



Proof of Evidence

by Amanda Reynolds RIBA, MA (UD)

2-4 Ringers Rd, Bromley BR1 1HT

for Bromley Council

June 2024

Town and Country Planning Act 1990
Appeal by Ringers Road Properties Ltd

In respect of the refusal of planning permission by
the London Borough of Bromley for an application
on a site at 2-4 Ringers Road and 5 Ethelbert Rd,
Bromley Town Centre

Proof of Evidence

by Amanda Reynolds, Architect and Urban Designer

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Council refs: DC/21/05585/FULL1

PINS refs: APP/G5180/W/24/3340223

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Fig. 1.1 View down Ethelbert Rd with the appeal site existing buildings to the left and Salvation Army access ramp in foreground; greenery from private gardens and the local park defining the street edge on the right.



Introduction and Scope of Evidence

1.1 Name and Qualifications

1.1.1 My name is Amanda Reynolds. I hold a Bachelor of Architecture degree (NZ) and a Master of Arts in Urban Design (Distinction) (UK). I am registered to practise architecture in the UK and New Zealand and have worked extensively on a range of architecture and urban design projects in both countries as well as in Australia and Scandinavia. I have lived and worked in London for over 25 years.

1.1.2 I have over 35 years of experience as an architect and over 25 years of experience in urban design. I am a member of the Royal Institute of British Architects and a Fellow of the New Zealand Institute of Architects. I sit on the executive Committee of the Urban Design Group and held the position of Chair of the Urban Design Group for two years.

1.1.3 I am a Design Council Design Expert and a member of various Design Review Panels in London and beyond (including LB Bromley, Lewisham and Tower Hamlets) as well as co-Chair of the panel for Enfield. I am also appointed as a High Street Expert by the High Streets Task Force.

1.1.4 I established my consultancy practice (AR Urbanism) in December 2007 and prior to that I was Practice Director (Urban Design) at the planning and architecture practice Llewelyn Davies, where I led a team of 20 urban designers, architects and landscape designers.

1.1.5 My practice undertakes urban design and masterplanning project work, spanning from strategic planning frameworks and Town Centre Regeneration projects to single-site masterplans, throughout the UK and overseas. The practice has won design awards for masterplanning and urban design projects both in the UK and Scandinavia.

1.1.6 As part of my role I act as a design advisor to a range of clients in both the public and private sectors, including as an expert witness to Public Inquiries in this capacity.

1.2 Role on this Project

1.2.1 I am acting as an independent urban design witness in support of the London Borough of Bromley's (LBB) Reasons for Refusal nos 3, 4 & 5 of the planning application in question, following the appeal brought against the LPA's refusal of the application. I was appointed by LBB in May 2024. I have previous involvement in the project in that I was a member of the Design Review Panel which assessed the proposal on 15th April 2021.

1.2.2 Prior to being appointed as an expert witness on this appeal I have previously acted in an advisory role for LBB on other development sites in the town centre close to the appeal site, notably 66-70 High St and the Churchill Gardens site to the north off Ethelbert Rd. I am not a Conservation Architect or heritage expert therefore I comment on historic buildings, heritage contexts and conservation areas from townscape and design points of view only.

1.2.3 As part of agreeing to act as a witness in support of the Council's case, I reviewed a range of drawings and documents relating to this case, as set out in the Statement of Case (SoC CD 10.1), including the following, and I refer to these throughout this proof:

- The LBB Local Plan: including Site Allocation 10, SPDs Urban Design and Bromley Town Centre
- The Appellant's architect's original and amended application drawings and Design and Access Statement (DAS);
- The landscape architect's Design Statement and Drawings;
- Landscape and Visual Appraisal Views, TVIA;
- Draft Statement of Case (SoC) including the Case Officer's Report to Committee;

1.2.4 Having reviewed these documents I was satisfied that I agreed with the design reasons for refusing permission.

1.2.5 I confirm that the evidence that I have prepared and provide for this Appeal is given in accordance with my professional opinion and in accordance with the guidance of my professional institution (Royal Institute of British Architects, RIBA). I am familiar with the area and visited the appeal site and surroundings in May and June 2024.

1.3 Description of the Site & Proposal

1.3.1 The **appeal site** is within the town centre of Bromley, located to the west of the High St on sloping land, just south of its pedestrianised section. The site measures approximately 0.10 hectares (1,000 sqm) and is an irregular shape fronting, to the south, Nos.2-4 Ringers Road and to the north Nos. 3-5 Ethelbert Road. The site slopes markedly to the west, as well as to the south and is closely bounded to the east and west by 2-4 storey buildings, generally in residential use (to the west) and commercial use (to the east, towards the High St).

1.3.2 The **appeal proposal** consists of 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 (Revised scheme incorporating a second stair into Block A and Block B, internal layout and elevational changes, and changes to the on street parking bays and footpath along Ringers Road and Ethelbert Road) at 2-4 Ringers Road and 5 Ethelbert Road, BR1 1HT.

1.4 Scope of Assessment

1.4.1 My assessment will address the urban design and architectural merits of the appeal proposal, including but not limited to: height, massing, density and impact on existing and emerging local context; the townscape impact and impact on local views and existing residents of the proposed taller buildings.

1.4.2 Where relevant, I may refer to other appeals and other applications for this site as well as other relevant consented and constructed buildings in the local area. Further witnesses will address heritage, sunlight/daylight and planning policy. I defer to their evidence on those matters.

1.5 Reasons for Refusal (RfR) and the Main Design Issues

1.5.1 The main Reason for Refusal addressed in this proof is RfR no.3, while nos. 4&5 also include design issues to be addressed, as highlighted (my bold) below.

Reason 3. The proposed development, by reason of its **siting, height, scale, massing and appearance** would appear as an **over-intensive development** within a confined site and would **prejudice the development potential of the adjoining sites** within the allocated Site 10 in the Local Plan. The proposal would appear as an **overly dominant and overbearing** addition to the town centre skyline and out of context with its immediate surroundings. The proposed development would therefore **cause harm to the character and appearance of the area** and fail to preserve or enhance the setting of the Bromley Town Centre Conservation Area, contrary to London Plan Policies D1, D3, D4, D7, D9 and HC1; Local Plan Policy 37, 42, 47, 48 and Site Allocation 10; Bromley Urban Design SPD and Bromley Town Centre SPD.

Reason 4. The proposed development, by reason of a high proportion of single aspect units offering **poor outlook and daylight conditions**, mutual overlooking and inadequate provision of **children's playspace**, is reflective of an **over-development** of the site resulting in a **compromised internal layout**, which would not provide a satisfactory standard of residential accommodation. Consequently, the proposal is contrary to the provisions of London Plan Policies D3, D5, D6, D7 and S4; Local Plan Policies 4 and 37; Housing Design LPG; and Play and Informal Recreation SPG.

Reason 5. The proposed development, by reason of its **siting, height, scale, massing and design** would appear as **overbearing** when viewed from nearby residential properties and their external amenity spaces and would lead to an adverse loss of light and privacy, thereby **harming the living conditions** of the surrounding residential occupiers, contrary to Local Plan Policies 37 and 47, and Site Allocation 10 and Bromley Urban Design SPD.

1.5.2 The **main design and townscape issues** are summarised as follows:

- **overdevelopment arising from siting, height, scale, massing and appearance;**
- **overdominant and overbearing appearance;**
- **impact on future development of adjacent sites;**
- **impact on the town centre and wider context views;**
- **compromised residential layout and amenity provision on site;**
- **compromised living conditions for neighbouring residents.**



Fig. 2.1 Map of site location in its wider context of Bromley Town Centre and beyond.

2

Policy Context

2.1 National Planning Policy Framework (NPPF) 2023

2.1.1 Government Policy set out in the NPPF places a strong emphasis on good design as a key element in effective place-making, which will contribute to the creation and continuation of sustainable communities. On 20th December 2023 a revised and updated iteration of the NPPF was published and the references in this proof are related to this version unless otherwise expressly stated.

2.1.2 Section 12 ‘Achieving Well-Designed and Beautiful Places’ of the NPPF discusses the importance and value of good design (the word ‘beautiful’ has been added in the latest version). Paragraph 131 explains that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development.

2.1.3 Paragraphs 132 - 134 recognise that design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area’s defining characteristics. The Government encourages the use of design codes to provide a framework for creating distinctive places with a consistent and high quality standard of design.

2.1.4 Paragraph 135 explains that both planning policies and decisions should ensure that developments function well and add to the overall quality of the area over their lifetime; are visually attractive, sympathetic to local character and establish or maintain a strong sense of place. Policies and decisions should seek to optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible to all.

2.1.5 Paragraph 139 explains that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way in which it functions, including outstanding or innovative designs which promote high levels of sustainability.

2.2 National Design Guide (NDG) 2021

2.2.1 The National Design Guide 2021 supersedes the NPPG as part of the NPPF suite of documents and includes the NPPG’s original design principles as well as expanding on these. The purpose of the guide is to illustrate “how well-designed places that are beautiful, enduring and successful can be achieved in practice”. Little has substantially changed in the updated section of the revised NPPF.

2.2.2 The guide sets out ten characteristics of well-designed places and expands on how these are to be achieved in practice, including providing good practice case studies for each of the ten characteristics. I assess the appeal proposal for its performance in terms of these characteristics, the most relevant of which are set out below:

- Context – enhances the surroundings.
- Identity – attractive and distinctive.

-
- Built form – a coherent pattern of development.
 - Movement – accessible and easy to move around.
 - Nature – enhanced and optimised.
 - Public spaces – safe, social and inclusive.
 - Uses – mixed and integrated
 - Homes & Buildings - functional, healthy & sustainable

2.2.3 The above characteristics are taken into consideration in the Design Appraisal section of this proof, s.4.0.

2.3 London Plan (CD 4.3)

2.3.1 The London Plan comprises the Mayor of London’s Sustainable Development Strategy published in accordance with the provisions of the Greater London Authority Act 1999 (as amended) and it forms part of the Development Plan for Bromley.

2.3.2 The most relevant policies of the existing London Plan are listed within the SoC, the SoCG and the Officers’ Report. Sections 7.1-7.7, from the ‘Place-Shaping’ section are of most relevance to the project, including the following:

- Policy D.1 London’s Form, Character and Capacity for Growth
- Policy D.3 Optimising Site Capacity through a Design-Led Approach
- Policy D.4 Delivering Good Design
- Policy D.5 Inclusive Design
- Policy D.6 Housing Quality and Standards
- Policy D.9 Tall Buildings
- Policy HC1 Heritage Conservation & Growth
- Policy S4 Play and Informal Recreation
- LPG Housing Design
- LPG Optimising Site Capacity

2.4 Bromley Local Plan 2019 (CD 4.1)

2.4.1 The following policies are those which have most relevance to the appeal site:

- Policy 4 Housing Design
- Policy 37 Design
- Policy 42 Development Adjacent to a Conservation Area
- Policy 47 Tall and Large Buildings
- Policy 48 Skyline
- Site Allocation 10
- Bromley Urban Design SPD
- Bromley Town Centre SPD

2.4.2 In addition to the above, there is an earlier AAP, referenced in the appellant's DAS, which is *"an extant Development Plan Document, but its weight is very limited given its age and the fact that it has been **superseded by the adoption of the Local Plan and London Plan**. The London Plan sets out a design-led approach and detailed criteria to assess tall buildings; this would supersede any potential tall building locations identified in the AAP."* Committee Report, para 5.8

2.4.3 Opportunity Site G, also referenced in the DAS, is **superseded by Site Allocation 10** as stated in the Local Plan Appendix 10.15, p. 407.

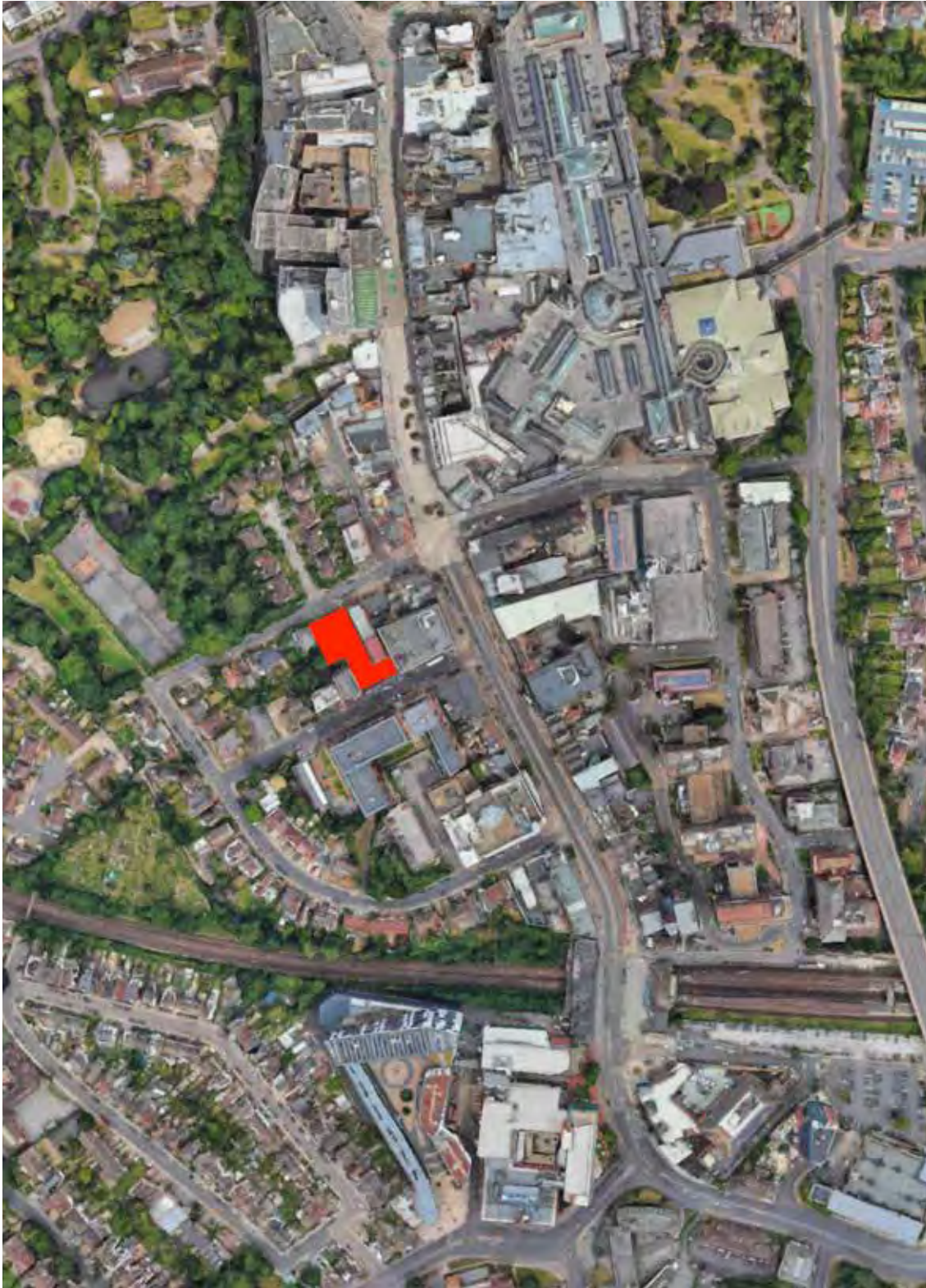


Fig. 3.1 Local context aerial photograph showing site position.

