

**CD9.6**

**2-4 Ringers Road and 5 Ethelbert Road, Bromley**

**Proof of Evidence of Richard Hammond - Townscape and Visual Impact Assessment**

**Application DC/21/05585/FULL1**

**Appeal Ref: APP/G5180/W/24/3340223**

For Ringers Road Properties Ltd

June, 2024

<b>Project Ref:</b>	<b>0296</b>
Report Number	R01
Client:	Ringers Road Properties Ltd
Status:	For Issue
Issue/ Rev:	00
Date:	June, 2024

CONTACT

[www.edla.co.uk](http://www.edla.co.uk)  
[office@edla.co.uk](mailto:office@edla.co.uk)

Unit 5, Dane John Works, Canterbury, Kent, CT1 3PP, UK

COPYRIGHT

The contents of this document must not be copied or reproduced without the written consent of EDLA Ltd.

CONTENTS

1.0 Witness Information .....2

2.0 Scope of Evidence .....2

3.0 Processing of the Planning Application .....3

4.0 Townscape and Visual Context .....6

5.0 The Proposed Development ..... 15

6.0 Response to Reason for Refusal 3 ..... 16

7.0 Response to Third Parties ..... 27

8.0 Conclusion ..... 28

9.0 RH Appendix I: TVIA Figures ..... 30

10.0 RH Appendix II: Revised Townscape Assessment..... 31

11.0 RH Appendix III: Revised Visual Assessment ..... 38

12.0 RH Volume I – Updated VuCity Images (refer to separate pdf due to file size)

13.0 RH Volume II – Updated CGI Images (refer to separate pdf due to file size)

## 1.0 WITNESS INFORMATION

- 1.1 My name is Richard Hammond and I am an Associate Landscape Architect with EDLA, specialising in Townscape, Landscape and Visual Impact Assessments (TVIA).
- 1.2 I hold a Post Graduate Diploma in Landscape Architecture. I am a Chartered Member of the Landscape Institute (CMLI) and a Practitioner of Environmental Management and Assessment (PIEMA). I have 20 years' experience in townscape and landscape planning, design and environmental matters.
- 1.3 I have provided professional advice on townscape, landscape and visual impact assessments on a wide variety of developments throughout the UK, London and schemes in the London Borough of Bromley (LBoB). I have undertaken TVIA reviews for the London Borough of Ealing and London Borough of Sutton. I have prepared numerous TVIAs for tall buildings across London, with schemes ranging up to 27 storeys in height and requiring detailed analysis of the townscape and views.
- 1.4 I have provided expert witness advice for residential schemes and tall buildings, including attendance at Hearings, Public Inquiries and Development Consent Order examinations, where my assessment methodologies and findings have been accepted by Planning Inspectors.
- 1.5 In relation to this Public Inquiry, I was appointed in December 2020 and I undertook the Tall Building Study and TVIA for the planning application (CD1.54). I was not involved with the design of the internal courtyard, although this was undertaken by colleagues at EDLA (formerly ETLA).

## 2.0 SCOPE OF EVIDENCE

- 2.1 My Proof of Evidence (PoE) addresses TVIA aspects of Reason for Refusal 3, which states:

*"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 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."*

- 2.2 I address RfR 3 by:

- Chronologically setting out the processing of the planning application in respect of townscape and visual matters, including for approved schemes in proximity to the Site since the planning application submission;
- Setting out the key townscape and visual context of the Site, with reference to the planning application TVIA (CD1.54);
- Reviewing the relevant design features of the Proposed Development;

- Responding to the RfR with the use of VuCity (RH Volume I) and CGI (RH Volume II), along with an updated assessment to reflect the revisions to the Proposed Development since the planning application and approved schemes in the surrounding townscape; and
- Addressing matters raised by Third Parties.

- 2.3 My PoE addresses the potential effects to the present day townscape and visual context of the Site, accounting for the inclusion of the permitted 66-70 High Street scheme and the permitted extension to Laura Ashley. I suggest that these schemes should be accounted for as part of the baseline against which the Proposed Development should be assessed against.

- 2.4 Whilst I consider Heritage matters as part of my assessment on the sensitivity of the townscape and visual receptor's (people's views), I do not undertake a Heritage assessment. My PoE should be read in combination with the evidence of:

- Mr. Mark Batchelor – Planning (CD9.3);
- Mr. Alex Richards – Architecture (CD9.4); and
- Mr. Ignus Froneman – Heritage (CD9.5).


