpoint 17**), consisting of taller buildings extending between the Churchill Theatre across to St Marks Tower. Views extend towards the Site, seen in the context of the Crest Building and The Mall Tower, such that there is already a strongly defined visual relationship between the High Street and recreational areas bordering Bromley town centre.

7.22 To the east of the town centre, the more gently undulating landform and density of the settlement pattern results in less open views towards the town centre. Views are either channelled along the road networks or framed by intervening buildings (**Viewpoints 21 to 25**) and include the upper parts of tall buildings adjacent to Elmfield Road, the Mall Tower and the upper parts of the Crest Building. Views towards the Site are therefore defined by a notable change in scale between intervening residential two storey land uses and taller buildings forming the skyline.

7.23 In contrast, to the west of the town centre, the more undulating pattern of landform enables a greater visibility of buildings across the town centre (**Viewpoints 27 to 30**). The composition of the view consists of a consistent scale of residential properties in the foreground, with taller massing in the background of the view, in the town centre. This includes the Mall Tower, the Churchill Theatre and Crest Building, which extend above the skyline, such that views towards the Site are already characterised by tall buildings forming the background of the view.



Extract of Viewpoint 17 demonstrating that tall buildings extend above the residential suburbs to demarcate the town centre. The Site (ground level) is not visible, but is located in the central part of the view adjacent to the red brick and slightly angled roof of the Crest Building. St. Marks Tower is to the right of the view, consisting of a white and grey façade and angled roof.

Long Range Views

7.24 To the south-east and south of the town centre, there are views towards the town centre from many of the open spaces and residential areas situated across more elevated landform (**Viewpoints 31 to 34**).

7.25 From the open spaces, including Norman Park (**Viewpoint 32**), the upper parts of St Marks Tower are visible, along with the Crest Building and Perigon Heights. These buildings are consolidated within the central part of the view, with the remainder of the skyline formed by vegetation across the Park.

7.26 From the Keston Ridge (**Viewpoint 35**), the density of the intervening vegetation screens views towards Bromley. In contrast, from the elevated terraces of Crystal Palace Park (**Viewpoint 36**) there are panoramic views eastwards, which includes Bromley. The upper parts of the Churchill Theatre, the Crest Building and St Marks Tower are visible, being consolidated within the overall extent of the view, such that views towards the Site are seen in this context.



Visual Receptor	Sensitivity
22. Recreational users at Plaistow Lane	Medium
23. Residents on Bishops Avenue	Medium
24. Residents at The Chase	Medium
25. Residents at Murray Avenue	Medium
26. Motorists on the A21 at the southern approach to Bromley	Low
27. Residents on Cameron Road	Medium
28. Residents on Cumberland and Durham Avenue	Medium
29. Residents on Cumberland Avenue	Medium
30. Residents on Kingswood Road	Medium
31. Recreational users at Southlands Park	High
32. Recreational users at Norman Park	High
33. Recreational users at Langley Park	Medium
34. Residents on Chesham Avenue	Medium
35. Recreational users at Keston Common	High
36. Visitors and recreational users at Crystal Palace Park	High

Extract of Viewpoint 36 from Crystal Palace Park, with long range views towards Bromley with the Site in the central part of the photograph.

Summary of Visual Receptors

7.27 With reference to **TVIA Appendix 7**, (which sets out the visual sensitivity of receptors) the fieldwork has identified a range of people's views. Table 6.1 summarises the visual receptors for the assessment of the Proposed Development and their sensitivity.

Table 6.1: Visual Receptor Summary

Visual Receptor	Sensitivity
1. Residents on Ravensbourne Road / Ringers Road	Medium
2. Residents on Ethelbert Road	Medium
3. Residents on Ethelbert Close	Medium
4. Visitors and pedestrians on Elmfield Road / Bromley High Street	Medium
5. Visitors and pedestrians on Elmfield Road	Medium
6. Visitors and pedestrians on Bromley High Street	Low
7. Visitors to Bromley at Bromley Railway Station	Low
8. Pedestrians crossing the railway line	Medium
9. Residents on Ridley Road	Medium
10. Recreational users in Church House Gardens	High
11. Visitors to the Churchill Theatre	Medium
12. Visitors and pedestrians on Bromley High Street	Medium
13. Visitors and pedestrians at Market Street	Medium
14. Visitors and pedestrians at Church Road	Medium
15. Visitors and recreational users at Church House gardens	High
16. Recreational users at Martins Hill (Bromley War Memorial)	High
17. Recreational users at Martins Hill recreation ground (Queensmead)	High
18. Visitors and pedestrians adjacent to Bromley College	High
19. Motorists on the A21 on the northern approach to Bromley	Low
20. Pedestrians on Beckenham Lane	Low
21. Pedestrians on Farnaby Road	Low

8.0 RELEVANT POLICY

8.1 With reference to **TVIA Appendix 4**, the following policies are relevant to townscape (including landscape) and visual matters.

National Planning Policy Framework (NPPF), 2021¹⁷

8.2 The relevant NPPF policies are paragraphs:

- 8 - outlining that the economic, social and environmental objectives of sustainable development;
- 92 - outlining the use of street layouts which allow for easy pedestrian and cycle connections within and between neighbourhoods;
- 124 – which outlines that planning policies and decisions should support development that makes efficient use of land, taking into account promoting regeneration and change;
- 125 – which sets out area-based character assessments can be used to help ensure that land is used efficiently;
- 126 - in respect of achieving well-designed places; and
- 130 – requiring planning decisions to ensure that development will function well and add to the overall quality of the area, including being visually attractive and sympathetic to local character and history;
- 132 – requiring early consideration of design quality and engagement with communities;
- 134 – which sets out that significant weight should be given to development which promotes high levels of sustainability and help raises the standard of design in an area, as long as they fit in with the overall form and layout of the area; and
- 174 – requiring planning decisions to contribute to and enhance the natural and local environment.

The London Plan 2021¹⁸

8.3 The London Plan is the spatial development strategy for Greater London and sets out how London will develop, with its policies informing decisions on planning application across London. The intention is that the London Plan and Borough Local Plans work in ‘conformity’ to achieve a co-ordinate strategy for sustainable development.

8.4 Relevant policies are:

- D1: London’s form, character and capacity for growth, which sets out the boroughs should undertake area assessments to define the characteristics, qualities and value of different places;
- D3: Optimising site capacity through the design-led approach, whereby development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness;
- D4: Delivering Good Design, which sets out that masterplans and design codes should be used to aid bringing development forward and that the design of development should be scrutinised via design reviews;
- D8 Public Realm, which requires development proposals to be attractive, well designed and be based on how the space will function;
- D9: Tall Buildings, which sets out that Boroughs should determine if there are appropriate locations for a tall building and development proposals should address the visual impact of tall buildings from different distances and that buildings should make a positive contribution to the skyline;
- G1: Green Infrastructure, which sets out that London’s network of green and open spaces should be protected and enhanced; and
- G5: Urban Greening, which sets out proposals should seek to meet the Urban Greening Factor, with a target score of 0.4 for residential developments.

London Plan, Supplementary Planning Guidance, Character and Context, 2014¹⁹

8.5 This sets out guidance on the attributes of character and context in London and an analysis of the interrelationships between different aspects of character, and how it can be articulated and presented.

8.6 The SPG sets out the importance of a study area, identifying the character and sensitivity of a place and analysing impacts.

London Plan, London View Management Framework (LVMF), 2012²⁰

8.7 This SPG sets out the important views to be protected across London. The Site is not within any of the LVMF view corridors.

London Borough of Bromley, The Bromley Local Plan, adopted 2019²¹

8.8 The Local Plan, in combination with the London Plan, is used to determine planning applications

¹⁷ Department of Communities and Local Government, National Planning Policy Framework, 2021, [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544592/nppf-2021.pdf)

¹⁸ The London Plan, https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

¹⁹ London Plan, <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/character-and-context>

²⁰ London View Management Framework, <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management>

²¹ London Borough of Bromley, https://www.bromley.gov.uk/info/1004/planning_policy/1263/the_bromley_local_plan

8.9 With reference to the on-line Local Plan²², the Site is covered by Policy 90: Bromley Town Centre Opportunity Area, requiring new homes and jobs with reference to the Bromley Town Centre Area Action Plan, with relevant policies set out in **TVIA Appendix 4**.

8.10 Policy 47: Tall Buildings states:

“Proposals for tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area. Tall and large buildings will need to be of the highest architectural design quality and materials and be appropriate to their local location and historic context, including strategic views. Proposals for tall buildings will be required to follow the current Historic England Guidance.”

8.11 The supporting text for Policy 47: Tall Buildings states:

“Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline. Much of the Borough is not considered appropriate for tall buildings due to the established suburban character of the Borough. However, potential may exist for such development to be considered in town centre locations which benefit from good public transport, exhibit an existing local built character that would allow for taller buildings, and where no harm would be caused to heritage assets, the wider historic environment or important views. The adopted Bromley Town Centre Area Action Plan identifies potential sites for tall buildings within the town centre.”

8.12 Policy 48: Skyline states:

“The Council will require developments which may impact on the skyline to demonstrate how they will protect or enhance the quality of the views, vistas, gaps and skyline listed below.”

8.13 The supporting text for Policy 48: Skyline states:

“The presence of a view or vista listed below will need to be taken into account in the design quality, configuration, height and site layout of new development or extensions to existing developments which may impact them. Views will need to be considered to ensure intrusive elements are not introduced whether in the foreground, middle ground or background through a visual impact assessment. The Council will work in partnership with neighbouring boroughs where there are cross-boundary views and settings so that these are positively managed.”

London Borough of Bromley, Bromley Town Centre Area Action Plan, 2010

8.14 The BTCAAP sets out the Council’s vision for the town centre together with objectives, policies and proposals to guide future development and change, based upon enhancing Bromley.

8.15 With reference to TVIA Appendix 3, the relevant BTCAAP policies are:

- Policy BTC2: Residential Development, which requires development to take into account site characteristics and the surrounding character of the town centre and adjoining residential areas;
- Policy BTC15: Biodiversity, which sets out the new development should have regard to opportunities to use native species planting to encourage biodiversity and to enhance areas of open space and linkages between defined areas of open space;
- Policy BTC17: Design Quality, which requires the highest standard of design in all new development, such that they enhance the appearance and environment of the town centre and include an appropriate enhancement of the historic environment. The design of new development will be required to reflect the Character Area analysis set out in the BTCAAP;
- Policy BTC18: Public Realm, which requires high quality, well designed and well connected public realm;
- Policy BTC19: Building Height, which requires assessments as part of any planning application. In particular, it will be necessary to take account of key views and vistas and impact on the character of town centre and Conservation Area (views from these locations are included in the visual assessment);
- Policy OSG: West of High Street, whereby the Council will work with developers to promote regeneration.

London Borough of Bromley General Design Principles Supplementary Planning Document (SPD)²³

8.16 The SPD sets out the Council’s commitment to maintain Bromley as a place which is ‘attractive, green and environmentally sustainable’ and the Council seeks to promote high quality, innovative design in new development, which will ‘add value and provide better places to live.’

8.17 The SPD sets out objectives of design, which include character, continuity and enclosure, quality of public realm and legibility.

London Borough of Bromley Residential Design Guidance, SPD²⁴

8.18 The SPD sets out that good design is ‘key to maintaining, enhancing and developing the borough’s residential environment.

8.19 General advice include respecting local distinctiveness, retaining trees, the important role of gardens as a setting to buildings and design and form.

²² London Borough of Bromley, Bromley Local Plan on-line mapping, <https://planvu.co.uk/bromley/>

²³ London Borough of Bromley, https://www.bromley.gov.uk/downloads/file/216/general_design_principles

²⁴ https://www.bromley.gov.uk/downloads/file/217/residential_design_guidance

9.0 MITIGATION BY DESIGN

9.1 The TVIA has informed the iterative design process for the Proposed Development via a Tall Building Study to review potential buildings heights within the Site, followed by a mitigation by design rationale to develop the building massing to an articulated design.

ETLA TALL BUILDING STUDY

9.2 With reference to **Appendix 5** the Tall Building Study was undertaken via fieldwork and computer generated images of Bromley's townscape via VuCity (a 3d computer software programme) and also included the future baseline massing of the Churchill Quarter. At the time of the Tall Building Study, there was also an application for redevelopment of 66-70 Bromley High Street (ref: 19/04588/FULL1) and this was also acknowledged in the study.

9.3 For ease of reference, the Tall Building Study concluded:

- In close range views, the taller heights to Block A and Block B would result in a more notable step change in scale in comparison to existing buildings along Ringers Road and Ethelbert Road.
- In mid to long distance views, both Block A and Block B would be visible and seen in the context of other tall buildings including the Churchill Theatre and the Crest Building on Ringers Road;
- Block A would establish a visual relationship with the Churchill Quarter between 14 to 19 storeys in height and increasing the building heights of Block A and Block B provides the opportunity for demarcating the Site and the transition between the High Street and Market Street as well as establishing a cluster of buildings around Block A;
- In mid-range views, from the northern parts of Bromley High Street, Block A would be visible between 7 and 19 storeys in height. Block A would reflect the existing composition of the view, by forming a focal point in the view and a taller building in comparison to those on the High Street, similar to the Crest Building and the upper part of St Marks Tower;
- In relation to the future baseline, the Churchill Quarter would introduce additional height and massing within the view and adjacent to the High Street. This would substantially reduce the visibility of Block B. Block A would remain visible, with the taller height of Block A, at 18 and 19 storeys, reflecting the height of the upper parts of the Churchill Quarter;
- Given the future baseline context of the Churchill Quarter, taller buildings heights for Block A and Block B would be appropriate in townscape and visual terms in establishing a logical and coherent link to the taller future baseline massing;
- Key to the successful integration of Block A and Block B will be the architectural detailing and materials, particularly the upper storeys of Block A to create a building form which reflects the scale and form of the Crest Building and St. Marks Tower and reduces the overall perceived mass of the Proposed Development; and

- In both the existing and future baseline context, it is considered that tall buildings can be successfully accommodated within the Site. This is due to the existing height and potential relationship of the Proposed Development to the Crest Building, to create a unified cluster of buildings to the west of the High Street.

TOWNSCAPE AND VISUAL OPPORTUNITIES AND CONSTRAINTS

9.4 The opportunities for developing the Site in townscape and visual terms are that the Site:

- is not covered by any statutory landscape or townscape designations;
- is part of the BTCAAP Development Zones;
- is adjacent to an identified BTCAAP 'possible location for taller building';
- does not exhibit any rare or distinctive townscape features, such that the existing No 2-4 buildings do not contribute positively to the townscape and visual amenity;
- is at a key point within the townscape, demarcating the transition between Church House gardens and the High Street and the vehicular and pedestrianised parts of the High Street;
- is seen within the context of tall buildings in both close, mid and longer distance views, with these buildings already extending above the skyline, such that tall buildings within the Site would be in keeping with the local character; and
- is between future baseline development phases of the Churchill Quarter and is therefore part of a townscape where the character and skyline could be fundamentally altered in comparison to the existing context.

Constraints

9.5 The constraints relating to development of the Site in townscape and visual terms are that:

- the Site is in close proximity to residential properties, both in terms of close range visibility and lower buildings height such that there would be close range changes in scale; however this is not uncharacteristic of the townscape, with taller residential land uses at the Crest Building, on the opposite side of Ringers Road. In the context of the future baseline, the Churchill Quarter massing would fundamentally alter this existing context;
- the Site is visible from several identified views within the Bromley Local Plan, but is seen in the context of other tall buildings and the design can provide a positive response to the skyline and townscape through its massing, form and articulation; and
- the Site is adjacent to a Conservation Area, which will require a high quality design to respond positively to the Conservation Area.

MITIGATION BY DESIGN RATIONALE

9.6 To develop upon the principle of new taller massing within the Site, the TVIA mitigation design rationale for the articulation of the building established the following principles:

Positive response as a Landmark and the Skyline

9.7 The Proposed Development should be a:

- landmark to reflect its location adjacent to a defined 'tall building' within the BTCAAP and opposite the Crest Building, whilst retaining the prominence of the Churchill Theatre within the townscape and local views;
- landmark to reflect its central location within Bromley, between the interchange of the pedestrianised and vehicular parts of the High Street, as well as between the High Street and the southern parts of Church House gardens;
- landmark in relation to the cultural association of the conservation area to the north of the Site;
- consider the height of Blocks A in the context of Bromley's landmarks (the Churchill Theatre, The Mall Tower and St Marks Tower) from the residential suburban townscape; and
- provide a higher architectural quality than tall buildings across Bromley (the Mall Tower, Crest Building and buildings adjacent to Elmfield Road), which are visible above the skyline but do not have a high architectural quality.

Positive response to the Townscape Character, Structure and Cultural Association

9.8 The Proposed Development should:

- introduce high quality buildings at Block A and Block B and associated public realm to regenerate the Site;
- delineate the form of the upper parts of Block A and Block B in response to the conservation area;
- implement new planting to complement the planned arrangement of the buildings; and
- the layout should introduce an active and positive street frontage with Ringers Road and Ethelbert Road to demarcate the sense of arrival and journey between the High Street and Church House gardens (part of the Conservation Area).

Integration with the Local Townscape

9.9 The Proposed Development should:

- articulate the overall mass of Block A and Block B through varying facades and heights of the buildings, with clear delineation between the lower, middle and upper parts of tall buildings;
- Block A and Block B should have their own identity, whilst forming part of a holistic arrangement;

- the layout should incorporate open spaces, increasing the vegetation cover across the Site;
- the design should implement high quality local materials, enhanced by detailing;
- the layout should incorporate sensitively designed access points; and
- the design of the Proposed Development should sympathetically address the transition in scale between tall buildings and the adjacent residential land uses as best as practicable.

Integration with the Future Baseline

9.10 In the context of the Churchill Quarter, the Proposed Development:

- Block A should provide a counterbalance to the taller massing across the northern part of the Churchill Quarter layout;
- Block B should respond to the height of the Churchill Quarter adjacent to Ringers Road; and
- Block A should form a centre point to the massing across the Churchill Quarter and the Crest Building, to unify these taller buildings across the skyline, such that the Proposed Development sits as part of group of buildings in this part of the townscape.

10.0 THE PROPOSED DEVELOPMENT AND LIKELY TOWNSCAPE AND VISUAL EFFECTS

THE PROPOSED DEVELOPMENT

10.1 With reference to the drawings for determination, the Proposed Development would consist of two new buildings, Block A (adjacent to Ringers Road) and Block B (adjacent to Ethelbert Road), connected by a new public realm.

10.2 Block A would be ground plus 13 storeys in height, up to 103.82m AOD.

10.3 Block B would be ground plus 11 storeys in height, extending up to 97.33m AOD.

LIKELY TOWNSCAPE EFFECTS – EXISTING BASELINE

10.4 As set out in the methodology, an assessment of the likely townscape effects as a result of the Proposed Development has been undertaken in relation to the existing context (baseline) and the future baseline of the Churchill Quarter.

10.5 The following section summarises these townscape effects and should be read in combination with **Appendix 6**, which sets out the townscape effects in full, photographs at Figure L05 and VuCity views at Figure L06.

The Site

10.6 At the Site level, the Proposed Development would replace the existing buildings with new residential land uses and associated public realm.

10.7 The lower part of Block A would be delineated by a stepped alignment in the façade, increasing in height east to west. Due to this, at the eastern part of the building the lower part of Block A would reflect the first storey height of the TX Maxx building. At the western part of the building, the height of the ground floor would reflect that of five storeys of the adjacent property. The middle part of Block A would consist of a staggered alignment of windows with an alternating pattern of balconies, culminating in a stepped roof profile.

10.8 The lower part of Block B would be delineated by a staggered pattern of several materials across the façade. The upper part of Block B would consist of a stepped arrangement to the building massing to enable a roof terrace at the western part of the building at 89.93m AOD. The perceived massing of the two upper storeys would be reduced by the extent of windows, which in combination with step would result in a clear demarcation of the upper part of the building.

10.9 Block A and Block B would therefore be taller than the existing buildings on Site and of a higher architectural quality, which along with the new public realm and sedum roof would increase the scenic quality of the Site and the 'green infrastructure'. This would result in a high change to the townscape

character at the Site level. In relation to the low sensitivity of the Site, the high change is assessed as resulting in a **moderate beneficial** effect.

Published Townscape Character Areas

10.10 With reference to **Appendix 6**, the Proposed Development would be located in the BTCAAP 'Bromley Central character area'.

10.11 The Proposed Development would replace No 2 – 4 Ringers Road which do not contribute positively to the townscape due to their very low architectural quality. Block A and Block B are considered to be of a high architectural quality via the delineation of the façade, the stepped massing of the buildings and the use of brick and glass across the façade and the new public realm.

10.12 As the change would occur within the Site, the street pattern and alignment of Ringers Road and Ethelbert Road would remain, along with the underlying pattern of landform. The physical change to the townscape fabric would therefore be very localised.

10.13 Both Block A and Block B would be taller than the existing buildings along Ringers Road and Ethelbert Road. The height of the Proposed Development, specifically Block A, would be perceived from most of the character area, including at the junction of Market Square and the north and south parts of the High Street, as it would extend above the Crest Building. Block B would be perceived as being of the same height as the Crest Building.

10.14 The proximity to the Crest Building would enable the Proposed Development (in combination with the Crest Building) to form a cluster of taller buildings, and reflect the existing character of taller buildings along Ringers Road, being set back from the High Street.

10.15 The height of the Proposed Development would also be perceived in the wider context of the Churchill Theatre, The Mall Tower and the tall office buildings adjacent to Elmfield Road (Bank of America) which demarcate different parts of the town centre.

10.16 The scale and form of the Proposed Development would reinforce the character area as the main core of Bromley and the contextual position as the route between the High Street and Church House Gardens and the proximity to the transition between the pedestrianised and vehicular parts of the High Street.

10.17 The varied finishes to the ground floors of Block A and Block B would respond positively to the stated BTCAAP character area guidelines of 'encouraging active edges to the street frontages.' The lower height of Block B and the stepping down in scale from Block A, would respond positively to the Conservation Area to the north of the Site and the transition in the character area to the vegetated grounds of Church House Gardens, in accordance with the guidelines to respond to these designations.

10.18 From the above, the change to the 'Bromley Central character area' is assessed as low. In relation to the low sensitivity of the character area, the low change would result in a **minor beneficial** effect.

10.19 For the remaining published townscape character areas, the Proposed Development would not result in any physical change to the townscape fabric. The Proposed Development would be perceived in the context of the Crest Building, which already demarcates tall buildings on Ringers Road. With reference to **Appendix 6**, the townscape effects to the surrounding townscape areas are predicted to range between **no change and negligible beneficial**.

ETLA Local Townscape Character Types (LTCT) and Areas (LTCA)

10.20 With reference to **Appendix 6**, the Proposed Development would be located in LTCT 1: Bromley. The Proposed Development would introduce buildings of a higher architectural quality than the existing buildings within the Site, via their form and building materials. As the change would be at the Site level, the physical change to the townscape fabric would be very limited in relation to the LTCT, with the street pattern remaining.

10.21 Block A would be up to three storeys taller than the Crest Building on the opposite side of Ringers Road, but would be located in close enough proximity to the Crest Building to be perceived as part of a co-ordinated group of taller buildings, reflecting the existing character of this part of Ringers Road. Similarly, Block B would reflect the height of the Crest Building, such that the overall massing would form a stepped arrangement and varied skyline between Block B, Block A and the Crest Building.

10.22 The change to LTCT 1: Bromley is assessed as negligible and in relation to the medium sensitivity, the Proposed Development would result in a **negligible beneficial** effect.

10.23 The Proposed Development would be located in LTCA 2: Bromley High Street South and it would improve the architectural and public realm of the character area, as well as the perception of the area via high quality architectural design. The change is assessed as moderate and in relation to the low sensitivity, the Proposed Development would result in a **minor beneficial** effect.

10.24 For the remaining LTCA and with reference to **Appendix 6**, the perception of the architectural quality of the Proposed Development and improvement to the townscape would result in effects ranging between **no change and minor beneficial**.

LIKELY TOWNSCAPE EFFECTS – FUTURE BASELINE

10.25 As set out in the methodology, the future baseline assessment assumes that the BTCAAP Development Zones are implemented, specifically the Churchill Quarter. The assessment of the Proposed Development is therefore based on the additional change that would result from the introduction of Block A and Block B in this future context.

10.26 At the Site level, the effects would remain as stated for the existing baseline, at **moderate beneficial**, due to the high change resulting from the introduction of two new buildings of a high architectural quality.

10.27 In relation to the published townscape character areas and the BTCAAP 'Bromley Central', with the implementation of the Churchill Quarter, the Proposed Development would be integrated into a townscape consisting of taller buildings. Block A would reflect the scale of the southern part of the Churchill Quarter, whilst the height of Block A would reflect the height of the northern part of the Churchill Quarter. The public realm within the Proposed Development would also provide co-ordinated linkages with the public realm across the Churchill Quarter. The change of the Proposed Development to the BTCAAP Bromley Central area is therefore assessed as negligible, given the alterations to the townscape that would have occurred and the effect of the Proposed Development is predicted as **negligible beneficial**.

10.28 In relation to the ETLA LTCA 2: Bromley High Street South, Proposed Development would be similarly sited in a townscape of taller buildings, such that the change from the Proposed Development is assessed as low and the effect is predicted to be **negligible beneficial**.

VISUAL EFFECTS – EXISTING BASELINE

10.29 As set out in the methodology, an assessment of the likely visual effects as a result of the Proposed Development has been undertaken in relation to the existing context (baseline) and the future baseline of the Development Zones (Churchill Quarter).

10.30 The following section summarises these visual effects and should be read in combination with **Appendix 7**, which sets out the visual effects in full.

Close Range Views (Immediate Views)

10.31 For residents on Ringers Road and Ravensbourne Road, Block A would be visible, extending above the buildings on the north side of Ringers Road. The upper 3 storeys of Block A would extend above the Crest Building on the south side of Ringers Road.

10.32 The west façade of Block A would consist of a vertical alignment of windows to provide a symmetrical arrangement to the façade, reflecting that across the Crest Building, whilst the stepped profile would provide interest to the top of the building and to the skyline.

10.33 The upper two storeys of Block B would also be visible, being set back from the alignment of Block A via the mirrored step in the building form, reflecting the underlying landform. The extent of windows across the upper parts of Block B would reduce the perceived massing of the building. The height of Block B would mirror that of the Crest Building, such that the combination of Block A, Block B and the Crest

- Building would form a cluster of buildings within the composition of the view, with Block A being the pinnacle building within this arrangement.
- 10.34 The composition of the view already includes tall buildings as focal points, both with the Crest Building and the Mall Tower. Block A and Block B would replicate this feature of the view. The building materials across Block A would provide visual interest whilst reflecting the brick of existing buildings along Ringers Road and the higher quality of the architectural form is assessed as enhancing the composition of the view.
- 10.35 For residents on Ethelbert Road and Ethelbert Close, Block A and Block B would be visible at close range, resulting in two buildings of a pronounced difference in scale in comparison to the existing buildings along Ethelbert Road. The articulation to the façade of Block B, via the differing materials, the stepped arrangement of the upper two storeys and the extent of windows would provide visual interest as well as reduce the overall perception of the massing.
- 10.36 The articulation across the lower storey of Block B would be delineated by a staggered pattern of several materials across the façade.
- 10.37 For visitors and pedestrians on the High Street, to the north of the Site, Block A would be visible above the intervening buildings and extending slightly above the Crest Building, which would remain visible. Block A would establish a stepped arrangement of massing, increasing in height from the TK Maxx building and across the Crest Building to form a consolidate cluster of tall buildings beyond the High Street. The Proposed Development would not compete visually with views of the Churchill Quarter and the Proposed Development would be lower in the skyline, such that the Churchill Quarter would remain the focal point and 'landmark' within the view.
- 10.38 Similarly in views from Ringers Road and Ethelbert Road, the stepped roof line of Block A would provide visual interest to the view, orientating the receptors view towards the High Street, whilst complementing the stepped roof alignment of the Crest Building.
- 10.39 The upper parts of Block B would also be visible, mirroring the scale of the Crest Building and the detailing via the extent of upper storey windows.
- 10.40 For recreational users in Church House Gardens the upper parts of Block A and Block B would be visible, as demonstrated although Block B would be largely softened by the intervening vegetation within the gardens. The height of Block A would be notable above the intervening properties, although the articulation to the façade would provide visual interest to the view.
- 10.41 Whilst Block A would be taller than the Crest Building, but it would not alter the visual relationship between the gardens and the town centre, which is defined by views of taller buildings of the Churchill Theatre and the Crest Building extending above residential properties. Views of Block A would provide a greater visual interest in the skyline and would not alter views towards the Churchill Theatre, which would remain as the taller building and landmark building within the composition of the view.
- 10.42 Similarly from the identified BTCAAP view, both Block A and Block B would be visible, although seen through the mesh fencing across the railway bridge as demonstrated by Viewpoint C. Block A and Block B would provide visual interest to the view, by reflecting the rhythm of building heights which exists between St. Marks Tower, the Crest Building and the Churchill Theatre. All these existing building would remain visible and the Proposed Development would not compete with the views of the Churchill Theatre, due to its lower position within the townscape and intervening distance. The height of Block A would extend above the Crest Building. The stepped arrangement to the upper storeys of Block A and Block B would reduce the perceived massing of these parts of the building and provide visual interest to the skyline. Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from the Crest Building to Block B.
- 10.43 From along the High Street, the very upper parts of Block A would be visible, as demonstrated by VuCity View F. The horizontal form to the roof of Block A would reflect the horizontal form of existing buildings along the High Street, including the roof line of no.44 High Street. The overall change to the view would be very small, with the channelled alignment along the High Street and the Churchill Theatre remaining the focal point to the view.
- 10.44 For these close range receptors and with reference to **Appendix 7**, the change from the Proposed Development would range between low and high and the effects would range between **minor and moderate beneficial**.
- Mid-Range Views**
- 10.45 From the elevated parts of the recreational grounds across Martins Hill, to the north-west of the Site, the Proposed Development would barely be visible, due to the screening from existing vegetation, as demonstrated by VuCity View A. From the lower lying parts of the recreational ground, including Queensmead, the stepped arrangement to the upper storeys of Block A and Block B would be visible, being seen at a similar height and scale as the Crest Building within the view, as demonstrated by the VuCity View E.
- 10.46 Block A and Block B would form part of the varied skyline, although situated lower in the composition of the view in relation to the Churchill Quarter. The Proposed Development would be seen as part of a composition which already consists of taller buildings above the tree line, via the Churchill Theatre, the Mall Tower, the Crest Building, Perigon Heights and St. Marks Tower.
- 10.47 Block A and Block B would provide a higher architectural quality to the view than Mall Tower and visual interest via the stepped massing.

10.48 For residents to the east of the town centre, the upper parts of Block A would be visible in the background of the view, whilst Block B would be screened by the intervening buildings. Block A would be seen in the direct context of the Crest Building, or part of the skyline of taller buildings, extending from St. Marks Tower and the tall buildings adjacent to Elmfield Road (Bank of America).

10.49 Within these views, the Proposed Development would increase the number of tall buildings in the background of the view, but reflect the existing composition which already demarcates the town centre and the change in scale between two storey residential properties and taller buildings.

10.50 On the southern and northern approaches to Bromley, along the A21, the Proposed Development would not be visible due to the height of Perigon Heights or the intervening distance and change in landform.

10.51 For residents to the west of Bromley town centre, Block A and Block B would be visible in the background of the view, being seen adjacent to the Crest Building and reducing the visibility of the Mall Tower, as demonstrated by VuCity View D. The Proposed Development and the Crest Building would form a consolidated arrangement of buildings, with Block A the taller element.

10.52 For receptors with mid-range views and with reference to **Appendix 7**, the change from the Proposed Development would range between neutral and moderate. The effects are predicted to range between **no change and minor beneficial**.

Long Range Views

10.53 From parks, open spaces and residential areas to the south-east and south of Bromley, the upper part of Block A would be visible in the background of the view, extending very slightly above the intervening residential properties, vegetation and the Crest Building.

10.54 Due to the distance and the extent of buildings within the view, the change to the composition of the view would be barely perceptible, but the stepped profile would provide visual interest to the view.

10.55 From the upper terraces of Crystal Palace, Block A and Block B would be visible, approximately 6.2km to the east of receptor. The Proposed Development would be seen situated between the Mall Tower and St Marks Tower, with views of the Churchill Theatre remaining. At this distance and in the context of views of Bromley as a whole, the change to the view would be very small as a result of the Proposed Development.

10.56 For these receptors with long range views and with reference to **Appendix 7**, the change to the view would range between neutral and low. The effects are predicted to range between **no change and negligible beneficial**.

VISUAL EFFECTS – FUTURE BASELINE

10.57 As set out in the methodology, the future baseline assessment assumes that the BTCAAP Development Zones are implemented, specifically the Churchill Quarter. The assessment of the Proposed Development is therefore based on the additional change that would result to views from the introduction of Block A and Block B in this future context of a townscape consisting of taller buildings.

Close Range Views (Immediate Views)

10.58 With the implementation of the Churchill Quarter massing, the composition of the view along Ethelbert Road would be substantially different to the existing view, via taller massing extending along the north side of the road.

10.59 The height of Block B would reflect the height of the Churchill Quarter massing. Block A would remain the taller building within the composition of the view, but would be seen as a part of the varied skyline, reflecting the rhythm in height across the Churchill Quarter massing and extending up from the combined massing of the Churchill Quarter and Block B.

10.60 From the High Street, Block A would form part of an arrangement of taller buildings extending adjacent to the High Street, between the Churchill Quarter and through to the Crest Building. The scale of Block A would reinforce this relationship of taller buildings, being set back from the High Street and retain the focus of taller buildings at the junction of the High Street and Elmfield Road.

10.61 For recreational users within Church House Gardens, in proximity to Ethelbert Road, the composition of the view from the gardens would also be substantially different to the existing view, via the Churchill Quarter massing extending along the north side of the gardens. The height of the Block B would reflect the height of the Churchill Quarter massing. Block A would remain the taller building within the composition of the view, but would be seen as a part of the varied and taller skyline.

10.62 From the northern part of the gardens, including adjacent to the Church of St. Peter and St. Paul, the Proposed Development would not be visible, due to the screening by the Churchill Quarter.

10.63 For close range receptors, the impact of the Proposed Development in relation to the future baseline would therefore reduce in comparison to the assessment against the existing context. With reference to **Appendix 7**, the impact is assessed as ranging between neutral to moderate and the effects are predicted to range between **no change and minor beneficial**.

Mid-Range Views

10.64 As per the above, with the Development Zones implementing, including the Churchill Quarter implemented, there would be a pronounced change in Bromley's skyline to the west of the High Street via new taller buildings of a higher architectural quality.

10.65 The Proposed Development would therefore be part of this massing, rather than one of a number of individual taller buildings on the skyline in relation to the existing context.

10.66 From Martin Hill's recreation ground, the Churchill Quarter would screen the Proposed Development.

10.67 With reference to **Appendix 7**, the change of the Proposed Development would range between neutral and low in mid-range views, with the effects predicted to range between **no change and negligible beneficial**.

Long Range Views

10.68 As per the mid-range views, the Development Zones would be visible in long range views, forming a new skyline across Bromley Town Centre. The Proposed Development would form a co-ordinated part of this massing, with the stepped roof profile of Block A differentiating it from the Churchill Quarter massing. This articulation to the building form is assessed as providing visual interest to the view.

10.69 Due to the distance from the Site, the Proposed Development would remain a very small part of the wider view. With reference to **Appendix 7**, the change is predicted to range between neutral and negligible, with the effects ranging between **no change and negligible beneficial**.

11.0 RESPONSE TO POLICY

11.1 With the conclusions of the townscape and visual effects, the following sections sets out the Proposed Development's response to the relevant townscape and visual matters identified from the policy baseline review.

NATIONAL PLANNING POLICY FRAMEWORK, 2021

11.2 The Proposed Development is considered to respond positively to paragraph 124 by providing high quality regeneration to a Site which does not contribute positively to the townscape character.

11.3 The iterative design process and the assessment has included a number of area based character assessments and due to this analysis, the Proposed Development responds positively to NPPF paragraph 125.

11.4 The Proposed Development is assessed as reflecting local design policies and achieving a high quality design via the form and articulation of Block A and Block B, such that it helps to raise the design standards in the area.

11.5 The scale of the Proposed Development would fit with the overall form of the larger scale buildings of the Crest Building, opposite the Site and the perception of taller buildings bordering lower residential land uses, as defined by St Marks Tower and Perigon Heights. The articulation of the Proposed Development would achieve a 'well designed place' in townscape and visual terms, as demonstrated by

the range of predicted beneficial townscape and visual effects and the Proposed Development would integrate with the existing townscape character.

11.6 In the future baseline context, Bromley's skyline would be notably different via the implementation of the Development Zones, including the Churchill Quarter. In this context, the Proposed Development would be part of a larger extent of taller and staggered massing, such that whilst its impact is predicted to reduce, the Proposed Development would still result in beneficial townscape and visual effects.

11.7 Due to the above, the Proposed Development would respond positively to paragraph 126 in achieving well designed places, via the form, articulation and detailing of Block A and Block B.

11.8 As buildings of higher architectural quality than those on the Site and in the immediate context, the Proposed Development would improve the local townscape character. The height of the Proposed Development would not be uncharacteristic of the area, with Block B mirroring the height of the Crest Building on the opposite side of Ringers Road. Block A would be slightly taller than its surrounding context, but it would still form part of co-ordinated massing arrangement with the Crest Building and in the townscape and visual context of other tall buildings. The Proposed Development would therefore respond positively to NPPF policy 130 and 134.

11.9 Block A would form a focal point within views, similar to other tall buildings across Bromley's skyline, with St Marks Tower and the Churchill Theatre. The Proposed Development would therefore reflect its location in terms of being one of a number of taller buildings across the town centre and consolidated adjacent to the Crest Building. The Proposed Development would not adversely impact any designated townscape features nor designated views. As a result, the Proposed Development would respond positively to paragraph 174.

The London Plan, 2021

11.10 The Proposed Development responds positively to Policy D1, as the design process has been informed by local character assessments and a review of published studies. The TVIA has set out these differing characteristics via the identification of local townscape character areas with further analysis on their qualities and townscape value.

11.11 The Proposed Development is predicted to result in a range of beneficial townscape and visual effects and therefore enhances the local context in response to Policy D3.

11.12 The Proposed Development would be located in Development Zone 2 and adjacent to an identified location for a tall building. In response to Policy D4, the Proposed Development is responding to the BTCAAP and an established masterplan for the future development of the town centre. The Proposed Development is located in an area in which fundamental change is supported in policy terms.

- 11.13 The landscape design achieves a high quality and attractive space between Block A and Block B to accord with Policy D8.
- 11.14 The visual assessment has assessed the likely effects of the Proposed Development on close (immediate), mid and long range views from across the surrounding townscape.
- 11.15 The assessment has concluded that in close range views the materials and articulation across Block A and Block B would achieve a visual relationship with Ringers Road and Ethelbert Road. The height of Block A would achieve a transition in scale between Block B and the Crest Building, which already demarcates a change in building scales in relation to surrounding residential properties. In the future baseline context, the Proposed Development would continue to provide this relationship to the street and transition in scale with the Churchill Quarter massing, due to reflecting the scale and heights of the future massing.
- 11.16 In mid-range views the Proposed Development is assessed as introducing visual interest to the view via the stepped form of the roof and the transition in massing between the middle and upper parts of Block A and the stepped roof profile of Block B. The materials would create an attractive set of buildings, demonstrating high architectural design and quality, in proportion with other tall buildings in Bromley.
- 11.17 In the long distance views, the form of the Proposed Development would similarly make a positive contribution to the skyline due to its form and materials.
- 11.18 Due to the Proposed Development resulting in beneficial visual effects across close (immediate), mid and long range views, it would respond positively to Policy D9: Tall Buildings.
- London Plan, London View Management Framework (LVMF), 2012**
- 11.19 The Site is not within any of the LVMF view corridors and therefore would not impact these designated views.
- London Borough of Bromley, The Bromley Local Plan, adopted 2019**
- 11.20 The Proposed Development is located in an identified 'opportunity area' for new homes as part of the BTCAAP and therefore in townscape and visual terms, a part of the townscape which can accommodate change.
- 11.21 The Proposed Development would introduce two tall buildings. In respect of Policy 47: Tall Buildings, the Proposed Development is assessed as making a positive contribution to the townscape by its architectural quality, materials, articulation to the façade and form of the buildings. The Proposed Development is therefore assessed as responding positively to Policy 47 by introducing tall buildings of the 'highest architectural quality', supported by the use of materials which are appropriate to their location.
- 11.22 The visual assessment has concluded beneficial effects from a range of locations across the townscape, such that there would no adverse effects to identified important views.
- 11.23 In respect of Policy 48: Skyline, the Proposed Development would form part of the skyline, with the form of the building, including its stepped roof and materials assessed as enhancing the quality of views. The Proposed Development would not adversely impact views of existing landmarks or ridgelines.
- 11.24 In support of Policy 48: Skyline and the relationship to Historic England's Advice Note, the Proposed Development is 'high quality' as it has a 'positive' relationship with:
- Topography – via the stepped roof profile of Block A and Block B, both reflecting the alignment of the underlying falling landform from the High Street to Ravensbourne Road (from east to west), along with the stepped massing to the upper two storeys of Block B, stepping 'down' along Ethelbert Road, mirroring the underlying landform;
 - Character of Place – via local townscape character analysis and use of materials to reflect surrounding buildings, whilst introducing a higher architectural quality and form;
 - Heritage assets and their setting – via reducing the height and massing of the Proposed Development (Block B) in the direction of the Conservation Area;
 - Height and scale of development (immediate, intermediate and town- or city-wide) - which would provide visual interest and a focal point both in relation to the existing and future context, with beneficial effects predicted by the townscape and visual assessment;
 - Urban grain and streetscape – similar to the character of place, via an assessment of the local townscape character;
 - Important views including prospects and panoramas – via the Proposed Development retaining key views and not impacting panoramas from Crystal Palace, open spaces and views of landmark buildings; and
 - The impact on the skyline – via the visual assessment concluding that the form and articulation of the Proposed Development would provide visual interest and a positive features on the skyline, forming one of a number of taller buildings within Bromley in relation to the immediate context of the Crest Building and part of a wider arrangement of taller massing in relation to the future baseline.
- 11.25 In respect of the future baseline, the Proposed Development would be part of townscape consisting of taller massing, rather than one of a number of individual taller buildings on the skyline. The form and height of the Proposed Development are assessed as resulting in beneficial townscape and visual effects to this future baseline, such that the Proposed Development would integrate with the vision of the BTCAAP.

London Borough of Bromley, Bromley Town Centre Area Action Plan, 2010

- 11.26 The beneficial townscape and visual effects predicted for the Proposed Development are assessed as responding positively to the objective of the BTCAAP for future development to enhance Bromley.
- 11.27 As set out above in respect of other policies, the iterative design process has been informed by an analysis of local townscape character, including the BTCAAP analysis of townscape character area, so as to accord with Policy BTC2: Residential Development.
- 11.28 The materials, articulation and form of Block A and Block B area assessed as resulting in beneficial effects at the Site level and Bromley's local townscape character areas. This is due to the introduction of a high architectural quality building which achieves a strong relationship with the Ringers Road and Ethelbert Road and makes a positive contribution to the skyline. These features of the Proposed Development are also relevant to the future baseline context, with the Proposed Development responding positively to the Churchill Quarter massing.
- 11.29 Due to this, the Proposed Development is assessed as representing the highest standards of design with beneficial townscape and visual effects which would enhance the appearance of the town centre to accord with Policy BTC17: Design Quality.
- 11.30 The design of the intervening space between Block A and Block B would introduce a high quality public realm which accords with Policy BTC18: Public Realm.
- 11.31 The height of Block A and Block B has been assessed in relation to key views and vistas across the Borough, including from the town centre, the High Street and the Conservation Area in accordance with Policy BTC19. The visual assessment demonstrates that the Proposed Development would not adversely impact any of these identified views and would retain views of landmark buildings across Bromley, specifically the Churchill Quarter. This is through being situated at a lower position within the townscape and the heights of Block A and Block B not extending above the Churchill Quarter.

