



Appendix to Proof of Evidence

by Amanda Reynolds RIBA, MA (UD)

2-4 Ringers Rd, Bromley BR1 1HT

for Bromley Council

June 2023

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

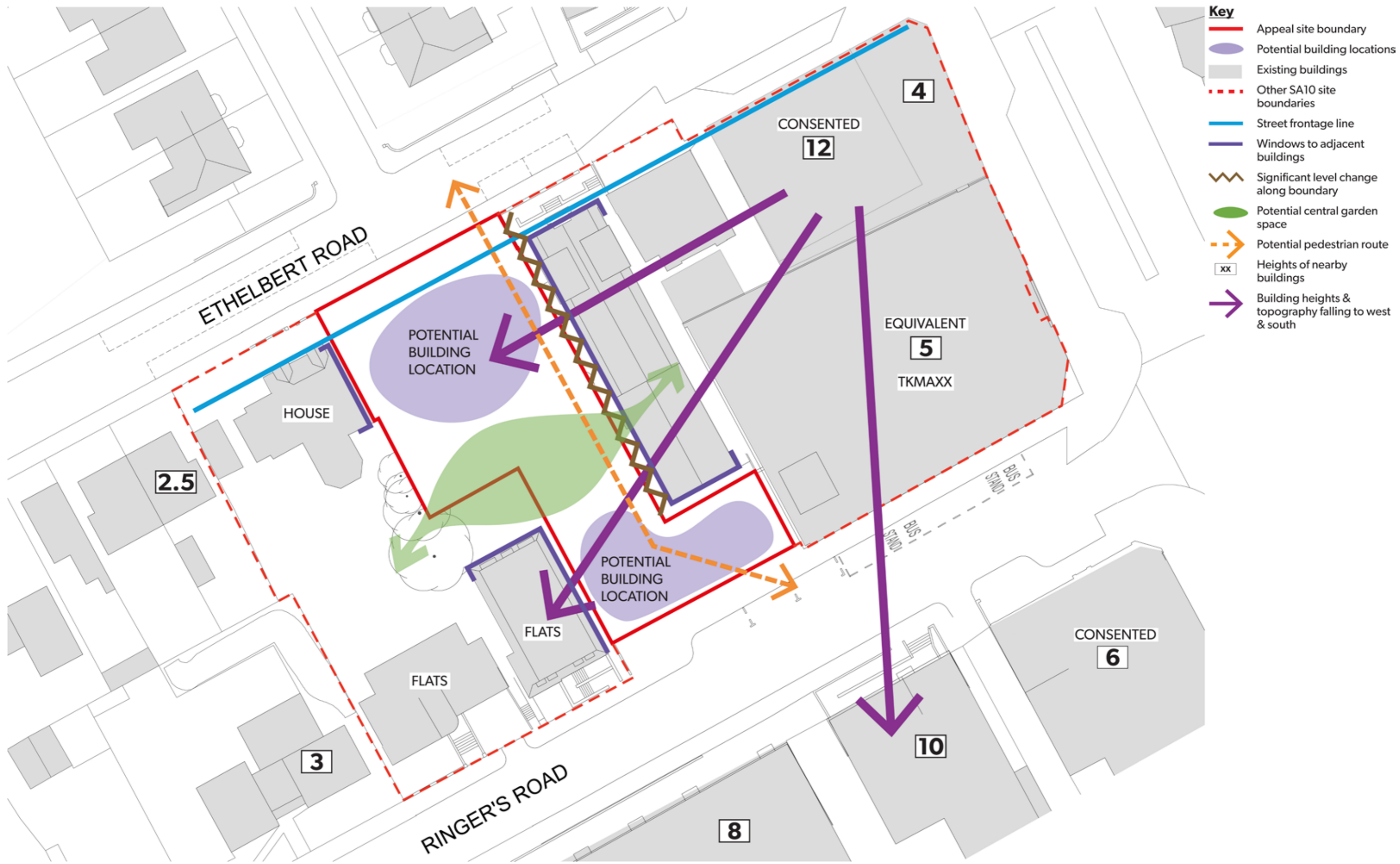
Proof of Evidence

by Amanda Reynolds, Architect and
Urban Designer B.Arch, MAUD (Dist.),
RIBA

Council refs: DC/21/05585/FULL1
PINS refs: APP/G5180/W/24/3340223

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- Key**
- Appeal site boundary
 - Potential building locations
 - Existing buildings
 - - - Other SA10 site boundaries
 - Street frontage line
 - Windows to adjacent buildings
 - ~ Significant level change along boundary
 - Potential central garden space
 - - - Potential pedestrian route
 - xx Heights of nearby buildings
 - ➔ Building heights & topography falling to west & south



Constraints & Opportunities Analysis Plan

1

Constraints and Opportunities Analysis

1.1 Analysis Plan

1.1.1 The plan opposite (by AR) shows the appeal site in its immediate context, particularly that defined within the SA10 document and located on the same urban block - as bounded by Ethelbert and Ringers Roads, the High St and the balance of the block finishing at Ravensbourne Rd to the south-west.

1.1.2 The appeal site's location within the SA10 planning context is an important consideration in terms of future potential adjacent neighbouring buildings as well as those consented - at present, the 12 storey block at 66-70 High St.

1.1.3 Other important considerations in terms of both constraints and potential for development are the physical aspects of topography - the site falls in two directions and there is likely to be the need for retaining structures along internal boundaries - and the current adjacent buildings, particularly those with windows on or close to the boundary (the Salvation Army building) and residential uses facing towards potential development, as found on the block of flats on Ringers Rd.

1.1.4 These buildings may one day be redeveloped- and the potential for this needs to be considered in the showing of a 'future masterplan'- but they may also remain in their existing uses for many years to come.

1.1.5 A further physical constraint is the consistent frontage line currently exhibited on all the buildings along Ethelbert Rd. This is not the same as a boundary line, however is it a strong definer of local townscape, opening views both along the street and out to the wider town and suburbs and should be respected.

1.1.6 The potential for a pedestrian route through the site should also form part of the basis of the design concept, as shown in the SPD.

1.1.7 The appellant's architects' DAS did not contain an equivalent Analysis Plan as would be expected for a site of this scale and location.