- 2.5 I confirm that the evidence I have prepared for this Appeal is true and has been prepared and given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

### 3.0 PROCESSING OF THE PLANNING APPLICATION


3.1 The following table chronologically sets out the relevant TVIA matters during the planning application, including updates to evidence base documents and the townscape via approved schemes.

Table 3-1: Chronology of matters relating to the TVIA

Date	Document / Scheme	Relevant Matters
01/12/2020	EDLA Scoping Report sent to the LBoB (via email)	EDLA set out the proposed scope of the TVIA, including the extent of the study area and the representative viewpoints. The LBoB response (17 <sup>th</sup> December 2020) asked for the study area to be increased and additional viewpoints. These requests were included, as set out in the planning application TVIA table 2-1 (CD1.54).
07/12/2020	Shortlands Conservation Area and Bromley Town Centre Conservation Areas extended	The Shortlands Conservation Area was extended to cover part of the railway embankment.  The Bromley Town Centre Conservation Area was extended to cover the pedestrian bridge to Valley Road, at the western edge of the designation.  These extensions were covered in the TVIA baseline analysis.
02/2021	EDLA Tall Building Study (TBS) (CD1.54 Appendix 5)	The TBS reviewed the townscape and visual context of the Site and assessed a range of building heights for Block A (8 to 19 storeys) and Block B (8 to 12 storeys). This range of building heights was modelled in relation to 13 views across Bromley. The TBS concluded that tall buildings could be supported at the Site given Bromley's varied skyline. The TBS was presented at the Design South East Panel and was included in the planning application TVIA (CD1.54 Appendix 5); however the TBS does not form the basis of the TVIA assessment as it is a height and massing study only, and does not illustrate any of the architectural detailing and the final form and height of Blocks A and B. Therefore, any reliance by the LBoB on the TBS to assess the Proposed Development is incorrect, as the assessment should be based on the drawings for determination.
29/04/2021	Design South East Panel Report (CD 3.1)	The Report (CD3.1) notes that development of the Site could contribute positively to Bromley's aspirations for growth in the town centre and that any development must sit alone within its current context given there is no clear structured vision for the wider area.  The Report refers to an Italian hill town model as an appropriate precedent, where the tallest and most important civic buildings are located in more elevated positions of the townscape, such that surrounding building heights are lower in comparison, which is suggested to be applicable to the Site, given it is at a lower topographic position than the High Street.  The benchmark for the Site and the Proposed Development is stated as the Churchill Theatre (170m to the north of the Site), as the tallest building in the town centre and with a civic role.  The proposals for a diagonal roof and breaks in materials were not supported due to standing out excessively, nor fitting with the current townscape.  The Report notes that the consideration of long-distance views is thorough, but shorter distance views of the scheme

Date	Document / Scheme	Relevant Matters
		are required. However, these were presented and included in the TBS.  Following the Review, the heights of Block A and Block B were reduced to 14 and 12 storeys, so as to be lower in height than the Churchill Theatre in views from the townscape, as well as other design changes to the internal layout and facades, including the roof profile.
01/05/2021	EDLA email to LBoB in respect of TVIA matters.	EDLA set out that the LBoB scoping response will be addressed, along with locations proposed for rendered images of the Proposed Development for agreement. No response was received from the LBoB.
08/2021	TVIA submitted as part of the planning application (CD1.54).	The TVIA (CD1.54) sets out the existing townscape and visual context of the Site (the baseline), as well as a future baseline accounting for the Churchill Quarter and the Stitch Masterplan.  The likely townscape and visual effects of the Proposed Development were predicted for the Proposed Development in relation to the existing baseline, and in relation to the future baseline, given the length of time that the Churchill Quarter had been validated.  In isolation, the Proposed Development was assessed as resulting in beneficial townscape and visual change due to forming a co-ordinated arrangement of buildings with the Crest Building (Henry House and Willam House) on Ringers Road, providing interest to the streetscape and skyline and the architectural quality of Blocks A and B.  In combination with the Churchill Quarter and Stitch Masterplan, the Proposed Development was assessed as forming a co-ordinated part of the townscape and integrating with the wider design intent, whilst the overall perception and visibility of the Proposed Development would reduce, due to the increased building heights across the town centre.
21/11/2022	66-70 High Street Approved via Appeal	Planning Appeal APP/G5180/W/21/3285586 (CD7.1) approved permission for a new 12 storey building 30m to the west of the Site, at the junction of Ethelbert Road and the High Street.    Image 3-1: Extract of the S2 Estates Elevation for 66-70 High Street, viewed from along Ethelbert Street.