12.0 CONCLUSION

Existing Baseline

- 12.1 With reference to **Figure 1: Site Context Plan**, the Site comprises residential and commercial land uses within Bromley Town Centre, situated between Ethelbert Road and Ringers Road and is located in proximity to key interchanges and public routes across Bromley Town Centre.
- 12.2 Within the Site, the buildings are considered to be of limited architectural quality and as a result do not contribute positively to the townscape character and the Site's position within the townscape.
- 12.3 With reference to **Figure L02: Topography Plan**, the landform across the study area is undulating due to several valley systems and associated watercourses, resulting in a complex pattern of landform, defined by several ridgelines and lower lying valleys.
- 12.4 Land uses across the study area consist of extensive areas of residential suburbs, which form a dense amalgamated settlement pattern. Bromley town centre is the main retail and commercial focus of this assessment, although these land uses extend across all of the study area at a variety of scales.
- 12.5 Numerous open spaces extend across the study area, including several country parks, commons and more formal recreation via golf course. The Ravensbourne Valley forms part of these open spaces, extending from the south of Bromley town centre, across Church House Gardens and to the north-west of Bromley.
- 12.6 The vegetation patterns across the study area are varied due to the contrast between areas of common and woodland and town centres with extensive areas of buildings and associated road and infrastructure networks.
- 12.7 With reference to the London Borough of Bromley's Protected Tree Map²⁵, the Site is not covered by any Tree Preservation Orders (TPO), nor ancient woodland.
- 12.8 The Site is not crossed by any Public Rights of Way (PRoW). The High Street is pedestrianised to the north-east of the Site, from the junction of Ethelbert Road and Elmfield Road, northwards to the northern part of the town centre.
- 12.9 There are several formal and informal path networks across Church House Gardens, with access from the western end of Ethelbert Road. The routes across the gardens enable access to Glassmill Lane, and across Martin's Hill, as well as to the Churchill Theatre.

²⁵ London Borough of Bromley, Protected Tree Map, on-line, https://www.bromley.gov.uk/homepage/211/tree_preservation_orders_map

12.10 The Site is not covered by any statutory townscape designations nor is it within an Area of Residential Character. The Site is not located across any of the 'major skyline ridges' and nor is it identified as a 'landmark'.

12.11 Tall buildings in proximity to the Site and across Bromley town centre are the:

- Crest building, consisting of Henry House and William House (up to 11 storeys), on Ringers Road, opposite the Site;
- the Bank of America complex, consisting of three tall buildings on Elmfield Road;
- St Mark's Square (19 storeys) and characterised by an angled roof profile to the south of the Site;
- Perigon Heights, a range of tall buildings (7, 11 and 17 storeys) to the south of the Bromley South railway station;
- the Mall tower, to the east of the High Street, rising up from the shopping centre;
- the Glades; and
- The Churchill Theatre, to the north of the Site.

12.12 In close range views, the existing buildings within the Site are visible from along Ringers Road, Ravensbourne Road, Ethelbert Road and Ethelbert Close. These existing buildings are seen as part of the varied building styles which extend across landform which falls from the High Street to Ravensbourne Road. The composition of views is channelled due to the alignment of these roads, with the extent of views either truncated by the more elevated High Street or extending westwards across the residential suburbs. Neither of the existing buildings exhibit a visual interest due to their form and lack of architectural detailing.

12.13 In mid-range views, particularly to the west of the town centre, the more undulating pattern of landform enables a greater visibility of buildings across the town centre. The composition of the view consists of a consistent scale of residential properties in the foreground, with taller massing in the background of the view, in the town centre. This includes the Mall Tower, the Churchill Theatre and Crest Building, which extend above the skyline, such that views towards the Site are already characterised by tall buildings forming the background of the view

12.14 In long range views, including from the elevated terraces of Crystal Palace Park there are panoramic views which include Bromley. The upper parts of the Churchill Theatre, the Crest Building and St Marks Tower are visible, being consolidated within the overall extent of the view, such that views towards the Site are seen in this context.

Future Baseline

12.15 The Bromley Masterplan (the Stitch masterplan) proposes a new mixed use neighbourhood centre within Bromley Town Centre, extending to the south of the High Street, between the Churchill Theatre and Bromley South railway station.

12.16 The more relevant part of the masterplan in relation to the Site is the Churchill Quarter (Planning Application Ref: 18/02181/FULL1). This is located opposite the Site, extending from Ethelbert Road to the Churchill Theatre. A decision is still pending, but the application has extended beyond the determination period. With the implementation of the masterplan, the context to the Site will be fundamentally altered, with taller buildings across Bromley town centre.

Opportunities and Constraints

12.17 The opportunities for developing the Site in townscape and visual terms are that the Site:

- is not covered by any statutory landscape or townscape designations;
- is part of the BTCAAP Development Zones;
- is adjacent to an identified BTCAAP 'possible location for taller building' location;
- does not exhibit any rare or distinctive townscape features, such that the existing buildings do not contribute positively to the townscape and visual amenity;
- is at a key point within the townscape, demarcating the transition between Church House gardens and the High Street and the vehicular and pedestrianised parts of the High Street;
- is seen within the context of tall buildings in both close, mid and longer distance views which already extends above the skyline; and
- is between future baseline developments including the Churchill Quarter and therefore part of a townscape where the character and skyline could be fundamentally different in comparison to the existing context.

12.18 The constraints relating to development of the Site in townscape and visual terms are that:

- the Site is in close proximity to residential properties, both in terms of close range visibility and lower buildings height such that there would be close range changes in scale; however this is not uncharacteristic of the townscape, with taller residential land uses at the Crest Building, on the opposite side of Ringers Road. In the context of the future baseline, the Churchill Quarter massing would fundamentally alter this existing context;
- the Site is visible from several identified views within the Bromley Local Plan, but is seen in the context of other tall buildings and the design can provide a positive response to the skyline and townscape through its massing, form and articulation; and
- the Site is adjacent to a Conservation Area, which will require a high quality design to respond positively to the Conservation Area.

Tall Building Study

12.19 With reference to **Appendix 5** a Tall Building Study was undertaken to assess the potential massing and height of buildings within the Site.

12.20 The Tall Building Study concluded:

- In close range views, the taller heights to Block A and Block B would result in a more notable step change in scale in comparison to existing buildings along Ringers Road and Ethelbert Road.
- In mid to long distance views, both Block A and Block B would be visible and seen in the context of other tall buildings including the Churchill Theatre and the Crest Building on Ringers Road;
- Block A would establish a visual relationship with the Churchill Quarter between 14 to 19 storeys in height and increasing the building heights of Block A and Block B provides the opportunity for demarcating the Site and the transition between the High Street and Market Street as well as establishing a cluster of buildings around Block A;
- In mid-range views, from the northern parts of Bromley High Street, Block A would be visible between 7 and 19 storeys in height. Block A would reflect the existing composition of the view, by forming a focal point in the view and a taller building in comparison to those on the High Street, similar to the Crest Building and the upper part of St Marks Tower;
- In relation to the future baseline, the Churchill Quarter would introduce additional height and massing within the view and adjacent to the High Street. This would substantially reduce the visibility of Block B. Block A would remain visible, with the taller height of Block A, at 18 and 19 storeys, reflecting the height of the upper parts of the Churchill Quarter;
- Given the future baseline context of the Churchill Quarter, taller buildings heights for Block A and Block B would be appropriate in townscape and visual terms in establishing a logical and coherent link to the taller future baseline massing;
- Key to the successful integration of Block A and Block B will be the architectural detailing and materials, particularly the upper storeys of Block A to create a building form which reflects the more articulated buildings within the townscape, such as St. Marks Tower; and
- In the context of the proximity to the Crest Building and the future context of the Churchill Quarter, it is considered that tall buildings, can be successfully accommodated within the Site.

Likely Townscape Effects

12.21 At the Site level, the Proposed Development would replace the existing buildings and introduce new residential land uses and associated public realm. Block A and Block B would be taller than the existing buildings on Site and of a higher architectural quality, resulting in a high change to the townscape character. In relation to the low sensitivity of the Site, the effect is assessed as **moderate beneficial**.

12.22 The Proposed Development would be located in the BTCAAP 'Bromley Central character area'. The scale and form of the Proposed Development would reinforce the character area as the main core of Bromley and the contextual position of the transition between the High Street and Church House Gardens, as well as the proximity to the pedestrianised and vehicular parts of the High Street. The varied finishes to the ground floors of Block A and Block B would respond positively to the stated character area guidelines of 'encouraging active edges to the street frontages.' The lower height of Block B and the stepping down

in scale from Block A, would respond positively to the Conservation Area to the north and the transition in the character area to the vegetated grounds of Church House Gardens, in accordance with the guidelines to respond to these designations.

12.23 The change to the 'Bromley Central character area' is assessed as low. In relation to the medium sensitivity of the character, area the effect is assessed as **minor beneficial**.

12.24 With the future baseline and the implementation of the Churchill Quarter, the Proposed Development would be integrated into a townscape consisting of taller buildings. Block A would reflect the scale of the southern part of the Churchill Quarter, whilst the height of Block A would reflect the height of the northern part of the Churchill Quarter. The public realm within the Proposed Development would also provide co-ordinated linkages with the public realm across the Churchill Quarter. The impact of the Proposed Development is therefore assessed as low, given the alterations to the townscape that would have occurred and the effect is predicted as **negligible beneficial**.

Likely Visual Effects

Close Range Views (Immediate Views)

12.25 For residents on Ringers Road, Ethelbert Road and Ravensbourne Road, Block A would be visible, extending above the buildings on the north side of Ringers Road. The upper two storeys of Block B would also be visible, being set back from the alignment of Block A via the step in the building form. The composition of the view already includes tall buildings as focal points, both with the Crest Building and the Mall Tower. Block A and Block B would replicate this feature of the view. The building materials across Block A would provide visual interest whilst reflecting the brick of existing buildings along Ringers Road and the higher quality of the architectural form is assessed as enhancing the composition of the view.

12.26 For visitors and pedestrians on the High Street, to the north of the Site, Block A would be visible above the intervening buildings and extending above the Crest Building, which would remain visible. Block A would establish a stepped arrangement of massing, increasing in height from the TK Maxx building and across the Crest Building. The horizontal form to the roof of Block A would reflect the horizontal form of existing buildings along the High Street, including the roof line of no.44 High Street. The overall change to the view would be very small, with the channelled alignment along the High Street and the Churchill Theatre remaining the focal point to the view.

12.27 For recreational users in Church House Gardens the upper parts of Block A and Block B would be visible although largely softened by the intervening vegetation within the gardens.

12.28 For these close range receptors, including residents along Ethelbert Road and Ringers Road, and with reference to **Appendix 7**, the change from the Proposed Development would range between low and high and the effects would range between **minor and moderate beneficial**.

Mid-Range Views

- 12.29 From the recreational grounds across Martins Hill, to the north-west of the Site, the stepped arrangement to the upper storeys of Block B would be visible, being seen at the same height and scale as the Crest Building within the view. Block A and Block B would form part of the varied skyline which already consists of taller buildings above the tree line, via the Churchill Theatre, the Mall Tower, the Crest Building, Perigon Heights and St. Marks Tower.
- 12.30 From the residential areas to the west of the town centre, Block A and Block B would be visible in the background of the view, being seen adjacent to the Crest Building. The height of Block B would mirror that of the Crest Building, with the combination of the massing forming a consolidated arrangement of buildings, with Block A the taller element.
- 12.31 For receptors with mid-range views and with reference to **Appendix 7**, the change from the Proposed Development would range between neutral and moderate. The effects are predicted to range between **no change and minor beneficial**.

Long Range Views

- 12.32 From parks, open spaces and residential areas to the south-east and south of Bromley, the upper part of Block A would be barely visible in the background of the view, extending very slightly above the intervening residential properties and vegetation.
- 12.33 From the upper terraces of Crystal Palace, Block A and Block B would be visible, approximately 6.2km to the east of receptor. The Proposed Development would be seen situated between the Mall Tower and St Marks Tower, with views of the Churchill Theatre remaining. The height of Block A would reflect that of the Crest Building, remaining below the ridgeline in the background of the view, whilst also forming a consolidated massing between Block B and the Crest Building. At this distance the change to the view would be very small.
- 12.34 For these receptors with long range views the change to the view would range between neutral and low. The effects are predicted to range between **no change and negligible beneficial**.
- 12.35 With the future baseline, the composition of the view along Ethelbert Road would be substantially different to the existing view, via taller massing extending along the north side of the road.
- 12.36 The height of Block B would reflect the height of the Churchill Quarter massing. Block A would remain the taller building within the composition of the view, but would be seen as a part of the varied skyline, reflecting the rhythm in height across the Churchill Quarter massing and extending up from the combined massing of the Churchill Quarter and Block B.

12.37 From the High Street, Block A would form part of an arrangement of taller buildings extending adjacent to the High Street, between the Churchill Quarter and through to the Crest Building. The scale of Block A would reinforce this relationship of taller buildings, being set back from the High Street and retain the focus of taller buildings at the junction of the High Street and Elmfield Road.

12.38 The impact of the Proposed Development in relation to the future baseline would therefore reduce in comparison to the assessment against the existing context. The impact is assessed as ranging between neutral to moderate and the effects are predicted to range between **no change and minor beneficial**.

Response to Policy

12.39 The Proposed Development is assessed as responding positively to the NPPF requirements of undertaking a character based analysis and achieving a high quality design via the form and articulation of Block A and Block B, such that it helps to raise the design standards in the area.

12.40 In response to the London Plan, the Proposed Development is predicted to result in a range of beneficial townscape and visual effects and therefore enhances the local context in response to Policy D3.

12.41 In relation to the Bromley Local Plan, The Proposed Development is located in an identified 'opportunity area' for new homes as part of the BTCAAP and therefore in townscape and visual terms, a part of the townscape which can accommodate change.

12.42 In respect of Policy 47: Tall Buildings, the Proposed Development is assessed as making a positive contribution to the townscape by its architectural quality, materials, articulation to the façade and form of the buildings. The Proposed Development is therefore assessed as responding positively to Policy 47 by introducing tall buildings of the 'highest architectural quality', supported by the use of materials which are appropriate to their location.

12.43 The visual assessment has concluded beneficial effects from a range of locations across the townscape, such that there would no adverse effects to identified important views.

12.44 In respect of Policy 48: Skyline, the Proposed Development would form part of the skyline, with the form of the building, including its stepped roof and materials assessed as enhancing the quality of views. The Proposed Development would not adversely impact views of existing landmarks or ridgelines.

12.45 The beneficial townscape and visual effects predicted for the Proposed Development are assessed as responding positively to the objective of the BTCAAP for future development to enhance Bromley.

12.46 The Proposed Development is assessed as representing the highest standards of design with beneficial townscape and visual effects which would enhance the appearance of the town centre to accord with Policy BTC17: Design Quality.

12.47 The design of the intervening space between Block A and Block B would introduce a high quality public realm which accords with Policy BTC18: Public Realm.

12.48 The height of Block A and Block B has been assessed in relation to key views and vistas across the Borough, including from the town centre, the High Street and the Conservation Area in accordance with Policy BTC19. The visual assessment demonstrates that the Proposed Development would not adversely affect any of these identified views and would retain views of landmark buildings across Bromley.

Conclusion

12.49 The Proposed Development would be located in BTCAAP Development Zone 2 and adjacent to an identified 'possible location for a tall building'. The Site is therefore in a part of Bromley town centre in which fundamental change is supported in policy terms.

12.50 The materials, articulation and form of Block A and Block B are assessed as resulting in beneficial effects at the Site level and Bromley's local townscape character areas. This is due to the introduction of a high architectural quality buildings which achieve a strong relationship with the Crest Building on Ringers Road and makes a positive contribution to the skyline through the varied roof profiles.

12.51 The visual assessment has assessed the likely effects of the Proposed Development on close (immediate), mid and long range views from across the surrounding townscape as being beneficial due to the form of the Block A and Block B providing visual interest, the use of materials and articulation to the façade and the positive contribution to the skyline.

12.52 In respect of the future baseline of the Churchill Quarter, the Proposed Development would be part of townscape consisting of taller massing, rather than one of a number of individual taller buildings across Bromley town centre.

12.53 The form and height of the Proposed Development are assessed as resulting in beneficial townscape and visual effects to the existing and future baseline, such that the Proposed Development would integrate with both the existing and future baseline context.

12.54 Due to the above, the Proposed Development is assessed as being able to be successfully integrated within the townscape and visual context and accords with the vision of the BTCAAP to enhance Bromley town centre.

13.0 APPENDIX 1: TVIA METHODOLOGY

13.1 The assessment methodology follows the best practice principles for assessing townscape and visual effects recommended by the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 2013 (GLVIA 3).

13.2 Townscape and Visual Impact Assessments (TVIAs) are undertaken by professionals who are also typically involved in the design of the landscape and the preparation of landscape strategies and management proposals. This can allow the assessment to proceed as an integral part of the overall scheme design. Judgements are based on training and experience, and supported by evidence and reasoned argument.

13.3 In accordance with the GLVIA 3, the following distinct but related assessments are undertaken within a TVIA:

- Assessment of townscape effects – assessing effects of the Proposed Development on the townscape as a resource (i.e. changes to physical elements/features of the townscape and/or the aesthetic, perceptual and experiential characteristics that make different townscapes distinctive); and
- Assessment of visual effects – assessing effects of the Proposed Development on the views available to people and their visual amenity (i.e. changes in the context and character of views as a result of the change or loss of existing elements of the landscape and/or the introduction of new elements).

13.4 A TVIA typically involves the following key steps:

- Baseline studies – establishing the existing townscape and visual conditions within the Site and the wider study area against which the effects of the Proposed Development are assessed.
- Assessment of effects – systematically assessing the potential townscape and visual effects of the Proposed Development, including whether they are adverse or beneficial.
- Mitigation – identifying measures to avoid/prevent, reduce or offset/remedy adverse potential townscape and visual effects.
- Residual effects – identifying the likely residual landscape and visual effects of the Proposed Development taking into account the proposed mitigation measures.

STUDY AREA

13.5 The townscape study area extends 0.75 kilometres (km) from the Site, to cover parts of Bromley town centre, surrounding residential land uses and areas of open space.

13.6 The visual study area extends 7 kilometres (km) from the Site to cover elevated land at Crystal Palace Park to the west of the Site.

13.7 Whilst in some instances, the Proposed Development may be perceived beyond these study areas, it is assessed that beyond 2km there would be no townscape effects due to the combination of distance, landform, vegetation and the perception of existing settlements and infrastructure. Similarly, there would be no visual effects beyond the 7km study area, due to the distance and intervening features.

13.8 The study area is therefore considered proportionate for the assessment of townscape and visual effects in relation to the Proposed Development.

Limitations and Assumptions

13.9 The TVIA undertakes an assessment of the Proposed Development at year 1 of operation in relation to the existing context ('baseline') and an assessment in relation to a future baseline, based on the assumption that the Churchill Quarter and S2 development is implemented.

13.10 Both these assessments are undertaken during winter to demonstrate a 'worst case' scenario as the existing deciduous vegetation is not in leaf and therefore the visibility towards the Site is greater than in summer months.

13.11 The TVIA fieldwork has been undertaken from publicly accessible locations, i.e. Public Rights of Way (PRoW) or pavements adjacent to residential properties. As viewpoint photography has not been undertaken from private properties, professional judgement has been used to assess the potential impacts and effects to these receptors.

13.12 The assessment is based on the drawings for determination.

ASSESSMENT OF TOWNSCAPE EFFECTS

Townscape Receptors

13.13 The character within the Site and the wider study area are recorded to provide a baseline against which the effects of the Proposed Development can be assessed. The assessment adopts the broad and inclusive European Landscape Convention (ELC) definition of landscape character embracing both rural and urban landscapes.

13.14 The character of the townscape is recorded by reference to relevant published landscape character assessments, desk-top analysis and field surveys.

13.15 Townscape receptors are defined aspects of the landscape resource that have the potential to be affected by a proposal. Townscape receptors may include:

- National and local landscape/townscape designations (e.g. Areas of Outstanding Natural Beauty, Areas of High Landscape Value and Areas of Attractive Landscape);
- Landscape/townscape character areas as identified within published guidance; and

- Landscape/townscape features that contribute to landscape/townscape character.

13.16 The **sensitivity** of the townscape receptor is a combination of its **value** and **susceptibility** described below:

Townscape Value

13.17 Townscape value is defined as the relative value attached to different landscapes/townscapes by society as set out below in Table 12.1.

Table 12.1: Townscape Value Assessment Criteria

Value	Definition
High	Designated townscape of high value in a national / local context by virtue of its good condition, high scenic qualities and strong sense of place due to its special cultural and natural heritage quality.
Medium	Undesignated townscape of moderate value in a local context by virtue of its moderate condition, local scenic qualities and locally distinctive sense of place/perception.
Low	Townscape of limited value by virtue of its poor condition, limited scenic qualities and lack of local distinctiveness.

Townscape Susceptibility

13.18 Townscape susceptibility is the ability of a defined landscape/townscape to accommodate the type of change that would result from a particular type of development without undue negative consequences (as defined by GLVIA 3).

13.19 The criteria for assessing townscape susceptibility is based on a three point scale as set out in Table 12.2 below.

Table 12.2: Townscape Susceptibility Assessment Criteria

Susceptibility	Definition
High	A townscape that has a very limited ability to accommodate the changes that would result from the type of development proposed without adversely changing its essential character / overall integrity.
Moderate	A townscape that has the ability to accommodate some degree of the changes that would result from the type of development proposed without adversely changing its essential character / overall integrity.
Low	A townscape that is robust or tolerant to accommodating the changes that would result from the type of development proposed, which would have limited effects on its essential character / overall integrity.

13.20 Criteria that may be taken into consideration in the assessment of townscape susceptibility include landform, pattern / complexity, composition, landcover and the relationship of a given townscape area to existing settlements or developments.

Townscape Sensitivity

13.21 Assessing the sensitivity of townscape receptors combines judgements of the value attached to the townscape with its susceptibility to the type of change or development proposed, as set out above.

13.22 The criteria for assessing townscape sensitivity is based on a three point scale, as set out within Table 12.3.

Table 12.3: Townscape Sensitivity Assessment Criteria

Sensitivity	Definition
High	Typically a townscape that is of high value and high susceptibility to relatively small changes. For example, a designated townscape of good condition with high scenic qualities and strong sense of place with a very limited ability to accommodate change without adversely changing its essential character / overall integrity.
Medium	Typically a townscape that is of medium value and moderate susceptibility to some degree of change. For example, an undesignated townscape of moderate condition and local scenic qualities that has the ability to accommodate some degree of change without adversely changing its essential character / overall integrity.
Low	Typically a townscape of low value and low susceptibility to more substantial changes. For example, a townscape of poor condition and limited scenic qualities and poor condition, tolerant to accommodating changes which would have limited effects on its essential character / overall integrity.

ASSESSMENT OF TOWNSCAPE CHANGE

Assessing the Change (Magnitude of Townscape Impacts)

13.23 The change (magnitude of a townscape impact) is defined as the degree of change to townscape features or characteristics that will result from the introduction of the Proposed Development. The key factors which may influence the magnitude of impact are:

- The extent of the Proposed Development;
- The relationship and distance of the Proposed Development to adjoining landscapes/townscapes and the wider townscape context;
- The degree to which townscape character features will be changed by the Proposed Development;
- Whether impacts are short (less than 5 years), medium (5-10 years) or long term more than 10 years); and
- Whether effects are permanent or temporary.

13.24 The criteria for assessing the magnitude of townscape impacts is based on a five point scale as set out in Table 12.4 below.

Table 12.4: Townscape Change Criteria

Change (Magnitude)	Definition
High	Typically, the Proposed Development would result in the extensive loss and/or alteration and/or addition of key townscape characteristics and features. The change to the townscape character would be fundamental, permanent and long term and may cover an extensive area.
Moderate	Typically, the Proposed Development would result in some loss and/or alteration and/or addition of key townscape characteristics and features. The change to the townscape character would be partial and long term and may cover a limited area.
Low	Typically, the Proposed Development would result in a slight loss and or alteration and or addition of key townscape characteristics and features. The change to the townscape character would be slight and may be short term and may cover a more limited area.
Negligible	Typically, the Proposed Development result in only very minor loss and or alteration and or addition of key townscape characteristics and features.
Neutral	There would be no change to the townscape character.

ASSESSING TOWNSCAPE EFFECTS

13.25 Table 12.5 below sets out a matrix as a guide to the combination of sensitivity and change (magnitude), in order to establish the townscape effect, in combination with professional opinion. Where professional opinion concludes that the effect differs from the below guide, then a reasoned explanation is provided in the assessment narrative.

Table 12.5: Townscape Effects

		Sensitivity		
Criteria		High	Medium	Low
Magnitude	High	Major or Moderate	Major or Moderate	Moderate or Minor
	Moderate	Major or Moderate	Moderate or Minor	Minor
	Low	Moderate or Minor	Moderate or Minor	Minor or Negligible
	Negligible	Minor or Negligible	Minor or Negligible	Negligible or No Change
	Neutral	No Change	No Change	No Change

13.26 The definition of the townscape effects are set out in Table 12.6 below.

Table 12.6: Townscape Effects Assessment Criteria

Effect	Definition
Major Adverse	Typically, the Proposed Development would result in considerable deterioration of the quality and integrity of the townscape.
Moderate Adverse	Typically, the Proposed Development would result in a partial deterioration of the quality and integrity of the townscape.
Minor Adverse	Typically, the Proposed Development would result in a slight deterioration of the quality and integrity of the townscape.
Negligible Adverse	Typically, the Proposed Development would result in a very slight deterioration of the quality and integrity of the townscape.
No Change	The Proposed Development would result in no discernible change to the character and quality of the townscape.
Negligible Beneficial	Typically, the Proposed Development would result in a very slight improvement to the quality and integrity of the townscape.
Minor Beneficial	Typically, the Proposed Development would result in a slight improvement to the quality and integrity of the townscape.
Moderate Beneficial	Typically, the Proposed Development would result in a partial improvement to the quality and integrity of the townscape.
Major Beneficial	The Proposed Development would result in a considerable improvement to the quality and integrity of the townscape.

ASSESSMENT OF VISUAL EFFECTS

Visual Analysis and Viewpoint Mapping

13.27 The potential visibility of the Site is established through desk top studies, through a review of existing landform, vegetation and settlement patterns.

13.28 Taking into account the visibility mapping and the location of visual receptors within the study area, a range of representative viewpoint locations from which views of the Site may be possible are selected. These include short, mid and long distance views.

Zone of Theoretical Visibility Mapping

13.29 The Zone of Theoretical Visibility (ZTV) mapping has been produced via ArcGIS online, which extrapolates the height of the Proposed Development in relation to DEM topographical mapping, which does not include buildings or vegetation, such that it is a 'bare-earth' model. ArcGIS then enables an observer point to be placed in the model, from which a viewshed is then generated between the observer point and the top of the Proposed Development (Block A and Block B) to create the ZTV mapping.

Identification of Receptors

13.30 Visual receptors are individuals and/or defined groups of people who have the potential to be affected by a proposal. For the purposes of the assessment, the following visual receptors are considered:

- Users of public rights of way and public open spaces (including Country Parks and Access Land where relevant);
- Visitors to public viewpoints;
- People engaged in outdoor sport or at work;
- Residential properties; and
- Vehicular travellers.

Value of the View

13.31 The criteria for assessing the value of views is based on a three point scale as set out in Table 12.7 below.

Table 12.7: Value of Views Assessment Criteria

Value	Definition
High	View from a location that is likely to be of national importance, where the view forms part of the experience, and is likely to be experienced by a high number of people. Locations could include nationally designated landscapes / tourist destinations of national/regional importance / historic parks/gardens with designed vistas and views / National Trails and other promoted trails of regional importance.
Medium	View from a location that is likely to be of local importance, either designated or with cultural associations, where the view obtained forms part of the experience, and is likely to be experienced frequently by high numbers of people.

Value	Definition
	Or locations which could include local public rights of way with evidence of regular use / public open spaces / residential areas / local transport routes.
Low	View from a location that is not designated, with minimal or no cultural associations, where the view is unlikely to be frequently experienced by a number of receptors. Locations could include recreational routes/areas, residential areas or transport routes experienced by a low number of people.

Susceptibility of Visual Receptors

13.32 The susceptibility of visual receptors to changes in their views and general visual amenity typically depends on the activity or expectations of people experiencing the view, and the extent to which their attention is likely to be focused on the view.

13.33 The criteria for assessing the susceptibility of visual receptors to change is based on a three point scale as set out in Table 12.8.

Table 12.8: Susceptibility of Receptors Assessment Criteria

Susceptibility	Definition
High	Receptors with high susceptibility to changes in views that would result from the Proposed Development where the primary enjoyment/amenity value comes from the contribution that views of the surroundings make, such as: <ul style="list-style-type: none"> Residents at home; People engaged in informal outdoor recreation activities directly related to the visual setting (e.g. users of country parks, promoted trails/ public rights of way and historic parks and gardens); Visitors to public scenic viewpoints.
Moderate	Receptors with moderate susceptibility to changes in views that would result from the Proposed Development, such as: <ul style="list-style-type: none"> Visitors to tourist attractions or cultural landmarks where views of the surroundings contribute to the experience; Cyclists or recreational users, or scenic route where views of the surroundings contribute to the experience.
Low	Receptors with limited susceptibility to changes in views that would result from the Proposed Development where views of the surroundings form an incidental contribution to the experience of the activity being undertaken, such as: <ul style="list-style-type: none"> Areas of formal outdoor recreation activities (e.g. football, rugby, children's play areas); Main road and rail users; People at their place of work whose attention is focused on their work and the visual setting is not considered to contribute to the quality of working life.

Sensitivity of Visual Receptors

13.34 Assessing the visual sensitivity of receptors combines judgements of the value attached to the view with the susceptibility of the receptor to the type of change or development proposed.

13.35 The criteria for assessing visual sensitivity is based on a three point scale as set out in Table 12.9 below.

Table 12.9: Visual Sensitivity of Receptors Assessment Criteria

Sensitivity	Definition
High	Typically, a view of high value experienced by receptors of high susceptibility to relatively small changes in the view.
Medium	Typically, a view of medium value experienced by receptors of moderate susceptibility to some degree of changes in the view.
Low	Typically, a view of low value experienced by receptors of low susceptibility to more substantial changes in the view.

ASSESSMENT OF VISUAL CHANGE

Assessing the Visual Change (Magnitude of Impact)

13.36 The visual change (magnitude) is defined as the degree of change in a view that will result from the introduction of the Proposed Development. The key factors which may influence the magnitude of impact are:

- the distance between the Proposed Development and the receptors;
- the prominence of the Proposed Development in views;
- the extent of the Proposed Development visible and the extent of the view being occupied by the Proposed Development;
- the backdrop and foreground within the view;
- whether effects are short, medium or long term; and
- whether effects are permanent or temporary.

13.37 The criteria for assessing the visual change is set out in Table 12.10 below.

Table 12.10: Visual Change (magnitude) Criteria

Magnitude	Definition
High	Typically, the Proposed Development would be a very visible feature and have a large-scale change to the view, resulting in a pronounced / complete change / contrast to the existing view. The change may be permanent and long-term.
Moderate	Typically, the Proposed Development would be visible and have a medium-scale change to the view, resulting in a noticeable change / contrast in the view. The change may be permanent or temporary/short-term.
Low	Typically, the Proposed Development would appear as only a minor and not visually prominent component, resulting in an unobtrusive change / small-scale contrast in the view. The change may be permanent or temporary/short-term.
Negligible	The Proposed Development would not be very discernible or have a very small change to the view, resulting in a barely perceptible change in the view. There would be no fundamental change to the viewing experience. The change may be permanent or temporary/short-term.
Neutral	There would be no change to the view as the Proposed Development would not be visible.

ASSESSING THE VISUAL EFFECTS

13.38 Table 12.11 below sets out a matrix as a guide to the combination of sensitivity and change (magnitude), in order to establish the effect, in combination with professional opinion. Where professional opinion concludes that the effect differs from the below guide, then a reasoned explanation is provided in the assessment narrative.

Table 12.11: Visual Effects

		Sensitivity		
Criteria		High	Medium	Low
Magnitude	High	Major or Moderate	Major or Moderate	Moderate or Minor
	Moderate	Major or Moderate	Moderate or Minor	Minor
	Low	Moderate or Minor	Moderate or Minor	Minor or Negligible
	Negligible	Minor or Negligible	Minor or Negligible	Negligible or No Change
	Neutral	No Change	No Change	No Change

13.39 The definitions of the visual effects are set out in Table 12.12 below.

Table 12.12: Visual Effects Assessment Criteria

Effect	Definition
Major Adverse	Typically, changes to a view resulting from the Proposed Development that would result in pronounced deterioration to the view.
Moderate Adverse	Typically, changes to a view resulting from the Proposed Development that would result in a partial deterioration to the view.
Minor Adverse	Typically, changes to a view resulting from the Proposed Development that would result in a slight deterioration to the view.
Negligible Adverse	Typically, changes to a view resulting from the Proposed Development that would result in a very slight deterioration to the view.
No Change	No change to the view.
Negligible Beneficial	Typically, very small scale improvements to a view resulting from the Proposed Development that would result in very slight benefits to the view.
Minor Beneficial	Typically, small scale improvements to a view resulting from the Proposed Development that would result in slight benefits to the view.
Moderate Beneficial	Typically, medium scale improvements to a view resulting from the Proposed Development that would result in partial improvements to the view.
Major Beneficial	Typically, large scale improvements to a view resulting from the Proposed Development that would result in substantial improvements to the view as experienced.

14.0 APPENDIX 2: LOCAL TOWNSCAPE CHARACTER TYPES AND AREAS

14.1 With reference to **Figure L03**, the following local townscape character types (LTCT) and local townscape character areas (LTCA) have been identified across the study area to provide a further level of detail to the published studies. The analysis concludes with a judgement on the sensitivity of the LTCA's based on an analysis of their value and susceptibility.

LTCT 1: Bromley

14.2 This character type covers the town centre and residential land uses across the study area which combine to form Bromley. The pattern of the townscape is strongly related to the underlying landform, with the High Street orientated north to south and across rising landform, between the lower lying Bromley South and the elevated Market Square.

14.3 The High Street and town centre consist of a range of building styles and heights, including several tall buildings via Churchill Theatre, The Mall Tower, Crest Building, the Glades, buildings adjacent to Elmfield Road, St Marks Tower and Perigon Heights.

14.4 Open Space is located primarily across the western part of the LTCT, via Church House gardens and Martin's Hill.

14.5 The High Street and open spaces are bordered by a dense pattern of residential land uses, which whilst consisting of range of properties (Victorian, Edwardian, intra war and modern) is generally consistent at two storeys in scale.

LTCA 1: Residential Town Centre

14.6 This area consists of residential land uses to the west of Bromley High Street covering Ethelbert Road, Ringers Road, Ethelbert Close and Ravensbourne Road. The character area is situated across an underlying pattern of falling landform, away from the High Street, to a lower lying plateau along the alignment of Ravensbourne Road.

14.7 The properties are mainly Victorian, with some modern apartments, but overall the buildings range between 2 to 4 storeys in height. The road pattern is either cul-de sacs or through roads, with one-traffic management. Properties are set back from the roads to enable small front gardens and on street parking.

14.8 There is an abrupt transition between the residential character across LTCA 1 and its proximity to the High Street.

LTCA 2: Bromley High Street South (covers the Site)

14.9 This area covers the vehicular part of the High Street, from Bromley South railway station to Elmfield Road. The area also extends to the east and west of the High Street to cover retail and commercial land uses, including the Site.

14.10 Buildings range between 2 to 5 storeys in height, with most ground floors consisting of retail land uses with glass fronted facades. The majority of the buildings are 20th century and there are several locally listed buildings of Townscape Merit.

14.11 The combination of pedestrians and vehicles along the High Street results in high levels of movement and associated noise.

14.12 The area is situated across an underlying pattern of falling landform across the High Street, from the elevated Elmfield Road to the lower lying Bromley South railway station.

14.13 The combination of the width of the High Street and the buildings adjacent to the High Street means that views are limited to the east and west of the High Street, apart from at the junction with adjoining streets.

14.14 The Site is to the west of the High Street, adjacent to the TK Maxx building. The area does not have any public open space and the general quality of the public realm is considered to be low, due to generic pavements and limited street trees.

LTCA 3: Bromley High Street North

14.15 This area covers the pedestrianised part of the High Street, extending from the north of Elmfield Road.

14.16 The building style across the area is varied, between two to eight storeys in height, with the taller buildings generally on the western side of the High Street.

14.17 With the area, the Churchill Theatre is noted as a 'landmark building' and as demonstrated by the visual appraisal, its geometric form is visible from a number of locations across the study area, due to its height and that it is situated in an elevated position.

LTCA 4: Church House Gardens and Martin's Hill

14.18 Church House Gardens covers approximately 11 acres and consist of several features at varying levels, reflecting the pattern of underlying landform.

14.19 In the southern and lower lying parts of the gardens there are tennis courts and a children's play area.

14.20 In the central part of the gardens is a large lake and amphitheatre, which rises to a formal garden, including a paved area with a stone balustrade in the northern part of the gardens.

14.21 The combination of the varied landform and extent of vegetation result in differing perceptions and inter-visibility with the town centre.

14.22 From the northern and more elevated parts of the gardens, the upper parts of the Churchill Theatre skyline are visible, whilst from the central parts, the extent of vegetation results in a more enclosed character. From the southern part of the gardens, there is an increased perception of the town centre, due to the more formal recreational land uses and the inter-visibility with Ethelbert Road and Henry House.

14.23 Martin's Hill is similarly situated across elevated and undulating landform in the north, which falls to form a generally flat and low lying area in the south. The northern part of Martin's Hill is more wooded than the southern part and also contains the Bromley War Memorial.

14.24 There is a high recreational value to these parts of the townscape, along with inter-visibility of tall buildings within Bromley, including St Marks and the Churchill Theatre.

14.25 The LTCA is also part of the Bromley Town Centre CA and Shortlands Village CA.

LTCA 5: The Glades

14.26 This area covers the indoor retail area and associated car-parking on the east side of the High Street. The Glades is a large scale retail area, which was built in 1991.

LTCA 6: Queens Gardens

14.27 Queens Gardens consists of ornamental planting and mature trees. The area a set of grade II listed 19th century iron gates that at one time served Plaistow Lodge. There is high degree of inter-visibility with The Glades, but the relative tranquillity of the gardens is high.

LTCA 7: Civic Centre

14.28 This area covers the Bromley Council Civic Centre, which covers the Old Palace.

14.29 These buildings are set in a mid-19th century landscaped garden featuring artificial rockwork (Pulhamite) which results in a contained character, its extent defined by walls and mature vegetation.

LTCA 8: Elmfield Commercial

14.30 This area is characterised by tall commercial buildings, above 10 storeys in height, bordering Elmfield Road and bounded by Kentish Way to the east, the railway to the south and retail units and shopping centre to the west and north.

14.31 Buildings are faced generally in brick and are situated above the surrounding public realm by a buttress style plinth, often which contain related plant rooms for the buildings. The scenic quality of the public

realm is weak, due to the pavements and no articulation between the buildings and transition to the public realm.

LTCA 9: St Marks and Perigon Heights

14.32 The area is located to the southern part of the town centre and to the south of the railway line. There is a range of architectural styles, ranging between two storey semi-detached properties to the taller contemporary Perigon Heights and St Marks Tower, which are tall apartments. The area contains some St Mark's Church and the Former St Mark's School (grade II).

LTCA 10: Bromley East Residential

14.33 The area is located to the east of the A21 Kentish Way. The residential pattern consists mainly of two storey terraced properties, rendered white and often with black mock timber frames. There is both on street and off-street parking.

14.34 From parts of the area there is inter-visibility with taller buildings in Bromley Town Centre, including St Marks, taller buildings adjacent to Elmfield Road and the Mall Tower.

LTCA 11: Bromley South Residential

14.35 The area is located to the south west of the railway line. Buildings consist of early 20th century housing, with some later infill to the east. These predominantly comprise two to three storey semi-detached houses with front and back gardens, and some apartment blocks.

LTCA 12: Bromley West Residential

14.36 This area boundaries of this character area are defined by the open space of Church House Gardens and Open Space to the north and east, and the railway line to the south and west.

14.37 Development in the character area comprises late 19th century semi-detached and terraced residential houses set over 2 storeys. These have a suburban character adjacent to the public amenity space of the park, which creates a sense of enclosure.

LTCA 13: Bromley North

14.38 This covers the commercial and residential land uses in the northern part of Bromley.

LTCA 14: Bromley South Rail Corridor

14.39 This covers the railway line and Bromley South railway station in the southern part of Bromley. The rail infrastructure results in a notable contrast to the surrounding residential land uses, with the railway itself causing severance in the townscape.

14.40 There are several locations where the rail corridor is crossed by pedestrian and vehicular bridges which provides localised height in the townscape.