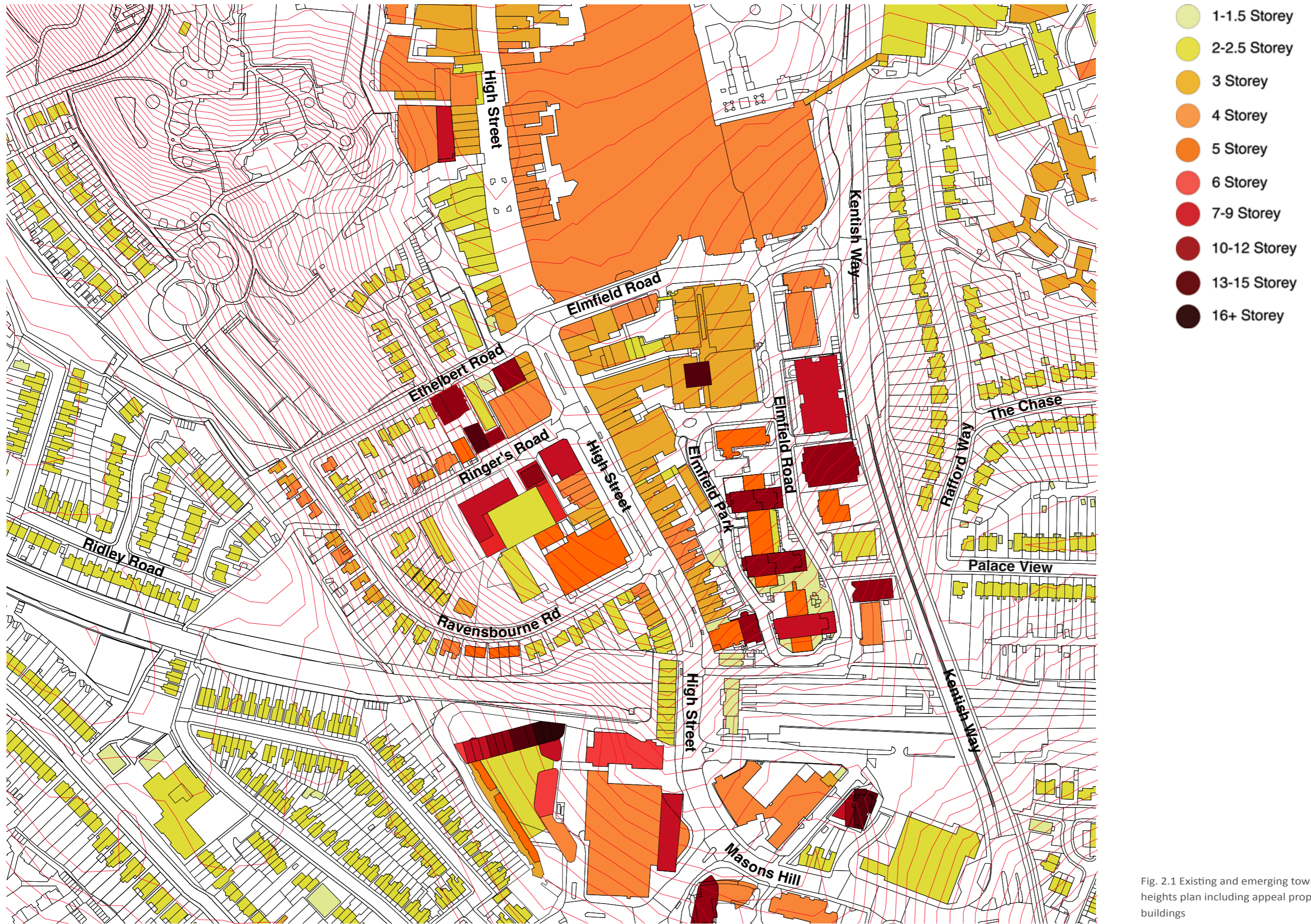


Fig. 2.1 Existing and emerging town centre heights plan including appeal proposal buildings

2

Building Heights Plans

2.1 Local Heights

2.1.1 This page shows the appellant's architects' plan of building heights in the town centre, although it is somewhat crude and without a clear analysis of actual building heights. For instance Henry House and William House (to the south of the appeal site across Ringers Rd) are 2 separate buildings and vary between 8 and 10 storeys, while the large block in Bromley South is only 19 storeys at its peak and it steps down to as low as 4 storeys.

2.1.2 The office blocks to the east of the High St are only tall in their east-west built forms and much lower between.

2.1.3 The concentration of information on Bromley South buildings (no labelling of the Churchill Theatre and Library for instance) is also misleading as the appeal site should relate to the upper plateau and slopes of the town centre in height, not to Bromley South.

2.1.4 The plan opposite (by AR) includes block heights broken down into a more relevant finer grain and also includes the now-consented 66-70 High St close to the appeal site. It is overlaid onto the contour plan, as Bromley town centre needs to be understood in the context of its plateaux (upper and lower) and hillsides (east and west) location.

2.1.5 The proposed appeal site buildings are also shown to explain their inappropriateness in this context.



Fig. 2.2 Hollaway Architects' Town Centre heights plan DAS p.16. Appeal site shown red.

