

Summary of Architectural Proof of Evidence

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2-4 Ringers Road and 5 Ethelbert Road, Bromley, BR1 1HT

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1.0. Introduction

- 1.0. This statement has been provided by Alex Richards and Lianne Clark from Hollaway Studio to support the planning appeal for a residential development on the site of 2-4 Ringers Road and 5 Ethelbert Road Bromley.
- 1.1. This statement refers to several planning application drawings and documents listed, and supported by the Design and Access Statement with DAS addendum which was produced by Hollaway Studio in support of both the original and amended planning application submission.
- 1.2. The purpose of this document is to provide evidence to respond to the reasons for the planning application refusal and support the appeal process. This statement particularly details the thorough design process and iterative feedback from stakeholders and provides evidence to address the issues relating to architecture and design of the scheme which arise from the reasons for refusal.

2.0. Relevant Planning policy

- 2.0. Grenfell and building safety act - second stair:
- 2.1. Following the Grenfell inquiry, new regulations were introduced which imposed more stringent regulations on the design and delivery of High Rise Buildings whereby buildings over 18m required a new staircase and other stringent considerations. This came into effect after the initial planning application was submitted, however the

design team revisited the design to ensure the important safety regulation was accommodated in order that the building could be successfully and safely delivered.

2.2. This work was in addition to the planning level regulations given the time it was submitted, and required coordination with additional consultants that would typically be engaged a planning level.

2.3. London Plan 2023 Revision:

2.4. Throughout the application, the applicant team liaised with officers to ensure that updates to the London Plan 2023 were assimilated into the proposals where possible to ensure that the scheme remained compliant with the evolving regulations. This required significant consultation with the M+E designers, Daylight/Sunlight assessors, and the Health and Safety Executive.

2.5. Bromley Council Area Action Plan:

2.6. The adjoining page is a summary of the work produced by Stitch Architects on behalf of Bromley Council.

2.7. This work was done in collaboration with site owners and active engagement to ensure that identified sites were deliverable from a land ownership perspective.

2.8. This identifies 5 key development zones, to assist with phased delivery of the masterplan, and provide a range of building heights which together meet the required mix and quantum of development across the site, whilst responding to the existing character of the town centre. The

application site lies within zone 2, which identifies a potential location for a taller building fronting Ringers Road.

2.9. The application site falls within areas suitable for development in the Bromley Town Centre Area Action Plan 2010, within Bromley Central. specifically within opportunity site G of the AAP, which has been subject to a more detailed masterplan study in July 2018 titled 'Opportunity site G/10 Bromley, Masterplan'.

2.10. This key site offers significant opportunity to provide a high quality development which aligns with the wider aspirations of the Boroughs masterplan, whilst ensuring it is deliverable in its own right, without reliance on other sites coming forward without precluding the opportunity for other sites to come forwards.

3.0. Summary of Design development

3.0. Hollaway studio were appointed in 2018 to develop proposals for a residential lead scheme for Substantia Ltd on the a parcel of land which spans between the site of 2-4 Ringers Road and 5 Ethelbert Road in Bromley.

3.1. The design team worked closely with Bromley Council and other stakeholders at key stages of the design process to develop the design. The initial site and contextual analysis was undertaken, and massing proposal with conceptual ideas was initially presented to the London

Borough of Bromley Planning Department as part of a formal Preapp, followed by a preapp with the Greater London Authority and presentation to Design South East Design Review Panel.

- 3.2. The scheme has also been subject to extensive public consultation. Throughout this process the scheme has developed following advice and feedback from stakeholders and the public into the current proposals which represent a deliverable, appropriate and exciting development on an under-performing side street within an urban centre.
- 3.3. Final amendments made through the planning process as suggested by statutory consultees ensured the scheme was acceptable to all notable parties including London Fire Brigade, UK Power Networks and the Health and Safety Executive.

4.0. Reasons for Refusal:

- 4.0. 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.

- 4.1. 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.
- 4.2. 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.

5.0. Conclusion

- 5.0. The proposal subject to this appeal has been through rigorous pre-app discussions with the LPA, GLA and stakeholders along with an independent pendant design review panel. The resulting proposal is for a compliant, bespoke and deliverable proposal that would deliver significant housing and work space in a sustainable town centre location
- 5.1. The reasons for refusal do not consider the notable work undertaken to understand the detail work completed to understand the sites context both in terms of the current situation and potential for a wider emerging masterplan. This scheme is both deliverable now, in the current setting, yet does not preclude development opportunities of the wider block.
- 5.2. It could also be argued that this development facilitates its neighbours coming forwards through the introduction of the central green space and linking of Ethelbert Road and Ringers Road
- 5.3. Whist the site is constrained, these constraints have been used to inform design decisions and solutions rather than as a limiter to the design or to the compromise of the quality of the accommodation or architecture
- 5.4. This proposal has responded to all new and emerging legislation delivering second staircases and an integrated M&E strategy to ensure this building stands the test of time and will only improve with a long lasting brick facade and well lit, high quality internal

environments for its residents through the detailed work of the wider consultant team to limit summer solar gains without compromise to outlook.

- 5.5. Notably this brownfield site is able to quickly deliver quality homes suitable for modern standards of living in a highly sustainable way.