15.0 APPENDIX 3: VISUAL BASELINE

- 15.1 The following section sets out an analysis of the representative views and should be read in combination with the photographs.
- 15.2 **Viewpoint 1** is taken from Ravensbourne Road and is representative of residents. The photograph demonstrates that views are channelled along Ringers Road, to culminate with a channelled view of Bromley High Street. The Site (Block A) is visible towards the background of the view. Ringers Road is bordered by buildings of varying heights and styles, which step up in height towards the High Street. The Crest Building, on the south side of Ringers Road and opposite the Site is the tallest building, with the Mall Tower visible in the background of the view. There are no longer distance views to the rising landform and buildings along the High Street. With the future baseline, the BTCAAP Development Zone 2 would be in the foreground of the view, extending either side of Ringers Road.
- 15.3 Remaining on Ravensbourne Road, **Viewpoint 2** is taken from the 'junction' of Ravensbourne Road and Ethelbert Road and is representative of residents on Ravensbourne Road and recreational users exiting Church House Gardens, which is to the left of the view. The view demonstrates that the channelled composition of views, extending along Ethelbert Road and Ravensbourne Road. The difference in the views, is that those along Ethelbert Road are across rising landform and culminate at Bromley High Street, whereas views along Ravensbourne Road are across low lying and generally flat landform, culminating in St Marks Tower. The composition of views is therefore already characterised by a range of architectural styles and heights, with a notable step change in height between properties adjacent to Ravensbourne Road and St Marks Tower. The Site (Block B) is visible, towards the background of the view, in a more elevated position on Ethelbert Road. With the future baseline, the BTCAAP Development Zone 1 (including the Churchill Quarter) would be on the left side of Ethelbert Road and Zone 2 would be on the right side.
- 15.4 Moving along Ethelbert Road, towards the High Street, **Viewpoint 3** is taken from Ethelbert Close and is representative of residents. The photograph demonstrates that there are channelled and close range views of the Site (Block B). The properties along Ethelbert Road, including the existing building in the Site, are of a relevantly consistent scale and height. The upper parts of the Crest Building, including the angled roof, is visible above the properties on Ethelbert Road, but views are short range in distance. With the future baseline, the location of the viewpoint would be future residents, with BTCAAP Development Zone 2 on the opposite side of Ethelbert Road.
- 15.5 From viewpoint 3 and continuing east and across the High Street, **Viewpoint 4** is taken from the junction of Elmfield Road and the High Street. The view is representative of visitors to Bromley Town Centre. The photograph demonstrates that the junction is bordered by a range of building styles and heights, with the uniform façade of TK Maxx adjacent to the more articulated façade of 66-70 High Street. There are channelled views of the buildings adjacent to the upper part of Ethelbert Road, including the Site (Block B). The upper part of St Marks Tower is visible along with the angled roof of the Crest Building are visible, but form a very small component of the view. The key feature is that this part of the High Street, which demarcates the change between pedestrianised and vehicle use is not reflected in the form and scale of surrounding buildings. In the future baseline, the BTCAAP Development Zone 1 (including the Churchill Quarter) would be to the right (north) of Ethelbert Road, with Development Zone 2 covering the buildings to the left (south) of Ethelbert Road.
- 15.6 Remaining on Elmfield Road, **Viewpoint 5** is taken further from the High Street, at one of the entrances to The Glades. The view is representative of visitors to Bromley. The view is channelled by the scale of The Glades and buildings to the left (south) of Elmfield Road. The Site (ground level) is not visible due to the alignment of Elmfield Road which in turn truncates longer distance views. The upper parts of the Mall Tower are visible to the south of Elmfield Road. In the future baseline, the BTCAAP Development Zone 1 (including the Churchill Quarter) would be to the right (north) of Ethelbert Road.
- 15.7 Returning to Bromley High Street, **Viewpoint 6** is taken opposite to no.44 High Street and is representative of visitors to Bromley. The view demonstrates that this part of the High Street is characterised by a generally consistent scale of 4 storey buildings adjacent to the High Street. The articulation to these is varied, with brick and pitched roof buildings along with steel and glass and the utilitarian massing of TK Maxx. The upper parts of the Crest Building, including the angled roof is visible beyond these buildings, such that there is an existing transition in scale between lower buildings on the High Street and taller buildings beyond. The Site (ground) is not visible due to the intervening vegetation. In the future baseline, the BTCAAP Development Zone 2 would be visible, on the opposite side of the road.
- 15.8 From the southern part of the High Street, **Viewpoint 7** is taken from adjacent to Bromley South railway station and is representative of visitors to Bromley. The view demonstrates the rise in the underlying landform across the High Street and generally consistent scale of buildings adjacent to the road. St Marks Tower is visible, which along with no.44 High Street form taller and larger buildings in comparison. The alignment of the High Street and buildings truncate any longer distance views. The Site (ground) is not visible due to the intervening buildings. In the future baseline, BTCAAP Development Zones 2 and 3 would be visible on the opposite side of the road.
- 15.9 Moving west from the railway station, **Viewpoint 8** is taken from the railway bridge, which provides access between Ravensbourne Road and Queen Avenue. The view is representative of visitors to Bromley and is also identified as a key view within the Bromley Town Centre Area Action Plan. The bridge is enclosed by a mesh, but notwithstanding this, there of buildings within the central and southern parts of Bromley High Street, including the Churchill Theatre, the Crest Building and St. Marks Tower. The view demonstrates that these building result in height to the townscape from this location, with a variety of

- building forms and roof profiles and that the town centre is punctuated by taller buildings. The Site (ground) is not visible. In the future baseline, the BTCAAP Zones 1, 2 and 3 would be visible across Bromley Town Centre.
- 15.10 **Viewpoint 9** is taken from Ridley Road, to the west of viewpoint 8. The view is representative of residents. The view demonstrates that taller buildings across Bromley Town Centre are visible, including the staggered roof profile of the Crest Building, the upper parts of the Mall Tower and St Marks Tower. The Site (ground) is not visible due to the intervening buildings. The composition of the view therefore consists of a notable change in scale between buildings within the view. With the future baseline, the BTCAAP Development Zones, 1, 2 and 3 would be visible.
- 15.11 **Viewpoint 10** is taken from the southern part of Church House Gardens and is representative of recreational users. The Site (ground) is not visible due to the intervening buildings, but views extend across properties on Ethelbert Road to the upper parts of the Crest Building and its stepped form. The composition of the view therefore consists of taller buildings bordering the gardens.
- 15.12 Moving northwards across the gardens, **Viewpoint 11** is taken from the Churchill Theatre plaza and is representative of recreational users and visitors to the theatre. The proximity of the retaining wall and vegetation truncates longer distance views across the townscape. The Site (ground) is not visible. In the future baseline, BTCAAP Development Zone 1 would be visible.
- 15.13 **Viewpoint 12** is taken from Bromley High Street, in proximity to the Churchill Theatre and is representative of visitors to Bromley. The view demonstrates the channelled composition of the view due to the proximity of the buildings adjacent to the High Street and that the upper part of St Marks Tower and the Crest Building are visible in the background of the view. The height of these buildings forms a notable contrast with the scale of buildings along the High Street and demonstrates that these taller buildings are focal points within the view. The Site (ground) is not visible. In the future baseline, BTCAAP Development Zones 1 and 2 would be visible.
- 15.14 Moving north, along the High Street, **Viewpoint 13** is taken from the junction of Market Street and the High Street and is representative of visitors to Bromley. The view demonstrates that there is a similarly channelled composition to the view, due to the alignment of the High Street and the proximity of the buildings. St. Marks Tower and the Crest Building form focal points within the view and demonstrate that the composition of the view is defined by the transition in scale between the buildings adjacent to the High Street and those across the wider townscape. The Site (ground) is not visible due to the intervening buildings. In the future baseline, BTCAAP Development Zones 1 and 2 would be visible.
- 15.15 **Viewpoint 14** is taken from the junction of Church Road and Tetty Way and is representative of visitors to Bromley and the Church of St Peter and St Paul. The view demonstrates the contrast in building materials, between the flint façade of the Church and the brick of surrounding materials. The Church is the focal point of the view, with its nave and tower being visible, along with the vegetated grounds. The skyline beyond the Church is also free from development. The Site (ground) is not visible due to the intervening buildings and distance. In the future baseline, the BTCAAP Development Zone 1 would be screened by the intervening vegetation.
- 15.16 Moving to the west of the Church, **Viewpoint 15** is taken from within the grounds of Church House Gardens and is representative of visitors to Bromley and the Church, as well as recreational users of the gardens. The Site (ground) is not visible due to the intervening vegetation, which forms the foreground of the view. There are largely filtered views of the upper parts of the Crest Building in comparison to the Churchill Theatre, which is visible and establishes a visual relationship between the gardens and the town centre. In the future baseline, the upper parts of BTCAAP Development Zone 1 would be visible.
- 15.17 **Viewpoint 16** is taken from Martin's Hill, to the north-west of the gardens and is representative of recreational users and visitors to the Bromley War Memorial. The viewpoint is taken from an elevated position in the park, such that views extend across the memorial to a vegetated skyline with filtered views of residents opposite the park. The Site (ground) is not visible due to the distance and intervening vegetation. In the future baseline, the upper parts of BTCAAP Development Zone 1 would be visible.
- 15.18 From the opposite side of Martin's Hill recreation ground, **Viewpoint 17** is also representative of recreational users, with views across the Conservation Area. In contrast to viewpoint 16, Bromley's townscape is visible due to the different alignment of the view. The skyline consists of the upper parts of the Churchill Theatre, the Mall Tower and the Crest Building and most of St Marks Tower, due to it being at a lower position in the townscape and closer to the viewpoint. The composition of the view already consists of tall buildings, which extend above the vegetation and demarcate a contrast in scale to residential properties adjacent to the recreation ground. The Site (ground) is not visible due to the intervening vegetation. In the future baseline, the upper parts of BTCAAP Development Zone 1, 2 and 3 would be visible.
- 15.19 Returning to the High Street, **Viewpoint 18** is taken from opposite Bromley College, at the junction with the A222. The view is representative of visitors to the College and Bromley, as well as motorists on the approach to the town centre. The view demonstrates how the vegetated grounds of the College contrast with the urban form of the High Street. The alignment of the High Street truncates longer distance views and the skyline is formed by a consistent scale to the buildings. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, the BTCAAP Development Zones would not be visible.
- 15.20 Continuing north, **Viewpoint 19** is taken from the A21 and is representative of motorist and visitors on the northern approach to Bromley. The view demonstrates that views are channelled along the A21 by the proximity of buildings and that there is a consistent scale in the buildings within the view. The upper part of St Marks Tower is visible, but is situated at the same height as existing buildings within the composition of the view. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, the BTCAAP Development Zones would not be visible.

- 15.21 **Viewpoint 20** is taken from Beckenham Lane and is representative of residents adjacent to the road and motorists on the western approach to Shortlands and Bromley. The view demonstrates that the scale of the overhead railway line truncates longer distance views across the townscape and the associated railway buildings are noticeable. The upper part of St Marks Tower is visible above the railway station, but forms a very small part of the composition of the view. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, part of the BTCAAP Development Zone 1 would be visible above the railway station.
- 15.22 **Viewpoint 21** is taken from Farnaby Road, to the north-west of Bromley Town Centre and is representative of motorists and pedestrians. The view demonstrates that the roadside vegetation largely filters views of Bromley Town Centre, with the exception of the upper part of St Marks Tower and that there are close range views of Shortlands golf course, part of the Shortlands Village Conservation Area. The Site (ground) is not visible due to the distance and intervening vegetation. In the future baseline, the BTCAAP Development Zones would not be visible due to the intervening vegetation.
- 15.23 **Viewpoint 22** is taken from Plaistow Lane to the north-east of Bromley Town Centre and is representative of recreational users and residents in this part of the townscape. The view demonstrates that skyline is formed by a combination of varied building profiles and trees, including the spire of Trinity Church and the upper part of St. Marks Tower. The Site (ground) is not visible. In the future baseline, the BTCAAP Development Zones would not be visible due to the intervening vegetation.
- 15.24 **Viewpoint 23** is taken from Bishops Avenue and is representative of residents to the east of Bromley Town Centre. The view demonstrates that taller buildings adjacent to Elmfield Road (opposite Bromley South railway station) are visible and extend above the skyline. Part of the Crest Building on Ringers Road is also visible. The Site (ground) is not visible due to the distance and intervening vegetation. In the future baseline, BTCAAP Development Zones 2 and 3 would be visible.
- 15.25 Also from the residential areas to the east of the Town Centre, **Viewpoint 24** is taken from The Chase and is representative of residents. The view demonstrates the channelled composition of views due to the alignment of the street and that the properties in the foreground are consistent in scale. The background of the view consist of tall buildings demarcating the town centre, including those adjacent to Elmfield Road, The Mall Tower and the upper parts of St Marks Tower. The Site (ground) is not visible due to the distance and intervening vegetation. In the future baseline, BTCAAP Development Zones 2 and 3 would be visible
- 15.26 **Viewpoint 25** is taken from Murray Avenue and is representative of residents to the east of the Town Centre. The view similarly demonstrates how the background of the view consist of taller buildings adjacent to Elmfield Road. Part of the Crest Building is also visible. The scale of these buildings is a notable contrast to the lower heights of residential properties in the foreground of the view. The Site (ground) is not visible due to the distance and intervening vegetation. In the future baseline, BTCAAP Development Zones 2 would be visible.
- 15.27 **Viewpoint 26** is taken from the A21, on the southern approach to Bromley and is representative of motorists and visitors on the southern approach to Bromley. The view demonstrates how this part of the townscape is demarcated by tall buildings (Perigon Heights) and buildings adjacent to Elmfield Road. These buildings screen longer distance views across the townscape and are focal points within the composition of the view. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 4 would be visible.
- 15.28 **Viewpoint 27** is taken from Cameron Road and is representative of residents in south of Bromley Town Centre. The linear alignment of the road channels views towards St Marks Tower, which is notable for its angled form and height above the intervening properties. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 1, 2 and 3 would be visible.
- 15.29 **Viewpoint 28** is taken from the junction of Cumberland Avenue and Durham Avenue to the west of the Town Centre and is representative of residents. The view demonstrates that there are largely filtered views of buildings in the Town Centre, which include the Crest Building, such that the composition of the view is predominantly of a well vegetated residential area. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 1 and 2 would be visible; albeit filtered by the vegetation.
- 15.30 **Viewpoint 29** is taken from Cumberland Avenue, also to the west of the Town Centre and similarly representative of residential views. The composition of the view consists of a consistent scale of residential properties, with taller massing in the background of the view, in the Town Centre. This includes the Mall Tower and the Churchill Theatre and Crest Building, which extend above the skyline. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 1 and 2 would be visible.
- 15.31 **Viewpoint 30** is taken from Kingswood Road and is representative of residents to the north-west of the Town Centre. The view demonstrates that the upper parts of the Churchill Theatre and St Marks Tower are visible, extending above residential properties in the foreground of the view, such that the taller buildings frame the view. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 1 and 2 would be visible.
- 15.32 **Viewpoint 31** is taken from Southlands Park to the south-east of Bromley and is representative of recreational users. The composition of the view consist of an open foreground, due to the park and a consistent scale of residential properties, which form the skyline. The upper part of St Marks Tower is visible, but it forms part of the overall skyline. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zones would not be visible.
- 15.33 **Viewpoint 32** is taken from Norman Park to the south of the Town Centre and is representative of recreation users. The view demonstrates that the slightly elevated position of the receptor and the open

character of the intervening sports fields enables long distance views towards Bromley. Due to this, the upper parts of St Marks Tower are visible, along with the Crest Building and Perigon Heights. These buildings are consolidated within the central part of the view, with the remainder of the skyline formed by vegetation across the Park. The Site (ground) is not visible due to the distance and intervening buildings. In the future baseline, BTCAAP Development Zone 1 and 2 would be visible.

15.34 **Viewpoint 33** is taken from Langley Park and is representative of recreational users. The view demonstrates that due to the distance and intervening vegetation Bromley Town Centre is not visible. The Site (ground) is not visible. In the future baseline, BTCAAP Development Zone would not be visible.

15.35 **Viewpoint 34** is from Chesham Avenue and is representative of residents. The view demonstrates that the upper parts of St Marks Tower are visible in the background of the view, although forming a very small component of the composition of the view. The Site (ground) is not visible. In the future baseline, BTCAAP Development Zone 1 would be visible.

15.36 **Viewpoint 35** is from Keston Common on the ridge line to the south of Bromley and is representative of recreational users. The intervening vegetation screens views of Bromley. The Site (ground) is not visible. In the future baseline, BTCAAP Development Zones would not be visible.

15.37 **Viewpoint 36** is from Crystal Palace Park and is representative of visitors and recreational users in the Park. The Park is situated across rising ground and this location is from the more elevated western part of the Park, such that there are panoramic views eastwards, which includes Bromley. The upper parts of the Churchill Theatre, the Crest Building and St Marks Tower are visible, being consolidated within the overall extent of the view.

16.0 APPENDIX 4: RELEVANT PLANNING POLICY

National Planning Policy Framework (2021)

16.1 Paragraph 8(c) states:

“an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

16.2 Paragraph 92 states:

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

16.3 Paragraph 124 states:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places.”

16.4 Paragraph 125 states:

“Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”

16.5 Paragraph 126 states:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

16.6 Paragraph 130 states:

“Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

16.7 Paragraph 132 states:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

16.8 Paragraph 134 states:

“Development that is not well designed should be refused, especially where it fails to reflect 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. Conversely, 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

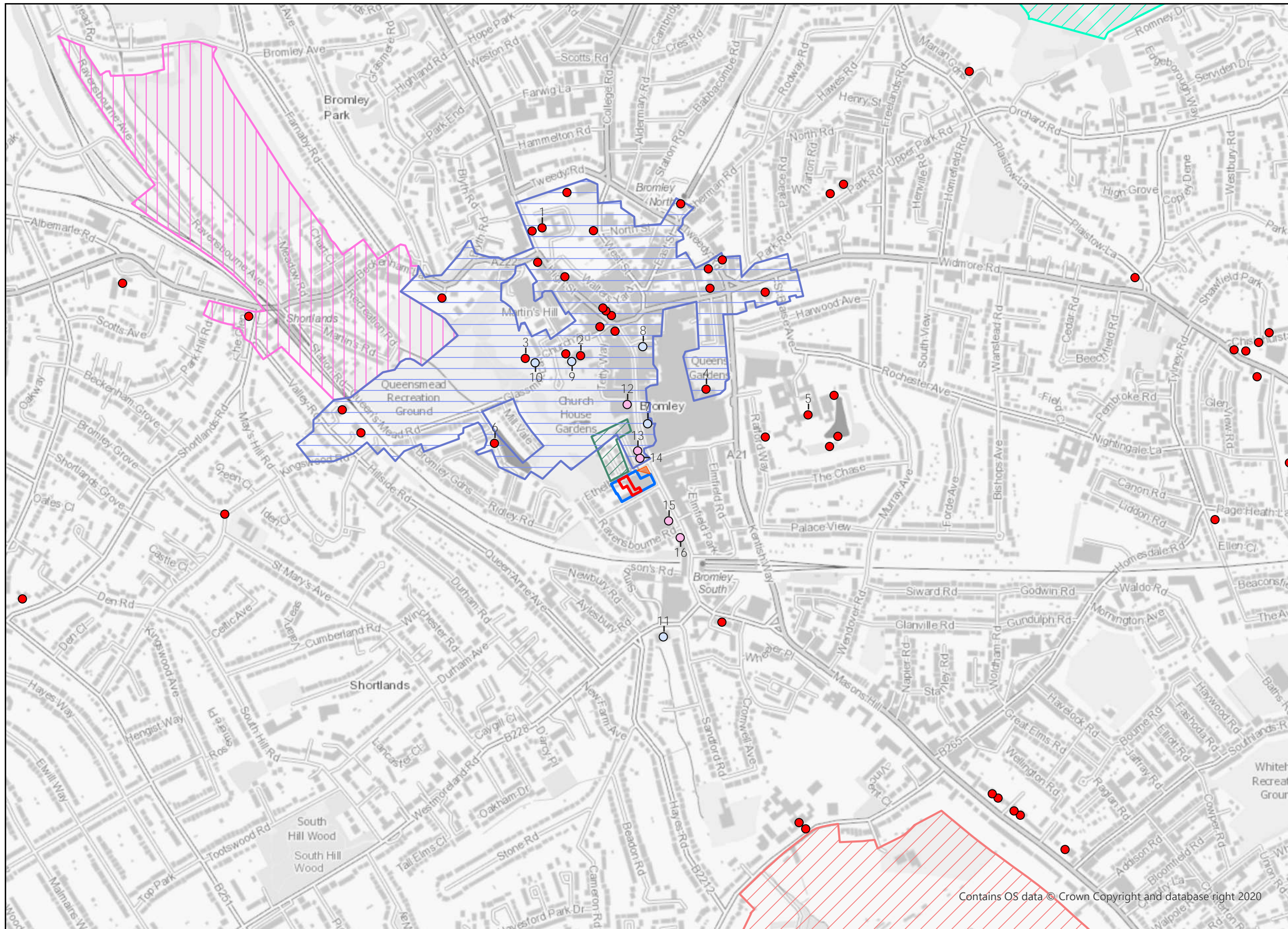
b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”

Bromley Local Plan

16.9 Relevant policies of the Bromley Local Plan are:

- 4: Housing Design; which sets out requirements for housing developments;
- 37: General Design of Development; which sets out requirements for development to achieve high quality design standards, which includes the space around buildings, encouraging local distinctives and a ‘sense of place’ and an attractive townscape;
- 41: Conservation Areas; which sets out the changes to buildings or land use will need to preserve and enhance the characteristics of the CA by respecting or complementing the scale and layout of existing buildings, respecting and incorporating existing landscape features and using high quality materials;

- 42: Development adjacent to a Conservation Area; which states that a development proposal adjacent to a conservation area will be expected to preserve or enhance its setting and not detract from views into or out of the area;
- 43: Trees in Conservation Areas; which does not permit development which would lead to the loss of one or more significant trees;
- 47: Tall & Large Buildings; which states that tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area (see below);
- 48: Skyline; which states that developments which may impact on the skyline shall demonstrate how they will protect or enhance the quality of the views, vistas, gaps and skyline (see below);
- 70: Wildlife Features; whereby new development should improve existing habitats or create new habitats;
- 73: Development and Trees; requiring development to take account of existing trees on site and adjoining land;
- 74: Conservation and Management of Trees and Woodland; to improve the conservation value and amenity value of trees;
- 75: Hedgerows and Development; requiring the retention and beneficial management of existing hedgerows;
- 77: Landscape Quality and Character; whereby the Council will seek to safeguard the quality and character of the local landscape;
- 78: Green Corridors; in considering development proposals, the Council will assess the likely impact on the quality and character of green corridors through the Borough and will seek and support appropriate enhancement and management;
- 79: Biodiversity and Access to Nature;
- 116: Sustainable Urban Drainage Systems, which states all developments should seek to incorporate SUDS or demonstrate alternative sustainable approaches to water management; and
- 122: Light Pollution; which requires lighting in new development to be at an appropriate level so as to minimise impact on amenity, including not being visible from the wider area, nor have an impact on the landscape.



- Key:**
- Site Boundary
 - Bromley Town Centre Area Action Plan Development Zone 2
 - Parks and Gardens
 - Green Belt
 - Bromley Town Centre Conservation Area
 - Shortlands Village Conservation Area
 - Listed Buildings
 1. Bromley College
 2. Church of St Peter and St Paul
 3. Bromley War Memorial
 4. Iron Gates
 5. Old Palace
 6. 19 Glassmill Lane
 - Locally Listed Buildings
 7. Aberdeen Buildings
 8. 157 High Street
 9. St Peter and St Paul War Memorial
 10. Martin's Hill Lodge
 11. St. Mark's Church
 - Buildings of Townscape Merit
 12. The Churchill Theatre
 13. Ravensfell House
 14. 84 High Street
 15. 44 High Street
 16. 42 High Street
- Future Baseline**
- 'S2' 66-70 Bromley High Street
 - Churchill Quarter

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Figure L01



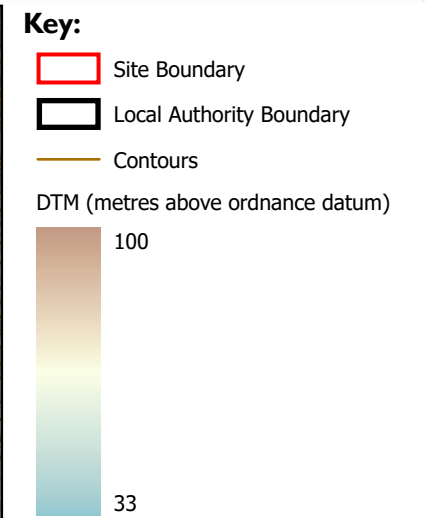
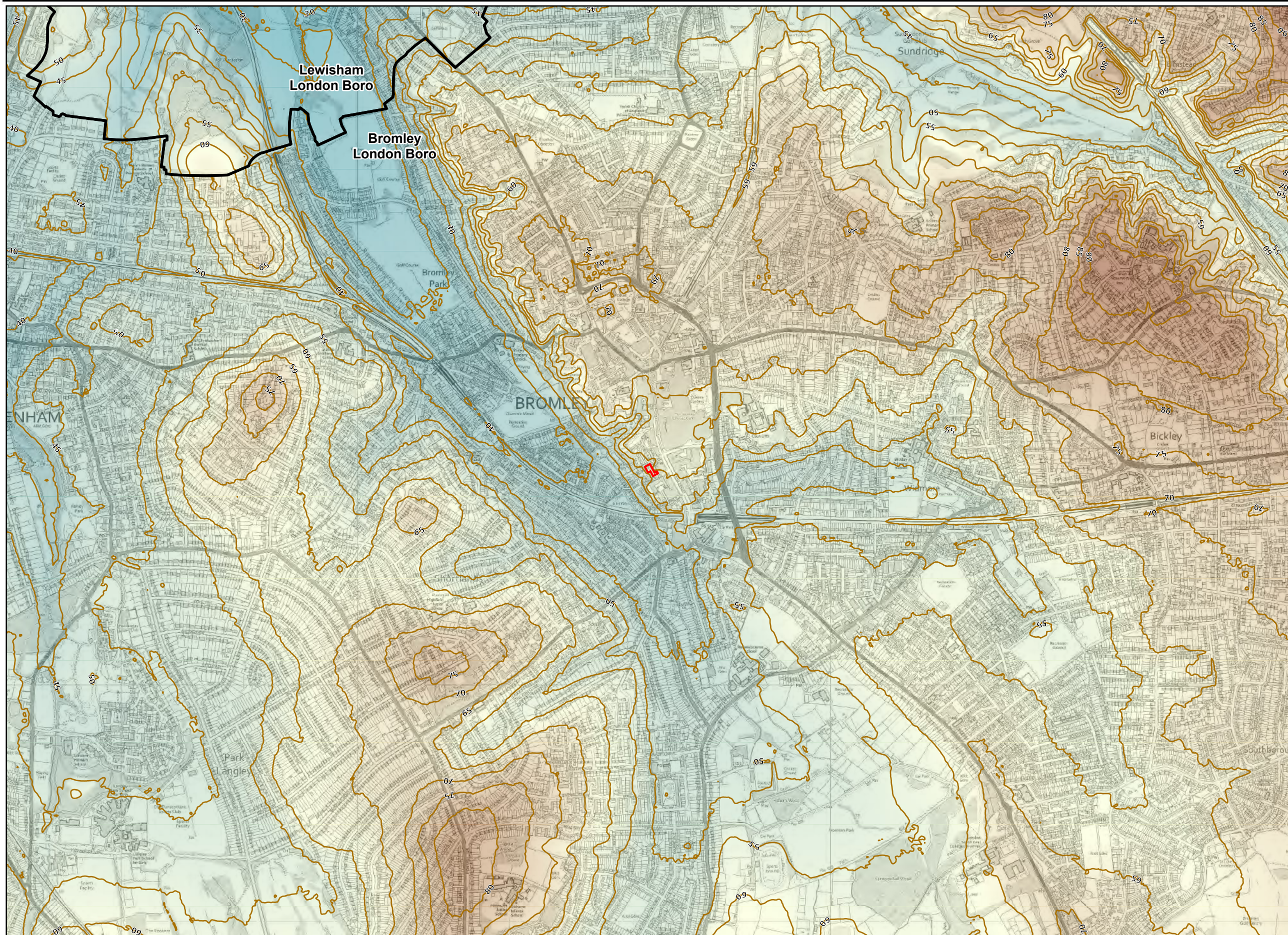


Figure L02





- Key:**
- Site Boundary
 - Bromley Town Centre Conservation Area
 - 1. Ethelbert Town Centre Edge
 - 2. High Street South
 - 3. High Street North
 - 4. Churchill Gardens and Open Space
 - 5. Glades
 - 6. Queen's Gardens
 - 7. Civic Centre
 - 8. Elmfield Office
 - 9. Bromley South
 - 10. Residential East
 - 11. Residential South
 - 12. Residential West
 - 13. Edison Back-Of-House
 - 14. Rail Corridor
 - Shortlands Village Conservation Area

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Figure L03

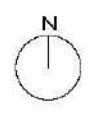


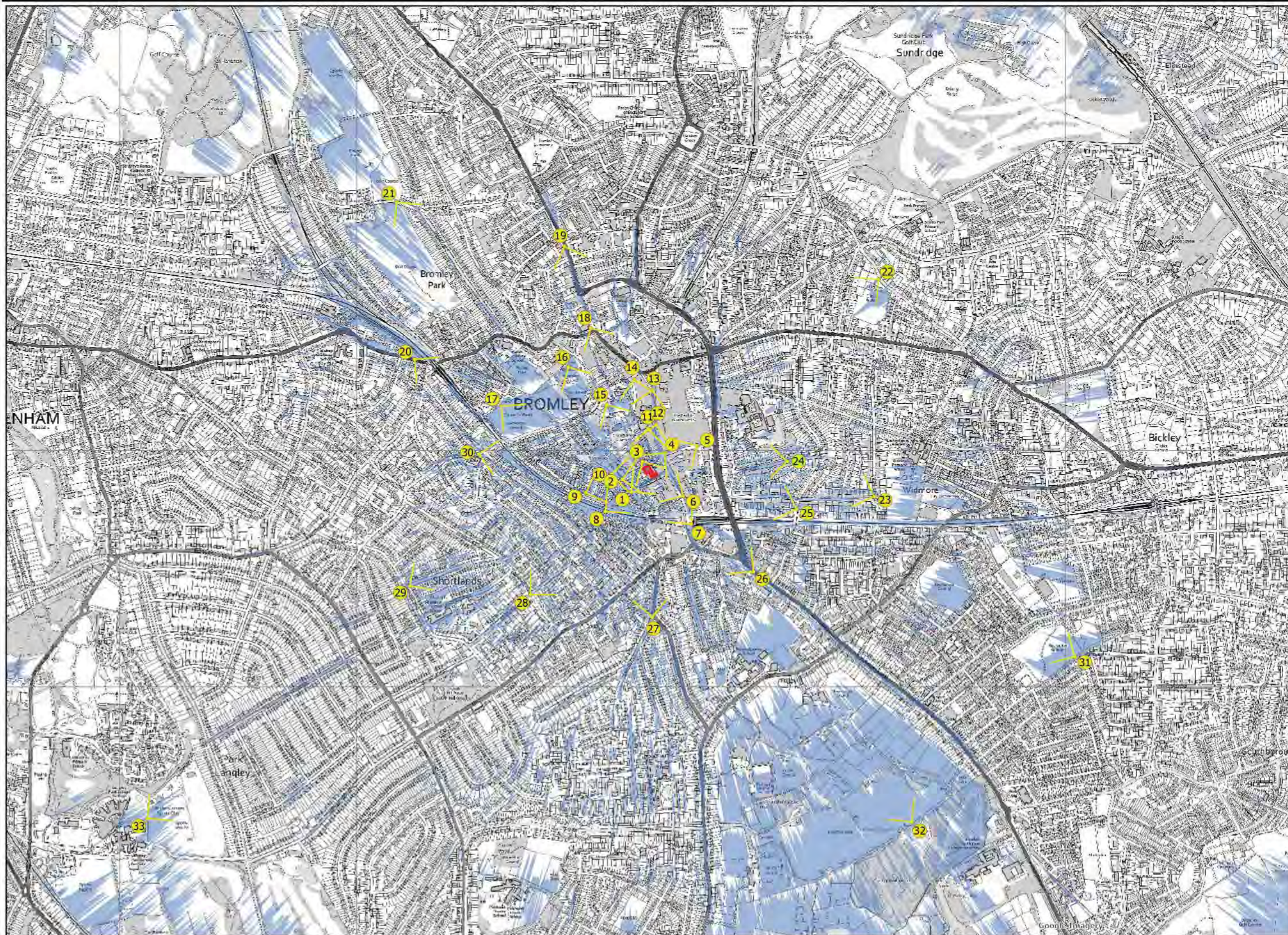
Etla is a Tranfield Landscape Architects Ltd
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RINGER'S ROAD, BROMLEY TOWNSCAPE AND VISUAL ASSESSMENT

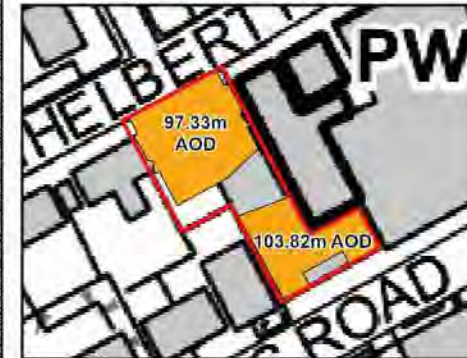
TOWNSCAPE CHARACTER AREA PLAN

Drawing No	0296-L03
Status	Final
Date	13.07.2021
Scale	1:7,500@A3
Revision	-





- Key:**
- Site Boundary
 - Building Footprint
 - Zone of Theoretical Visibility



EA LIDAR Screened ZTV Production Information -
 - EA LIDAR Data (Environment Agency Open Data Release) has been utilised; combining the Digital Terrain Model (DSM) and Digital Surface Model (DSM) to derive screening features.

This method of ZTV takes into account the varied heights of screening features as derived from historic LIDAR surveys, and is therefore representative of the time of survey for that area. Any changes in vegetation cover or building addition/removal will not be taken into account after this date.

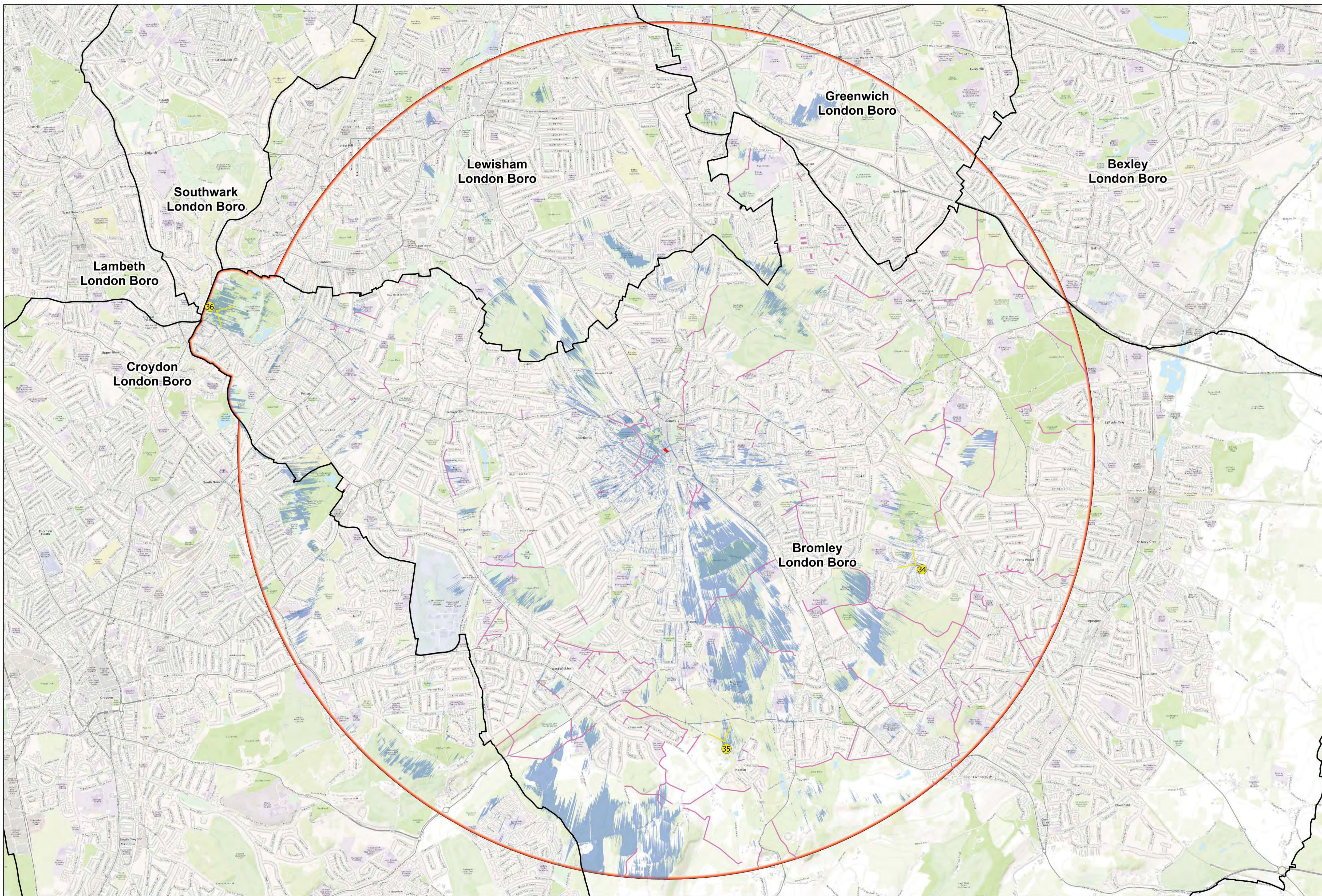
- Viewer height set at 1.5m
- Calculations include earth curvature and light refraction

Date and resolution of LIDAR survey data: **Composite, 1m**

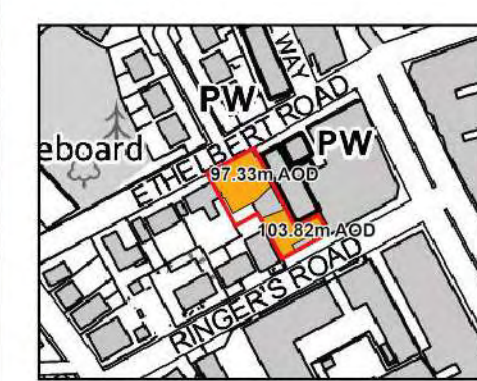
N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development will be visible from, assuming 100% atmospheric visibility.

Figure L04





- Key:**
- Site Boundary
 - Building Footprint
 - Local Authority Boundary
 - Public Right of Way
 - Zone of Theoretical Visibility
 - Extent of Visibility Analysis



EA LiDAR Screened ZTV Production Information - EA LiDAR Data (Environment Agency Open Data Release) has been utilised, comparing the Digital Terrain Model (DTM) and Digital Surface Model (DSM) to derive screening features.

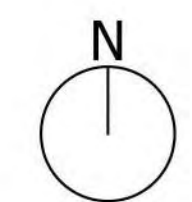
This method of ZTV takes into account the varied heights of screening features as derived from historic LiDAR surveys, and is therefore representative of the time of survey for that area. Any changes in vegetation cover or building addition/removal will not be taken into account after this date.

- Viewer height set at 1.5m
- Calculations include earth curvature and light refraction

Date and resolution of LiDAR survey data: Composite, 1m

N.B. The Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development will be visible from, assuming 100% atmospheric visibility.

Figure L04a



17.0 APPENDIX 5: TALL BUILDING STUDY

TALL BUILDING STUDY

LAND AT RINGERS ROAD, BROMLEY

For The Substantia Group

February 2021

ETLA

Eleanor Trenfield Landscape Architects Ltd

Project Ref:	0296
Report Number	R02
Client:	The Substantia Group
Status:	For Issue
Issue/ Rev:	00
Date:	Feb 2021

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1.0 INTRODUCTION

- 1.1 ETLA were appointed by The Substantia Group to undertake a Tall Building Study in respect of land at Ringers Road, Bromley ('the Site').
- 1.2 The focus of the Tall Building Study is two new residential buildings ('the Proposed Development') at the Site consisting of Block A, adjacent to Ringers Road and Block B, adjacent to Ethelbert Road. Both Block A and Block B will be taller than the existing buildings on Site which range between one and two storeys in height.
- 1.3 With reference to the London Borough of Bromley (LBoB) Bromley Town Centre Area Action Plan (TCAAP), the Site is within an Opportunity Area for redevelopment (part of the Stitch Masterplan) and adjacent to an identified 'possible location for a taller building'. A planning application for a 12 storey building adjacent to the Site ('S2' at 66-70 High Street, Bromley) has also been submitted to the LBoB during the preparation of this Tall Building Study.
- 1.4 The purpose of the Tall Building Study is to review the townscape and visual context of the Site and assess a range of buildings heights (storeys) for Block A and Block B in relation to key views from across Bromley.
- 1.5 The Tall Building Study also considers the potential heights of Block A and Block B in respect of the future redevelopment of Bromley, via the Stitch Masterplan and the 'S2' 66-70 High Street.
- 1.6 The Tall Building Study has been undertaken via fieldwork and computer generated images of Bromley's townscape via VuCity, a 3d computer software programme.
- 1.7 The conclusion of the Tall Building Study will inform the iterative design process for the Proposed Development and the final building heights for Proposed Development which will be assessed via a Townscape and Visual Impact Assessment (TVIA) as part of the planning application.
- 1.8 The Tall Building Study has been undertaken with reference to the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3) and Historic England's Consultation Draft on Tall Building Advice (2020).
- 1.9 The Tall Building Study has also been undertaken by Chartered Landscape Architects with experience in TVIA.

2.0 SITE CONTEXT

THE SITE AND SURROUNDING URBAN GRAIN

- 2.1 With reference to **Figure 1: Viewpoint Location Plan**, the Site is located in the central part of Bromley town centre and to the west of the High Street. The Site is bound by:
- Ethelbert Road, to the north, with residential land uses and Church Hill Gardens beyond;
 - Retail premises and Bromley High Street to the east;
 - Ringers Road, to the south, with residential and commercial land uses beyond; and
 - Residential and commercial land uses to the west, including the railway line between Bromley South station and Shortlands station.
- 2.2 The Site is located in proximity to a key nodal point in Bromley Town Centre, being opposite The Glades Shopping Centre and where the High Street transitions into the pedestrianised Market Square and Bromley Town Centre Conservation Area.
- 2.3 The surrounding townscape pattern and form of buildings bordering the Site is varied, with taller buildings adjacent to lower buildings. Examples of varied building forms and tall buildings in proximity to the Site include:
- The Crest buildings, consisting of Henry House and William House (up to 11 storeys), on Ringers Road, opposite the Site;
 - the Bank of America complex, consisting of three buildings on Elmfield Road;
 - St Mark's Square (19 storeys) and characterised by an angled roof profile to the south of the Site;
 - the Mall tower, to the east of the High Street, rising up from the shopping centre;
 - the Glades; and
 - TK Maxx adjacent to the Site (c.4.5 storeys).

LANDFORM AND HYDROLOGY

- 2.4 The landform surrounding the Site is undulating due to several valley systems and associated watercourses, resulting in a complex pattern of landform, defined by ridgelines and lower lying valleys.
- 2.5 From the southern part of Bromley town centre, the Ravensbourne Valley extends north-west, demarcated by the alignment of the railway line, across Shortlands and Shortlands Golf Club, at approximately 35 metres Above Ordnance Datum (AOD).
- 2.6 From Bromley South station, the landform rises northwards, along the alignment of the High Street, to form a plateau in the northern part of the town centre and approximately 65m AOD. However, the western part of the town centre, between the railway line and the High Street, is characterised by a more varied pattern of landform as part of the north side of the Ravensbourne Valley. The landform

rises steeply between 40m AOD and 65m AOD across the grounds of Church House Gardens and upper parts of St. Martin's Hill to the north of the Site.

2.7 In closer proximity to the Site, Ravensbourne Road is situated at approximately 45m AOD. The landform rises consistently eastwards, across Ethelbert Road and Ringer's Road, to the High Street at approximately 62m AOD. The Site is situated in proximity to the High Street, at approximately 60m AOD, on the more elevated part of Ringer's Road.

2.8 To the south of the railway line, the landform is undulating and also rising, forming the southern side of the Ravensbourne Valley, with localised hills up to 65m AOD. The landform continues to rise across Shortlands to a ridgeline defined by the alignment of the B251 (Hayes Lane), between 70m AOD and 75m AOD. To the west of this ridgeline, the landform falls towards Park Langley and Langley Park, which are situated between 50m AOD and 55m AOD.

2.9 Buildings across the townscape therefore have a notable relationship with the underlying pattern of the landform, being situated across the valley sides and valley floor. The perception of the scale and height of buildings is also influenced by their position in relation to the landform.

PUBLIC RIGHTS OF WAYS (PROWS)

2.10 The Site is not crossed by any Public Rights of Way (PRoW), nor pavements to enable pedestrian movement between Ringer's Road and Ethelbert Road.

2.11 With reference to the LBoB's on-line PRoW mapping¹, PRoW across the study area include:

- PRoW (footpath) 069A, which crosses the elevated parts of St. Martin's Hill, approximately 550m to the north-west of the Site; and
- PRoW (footpath) 074, which extends from Ravensbourne Road, opposite the junction with Ringer's Road to Winchester Road, to the south of the railway line. The PRoW crosses the railway line via a raised pedestrian bridge, which is one of the 'key view' locations identified within the TCAAP (considered within this Tall Building Study as viewpoint D).