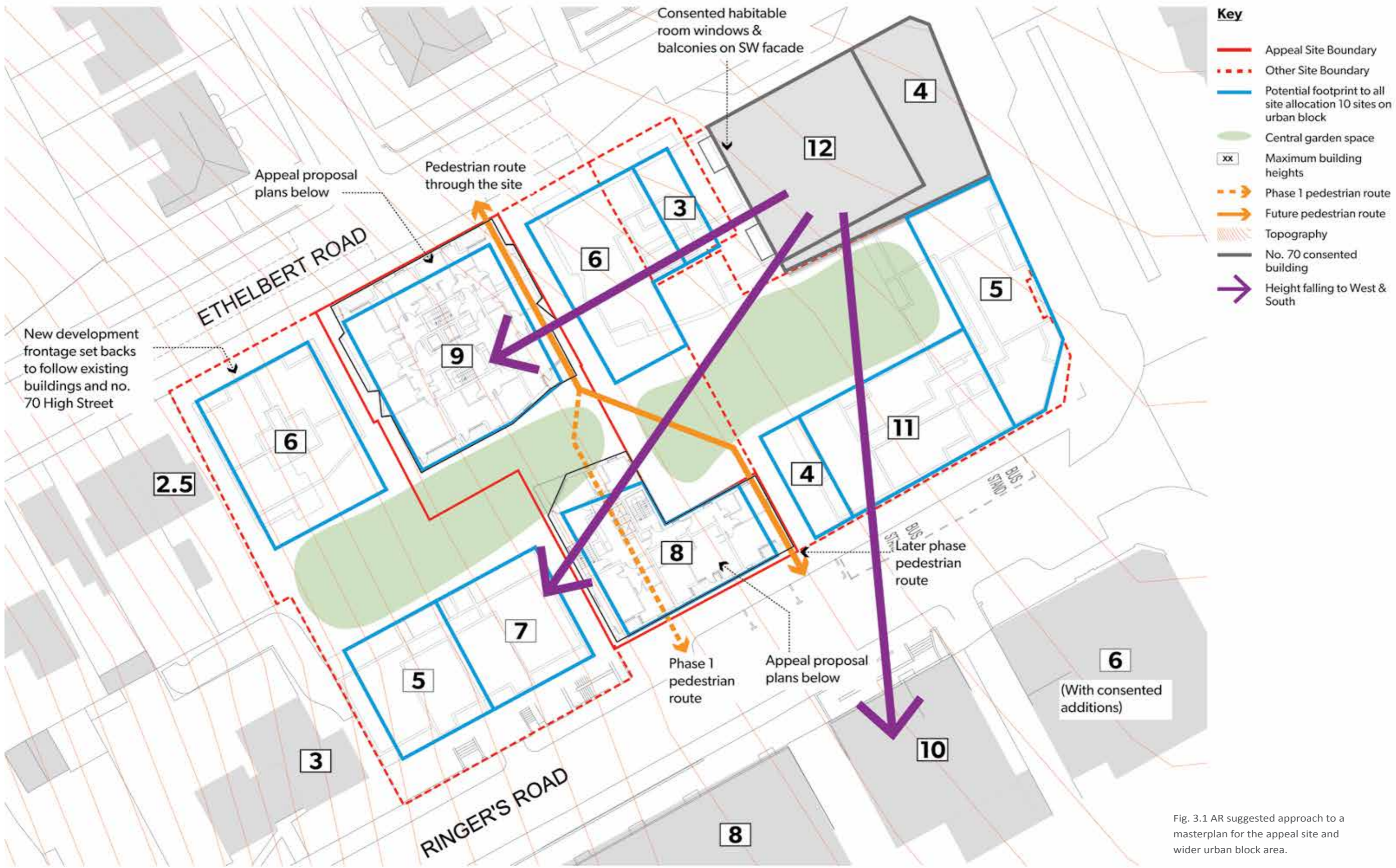


Fig. 3.1 AR suggested approach to a masterplan for the appeal site and wider urban block area.

Potential Masterplan Approach for Urban Block Area within SA10:
 (Annotated Architects' Plans) Appeal site footprints reduced NTS



3

Future Masterplan Approach

3.1 SA10 Context Masterplan

3.1.1 The plan this page is from the DAS Addendum p.10 (shown as is, not adjusted for north location) and shows the appellant's suggestion for further development on the wider SA10 sites, most of which are adjacent to the appeal site, including showing a central courtyard/garden space connecting these buildings.

3.1.2 It is worth noting that the steep topography does not appear to have been considered as part of this concept (no stepping, retaining or ramps shown for instance); the boundary to 66-70 High St is not shown correctly, nor is the consented scheme building shown on the plan, although this proposal was allowed at appeal at least 6 months prior to the date of the DAS Addendum and should form a clear part of the understanding of the present and future potential of the overall site context.

3.1.3 The most obvious point to take from this plan is the scale and siting of the appeal proposal buildings, particularly Block B, which almost fills the site, side to side, and extends completely forward to the street boundary. The adjacent sites' street boundaries are located in the same place as that of the appeal site (back of the existing pavement), however their 'future developments' are shown set back, with their frontages in line with that of 66-70 High St at the corner and the houses further down the street (not shown on this plan). This necessarily makes these buildings' footprints smaller in relation to Block B and emphasises its qualities of overdevelopment.

3.1.4 This existing set back to the street frontage is a positive in townscape terms, however the principle should also be followed by Block B itself, as shown on the AR plan on the opposite page.

3.1.5 This diagram is not a proposed masterplan but shows a more integrated approach to developing a masterplan which takes into account all of the sites' needs and potentials.

3.1.6 The plan shows smaller footprints to both Blocks A & B of the appeal proposal, setting the buildings away further from most of the boundaries and allowing better light and access to the side boundaries. This would create a balanced separation from blocks on either side of the boundary, allowing for pedestrian access and some windows.

3.1.7 Consistent setbacks to frontage boundaries should be made on both streets, to reinforce streetscape continuity and provide space to improve public realm. Also, the courtyard space between the new developments needs to reduce overlooking, support communal activities and bring an attractive green environment that takes advantage of the site's contours to provide green movement routes.

3.1.8 This potential approach also shows possible heights of buildings which reinforce the forms stepping down the hillside and create a genuine transition to the lower houses and blocks below.

