

## **CORE DOCUMENT 9.5.2**

### **Heritage Summary Proof of Evidence**

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

On behalf of Ringers Road Properties Ltd

June 2024

London Borough of Bromley Ref: DC/21/05585/FULL1

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

Cogent Heritage Ref: 0909

## **INTRODUCTION, BACKGROUND AND KEY HERITAGE ISSUE**

1. I am Ignus Froneman, Director at Cogent Heritage. I hold a degree in architecture; I am an Associate member of the Chartered Institute for Archaeologists (ACIfA) and a member of the Institute of Historic Building Conservation (IHBC). I have over 20 years of experience in the historic built environment, which I set out in the introduction of my main evidence.
2. I became involved in the appeal proposal after its refusal, when I was asked to consider the appeal proposal independently and support it with an assessment, based on my findings following a site visit and case review. Having done that, I was able to confirm my willingness to act as the Appellant's heritage witness.

## **THE SIGNIFICANCE OF THE CONSERVATION AREA**

3. Bromley Town Centre has origins as a former market town, a former hilltop settlement that was built on a plateau, with the Ravensbourne Valley to the west. By 1894, Bromley had become an Urban District and around this time a node of civic buildings developed around the Market Square area. The town centre has been transformed from a small market town to a busy suburban centre, connected by two railway lines and now containing the principal retail and commercial centre in the borough, as well as the borough's administration centre. In the mid to late C19, carefully considered and ornately detailed commercial buildings often replaced the older, vernacular properties of the market town. The conservation area today encapsulates much of the town centre.
4. There has been major redevelopment in the latter part of the C20, which has brought positive change to the town centre, but this has also changed the character and fabric of the BTCCA, and its hinterland. Within the BTCCA, the Churchill Theatre is the tallest and most prominent of these.
5. Much of the green space in the BTCCA is located along the escarpment and valley to the west of the town centre. The green open spaces make an important contribution to the BTCCA. The Bromley Local Board (predecessors to the Council) bought Martin's Hill in 1878 and it has remained in public use. Church House Gardens is extensively landscaped and well-treed, and has the appearance of a municipal park. The topography and trees limit extensive outward views from the gardens, though some of the taller surrounding buildings, both within the BTCCA (the Churchill Theatre) and beyond, can be seen at various places. This is mostly in glimpsed views but the Churchill Theatre, the closest of these, is the most visible.

6. The BTCCA encapsulates an area of archaeological interest, which is part of its significance.
7. The BTCCA Statement breaks the conservation area down into seven character areas; the closest of these, and the most relevant to the appeal site/proposal are the central section of the High Street, and the Ravensbourne Valley.
8. The Central High Street Character Area extends from Ethelbert Road/Elmfield Road in the south, to Market Square in the north. This section of the High Street has a varied character, but it is united by well-established commercial buildings and uses, with shopfronts, and an almost continuous enclosure to both sides of the street. This creates a well-defined, lively, linear urban environment that hangs together despite the variety in building heights, ages, styles and scales. There is the sense of a relatively fine grain, in places due to the relatively small commercial units even on some of the larger buildings, which tends to break down the perceived townscape grain, at least at the pedestrian level.
9. The remaining historic buildings are a mixture of early and late C19, early to mid C20 buildings. The western side of the High Street notably contains large plots with uncompromising postwar buildings of modern design. There is much variety of shopfronts, building ages and designs, as well as materials and roof forms.
10. According to the BTCCA Statement, the character that the Council wishes to preserve in this character area is that of a fine grained traditional shopping street, with individual shop fronts retained.
11. The Central High Street Character Area is not experienced as isolated from the larger scale, modern hinterland to the south. The southerly views down the High Street are terminated by the neo-Georgian building at 76-82 High Street, but above this the taller buildings outside the BTCCA, can clearly be seen to introduce a different and obviously visible townscape context beyond the conservation area. The approved building at 66-70 High Street would also feature strongly in southerly views down the High Street, where it would become something of a landmark for the modern hinterland beyond the BTCCA.
12. The Ravensbourne Valley Character Area takes in Church Road, which runs west through the Ravensbourne Valley Character Area from Market Square. At the top of Martin's Hill it becomes Glassmill Lane, which sweeps down the hill into the

Ravensbourne Valley. The BTCCA Statement describes Church Road as semi-rural, though I would not describe it as such.

13. The BTCCA Statement describes the view of the church from the High Street, west along Church Road, as one of the best in the town centre. The view from Church Road towards Martin's Hill, terminated by a Victorian lodge, is also highlighted.
14. The character of the Ravensbourne Valley Character Area that the Council wishes to preserve is the open/green and 'semi rural' character.
15. None of the key views identified in the BTCCA Statement directly overlook the appeal site.