2.12 The high street is pedestrianised to the north-east of the Site, from the junction of Ethelbert Road and Elmfield Road, northwards to the northern part of the town centre.

2.13 There are several formal and informal path networks across Church House Gardens, with access from the western end of Ethelbert Road. The routes across the gardens enable access to Glassmill Lane, and across Martin's Hill, as well as to the Churchill Theatre.

2.14 The Site, whilst not publicly accessible, is located adjacent in proximity to key pedestrian routes and nodes within the local townscape, via the connections between PRoW (footpath) 074, Church House Gardens and the pedestrianised start of the High Street at Ethelbert Road.

DESIGNATIONS

2.15 The Site is not covered by any statutory townscape designations.

2.16 With reference to the Bromley Local Plan², the Site is not within an Area of Residential Character neither is it located across the 'major skyline ridges' and nor is it identified as a 'landmark'.

2.17 With reference to the LBoB on-line mapping³, 'views of local importance' are identified across the Borough, but the Site is not located directly within any of these views.

2.18 The Bromley Local Plan identifies the Church Theatre and Library, approximately 160m to the north of the Site, as 'local landmarks'.

2.19 The Site is not within a Conservation Area (CA). The Bromley Town Centre CA is approximately 73m to the north-east of the Site, at the junction of Ethelbert Road and Churchill Way. The Conservation Areas Statement⁴ identifies 'key views' across the Conservation Area, but none are towards the Site

2.20 The TCAAP identifies several 'key views' across the townscape. Those in relation to the Site are from the railway pedestrian footway to the south-west of the Site (included in this study as viewpoint D) and the A21 to the south-east of the Site (included in this study as viewpoint J).

¹ London Borough of Bromley, on-line mapping, https://www.bromley.gov.uk/homepage/242/public_rights_of_way_in_bromley_-_location_map

² London Borough of Bromley, Local Plan, adopted 2019, https://www.bromley.gov.uk/info/1004/planning_policy/1263/the_bromley_local_plan

³ London Borough of Bromley, https://www.bromley.gov.uk/downloads/file/5102/local_plan_map_views_of_local_importance

⁴ Supplied to ETLA via email from the London Borough of Bromley

3.0 TOWNSCAPE CHARACTER

Bromley Town Centre Area Action Plan (TCAAP)

3.1 The TCAAP identifies the Site as within the ‘Bromley Centre Character Area’, which is described by the TCAAP as:

“The main retail and commercial core focussed around the continuous retail frontage of High Street and the covered Glades Shopping Centre. Queens Garden is an important open space but is poorly integrated with the surrounding town centre. There is a strong concentration of activity and retail uses within Bromley Central but limited activity outside standard retail hours.”

3.2 The Site is within the TCAAP boundary and part of Opportunity Site G: West of High Street. The supporting rationale for Site G: West of the High Street includes:

“...Development of the western side of the High Street will improve the appearance of the town centre; and

...The site offers the potential for taller buildings subject to environmental and design considerations.”

3.3 TCAAP Appendix 3: Character Area Guidelines⁵ states the ‘key built form consideration’ for the Bromley Centre Character Area and Opportunity Site G (which covers the Site) are:

“Encourage active edges to street ‘frontages and discourage internalisation of activity and public spaces (i.e. active edges should always front onto public streets or spaces).

Ensure new development responds to the surrounding heritage buildings and the conservation area. Possible locations to consider taller buildings on the western side of the High Street (subject to an assessment of visual impact on the High Street, the conservation area and residential areas to the west.) Building scale needs to be carefully considered especially on the ridgeline.”

3.4 The TCAAP stated ‘Key Landscape Considerations’ for the Bromley Centre Character Area and Opportunity Site G are:

“Create enhanced E-W links to improve through town pedestrian links and to better connect the town to the surrounding landscape assets (e.g. Church House Gardens). A major new square is suggested to the south of the Churchill Tower to act as a forecourt to theatre and to create a strong link between the High Street and Churchill Gardens. Preserve and enhance the good quality streetscape of High Street. Better integration of Queens Garden to the broader town centre.”

3.5 Additional stated development principles for Opportunity Site G (which covers the Site) are:

- *“Sensitive approach to Conservation Area;*
- *Need for a comprehensive approach to development;*

- *Agreed phasing plan;*
- *Variety of architectural style;*
- *Development to provide permeability and create a sensitive active frontage onto Church House and Library Gardens and High Street;*
- *Includes a Department Store Sensitive integration of residential uses;*
- *Potential for taller buildings;*
- *Enhanced gateway to the town centre from the south; and*
- *High quality public realm/civic focus Opportunities for provision of Public art.”*

3.6 The TCAAP identifies the following character areas across the remainder of Bromley:

- The Northern Gateway, at the northern edge of the Bromley town centre and covering Bromley North train station, approximately 675m to the north-east of the Site;
- The North Village, covering the northern part of Bromley town centre, extending between the High Street and East Street, approximately 370m to the north of the Site;
- Western edge, covering parts of Ringers Road, Ethelbert Road and Church House gardens, approximately 20m to the west and extending up to 380m to the north-west of the Site;
- The Civic Centre, covering land to the east of Kentish Way, approximately 375m to the east of the Site; and
- Bromley South, covering Bromley railway station and land to the south of the railway line, approximately 200m to the south of the Site.

3.7 The Site is adjacent to an identified ‘possible location for taller building’ site, covering the TK-Maxx building. The relevant supporting design principles are set out in TCAAP Appendix 5⁶ are:

- *“Any development on the ridge edge is likely, therefore, to be very prominent particularly in views from the west of the town centre;*
- *Development of site G presents a singular opportunity for improving and enhancing the whole of the west side of the High Street from the Churchill Theatre to the railway line;*
- *Development must endeavour to avoid uniform swathes of large scale external cladding and glass. Different styles, heights, treatments and materials should be used to introduce variety;*
- *There is potential for taller buildings on the site. Because of the potential visual impact of buildings on the ridgeline. However it is important that the scale and massing of any future development is assessed with particular regard to views from residential areas to the west, views from the High Street, views from Church House Gardens and from the proposed new public space in site N. Excessive overshadowing should be avoided where possible.”*

3.8 The Site is also adjacent to an area of ‘improved pedestrian access’ along Ringers Road.

3.9 The Site is not part, nor close too, any ‘distinctive building group’, which cross the town centre to the north and south of the Site.

⁵ Bromley Town Centre Area Action Plan, Appendix 1-4, Bromley Town Centre Area Action Plan | London Borough of Bromley

⁶ London Borough of Bromley, Town Centre Action Plan, https://www.bromley.gov.uk/downloads/file/516/btc_aap_appendices_5_to_7_and_glossary

4.0 RELEVANT POLICY

4.1 The following section summarises policies relevant to the Tall Building Study and the Proposed Development.

National Planning Policy Framework (NPPF), 2019⁷

4.2 The relevant policies are NPPF paragraphs:

- 8 - outlining that the economic, social and environmental objectives of sustainable development;
- 91 - outlining the use of street layouts which allow for easy pedestrian and cycle connections within and between neighbourhoods;
- 127 - in respect of achieving well-designed places; and
- 180 - ensuring that new development is appropriate for its location taking into account the likely effects of the natural environment.

NPPF, Draft Text for Consultation, 2021⁸

4.3 This consultation NPPF seeks views on draft revisions to the NPPF. These revisions include that decision making should promote a sustainable pattern of development that seeks to meet the development needs of their area and that design should align with the National Design Guide and National Model Design Code.

4.4 In respect of achieving appropriate densities, the consultation includes a revision stating:

- *“Area-based character assessments, codes and masterplans can be helpful tools in helping to ensure that land is used efficiently while also creating beautiful and sustainable places.”*

4.5 In respect of ‘achieving well design places’, the consultation includes a revision stating:

- *“Conversely, 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 which use visual tools 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.”*

The London Plan, 2016⁹

4.6 Relevant policies of the London Plan are:

- 7.4 - Local Character; whereby development should regard the existing character of an area;
- 7.5 - Public Realm; whereby development should make the public realm comprehensible at a human scale, with landscape treatment of the highest quality which contributes to the easy movement of people through the space;
- 7.6 – Architecture; which requires architecture to make a positive contribution to a coherent public realm;
- 7.7 – Location and Design of Tall and Large Buildings; which sets out a range of criterion for tall buildings, including that they contribute to urban regeneration and are in areas where the existing character would not be affected adversely by the scale, mass or bulk of a tall or large building; and
- 7.8 – Heritage Assets and Archaeology; which requires development affecting heritage assets and their settings to conserve their significance;

London Plan, London View Management Framework (LVMF), 2012¹⁰

4.7 The LVMF sets out the important views to be protected across London. The Site is not within any of the LVMF view corridors.

The Publication London Plan, December 2020¹¹

4.8 The Publication London Plan has been approved by the Secretary of State (29th January 2021), with the Mayor of London now progressing the formal publication of the London Plan.

4.9 The relevant policies are:

- D1: London’s form, character and capacity for growth, which sets out the boroughs should undertake area assessments to define the characteristics, qualities and value of different places;
- D1B: Optimising site capacity through the design-led approach, whereby development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness;
- G1: Green Infrastructure, which sets out that London’s network of green and open spaces should be protected and enhanced:

⁷ Department of Communities and Local Government, National Planning Policy Framework, 2012, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60777/2116950.pdf, accessed January 2012

⁸ Department of Communities and Local Government, National Planning Policy Framework, 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/961244/Draft_NPPF_for_consultation.pdf

⁹ The London Plan, updated 2016 and 2017, <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>

¹⁰ London View Management Framework, <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management>

¹¹ The draft New London Plan, <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

- G2: London’s Green Belt, which should be protected from inappropriate development and enhanced to provide appropriate multi-functional beneficial uses;
- G5: Urban Greening, which sets out proposals should seek to meet the Urban Greening Factor, with a target score of 0.4 for residential developments; and
- G7 Trees and woodlands, which sets out the London’s urban forest and woodlands should be protected.

London Borough of Bromley, The Bromley Local Plan, adopted 2019¹²

4.10 With reference to the on-line Local Plan¹³, the Site is covered by Policy 90: Bromley Town Centre Opportunity Area, requiring new homes and jobs with reference to the Bromley Town Centre Area Action Plan.

4.11 Other relevant policies of the Bromley Local Plan are:

- 4: Housing Design; which sets out requirements for housing developments;
- 37: General Design of Development; which sets out requirements for development to achieve high quality design standards, which includes the space around buildings, encouraging local distinctives and a ‘sense of place’ and an attractive townscape;
- 41: Conservation Areas; which sets out the changes to buildings or land use will need to preserve and enhance the characteristics of the CA by respecting or complementing the scale and layout of existing buildings, respecting and incorporating existing landscape features and using high quality materials;
- 42: Development adjacent to a Conservation Area; which states that a development proposal adjacent to a conservation area will be expected to preserve or enhance its setting and not detract from views into or out of the area;
- 47: Tall & Large Buildings; which states that tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area (see below);
- 48: Skyline; which states that developments which may impact on the skyline shall demonstrate how they will protect or enhance the quality of the views, vistas, gaps and skyline (see below);

4.12 Policy 47: Tall Buildings states:

“Proposals for tall and large buildings will be required to make a positive contribution to the townscape ensuring that their massing, scale and layout enhances the character of the surrounding area. Tall and large buildings will need to be of the highest architectural design quality and materials and be appropriate to their local location and historic context, including strategic views. Proposals for tall buildings will be required to follow the current Historic England Guidance.”

4.13 The supporting text for Policy 47: Tall Buildings states:

“Tall buildings are those that exceed the general height of their surroundings and cause a significant change to the skyline. Much of the Borough is not considered appropriate for tall buildings due to the established suburban character of the Borough. However, potential may exist for such development to be considered in town centre locations which benefit from good public transport, exhibit an existing local built character that would allow for taller buildings, and where no harm would be caused to heritage assets, the wider historic environment or important views. The adopted Bromley Town Centre Area Action Plan identifies potential sites for tall buildings within the town centre.”

4.14 Policy 48: Skyline states:

“The Council will require developments which may impact on the skyline to demonstrate how they will protect or enhance the quality of the views, vistas, gaps and skyline listed below.”

4.15 The supporting text for Policy 48: Skyline states:

“The presence of a view or vista listed below will need to be taken into account in the design quality, configuration, height and site layout of new development or extensions to existing developments which may impact them. Views will need to be considered to ensure intrusive elements are not introduced whether in the foreground, middle ground or background through a visual impact assessment. The Council will work in partnership with neighbouring boroughs where there are cross-boundary views and settings so that these are positively managed.”

London Borough of Bromley, Bromley Town Centre Area Action Plan, 2010

4.16 The TCAAP sets out the Council’s vision for the town centre together with objectives, policies and proposals to guide future development and change, based upon enhancing Bromley.

4.17 The relevant TCAAP policies are:

- Policy BTC17: Design Quality, which requires the highest standard of design in all new development, such that they enhance the appearance and environment of the town centre and include an appropriate enhancement of the historic environment. The design of new development will be required to reflect the Character Area analysis set out in the TCAAP;
- Policy BTC18: Public Realm, which requires high quality, well designed and well connected public realm;
- Policy BTC19: Building Height, which requires assessments as part of any planning application. In particular, it will be necessary to take account of key views and vistas and impact on the character of town centre and Conservation Area (views from these locations are included in the Tall Building Study as viewpoints F and G); and

¹² London Borough of Bromley, https://www.bromley.gov.uk/info/1004/planning_policy/1263/the_bromley_local_plan

¹³ London Borough of Bromley, Bromley Local Plan on-line mapping, <https://planvu.co.uk/bromley/>

- Policy OSG: West of High Street, whereby the Council will work with developers to promote regeneration.

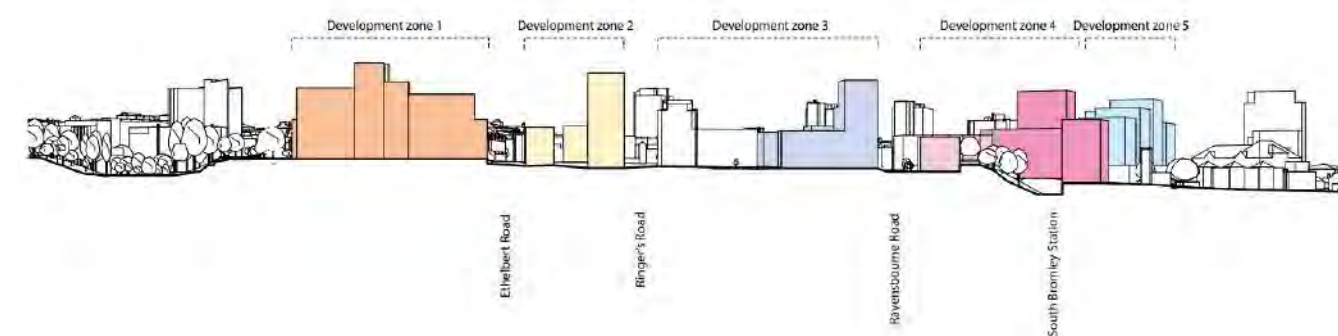
5.0 FUTURE BASELINE

5.1 As set out in the introduction, the Tall Building Study considers the two developments within the visual analysis as part of the ‘future baseline’. These are summarised below.

The Stitch Masterplan

5.2 The Stitch Masterplan proposes a new mixed use neighbourhood centre within Bromley Town Centre, extending to the south of the High Street, between the Churchill Theatre and Bromley South railway station.

5.3 With reference to the below illustrative section, the Site is situated within ‘Development Zone 2’ which includes new buildings up to 14 storeys in height.



5.4 The more relevant part of the Stitch Masterplan in relation to the Site is the Churchill Quarter (Planning Application Ref: 18/02181/FULL1). This is located opposite the Site, extending from Ethelbert Road to the Churchill Theatre (red line location plan below).



5.5 The Churchill Quarter scheme consists of the demolition of 1-40 Ethelbert Close, 2 Ethelbert Road, 102-108 High Street and miscellaneous buildings to the north of Ethelbert Close. Redevelopment will consist of a mixed use scheme of 407 residential units up to 16 storeys in height. A decision is still pending, but the application has extended beyond the determination period.

5.6 With the implementation of the Stitch Masterplan, the context to the Site will be fundamentally altered, with taller buildings across Bromley Town Centre. The Site will continue to provide the opportunity for regeneration and a tall building, as set out for Development Zone 2.

‘S2’ 66-70 Bromley High Street (Planning Application Ref: 19/04588/FULL1)

5.7 The application covers land at the corner of Ethelbert Road and the High Street adjacent to the Site. The application proposes a 12 storey building, which then transitions to a lower, c.4 storey building adjacent to the High Street.

5.8 The below ‘before and after’ image (extracted from the planning application documents) is from the junction of Elmfield Road and the High Street. The Site is immediately beyond the proposed 12 storey building. The blue line to the right of the image is the outline of the Churchill Quarter scheme.



5.9 With the implementation of this planning application, there would be an approved principle in townscape and visual terms for the acceptability of 12 storey massing on Ethelbert Road and adjacent to the Site.

5.10 This would establish a transition in building heights between the existing two to three storey residential properties bordering Ethelbert Road. The approval would also provide the opportunity for additional massing and height in the townscape to demarcate the key nodal point in the townscape and establish a cluster of taller buildings at the transition between Ethelbert Road and the High Street.

6.0 TALL BUILDING STUDY

METHODOLOGY

6.1 As set out in the introduction, the assessment of differing building heights (storeys) for Block A and Block B has been undertaken from key viewpoints across Bromley. These key views have been derived from the above baseline review, the generation of Zones of Theoretical Visibility (ZTVs) and fieldwork during winter conditions, i.e. when deciduous vegetation is not in leaf and the extent of visibility across the townscape is greater.

6.2 With reference to **Figure 1: Viewpoint Location Plan**, the following table sets out the location of the viewpoints and their justification for inclusion within the Tall Building Study.

Viewpoint Reference	Location	Reason for Inclusion
A	Martin’s Hill Recreational Ground	To demonstrate the view from a localised high point in the northern part of the Bromley town centre and views from a key recreational area. Views from this location are identified in supporting evidence base studies (although not towards the Site).
B	Kingswood Road	To demonstrate views from residents and schools in the western part of Bromley, as well as the lower lying parts of the recreation ground.
C	Church House Gardens	To demonstrate the view from a recreational area within the townscape and designated location for ‘key views’ within the townscape.
D	View from railway crossing	This is a localised elevated position within the townscape and one of the ‘key views’ within the supporting evidence base.
E	Cumberland Road	To demonstrate views from residents adjacent to this road in the western part of the townscape.
F	Bromley High Street North	To demonstrate the view from the northern part of the High Street and in the context of other key buildings and future baseline schemes, as well as from the Conservation Area.
G	Junction of Elmfield Road and the High Street	To demonstrate the view from transition between the High Street and Market Street and in the context of other key buildings and future baseline schemes, as well as from the Conservation Area.
H	The Chase	To demonstrate views from residents adjacent to this road in the eastern part of the townscape.
I	Bromley South station	To demonstrate views from the southern part of the High Street and a key point of arrival within the townscape.
J	A21, Bromley South	To demonstrate the views from approach to the station and arrival to Bromley and one of the ‘key views’ identified within the supporting evidence base.
K	Junction of the B2212 and Cameron Road	To demonstrate views from residents adjacent to this road in the southern part of the townscape.
L	Ringers Road	To demonstrate representative views from Ringers Road.
M	Ethelbert Road	To demonstrate representative views from Ringers Road.

6.3 The methodology for the modelling is set out in Appendix A.

6.4 Block A, adjacent to Ringers Road, is proposed to be the taller building to reflect the relationship with existing tall buildings on the opposite side of Ringers Road which are approximately 11 storeys in the height. The analysis for Block A has considered buildings heights ranging between 8 and 19 storeys, to

reflect the existing building heights on the opposite side of Ringers Road, as well as to test the opportunity to demarcate this part of the townscape and skyline via a taller building.

6.5 Block B, adjacent to Ethelbert Road, is proposed to be the lower building, to reflect the relationship with Bromley Town Centre Conservation Area and the transition in scale between the Churchill Quarter scheme and the Site. The analysis for Block B has considered building heights ranging between 8 storeys and 12 storeys, to reflect the existing context and comments from the LBoB, as well as the future baseline of the application for 'S2' 66-70 Bromley High Street, which is proposed at 12 storeys in height.

6.6 The differing storey heights are annotated on the following figures, along with the inclusion of the Churchill Quarter (rendered blue) and 66-70 Bromley High Street (rendered pink) where relevant.

TALL BUILDING ANALYSIS

Viewpoint A: Martin's Hill Recreational Ground

6.7 With reference to **Figure 2**, the existing view from this location is characterised by generally filtered views of buildings bordering the recreational ground, due to the intervening vegetation and more open views across the wider townscape, to the west of Bromley. Because of the elevated position of the view, the ZTV modelling and its inclusion within the evidence base, there is the potential for a tall building within the Site to be visible.

6.8 **Figure 2** demonstrates that Block A would be visible between 14 and 19 storeys in height but Block B would not be visible, due to the density of the intervening vegetation and landform.

6.9 At 14 to 15 storeys, Block A would be seen at the equivalent height to the upper parts of St Marks Tower. The additional height, between 16 to 19 storeys would form more of a focal point within the view and a progression in scale from St Marks Tower. All heights, between 14 and 19 storeys would result in a localised reduction in the amount of sky within the view, but would not alter views of features in the park or the wider townscape to the west of the Bromley.

6.10 In relation to the future baseline, Block A would be viewed in the direct context of the Churchill Quarter (illustrated dark grey), with the Churchill Quarter screening part of Block A. At 17 storeys in height, Block A would reflect the same height as the Churchill Quarter within the view. At 18 to 19 storeys in height, Block A would extend above the Churchill Quarter. This would provide visual interest to the skyline and a stepped arrangement to the massing. The integration of 18 to 19 storeys and achieving a varied skyline in relation to the Churchill Quarter will depend on the architectural finish and detailing to the upper parts of Block A.

6.11 From viewpoint A, Block A is therefore visible once above 14 storeys. In relation to the existing context, the height of Block A would reflect that of St Marks Tower up to 15 storeys. Above 15 storeys, Block A has the opportunity to provide a focal point on the skyline. With the implementation of the Churchill Quarter, Block A would be part of group of taller massing across the skyline. With Block A extending to

19 storeys, it would be taller than the Churchill Quarter, but would provide visual interest via a varied skyline.

Viewpoint B: Kingsland Road

6.12 With reference to **Figure 3**, the existing view from this location is characterised by residential properties across the foreground of the view and the upper parts of the Churchill Theatre in an elevated position, in the background of the view. The angled roof profile of St Marks Tower is also visible to the right of the view. Because of the visibility of these buildings across the ridgeline and the ZTV modelling, there is the potential for a tall building within the Site to be visible from this location.

6.13 **Figure 3** demonstrates that at the maximum building heights of Block A at 19 storeys and Block B at 12 storeys, the Proposed Development would not be visible, as demonstrated by the red hatching. This is due to the residential properties in the foreground of the view, the distance and that the Site is situated at a lower topographic position within the townscape in comparison to the Churchill Theatre.

6.14 Therefore, there would be no change to the view from this location and no constraints in townscape and visual terms.

Viewpoint C: Church House Gardens

6.15 With reference to **Figure 4**, the existing view consists of several buildings visible beyond the entrance to the gardens. These include the upper parts of the Crest Building (Henry House and William House) on Ringers Road, opposite the Site. Due to the proximity of the viewpoint and that these existing buildings, there is the potential for buildings within the Site to be visible.

6.16 **Figure 4** demonstrates that Block A would be visible, due to its position on Ringers Road, which is situated in an elevated position within the view. As the buildings across Ethelbert Road and Ringers Road are stepped in height, due to the falling landform, it is considered appropriate that Block A is taller in height than these intervening buildings. This is because it reflects the pattern of stepped roof profiles and the rhythm of the skyline. The 9 and 10 storey building heights of Block A are considered to reflect the existing transition in scale and stepped arrangement of buildings and the Crest Building (hatched in yellow). With Block A extending up to 13 storeys in height, it is considered to provide a stepped transition in scale between the Crest Building and forms the higher massing in a cluster of buildings with Block B. Above 13 storeys, the increased height forms a more notable step in scale and increased height.

6.17 For Block B, **Figure 4** demonstrates that the visibility of building heights is varied due to the intervening vegetation, but all storeys are visible. Building heights of between 7 and 8 storeys are considered to reflect the pattern of the stepped roof profiles and existing building heights along Ethelbert Road. The 11 and 12 storey buildings heights are a more notable change in height, but provide a successful relationship and change in scale with Block A, forming part of cluster of buildings which includes the Crest Building (hatched yellow).

- 6.18 Compositionally, the relationship of Block B being lower in height than Block A is considered appropriate in the context of this view, as it allows for the transition in scale and building height to occur slightly further from the viewer.
- 6.19 In addition to the introduction of two new buildings within the view, the only visual change that occurs with increased heights of Block A and Block B is a very minor reduction in the amount of sky within the view. The increased height does not screen any longer distance views, nor does it increase the enclosure to the view, given the townscape is already elevated above the viewer.
- 6.20 In terms of the existing context, responding to the existing building heights would be achieved via Block A at 12 storeys in height. Increasing Block A to 19 storeys is considered not to adversely impact the view and provides opportunity for further demarcating a cluster of buildings along Ringers Road. This is particularly relevant given the opportunities for architectural detailing and refinement of the building massing.
- 6.21 For Block B, the more integrated building height with the existing townscape is considered to be 10 storeys due to the relationship with the Crest Building. However, similar to Block A, there is no adverse visual impact from the additional height due to what is a localised loss of sky. The architectural detailing similarly provides opportunities for reducing the perceived massing.
- 6.22 In relation to the future baseline and the implementation of the Churchill Quarter (hatched dark grey), the context of the view is substantially different. The Churchill Quarter results in new massing and taller buildings in closer proximity to the viewpoint and a clear progression in scale from existing buildings on Ringers Road and Ethelbert Road.
- 6.23 Block B, at 12 storeys, reflects the height of the Churchill Quarter scheme within the view and Block A provides visual interest to the skyline by stepping up in height, with 18 and 19 storeys mirroring the height of the Churchill Quarter. Block B continues to form a transition in scale and heights with existing buildings on Ringers Road and Ethelbert Road.
- 6.24 Therefore, whilst the taller heights for Block A and Block B are more notable transition in scale in comparison to existing views, in the context of the future baseline, they are considered to integrate successfully with the skyline of the Churchill Quarter and provide the opportunity for an interesting and varied skyline.
- Viewpoint D: Railway Crossing**
- 6.25 With reference to **Figure 5**, the existing view includes height in the townscape via the Crest Building (Henry House and William House) on Ringers Road (hatched yellow) and the angled roof alignment of St. Marks Tower. The background of the view consists of buildings across Bromley Town Centre with the alternating building heights forming a varied skyline. Due to the angle of the view and that these existing buildings are visible, there is the potential for buildings within the Site to also be visible.
- 6.26 **Figure 5** demonstrates that the alignment of the view results in all proposed storey heights across Block A being visible. At 11 and 12 storeys, Block A provides a corresponding building height with the Crest Building, as well as stepped arrangement of massing in relation to other buildings on Ringers Road. The increase in height, between 13 and 19 storeys results in a more notable change in building heights and demarcates Block A as a focal point in the view. At 19 storeys in height, Block A is seen at an equivalent height to St Marks Tower, to the right of the view.
- 6.27 Across Block B, buildings heights of between 6 and 12 storeys are visible to the same degree. At 9 and 10 storeys in height, Block B is considered to integrate with the existing height of the Crest Building (hatched yellow), as well as provide a change in scale and stepped form with existing buildings on Ethelbert Road. The increase in height to between 11 and 12 storeys makes the change in scale from buildings on Ethelbert Road more noticeable, but still reflects the existing composition of taller buildings within the view, via the Crest Building.
- 6.28 The only change to the view from increased heights of Block A and Block B is a very minor reduction in the amount of sky within the view. The increased height does not screen any longer distance views.
- 6.29 In terms of the existing context, responding to the existing building heights within the view, whilst providing a varied skyline and stepped massing would be achieved by Block A between 11 and 12 storeys in height and Block B between 9 and 10 storeys. Increasing Block A to 19 storeys in height and Block B to 12 storeys is considered not to adversely impact the view and provides an opportunity to counterbalance the horizontal massing across the Crest Building, with a vertical feature in the skyline to provide visual interest. This would be developed through the architectural detailing and façade treatments to enable Block A to be the central focus of a cluster of buildings extending between Ethelbert Road and Ringers Road.
- 6.30 In relation to the future baseline and the implementation of the Churchill Quarter (dark grey hatch), the context of the view is substantially different. The Churchill Quarter results in new massing and taller buildings across the skyline and a notable change in comparison to the scale of existing buildings along Ethelbert Road. The 'S2' 66-70 Bromley High Street development would also be visible, (light blue hatch), although seen between Block A and Block B.
- 6.31 With the future baseline context, the additional height in Block A provides the opportunity for a more characteristic skyline with the Churchill Quarter via framing the alternating building heights across Block B and the Churchill Quarter. Due to this, the taller height of Block A is considered to reflect the Churchill Quarter massing. This is also aided by the taller height of Block B, to complement the taller massing across the Churchill Quarter and the change in height with Block A.
- 6.32 Therefore, whilst the taller heights for Block A and Block B are more notable transition in scale in comparison to existing views, in the context of the future baseline (the Churchill Quarter), they are considered to integrate successfully with the skyline of the Churchill Quarter and provide the opportunity for an interesting and varied skyline.

Viewpoint E: Cumberland Road

- 6.33 With reference to **Figure 6**, the existing views are channelled along Cumberland Road, with the upper parts of the Crest Building (hatched yellow) and several other tall buildings visible in the background of the view. These existing buildings already extend above the skyline and demarcate a change in views in comparison to lower height and similar massing of residential properties in the foreground of the view.
- 6.34 **Figure 6** demonstrates that both Block A and Block B would be visible. The change to the view, between would be additional tall buildings on the skyline, seen in the context of the Crest Building. There would be a very minor reduction in the amount of sky. The overall composition of the view would not change, with Block A seen as one of a series of vertical features which already extend above the skyline. Increasing the building heights of Block A and Block B provides the opportunity for demarcating the Site and the transition in the town centre between the High Street and Market Street and establishing a cluster of buildings around Block A.
- 6.35 In relation to the future baseline, the scale and height of the Churchill Quarter (dark grey hatch) would result in additional massing above the existing skyline, along with the redevelopment of the TCAAP Development Zone 3.
- 6.36 In this context, Block A would establish a visual relationship with the Churchill Quarter due to its similar height. This would be achieved with Block A being between 14 to 19 storeys, due to being a similar height to the Churchill Quarter.

Viewpoint F: Bromley High Street North

- 6.37 With reference to **Figure 7**, the existing view is channelled via the generally consistent scale of two to three storey buildings bordering the High Street. The transition between the pedestrianised part of Market Street and the vehicular High Street is visible to the left of the view (and more so with the removal of the market stalls). The TK Maxx building is visible, along with the upper part of the Crest Building and the upper part of St Marks Tower.
- 6.38 **Figure 7** demonstrates that Block A would be visible between 7 and 19 storeys in height. Block A would reflect the existing composition of the view, by forming a focal point in the view and taller building, similar to the Crest Building and the upper part of St Marks Tower. The overall composition of the view would remain, with a taller building visible beyond Market Street. The upper parts of Block B would also be visible, between 10 to 12 storeys. These heights would reflect the scale of taller buildings on the High Street in the foreground of the view.
- 6.39 In relation to the future baseline, the Churchill Quarter (dark grey hatch) would introduce additional height and massing within the view and adjacent to the High Street. This would substantially reduce the visibility of Block B. Block A would remain visible, with the taller height of Block A, at 18 and 19 storeys, reflecting the height of the upper parts of the Churchill Quarter.

- 6.40 The view also demonstrates the potential change from 'S2' 66-70 Bromley High Street (illustrated by the light blue hatch). The 'S2' scheme would reduce the visibility of part of Block A, as well as introducing taller building heights along Ethelbert Road. In combination with the Churchill Quarter, there would be a varied skyline, alternating in heights between Block B, 'S2' and Block A. The taller heights of Block A (between 17 to 19 storeys) and Block B (between 11 and 12 storeys) are considered to enable this varied skyline and achieve a unified arrangement of buildings at the transition between the High Street and the Market Place.

Viewpoint G: Junction of Elmfield Road and the High Street

- 6.41 With reference to **Figure 8**, there are close range views towards the Site from the junction of Elmfield Road and the High Street, which is a key node in the townscape, as it both demarcates the transition between the pedestrianised and vehicular routes, as well as Bromley Town Centre Conservation Area. The upper part of St Marks Tower is visible in the view, along with the roof profile of the Crest Building.
- 6.42 The orientation of the view enables channelled views along Ethelbert Road. The scale of the existing buildings, including that at the Site, is generally consistent at two to three stories in height, with the buildings reducing in height along Ethelbert Road, due to the sloping landform, away from the High Street.
- 6.43 **Figure 8** demonstrates that Block A would be visible above the buildings bordering the High Street at 9 storeys in height, with 19 storeys representing a notable change in scale above TK Maxx. The increased height of Block A would result in a very slight reduction in the amount of sky within the view.
- 6.44 For Block B, all potential building heights would be visible, due to the orientation of the view. Due to the foreshortening, building heights of up to 9 storeys in height are considered to provide a transition in scale with the existing buildings along Ethelbert Road and the TK Maxx building. The additional height between 10 to 12 storeys increases this step in scale, such that the building height of Block B is perceived as twice the height of existing buildings along Ethelbert Road, but a sympathetic step change in relation to the TK Maxx building.
- 6.45 In terms of the existing context, increasing Block A to 19 storeys in height is considered not to adversely impact the view given that it would result in a localised loss of sky and provide the opportunity to demarcate the nodal point in the townscape. The detailing to Block would need to be developed through the architectural design and façade treatments to integrate with the buildings on the High Street.
- 6.46 Increasing Block B to 12 storeys in height is similarly considered not to adversely impact the view. This is because the channelled composition of the view would remain, with only a slight loss in sky.
- 6.47 In terms of the future baseline, there would be a notable change to the composition of the view, via views of 'S2' 66-70 Bromley High Street. The proximity of the S2 building and the foreshortening of the

view would screen Block A. Block B would remain partially visible, although seen at a corresponding height to S2 66-70 High Street

Viewpoint H: The Chase

6.48 With reference to **Figure 9**, existing views are channelled by the alignment of the road and the consistent scale of two storey residential properties. The background of the view consists of taller buildings across Bromley, between St Marks Tower, Elmfield Road and the Mall Tower, all of which extend above the skyline.

6.49 **Figure 9** demonstrates that Block A would be visible above 10 storeys in height and that at 19 storeys in height it would reflect the height and scale of The Mall Tower.

6.50 Part of the 12th storey of Block B would be visible, but it would be a barely noticeable change to the view, due to being seen in the context of residential properties.

6.51 Increased height at Block A therefore provides the opportunity for demarcating the Site and the relationship between The Mall Tower and the High Street within the view, similar to the way in which St Marks Tower and Elmfield Road demarcate the southern part of Bromley.

Viewpoint I: Bromley South Station

6.52 **Figure 10** demonstrates that the existing view consists of St Marks Tower and buildings of varying scale and heights along the High Street.

6.53 **Figure 10** demonstrates that Block A would be visible above 13 storeys in height, extending above existing taller massing on the high street. The increased height of Block A would result in an increased focal point and wayfinding on arrival at Bromley South station. The height of Block A and its relationship to existing buildings in the view would depend on the architectural design and finishes, but there are a variety of building forms which the design and upper storeys of Block A could respond to.

6.54 **Block B** would not be visible, due to the intervening buildings and distance.

6.55 In respect of the future baseline, the TCAAP Development Zone 4 (dark grey hatch) would screen Block A (illustrated by the red hatch).

Viewpoint J: A21

6.56 **Figure 11** demonstrates that the existing view on the approach to the southern part of Bromley consists of tall buildings.

6.57 Neither Block A, nor Block B, would be visible due to the distance and intervening buildings in respect of the existing context and future baseline (demonstrated by the red hatch).

6.58 Therefore, there are no visual constraints from this part of the townscape in relation to the heights of Block A up to 17 storeys and Block B up to 12 storeys.

Viewpoint K: Junction of the B2212 and Cameron Road

6.59 **Figure 12** demonstrates the visibility of St Marks Tower within views from the southern part of Bromley Town centre and the contrast in scale between the residential properties in the foreground of the view and St. Mark's Church.

6.60 In terms of the existing context, **Figure 14** demonstrates that Block A would be visible above 15 storeys, seen beyond St Marks Tower. At 19 storeys in height, Block A would be positioned well below the highest part of St Marks Tower.

6.61 **Figure 12** demonstrates that the 12th storey of Block B would also be visible, but would be seen as part of the lower section of St Marks Tower.

6.62 The impact of the visibility of Block A in relation to the profile of St Marks Tower would depend on the architectural detailing of the form, massing and materials of Block A. Reducing the height of Block A to 15 storeys or lower would retain the existing view and profile of St Marks Tower.

6.63 In relation to the future baseline, **Figure 12** demonstrates that the Churchill Quarter (illustrated by the dark grey hatch) would introduce additional buildings beyond St Marks Tower. Similar to Block A the Churchill Quarter would be located well below the highest part of St Marks Tower. In combination with Block A and Block B there would be a cluster of buildings in the background of the view, providing a more varied skyline. The resolution of the detailing of Block A in relation to the angled profile of St Marks Tower would remain, but the context would be substantially different with the introduction of the Churchill Quarter.

6.64 From this location, it is considered that 19 storeys in height for Block A and 12 storeys in height for Block B can be accommodated within the composition of the view, but is very reliant on the architectural form and detailing of the building to establish a successful relationship with St Marks Tower.

Viewpoint L: Ringers Road

6.65 **Figure 13** demonstrates that the existing view is channelled along Ringers Road, with buildings rising in height towards the High Street. This is due to both the rising landform and the increased height of the buildings, specifically the Crest Building, on the right of the view (hatched yellow). **Figure 13** also demonstrates that there are no longer distance views across the townscape, due to the buildings on the High Street forming the skyline.

6.66 In terms of the existing context, **Figure 13** demonstrates that Block A would be visible at any height, due to the proximity of the Site and orientation of the view along Ringers Road. At 11 and 12 storeys in height, Block A would be comparable to the height of the Crest Building. Above 13 storeys the additional

height would provide a step in scale between buildings either side of Ringers Road, as well as a more notable transition in scale with existing buildings on Ringers Road to west of Block A.

6.67 **Figure 13** demonstrates that Block B would also be visible to varying degrees, seen in the context of the flats in the foreground of the view. Block B at 11 and 12 storeys in height would be visible to the same extent as the Crest Building, whilst providing a similar transition in scale between buildings in the foreground of the view. With Block B at 12 storeys in height, it supports the height of Block A extending above 12 storeys, so as to form the centrepiece in the cluster of buildings extending between Block B and the Crest Building and creating a varied skyline.

6.68 Reducing the height of Block A to 15 storeys would establish a more sympathetic relationship with the Crest Building, but the architectural detailing to the upper parts of Block A could address the perception of massing and the height of the building.

6.69 In terms of the future baseline, a small part of 'S2' 66-70 Bromley High Street would be visible between Block A and Block B, relating to the height of Block B.

Viewpoint M: Ethelbert Road

6.70 **Figure 14** demonstrates that the existing view is channelled along Ethelbert Road and along Ravensbourne Road. The composition of the view includes St. Marks Tower, which introduces height in relation to the smaller scale residential properties and a well-defined building form, via its angled roof. Longer distance views are truncated by St. Marks Tower and the rising landform across Ethelbert Road.

6.71 The Site, covering Block B, is visible, forming a slight break in the residential properties adjacent to Ethelbert Road, which are characterised by a consistent scale but varied form.

6.72 Block A would be visible between 7 and 19 storeys. Due to the foreshortening of the view, Block A at 11 and 12 storeys in height would reflect the height of the upper part of St. Marks Tower. Above 12 storeys in height, the increased height of Block A results in a more notable change in scale and a slight reduction in the amount of sky within the view.

6.73 Similarly Block B would also be visible due to the channelled views along Ethelbert Road. The change in scale in relation to the existing properties would be more notable above 10 storeys in height.

6.74 In relation to the future baseline, the Churchill Quarter massing would be present on the opposite side of Ethelbert Road and Block B. The combined heights of these buildings would alter the character of Ethelbert Road, with Block B reflecting the height of the Churchill Quarter massing, before the building heights stepped up in scale to Block A. Similarly, with the S2 development also on Ethelbert Road, the heights of buildings in proximity to the High Street would be taller than the existing context. In this context, both Block A and Block B would form part of the future baseline, reflecting the scale and height of proposed buildings adjacent to Ethelbert Road and to the west of the High Street.

7.0 SUMMARY AND CONCLUSION

7.1 The tall building study has undertaken an assessment of differing building heights (storeys) for Block A and Block B from key viewpoints across Bromley. These key views have been derived from a baseline review of relevant published studies, the generation of Zones of Theoretical Visibility (ZTVs) and fieldwork during winter conditions.

7.2 The analysis for Block A has considered buildings heights ranging between 8 and 19 storeys, to reflect the existing building heights on the opposite side of Ringers Road, as well as to test the opportunity to demarcate this part of the townscape and skyline via a taller building.

7.3 Block B, adjacent to Ethelbert Road, is proposed to be the lower building, to reflect the relationship with Bromley Town Centre Conservation Area and the transition in scale between the Churchill Quarter scheme and the Site. The analysis for Block B has considered building heights ranging between 8 storeys and 12 storeys, to reflect the existing context, pre-application comments from the LBoB, as well as the future baseline of the application for 'S2' 66-70 Bromley High Street, which is proposed at 12 storeys in height.

7.4 The tall building study has demonstrated that the visibility of Block A and Block B would vary from across Bromley due to the combination of intervening buildings, vegetation and landform.

7.5 In longer distance views, including from residential areas to the west of the Site, both Block A and Block B would be visible. The change to the view would be additional tall buildings on the skyline, seen in the context of other tall buildings including the Crest Building on Ringers Road. There would be a very minor reduction in the amount of sky as a result of Block A and Block B. The overall composition of the view would not change, with Block A seen as one of a series of vertical features which already extend above the skyline. In relation to the future baseline, the scale and height of the Churchill Quarter would result in additional massing above the existing skyline, such that Block A would establish a visual relationship with the Churchill Quarter, between 14 to 19 storeys in height.

7.6 In longer distance views, increasing the building heights of Block A and Block B therefore provides the opportunity for demarcating the Site and the transition in the town centre between the High Street and Market Street and establishing a cluster of buildings around Block A.

7.7 In mid-range views, from the northern parts of Bromley High Street, Block A would be visible between 7 and 19 storeys in height. Block A would reflect the existing composition of the view, by forming a focal point in the view and a taller building in comparison to those on the High Street, similar to the Crest Building and the upper part of St Marks Tower.

7.8 The overall composition of the view would remain, with a taller building visible beyond Market Street. The upper parts of Block B, between 10 to 12 storeys would also be visible. These heights would reflect the scale of taller buildings on the High Street, in the foreground of the view.