3

Context and Site Analysis

3.1 Broader Context

3.1.1 The Broader context of the appeal site includes the whole of the town centre, the nearby residential areas, particularly to the east and west of the town centre, and views out towards the surrounding green hills, largely to the south, south east and south west because of the local topography.

3.1.2 The town centre's location originates on an upper plateau, including the pedestrianised High St area, which then descends south on a gently sloping promontory, to the more recently developed area of Bromley South which includes its eponymous railway station. To the north and somewhat separated from the heart of the town centre is a further station Bromley North, which as a terminus station is less busy than its twin to the south.

3.1.3 The town centre includes a High St, the theatre/library building, a large shopping centre (The Glades) and some smaller arcades, a number of office buildings (some recently refurbished and new ones under constructing to the east of the High St on Elmfield Rd), as well as ancillary parking buildings. The Council's civic centre is further to the east, just outside the town centre, on a large site soon to be partly vacated and redeveloped for housing.

3.1.4 The underlying topography of the town centre, as shown in the diagram fig 3.2, following page, is an important component in the town's character and should strongly inform the scale and form of development for future transformation of the centre.

3.1.5 The main retail area of Bromley - the large Glades shopping centre and the upper part of the High St - sits on a flat-ish plateau projecting south into the urban landscape. The High St then follows a sloping ridge in a southerly direction towards the railway station, with steeper slopes falling away to the east and west towards the suburban housing areas. The area to the south of the railway station, parts of which are currently being developed, is functionally a lower plateau that defines the southern termination of the town centre.

3.1.6 Land to the east and west of the High St itself and on these steeper slopes has historically contained a mix of commercial and residential uses with more residential uses to the west.

3.1.7 This historic development pattern is reminiscent of traditional hill town developments where the most important and largest buildings are placed on the hilltop and both the scale and importance - in use terms - of the surrounding urban form steps down, in concert with the natural topography, towards the lower levels (see sketches figs 3.3 & 3.4).

3.1.8 While modern urban typologies do not necessarily need to be tied to topography, good urban design principles will reflect and respond to land forms and Bromley town centre has clearly developed in this manner. There is considerable value in continuing this urban form in response to local patterns of development and to reinforce a clear hierarchy of building height which steps down from the tallest and most important building at the top of the hill (the Theatre and Library) towards the lowest forms at the town centre edges, which are generally the 2 and 3 storey housing areas.

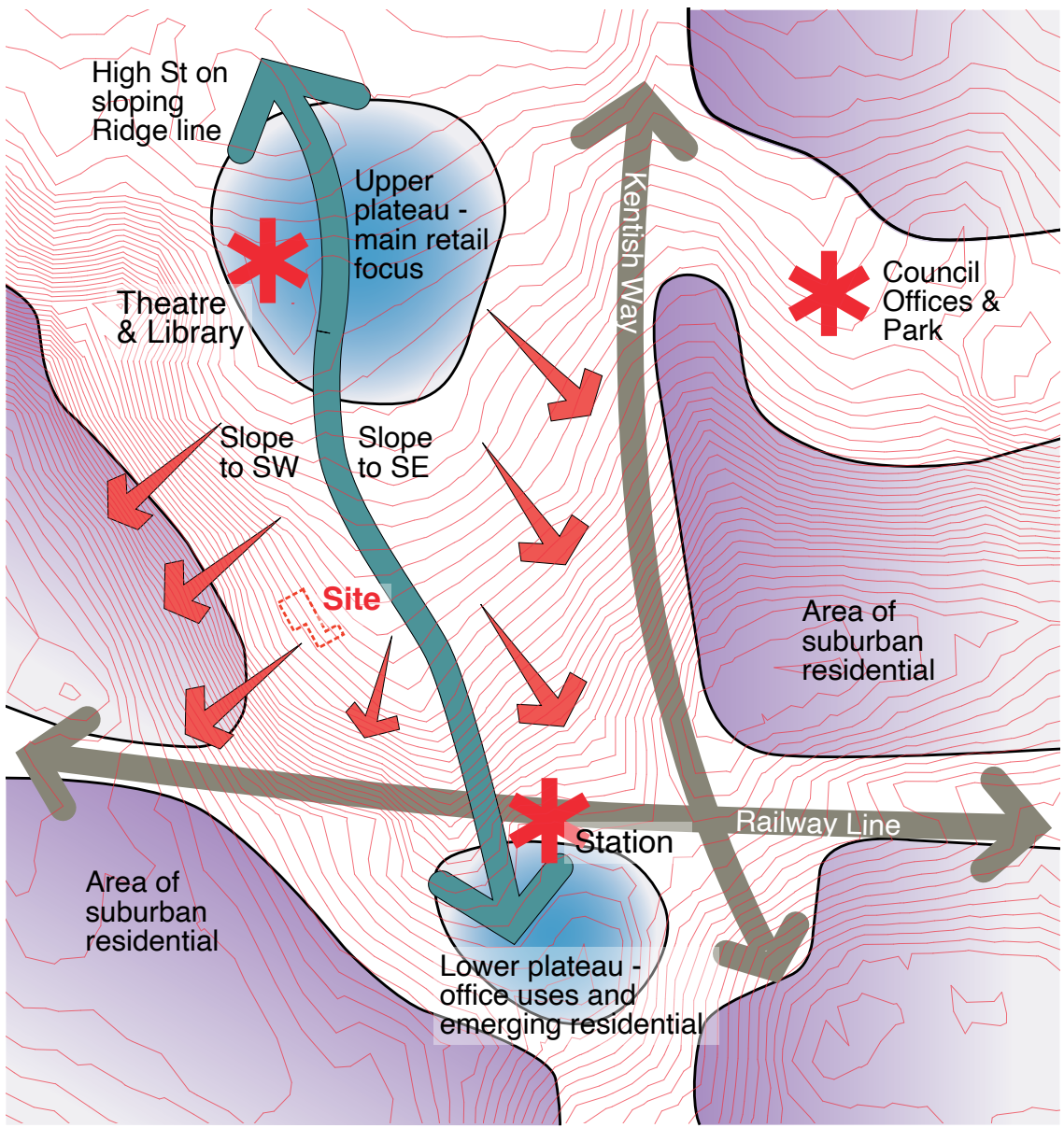


Fig. 3.2 Sketch plan of Bromley Town Centre overlaid on contour plan showing main elements of townscape and current development patterns. Appeal site located to the left of the High St arrow. Contours from Google earth

3.1.9 The new taller developments located in Bromley south, on the 'lower plateau', are responding to both the existing character of this area, which includes larger footprint forms, while also ensuring that the most recent towers are either separated from large areas of existing low-rise residential or step away in height from these forms, ensuring that their negative impact is contained and the stepping approach is reinforced.

3.1.10 The new buildings in Bromley South form a growing mid-rise and taller building cluster within a non-orthogonal street grid, in a formal response to the lower residential and historic buildings which skirt the edge of this cluster. There are a number of tall buildings, both built and planned in this area, and these contribute to a character area with different qualities and visual impacts from the High St plateau and slopes.

3.1.11 This area also forms a clear 'termination' to the High St and town centre, both visually and functionally.

Fig. 3.3 Traditional urban hilltop and hillside building scale and height relationships: tallest, most important buildings at the top with both heights and densities naturally following the contours to step down the slope. The drop in height of buildings is steeper than the slope of the land.

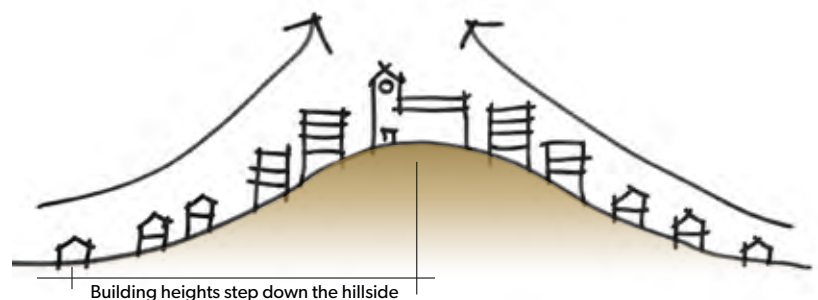


Fig. 3.4 Bromley town Centre variation on above: the High St follows a sloping ridge down from the upper 'plateau' with smaller buildings along the street edge, while taller forms are located as either setbacks to the High St frontage or a block behind the High St. The hillside buildings then step down the contours to meet the lower rise housing below. As with the traditional hilltop structure sketched above, it is worth noting that the drop in height of buildings is steeper than the slope of the land - this ensures that there is a genuine transition overall scale of built form from the taller buildings on upper slopes to the lower areas.

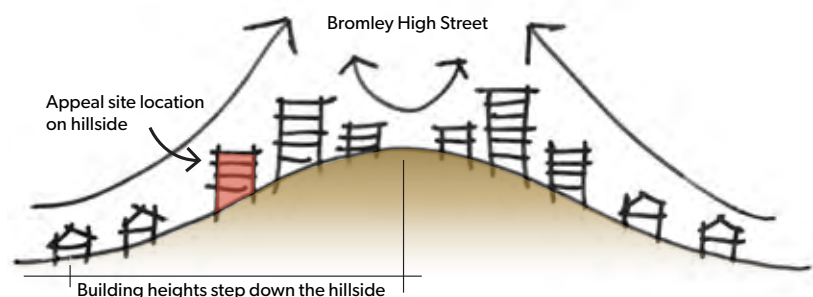




Fig. 3.5 View north on the High St towards the Churchill Theatre and Library



Fig. 3.6 Pedestrianised area of High St including landscaping



Fig. 3.7 Two apartment blocks on Ringers Rd adjacent to appeal site



Fig. 3.8 View up Ringers Rd towards High St. Appeal site on the left between larger buildings opposite existing residential



Fig. 3.9 View down Ethelbert Rd, past the appeal site looking towards green hills and housing with tree'd boundary edges across the street



Fig. 3.10 View up Ethelbert Rd towards High St with Salvation Army buildings to the right

3.2 Historic Context

3.2.1 My proof explores the local historic context insofar as it forms part of the townscape setting for the appeal site. However, as I am not an expert in this field, our heritage witness, Dorian Crone, specifically addresses the heritage issues and levels of harm related to this.

3.2.2 In townscape terms, the appeal site is close to the Town Centre Conservation Area (TCCA - Area Statement CD 5.5) , approximately 40m from the corner of the High St, and any tall buildings on the Ethelbert Rd frontage (and potentially Ringers Rd, depending on height) would be seen from parts of this area - mostly from the pedestrianised section of the High St.

3.2.3 While the Churchill Theatre and Bromley Central Library is not a listed building, it holds the position of being the tallest and most prominent building in the TCCA, and as such is considered to be a landmark building, as well as being a major part of the cultural life of Bromley town centre. The theatre and library therefore is an important element in the local townscape, and the visual impact of views towards new buildings which include this structure merit consideration for their effect on this building and its setting.

3.2.4 Refer also to Dorian Crone’s evidence for heritage impacts.

3.3 Local Context

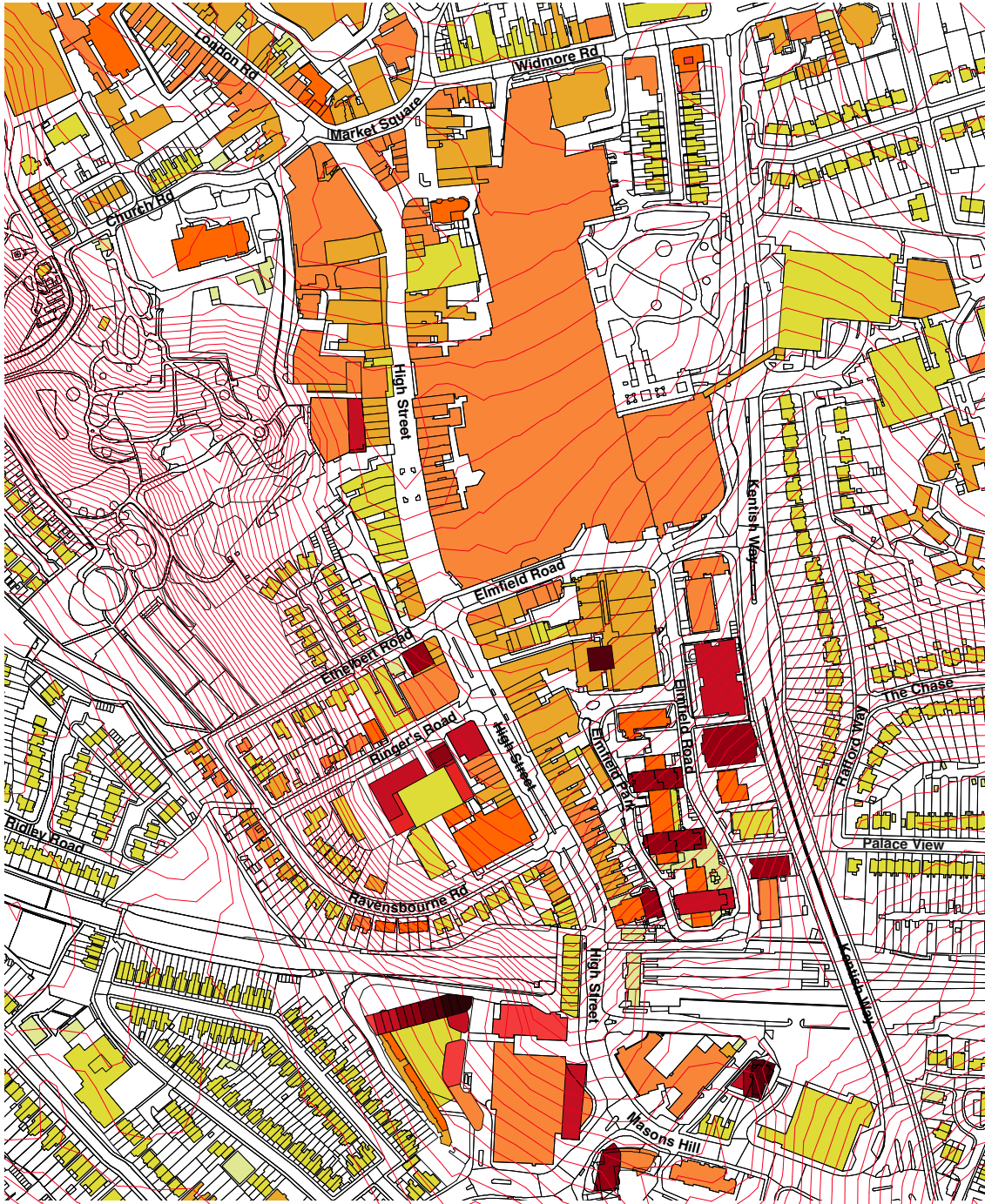
3.3.1 The local context of the appeal site includes the whole urban block defined by Ringers, Ethelbert, and Ravensbourne Roads and the High St. It also includes the areas opposite the site on both its frontages ie: Ethelbert Close, Churchill Way, the Park and Gardens to the north, as well as the recent residential development of Henry and William Houses to the south and their surrounding areas. The station to the south and theatre to the north are important local elements as well as characteristics of the wider area.