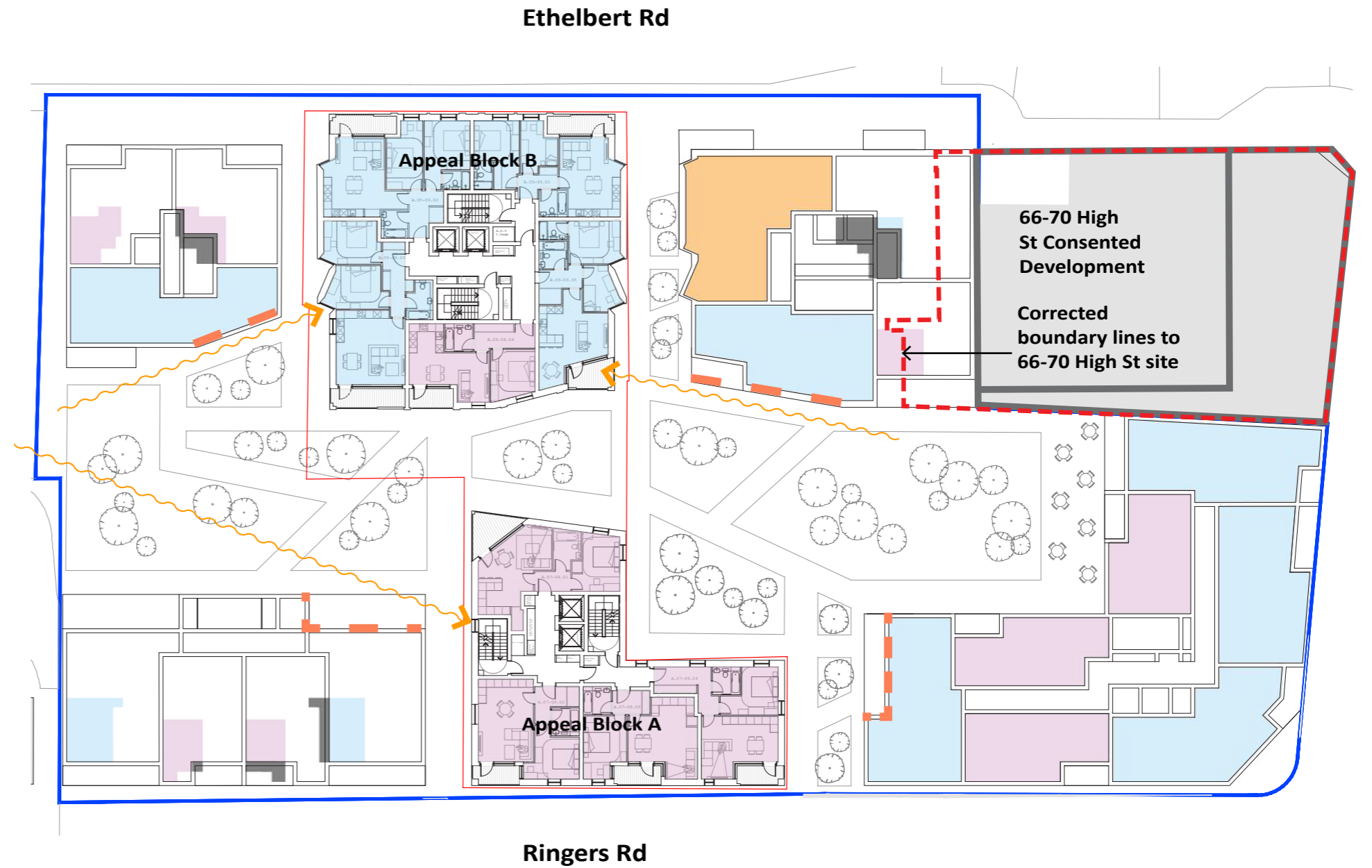


Fig. 3.2 Hollaway Architects' Proposed Masterplan for the balance of the SA10 site within the urban block. Plan from DAS Addendum p.10.

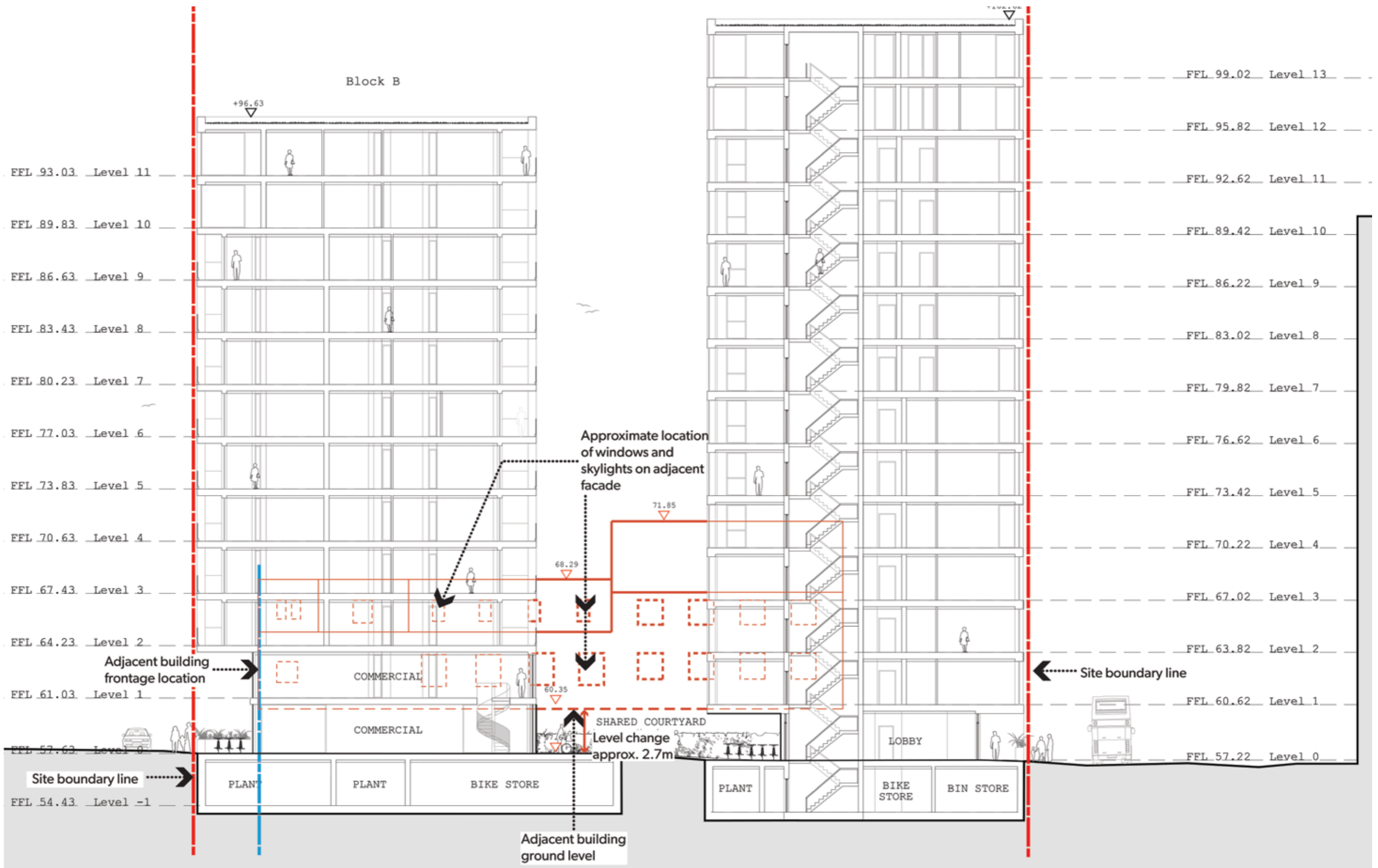
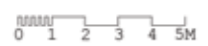


Fig. 4.1 Hollaway Architects' Cross-section 2-2 with AR annotations. Original drawings CD xx



Annotated Long-Section 2-2 through Courtyard and Proposed Buildings NTS **ARUrbanism**

4 Annotated Cross-Sections

4.1 Cross-sections Through Courtyard

4.1.1 The two cross-section on this and the previous page were provided by the appellant following a request for 6 sections in defined locations. These were provided with enough time to study and compare these with the plans, elevations and topographical information also available. The sections on the subsequent pages called A-A, B-B, C-C, E-E & F-F came too late to do anything except provide comments (as noted on the drawings) on apparently missing, incorrect or inadequate information.