- 7.9 In relation to the future baseline, the Churchill Quarter would introduce additional height and massing within the view and adjacent to the High Street. This would substantially reduce the visibility of Block B. Block A would remain visible, with the taller height of Block A, at 18 and 19 storeys, reflecting the height of the upper parts of the Churchill Quarter.
- 7.10 In mid-range views, increasing the taller heights of Block A (between 17 to 19 storeys) and Block B (between 11 and 12 storeys) is considered to achieve a varied skyline and a unified arrangement of buildings, demarcating the transition between the High Street and the Market Place.
- 7.11 In close range views, including from Ringers Road and Ethelbert Road, Block A would be visible at any height, due to the proximity of the Site and orientation of the view along Ringers Road. At 11 and 12 storeys in height, Block A would be comparable to the height of the Crest Building. Above 13 storeys the additional height would provide a step in scale between buildings either side of Ringers Road, as well as a more notable transition in scale with existing buildings on Ringers Road, to the west of Block A.
- 7.12 Block B would also be visible to varying degrees in close range views, seen in the context of low rise flats in the foreground of the view. Block B at 11 and 12 storeys in height would be visible to the same extent as the Crest Building, whilst providing a similar transition in scale between buildings in the foreground of the view.
- 7.13 In these close range views, the taller heights of Block A and Block B would result in a notable change in scale in comparison to the existing buildings. Reducing the height of Block A to 15 storeys would establish a more sympathetic relationship with the Crest Building on the opposite side of Ringers Road. Similarly, Block B would establish a more sympathetic relationship with existing buildings at 10 storeys in height on Ethelbert Road.
- 7.14 However, in the context of the future baseline and specifically the Churchill Quarter, the skyline in these close range views would be substantially altered. The Churchill Quarter results in new massing and taller buildings in close proximity to the Site and a clear progression in scale from existing buildings on Ringers Road and Ethelbert Road.
- 7.15 Block B, at 12 storeys would reflect the height of the Churchill Quarter scheme within close range views and Block A would provide visual interest to the skyline by stepping up in height, with 18 and 19 storeys mirroring the height of the Churchill Quarter within close range views. In the context of the future baseline, Block A and Block B are considered to integrate successfully with the skyline of the Churchill Quarter and provide the opportunity for an interesting and varied skyline in close range views.
- 7.16 In conclusion, the Site is considered able to accommodate building heights for Block A at 19 storeys and Block B at 12 storeys in mid to long range views. This is due to existing tall buildings already forming the skyline and that in the context of the future baseline, these heights would align with the future massing of the Churchill Quarter.
- 7.17 In close range views, the taller heights to Block A and Block B would result in a more notable step change in scale in comparison to existing buildings along Ringers Road and Ethelbert Road. However, given the future baseline context of the Churchill Quarter, taller buildings heights for Block A and Block B are considered to be appropriate in townscape and visual terms and would establish a logical and coherent link to the future baseline massing.
- 7.18 Taller building heights for Block A (up to 19 storeys) and Block B (up to 12 storeys) provide the opportunity to create a focal point, a more varied skyline and demarcate the transition between the High Street and Market Street. With the implementation of the Churchill Quarter, Block A and Block B would be part of a coherent cluster of taller buildings in the townscape.
- 7.19 Key to the successful integration of Block A and Block B will be the architectural detailing and materials, particularly the upper storeys of Block A to create a building form which reflects the more articulated buildings within the townscape, such as St. Marks Tower. This detailing is also required to respond to the relevant policy requirements for high architectural design and making a positive contribution to the townscape, in accordance with Policy 47: Tall Buildings.
- 7.20 In the context of the Churchill Quarter development and Bromley's evolving townscape, it is considered that tall buildings, up to 19 storeys in height for Block A and 12 storeys in height for Block B, can be successfully accommodated within the Site.

ETLA

RRB-ETL-XX-00-RP-L-0703

Ringer's Road, Bromley

Tall Building Study

February 2021

Revision 02



Key

- Site Boundary
- ⦿ Viewpoint Locations

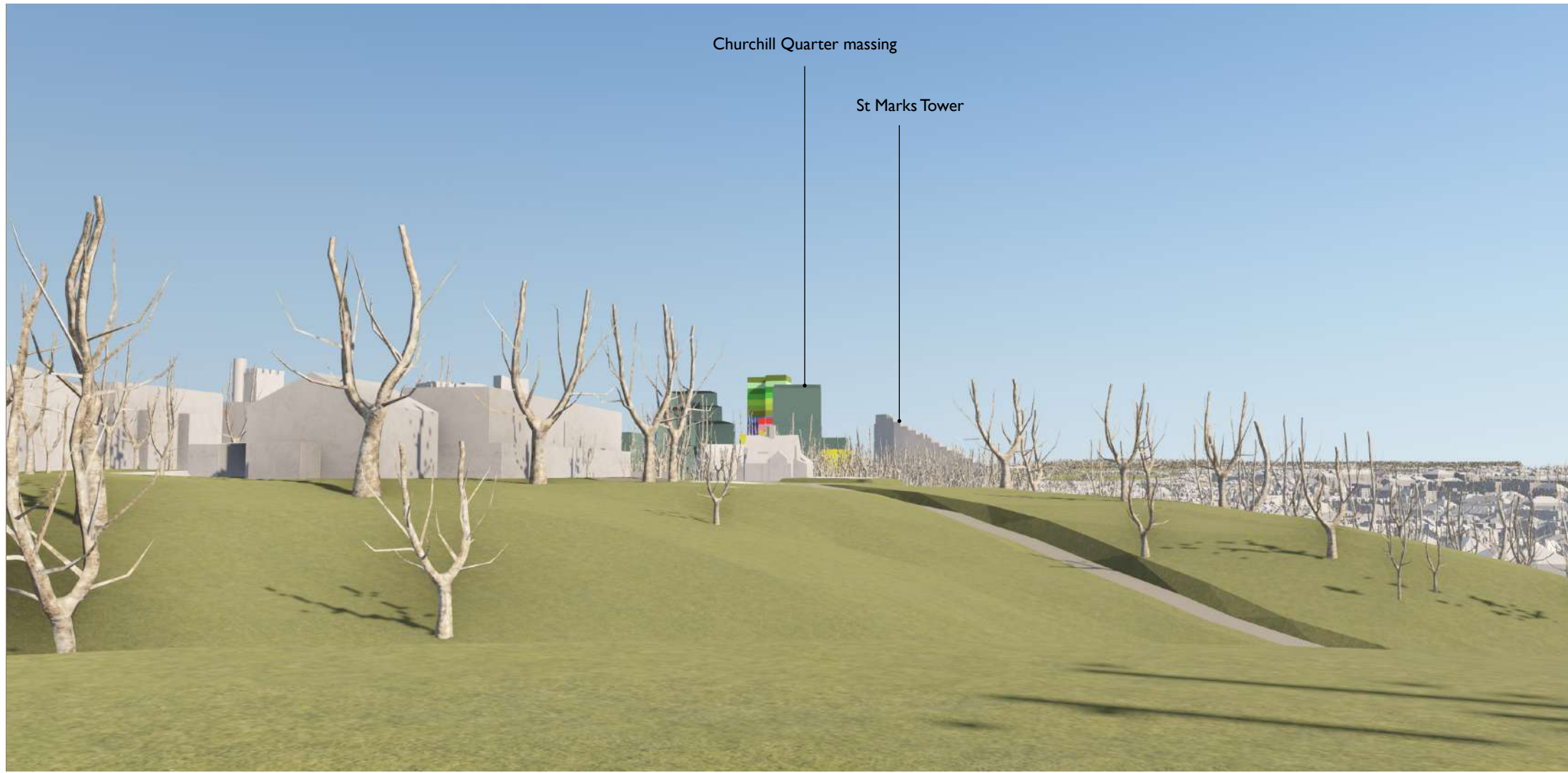
**Bromley Town Centre Area
Action Plan Development Zones**

- Development Zone 1
(Also referred to as the Churchill Quarter)
- Development Zone 2
- Development Zone 3
- Development Zone 4
- Development Zone 5

Relevant Planning Applications

- 'S2' 66-70 Bromley High Street

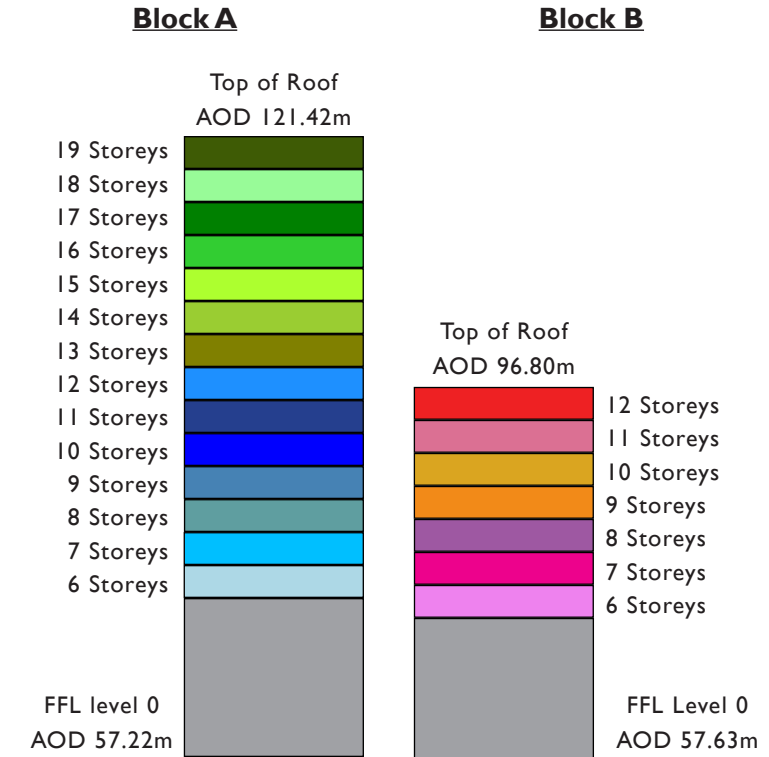
FIGURE -I-



Proposed View (VuCity Extract)

VIEWPOINT A

KEY



Baseline Panorama (for Reference)



Key plan

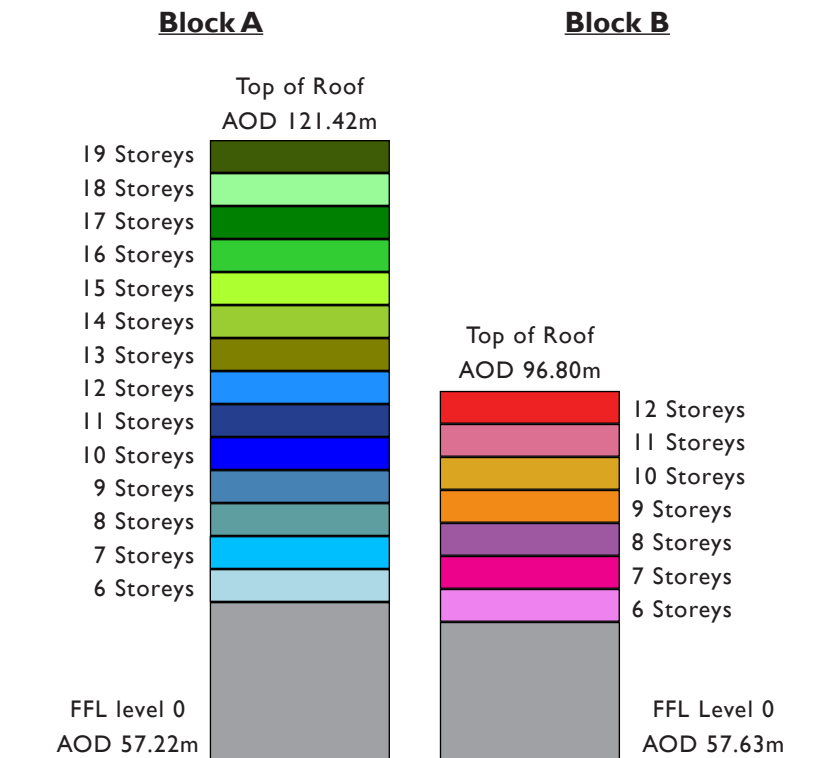
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Date of photographs.	05/12/2020	Northing.	169366.9	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 2 of 14	
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Proposed View (VuCity Extract)

VIEWPOINT B

KEY

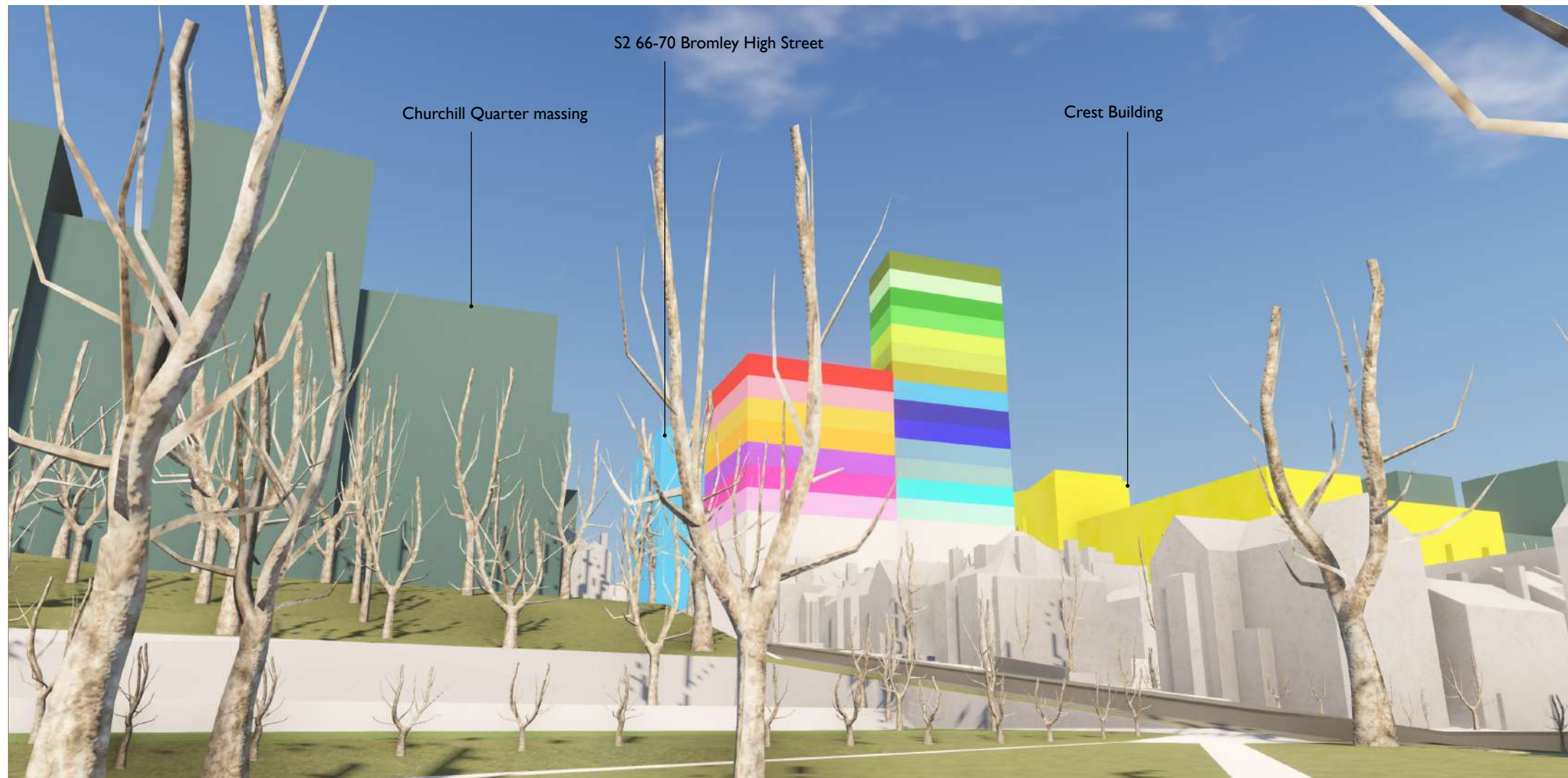


Baseline Panorama (for Reference)



Key plan

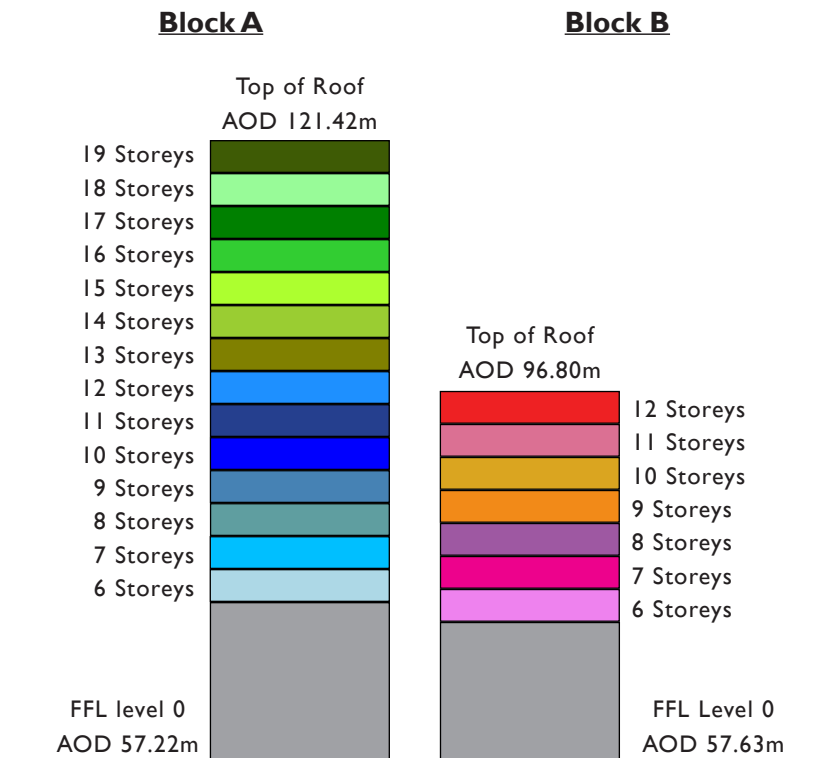
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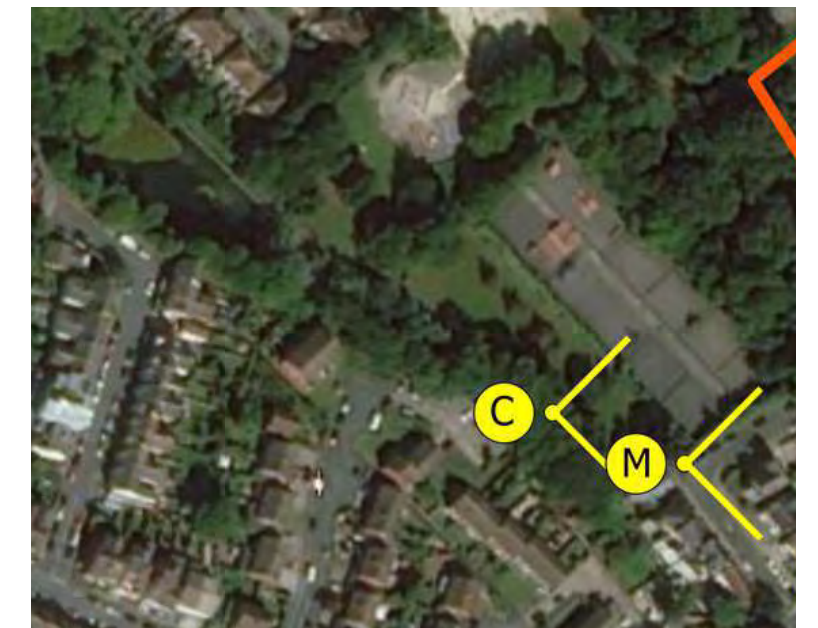
Proposed View (VuCity Extract)

VIEWPOINT C

KEY



Baseline Panorama (for Reference)



Key plan

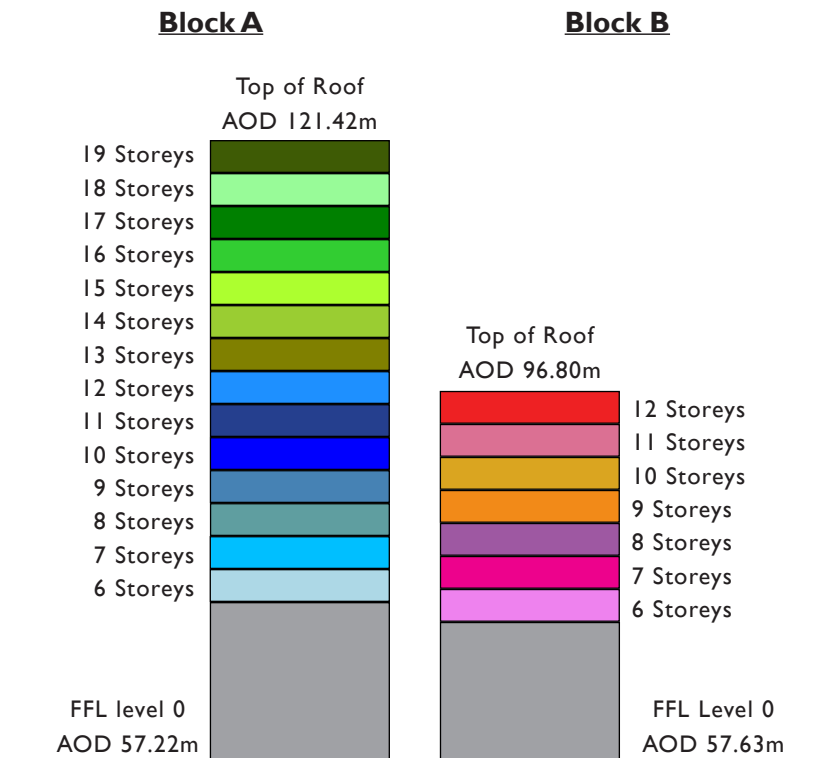
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								Rev. 02	



Proposed View (VuCity Extract)

VIEWPOINT D

KEY



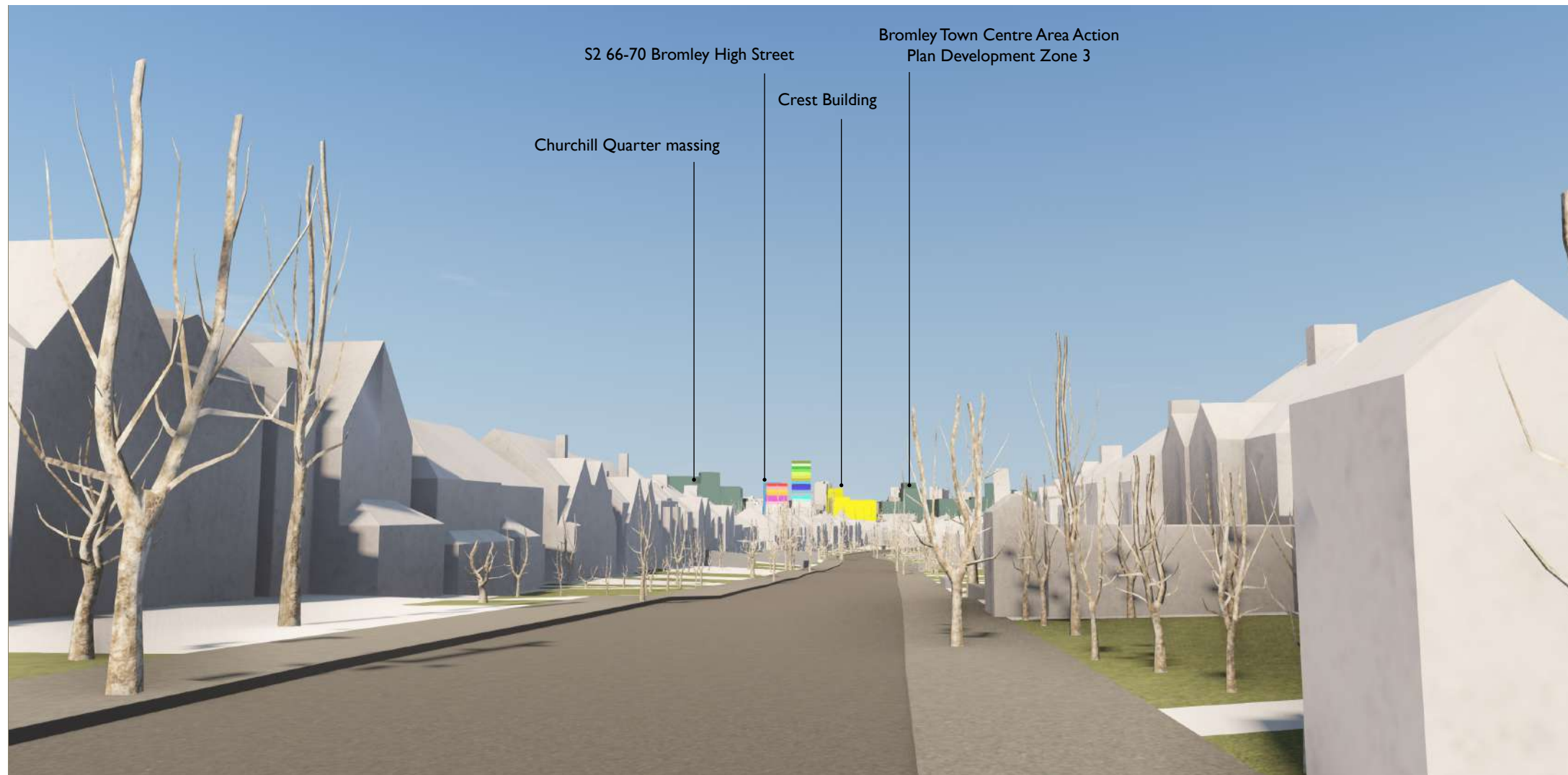
Baseline Panorama (for Reference)



Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			
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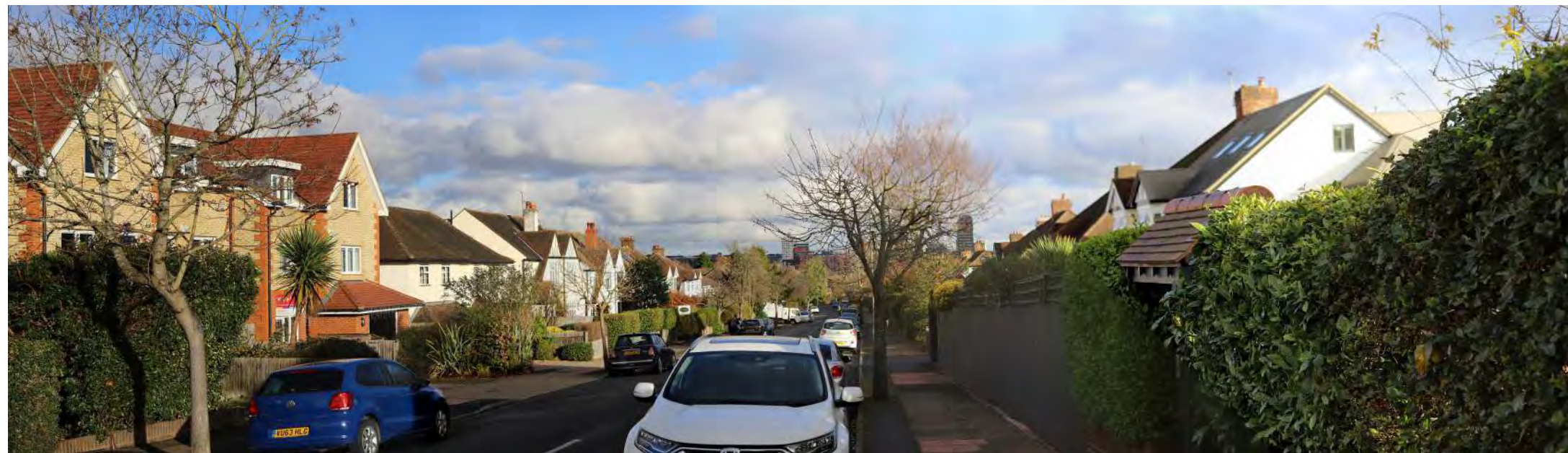
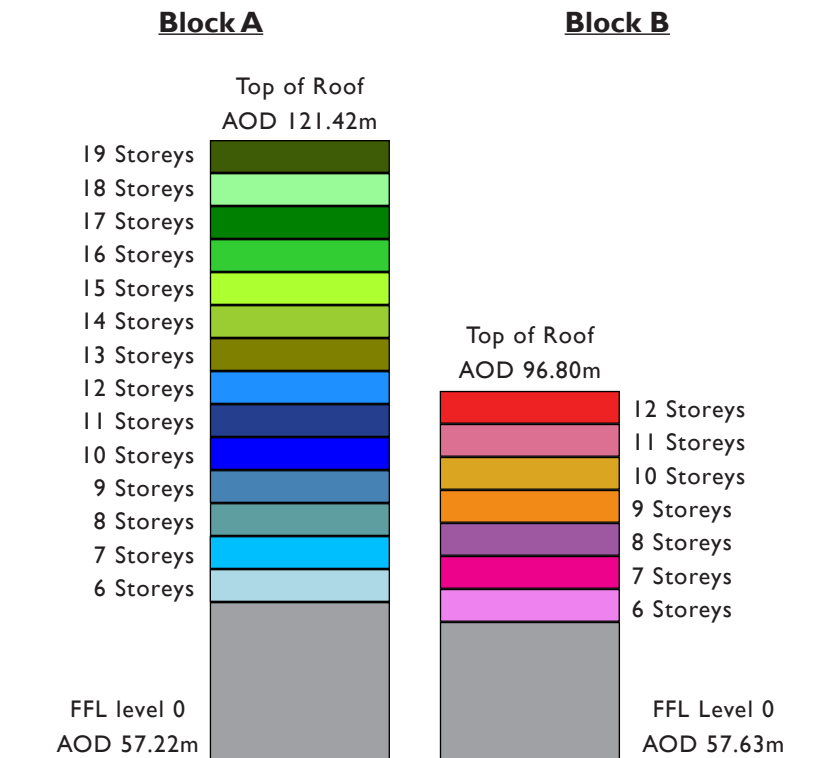
ETLA



Proposed View (VuCity Extract)

VIEWPOINT E

KEY



Baseline Panorama (for Reference)



Key plan

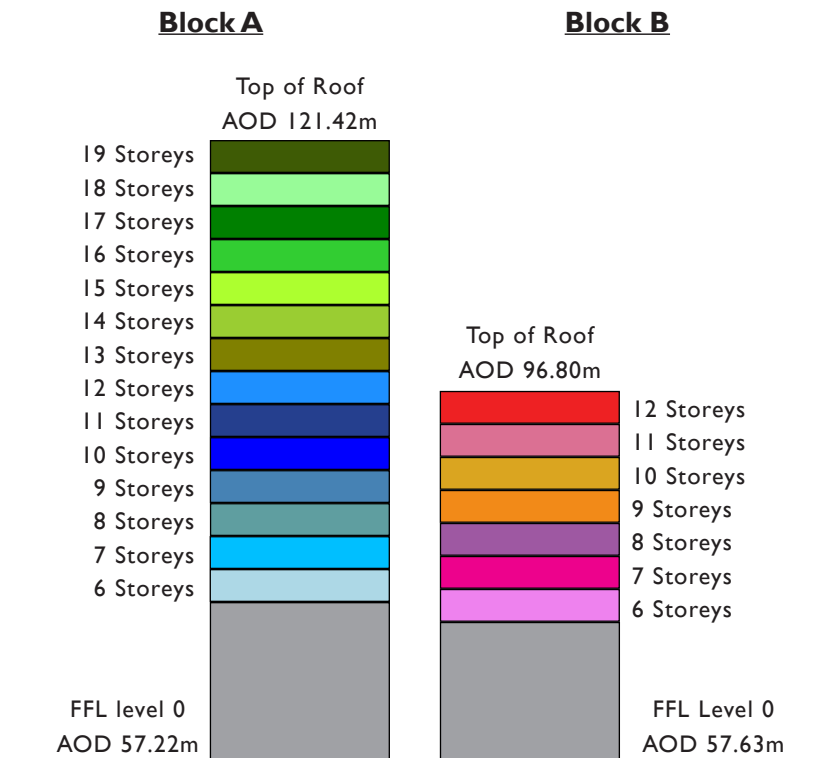
BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	539241.8	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168434.7	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 6 of 14	
Distance from site.	1108.6m	AOD.	63.55017	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	



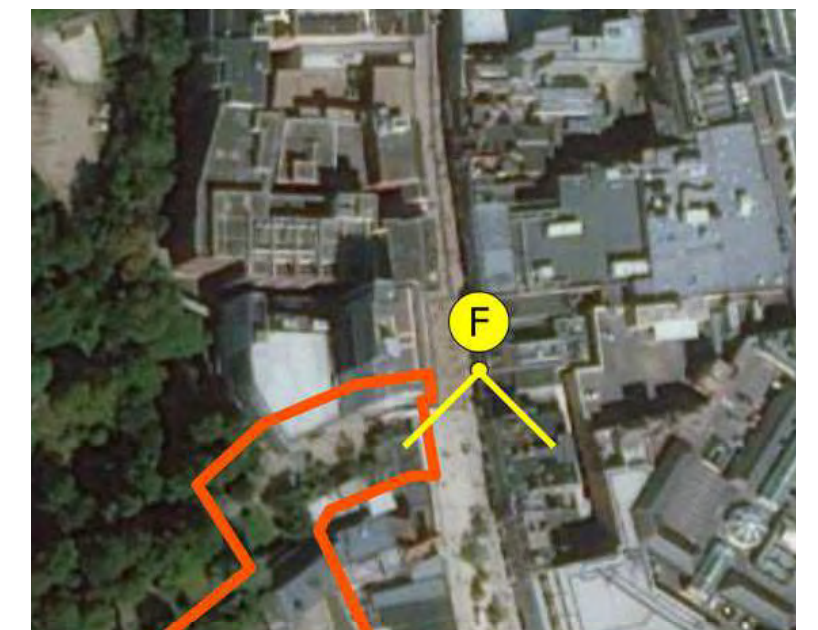
Proposed View (VuCity Extract)

VIEWPOINT F

KEY

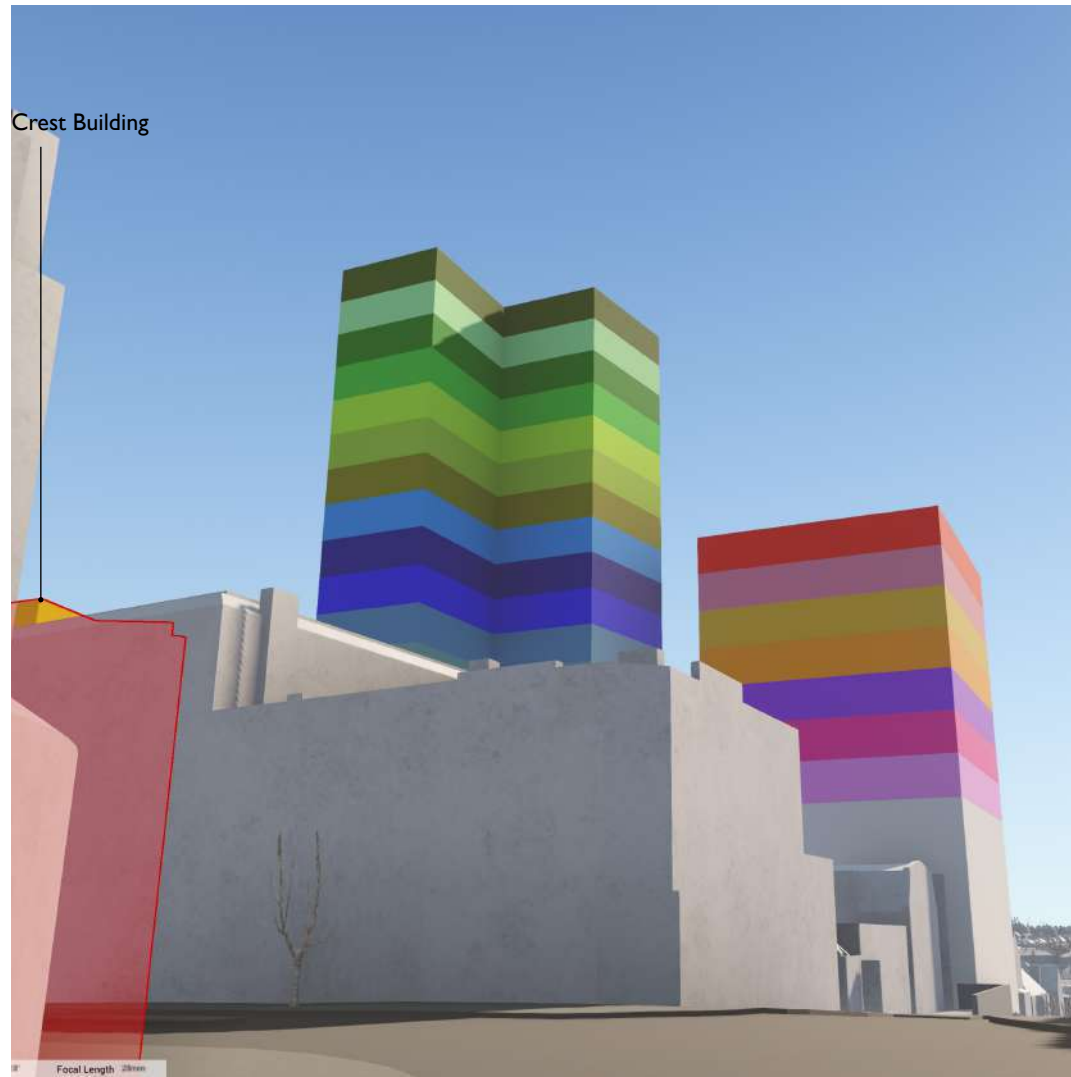


Baseline Panorama (for Reference)



Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	540268.9	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	169132.1	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 7 of 14	
Distance from site.	177.8m	AOD.	65.86301	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	



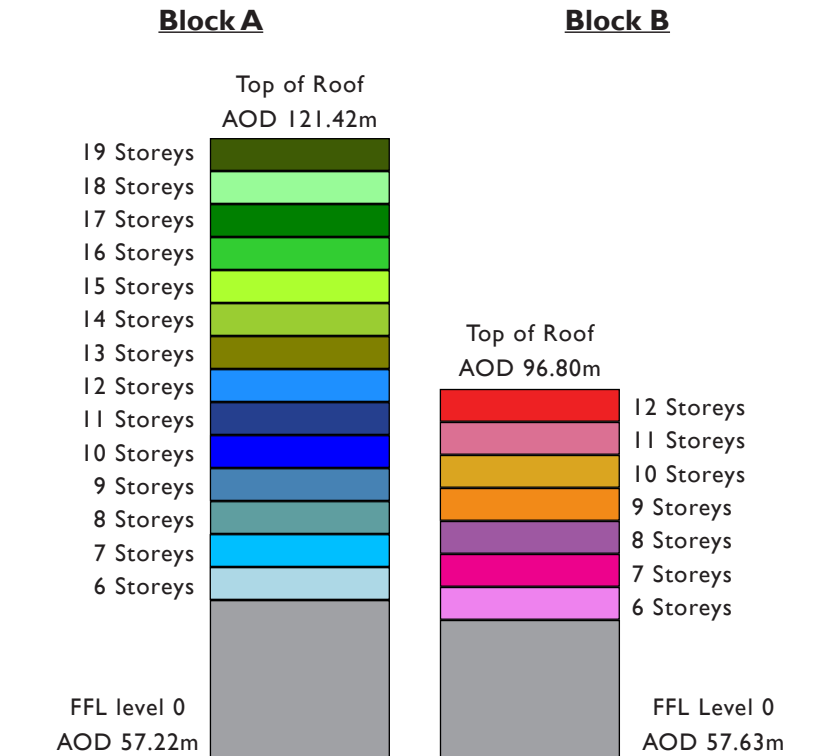
Proposed View excluding cumulative schemes (VuCity Extract)



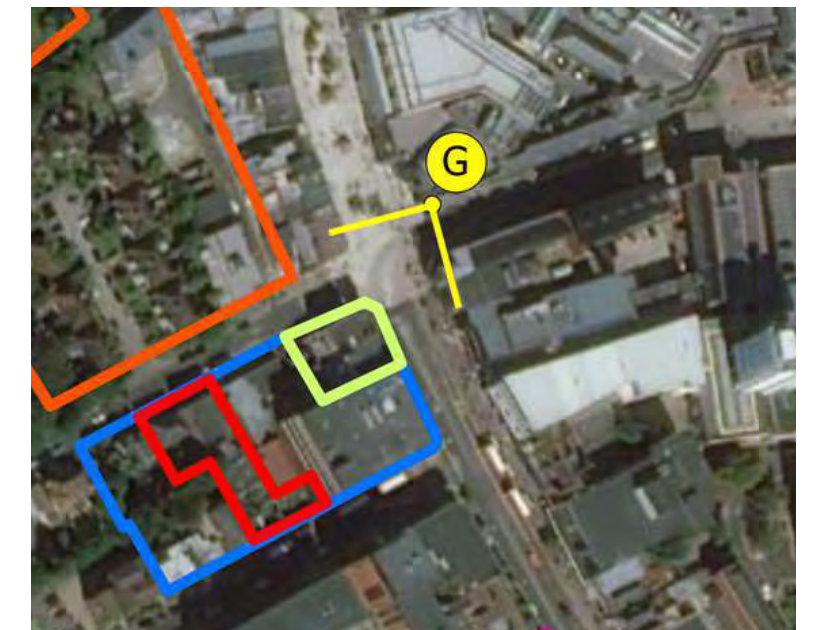
Proposed View including cumulative scheme (VuCity Extract)

VIEWPOINT G

KEY



Baseline Panorama (for Reference)



Key plan

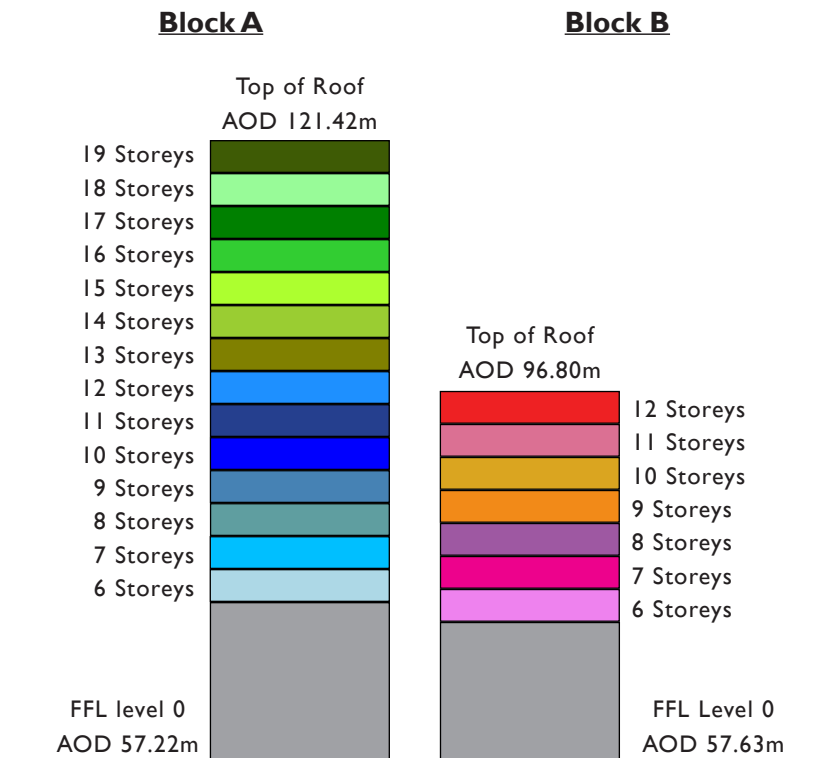
BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	540318.2	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168990.3	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 8 of 14	
Distance from site.	88.6m	AOD.	63.8521	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	
								Rev. 02	