3.3.2 The current Local Plan identifies an area as Site Allocation (SA) 10 (CD 4.1), within which the appeal site is located (see diagram fig 3.15 this proof). This overall area is allocated for “Redevelopment for mixed use including 1230 residential units, offices, retail and transport interchange.” The eastern part of the urban block between Ringers and Ethelbert Rds is included in SA 10 and the appeal site is in middle of this block fronting both the streets.

3.3.3 SA 10 identifies relevant points that proposals will be expected to address, including:

- *“Incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location.”*
- *Provide a high quality public realm and accessibility to and through the site.”*

3.3.4 Also, any proposal needs to be *“accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.”*



- | | |
|----------------|----------------|
| ● 1-1.5 Storey | ● 6 Storey |
| ● 2-2.5 Storey | ● 7-9 Storey |
| ● 3 Storey | ● 10-12 Storey |
| ● 4 Storey | ● 13-15 Storey |
| ● 5 Storey | ● 16+ Storey |

Fig. 3.11 Building Heights Plan for the Bromley Town Centre area, including Bromley South, overlaid on a topographical plan showing levels throughout the area. Appeal site location outlined in red.

3.3.5 The appeal site also sits within one of Bromley's Character Areas (Bromley West) and sub-areas (Church House) as described on pp. 47-52 of the Bromley Town Centre SPD (CD 5.2). This sets out a Vision and guidance for design and planning for development in the town centre. The plans for these two areas show an overlap, with the appeal site almost entirely within the Church House sub-area, however as the SA10 area is designed for development, the site should take cognisance of the guidance relating to both the High St and Church House sub-areas.

3.3.6 In contrast to the High St running down a relatively gentle sloping ridge to the south, the streets which fall away to the west are considerably steeper once they move away from their High St junctions, as shown in the Building Heights plan fig. 3.11 opposite, showing the appeal site falling consistently to the west, while its cranked plan form results in the Ethelbert Rd frontage dropping further than that on Ringers Rd.

3.3.7 The site on Ethelbert Rd also faces into Ethelbert Place, a suburban cul-de-sac of 2 storey houses which has had a large-scale development project proposed for it, however this has been withdrawn and there are no current proposals for redevelopment on this site. This site also includes the 2 storey 'Town Church' opposite the appeal site and adjacent to Churchill Way, a service lane which, belying its grandiose name, provides rear access to High st-facing shops.

3.3.8 Between the site and the High St fronting Ethelbert Rd are two low rise buildings owned and occupied by the Salvation Army, as well as the corner building which meets the High St. This site has planning permission for redevelopment, including retention of the existing character frontage, with a 12 storey residential building above retail at ground floor.

3.3.9 Falling to the west along Ethelbert Rd are a number of houses, although some of these are used for office functions or multiple flats. The house immediately to the west of the appeal site is also included in Site Allocation 10.

3.3.10 Bromley Park and Church House Gardens can be accessed from Ethelbert Rd, near its lowest point, and the green aspect from this open space adds a highly green outlook from the southern side of this street, although this is largely experienced further to the west of the site.

3.3.11 To the immediate south of the appeal site across Ringers Rd is an existing recent development of 2 relatively large (for Bromley) residential blocks, Henry House and William House, which vary between 8-10 storeys, depending on which block and at which point along the slope the heights are counted. The taller element of these blocks is appropriately located at the eastern (upper) end of the street, set back from the High St in appropriate 'Bromley Hill Town' terms.

3.3.12 Adjacent to the appeal site towards the High St is a large footprint block (currently occupied by a TKmaxx store), filling its site and rising to 4 storeys of significant height (equivalent residential 5+ storeys) and poor street frontage character along Ringers Rd.

3.3.13 Beyond the appeal site further downhill on Ringers Rd are 2 x 4 storey blocks of flats which are also both within the Site Allocation area, while beyond these, are 3 further blocks of flats and open parking areas, which are not within the site allocation definition.



Fig. 3.12 Ravensbourne Rd to the west of the appeal site at the bottom of the hill

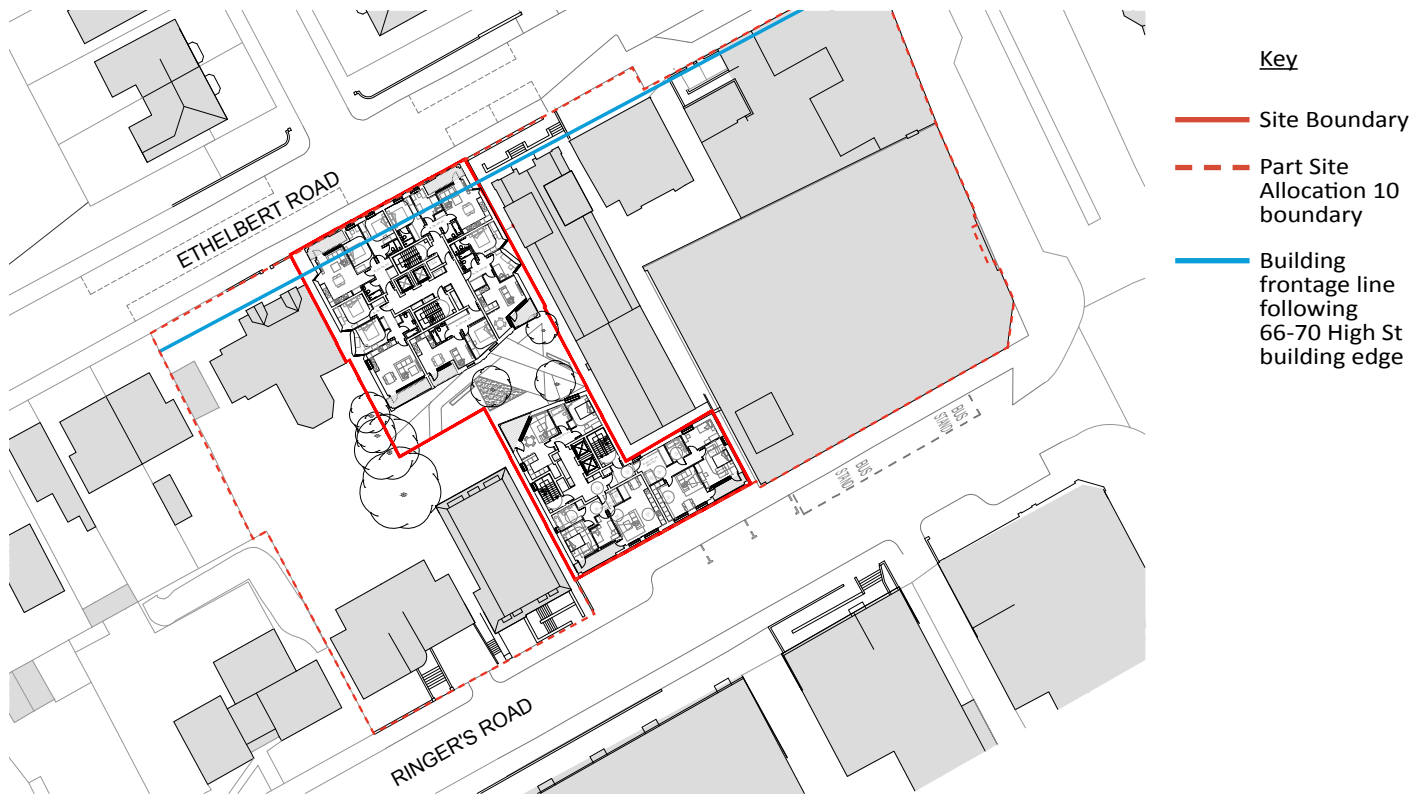


Fig. 3.13 Annotated (by AR) Site Plan by Hollaway Architects showing location of appeal proposal in relation to existing adjacent and nearby buildings and frontage line created by following the built edge (and boundary) of 66-70 High St. All existing buildings on Ethelbert Rd sit behind this line, regardless of actual boundary position.

3.3.14 Ravensbourne Rd at the bottom of the westerly slope of both streets and connecting these, is characterised by built form largely consisting of 2 and 3 storey houses and flatted blocks. This street curves around to meet the High St closer to the station, so has a connectivity role in the local context. It also includes a pedestrian link near the junction with of Ringers Rd to further housing to the west of the Park, along with a wider area to the south and west of the railway line via pedestrian overbridges.

3.3.15 Across Ethelbert Rd to the north is a large area of public open green space, Bromley Park and Church House Gardens. The mature trees in these spaces enhance street edges and views from the town centre and wider suburban areas, including much of the northern side of Ethelbert Rd, further down the slope from the appeal site. Access to these spaces and amenities adds to the attraction of living in Bromley Town Centre.

3.4 The Appeal Site

3.4.1 The appeal site is located off the High St, with frontages on 2 streets and a 'cranked' plan form resulting from the amalgamation of 3 sites within a larger overall area that forms part of Site Allocation 10.

3.4.2 The appeal site frontages are both 40-50m to the west of the High St, on the sloping sections of street, while the site between the two streets also slopes across its north-south axis.

3.4.3 The plan form of the appeal site arises from the agglomeration of 3 sites - an L-shaped one facing Ringers Rd with a wide street frontage, narrowing to half width to the rear. Added to this are two sites on Ethelbert Rd, one continuing the narrow section of the Ringers Rd site northwards, the other an adjacent house - westwards down the hill, rather than up, therefore creating both an interesting and inconvenient cranked shape.

3.4.4 The appeal site therefore wraps itself around 2 existing buildings and should respond to the location, use and fenestration of these buildings, in accordance with policy, as the falling topography combined with the intention to connect the proposed buildings across a contiguous courtyard will require careful consideration of levels.

3.4.5 In addition to respecting the existing buildings, the appeal proposal must also appreciate its role in the potential future development of the sites adjacent to it (as required by SA10) and produce a masterplan which integrates their future development within the larger urban block.

3.4.6 The existing Salvation Army building with a multitude of uses is very close to the appeal site's eastern and part northern boundaries (towards Ringers Rd), while the existing house to the west on Ethelbert Rd is shown built on the boundary between the two sites. The adjacent flats on Ringers Rd to the west of the appeal site are also close to, though not on, the boundary.

3.4.7 In terms of street boundaries, the Ringers Rd site boundary is located in line with the existing building's street frontage, which is also in line with most other buildings along this street, even though their actual boundary lines may well step forward to the back of pavement line progressing down the hill.



Fig. 3.14 Church House sub-Character diagram, including Site Allocation 10. From Bromley Local Plan. Appeal site shown in red.



Fig. 3.15 Opportunities and Constraints diagram (by AR) for the appeal site locating it within the wider block's SA10 development area and noting the physical constraints - not noted anywhere in appellant's DAS. Larger scale plan in Appendix section 1.0.

3.4.8 On Ethelbert Rd, the site boundary projects forward of the existing building to meet the back of pavement line, along with all other properties in the street except for 66-70 High St, on the corner. On this street the houses to the west have front gardens up to the boundary, whereas the commercial buildings (including on the appeal site) have parking, access steps etc, 'filling in' the frontage space. The High St corner building (66-70 High St) is also in line with all the others along Ethelbert Rd, partly because its boundary is also set to the back of pavement, 'enforcing' this position.

3.4.9 The pavement width along Ethelbert Rd is narrower than that of Ringers Rd where it passes the appeal site frontage.

3.4.10 The TC SPD defines character areas throughout the town centre. These can overlap each other, as do the Church House and High St Areas (as shown on the map p.24 in the TC SPD). The appeal site is located largely within the Church House area, while it is also in SA 10, as shown on the diagram opposite fig 3.14, although the SPD says that sites nearer the High St should also reflect that character.

3.5 Site Analysis - Opportunities and Constraints

3.5.1 The appellant's architect's analysis of the site and context is set out in the main DAS pp. 4-19 (CD 1.62 - no changes or additions to this were suggested in the DAS Addendum CD 1.61). The main elements of this section consist of a high level analysis of the local context along with an interpretation of the opportunities of the now-superseded Council AAP, with the site located in Opportunity Site G, as well as citing the Stitch 2018 Masterplan (also covering Site G) which was a developer-sponsored document as part of the Churchill Gardens planning application and has no planning weight.

3.5.2 The relevant policy documents, particularly Site Allocation 10 and the Town Centre SPD, do not seem to be cited in the DAS.

3.5.3 The site itself is poorly examined with an Opportunities and Constraints image provided on p.19 (main DAS) which simply identifies features of the local context. There is no such analysis of the site itself which has led to a failure to understand or integrate the critical constraints of the site, including the topography, adjacent buildings' locations, levels and windows, among other issues.

3.5.4 The analysis section concentrates on perceived 'opportunities' for the site development, including on p.11 the opportunity to "create a tall building" to help mark "a key nodal point formed by Ethelbert Rd crossing over the top of the High St" (Ethelbert Rd does not 'cross the High St' but meets it a junction); also on p.11 there are "multiple opportunities for views" out from a new development; while on p.13 the DAS notes the appeal for 66-70 High St (not resolved at that point) and notes its location ON the junction of Ethelbert Rd and High St, but suggest this is justification for "a taller building to the South side..." understood to mean the appeal site.

3.5.5 The fact that the building closest to the nodal junction (66-70 High St), as noted on p.13, will be the one providing the identity and wayfinding marking seems to have been left out of the analysis process. It is noted that the appeal for this building had not been resolved when the DAS was initially written, but it was allowed soon after and this should have been taken into account in iterations of the application information.