#### **THE CONTRIBUTION OF THE APPEAL SITE TO THE SIGNIFICANCE OF THE BTCCA**

16. The BTCCA is surrounded by development. This is mostly suburban, but with more urban areas to the NE and to the south, including the area between the southern end of the conservation area and Bromley South Station. This manifests as taller buildings that can be seen from within the BTCCA in southerly views. The BTCCA therefore has an urban setting to the south, where a general change in the townscape can be experienced and seen in outward views.
17. The introduction of large footprint buildings to the south of Ethelbert Road can already be seen on 1940 aerial photos. The distinction in the townscape between the BTCCA, and the area to the south already existed by that time, although it is now accentuated by larger and taller modern buildings.
18. In views southwards from the southern part of the BTCCA, the larger scaled, modern buildings to the south can be readily appreciated. With the completion of the building for 66-70 High Street, the sense of contrast between the BTCCA and this southern hinterland would be accentuated.
19. The highly urbanised setting to the south of the conservation area, where there is a relatively clear and legible physical distinction between the finer grain townscape of the conservation area and adjoining townscape, does not, in my view, add to, contribute towards, enhance, or reveal the significance of the BTCCA. Views out of the BTCCA to the south provide some context of a different, evolved townscape, but they do not meaningfully contribute to the significance of the conservation area. The role and contribution of the corner building at 66-70 High Street is something

of an exception (this building's facades would be retained as part of the approved development at 66-70 High Street).

20. The appeal site is visible in views outward from the SW corner of the BTCCA, looking away from the conservation area to the street that has been excluded from its boundary. I do not think this is generally the type of view that can be said to enhance/reveal the significance of the BTCCA, which is not appreciable at this location. The appeal site, as part of such views, does not add to the significance of the BTCCA, or the ability to appreciate its significance.
21. From Churchill Gardens, there are places where glimpsed views of the taller/larger buildings beyond the conservation area boundary can be seen and again these allude to a different townscape beyond the gardens.
22. In the broader context/longer views, the low buildings on the appeal site are not visible from the BTCCA. Nevertheless, the appeal site is located within an area where there are large-scale modern buildings in the developments to the south of the BTCCA, which can be seen in the glimpsed views from Churchill Gardens and from the open areas of Martin's Hill and the Queensmead Recreation Ground. These are seen and understood as modern buildings beyond the conservation area, as part of the very different, large scale, modern, hinterland to the south of the conservation area. The approved building at 66-70 High Street, when completed, would also be visible in these views, as a well-designed new addition to this skyline.

#### **THE EFFECT OF THE APPEAL PROPOSAL**

23. The appeal proposal would be the tallest building in the immediate area. However, in relation to views from the BTCCA, it is located on a site that is approximately 1.5 storeys below the site of 66-70 High Street. The tallest proposed building would be behind 66-70 High Street in views from the High Street, so that in perspective it would, in closer views, appear much lower than the approved building for 66-70 High Street, or of similar height in longer views from the recreation ground.
24. Much like the approved building for 66-70 High Street, the appeal proposal would be visually set amongst other tall structures when seen from the BTCCA.
25. The massing of the appeal proposal would be further stepped back from the High Street than the approved building for 66-70 High Street and therefore have a comparatively more recessive presence in street scenes.

26. The Inspector's comments about the acceptability of a 12 storey building versus that of a 16 storey building can be seen in the context of the 14 storey appeal building, but one that is set further away from the BTCCA, with a stepped massing and approximately 1.5 storeys lower than the 12 storey building at 66-70 High Street, and consequently appearing much lower than the 12 storey building in views from the High Street.
27. The appeal proposal, like the approved building for 66-70 High Street, would be visible from the Queensmead Recreation Ground, with Block A at roughly the same height as the approved building. It would be seen amongst other tall structures, and so it would fit into an existing (and emerging) context of taller buildings visible from here. It is a well-designed and articulated building that would not be harmful, simply because it is visible.
28. The appeal proposal would not interfere with, or affect, the 'key views' in the conservation area, as identified at Figure 10 of the BTCCA Statement.
29. Where visible, the appeal proposal would add to the broader presence and sense of the existing and emerging large-scale modern developments to the south of the BTCCA (in addition to the Churchill Theatre inside the BTCCA).
30. Whilst the appeal proposal would add another visible building, in this context I do not think that the nature of the experience, or the way in which the townscape is understood, would be materially different. Fundamentally, the experience would be similar, i.e. that the townscape of the BTCCA would be juxtaposed with a tall building on the appeal site, amongst others, to the south.
31. I have found no harm to the conservation area due to the appeal proposal.

#### **THE OR AND THE COUNCIL'S SOC**

32. I have considered the Officer's assessment of the appeal proposal in the OR and the Council's heritage case as set out in the SoC. Having gone through both, I have found no substance to Officer's assessment of the appeal proposal, or evidence in support of their conclusions about harm to the significance of the BTCCA, and neither have I found any substance to the Council's heritage case in the SoC.

## **OVERALL CONCLUSION**

33. For the reasons set out in my Proof and summarised above, I have found that the appeal proposal would cause no harm to the significance of the BTCCA.
  
34. This means that the appeal proposal is policy compliant (see also Appendix 1 to my Proof), and that the provisions of s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.