Proposed View (VuCity Extract)

VIEWPOINT H

KEY



Baseline Panorama (for Reference)

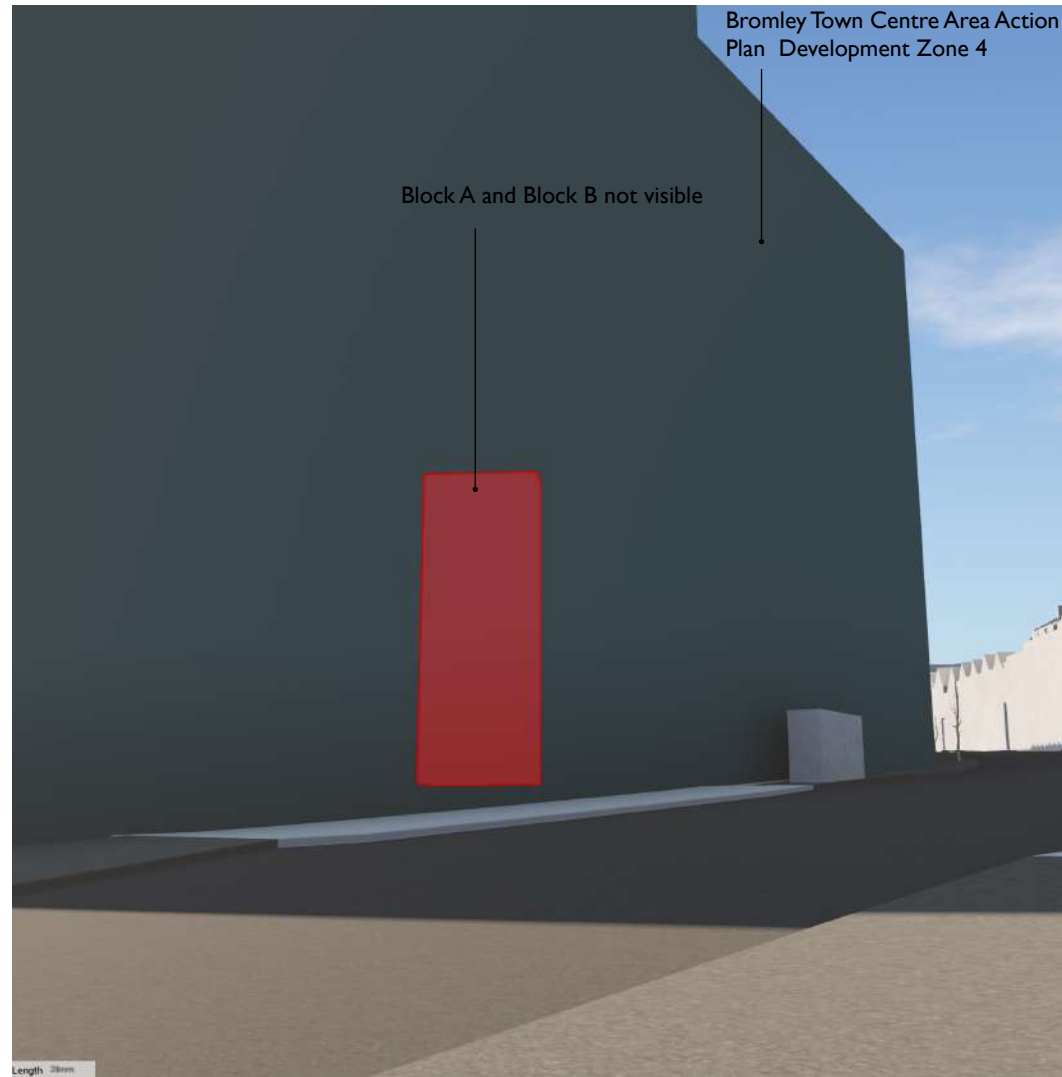


Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	540837.8	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168956.1	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 9 of 14	
Distance from site.	554.3m	AOD.	53.08195	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	



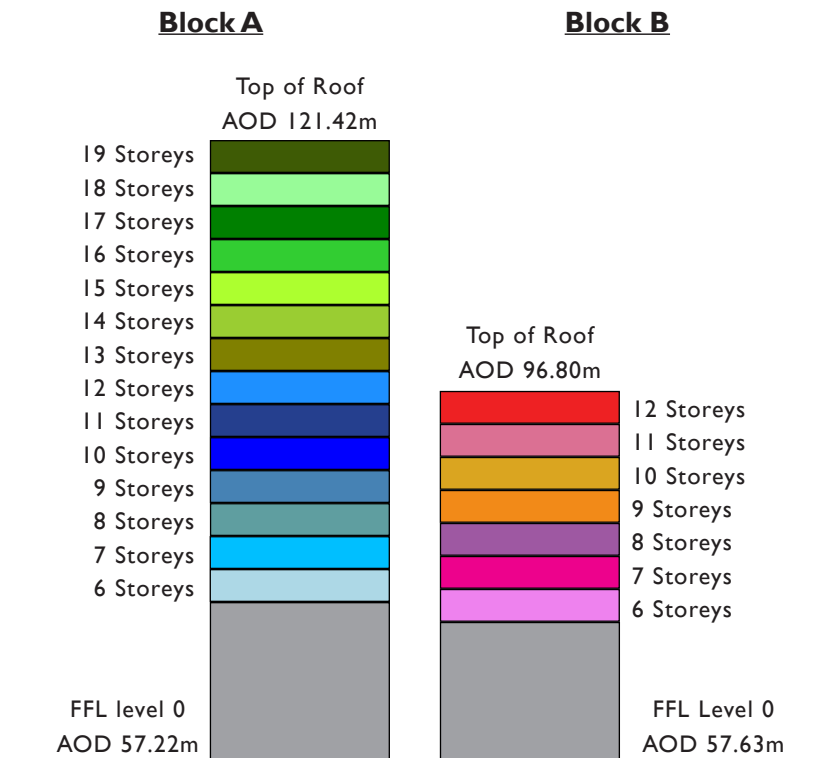
Proposed View excluding cumulative schemes (VuCity Extract)



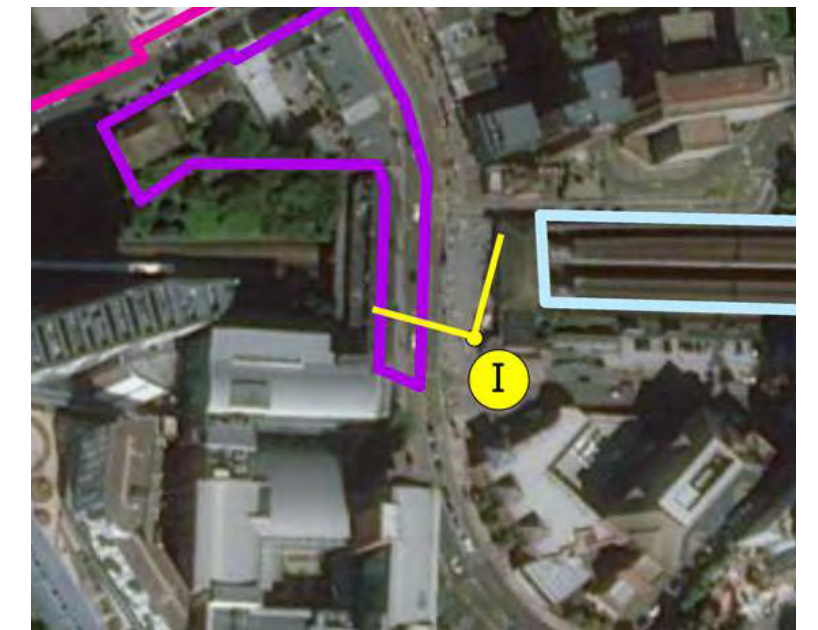
Proposed View including cumulative scheme (VuCity Extract)

VIEWPOINT I

KEY



Baseline Panorama (for Reference)



Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model.	Canon EOS 6D Mark II	Easting.	540414	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168684.5	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 10 of 14	
Distance from site.	252.9m	AOD.	52.49634	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	Rev. 02

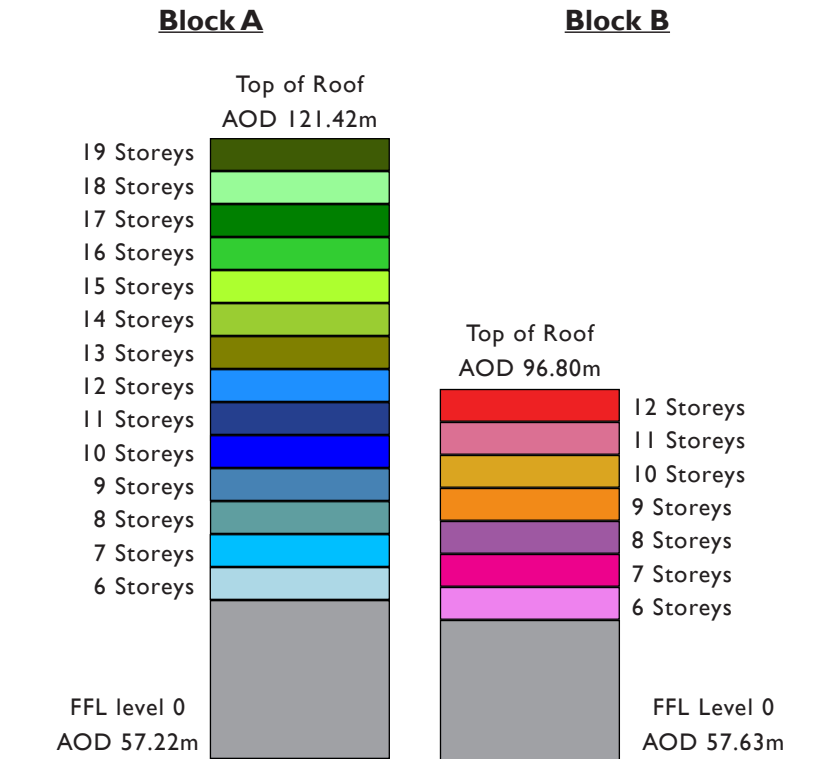
ETLA



Proposed View (VuCity Extract)

VIEWPOINT J

KEY



Baseline Panorama (for Reference)



Key plan

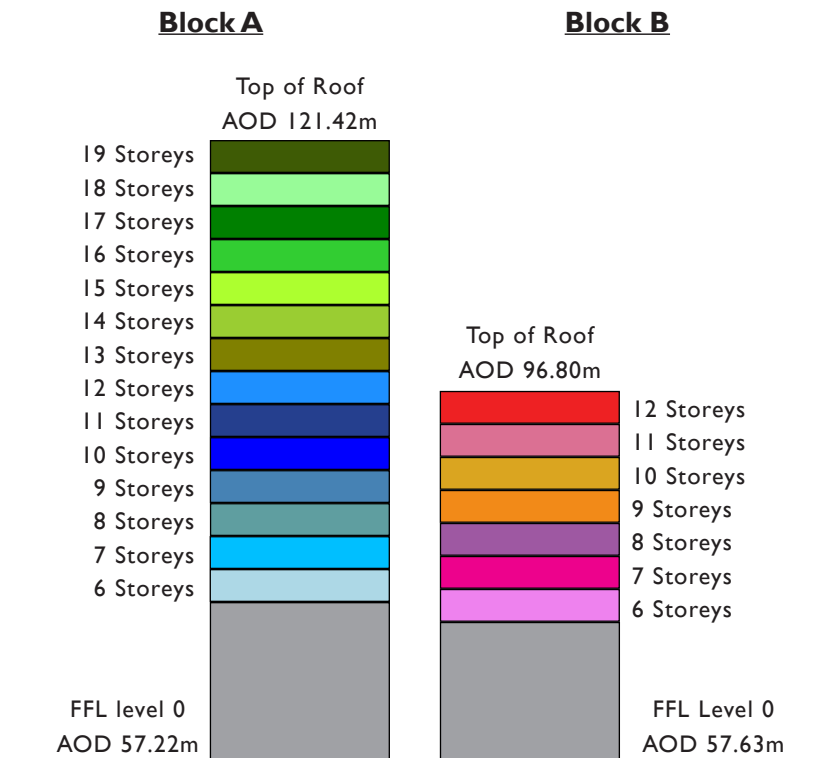
BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	540709.9	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168478.1	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 11 of 14	
Distance from site.	578.5m	AOD.	57.34748	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	



Proposed View (VuCity Extract)

VIEWPOINT K

KEY



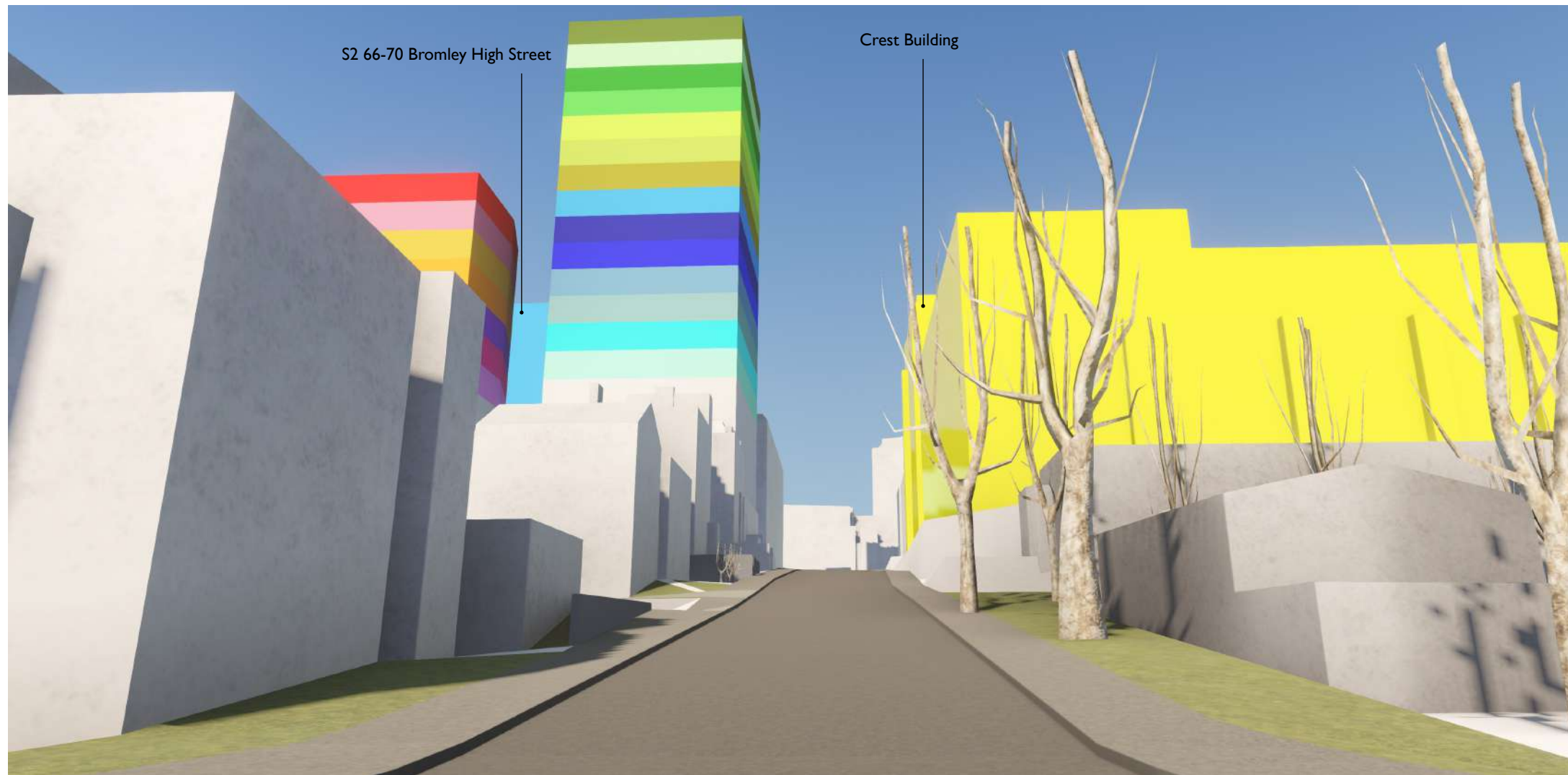
Baseline Panorama (for Reference)



Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model.	Canon EOS 6D Mark II	Easting.	540257	Focal Length.	50 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168288.3	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 12 of 14	
Distance from site.	590m	AOD.	46.01704	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	Rev. 02

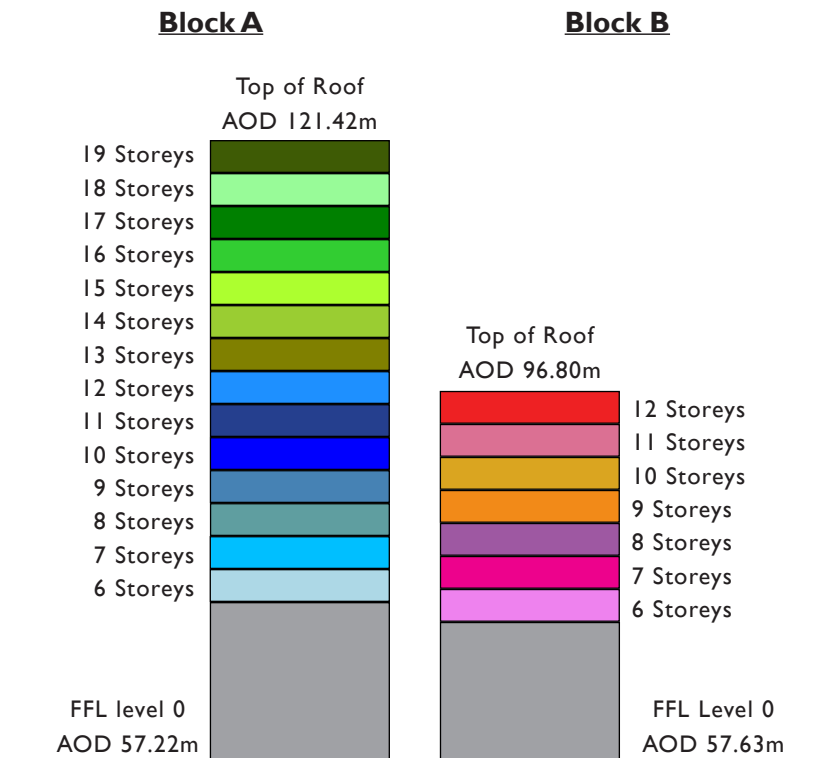
ETLA



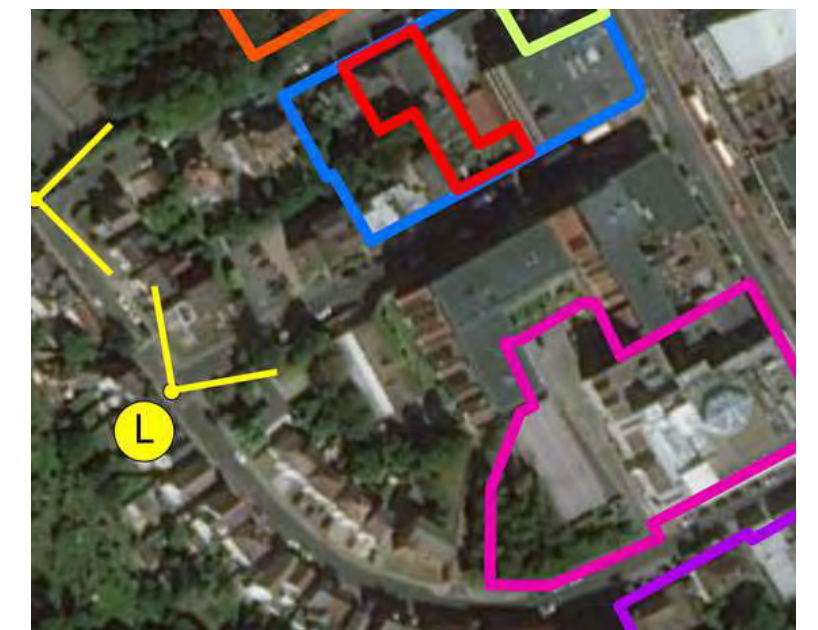
Proposed View (VuCity Extract)

VIEWPOINT L

KEY



Baseline Panorama (for Reference)



Key plan

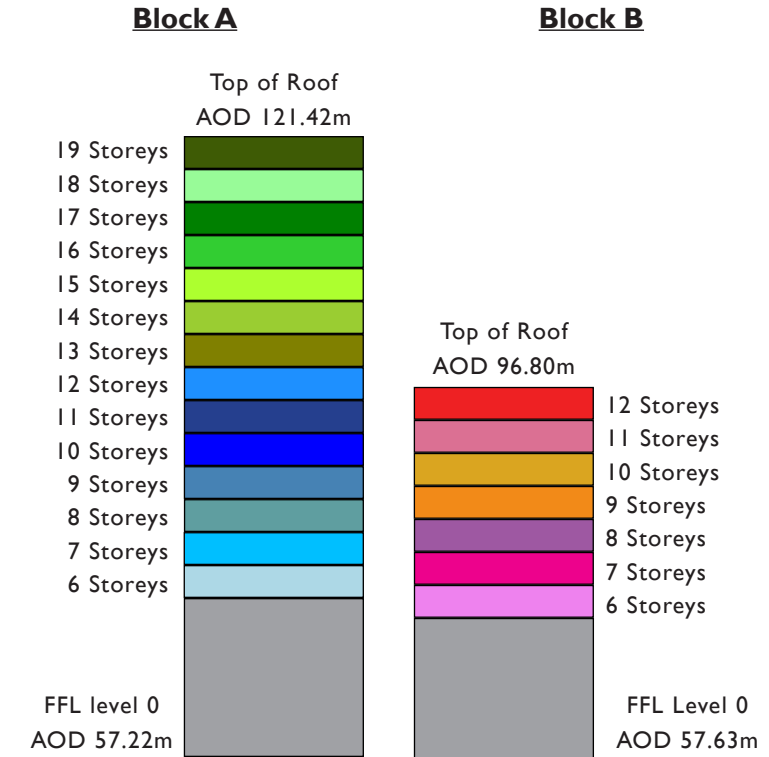
BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model.	Canon EOS 6D Mark II	Easting.	540162.9	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168821	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 13 of 14	
Distance from site.	109.3m	AOD.	47.12765	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	



Proposed View (VuCity Extract)

VIEWPOINT M

KEY



Baseline Panorama (for Reference)



Key plan

BASELINE PANORAMA		VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model.	Canon EOS 6D Mark II	Easting.	540119.2	Focal Length.	28 mm	Project Title. Ringer's Road		RRB-ETL-XX-00-RP-L-0703	
Date of photographs.	05/12/2020	Northing.	168882.8	Visualisation Type.	Type 3	Drawing Title. Tall Building Study		Figure Number 14 of 14	
Distance from site.	104.6m	AOD.	46.99	Height from Ground.	1.6m	Drawn By. AA	Approved By. KF	Date. 12/02/2021	Rev. 02



Scheme Model.	21.01.29 - Ringers Road Site Model
Scheme Plan.	18.085 - Ringers Road - Site Plan & Future MasterplanScheme
Scheme Sections.	18.085.220.02_Ringers Road_Site Section C-C
Topographical Survey.	2267 01 Rev A

OVERVIEW

ETLA were appointed by The Substantia Group to undertake a Tall Building Study in respect of land at Ringers Road. The focus of the Tall Building Study is two new residential buildings at the Site consisting of Block A, adjacent to Ringers Road and Block B, adjacent to Ethelbert Road. The Study has been undertaken with supporting visualisations using VU.CITY (more info in section 1.0 Introduction of the report). VU.CITY has created the largest and most accurate interactive 3D digital model of London. Covering the whole of London and Bromley – 1,617 sq km – including every building, road, tree and public space and is accurate to within 15 cm.



Screengrab from VU.CITY London

3D MODELLING

The modelling of Blocks A and B was executed in SketchUp Pro 2020. Model coordinates were based on the drawings provided by the architects along with the surveyor. Block A corner was taken as an **origin point** (see screengrab). Eastings and Northings of the origin point were identified using the topographical survey. The AOD of the origin point was identified using the sections drawing which showed the FFL AOD. The modelling of the cumulative schemes was provided by Holloway Architects and was based on the **'Bromley Town Centre - Site G/10 - Masterplan - July 2018'** document.



Origin point on corner of Block A

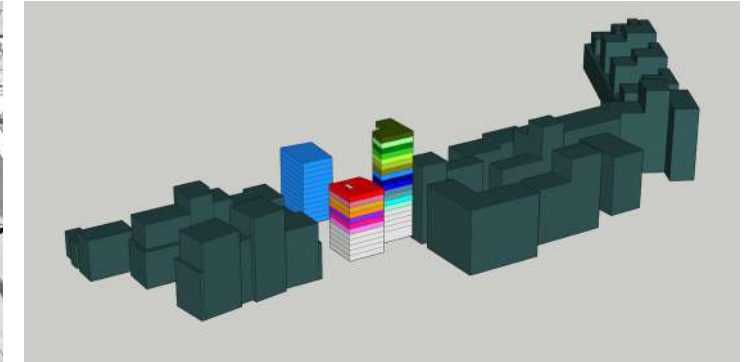
The colours were then assigned to each floor within each of the proposed massing for Block A and B, with Block A illustrated with a cool colour palette and Block B illustrated with a warm colour palette. Each floor was modelled at 3.2m.

In order to geolocate the model, the origin point at block A was moved to match with SketchUp's Point of Origin (0,0,0). This procedure allows SketchUp models to be imported and placed correctly in VU.CITY and is usually referred to as 'zeroing' a model.

The model was then exported in FBX format to be imported to VU.CITY.



The 3D model as received by Holloway Architects



Model setup complete and ready to be exported to VU.CITY

CAMERA SETUP

The model was imported to the VU.CITY environment using the following coordinates for the origin point:

Eastings: **540251.4** Northings: **168884.5** AOD: **57.22**

The camera points were then manually plotted to be as close as possible to the views taken during a site visit. There is inevitably some variation in the views given that Vu.City does not have a camera matching option available.



Imported mass model in VU.CITY

18.0 APPENDIX 6: LIKELY TOWNSCAPE EFFECTS

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
National: Natural England National Character Area (NCA)						
NCA 113: North Kent Plain (covers the Site)	<p>Value</p> <p>There is a strong cultural association associated with the Kent fruit belts, along with extensive areas of ancient woodland, such that the value of the NCA is assessed as high.</p> <p>Susceptibility</p> <p>As the NCA contains settlements (including Bromley) and the published study notes the “strong urban influence”, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the high value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would be located within Bromley, in which the published study notes there is a ‘strong urban influence’. The Proposed Development would be perceived in the context of other tall buildings within Bromley (Crest Building, Churchill Theatre, St Marks Tower and Perigon Heights). The Proposed Development would provide a higher architectural quality to Ringers Road and the Ethelbert Road and adjacent to the conservation area, thereby responding positively to the Statements of Environmental Opportunity by enhancing the character of the urban areas. Due to the position of the Proposed Development within Bromley and its relatively small scale in relation to the wider extent of the NCA, there would no change to the key characteristics of the NCA.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter, Bromley town centre would consist of taller buildings, specifically in proximity to the Site, such that the skyline would be substantially altered in comparison to the existing baseline. The Proposed Development would therefore be integrated within a townscape of taller buildings and remain a very small part of the wider NCA, along with its perception remaining part of Bromley, such that there would be no change to the key characteristics of the NCA.</p>	Neutral	No Change	Neutral	No Change
Borough: (Bromley Town Centre Area Action Plan (BTCAAP))						
BTCAAP Bromley Central (covers the Site)	<p>Value</p> <p>This is a retail area extending to the east and west of the High Street, including both the vehicular and pedestrianised parts of the High Street. The scenic quality is varied but there is a cultural association via the market area and the Conservation Area in part. Open space is limited to Queens Gardens. The value is therefore assessed as medium.</p> <p>Susceptibility</p> <p>As a town centre, which consists of a range of building styles and heights, including extensive massing at the Glades and parts of the area are identified for extensive redevelopment via the BTCAAP. Therefore the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Both Block A and Block B would taller than the existing buildings on Site.</p> <p>Block A would be ground plus 13 storeys, with the horizontal form of the roof at +102.62 AOD. There would be localised taller structure via the lift over-run atop of the roof at +103.32 AOD. Block A would extend above the T K Maxx building at +77.51n AOD and no.6 Ringers Road at +69.09 AOD.</p> <p>Block B would be ground plus 11 storeys, with the tallest part of the building at +97.33 AOD. This is in relation to the Salvation Army building on Ethelbert Road (to the immediate west of Block B) at +68.29 AOD and the residential properties (to the immediate west of Block B) at +63.68 AOD.</p> <p>The height of Block A would be perceived locally within the character area, including at the junction of Market Square and the High Street, and on the approach along the High Street from Bromley South railway station.</p> <p>The stepped heights of the Proposed Development would reflect the massing and form of the Crest Building on the opposite side of Ringers Road. The overall horizontal form to Block A and Block B would reflect the form of The Churchill Theatre, The Mall Tower and the tall Bank of America buildings adjacent to Elmfield Road. The stepped form of Block A and Block B would provide visual interest and reduce the overall perceived massing of the Proposed Development.</p> <p>The scale and form of the Proposed Development would reinforce the character area as the main core of Bromley and the contextual position of the transition between the pedestrianised and vehicular parts of the High Street.</p> <p>The varied finishes to the ground floors of Block A via louvered cladding, concrete and planters would provide visual interest and additional vegetation to Ringers Road. The louvers and concrete piers on the ground floor of Block A would align with the height of the ground floor of the TX Maxx building. The concrete piers would extend vertically across the lower façade of Block A to form a stepped string course, which would rise to meet the equivalent roof height of buildings adjacent Block A on Ringers Road.</p> <p>The ground floor and lower storeys of Block B would response to the streetscape via new planters to increase the vegetation along Ethelbert Road, brick to reflect existing building materials and aluminium glazing to define the lower part of the building. The articulation across Block B would consist of a rhythm of vertical and horizontal bands of brick, again to reflect local materials and provide detailing to the façade. The bands of brick would frame the arrangement of windows across the main part of the façade on Ethelbert Road. The perceived mass of the upper two storeys to Block B would be reduced by the stepped arrangement and the glazing panels.</p>	Low	Minor Beneficial	Negligible	Negligible Beneficial

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
		<p>Block A and Block B would respond positively to the stated BTCAAP character area guidelines of 'encouraging active edges to the street frontages' via the use of these materials and the articulation to the buildings.</p> <p>The lower height of Block B and the stepping down in scale from Block A, would respond positively to the Conservation Area to the north and the transition in the character area to the vegetated grounds of Church House gardens, in accordance with the guidelines to respond to these designations.</p> <p>The Proposed Development is adjacent to an identified as a tall building location. The visual assessment has demonstrated the effects in relation to the High Street, Conservation Area and residential areas to the west would be beneficial. Therefore the height of the Proposed Development is assessed as according with the identified principle of a tall building to the west of the High Street in this part of the character area.</p> <p>The change from the Proposed Development would be the introduction of taller buildings of high architectural quality. This would improve the perception of the character area and architectural quality of the character area, in keeping with the scale of the Crest Building on the opposite side of Ringers Road, such that the Proposed Development would be part of consolidated group of taller buildings.</p> <p>The stepped form to the massing and the reduced perception of the scale of the Block A and Block B via the materials would ensure the Proposed Development was not dominant in the character area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter, the Proposed Development would be integrated into a townscape consisting of taller buildings. Block A would reflect the scale of buildings across the southern part of the Churchill Quarter, with the stepped arrangement across Block A and Block B mirroring the stepped arrangement across the Churchill Quarter massing.</p>				
BTCAAP The Northern Gateway	<p>Value</p> <p>The northern gateway consists of Bromley North railway station and there is a varied scenic quality to the architecture, such that the value is assessed as low.</p> <p>Susceptibility</p> <p>Due to the infrastructure and extent of development the area is assessed as being able to accommodate change and the susceptibility is moderate.</p> <p>Sensitivity</p> <p>The combination of the low value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located within this character area, which is located at the northern edge of Bromley Town Centre and therefore there would be no physical change to the character area. The perception of the Proposed Development would be in the context of the Crest Building.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter the perception of the Proposed Development would be reduced, becoming part of new land uses and taller buildings within the town centre. As a result, there would be no change to the character of the Northern Gateway.</p>	Neutral	No Change	Neutral	No Change
BTCAAP The North Village	<p>Value</p> <p>There is a cultural value to this area due to Bromley College with its architecture and vegetation providing a localised scenic quality and the value is assessed as medium.</p> <p>Susceptibility</p> <p>Due to the generally consistent scale of buildings across the area, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the medium value and the moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located in this character area, which covers the northern part of the High Street, between Market Square and Bromley College. The perception of the Proposed Development would be limited due to the alignment of the street pattern and density of the buildings adjacent to the road networks. The perception of the Proposed Development would reflect that of the existing perception of this part of the townscape and the Crest Building and St. Marks Tower, which are perceived as focal points beyond the character area, such that there would be no change to the character of the area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter the perception of the Proposed Development would be reduced, becoming part of new land uses and taller buildings within the town centre. As a result, there would be no change to the character of the North Village as a result of the Proposed Development.</p>	Neutral	No Change	Neutral	No Change
BTCAAP Western Edge	<p>Value</p> <p>There is a cultural association via the Conservation Area and a high recreational value via parts of</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located in this character area, which is to the west of the Site, covering the western part of the Ethelbert Road and Ringers Road and extending across</p>	Negligible	Negligible Beneficial	Neutral	No Change

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>Church House gardens. The value is therefore assessed as high.</p> <p>Susceptibility Due to the predominance of open space and consistent scale and pattern of properties adjacent to Ravensbourne Road the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Church House gardens. Therefore there would be no physical change to the townscape character area.</p> <p>The Proposed Development would be perceived due to its height and proximity, demarcating a change in scale in relation to residential properties adjacent to Ethelbert Road, Ringers Road and Ravensbourne Road. However, the Proposed Development would be perceived in the context of the Crest Building and taller buildings bordering the character areas, e.g. the Churchill Theatre and St. Marks Tower and improve the architectural setting to the character area.</p> <p>Operation Year 1 (winter) Future Baseline With the implementation of the Churchill Quarter, the perception of the Proposed Development would be reduced, with it forming part of a wider area of taller buildings adjacent to the character area, such that the Proposed Development would not alter the character of the area.</p>				
BTCAAP Civic Centre	<p>Value There is cultural value as the location of the old palace but the scenic quality is low and the value is assessed as low.</p> <p>Susceptibility As areas of larger scale massing the susceptibility is assessed as low.</p> <p>Sensitivity The combination of the low value and low susceptibility results in a low sensitivity.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located within the character area and therefore there would be no physical change to the Civic Centre. The Proposed Development would be perceived in the context of the High Street and part of the larger scale massing between the character and the Site, which includes taller buildings on Elmfield Road, the Mall Tower and the Glades which form the immediate setting to the character area. Due to this, there would be no change to the character of the area.</p> <p>Operation Year 1 (winter) Future Baseline With the future baseline introducing taller buildings to the west of the High Street, the perception of the Proposed Development would reduce and as per the existing baseline, there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
BTCAAP: Bromley South	<p>Value There is a scenic quality via taller buildings, along with cultural association with Bromley South railway station and locally listed buildings. The value is assessed as medium.</p> <p>Susceptibility As an area of tall buildings and rail infrastructure, the susceptibility is assessed as low.</p> <p>Sensitivity The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located within this character area and there would be no physical change. The Proposed Development would be perceived in the context of tall buildings within the character area, which includes St. Marks Tower. Due to the dominance of the railway and these taller buildings the Proposed Development would not alter the character of the area.</p> <p>Operation Year 1 (winter) Future Baseline With the future baseline introducing taller buildings to the west of the High Street, the perception of the Proposed Development would reduce and as per the existing baseline, there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
Borough: Conservation Area Statements						
Bromley Town Centre Central (Pedestrianised) High Street	<p>Value As a conservation area the value is high.</p> <p>Susceptibility As an area of open space and buildings, the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located within the CA and therefore there would be no physical change to the stated varied built character, nor the unifying effect of the pedestrianised street. The Proposed Development would be perceived from the CA due to the height of Block A and in part the height of Block B. The published Conservation Area noted that the views south from the High Street are terminated by existing buildings. The perception is of the Conservation Area bordered by taller massing, including the Crest Building and the upper parts of St. Marks Tower which are perceived as focal points beyond the Conservation Area.</p> <p>The Proposed Development would reflect this perception by reflecting the height of the Crest Building. The high quality of the architectural materials and form of the building would be beneficial in townscape terms to the setting of the Conservation Area in comparison to the two existing buildings within the Site. The Proposed Development would be in keeping with the context of taller buildings on Ringers Road and be perceived as part of a cluster of taller buildings, such that it would not alter the character area.</p> <p>Operation Year 1 (winter) Future Baseline With the implementation of the Churchill Quarter, which is adjacent to the southern part of the Conservation Area, the context to the Conservation Area would be notably altered by the introduction of taller massing. The Proposed Development would form part of this taller massing and therefore its perception would be lessened in comparison to the existing baseline.</p>	Neutral	No Change	Neutral	No Change

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
Ravensbourne Valley	<p>Value As a conservation area the value is high.</p> <p>Susceptibility As an area of open space and buildings, the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located in this part of the Conservation Area and there would be no change to the vegetated character of recreational land use of Church House Gardens and Martin's Hill.</p> <p>Operation Year 1 (winter) Future Baseline With the implementation of the Churchill Quarter there would be a substantial alteration to the skyline, such that the perception of the Proposed Development would be reduced and there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
Shortlands Village Character Area	<p>Value As a conservation area and a golf course with a recreational value, the value is high.</p> <p>Susceptibility As an area of a close knit street layout and a golf course, the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located in this part of the Conservation Area and there would be no change to the recreational land use of the golf course nor the street pattern. Views would also remain across to Martin's Hill, wooded skylines and landmarks on the skyline.</p> <p>Operation Year 1 (winter) Future Baseline With the implementation of the Churchill Quarter there would be a substantial alteration to the skyline, such that the perception of the Proposed Development would be reduced and there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
ETLA Local Townscape Character Types (LTCT) and Areas (LTCA)						
LTCT 1: Bromley	<p>Value As the area consists of Conservation Areas and large open spaces which provide a recreational value, in combination with a coherent pattern of residential land uses and taller retail and commercial land uses, the value is assessed as medium.</p> <p>Susceptibility As the BTCAAP has identified areas of the town centre for redevelopment and the Site is located adjacent to an area identified as a tall building location, the susceptibility is assessed as low.</p> <p>Sensitivity The combination of the medium value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would be located in the town centre and would replace existing buildings of very low architectural quality with two new buildings of a higher architectural quality via their form and building materials. Block A would be up to three storeys taller than the Crest Building on the opposite side of Ringers Road, but would be located in close enough proximity to the Crest Building to be perceived as part of a group of taller buildings. The Proposed Development would also demarcate a part of the townscape which forms the transition between the High Street and Church House gardens. The Proposed Development would retain the alignment of the street pattern along Ringers Road and Ethelbert Road. The height of Block A and Block B would be in a part of the townscape where the Crest Building already introduces height within the townscape, with the perception be localised to the central and southern parts of the LTCT.</p> <p>Operation Year 1 (winter) Future Baseline With the implementation of the Churchill, the townscape to the west of the High Street would be notably altered, via the introduction of new taller buildings, including extensive residential land uses. The Proposed Development would form an integrated part of this change, both in terms of land uses and building form, via Block B reflecting the massing of the southern part of the Churchill Quarter and Block A forming the central massing between the Churchill Quarter and the Crest Building. Therefore, the Proposed Development would not alter the character of the LTCT.</p>	Negligible	Negligible Beneficial	Neutral	No Change
LTCA 1: Residential Town Centre	<p>Value This is not a designated townscape but there is some distinctiveness in the detailing to the facades of the Victorian townscape, such that the value is assessed as medium.</p> <p>Susceptibility there is a consistent scale to most of the properties across the area, being two storey in height. Part of the area is identified within the Bromley Town Centre Area Action plan to be replaced by the Churchill Quarter, such that the susceptibility is moderate.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be located within the character area which covers Ethelbert Close to the north of the Site and residential land uses to the west. The Proposed Development (Blocks A and Block B) would be perceived due to their height and proximity and would result in a change in building scale, but not uncharacteristic given the change between two to three storey heights of existing properties is already defined by the Crest Building.</p> <p>The Proposed Development would be perceived in the context of the Crest Building which already defines a transition in building heights and scale in comparison to the lower heights of residential properties on Ringers Road and Ethelbert Road. The materials and detailing to the Proposed Development would reduce the perceived mass and height of both Block A, via the extent of windows across the upper storeys and stepped form of Block A and Block B. The Proposed Development would introduce buildings of higher architectural quality in proximity to the LTCA which would result in a slight alteration to the character of the area.</p>	Low	Minor Beneficial	Negligible	Negligible Beneficial