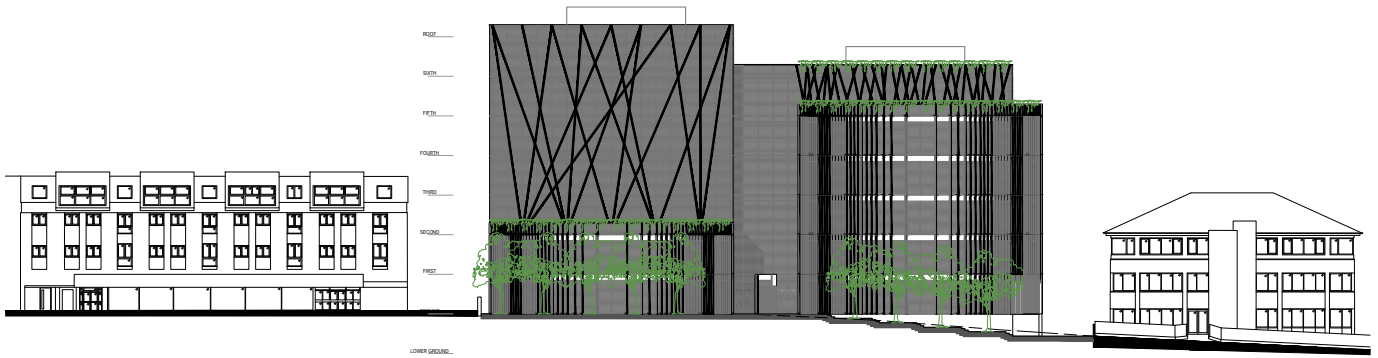


Fig. 3.16 Street elevation of Wells house on Elmfield Rd. At 7 storeys it is taller than the current building heights on Elmfield Rd but lower than the 10 storey blocks closer to the High St, creating a transition towards local housing to the east. NTS

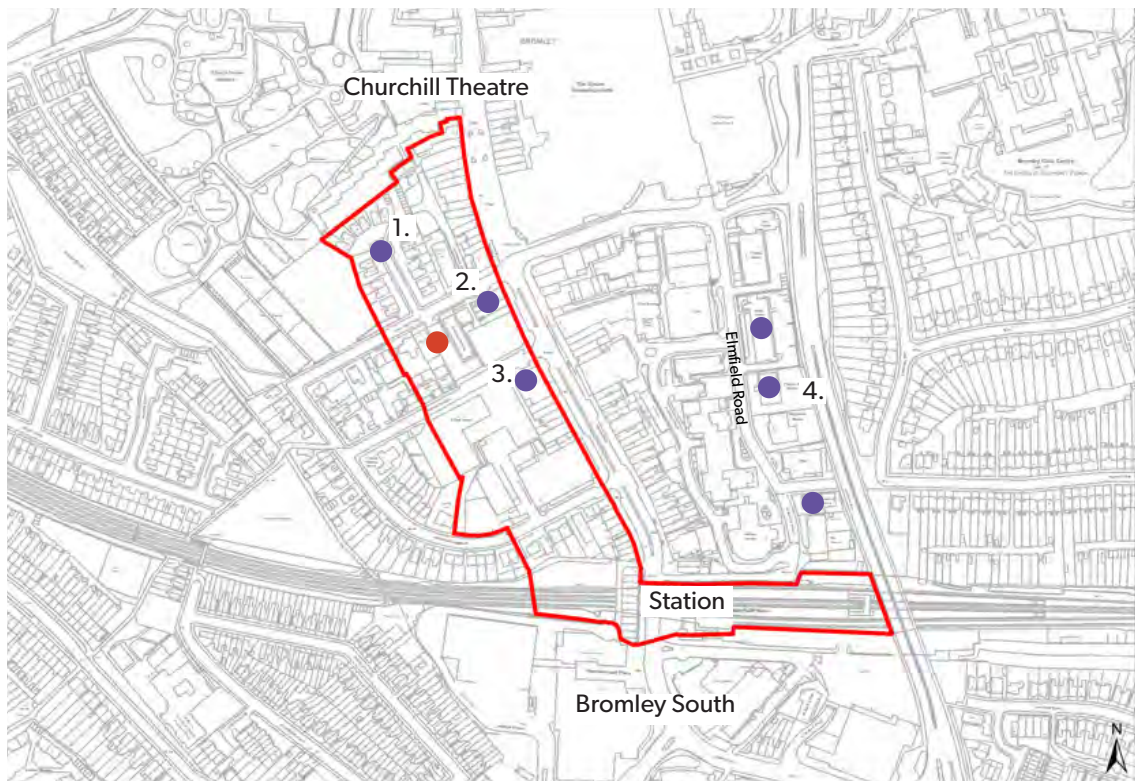


Fig. 3.17 Map of Bromley town centre area showing SA10 boundary plus location of recent and emerging new buildings and consented planning applications. Appeal site noted in red.

3.5.6 There is no townscape analysis provided looking at potential scale and form which could integrate or enhance the existing and emerging streetscape of either Ethelbert or Ringers Rds or the High St.

3.5.7 A suggested approach to an Opportunities and Constraints plan at the site and urban block level is provided at fig 3.15 (previous page) and at a large scale in Appendix section 1.0.

3.6 Nearby Sites' Applications and Approvals

3.6.1 Bromley Council has recognised the pressure for housing and other uses in the town centre and specifically identified development locations, including the appeal site which sits in SA 10. Meanwhile, other sites nearby have achieved planning permission or are being developed. Some, like the Churchill Gardens site opposite the appeal site to the north, have been explored and shelved pending further action. There is no current proposal for this site, however other developments are progressing.

3.6.2 The projects of most relevance to this appeal are those close to the appeal site and within Site Allocation 10, notably the first 3 bullets, although those further afield are also of interest (see map opposite, fig 3.17 for locations):

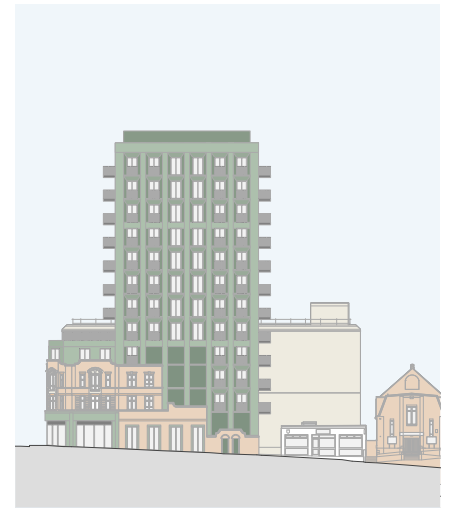
- **1)** Churchill Gardens (to the north of the appeal site, withdrawn application) - this was a highly ambitious scheme, a joint venture between the Council and private developer utilising land between Ethelbert Rd and the Churchill Theatre to create a series of tall buildings set around a central public open space which further connected to the Churchill theatre entrance and created new public realm and pedestrian connections both north-south and east-west into the local Park and Gardens;
- **2)** 66-70 High St - Permission achieved at appeal for this scheme on the corner of Ethelbert Rd for a single 12 storey residential block over retail at ground level, including retaining part of the existing character building. It is the closest development to the appeal site and its scale, form and site placement needs to be taken into account in relation to the appeal site.
- **3)** 62 High St - Permission achieved to add three storeys to an existing 3 storey character building, creating 5 levels of residential use over one of retail at ground level. This site is on the south corner of Ringers rd, adjacent to the existing 10 storey Henry House and opposite the TKmaxx building (which is 4 commercial storeys, not dissimilar to the final height of no.62 opposite at 6 mostly residential storeys). The new floors have setbacks from the main building at various levels.
- **4)** Beyond SA 10 on town centre hillside slopes: Elmfield Rd Projects - This area is located on the east side of the High St, 2 blocks back from the central spine, where both existing and new buildings are a mix of office and residential use. Older office buildings (10-12 storeys) step up from the High St (one block back), then newer projects (Wells, Prospects and Devonshire Houses) step down (4-10 storeys) in height from these office buildings to their west, creating a transition towards the lower residential housing beyond the highway structure (as should new buildings to the west of the High St), following the 'hill town' principles as set out earlier in this proof and in the SPD.



Fig. 3.18 High St elevation of approved proposal for 62 High St, showing its relationship, across Ringers Rd to the TKmaxx building and to the taller Henry House behind. The appeal proposal would rise above the TKmaxx building but not higher than Henry House behind (following the pattern of lower buildings on the high St and taller behind or set back. All the additional floors to 62 High St are set back from the two street frontages to reduce visual impact. NTS



High Street elevation.



Ethelbert Road elevation.

Fig. 3.19 Street and context elevations for 66-70 High St, the 12 storey building which was successful at appeal. No. 62 High St is on the left of this streetscene without its extension, which is shown in the drawings above at fig 3.18 NTS

3.6.3 Located outside SA 10 and on the lower, relatively flat land below the High St and station, the Bromley South area includes a number of tall buildings, both built and consented. Their arrangement and townscape relationship to each other is slowly forming a clearer cluster, with their non-orthogonal forms arising from the context and urban layout - as a result of the complex highway layout, non-orthogonal site boundaries and constrained site arrangements in this location.

3.6.4 The tall buildings of Bromley South are not seen as precedents for development on SA 10, as the location of this area, its character, land form, street layout, context and adjacencies are all completely different to that of Bromley West. Bromley South also has its own Site Allocation.



Fig. 4.1 Architect's render, Birdseye view looking north-east, including the urban block area covered by Site Allocation 10, but excluding the consented 66-70 High St building. This still expresses the overheight nature of the proposal in relation to stepping down to the existing housing at lower levels.



Fig. 4.2 View to the junction of High St with Ringers Rd showing the existing building at 66-70 High St, outside the conservation area but adding to character and identity of the town centre. This corner location is an appropriate location to establish identity for wayfinding - at the entrance to both the side street and to the High St's main shopping and historic area, not the appeal site.

4

Design Appraisal

4.1 Introduction

4.1.1 This appraisal will address the issues in Reasons nos.3, 4 and 5 (4 & 5 partially only, insofar as these relate to design) as set out in full in Section 2.0 of this proof, as well as our SoC. Reasons 4 & 5 will also be addressed by my colleagues, Daylight and Sunlight witness Dan Wade, Heritage Witness Dorian Crone and Karen Daye, planning witness.

4.1.2 It is accepted that the policy context establishes the appeal site as an appropriate location for development, as part of the wider SA10 development site, however with some clear cautions about sensitivity to the adjacent housing, other potential development sites and building heights overall.

4.1.3 The following sections set out an assessment of the appeal proposal using relevant headings from the NDG, most particularly: *Character & Identity, Built Form, Movement, Nature and Public Spaces and Uses.*

4.2 Context, Character & Identity

4.2.1 While this site is included in SA10, the design coming forward on this relatively small part of this urban block, in itself a small part of the overall SA10 (see fig 4.1 opposite), needs to respond to the character of the existing context as well as allow for the potential future development on adjacent and nearby blocks.

4.2.2 The appeal site is located mid-block along its two frontages. It is not on the High St, nor is it on a junction or intersection which requires identification for wayfinding purposes, nor does it contain important civic or community uses which would justify a particularly tall building. Both the buildings forming the appeal proposal are primarily residential in use, therefore they require clearly located and accessible front doors and a sense of welcoming to their residents, however they do not perform a wider civic or community role in the area.

4.2.3 The nearby consented 12 storey building at 66-70 High St is almost as tall as the Churchill Theatre and Library, although it has a much smaller footprint, which reduces its visual competitiveness in relation to this important civic structure. This building is located on a site on the corner of Ethelbert Rd and The High St (although it is set back from the street frontage in the SPD tradition), it also identifies the southern entrance into the pedestrianised section of the High St and the start of the Conservation Area - appropriately considering the retention of the character building to its base.

4.2.4 Considering this building's location and role, there is no further townscape opportunity for a particularly tall building on the Ringers Rd/Ethelbert Rd urban block, and it is important that as the SA10 area develops out, the buildings proposed form an integrated whole and a sense of coherence, working together to create a coherent neighbourhood while bringing comfortable higher density living and more homes to the town centre.

4.2.5 Para 3.9 of the SPD states that "The change in topography is a key characteristic of the town centre which will influence the layout, height, scale and massing of future development."

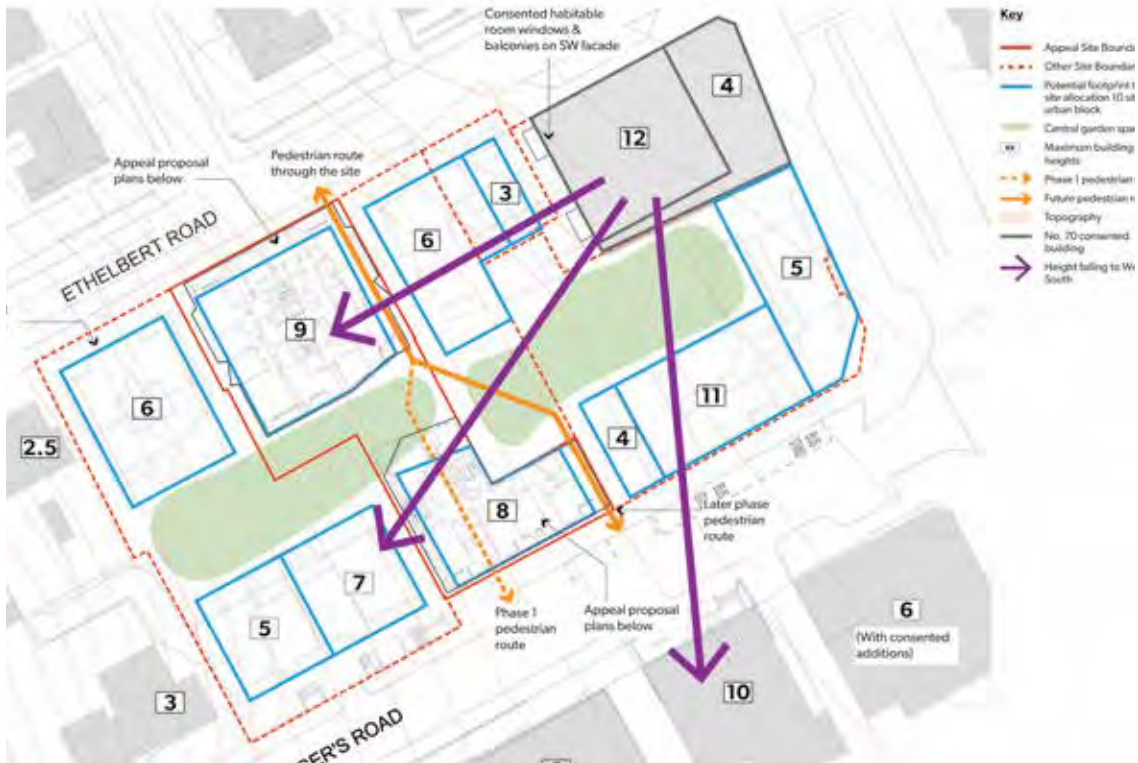


Fig. 4.3 Potential approach to wider site masterplan showing heights of buildings stepping down the hill. See Appendix section 3.0 for larger scale diagram.



Fig. 4.4 Part plan (by Hollaway Architects Drwg no. 100.10) showing distances between appeal proposal building Block A and site boundaries as well as to immediately adjacent buildings and parts of Block B. The proposed building (Block A) includes windows on several boundaries to adjacent sites.

4.2.6 As out in the SPD, the urban form and townscape on this site should enhance the established townscape character of the town centre and respond to the principles of the natural topography, ensuring that building heights reinforce the existing local character (while creating coherent and integrated new developments in site allocation areas) and the primacy of the Churchill Theatre and Library on the upper plateau and stepping down to the 2 & 3 storey housing below.