Date	Document / Scheme	Relevant Matters
		<p>The Inspector noted in allowing the appeal that:</p> <p>A. The scale and design of High Street varies significantly. Taller buildings are located south of High Street, with 10 storeys (Henry House) on Ringers Road and St. Mark's representing a noticeably taller building (paragraph 10);</p> <p>B. The Churchill Theatre is a strong feature of the street scene (paragraph 11);</p> <p>C. Views south along the High Street from in and around the Churchill Theatre appreciate the smaller scale of the Conservation Area (CA) against the larger and more prominent feel to the southern, non-pedestrianised end (paragraph 12);</p> <p>D. Henry House and St Mark's provide a back-drop and context of greater height when viewed south from the CA (paragraph 12);</p> <p>E. Effects of 66-70 High Street reduced by being seen within other tall structures; having a recessive presence in the street scene and that when viewed in the context of Henry House, the additional two storey height of 66-70 High Street would not be significant (paragraph 14);</p> <p>F. Just because something may be visible however, it does not automatically follow that it would be harmful (paragraph 15);</p> <p>G. 66-70 High Street would become a feature of the skyline in the neutral to positive sense, rather than the harmful one (paragraph 15);</p> <p>H. The obvious presence of 66-70 High Street and contrast in scale to the CA is largely the point and there is context for height via Henry's House (paragraph 16).</p>
05/2023 – 06/2023	Revised Architectural Drawings for the Proposed Development, including DAS Addendum (CD1.61)	<p>The design changes included a more active frontage to Block A at ground level, adjacent to Ringers Road, including additional and enlarged glazing, as well as a second stair to both Block A and Block B. Solid panels were also introduced on the upper storeys of Block A and Block B, to reduce overheating.</p> <p>The planning application TVIA (CD1.54) was not updated as the changes were assessed as not altering the predicted townscape and visual effects.</p>
05/07/2023	Issue of the Bromley Urban Design SPD (CD5.1)	<p>The purpose of the SPD is to provide guidance on urban design, via setting out the principles for achieving good design, whilst not being overly prescriptive.</p> <p>The SPD notes Bromley's built environment is varied (paragraph 3.21) and that Bromley Town Centre is an Opportunity Area (paragraph 3.46).</p> <p>Similarly the central High Street is of varied character (paragraph 3.48), with large plots along the western sides of the High Street (paragraph 3.49) and that beyond the immediate town centre there is a dramatic contrast between the town centre and the residential suburban setting (paragraph 3.55). There is no specific mention of Ringers Road, nor Ethelbert Road.</p> <p>Six overarching design principles are set out covering contextual, responsive, connected, inclusive, healthy and</p>

Date	Document / Scheme	Relevant Matters
		<p>sustainable components. I return to these in my response to the RfR.</p> <p>There is no reference to design for Bromley requiring an Italian Hill type model, nor a subservient response to civic buildings like the Churchill Theatre, as suggested by the Design South East Panel Report (CD3.1).</p>
18/10/2023	Bromley Town Centre SPD (CD5.2)	The SPD divides Bromley into a series of character areas, along with associated guidance. The Site is covered by the High Street character area, with associated guidance, which I return to in addressing the RfR.
03/01/2024	Validation of Section 73 for 66-70 High Street ref: 19/04588/RECON	Material amendment to 66-70 High Street to include a second escape stair and raising the building height by 700mm.
20/03/2024	62 High Street Approval (Laura Ashley) ref: 21/04667/FULL1	<p>Approval for a 3 storey roof extension to the Laura Ashley building, 27m to the south-east of the Site, equating to 20m in total height.</p>  <p><i>Image 3-2: Extract of the front (east) elevation of the approved scheme, looking towards Ringers Road.</i></p>
04/2024	LBoB Statement of Case	Several townscape and visual matters were raised, which I have addressed in the following section and in the response to the RfR.
02/05/2024	LBoB email to Mr. Batchelor	Requests for an updated TVIA of the revised scheme and additional viewpoints to be confirmed on the 10 <sup>th</sup> May 2024. The updated TVIA is included as an Appendix in my PoE.
10/05/2024	LBoB email to Mr. Batchelor	<p>Locations for 7 new Vucity views, with requests for the Churchill Quarter and Stitch Masterplan blocks removed from the images, but with the inclusion of 66-70 High street.</p> <p>These 7 new images have been included in the updated VuCity images presented in <b>RH Volume I</b>. Updated CGI's have also been undertaken, set out in <b>RH Volume II</b>. Both the VuCity and CGI's have been shared with the LBoB in advance of the exchange of PoE's.</p>
04/06/2024	LBoB email to Mr. Batchelor	<p>2 new view locations requested from the northern part of the High Street and southern part of Church House Gardens.</p> <p>These 2 new images have been included in the updated VuCity images presented in <b>RH Volume I</b> and shared with the LBoB in advance of the exchange of PoE's.</p>