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>Sensitivity</p> <p>The combination of the combination of the medium value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter scheme, the character area would be bordered by taller buildings with part of the character itself replaced by the Churchill Quarter. Therefore the change in scale between the character area and the Proposed Development would be reduced in comparison to the existing baseline.</p>				
<p>LTCA 2: Bromley High Street South (covers the Site)</p>	<p>Value</p> <p>This part of the townscape is not designated, the scenic qualities are limited by the retail land uses and associated architectural styles, , such that value is assessed as low.</p> <p>Susceptibility</p> <p>As a developed area and one which contains a range of building heights, where buildings are dominant the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the low value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would be located in this character area, which extends from the junction of Elmfield Road to Bromley South railway station. The Proposed Development would result in very localised physical change within the LTCA via the removal of existing buildings; however the existing street pattern would be retained, with the perception of increased residential land use.</p> <p>The Proposed Development would be taller than the Crest Building, but in close enough proximity to form a consolidated and grouped massing of taller buildings within the character area. The Proposed Development would be set back from the High Street, such that the pattern of lower height buildings and retail land uses adjacent to the High Street which then transition to taller buildings beyond the High street would remain.</p> <p>The Proposed Development would improve the architectural and public realm of the character area. The perception of the Proposed Development would primarily be at close proximity due to the density of the intervening land uses.</p> <p>The lower part of Block A would be delineated by a stepped alignment in the façade, increasing in height east to west. Due to the this, at the eastern part of the building the lower part of Block A would reflect the first storey height of the TX Maxx building. At the western part of the building, the height of the ground floor would reflect that of five storeys of the adjacent property.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Proposed Development would retain the physical changes at the Site level, as per the existing baseline and represent part of redeveloped area within the character area, centred on Ethelbert and Ringers Road, to demarcate the transition between the vehicular and pedestrianised parts of the High Street, but perceived in the context of a taller townscape context, such that the change and effect would be reduced in comparison to the baseline assessment.</p>	Moderate	Minor Beneficial	Low	Negligible Beneficial
<p>LTCA 3: Bromley High Street North</p>	<p>Value</p> <p>The area is covered by a Conservation Area and contains several buildings of merit. The pedestrian aspect of the High Street enables a strong sense of place such that the value is assessed as high.</p> <p>Susceptibility</p> <p>As an area of large scale buildings, where there is already inter-visibility with tall buildings, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the high value and low susceptibility is assessed as medium sensitivity.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located in this character area. The perception of the Proposed Development would be limited due to the alignment of the street pattern and density of the buildings adjacent to the road networks. There would be no change to the character of the area as a result.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter the perception of the Proposed Development would be reduced, becoming part of new land uses and taller buildings within the town centre. As a result, there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
<p>LTCA 4: Church House Gardens and Martins Hill</p>	<p>Value</p> <p>As an area with a high recreational value and scenic quality, and is covered by two conservation areas, the value is assessed as high.</p> <p>Susceptibility</p> <p>The vegetated and open character of the LTCA is such that the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located in this character area and there would be no change to the vegetated character of recreational land use. The Proposed Development would be perceived as part of varied skyline and one of a number of tall buildings, extending between the Churchill Theatre and St. Marks Tower. Due to this the perception of the Proposed Development would not alter the character of the area, which is defined as an open space in an urban centre.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter there would be a substantial alteration to the skyline, such that the perception of the Proposed Development would be reduced and there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
LTCA 5: The Glades	<p>Value</p> <p>The condition of the area is high, due to the management, but the overall scenic quality is low, such that the value is assessed as low.</p> <p>Susceptibility</p> <p>As an area of extensive hardstanding and buildings which has already altered the underlying pattern of the townscape is assessed as having a low susceptibility.</p> <p>Sensitivity</p> <p>The combination of the low value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>As an indoor shopping centre, there would be no change to its character from the Proposed Development.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that for the existing baseline.</p>	Neutral	No Change	Neutral	No Change
LTCA 6: Queen's Gardens	<p>Value</p> <p>As a planted area with a recreational use, the value is assessed as high.</p> <p>Susceptibility</p> <p>The susceptibility is also assessed as high, due to the essential planted character of the area.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility, results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Due to the density of the intervening land uses and their existing influence on this public space any perception of the Proposed Development would not alter its character.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that for the existing baseline.</p>	Neutral	No Change	Neutral	No Change
LTCA 7: Civic Centre	<p>Value</p> <p>The value is assessed as medium.</p> <p>Susceptibility</p> <p>As an area of large scale massing, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change to the Civic Centre. The Proposed Development would be perceived in the context of the High Street and part of the larger scale massing between the character and the Site, which includes taller buildings on Elmfield Road, the Mall Tower and the Glades which form the immediate setting to the character area. Due to this, there would be no change to the character of the area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the future baseline introducing taller buildings to the west of the High Street, the perception of the Proposed Development would reduce and as per the existing baseline, there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
LTCA 8: Elmfield Commercial	<p>Value</p> <p>The scenic quality is low due to the building styles and the poor interface with the public realm. The value is assessed as low.</p> <p>Susceptibility</p> <p>As an area of tall buildings, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the low value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change to Elmfield Commercial. Due to this, there would be no change to the character of the area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the future baseline introducing taller buildings to the west of the High Street, the perception of the Proposed Development would reduce and as per the existing baseline, there would be no change to the character of the area.</p>	Neutral	No Change	Neutral	No Change
LTCA 9: St. Marks and Perigon Heights	<p>Value</p> <p>There are locally listed buildings, a varied scenic quality and therefore the value is assessed as medium.</p> <p>Susceptibility</p> <p>As the LTCA consists of several tall buildings the susceptibility is low.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The height of the Proposed Development and transition in scale from surrounding residential areas would reflect the character of this area. The scale and form of the Proposed Development, and its articulated façade would also reflect the taller buildings in this character area. The Proposed Development would therefore not alter the townscape character of LTCA 9.</p> <p>Operation Year 1 (winter) Future Baseline</p>	Neutral	No Change	Neutral	No Change

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>The future baseline would substantially alter the townscape pattern to the north of the character area via taller buildings. The perception of the Proposed Development would therefore be within this context and there would be no change to the character of LTCA 9, which is already defined by tall buildings.</p>				
LTCA 10: Bromley East Residential	<p>Value</p> <p>As a residential area the value is low.</p> <p>Susceptibility</p> <p>Due to the coherent pattern of buildings, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the low value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The pattern of the character area would not be altered as the Proposed Development would not be located in the character area. The Proposed Development would be perceived due to the height of the Block A, however this would be in the context of being one of a number of taller buildings that demarcate Bromley Town Centre. Therefore there would no change to the character of the townscape character area and the existing influence of taller buildings across Bromley town centre.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>There would be no change to the character of the area as the Proposed Development would be situated adjacent to the Churchill Quarter and would form one of a number of taller buildings across the town centre.</p>	Neutral	No Change	Neutral	No Change
LTCA 11: Bromley South Residential	<p>Value</p> <p>As a residential area the value is low.</p> <p>Susceptibility</p> <p>Due to the coherent pattern of buildings, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the low value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The pattern of the character area would not be altered as the Proposed Development would not be located in the character area. The Proposed Development would be perceived due to the height of the Block A, however this would be in the context of being one of a number of taller buildings that demarcate Bromley Town Centre, including St. Marks Tower. Therefore there would no change to the character of the townscape character area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>There would be no change to the character of the area as the Proposed Development would be situated adjacent to the Churchill Quarter and would form one of a number of taller buildings across the town centre.</p>	Neutral	No Change	Neutral	No Change
LTCA 12: Bromley West Residential	<p>Value</p> <p>As a residential area the value which also includes in part a conservation area, the value is medium.</p> <p>Susceptibility</p> <p>Due to the coherent pattern of buildings, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the medium value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The pattern of the character area would not be altered as the Proposed Development would not be located in the character area. The Proposed Development would be perceived due to the height of the Block A, however this would be in the context of being one of a number of taller buildings that demarcate Bromley Town Centre. Therefore there would no change to the character of the townscape character area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>There would be no change to the character of the area as the Proposed Development would be situated adjacent to the Churchill Quarter and would form one of a number of taller buildings across the town centre.</p>	Neutral	No Change	Neutral	No Change
LTCA 13: Bromley North	<p>Value</p> <p>As a residential area the value is low.</p> <p>Susceptibility</p> <p>Due to the coherent pattern of buildings, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the low value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The pattern of the character area would not be altered as the Proposed Development would not be located in the character area. The Proposed Development would be perceived due to the height of the Block A, however this would be in the context of being one of a number of taller buildings that demarcate Bromley Town Centre. Therefore there would no change to the character of the townscape character area.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>There would be no change to the character of the area as the Proposed Development would be situated adjacent to the Churchill Quarter and would form one of a number of taller buildings across the town centre.</p>	Neutral	No Change	Neutral	No Change
LTCA 14: Bromley South rail corridor	<p>Value</p> <p>As a rail corridor the value is low.</p> <p>Susceptibility</p> <p>Due to the extent of infrastructure the susceptibility is low.</p> <p>Sensitivity</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Due to the infrastructure character of the area and that it is bordered by residential land uses and buildings of varying scales and heights, which already demarcate a perception of arrival at Bromley, there would be no change to the character area.</p> <p>Operation Year 1 (winter) Future Baseline</p>	Neutral	No Change	Neutral	No Change

Landscape Receptor	Sensitivity	Assessment Narrative	Year 1 change / magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 change / magnitude (winter)	Future Baseline Year 15 Effect (winter)
	The combination of the low value and low susceptibility results in a low sensitivity to the Proposed Development.	The setting to the rail corridor would be bordered by a substantially different skyline due to the Churchill Quarter and the Proposed Development would form a consolidated part of this, such that it would not alter the character of the area.				
Site Area						
The Site	<p>Value</p> <p>As an area of low scenic quality, weak public realm and with no cultural or recreational value, the value is assessed as low.</p> <p>Susceptibility</p> <p>As an existing area of buildings and one which is identified for redevelopment via the Bromley Town Centre Area Action Plan, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the low value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would replace three existing buildings and introduce new residential land uses. Block A and Block B would be taller than the existing buildings on Site and of a higher architectural quality.</p> <p>The Block A would extend to ground plus 13 storeys in height, up to 103.32m AOD. The lower part of Block A would be delineated by a stepped alignment in the façade, increasing in height east to west. Due to this, at the eastern part of the building the lower part of Block A would reflect the first storey height of the TX Maxx building. At the western part of the building, the height of the ground floor would reflect that of five storeys of the adjacent property. The middle part of Block A would consist of a staggered alignment of windows with an alternating pattern of balconies, culminating in a stepped roof profile, rising from east to west.</p> <p>Block B would extend to ground plus storeys in height, up to 97.33m AOD. The façade would consist of a stepped arrangement of materials, unified by a symmetrical pattern of windows across the lower and middle parts of the façade, which in turn would have an alternating arrangement of balconies.</p> <p>The lower part of Block B would be delineated by a staggered pattern of several materials across the façade. The upper part of Block B would consist of a stepped arrangement to the building massing to enable a rood terrace at the western part of the building at 89.93m AOD. The perceived massing of the two upper storeys would be reduced by the extent of windows, which in combination with step would result in a clear demarcation of the upper part of the building.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that at year 1 due to the change at the Site specific level.</p>	High	Moderate Beneficial	High	Moderate Beneficial

19.0 APPENDIX 7: LIKELY VISUAL EFFECTS

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
1. Residents on Ravensbourne Road / Ringers Road	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A would be visible, extending above the buildings on the north side of Ringers Road and with the upper 3 storeys above the Crest Building on the south side of Ringers Road. The west façade of the building would consist of a vertical alignment of windows to provide a symmetrical arrangement to the façade, reflecting that across the Crest Building within the composition of the view. The stepped arrangement of Block A would provide visual interest to the top of the building and to the skyline, in contrast to the predominantly flat roof profiles of the existing buildings. The upper two storeys of Block B would also be visible, being set back from the alignment of Block A via the step in the building form. The extent of windows across the upper parts of Block B would reduce the perceived massing of the building in the view. The height of Block B would mirror that of the Crest Building, such that the combination of Block A, Block B and the Crest Building would form a cluster of buildings within the composition of the view, with Block A being the pinnacle building within the arrangement. The composition of the view already includes tall buildings as focal points, both with the Crest Building and the Mall Tower, with Block A and Block B replicating this pattern, bringing taller buildings in noticeably closer proximity to the receptor. The building materials across Block A would provide visual interest whilst reflecting the brick of existing buildings along Ringers Road. The higher quality of the architectural form is assessed as enhancing the composition of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>Development Zone 2 would be visible in the foreground of the view, extending along Ringers Road to the High Street. The Proposed Development would remain the taller buildings such but the effects would reduce in comparison to those predicted for the existing baseline.</p>	High	Moderate Beneficial	Moderate	Minor Beneficial
2. Residents on Ethelbert Road	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Both Blocks A and B would be visible due to the orientation of the view across Ethelbert Road and the height of Block A extending above properties. The articulation to the façade of Block B would provide a visual rhythm across the lower floor. The step in the building across the upper two storeys and the extent of windows would reduce the perceived massing to the upper parts of Block B within the view. The height of Block A would be a noticeable change to the view in comparison to the scale of existing properties, but not uncharacteristic given views of the upper parts of the Crest Building and St Marks Tower, which is visible along Ravensbourne Road, such that Block A would form a similarly focal point, albeit in closer proximity to the receptor. The higher quality of the architectural form and materials is assessed as enhancing the composition of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter massing, the composition of the view along Ethelbert Road would be substantially different to the existing view, via taller massing extending along the north side of the road. The height of the Block B would reflect the height of the Churchill Quarter massing. Block A would remain the taller building within the composition of the view, but would be seen as a part of the varied skyline, reflecting the rhythm in heights across the Churchill Quarter massing and extending up from the combined massing of the Churchill Quarter and Block B.</p>	High	Moderate Beneficial	Moderate	Minor Beneficial
3. Residents on Ethelbert Close	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A and Block B would be visible at close range, resulting in two buildings of a pronounced difference in scale in comparison to the existing buildings along Ethelbert Road within the composition of the view. The articulation to the façade of Block B, via the differing materials, the stepped arrangement of the upper two storeys and the extent of windows would provide visual interest as well as reduce the overall perception of the massing. The articulation across the lower storey of Block B would be delineated by a staggered pattern of several materials across the façade. This would include vertical brick detailing and louvered panels and planters for visual interest. Block A would extend slightly above Block B reflecting the composition of the view in respect of the upper parts of the Crest Building are already visible.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter the receptor would represent new residents living in the Churchill Quarter or within the future developments' public realm. In the context of the receptor being bordered by taller buildings, the change to the composition of the view would be one which reflects the future context with Block A and Block B seen as part of a co-ordinated arrangement of buildings with a similar high degree of articulation across the building facades via the use of materials and building form.</p>	High	Moderate Beneficial	Moderate	Minor Beneficial
4. Visitors and pedestrians on Elmfield Road / Bromley High Street	<p>Value</p> <p>The location has a cultural association, being at the edge of the Conservation Area and is likely to be experienced by a high number of people due to being</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A and Block would be visible due, with Block A extending above the TX Maxx building and Block B extending above the Salvation Army Church buildings and properties on the High Street. The scale of the Proposed Development would establish a varied skyline, by the heights of the buildings stepping back from those on the High Street, so as to retain the focus of the view on the façade of High Street and the Metro Bank (no 72-82 High Street), whilst providing a greater level</p>	Moderate	Moderate Beneficial	Low	Minor Beneficial

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>on the High Street. The value is therefore assessed medium.</p> <p>Susceptibility</p> <p>As the receptor may be visiting the conservation area, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the medium value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>of visual interest and focal points beyond the junction of Elmfield Road and the High Street, with Block A replacing existing views of St. Marks Tower and resulting in a greater degree of visibility than the existing ridgeline of the Crest Building.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter there would be taller buildings extending above the Metro Building. Block A and Block B would be seen as part of this massing and varied skyline; however, the impact from Block A and Block B would be reduced.</p>				
5. Visitors and pedestrians on Elmfield Road	<p>Value</p> <p>The view is not designated and at this location from the conservation area does not contribute to the cultural association. The value is assessed as medium.</p> <p>Susceptibility</p> <p>As the views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Due to the alignment of Elmfield Road and the foreshortening from the height of the intervening buildings on the south side of the road, Block A would not be visible. The upper part of Block B would be visible providing a variation to the roof profiles along the south side of Elmfield Road. The increased height of Block B in relation to the existing properties would aid in visually demarcating the transition from the High Street and Elmfield Road. Block B would provide a focal point to the channelled composition of the view. Due to the distance and intervening buildings, Block B would not be an unobtrusive change. Block B would be of a higher architectural quality to the composition of the view than the existing buildings via the materials.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The composition of the view would be characterised by taller buildings on both sides of Ethelbert Road, due to the Proposed Development and the Churchill Quarter. This would provide a more varied skyline, with Block B remaining visible and reflecting the beneficial change to the view.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
6. Visitors and pedestrians on Bromley High Street (Refer to VuCity View F)	<p>Value</p> <p>The view is not designated, but is likely to be visited by a high number of people, such that the value is medium.</p> <p>Susceptibility</p> <p>As views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper storeys of Block A would be visible, extending above buildings on the High Street. Block A would be seen beyond and very slightly above the upper parts of the Crest Building. The roof line of Block B would also be visible, but due to the foreshortening, it would form a very small part of the view. Block A would reflect the height of the Churchill Quarter within the composition of the view, forming a focal point to this part of the High Street but one which did not detract visually from the Churchill Quarter. The Proposed Development would also visually provide a higher architectural quality than surrounding buildings. The height of Block A would also form a complementary relationship with the scale of the Crest building to provide a visual interest and a visual unity to the composition of the view, such that the Proposed Development would visually appear as part of a consolidated group of taller buildings behind the high-street.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>Block A would form part of an arrangement of taller buildings extending adjacent to the High Street, from the Churchill Quarter massing. The scale of Block A would reinforce this relationship of taller buildings being set back from the High Street with a substantial change to the composition of the view as a result of the future baseline buildings, such that the visibility of the Proposed Development would reduce.</p>	Moderate	Minor Beneficial	Low	Negligible Beneficial
7. Visitors to Bromley at Bromley Railway Station	<p>Value</p> <p>The view is not designated, but is likely to be visited by a high number of people, such that the value is medium.</p> <p>Susceptibility</p> <p>As views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The very upper parts of Block A would be visible, with Block B not visible due to the combination of distance and intervening buildings (including Block A). The horizontal form to the roof of Block A would reflect the horizontal form of existing buildings along the High Street, including the roof line of no.44 High Street. The overall change to the view would be very small, with the channelled alignment along the High Street remaining the focal point to the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Development Zones adjacent to Bromley South station, Block A would not be visible due to the intervening buildings. The Proposed Development would therefore not result in a change to the view.</p>	Negligible	Negligible Beneficial	Neutral	No Change

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
8. Pedestrians crossing the railway line (refer to VuCity View C)	<p>Value</p> <p>The view is identified in the BTCAAP as one of the key views across the townscape. The value is therefore assessed as high.</p> <p>Susceptibility</p> <p>Due to the location above the railway the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the high value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Both Block A and Block B would be visible, although seen through the mesh fencing across the railway bridge. Block A and Block B would provide visual interest to the view, by reflecting the rhythm of building heights which exists between St. Marks Tower, the Crest Building and the Churchill Theatre. All these existing building would remain visible and the Proposed Development would not compete with the views of the Churchill Theatre, due to its lower position within the townscape and intervening distance. The height of Block A and B would extend above the Crest Building. The stepped arrangement to the upper storeys of Block A and Block B would reduce the perceived massing of these parts of the building and provide visual interest to the skyline. Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from the Crest Building to Block B such that visually they would form a consolidated cluster of buildings within the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The implementation of the Development Zones, including the Churchill Quarter massing would substantially change the skyline with taller buildings extending across the townscape. The Proposed Development would form part of this arrangement and varied skyline.</p>	Moderate	Moderate Beneficial	Low	Minor Beneficial
9. Residents on Ridley Road	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A and Block B would be visible, extending above the intervening two storey residential properties. The height of Block A would extend above the Crest Building, but Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from the Crest Building and then back down to Block B. The Proposed Development would be seen as part of group of buildings and provide visual interest to the skyline, replacing views of the upper parts of the Mall Tower with buildings of higher architectural quality.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would also extend above the skyline, introducing a varied arrangement of taller buildings. The Proposed Development would therefore form part of this skyline, being situated between the Churchill Quarter and St. Mark's Tower. The height of Block A would reflect the height of building in the Churchill Quarter and reinforce the visual link with the Crest Building.</p>	Moderate	Minor Beneficial	Low	Minor Beneficial
10. Recreational users in Church House Gardens (refer to VuCity View B)	<p>Value</p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Both Blocks A and B would be visible due to the orientation of the view across the gardens although views of Block B would be softened by the density of the intervening vegetation in winter. The height of Block A would be a noticeable change to the view in comparison to the height of the Crest Building, but not uncharacteristic given the composition of the view is demarcated by contemporary buildings extending above lower height residential properties via the Crest Building and St. Marks Tower. As the composition of the view is therefore already defined by taller buildings bordering the gardens and the perception of the Town Centre, the Proposed Development would not be a complete change to the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>With the implementation of the Churchill Quarter massing, the Proposed Development would be seen as one of a number of taller buildings beyond the gardens. The height and form of the Proposed Development would reflect that of the Churchill Quarter and form a visual link between the Churchill Quarter and Crest Building.</p>	Moderate	Moderate Beneficial	Low	Minor Beneficial
11. Visitors to the Churchill Theatre	<p>Value</p> <p>The location is part of the local importance to the setting of theatre and the value is assessed as medium.</p> <p>Susceptibility</p> <p>As the receptor is likely to be a visitor to a cultural landmark, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be visible due to the distance between the receptor and the Site and the proximity of intervening vegetation and boundary walls.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that of the existing baseline.</p>	Neutral	No Change	Neutral	No Change

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	The combination of the medium value and the moderate susceptibility results in a medium sensitivity .					
12. Visitors and pedestrians on Bromley High Street	<p>Value</p> <p>As the location is likely to be experienced by a high number of people but is not designated nor do views form part of the experience, the value is medium.</p> <p>Susceptibility</p> <p>As the views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A would be visible extending above the intervening buildings on the High Street and above the Crest Building, which would remain visible. Block A would therefore establish a stepped arrangement of massing, increasing in height from the TK Maxx building, across the Crest Building to Block A. This arrangement of buildings would provide visual interest to the view. The upper parts of Block B would also be visible, mirroring the scale of the Crest Building and the detailing via the extent of upper storey windows. The Proposed Development would therefore reinforce the existing composition of the view which is demarcated by lower height buildings along the High Street with taller building in the background of the view, with Block A becoming the focal point of the view, with the proposed brick materials reflecting brick buildings in the foreground of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would reduce the visibility of Block B, with Block A being seen as coordinated part of the massing extending from beyond the Churchill Theatre. Block A would retain the visual interest and focal point to the channelled composition of the view along the High Street, but would be less of a change to the overall composition of the view.</p>	Moderate	Minor Beneficial	Low	Minor Beneficial
13. Visitors and pedestrians at Market Street	<p>Value</p> <p>The view is not designated but this location is from the conservation area as is likely to be visited by a high number of people. The value is assessed as medium.</p> <p>Susceptibility</p> <p>As the receptor may be visiting the conservation area, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the medium value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper parts of Block A would be visible extending above the intervening buildings on the High Street and seen extending above the Crest Building, which would remain visible, but at the same height as St. Marks Tower. Block A would therefore establish a stepped arrangement of massing, and form part of a group of buildings, along with the Crest Building and St. Marks Tower. Block B would not be visible due to the alignment of the view and intervening building. Block A would reflect the brick materiality of buildings along the High Street and form part of the taller massing beyond the High Street.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>Block A would remain visible due to the orientation of the view truncating views of the Churchill Quarter. Block A would reinforce the composition and the steeped arrangement between St. Marks Tower, the Crest Building and Block A.</p>	Low	Minor Beneficial	Low	Minor Beneficial
14. Visitors and pedestrians at Church Road	<p>Value</p> <p>The view is not designated but this location is of the Church and as is likely to be visited by a high number of people. The value is assessed as medium.</p> <p>Susceptibility</p> <p>As the receptor may be visiting the Church, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the medium value and moderate susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Neither Block A, nor Block B, would be visible due to the distance between the receptor and the Site, the density of the intervening vegetation and the fall in the underlying landform.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that at of the existing baseline.</p>	Neutral	No Change	Neutral	No Change
15. Visitors and recreational users at Church House gardens	<p>Value</p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p>Susceptibility</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper parts of Block A and Block B would be visible although largely softened by the intervening vegetation within the gardens. The upper part of Block A would be seen on the context of the Crest Building, although not visually prominent due to the filtering by the intervening vegetation. Whilst Block A would be taller than the Crest Building, due to its height, it would not alter the visual relationship between the gardens and the town centre, which is already defined by views of the Churchill Theatre and the Crest Building. Views of Block A would reflect the horizontal form of the Churchill Quarter.</p>	Negligible	Negligible Beneficial	Neutral	No Change

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Future Baseline</p> <p>With the implantation of the Churchill Quarter, the Proposed Development would be screened. Therefore, there would be no change to the view in relation to the Proposed Development.</p>				
<p>16. Recreational users at Martins Hill (Bromley War Memorial)</p> <p>(ref to VuCity View A)</p>	<p>Value</p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Only the upper part of Block A would be visible as the density of the intervening vegetation would screen the remainder of the Proposed Development. The horizontal form of the roof profile to Block A would reflect the horizontal form of the Churchill Theatre which is also visible within the view, although both are softened by intervening vegetation. The overall composition of a vegetated skyline would remain.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would screen views of most of Block A and Block B, such that in relation to the Proposed Development only, it would not alter the composition of the view..</p>	Negligible	Negligible Beneficial	Neutral	No Change
<p>17. Recreational users at Martins Hill recreation ground (Queensmead)</p> <p>(refer VuCity View E)</p>	<p>Value</p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park and part of a Conservation Area the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The stepped arrangement to the upper storeys of Block B would be visible, being seen at the same height and scale as the Crest Building within the view. Block A would also be visible, extending above the intervening vegetation and slightly above the Crest building. The arrangement of Block A and Block B would form a cluster of buildings with the Crest Building. Block A and Block B would form part of the varied skyline which consists of taller buildings above the tree line, extending from the Churchill Theatre, the Mall Tower, the Crest Building, Perigon Heights and the St. Marks Tower. The Churchill Theatre would remain the more notable building within the view, due to its position on the ridge line and that the Proposed Development would be set lower in the townscape and is lower in height.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The visibility of part of Block B would be reduced by the Churchill Quarter massing, whilst Block A would remain visible. The introduction of the Churchill Quarter would alter the skyline, such that views of Block A and Block would be seen in this context, representing a smaller change to the composition of the view in comparison to the assessment of the Proposed Development only.</p>	Low	Minor Beneficial	Negligible	Negligible Beneficial
<p>18. Visitors and pedestrians adjacent to Bromley College</p>	<p>Value</p> <p>The view is not designated but this location includes the College and as is likely to be visited by a high number of people. The value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor may be visiting the College, the susceptibility is assessed as moderate.</p> <p>Sensitivity</p> <p>The combination of the high value and moderate susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Due to the distance from the Site, the alignment of the view and the intervening buildings and the underlying fall in the landform across Bromley, the Proposed Development would not be visible.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that at year 1.</p>	Neutral	No Change	Neutral	No Change
<p>19. Motorists on the A21 on the</p>	<p>Value</p>	<p>Operation Year 1 (winter) Existing Baseline</p>	Neutral	No Change	Neutral	No Change

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
northern approach to Bromley	<p>As this location is not designated, but is a local transport route with a high number of people, the value is medium.</p> <p>Susceptibility</p> <p>As the receptor is a main road user, the susceptibility is low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Due to the distance and intervening buildings, the Proposed Development would not be visible.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would screen the Proposed Development due to being positioned between the receptor and the Site.</p>				
20. Pedestrians on Beckenham Lane	<p>Value</p> <p>As the location is likely to be in regular use the value is assessed as medium.</p> <p>Susceptibility</p> <p>As views are incidental to the activity, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The combination of distance and the height of the railway line would screen the Proposed Development.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The skyline would be changed by the additional massing of the Churchill Quarter and Block A and Block B would not be visible, such that they would not change the composition of the view.</p>	Neutral	No Change	Neutral	No Change
21. Pedestrians on Farnaby Road	<p>Value</p> <p>As the location is likely to be in regular use and views across the Shortlands Village Conservation Area are heavily screened by the roadside vegetation, the value is assessed as medium.</p> <p>Susceptibility</p> <p>As views are incidental to the activity, the susceptibility is assessed as low.</p> <p>Sensitivity</p> <p>The combination of the medium value and low susceptibility results in a low sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The combination of distance and intervening vegetation would result in the Proposed Development being screened.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>As per the existing baseline assessment, the intervening vegetation and distance would screen the Proposed Development.</p>	Neutral	No Change	Neutral	No Change
22. Recreational users at Plaistow Lane	<p>Value</p> <p>As the location is likely to be experienced by a high number of people, the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation where the surrounding are incidental, the susceptibility is low.</p> <p>Sensitivity</p> <p>The combination of the high value and low susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be visible due to the intervening buildings, vegetation and distance.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>There would be additional massing across the skyline, however it would be barely perceptible due to the proximity of the intervening vegetation. The orientation of the view would remain visible and the assessment would reflect that in relation to the existing baseline.</p>	Neutral	No Change	Neutral	No Change
23. Residents on Bishops Avenue	<p>Value</p>	<p>Operation Year 1 (winter) Existing Baseline</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>The upper parts of Block A would be visible in the background of the view, being adjacent to the upper parts of the Crest Building and seen beyond tall buildings adjacent to Elmfield Road. The Proposed Development would introduce a higher architectural quality than the existing buildings within the view and reflect the visual delineation of the town centre and provide more visual interest to the view via a more varied skyline.</p> <p>Operation Year 1 (winter) Future Baseline There would be additional height to the buildings in the background of the view, however the alignment of the view would retain views of the Proposed Development as per the existing baseline assessment.</p>				
24. Residents at The Chase	<p>Value The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The upper parts of Block A would be visible in the background of the view, whilst Block B would be screened by the intervening buildings. Block A would be seen in the context of the Mall Tower, the upper parts of St Marks Tower and the Bank of America buildings adjacent to Elmfield Road; however Block A would be lower in height within the composition of the view than these buildings. The stepped horizontal form of Block A would reflect and the form of the buildings adjacent to Elmfield Road. The Proposed Development would increase the number of tall buildings in the background of the view, but reflect the existing composition which already demarcates the town centre and the change in scale between two storey residential properties and taller buildings.</p> <p>Operation Year 1 (winter) Future Baseline Due to the alignment of the view, the future baseline schemes would not be visible and the assessment would reflect that of the existing baseline.</p>	Low	Minor Beneficial	Low	Minor Beneficial
25. Residents at Murray Avenue	<p>Value The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The upper parts of Block A would be visible in the background of the view, being adjacent to the upper parts of the Crest Building and seen beyond tall buildings adjacent to Elmfield Road (Bank of America). The Proposed Development would reflect the visual delineation of the town centre and be seen as part of a cluster of buildings within the composition of the view.</p> <p>Operation Year 1 (winter) Future Baseline There would be additional height to the buildings in the background of the view via the Churchill Quarter, however the alignment of the view would retain views of the Proposed Development as per the existing baseline assessment.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
26. Motorists on the A21 at the southern approach to Bromley	<p>Value As this location is not designated, but is a local transport route with a high number of people, the value is medium.</p> <p>Susceptibility As the receptor is a main road user, the susceptibility is low.</p> <p>Sensitivity The combination of the medium value and low susceptibility results in a low</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be visible due to the height of Perigon Heights, the intervening buildings and distance from the Site.</p> <p>Operation Year 1 (winter) Future Baseline The assessment would reflect that for the existing baseline.</p>	Neutral	No Change	Neutral	No Change

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	sensitivity to the Proposed Development.					
27. Residents on Cameron Road	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>As small part of the upper storey of Block A would be visible above the angled roof line of St Marks Tower, along with a small part of Block B. The angled alignment and form of St. Marks Tower would remain the notable feature of the view, such that the Proposed Development would not be prominent, and form a barely discernible change to the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would be visible in the background of the view, introducing additional massing and a more varied skyline, such that the upper parts of Block A would be integrated into this new skyline, but remain a very small change to the view.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
28. Residents on Cumberland and Durham Avenue	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A and Block B would be visible, although largely softened by the density of the intervening vegetation. Both Block A and Block B would be seen adjacent to the Crest Building, forming a consolidated arrangement of massing, with Block B mirroring the height of the Crest Building and Block A forming the pinnacle of the massing arrangement. Whilst additional massing within the view, it would not alter the composition of the view, which consists of taller buildings in the background of the view demarcating the town centre.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The Churchill Quarter massing would be visible through the intervening vegetation, however due to the alignment of the view the impact of the Proposed Development would remain as per the existing baseline assessment.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
29. Residents on Cumberland Avenue (refer to VuCity View D)	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p> <p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>Block A and Block B would be visible in the background of the view, being seen adjacent to the Crest Building and the Mall Tower beyond. The height of Block B would mirror that of the Crest Building, with the combination of the massing forming a consolidated arrangement of buildings, with Block A the taller element at a similar height to that of the Mall Tower. The Proposed Development would integrate with the existing skyline, via stepping up in height across Block B and Block A, mirroring the step in scale across the Crest Building along Ringers Road, with Block A and the Mall Tower as the taller buildings in the centre of this composition.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The implementation of the Development Zones would alter the skyline in the background of the view, with taller massing extending across the channelled composition of the view. The height of Block A and B would mirror that of the Churchill Quarter, visually linking the composition of buildings between the Churchill Quarter and the Crest Building.</p>	Low	Minor Beneficial	Negligible	Minor Beneficial
30. Residents on Kingswood Road	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p>Susceptibility</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper part of Block A would be visible from the more elevated parts of the road and would be seen as one of several taller buildings extending above the skyline, situated between the Churchill Theatre and St. Marks Tower. The height of Block B would reflect that of the Crest Building, which along with Block A would form a consolidated group of taller buildings within the composition of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p>	Low	Minor Beneficial	Negligible	Negligible Beneficial

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity</p> <p>The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>The Churchill Quarter would introduce taller building massing across the skyline and in a more elevated part of the townscape in comparison to the Proposed Development. Due this, the Churchill Quarter massing would be taller than the Proposed Development and the skyline, with the Proposed Development forming an integrated part of the skyline.</p>				
31. Recreational users at Southlands Park	<p>Value</p> <p>As the location is likely to be experienced by a high number of people the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper part of Block A would be visible in the background of the view, extending very slightly above the intervening residential properties and vegetation. Due to the distance and the extent of buildings within the view, the change to the composition of the view would be barely perceptible.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The upper parts of the Churchill Quarter massing would be visible, but as per the existing baseline assessment, both this and the Proposed Development would not fundamentally change the composition of the view.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
32. Recreational users at Norman Park	<p>Value</p> <p>As the location is likely to be experienced by a high number of people and there are vistas across to Bromley, the value is assessed as high.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper storeys of Block A would be visible, seen extending directly above the Crest Building. Block B would not be visible, due to being screened by Block A. Block A would form part of the background of the view and varied range of building heights and styles, which include Perigon Heights. The Proposed Development would increase the amount of development to the west of the High Street in the composition of the view, which is concentrated to the east of the High Street and be seen as part of group of taller buildings in the background of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The upper parts of the Churchill Quarter massing would be visible, with Block A being seen directly in this context and consolidated within this massing, such that the change to the view would be very small.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial
33. Recreational users at Langley Park	<p>Value</p> <p>The location is part of the public rights of way route and the value is assessed as medium.</p> <p>Susceptibility</p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity</p> <p>The combination of the medium value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The Proposed Development would not be visible due to the intervening buildings, vegetation, distance and undulating landform.</p> <p>Operation Year 1 (winter) Future Baseline</p> <p>The assessment would reflect that for the existing baseline.</p>	Neutral	No Change	Neutral	No Change
34. Residents on Chesham Avenue	<p>Value</p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number</p>	<p>Operation Year 1 (winter) Existing Baseline</p> <p>The upper part of Block A would be visible, but at distance such that it would form a very small part of the view.</p> <p>Operation Year 1 (winter) Future Baseline</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial

Visual Receptor (VR)	Sensitivity	Assessment Narrative	Year 1 Magnitude (winter)	Year 1 Effect (winter)	Future Baseline Year 1 Magnitude (winter)	Future Baseline Year 15 Effect (winter)
	<p>of people and the value is assessed as low.</p> <p>Susceptibility As the receptor is a resident the susceptibility is high.</p> <p>Sensitivity The combination of the low value and high susceptibility results in a medium sensitivity to the Proposed Development.</p>	The upper parts of the Churchill Quarter massing would be visible, but as per the existing baseline assessment, both this and the Proposed Development would not fundamentally change the composition of the view.				
35. Recreational users at Keston Common	<p>Value As the location is likely to be experienced by a high number of people, the value is assessed as high.</p> <p>Susceptibility As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline The Proposed Development would not be visible due to the density of the intervening vegetation.</p> <p>Operation Year 1 (winter) Future Baseline The Proposed Development would not be visible due to the density of the intervening vegetation.</p>	Neutral	No Change	Neutral	No Change
36. Visitors and recreational users at Crystal Palace Park	<p>Value As the location is likely to be experienced by a high number of people and there are vistas across the park and the view is designated in the Local Plan, the value is assessed as high.</p> <p>Susceptibility As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p>Sensitivity The combination of the high value and high susceptibility results in a high sensitivity to the Proposed Development.</p>	<p>Operation Year 1 (winter) Existing Baseline Block A and Block B would be visible, due to the elevated position of the receptor, whom are located approximately 6.2km from the Site. The Proposed Development would be seen between the Mall Tower and St Marks Tower, with views of the Churchill Theatre remaining. At this distance, the height of Block A and Block B would form a consolidated massing with the Crest Building and the change to the view would be very small.</p> <p>Operation Year 1 (winter) Future Baseline The Development Zones would also be visible, with the Proposed Development forming a co-ordinated part of this massing and reflecting the impact and effect as per the baseline assessment.</p>	Negligible	Negligible Beneficial	Negligible	Negligible Beneficial



RINGER'S ROAD, BROMLEY

RENDERED VUCITY IMAGES

RRB-ETL-XX-XX-RP-L-0705

JULY 2021

REVISION 01

TABLE OF CONTENT

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Figure L06

1.0 METHODOLOGY

Scheme Model.	21.06.02 - Ringers Site Model
Scheme Plan.	18.085 - Ringers Road - Site Plan & Future MasterplanScheme
Scheme Sections.	18.085.220.02 - Proposed Section C-C'
Topographical Survey.	2267 01 Rev A

OVERVIEW

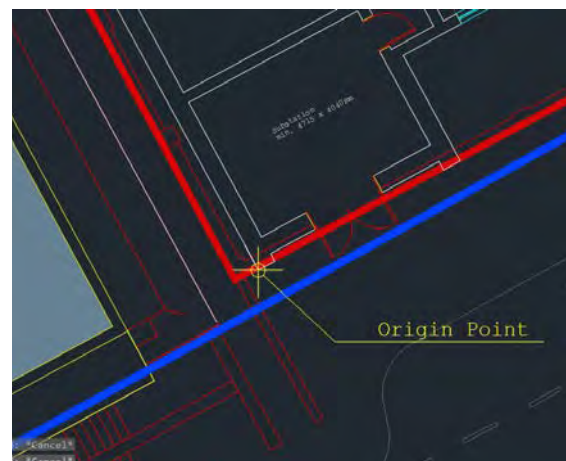
ETLA were appointed by Ringers Road Properties Ltd to undertake rendered VuCity Images in respect of land at Ringers Road. The focus of the VuCity Images is two new residential buildings at the Site consisting of Block A, adjacent to Ringers Road and Block B, adjacent to Ethelbert Road. VU.CITY has created the largest and most accurate interactive 3D digital model of London. Covering the whole of London and Bromley – 1,617 sq km – including every building, road, tree and public space and is accurate to within 15 cm.



Screengrab from VU.CITY London

3D MODELLING

The modelling of Blocks A and B was executed in SketchUp Pro 2020. Model coordinates were based on the drawings provided by the architects along with the surveyor. Block A corner was taken as an **origin point** (see screengrab). Eastings and Northings of the origin point were identified using the topographical survey. The AOD of the origin point was identified using the sections drawing which showed the FFL AOD. The modelling of the cumulative schemes was provided by Holloway Architects and was based on the 'Bromley Town Centre - Site G/10 - Masterplan - July 2018' document.



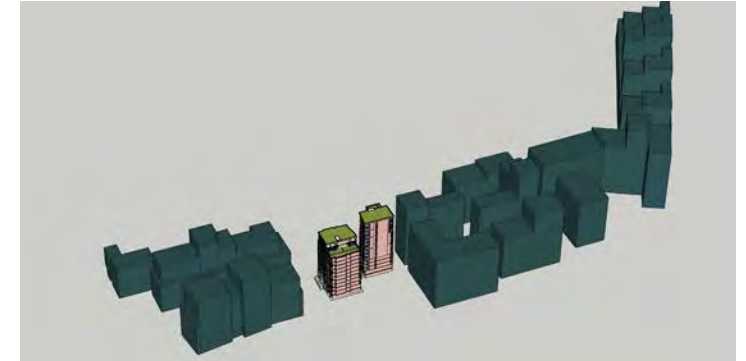
Origin point on corner of Block A

In order to geolocate the model, the origin point at block A was moved to match with SketchUp's Point of Origin (0,0,0). This procedure allows SketchUp models to be imported and placed correctly in VU.CITY and is usually referred to as 'zeroing' a model.

The model was then exported in FBX format to be imported to VU.CITY.



The 3D model as received by Holloway Architects



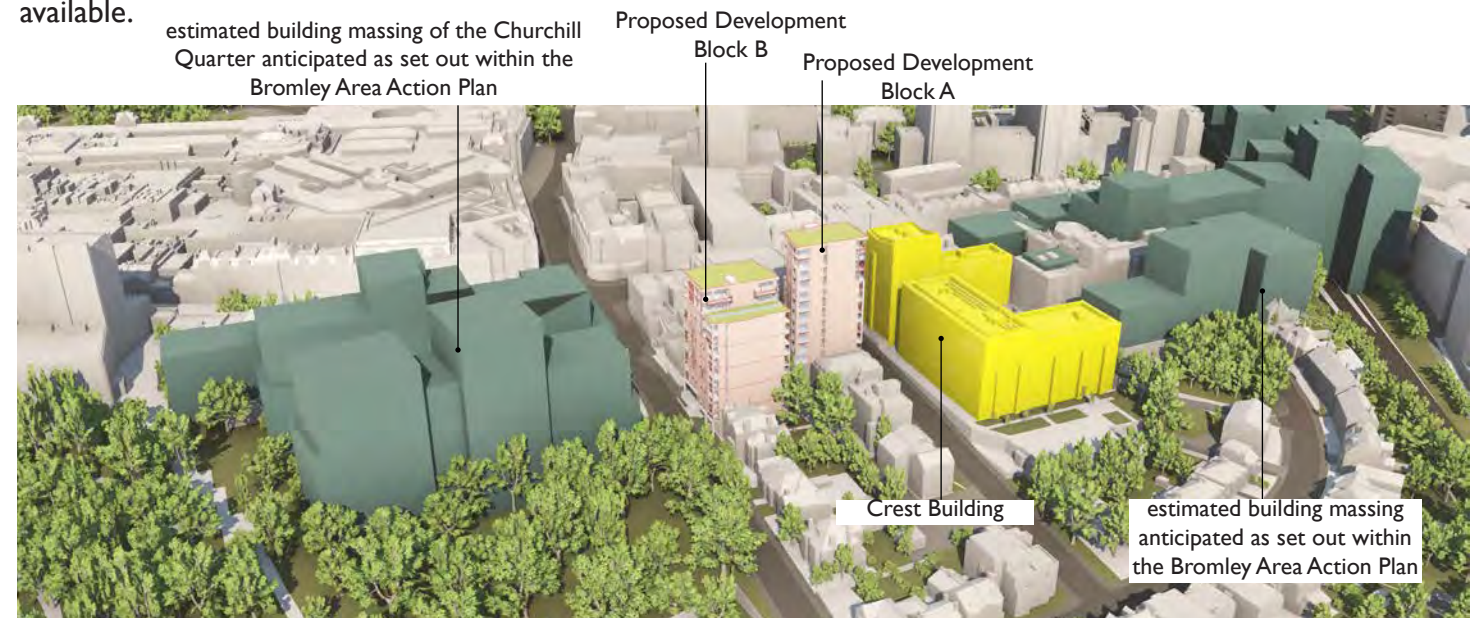
Model setup complete and ready to be exported to VU.CITY

CAMERA SETUP

The model was imported to the VU.CITY environment using the following coordinates for the origin point:

Eastings: **540251.4** Northings: **168884.5** AOD: **57.22**

The camera points were then manually plotted to be as close as possible to the views taken during a site visit. There is inevitably some variation in the views given that Vu.City does not have a camera matching option available.