4.1.2 The section opposite, called 2-2, shows a long section between the two streets at the courtyard level. This is useful information, however, unlike the second section (this page B-B), there is no elevation provided of the adjacent Salvation Army building which is located very close to the appeal site boundary and has a number of windows overlooking the site and future buildings and courtyard.

4.1.3 The building and windows in red and notes in black are by AR.

4.1.4 From information on the architect's topo plan 100.01, the datum floor levels, roof levels and footpath levels of the adjacent building can be worked out. This shows a 2.7m height difference between the proposed courtyard level and the existing adjacent building. There is no proposal showing how this existing building (about 1.4m away from the boundary) will be retained and kept in place.

4.1.5 The window sizes and positions have been worked out from site photographs and Google Earth and their placement shows that the proposed buildings will be within 1.5m of these windows, on their south side and 9-11 storeys above them. Proposed new windows in the appeal scheme buildings' lower floors will also have close relationships to the existing buildings, restricting light and outlook.

4.1.6 Section B-B on this page shows a section following the steeper slope parallel to the two streets. Window positions on the Salvation Army building shown are approximate but any location in the wall shown would experience the same restrictive impacts, as will the bedroom windows from Block A on the lower 3 floors.

4.1.7 This section shows the level changes on the two cross boundaries of the appeal site, with no retaining structures shown where level changes exist. The elevation of the existing block of flats is shown incorrectly as it is only 4 storeys of accommodation over an open lower ground floor and rear area of parking.

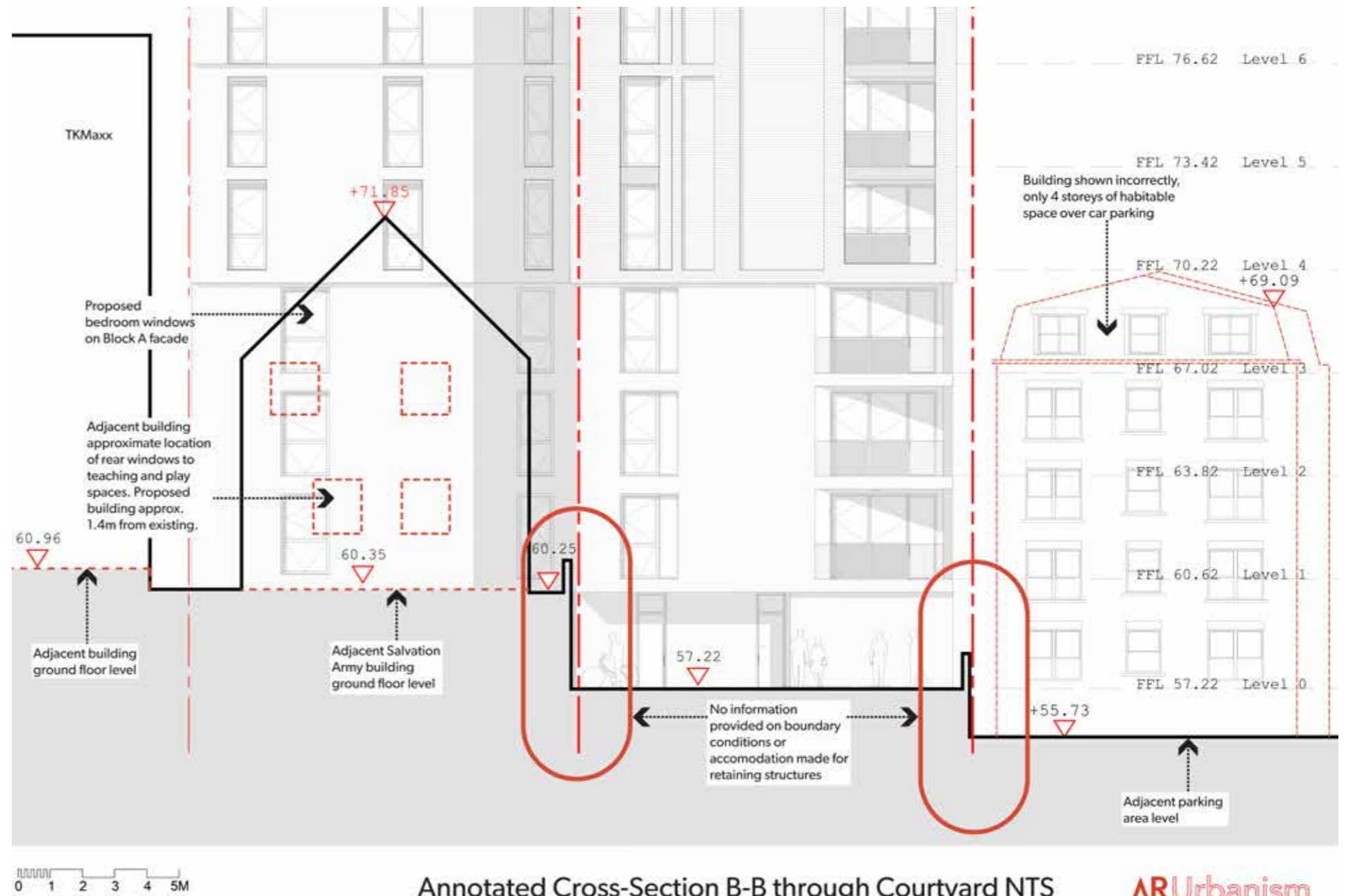
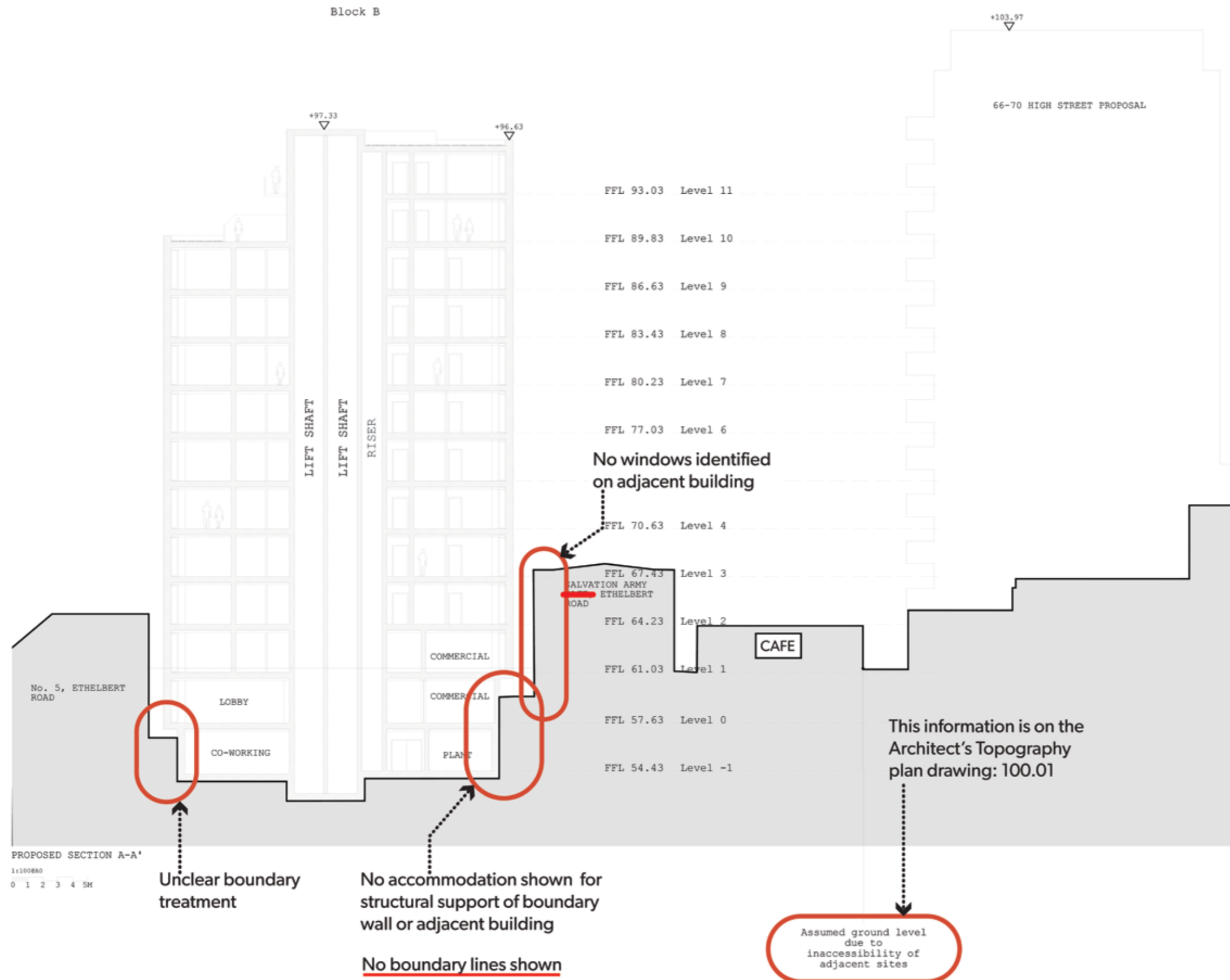