4.2.7 Most specifically on the appeal site, Block A (on Ringers Rd) should be no higher than Block B (on Ethelbert Rd), which in turn should be lower than 66-70 High St, with allowance for a lower or intermediate height of building on the Salvation Army site between them, depending on site capacity and design. See ARU drawing, Potential Masterplan Approach fig 4.3 opposite and in Appendix 3.0, showing possible heights that could be achieved to reflect this principle.

4.2.8 This approach is based on looking forward to and accommodating future development as well as respecting the buildings and uses that currently exist on adjacent sites.

4.2.9 Building character also contributes to identity and the appeal proposal consists of 2 contemporary brick buildings which could provide a sense of style and differentiate themselves from, for instance, the existing William and Henry Houses in Ringers Rd. However, the proposal does not enhance the existing character of the High St and adjacent Conservation Area (which nos 62 and 70 High St do with their retained historic building features) and is likely to cause harm to this with overscale form and massing.

4.2.10 A sense of identity is important to people who live and use buildings but this would be provided by the ground floor uses and design approach to lower floors and entrances. Height is not a necessary component of creating identity, whereas high quality architecture along with active and identifiable ground floor uses, which form some continuity with those on the High St would strongly contribute to identity in a way that would support both the residents and the local community.

4.2.11 A proposal for this site should aim to set the standard for a coherent future development on the balance of the urban block (SA10 section) in terms of character, identity and quality.

4.3 Layout & Siting

4.3.1 The appeal site is formed by land assembly of 2 or 3 existing sites backing onto each other with 2 street frontages. The resulting format is a 'cranked' site, relatively narrow to its centre and located in the centre of the overall urban block, where the sites to either side are also identified for potential redevelopment. The land also is on a significant slope, falling in 2 directions, steeply to the west across its short section and to a minor degree north-south on its long section.

4.3.2 The proposed layout of 2 separate buildings, each with a street frontage entrance, with a central shared courtyard garden and potential pedestrian access from street to street, is a valid approach in principle, as well as responding to the shape of the resulting development site.

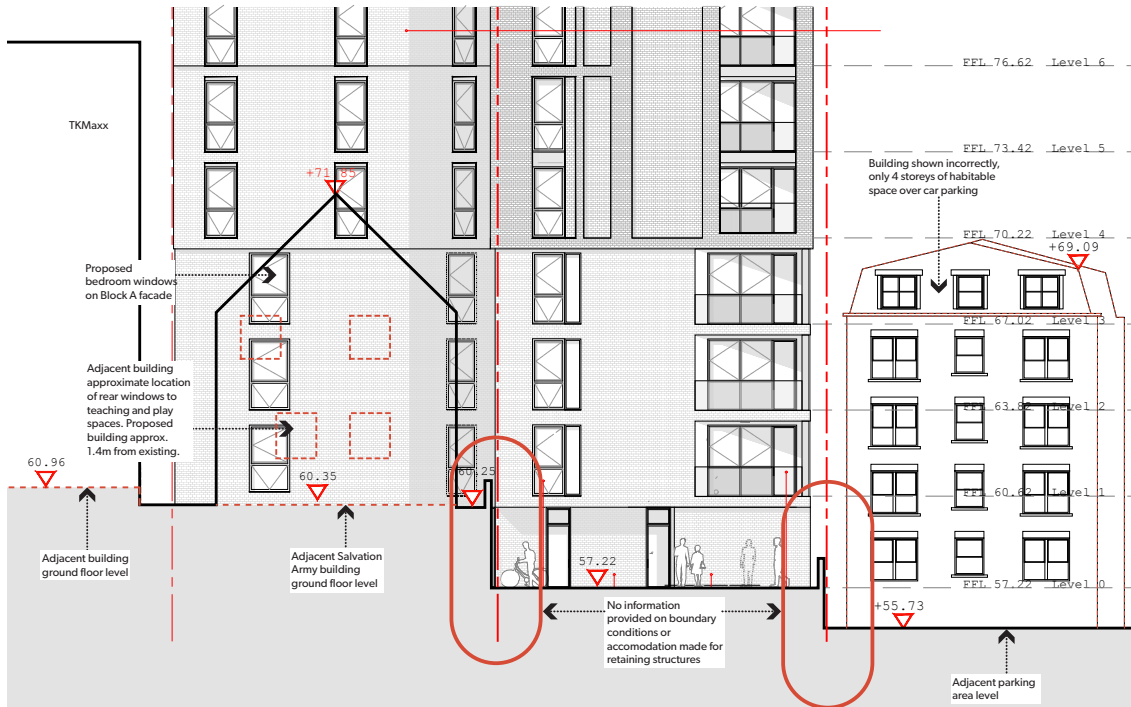


Fig. 4.5 Annotated cross-section through courtyard showing added existing windows (Salvation Army building) and proposed windows (Block A), as well as boundary issues. See Appendix Section 4.0 for larger scale and notes. All levels data from Hollaway Architects' topo plan no. 100.01

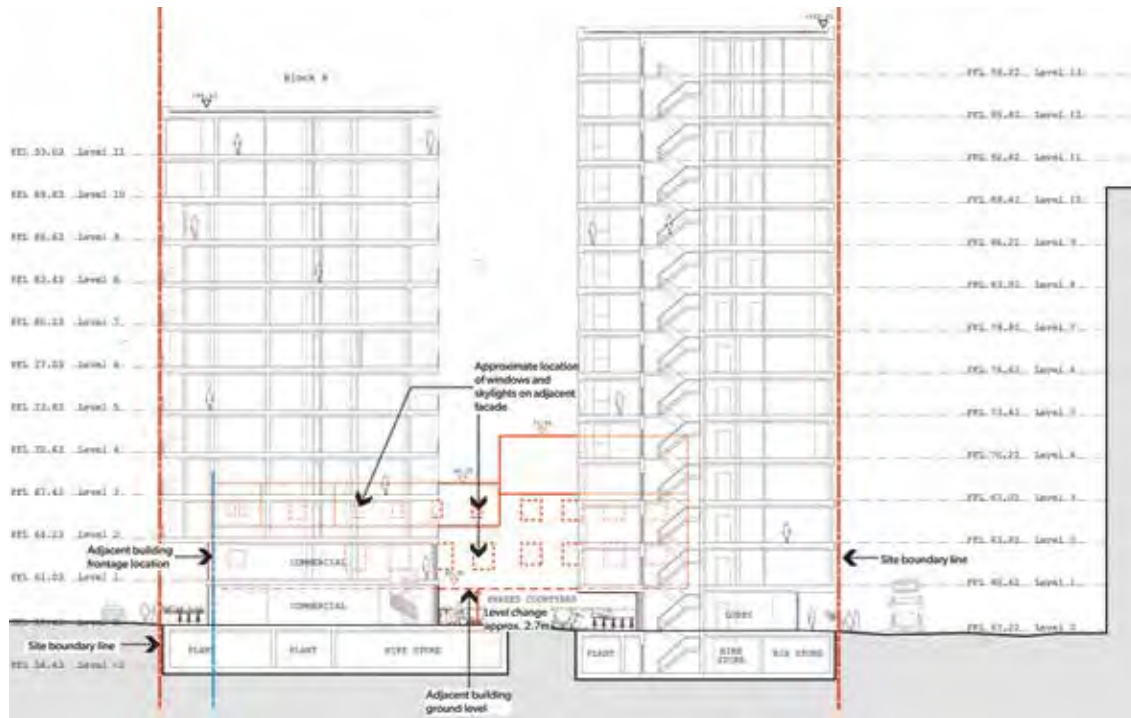


Fig. 4.6 Annotated long section through courtyard and proposed buildings showing their proximity and the adjacent Salvation Army building (added by AR) showing approximate location of windows, most of which will be obscured (as shown) by the appeal proposal, also showing the level change at the boundary between the appeal proposal and existing buildings. See Appendix section 4.0 for larger scale and notes.

4.3.3 However, the layout shows Block A (on Ringers Rd) almost filling the site, boundary to boundary across the street frontage, very close to existing buildings in both directions and including windows from habitable rooms looking on to the boundaries into adjacent sites. The apartment block to the west of Block A also has existing windows onto the boundary. The proposed siting and layout of the appeal proposal ensures that any future redevelopment of the adjacent sites will necessarily need to be set further away from side boundaries, thus reducing their potential footprint and viability, while the appeal proposal maximises that on the appeal site by building to the boundaries.

4.3.4 The windows to habitable rooms which are proposed within Block A on or close to three boundaries are also very close to existing adjacent buildings (approximately 1.2m in the case of the TKMaxx building and slightly larger in relation to the Salvation Army building and apartment block to the west - see fig.4.4, part of a dimensioned plan by Hollaway architects (Drwg no. 100.10). This siting for the proposed Block A could be creating daylight access problems for both the existing building and for lower floors of the proposed development (see larger scale sections, Appendix 4.0).

4.3.5 The siting of Block B is also very close to boundaries and adjacent buildings, with several habitable rooms needing natural light along the length of the boundary. This is dealt with by providing sharply angled projecting windows - almost to the boundary lines, thus limiting views towards the adjacent sites as well as limiting the light into these spaces (living rooms and bedrooms).

4.3.6 Both blocks' siting militates against any public access through the site outside of the buildings themselves, as there is no space left to accommodate movement between building and boundary. The proposal does show public pedestrian access through both building foyers (addressed in following section, Movement).

4.3.7 Adjacent buildings of various forms and uses are located close to all the site's side boundaries and while some record has been made of existing levels on a basic topo plan (Drwg no 100.01 and CD 1.2), no initial cross-sections were provided across the site showing adjacent levels or those of adjacent buildings. Cross-sections were requested and initially refused, however eventually provided very late in the process and they subsequently prove to have missing and incorrect information, see Annotated sections in Appendix Section 4.0.

4.3.8 In an attempt to understand the potential relationship between the appeal proposal buildings and their neighbours, I produced annotated drawings prior to the latest sections being issued, based on available information from the architects, including their topography plan, as opposite figs 4.5 & 4.6 and Appendix section 4.0.

4.3.9 These sections show areas where existing windows will be built across or built very close to and where the proposal itself will have windows to bedrooms (Block A bedrooms in flats on lowest 3 floors) looking out onto an existing wall - the Salvation Army block is shown (fig 4.4) by the architects themselves to be approximately 1.4m from the proposed new Block A. Larger scale drawings in Appendix section 4.0.

4.3.10 While the Salvation Army building is not a residential building, its internal spaces are used for a range of activities including children's play, teaching and music practice/performance, all of which benefit from natural daylight, a large amount of which will be lost to many of their spaces.

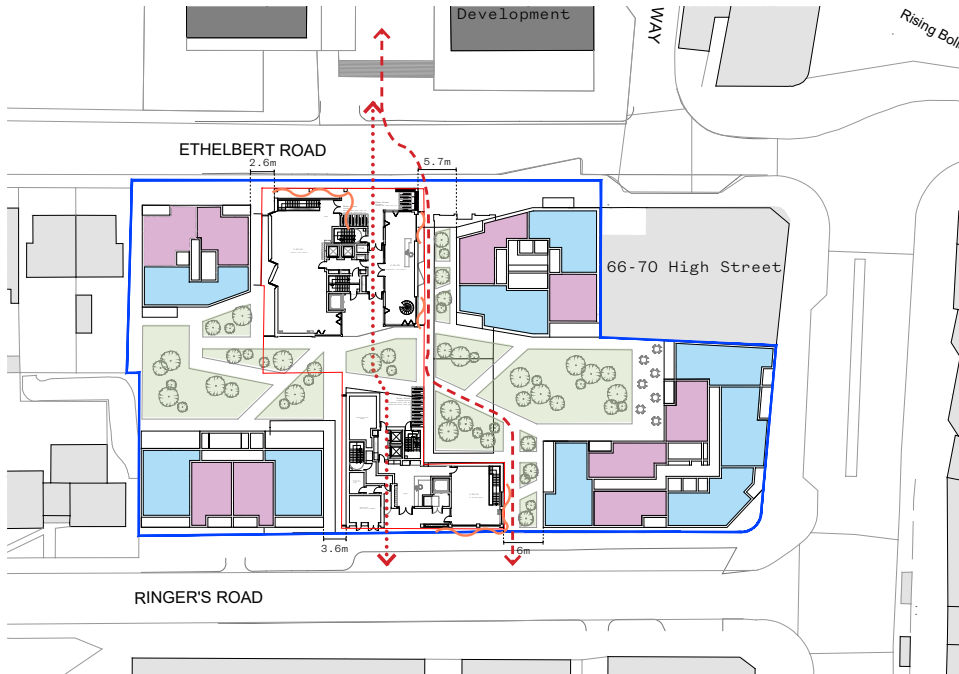


Fig. 4.7 DAS p.9 Future Masterplan showing proposed route through buildings, dotted arrow (incorrectly drawn- see annotated plan fig.4.7 below) and potential future route (dashed arrow), located fully outside the appeal site.

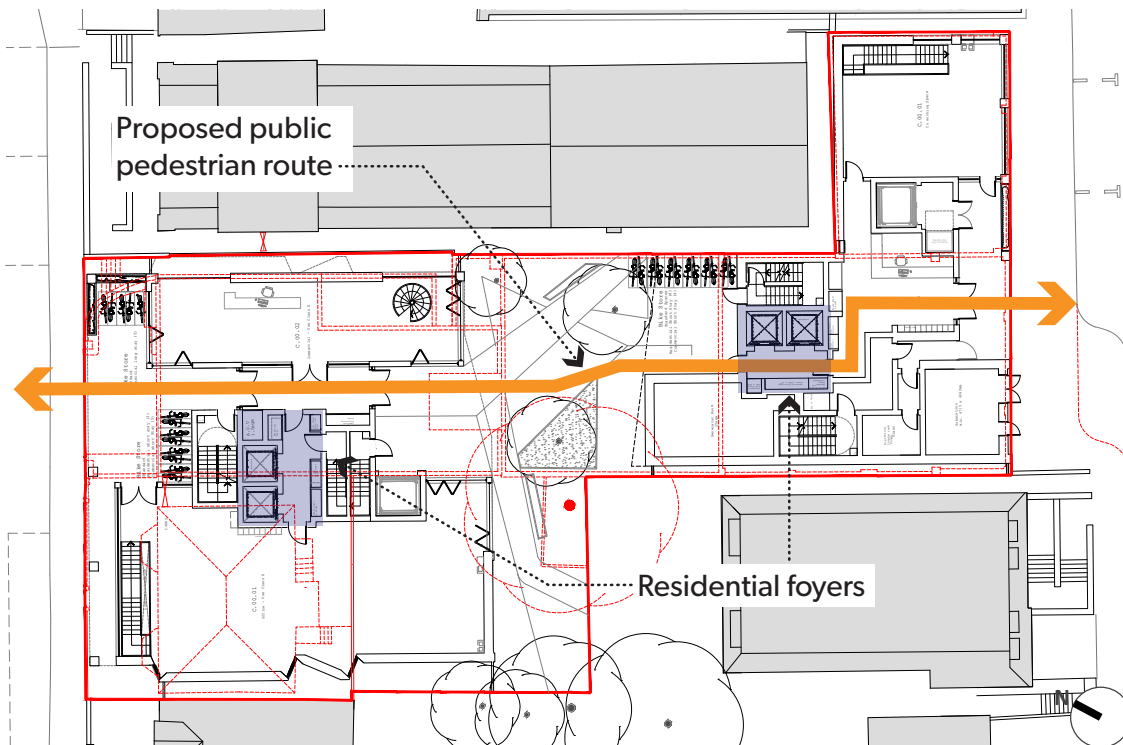


Fig. 4.8 Appeal proposal Site plan with annotations (by AR). Orange arrow shows proposed pedestrian link through both buildings, including the 'kink' in Block A (on the right) and both residential foyers shaded to identify location. The section of the link through Block A does not support public use with a lack of clear view between courtyard and street and access through the residents' foyer.