Imported mass model in VU.CITY

2.0 VIEWPOINT LOCATION PLAN



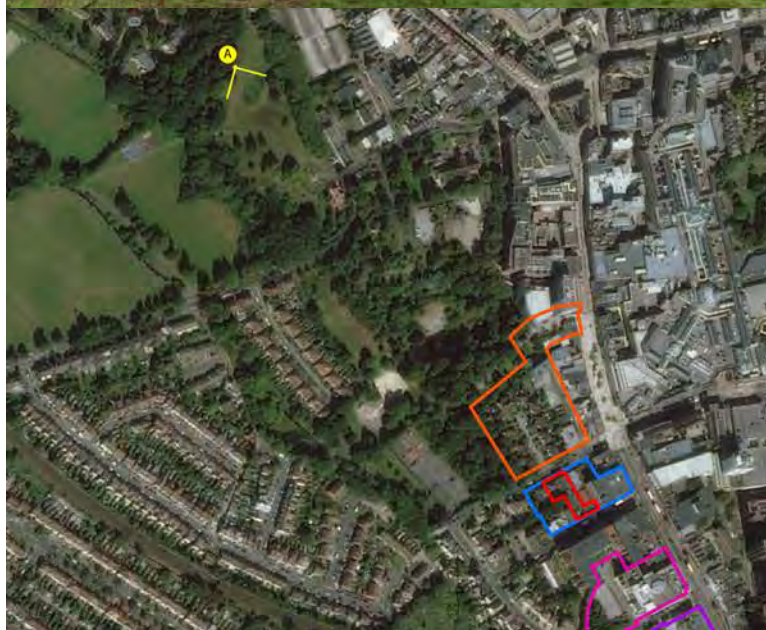
Key

- Site Boundary
- Viewpoint Locations

Bromley Town Centre Area Action Plan Development Zones

- Development Zone 1 (Also referred to as the Churchill Quarter)
- Development Zone 2
- Development Zone 3
- Development Zone 4
- Development Zone 5

Figure L06



Key plan

Original View

View (A)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 12.01.21 | Time 09:43

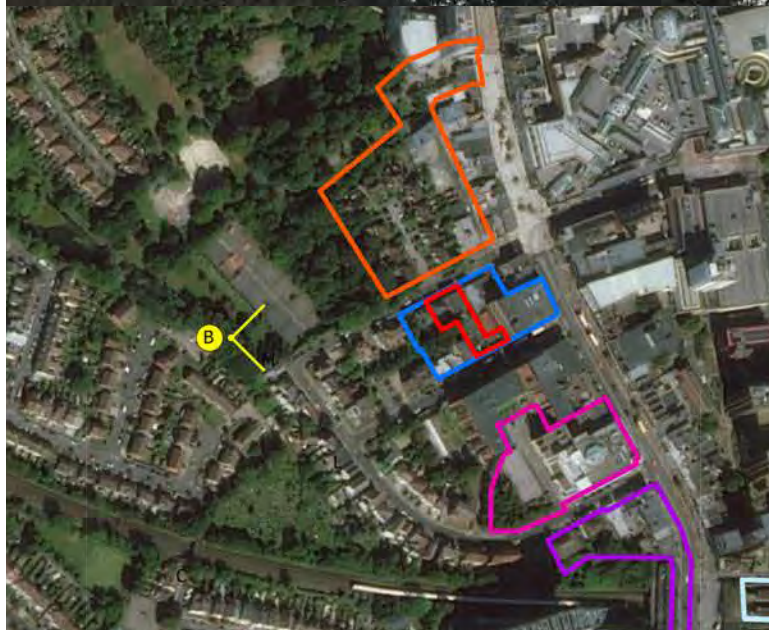
Figure L06



Proposed View - VuCity

View (A)

Figure L06



Original View

View (B)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 12.01.21 | Time 12:21

Key plan

Figure L06



Proposed View - VuCity

View (B)

Figure L06



Key plan

Original View

View (C)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 12.01.21 | Time 12:51

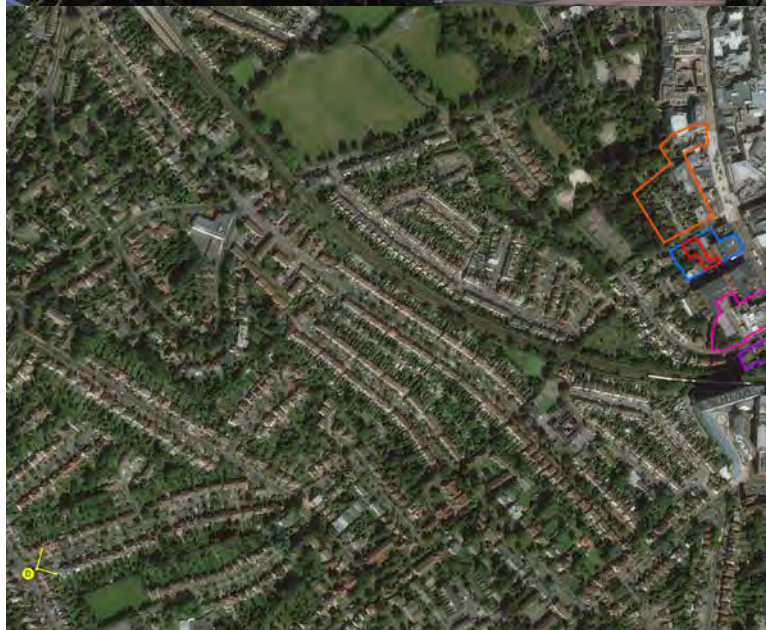
Figure L06



Proposed View - VuCity

View (C)

Figure L06



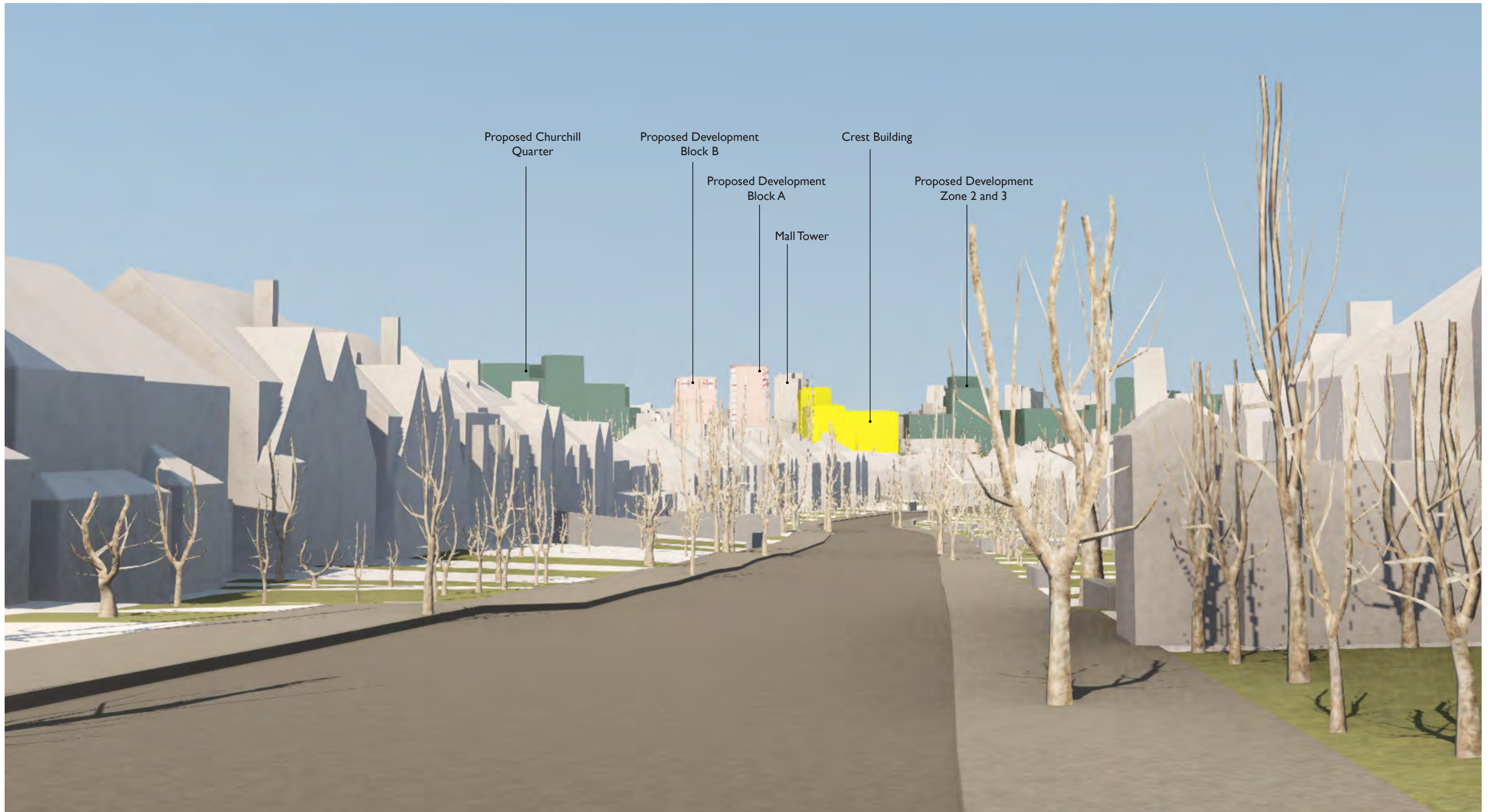
Key plan

Original View

View (D)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 12.01.21 | Time 14:43

Figure L06



Proposed View - VuCity

View (D)

Figure L06



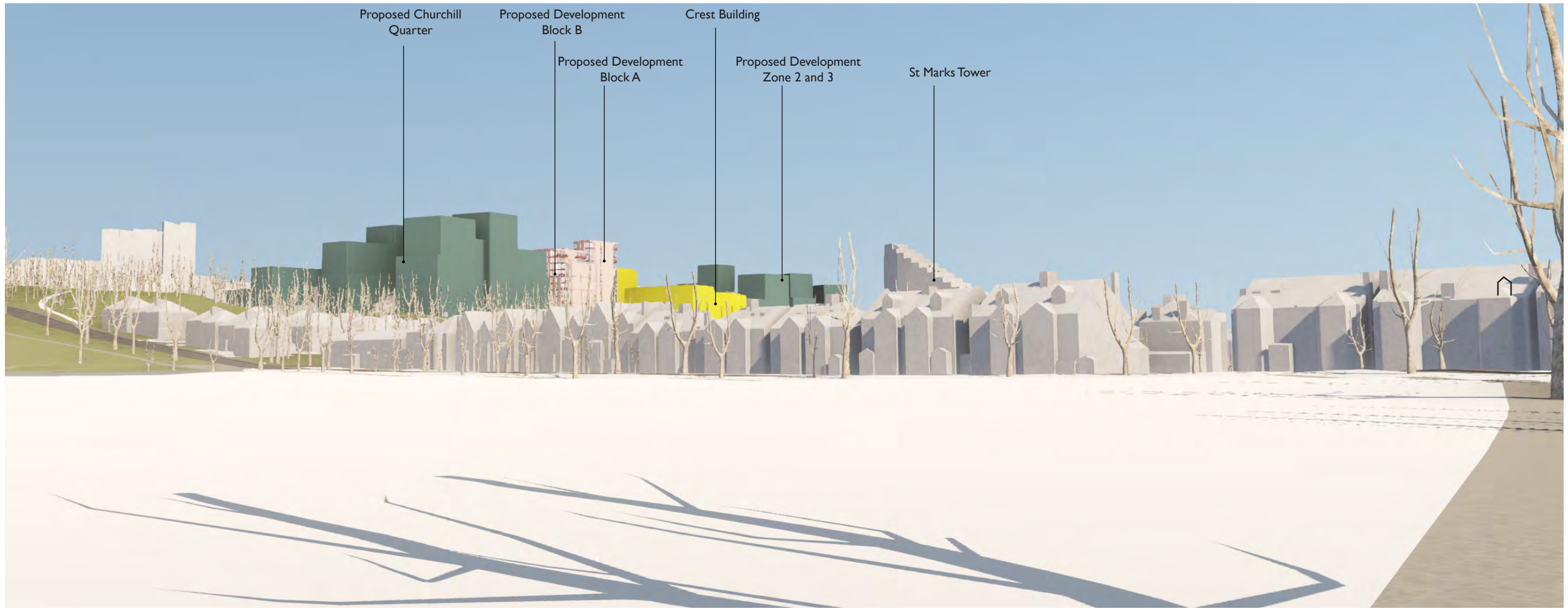
Key plan

Original View

View (E)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 12.01.20

Figure L06



Proposed View - VuCity

View (E)

Figure L06



Key plan

Original View

View (F)

Focal length 50mm | Camera height above survey point 0mm | Nominal lens rise 0mm | Date 05.12.20

Figure L06



Proposed View - VuCity Proposed View excluding cumulative scheme

View (F)

Figure L06



Proposed View - VuCity Proposed View including cumulative schemes

View (F)

Figure L06



VIEWPOINT I
[FOR CONTEXT ONLY]

Description: View from Ravensbourne Road, looking north-east along Ringers Road to Bromley High Street.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 09:26		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 50° from North	Distance from site. 102m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	Sheet Number. 1 of 72
							Rev.

ETLA



Description: View from Ravensbourne Road, looking north-east along Ringers Road to Bromley High Street.

VIEWPOINT 1 - SINGLE FRAME



VIEWPOINT 2
[FOR CONTEXT ONLY]

Description: View from the corner of Ethelbert Road and Ravensbourne Road, looking east.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 05/12/2020 @ 09:58		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 3 of 72
Direction of View (Clockwise). 80° from North	Distance from site. 101m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from the corner of Ethelbert Road and Ravensbourne Road, looking east.

VIEWPOINT 2 - SINGLE FRAME



VIEWPOINT 3

[FOR CONTEXT ONLY]

Description: View from Ethelbert Close, looking south, with the location of Block B in the foreground of the view.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 10:31		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 5 of 72
Direction of View (Clockwise). 150° from North	Distance from site. 29m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Ethelbert Close, looking south, with the location of Block B in the foreground of the view.

VIEWPOINT 3 - SINGLE FRAME



VIEWPOINT 4
[FOR CONTEXT ONLY]

Description: View from the junction of Elmfield Road and the High Street, looking west.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 05/12/2020 @ 10:27		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 7 of 72
Direction of View (Clockwise). 140° from North	Distance from site. 89m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from the junction of Elmfield Road and the High Street, looking west.

VIEWPOINT 4 - SINGLE FRAME



VIEWPOINT 5
[FOR CONTEXT ONLY]

Description: View from Elmfield Road, looking west towards the High Street.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 11:43		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 240° from North		Distance from site. 210m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from Elmfield Road, looking west towards the High Street.

VIEWPOINT 5 - SINGLE FRAME



VIEWPOINT 6
[FOR CONTEXT ONLY]

Description: View from Bromley High Street, looking north-west.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 07/03/2021 @ 14:32		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 11 of 72
Direction of View (Clockwise). 300° from North	Distance from site. 143m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Bromley High Street, looking north-west.

VIEWPOINT 6 - SINGLE FRAME



VIEWPOINT 7

[FOR CONTEXT ONLY]

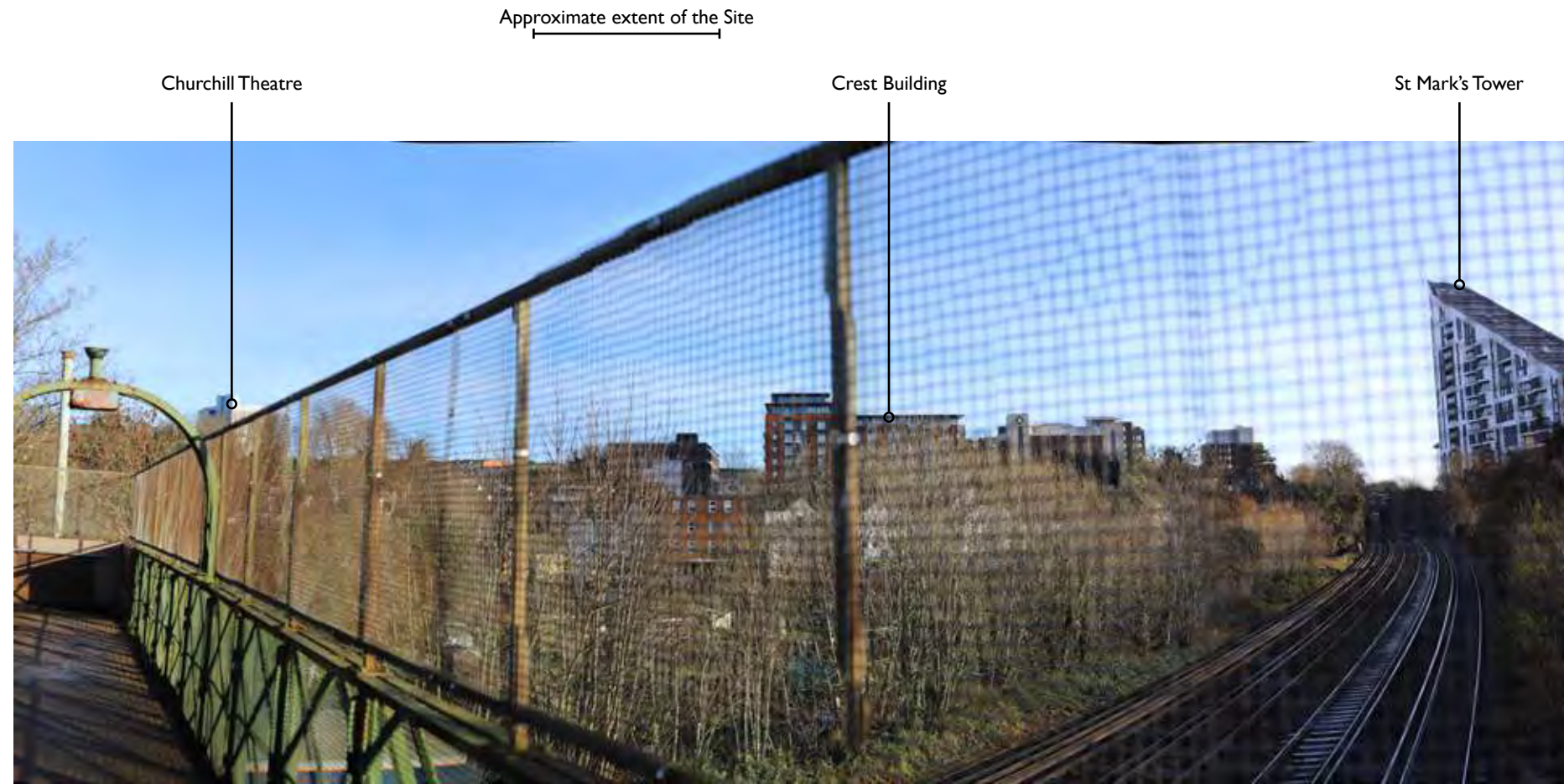
Description: View from Bromley South railway station, at the southern part of the High Street, looking north-west.

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 10:47		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 13 of 72	
Direction of View (Clockwise). 320° from North	Distance from site. 253m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.	



Description: View from Bromley South railway station, at the southern part of the High Street, looking north-west.

VIEWPOINT 7 - SINGLE FRAME



VIEWPOINT 8

[FOR CONTEXT ONLY]

Description: View from the railway bridge crossing, between Ravensbourne Road and Queen Anne Avenue, looking east. The location is one of the identified views in the Bromley Town Centre Area Action Plan.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 11:11		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 50° from North		Distance from site. 238m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from the railway bridge crossing, between Ravensbourne Road and Queen Anne Avenue, looking east. The location is one of the identified views in the Bromley Town Centre Area Action Plan.

VIEWPOINT 8 - SINGLE FRAME



VIEWPOINT 9
[FOR CONTEXT ONLY]

Description: View from Ridley Road, looking east towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 11:15		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 70° from North		Distance from site. 266m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	





Description: View from xxxxxx

VIEWPOINT 9 - SINGLE FRAME

Approximate extent of the Site

Crest Building

Ethelbert Road



VIEWPOINT 10

[FOR CONTEXT ONLY]

Description: View from Church House Gardens, looking east towards the Site.

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 11:46		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 19 of 72	
Direction of View (Clockwise). 90° from North	Distance from site. 140m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.	



Description: View from Church House Gardens, looking east towards the Site.

VIEWPOINT 10 - SINGLE FRAME

Approximate extent of the Site



VIEWPOINT 11

[FOR CONTEXT ONLY]

Description: View from the grounds of Churchill Theatre, looking south.

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 10:22		Visualisation Type. Type 1		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 21 of 72	
Direction of View (Clockwise). 180° from North	Distance from site. 159m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	
						Rev.	



Description: View from the grounds of Churchill Theatre, looking south.

VIEWPOINT 11 - SINGLE FRAME



VIEWPOINT 12
[FOR CONTEXT ONLY]

Description: View from View from Bromley High Street, looking south.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 05/12/2020 @ 10:24		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 23 of 72
Direction of View (Clockwise). 190° from North	Distance from site. 178m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.





Description: View fromView from Bromley High Street, looking south.

VIEWPOINT 12 - SINGLE FRAME



VIEWPOINT 13
 [FOR CONTEXT ONLY]

Description: View from Bromley High Street, at the junction of Market Square and the High Street, looking south.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 07/03/2021 @ 11:35		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 25 of 72
Direction of View (Clockwise). 190° from North	Distance from site. 323m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Bromley High Street, at the junction of Market Square and the High Street, looking south.

VIEWPOINT 13 - SINGLE FRAME



VIEWPOINT 14

[FOR CONTEXT ONLY]

Description: View from the junction of Church Road and Tetty Way, looking south.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 11:26		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 27 of 72
Direction of View (Clockwise). 170° from North	Distance from site. 373m		Projection. Cylindrical	Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.





Description: View from the junction of Church Road and Tetty Way, looking south.

VIEWPOINT 14 - SINGLE FRAME



VIEWPOINT 15

[FOR CONTEXT ONLY]

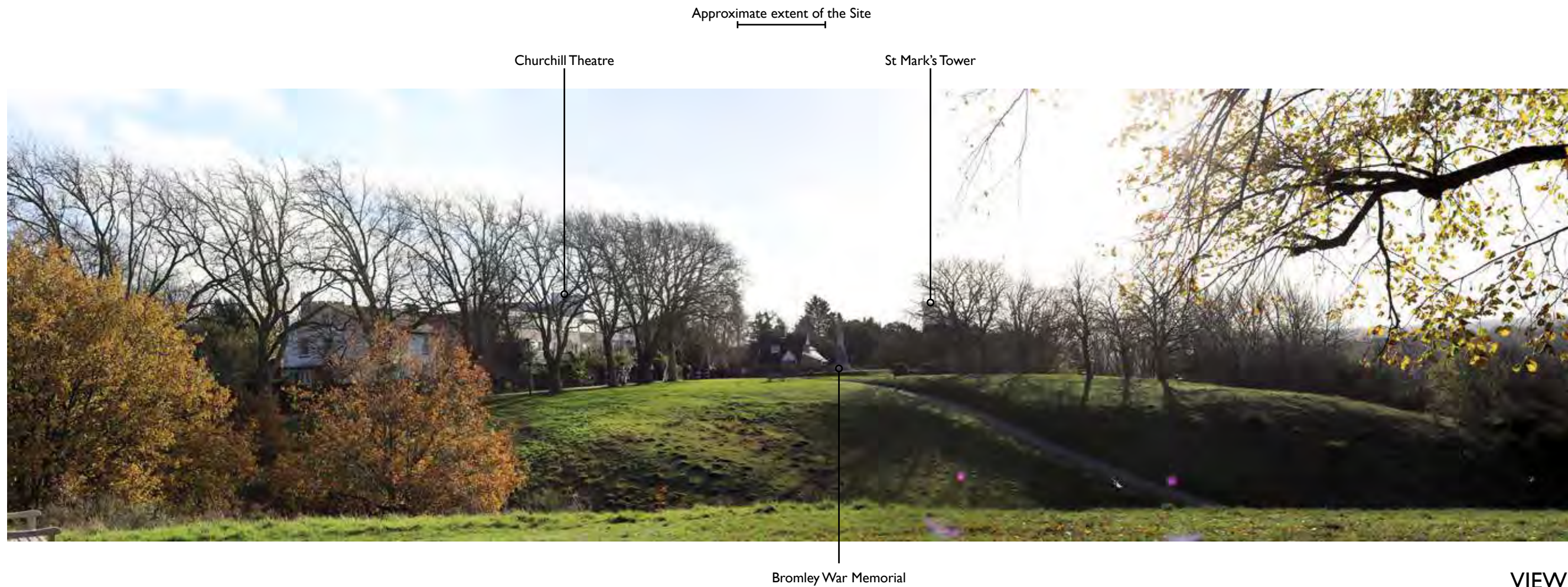
Description: View from Church House Gardens adjacent to the Church of St Peter and St Paul, looking south.

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05		
Date & time of photograph. 07/03/2021 @ 11:22		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 29 of 72	
Direction of View (Clockwise). 150° from North	Distance from site. 313m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.	



Description: View from Church House Gardens adjacent to the Church of St Peter and St Paul, looking south.

VIEWPOINT 15 - SINGLE FRAME



VIEWPOINT 16

[FOR CONTEXT ONLY]

Description: View from Martin's Hill looking south towards Bromley Town Centre. The Bromley War Memorial is in the foreground of the view.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 11:26		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 150° from North		Distance from site. 535m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG Approved By. KF		Sheet Number. 31 of 72	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from Martin's Hill looking south towards Bromley Town Centre. The Bromley War Memorial is in the foreground of the view.

VIEWPOINT 16 - SINGLE FRAME



VIEWPOINT 17

[FOR CONTEXT ONLY]

Description: View from Martin's Hill recreation ground, looking east towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 11:11		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 130° from North		Distance from site. 658m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	





Description: View from Martin's Hill recreation ground, looking east towards Bromley Town Centre.

VIEWPOINT 17 - SINGLE FRAME



VIEWPOINT 18

[FOR CONTEXT ONLY]

Description: View from A222, opposite Bromley College..

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 10:17		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 35 of 72	
Direction of View (Clockwise). 150° from North	Distance from site. 634m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	
						Rev.	



Description: View from A222, opposite Bromley College.

VIEWPOINT 18 - SINGLE FRAME



VIEWPOINT 19

[FOR CONTEXT ONLY]

Description: View from the A21 at the junction, between Farwig Lane and Hammelton Road, looking south towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 10:23		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 160° from North		Distance from site. 996m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG Approved By. KF		Rev.	





Description: View from the A21 at the junction, between Farwig Lane and Hammelton Road, looking south towards Bromley Town Centre.

VIEWPOINT 19 - SINGLE FRAME

Approximate extent of the Site

St Mark's Tower



VIEWPOINT 20
[FOR CONTEXT ONLY]

Description: View from Beckenham Lane, opposite Shortlands railway station, looking south-east.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 11:03		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 130° from North		Distance from site. 1075m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from Beckenham Lane, opposite Shortlands railway station, looking south-east.

VIEWPOINT 20 - SINGLE FRAME

Approximate extent of the Site



St Mark's Tower



VIEWPOINT 21

[FOR CONTEXT ONLY]

Description: View from Farnaby Road, looking south-east across Shortlands Golf Course towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 10:42		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 41 of 72	
Direction of View (Clockwise). 140° from North	Distance from site. 1539m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Farnaby Road, looking south-east across Shortlands Golf Course towards Bromley Town Centre.

VIEWPOINT 21 - SINGLE FRAME



VIEWPOINT 22
[FOR CONTEXT ONLY]

Description: View from Plaistow Lane, looking south-west towards Bromley Town Centre.

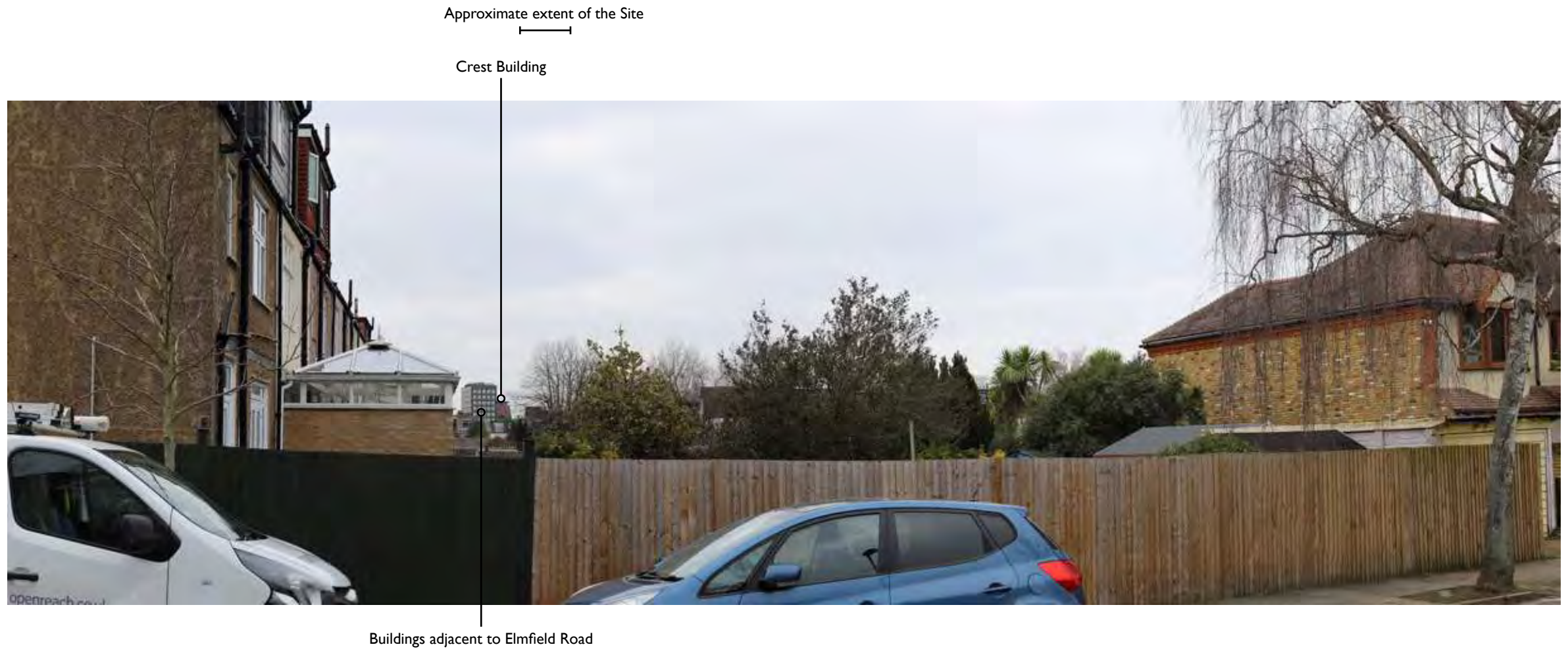
VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 12:26		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 130° from North		Distance from site. 1250m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from Plaistow Lane, looking south-west towards Bromley Town Centre.

VIEWPOINT 22 - SINGLE FRAME



VIEWPOINT 23
[FOR CONTEXT ONLY]

Description: View from Bishops Avenue, looking west towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 12:48		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 45 of 72
Direction of View (Clockwise). 290° from North	Distance from site. 924m		Projection. Cylindrical	Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.





Description: View from Bishops Avenue, looking west towards Bromley Town Centre.

VIEWPOINT 23 - SINGLE FRAME

Approximate extent of the Site

Buildings adjacent to St Mark's Tower Elmfield Road

The Mall Tower



VIEWPOINT 24
[FOR CONTEXT ONLY]

Description: View from The Chase looking west towards Bromley High Street.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05
Date & time of photograph. 05/12/2020 @ 12:07		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 47 of 72
Direction of View (Clockwise). 270° from North	Distance from site. 554m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.





Description: View from The Chase looking west towards Bromley High Street.

VIEWPOINT 24 - SINGLE FRAME



VIEWPOINT 25
[FOR CONTEXT ONLY]

Description: View from Murray Avenue, looking west towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 12:53		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 49 of 72
Direction of View (Clockwise). 290° from North	Distance from site. 608m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Murray Avenue, looking west towards Bromley Town Centre.

VIEWPOINT 25 - SINGLE FRAME



VIEWPOINT 26

[FOR CONTEXT ONLY]

Description: View from the A21 on the southern approach to Bromley.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II			Focal Length. 50mm	Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 10:49			Visualisation Type. Type I	Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 51 of 72
Direction of View (Clockwise). 310° from North	Distance from site. 579m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.





Description: View from the A21 on the southern approach to Bromley.

VIEWPOINT 26 - SINGLE FRAME

Approximate extent of the Site

St Mark's Tower

St Mark's Church



VIEWPOINT 27

[FOR CONTEXT ONLY]

Description: View from Cameron Road, looking north towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION		
Camera make & model. Canon EOS 6D Mark II			Focal Length. 50mm	Project Title. Ringer's Road, Bromley	Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 11:01			Visualisation Type. Type I	Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 53 of 72
Direction of View (Clockwise). 355° from North	Distance from site. 590m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Cameron Road, looking north towards Bromley Town Centre.

VIEWPOINT 27 - SINGLE FRAME



VIEWPOINT 28

[FOR CONTEXT ONLY]

Description: View from the junction of Cumberland Road and Durham Avenue looking east.

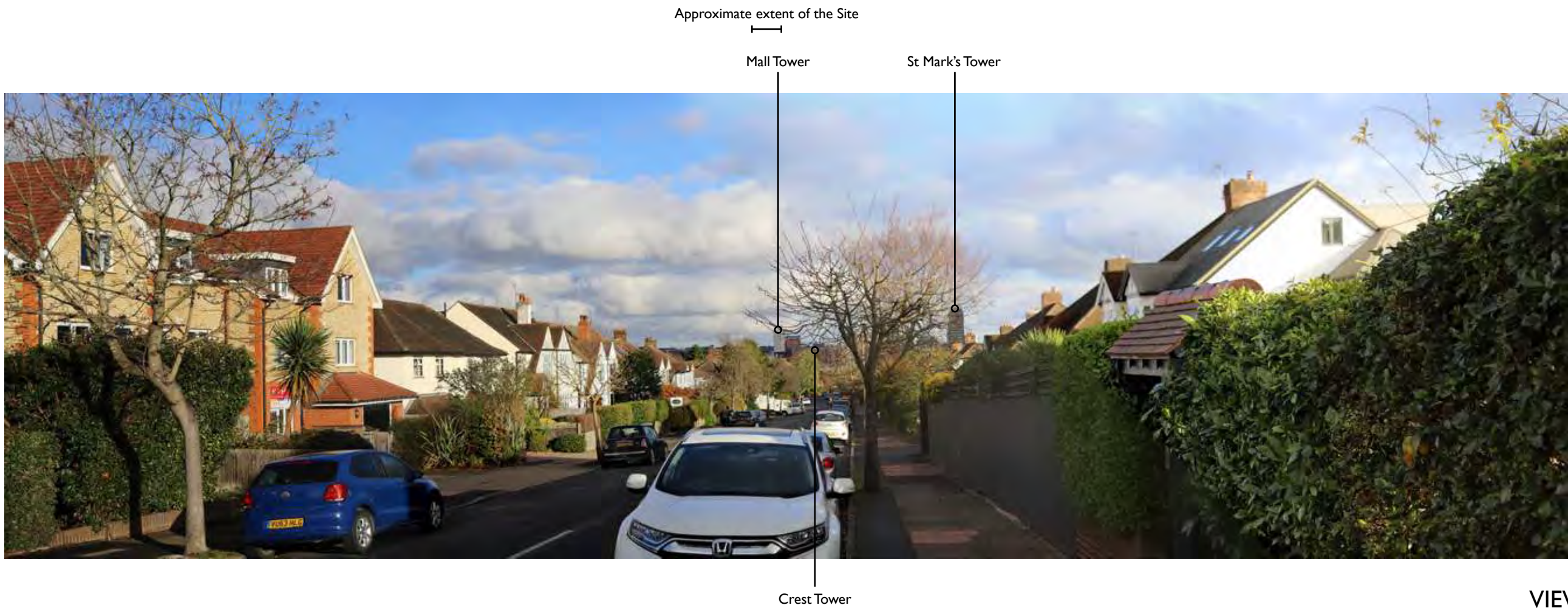
VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 14:25		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 55 of 72	
Direction of View (Clockwise). 45° from North	Distance from site. 710m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	Rev.





Description: View from the junction of Cumberland Road and Durham Avenue looking east.

VIEWPOINT 28 - SINGLE FRAME



VIEWPOINT 29

[FOR CONTEXT ONLY]

Description: View from Cumberland Road looking east.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 14:30		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 57 of 72	
Direction of View (Clockwise). 55° from North	Distance from site. 1108m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	Rev.





Description: View from Cumberland Road looking east.

VIEWPOINT 29 - SINGLE FRAME



VIEWPOINT 30

[FOR CONTEXT ONLY]

Description: View from the junction of Kingswood Road, May's Hill Road and Hillside Road, looking east.

VIEWPOINT INFORMATION				PROJECT INFORMATION			ETLA
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley	Figure Number. L05		
Date & time of photograph. 05/12/2020 @ 14:12		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 59 of 72	
Direction of View (Clockwise). 100° from North	Distance from site. 700m	Projection. Cylindrical		Drawn By. MG Approved By. KF	Date. 16/03/2021	Rev.	



Description: View from the junction of Kingswood Road, May's Hill Road and Hillside Road, looking east.

VIEWPOINT 30 - SINGLE FRAME



VIEWPOINT 31
 [FOR CONTEXT ONLY]
Description: View from Southlands Park.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 14:57		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 300° from North		Distance from site. 1928m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG		Approved By. KF	
				Date. 16/03/2021		Rev.	





Description: View from Southlands Park.

VIEWPOINT 31 - SINGLE FRAME



VIEWPOINT 32
[FOR CONTEXT ONLY]

Description: View from Norman Park, looking north towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 12:35		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 320° from North		Distance from site. 1829m		Projection. Cylindrical		Sheet Number. 63 of 72	
				Drawn By. MG Approved By. KF		Date. 16/03/2021	
						Rev.	





Description: View from Norman Park, looking north towards Bromley Town Centre.

VIEWPOINT 32 - SINGLE FRAME

Approximate extent of the Site



VIEWPOINT 33

[FOR CONTEXT ONLY]

Description: View from Langley Park, looking east towards Bromley Town Centre.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 14:03		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 50° from North		Distance from site. 2568m		Projection. Cylindrical		Date. 16/03/2021	
				Drawn By. MG Approved By. KF		Sheet Number. 65 of 72	
				Date. 16/03/2021		Rev.	

ETLA



Description: View from Langley Park, looking east towards Bromley Town Centre.

VIEWPOINT 33 - SINGLE FRAME



VIEWPOINT 34

[FOR CONTEXT ONLY]

Description: View from Chesham Avenue, looking west.


VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 07/03/2021 @ 15:22		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 67 of 72	
Direction of View (Clockwise). 305° from North	Distance from site. 3828m		Projection. Cylindrical	Drawn By. MG	Approved By. KF	Date. 16/03/2021	Rev.

ETLA



Description: View from Chesham Avenue, looking west.

VIEWPOINT 34 - SINGLE FRAME

Approximate extent of the Site




VIEWPOINT 35

[FOR CONTEXT ONLY]

Description: View from Hayes Heath, looking north.

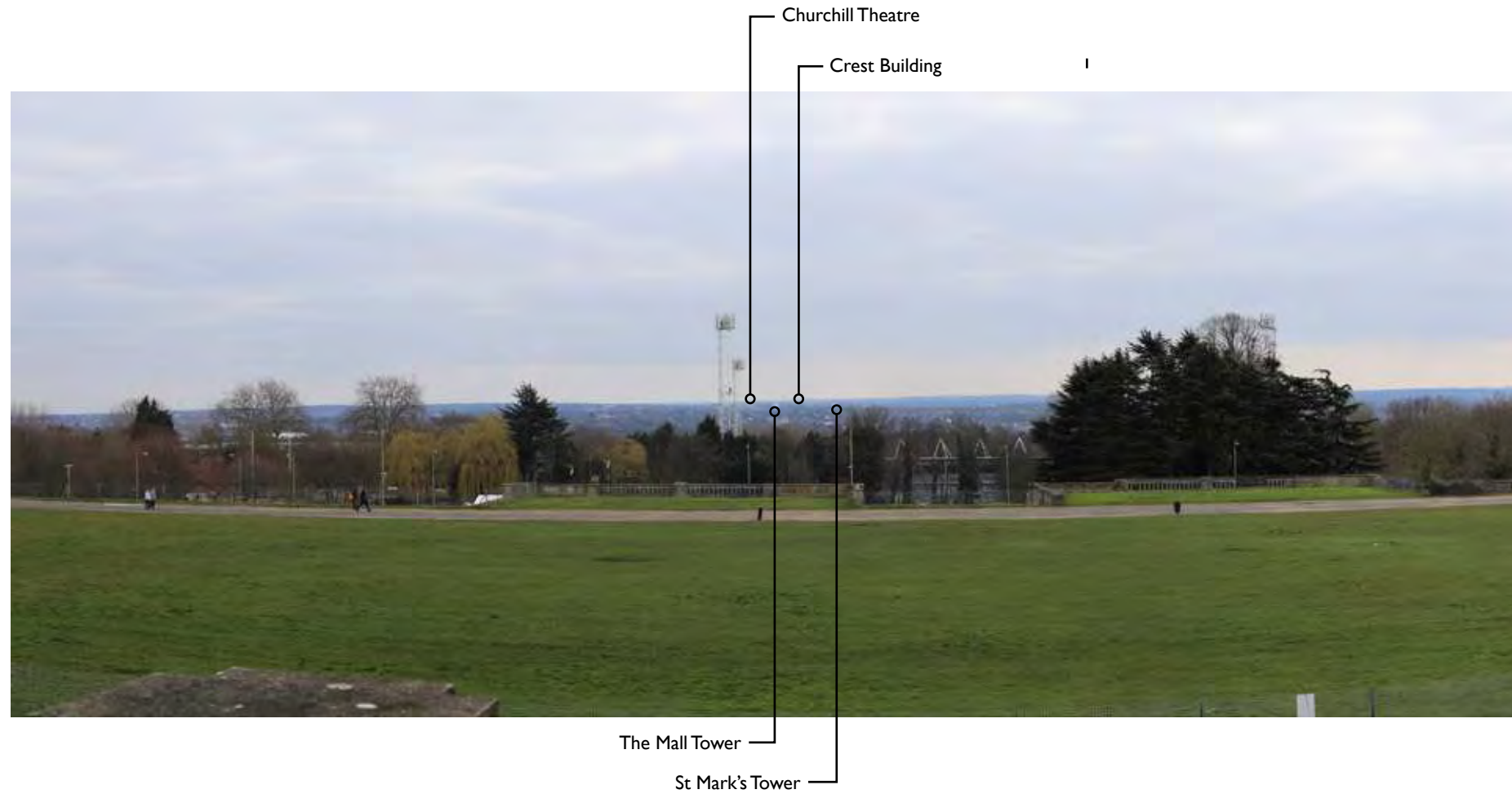
VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	
Date & time of photograph. 05/12/2020 @ 13:15		Visualisation Type. Type I		Drawing Title. Site Context Photos		Project Number. 0296	
Direction of View (Clockwise). 340° from North		Distance from site. 4139m		Projection. Cylindrical		Sheet Number. 69 of 72	
				Drawn By. MG Approved By. KF		Date. 16/03/2021	
						Rev.	

ETLA



Description: View from Hayes Heath, looking north.

VIEWPOINT 35 - SINGLE FRAME



VIEWPOINT 36
[FOR CONTEXT ONLY]

Description: View from Crystal Palace Park, looking east towards Bromley.

VIEWPOINT INFORMATION				PROJECT INFORMATION			
Camera make & model. Canon EOS 6D Mark II		Focal Length. 50mm		Project Title. Ringer's Road, Bromley		Figure Number. L05	ETLA
Date & time of photograph. 07/03/2021 @ 13:48		Visualisation Type. Type I		Drawing Title. Site Context Photos	Project Number. 0296	Sheet Number. 71 of 72	
Direction of View (Clockwise). 120° from North	Distance from site. 6584m	Projection. Cylindrical		Drawn By. MG	Approved By. KF	Date. 16/03/2021	
						Rev.	



Description: View from Crystal Palace Park, looking east towards Bromley.

VIEWPOINT 36 - SINGLE FRAME