Fig. 4.2 Hollaway Architects' Cross-section B-B with AR annotations.
Original drawings CD xx

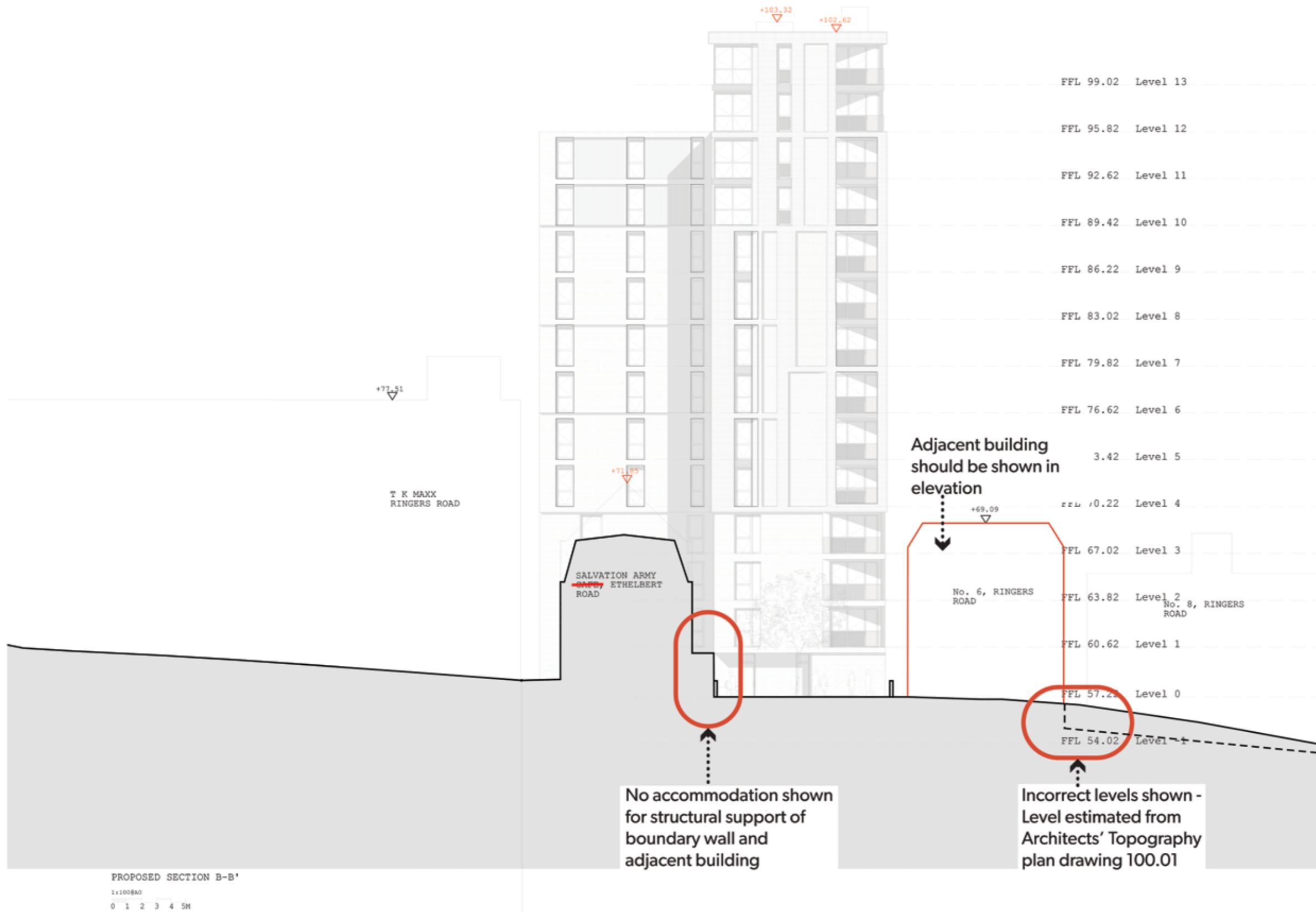


Annotated Section A-A

Architects' Drawing Number: 220.00

Hollaway

Project	18.085	220.00	R2
Client	The Hollaway Group		
Site	Proposed Section A-A		
Phase	PLANNING		
Issue	18.085	220.00	R2