4.3.11 In addition to compromising window outlook and light access, the appeal proposal is also set very close to an existing residential building, 6 Ringers Rd, and will have potential overlooking impacts on the flats in this building. Block B is located approximately 14.3m (window to window) and approximately 12.6m (window to balcony) from habitable rooms in this building and while that may be an acceptable back-to-back distance between 3 or 4 storey buildings, an existing 4 storey building overlooked by new 12 or 14 storey buildings with multiple windows and balconies will experience a strong sense of overbearing and this proximity should be mitigated.

4.3.12 In addition to this, it will be possible and likely for users of the triangular corner Block A balconies to overlook the habitable rooms of 6 Ringers Rd from as little as 5.0m away - looking obliquely south-west back to the existing flats.

4.3.13 The layout and siting issues also include the proximity of the buildings to each other, with habitable rooms and balconies between the blocks, looking across the central courtyard set between 9.0-10.5m apart. Again, this may be acceptable in lower height buildings or in situations like mews houses, but between 2 significantly tall buildings, this compromise in living conditions does not seem to be offering a high quality living environment to the potential residents.

4.3.14 Overall the proposed layout on this site shows no apparent consideration of the impact of the development on daylight access into spaces of the Salvation Army and other adjacent buildings; nor the potential future development of adjacent sites.

4.3.15 The sloping site and context seems to be inadequately considered by the proposed site layout and drawings, except where the buildings meet both the streets. The drawings do not show an awareness of adjacent ground or floor levels or how the proposed development will impact these, let alone in terms of a future development connecting to other sites.

4.4 Movement

4.4.1 The appeal proposal responds to the SPD 'desirable pedestrian links' drawing, as shown on the Church House sub-character diagram fig.3.14, which shows a link between Ethelbert and Ringers Rds. This link could also connect through a future Churchill Gardens site development as well as further links southwards, to provide an alternative pedestrian route to Bromley South station and improved access to the park and gardens for the wider area.

4.4.2 However, because of the proposed layout which shows buildings almost completely filling the street frontages of the sites, boundary to boundary, the 'public route' is shown traversing through both buildings. A public route from Ethelbert Rd outside the proposed building could potentially be provided by setting Block B further away from the north-eastern boundary, enough to provide access, and an external link would be the most desirable to attract public use.

4.4.3 A route in this position could potentially be widened in the future and lead into a larger central green space if/when the adjacent sites are redeveloped and it would seem to be a reasonable expectation that all developments take some responsibility for accommodating a publicly accessible link through the sites.

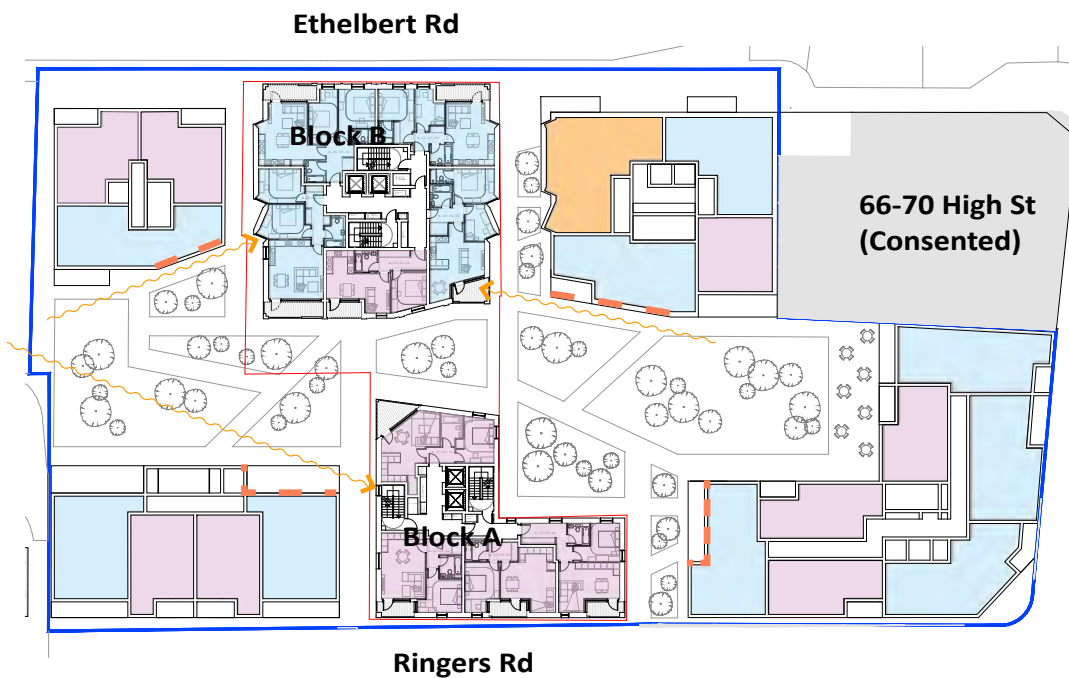


Fig. 4.9 DAS Addendum p.10 Future Masterplan showing potential development on the balance of the SA10 site included within the defined urban block between Ringers and Ethelbert Rds. Labels added by AR. It is worth noting that both the boundaries and consented footprint of no.66-70 High St are shown incorrectly. See Appendix section 3.0 for larger scale plan and alternative approach.



Fig. 4.10 VuCity View p.23 showing the proposal Block B set forward to the back of pavement boundary edge. This increases the block's sense of scale and overbearing on the street and buildings below. This view also shows both Blocks A&B and 66- 70 High St coalescing visually into a much larger bulk, although the appeal scheme's forward projection emphasises its excessive scale, with its top disappearing off the image.

4.4.4 However, internal access through Block B on Ethelbert Rd could potentially be acceptable in functional terms because the central foyer also provides access to other uses, it provides a visually direct connection into the central courtyard and does not compromise the security of the residential foyer .

4.4.5 Block A is a more challenging issue as the site is an 'L' shape making a continuous connection through the courtyard from Block B towards the street more difficult (either outside the building or within it).

4.4.6 An internal route could be satisfactorily created if it also followed the same principles as those for Block B, however that shown in the appeal proposal is convoluted; it has no direct visual connection between the footpath and the central courtyard; it is not obviously accessible to the public; and, it includes going through the residential foyer, which compromises the security of this space. See plan fig.4.8 previous page.

4.4.7 Because the current proposed route takes the public through the centre (rather than one side) of the communal courtyard space between Blocks A & B, it renders this small space even harder to use as an attractive amenity space by the residents, especially its elements of children's play.

4.4.8 The masterplan by the Appellants for the wider area (see fig 4.7 previous page from DAS Addendum p.9) shows a future pedestrian link outside the buildings, but entirely on neighbouring sites, therefore not genuinely part of this proposal and pushing all the potential 'public benefit' costs onto future development projects, while also reducing their buildings' potential footprint sizes.

4.4.9 In terms of pedestrian movement to the development on public streets, while the footpath and external access on Ringers Rd is relatively generous, the footpath on Ethelbert Rd is narrower. The existing building on the site is set further back from the boundary and footpath, with vehicle and other access to the front of it. The appeal proposal by contrast, shows Block B pushed forward to edge of the street boundary (back of pavement), squeezing pedestrians, projecting forward of any other building in the street and becoming more overbearing to the street view, the wider view and to the neighbours down the hill. See fig.4.10 opposite.

4.4.10 Existing buildings along Ethelbert Rd are all set back along a similar line, including houses with private front gardens and including 66-70 High St on the corner. This visual (and physical) width creates a more generous sense of space to the street, increases usable public realm along this section of the street and encourages comfortable pedestrian movement along Ethelbert Rd. While the ground floor of Block B shows some areas of setback and a wider entrance area, this does not contribute directly to pavement width nor make up for the overbearing quality of the building above.

4.4.11 Good cycle storage is provided and car parking is only available on the street, appropriately for a town centre development.



Fig. 4.11 Architect's VuCity View 9 showing the existing William House and Henry House buildings (to the right); consented 66-70 High St building (partly hidden) and the two appeal scheme proposals in front of 66-70. They are set down the hill from the High St yet Block A is seen as taller as well as both coalescing visually with the consented building. whereas they should be stepping down the hill in both absolute and relative height.



Fig. 4.12 Appellant's proof Vol II RVIS p.13 A birds-eye view of the appeal proposal showing both blocks coalescing in view to seem to be a single structure. Relationship to 66-70 High St shows this and Block B to be the same height (Block A is 2 storeys higher at 14 storeys, too high on a non-marker building site) whereas they should be stepping down the hill in both absolute and relative height.

4.5 Built Form - Height, Scale & Massing

Height

4.5.1 Both the London Plan and Bromley's TC SPD agree that new development should 'optimise' not 'maximise' new development on urban sites. Guidance Note 10 of the SPD says (my bold) that "Development proposals should seek to **optimise** site capacity ensuring that development is of the most appropriate form and land use for the site, **responding to context and capacity for growth**, with a **focus on quality of place over quantum of development**."

4.5.2 The appeal proposal proposes both footprint up to or very close to all boundaries as well as excessive heights for this context. The taller building Block A would be the tallest in absolute terms in the town centre and the views produced show that while in datum terms it may not be taller than the Churchill Theatre and Library building, it is a visual comparator to this distinguished landmark.

4.5.3 In addition this building is taller in floor level terms than the recently consented 66-70 High St. This latter building performs a specific role in providing identity and wayfinding location to the southern termination (or entrance) to the 'top plateau' and main shopping area of the High St. This High St project also retains and enhances a character building frontage at the edge of the TC conservation area, enhancing the High St's existing character, while stepping back from the street edge in compliance with the established form of High St development.

4.5.4 The appeal proposal buildings have no justification for their proposed height, while their proximity to each other (as little as 8-10 m at their closest), exacerbated by their height and creating a visual coalescence from many views outside the sites. The coalescence increases the sense of scale and the sense of overbearing to close neighbours, particularly in the housing further down the hill, as the topography also increases the proposals' relative height.

4.5.5 The buildings' proximity to each other, along with their overscale heights, also adds to overshadowing of the proposed central courtyard, reducing its attractiveness and usability, while also creating a sense of overlooking from the proposed balconies onto this amenity space.

4.5.6 The appeal proposal also fails to satisfactorily explore potential heights for a wider masterplan of the urban block, nor look at a 3D relationship of these future developments in the context of this proposal to explain how it would fit holistically within the wider block as phases are developed, as required by the SPD.

4.5.7 The proposed heights are a major contributory factor in the appeal proposal representing overdevelopment of the site, demonstrating maximisation rather than optimisation of the site, with no apparent balancing benefits to the public realm or in other areas. Locating the taller building on the south of the site also further exacerbates the failure to follow the topography down the hill.

4.5.8 The proposed building heights do not create a transition towards the 2-3 storey houses lower down the hill, instead presenting overbearing forms to their much smaller neighbours. This is also a result of overdevelopment of the site.



Fig. 4.13 Heights plan of part of town centre including the appeal site, the balance of the urban block within SA10 and further parts of SA10 to the south of the appeal site.

The Courtyard has been designed as a part of the Future Masterplan but also able to work and add value independently.

The pedestrian connection between Block A and Block B is proposed to reflect the materiality of the buildings, making it clear this is private access.

The proposed planting species for the beds have been selected to withstand the shadow from the buildings, as well as taking visual cues from the understorey planting from the forests. This will be further complimented with a water rill. The sound of moving water will therefore add to the calming feel of the space.

Whilst the Courtyard will be enclosed by temporary fencing, two sections will be fitted with temporary planter boxes which residents could have once the fencing is removed.

TEMPORARY FEATURES

TEMPORARY FENCE WITH PLANTER BOXES



Fig. 4.14 Landscape plan from the DAS Addendum, p.56. The landscape information leads to some confusion about the 'public' route through the buildings, as this does not seem to go through Block A. Also, the landscape designers do not seem to appreciate that there is a 2.7m height difference between the appeal site and the adjacent Salvation Army site, with no proposals for dealing with retaining and no approach to level changes (stepping, ramping, walls etc) shown in the future landscape approach for ongoing development.

Scale and Massing

4.5.9 As pointed out in earlier sections, the appeal proposal buildings are shown filling the site as close to its boundaries as conceivably possible, see plans. The footprint of Block B is larger than, for instance, that of its consented neighbour at 66-70 High St (on a similar sized site), as well its proposed scale and location forcing other potential adjacent developments to reduce their footprints in response to the massing - as shown in fig.4.9 opposite, DAS Addendum p.10, the 'Future Masterplan'.

4.5.10 The decision to push proposed Block B forward to the footpath edge is an assertive statement which emphasises and maximises the overscale mass of the proposal block (see also VuCity view previous page fig 4.11) and clearly expresses overdevelopment. This also removes the opportunity to create useful and attractive public realm at the entrance to this building, as well as to provide a genuine public benefit to balance the scale and form of the proposal to a small extent.

4.5.11 It is interesting to note that the 'Future Masterplan' (fig 4.9) shows the other potential developments on Ethelbert Rd to be set back in line with 66-70 High St, while just the appeal scheme is pushed forward to the pavement, emphasising its larger massing and setting it apart from its neighbours.

4.5.12 Figs. 4.11, 4.12 (previous page) and 4.13 opposite show the uncomfortable relationship of Blocks A & B, 66-70 High St and Henry House in terms of heights (and bulk). The appeal buildings should visually step down the hill to the west and the south, while 66-70 should clearly be taller than both Blocks A & B, in order to create a transition down the slope and because it is the wayfinding marker and identity building for the conservation area and main shopping area. The appeal blocks are clearly very close together in the 4.11 view, emphasising the overdevelopment massing on a small site.

4.5.13 The resulting appeal proposal is too large in footprint terms for the site, as well as too tall in its context, creating a larger mass which represents overdevelopment. A proposal for this site should aim to set the standard for a coherent development on the balance of the urban block (SA10 section) in terms of scale, form, character and quality, rather than dominating the context as shown.