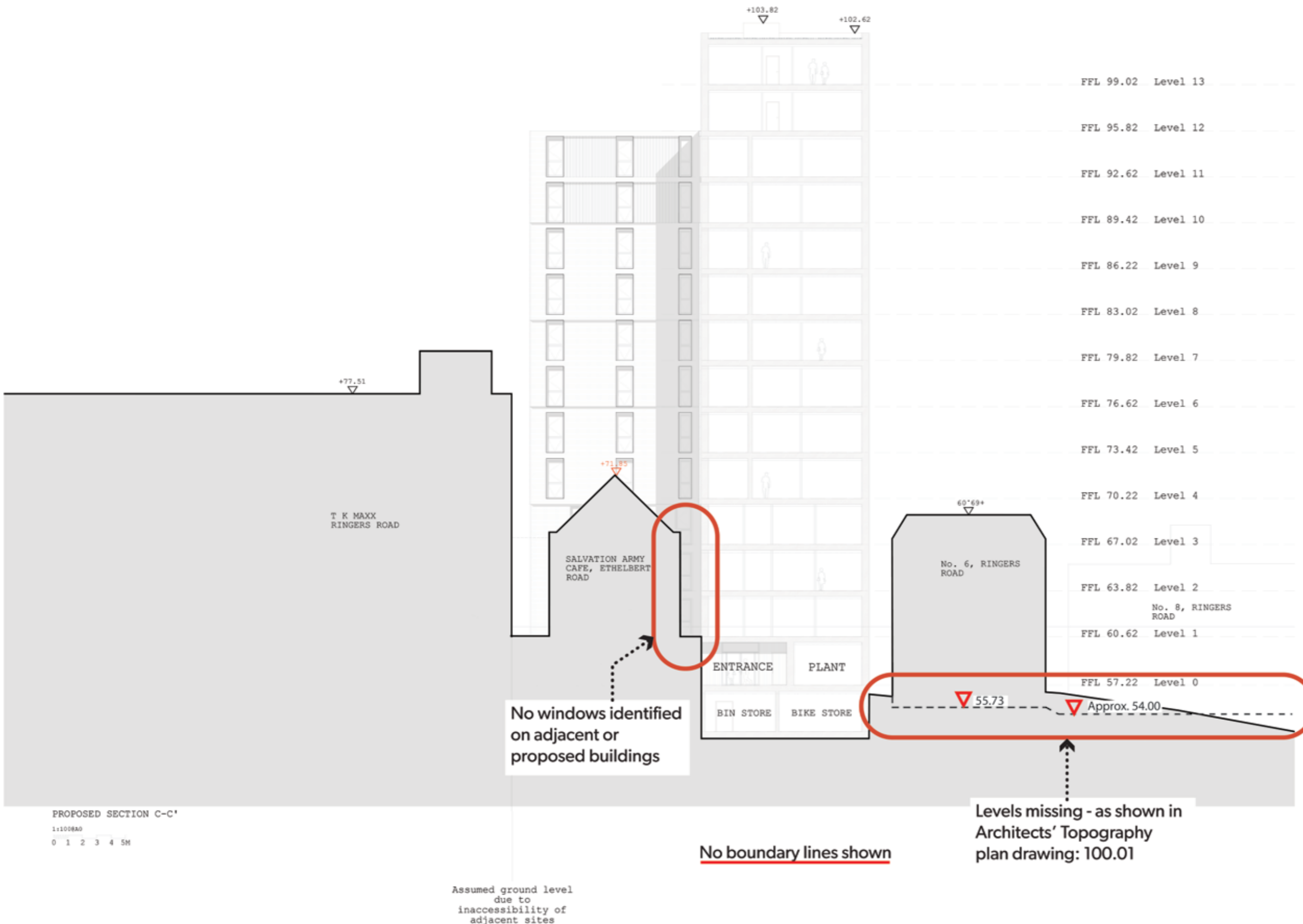


Annotated Section B-B

Architects' Drawing Number: 220.01

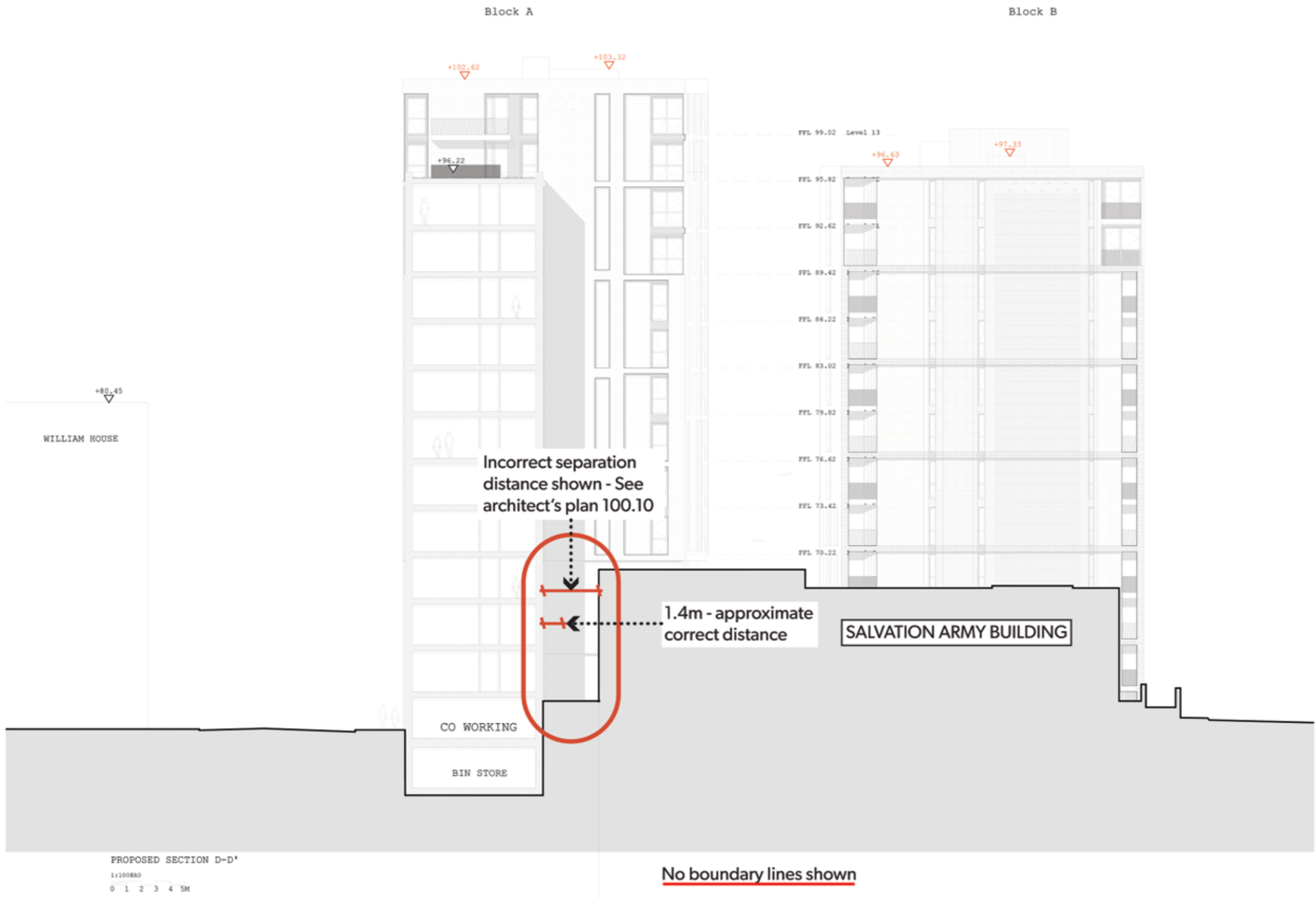
Hollaway

Project Name	18.085	220.01	R2
Client	The Salvation Army		
Location	Ringiers Road		
Scale	1:100	1:1500	1:500
Date	18.08.2018		



Annotated Section C-C

Architects' Drawing Number: 220.02



Annotated Section D-D

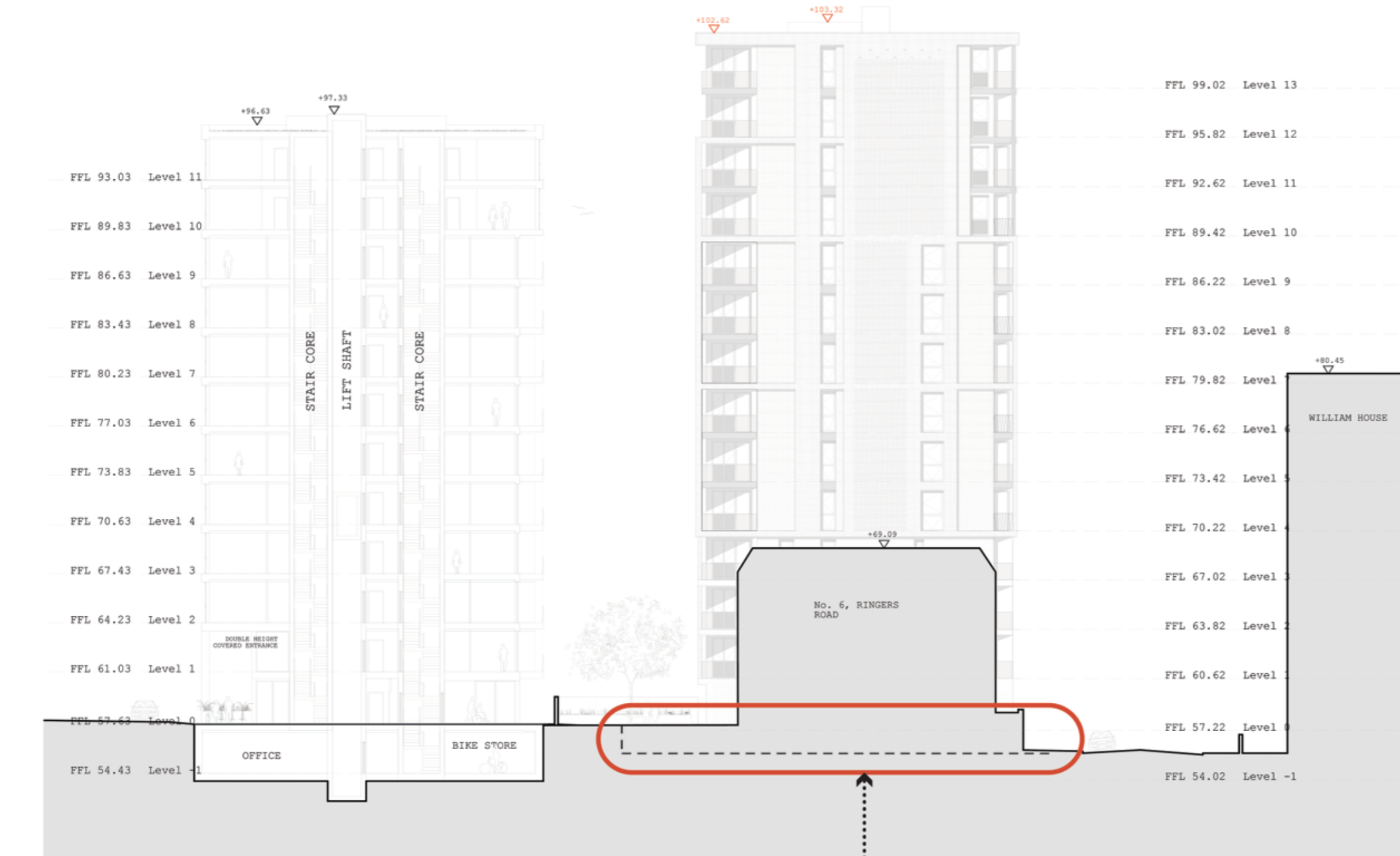
Architects' Drawing Number: 220.03

Assumed ground level due to inaccessibility of adjacent sites

Hollaway

Project	Regent Road
Client	The Salvation Army
Site	Proposed Section D-D
Phase	PLANNING
Scale	1:100
Date	18.08.21
Drawn	GG
Checked	LD
Project Number	18.085
Drawing Number	220.03
Revision	R2

Block A



PROPOSED SECTION F-F'
1:1100RAD
0 1 2 3 4 5M

No boundary lines shown

Section cut goes through adjacent carpark area at 55.73m - Level shown in Architects' Topography plan drawing: 100.01

Annotated Section F-F

Architects' Drawing Number: 220.05

Hollaway

Project	Ringers Road
Client	The Students Group
Title	Proposed Section F-F
Water	PLANNING
Architect	18,085
Date	22.05.20
Scale	1:500
Sheet	R2

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