4.6 Nature, Landscape, Open Spaces & Public Spaces

4.6.1 The appeal site is located close to Church House Gardens and Bromley Park, where these major green spaces provide nature, landscape and recreation space mostly suitable for older children and adults. Considering the quantum of residential flats, more attractive and usable space is needed in this project, especially for doorstep and structured play for younger children.

4.6.2 The small central courtyard between the buildings works very hard, multi-tasking for every environmental and open space requirement. However it may not be suitable for small children's play because of its small size and the other proposed uses including the provision of public access through its centre between the buildings; the courtyard includes cycle storage and has several commercial uses opening onto the space, hence compromising any potential sense of residential 'ownership'.



Fig. 4.15 The rendered image on the front cover of the DAS Addendum showing the limited public space made available on the Ethelbert Rd frontage, almost none of this is green. Two people are shown standing in the parking area as the narrow footpath leaves little room for social space.

We have rearranged the ground floors to give a better active frontage to Ringers Rd, by introducing a co-working space on the SE corner. This will be double height to the basement with a lightwell and the glazed frontage will return along the side to improve the frontage for the future masterplan.

This provides Block A with similar aesthetics to the active frontage proposed at Block B



Block A - Previous Street Facing Elevation



Block A - Revised Street Facing Elevation

Fig. 4.16 DAS Addendum p.4 showing the change to ground floor frontage to Block A, to incorporate work space use active frontage adjacent to the entrance area. This does improve the quantum of non-residential use.

4.6.3 The 2 appeal blocks are very close together (under 10.0m apart above ground level) and Block A sits on the south-east side of much of the central courtyard, shading much of the space through the morning and middle of the day, making it an afternoon/evening space in terms of maximising sunlight. This is less ideal for children's play than it is for adults.

4.6.4 The landscape designers have worked hard to introduce green into the small area of open space, but are restricted to the area not overhung by the rest of the building (see dashed lines on plan previous page, fig 4.14). All existing trees will be removed from the site, although the gardens to the west currently include mature trees and a strong green element, these are not within the control of this project.

4.6.5 There is little information to suggest that the landscape designers understand the essentially sloping site and the inevitable need for retaining structures (and future transition elements for movement routes) within the open area between the buildings, particularly to the north-east. The adjacent building (Salvation Army) sits close to the boundary and approximately 2.7m (ground floor level, from Architects' topo information) above the proposed level courtyard area. This existing building will require a retaining structure within the boundary of the appeal proposal, which is highly likely to reduce the usable area of courtyard open space.

4.6.6 This will impact on urban greening and area calculations, as well as impact on any future links between developments. The drawings provided do not show any understanding of the slope and level changes inherent to this site and neighbourhood.

4.6.7 There is very little *public* space (or other physical public benefits) proposed in the appeal scheme, with built form proposed up to the back of pavement on both frontages, leaving little space available for planting or other treatments. The proposed building entries on both streets have open, covered areas inset to the building, but these are simply external entrance spaces rather than public space with wider uses, planting or 'dwell opportunities'. the 'public' route through the site is hard to find and has limited legibility.

4.6.8 While public realm and public open space is not the only public benefit possible through a development scheme, it is often the most obvious and of clear benefit to the wider area. The Design Review Panel (DRP) Report (CD 3.1) noted that "Any development of this scale could only be supported if the public benefits are substantial" para 1.5.

4.7 Uses

4.7.1 It is appropriate for the appeal proposal to have residential uses above the ground level in both buildings (affordable housing will be addressed by other witnesses), however the overall quantum of residential, in two over-scaled buildings on a small, constrained site, is too great, creating overdevelopment.

4.7.2 Because of the proximity to the High St and footfall along both streets it is also important the ground floor spaces provide for daytime uses with active frontages and entrances relating to both the streets.

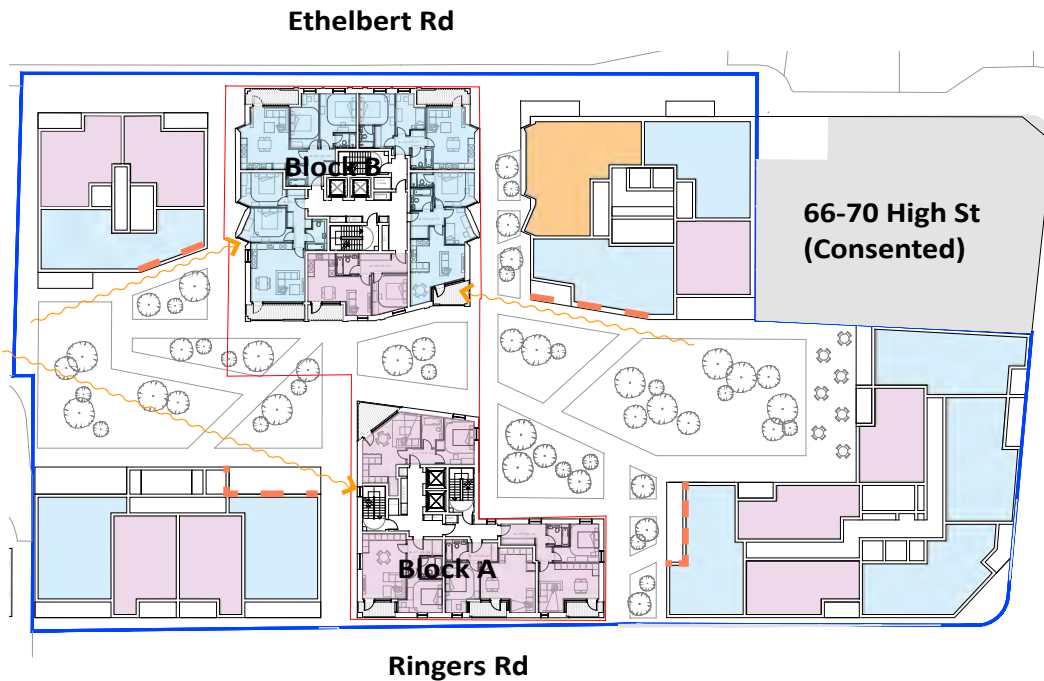


Fig. 4.17 DAS Addendum p.10 Future Masterplan showing potential development on the balance of the SA10 site included within the defined urban block between Ringers and Ethelbert Rds. Labels added by AR. It is worth noting that both the boundaries and consented footprint of no.66-70 High St are shown incorrectly. See Appendix section 3.0



Fig. 4.18 DAS p.59 The landscape architect's design approach for the overall development of the balance of the urban block. As well as not reflecting the correct boundary locations around 66-70 High St (as with the architects), this does not take into account the level changes, in particular those between the appeal site and the adjacent Salvation Army site to the site's north-east.

4.7.3 Both buildings appear to now include workspace and/or food and beverage uses at the ground floor (partly provided in response to the DRP report), however to describe these as ‘community uses’ implies that they are within the control of the building residents, whereas the more likely reality is that they are commercial uses which the community may use.

4.7.4 Because of the scale and footprint size of the two blocks, the central courtyard amenity space is minimal and highly overlooked and overshadowed for part of the day by the blocks themselves. This space is also shown to be used for public access through the block, in accordance with the SPD which asks for improved connections through this block. Because of the buildings’ footprint size this use must link through the buildings themselves as well as through the communal amenity space, compromising both these locations.

4.8 Potential Future Masterplan

4.8.1 The appellant’s proposed masterplan (DAS pp.9 & 10 and opposite fig.4.17) for the wider urban block area includes incorrect boundary data to 66-70 High St and the TKMaxx site, nor does it show the 66-70 High St consented scheme building footprint. The suggested scheme on the Salvation Army site is not possible to the extent shown, if correct boundary data is shown. See Appendix Section 3.0 for larger scale and proposed alternative approach.

4.8.2 The masterplan shown does not include suggested heights of buildings other than those forming the appeal proposal, nor does it look at a possible 3D model of the future scheme to explore the wider impacts. There is no suggestion of a phased development approach to the balance of the urban block.

4.8.3 The proposed wider masterplan shows no discernible appreciation shown of the sloping ground levels in this plan, particularly the significant drop at the boundary of the appeal site and the Salvation Army site, where there will be some difficulty in making an accessible link between sites in a future redevelopment. This is shown in the landscape architect’s future masterplan concept (DAS p.59 and fig 4.18 opposite) where a path crosses this boundary with no reference to or clear understanding of the levels.

4.8.4 The masterplan also shows Block B built forward to the pavement edge on Ethelbert Rd (as discussed in previous sections this proof) while all other possible development buildings are shown set back in line with 66-70 High St. The appeal scheme is designed close to or on its boundaries, necessarily reducing footprint sizes of its neighbours, while an external public access route is also located on adjacent sites to remove this public benefit from the appeal site.

4.8.5 The appellants were encouraged by the DRP to produce a “clear masterplan for this urban block... showing change over time, providing context...” (para 1.7). This would include showing credible footprint sizes and heights for other blocks and some appreciation of the topography informing a future coherent landscape concept.



Fig. 4.19 Looking north along Ravensbourne Rd from the bottom of Ringers Rd. Most housing is older 2-2.5 storeys high with some more recent blocks of 3 storey flats (see rendered image below).



Fig. 4.20 Rendered image from Architect's views document Volume II RVIS 7. View from a similar position to that of the photograph above (see cycle route sign), looking directly up Ringers Rd and showing the overscale height of Block A (66-70 High St to the rear) in relation to William House across the street and the existing 3 & 4 storey blocks of flats stepping down the hillside. Not a sympathetic transition.

4.9 Design South East Review Panel (DRP) Comments

4.9.1 The proposal was presented to a Design South East Review Panel in April 2021 (I was a member of the panel, but not the author of the report) and the panel made specific and strongly worded comments about the proposed building heights (the project “requires a fundamental rethink” Summary para), scale, residential context, adjacent buildings/uses and communal amenities, as summarised below:

- **“Reconsider the height and scale** whilst providing a narrative for a tall residential building.
- **Study the topography** and residential context further to assist with a **sensitive transition** from commercial high street uses towards residential uses.
- **Consider changing scenarios** over time in context of **future masterplan** and allow for development options.
- Produce an **environmental strategy** and ensure sustainability principles are embedded in the design proposals.
- Create a **community or civic offer** at ground floor level.
- Introduce **generous communal and play spaces** - enable people to meet their neighbours and form a community.”

4.9.2 As a result of the review, the appellant’s design changes (DAS p.17) seem to only consider any changes to the ground floor uses. These were changed to provide better active frontage uses to both the courtyard edges and the street frontages, providing ‘community co-working spaces’ and a bicycle cafe. These could potentially be effective uses for the ground floor spaces, however they are not ‘community’ uses unless the space is controlled by the community and/or residents. The spaces may or may not be subsidised businesses but in the absence of information to the contrary, these are commercial spaces, which may support the community in a broad sense, but are not ‘community uses’ and definitely not civic uses.

4.9.3 The height and scale of the proposal buildings does not appear to have been addressed at all following the DRP, nor does a more sympathetic transition to either adjacent uses/buildings or to the housing (in height, scale or massing terms) further down and at the bottom of the hill.

4.9.4 The panel was clear about their concerns with the topography and lack of information about how this would be dealt with (“more analysis of the topography is required’ para 1.6) and the impacts on immediate neighbours, as well as the need for a “clear masterplan... showing change over time [and] providing context” para 1.7. In other words, a credible phasing plan for the wider area of the urban block within the SA10 area as well an understanding of the heights and forms that could be built on the balance of this area following the development of the appeal site.

4.9.5 The DRP points made were largely ignored by the appellants and there was no follow-up panel as requested by the Chair.

4.10 Greater London Assembly (GLA) Comments

4.10.1 The GLA submitted two planning reports the first on 4th April 2022 (CD 3.2) and, following some amendments to the scheme, the second on 18th December 2023 (CD 3.5).

4.10.2 The GLA concerns as expressed in both these reports agree with the Council's Reasons for Refusal and are summed up para. 48 of the December report stating "The proposal represents overdevelopment and would be contrary to London Plan Policy D3, as it is not Design-led; contrary to Policy D4 as it would not deliver good design; and contrary to Policy D9, as it would result in unacceptable visual impacts."

4.10.3 In terms of urban design (para.45) the GLA noted significant concerns about the restricted separation distance between the 2 proposed buildings, the proximity to the boundaries causing problems with window openings; residential quality in terms of privacy, daylight, overlooking, the overshadowed communal amenity space and the potential prejudice to development of adjacent sites.

4.10.4 Effectively the "design, layout, massing and density of the proposals suggest overdevelopment of the site" para.45 and both the GLA concerns and reports support the Council's general view of the proposal and Reasons for Refusal.

4.11 Summary of Appraisal Section in relation to RfR

4.11.1 The previous paragraphs in this section demonstrate that, as set out in the Reasons for Refusal, the appeal proposal does represent **clear overdevelopment** on a constrained urban site, with very few or no mitigating elements in terms of public benefits.

4.11.2 The layout, siting, height and massing of both buildings is overscaled for the context, leading to an **overbearing and overdominant** proposal which cannot be justified in terms of its location, as it does not sit at a nodal or marker location and does not provide an important community or civic function, nor enhance the nearby town centre and conservation area.

4.11.3 The height, mass and proximity of both buildings to each other emphasises the scale of the proposal adding a strong sense of overlooking to the west and **compromising living conditions for neighbouring residents** - both in existing blocks facing towards the new blocks and existing houses lower down the slope.

4.11.4 The proposed layout includes overfilling the site, with the blocks too close to all the boundaries, as well as too close to each other across the courtyard, **compromising the proposal's residential layout and amenity provision** and restricting the capacity for movement through the site. There are windows proposed on four boundaries around Block A boundaries, very close to existing buildings and windows and also **constraining future development** of adjacent sites.

4.11.5 Block B also pushes forward to the street boundary, which compromises frontage continuity and increases its footprint and overall mass, which along with the proximity of the blocks creating visual coalescence from many viewpoints, adds to the sense of **overdominance**, and has a **negative impact on the town centre and wider views**.

4.11.6 The central courtyard between blocks is a highly constrained space with all existing trees removed and overshadowing from both the location of the Block A to the south of this and over-sailing of the space by both the proposed buildings. Its usable space will also be compromised by the proposed public route access through both buildings, the necessary structures (not shown) which will be required to address the level changes and the multiple uses which this space is expected to accommodate.



Fig. 5.1 Proposed **View B** - with and without appeal scheme, but including 66-70 High St..



Fig. 5.2 Proposed **View C** - including both appeal scheme and 66-70 High St

5

Commentary on VuCity Views

5.1 Introduction

5.1.1 This section directly addresses the visual impacts of the views from the appellant's TVIA by ETLA. The views are from the latest updated TVIA Part 6, Rendered VuCity Images, June 2024 (CD 1.46). These views both with and without the appeal proposal can be seen in the documents which includes more data and some existing photographs, however these ones are reproduced here as an aid to reading the proof..

5.1.2 The locations of the initial views provided were not agreed with the Council and the most recent views, however following requests from the Council and PINS those from additional locations were provided by the appellant. These arrived quite late in the appeal process, however it is the most recent images that are addressed in this section.

5.1.3 I specifically address six of the views, which most clearly show the negative townscape impacts of the appeal proposal. These and others will also be addressed in the Heritage proof for their impact on the Conservation Area and wider heritage assets.

5.2 The Views

View B

5.2.1 See opposite fig 5.1. View B is looking east up Ethelbert Rd from within the park area. The views from lower on the hillside show clearly how the appeal scheme is too tall for its context, with both blocks reading as taller than the High St building, with Block A standing out as particularly tall (it is 2 storeys higher than both Block B and the High St building in absolute terms) and even though in this view it is set lower down the hill, it still reads as clearly taller than the building at a higher level.

5.2.2 This building should be clearly lower than the High St building (stepping down to the west) as well as lower than Block B, stepping down towards Henry House to the south, in the background in yellow.

5.2.3 The close proximity of the two appeal buildings also visually coalesces these into a single form in this view, emphasising their large scale with no 'open sky' to be seen between them.

5.2.4 The significant areas of blank wall or minor windows in the western elevations, particularly to Block B (on the left) also add to the sense of a large and unadorned building and provide a signal that the blocks are very close to their respective boundaries and are therefore limiting the fenestration to these elevations.

5.2.5 The comparison of 'before and after' images also picks up the assertive street elevation of Block B which can be seen to step forward of other existing buildings on its street frontage, ensuring an even less compatible relationship with the existing houses.

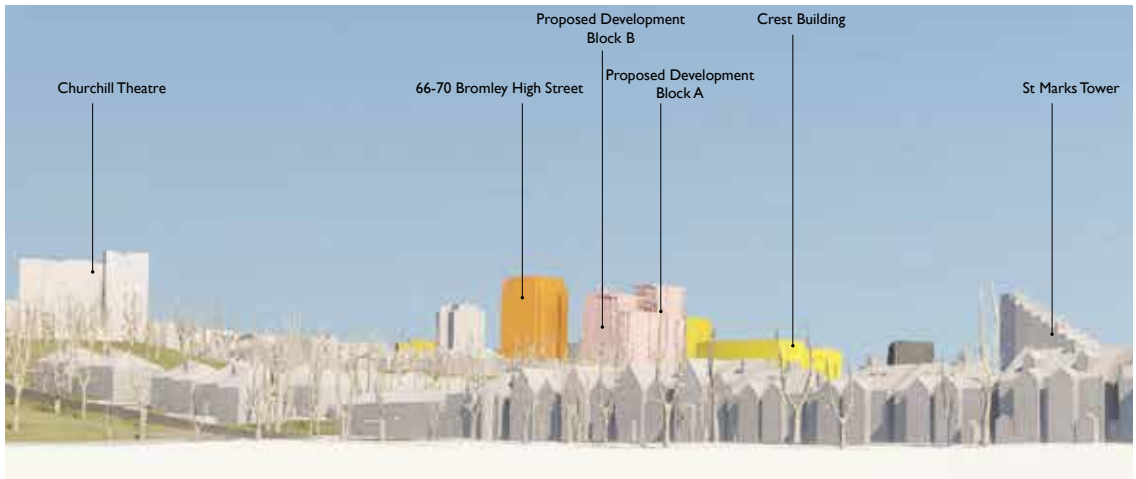


Fig. 5.3 Proposed **View E** (cropped for legibility) - including 66-70 High St.



Fig. 5.4 Proposed **View G** - with and without appeal scheme, including 66-70 High St.

View C

5.2.6 See previous page fig 5.2. While the appeal scheme buildings can be clearly seen separately in this view, they join with 66-70 High St in the background to form a large block of built form in this view.

5.2.7 Block A clearly steps up from Block B and from the High St building which means they fail to respond to or reinforce the downward slope of the High St in this part of the town centre. A step down in height to the existing Henry and William Houses would express this better. Block B should also read as distinctly lower than the High St building.

5.2.8 This view clearly shows the large expanse of blank/minimal window walls to the scheme facing west as noted above in View B.

View E

5.2.9 See opposite fig 5.3 This is a zoomed in and cropped view from that in the views document. This has been done to express more clearly the heights relationship of taller buildings in the wider context. The Churchill Theatre and Library on the upper plateau is appropriately the tallest built form in the view, with the St Marks Tower identifying the heights and location of the emerging Bromley South cluster, while the consented 66-70 High St identifies the start/end of the top plateau, main shopping area and conservation area and Henry and William Houses sit lower down the hill and at lower heights in both west and south directions.

5.2.10 The two appeal scheme buildings read as a single element and Block A stands as tall as 66-70 (in absolute terms), therefore undermining the required transition down the slopes. The appeal proposal buildings together express a mass as large as the Churchill Theatre, also undermining this buildings' primacy, while their proximity to the High St building challenges its wayfinding identity.

View G

5.2.11 See opposite fig 5.4 This view is a more street-based version of View B, looking from the base of Ethelbert Rd where it meets Ravensbourne Rd at the bottom of the hill. This view shows very clearly the townscape impact of the forward push of the building to the street boundary, with the houses very clearly set behind front gardens, while Block B almost completely obscures the side elevation of 66-70 High St and totally obscures the Salvation Army frontages.

5.2.12 This view is from the opposite footpath from the site-side of the street, where a viewer would certainly expect to clearly see a continuous street frontage when looking up the street, but this is undermined by the appeal scheme's push forward.

5.2.13 Again there are large areas of blank wall shown to the elevations. Although fewer windows shown on the westerly elevations could arguably reduce the sense of overlooking experienced from lower down the slopes, there are still 14 floors of balconies on the corner of Block A looking towards the west, and the mass of blank wall projects poor quality architecture, undermining the local townscape character.



Fig. 5.5 Proposed **View J** - including both blocks of the appeal scheme and 66-70 High St

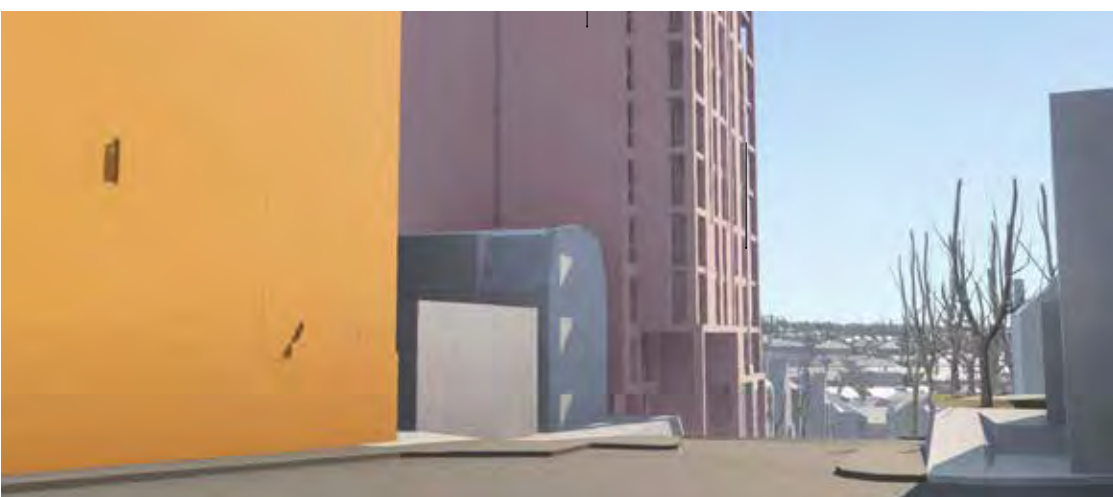


Fig. 5.6 Proposed **View K** - including 66-70 High St and with/without Block B along Ethelbert Rd

View J

5.2.14 See opposite fig 5.5. Further up Ethelbert Rd from the previous View G, this more clearly shows the forward push of Block B to dominate the street. It can be seen in this view that the ground and upper ground floor levels are set back and these do expand the entrance area of the building, however the footpath itself does not increase in generosity as the entrance area is taken across at the site at a single level with retaining wall separation at the footpath edge, except at the centre.

5.2.15 This view accommodates the openness at ground level, shown by the low level view toward 66-70, however this does not mitigate the negative townscape experience of the overall projecting mass of Block B into the streetscape of Ethelbert Rd.

View K

5.2.16 See opposite fig 5.6 This view looks from the corner of Ethelbert Rd where it meets the High St, looking west towards the suburban areas of Bromley. The upper view shows the approximate continuity of the street frontage along the south side of Ethelbert Rd, including a variety of building types from the existing older housing to the Salvation Army buildings and the consented 66-70 High St at the top of the street.

5.2.17 The appeal proposal Block B would undermine any sense of townscape continuity in this view because its forward projection to the back of pavement boundary line largely obscures the lower frontages, removing the visual continuity. Block B in this position becomes a very overbearing form to the street and wider area.

5.3 Summary

5.3.1 These views reinforce the points made in the reasons for refusal and elaborated on in Section 4.0 of this proof of evidence, stating that the proposed development represents overdevelopment, as the proposals are shown to be overheight and overscaled for the appeal site and wider context in every view examined here.

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6

Summary and Conclusions

6.1 Introduction

6.1.1 As set out in Section 1.0 of this proof, my name is Amanda Reynolds, I hold a Bachelor of Architecture degree (NZ) and a Master of Arts in Urban Design (Distinction, UK). I am a member of the RIBA and have worked extensively on a range of architecture and urban design projects in the UK and wider Europe. I have over 35 years experience as an architect and in urban design and masterplanning and I have lived and worked in the UK for more than 25 years.

6.1.2 I am acting as an independent urban design (not heritage) witness in support of the Council's Reasons for Refusal nos 3, 4 & 5 of the planning application in question, following the appeal brought against the LPA's refusal of the application. I was appointed by LBB in May 2024.

6.1.3 I address the appeal site context and relevant national and local policy as set out in Sections 1 & 2. Section 3 addresses the site and context analysis and Section 4 onwards consists of my design appraisal. My proof also includes a separate document of Appendices (A3) which includes analytical drawings and further commentary.

6.2 Summary of Proof

6.2.1 The appeal proposal buildings and spaces have been examined in the context of their townscape location and surroundings as well as in the context of emerging and future development within their site allocation area, and within parameters set out in design guidance including Bromley Council's design documents.

6.2.2 The blocks are found to fail to respond sympathetically to their existing or emerging context and character. The height, scale and siting of the buildings produces large and assertive buildings which do not enhance the established character of either the High St area nor the more residential areas stepping down the hills to the west.

6.2.3 The location of the site is not one that justifies the tallest buildings in the town centre. Even with the blocks set lower than the High St level the heights are still challenging to the landmark town centre structure that is the Churchill Theatre and Library, identified as the tallest building in the town centre, while the appeal proposal does not identify any particular civic or community use or wayfinding need that could justify their height and scale.

6.2.4 The proposed building heights do not contribute to a clear transition of heights down the hillside that would meet the lower residential houses in a sympathetic manner. The block heights proposed are too tall and no thought has gone into the potential heights of other buildings that could form a future development on the overall SA10 site within this urban block.

6.2.5 An appreciation of future development that could take place on the rest of the Site Allocation 10 area is required as part of the planning application and this should be used to explore the future context in 3 dimensions (digitally) as part of a justification process for the development proposed on the appeal site. This was not done.

6.2.6 The proposed masterplan produced for the overall site area is presented in 2 dimensions only and demonstrates that the neighbouring blocks have been located in 'leftover' space after the appeal proposal blocks are built to their site boundaries and this would squeeze most of the public benefit opportunities onto the adjacent sites and open spaces.

6.2.7 The appeal site is a logical place to add a north-south pedestrian movement route, however the appeal proposal suggests this should go on adjacent sites, in the future when these are developed. There is an opportunity shown for the link to go through the appeal buildings themselves, however this has not been used as a genuine design driver, therefore the route compromises the building foyer layouts, particularly in Block A to the south.

6.2.8 Entrances and movement routes along the footpaths could have been enhanced with improved public realm treatments, however on Ethelbert Rd the proposed block projects forward out of line with the rest of the buildings along the street, undermining the street edge definition and sense of place, while also reducing any potential for greening the public realm or simply creating more public space for pedestrians.

6.2.9 The central courtyard is in principle a logical idea, however as proposed it is very small, oversailed by both blocks to varying extents and overshadowed for significant parts of the day by Block A to the south-east, which is also likely to inhibit its greening potential and limit its uses. It is unlikely to be a very child-play friendly environment as the workspace uses open out onto the area, it has a public route through its centre and includes a significant area of cycle storage. In addition the size of this space may well need to be reduced to accommodate structural support of adjacent buildings, particularly to the east.

6.2.10 The 2 blocks' close proximity to each other gives the sense of the central space being overlooked as well as undermining the privacy of the new residents who have close views into each others' living rooms, adding to the feeling of overdevelopment.

6.2.11 This sense of overlooking and overbearing scale is experienced by local residents lower down the hill but also in the wider context as the proposal will be highly visible from the west and north in particular, as well as from the town centre shopping area.

6.2.12 The independent Design South East Review Panel and the GLA both made clearly critical comments of the appeal proposal's height, scale, form and relationship to the SA10 area as well as the wider town centre. These comments were not acted upon.

6.3 Conclusions

6.3.1 Having assessed the design issues relating to the appeal proposals in the previous sections of this proof and measured these against the relevant design policies as set out in National, Regional and Local policy documents, including the Site Allocation and Town Centre SPD guidance and requirements, I consider that the proposal fails to meet the design policy and guidance requirements for developing this site and it will fail to enhance the existing character of the Town Centre as envisaged in Bromley Local Plan Policies.

6.3.2 Karen Daye's planning proof sets out how the proposals would fail to comply with relevant planning policies as well as guidance in the NDG and NPPF.

6.3.3 In my view the appeal scheme does not constitute the high quality or contextual design as set out in the Site Allocation 10 document, the Town Centre SPD, in such the close proximity to the Town Centre Conservation Area nor for buildings of the layout, density, mass and scale as proposed.

6.3.4 The proposal suffers from a number of design flaws, as set out in this proof (and summarised in the preceding paragraphs), which mean that it would not meet the required standards of high quality design that are expected of tall buildings in London generally, nor enhance the important locally distinctive aspects of the town centre character of Bromley.

6.3.5 These qualities are essential to the achievement of a sympathetic development in this location, and the proposal would therefore be an incongruous, overbearing and harmful addition to the Site Allocation area, the setting of the Conservation Area and the Town Centre townscape character, in both close-up and distant views. On the above basis, I therefore support the Council's Reason for Refusals 3, 4 & 5.


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7

Appendix

See Separate Document - A3

1.0	Constraints and Opportunities	5
2.0	Building Heights Plans	7
3.0	Future Masterplan Approach	9
4.0	Annotated Cross-Sections	11

The logo for ARUrbanism, featuring the letters 'AR' in a stylized, outlined font followed by the word 'Urbanism' in a solid, sans-serif font, all contained within a dark red rectangular background.

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