**London Brough of Bromley Statement of Case (SoC) (CD10.1)**

3.2 The following townscape and visual matters from LBoB SoC in respect of the planning application TVIA (CD1.54) are set out in italics below, with a subsequent response. LBoB matters relating to the Proposed Development and design are addressed in the following chapters and my response to the RFR.

*The TVIA provides limited analysis and the scope and locations of the viewpoints were not agreed with officers (para 6.37)*

3.3 This is not correct. The TVIA analysed the existing townscape context via a review of published studies, fieldwork and the identification of local townscape character areas to supplement the published studies. The visual assessment identified 36 viewpoints from across the townscape, resulting in a proportionate and representative scale of assessment for the Proposed Development.

3.4 As set out previously in Table 3-1, email correspondence with the LBoB informed them of the intended viewpoints and responded to their requests for additional viewpoints. No formal response was received in relation to emails about the location of the rendered images.

3.5 Emails from the LPA in May and June 2024 have requested additional VuCity views, which have been undertaken and submitted to the LPA in advance of the deadline for exchange of PoE's.

*The TVIA views include the Churchill Quarter and a hypothetical context and proposals for tall buildings are required to make a positive townscape contribution on their own merits (para 6.39)*

3.6 The Proposed Development was assessed on its own merits within the planning application TVIA (CD1.54), via an assessment against only the existing baseline, i.e. not the Churchill Quarter, nor the Stitch Masterplan.

3.7 It was appropriate to include the Churchill Quarter and the Stitch Masterplan in the townscape and visual analysis and as a 'future baseline assessment' as these schemes were pertinent, particularly given the length of time for which the Churchill Quarter had been validated.

3.8 A future baseline assessment is often a common feature of planning applications and often overlaps with cumulative assessments.

3.9 The Churchill Quarter still remains an area for future development, as set out within the Bromley Town Centre SPD (CD5.2) and the Site 10 allocation ultimately suggests future change to the townscape. These principles are reflected in other planning applications, most recently with the permitted extension to Laura Ashely, which included the following graphic to demonstrate a future context of Bromley's townscape.



*Image 3-1: Extract from Planning Application 62 High Street, with the Laura Ashley building rendered brown and surrounded by taller buildings in yellow (including at the Site – right of image) as part of an interpretation on the 'Vision for Bromley West'. Note the image does not include 66-70 High Street.*

3.10 Therefore, it is not hypothetical to review and assess the Proposed Development in relation to future change, as this is accounted for in principle via planning policy. In any event, the TVIA did assess the Proposed Development on its own merits and against the existing baseline.

## 4.0 TOWNSCAPE AND VISUAL CONTEXT

### BASELINE FOR THE APPEAL

- 4.1 From the previous timeline, I suggest that the context for the Proposed Development and the baseline for the townscape and visual assessment must be the existing town centre along with 62 High Street (Laura Ashley) and 66-70 High Street, as these are permitted schemes.

### TOWNSCAPE

- 4.2 The planning application TVIA (CD1.54) set out the relevant aspects of the townscape, with the key features summarised below for ease of reference.

#### Topography

- 4.3 With reference to the following extract of TVIA Figure L02: Topography Plan (CD1.54 and included in RH Appendix I for ease of reference), the landform across the study area is undulating due to several valley systems and associated watercourses, resulting in a complex pattern of landform, defined by several ridgelines and lower lying valleys.

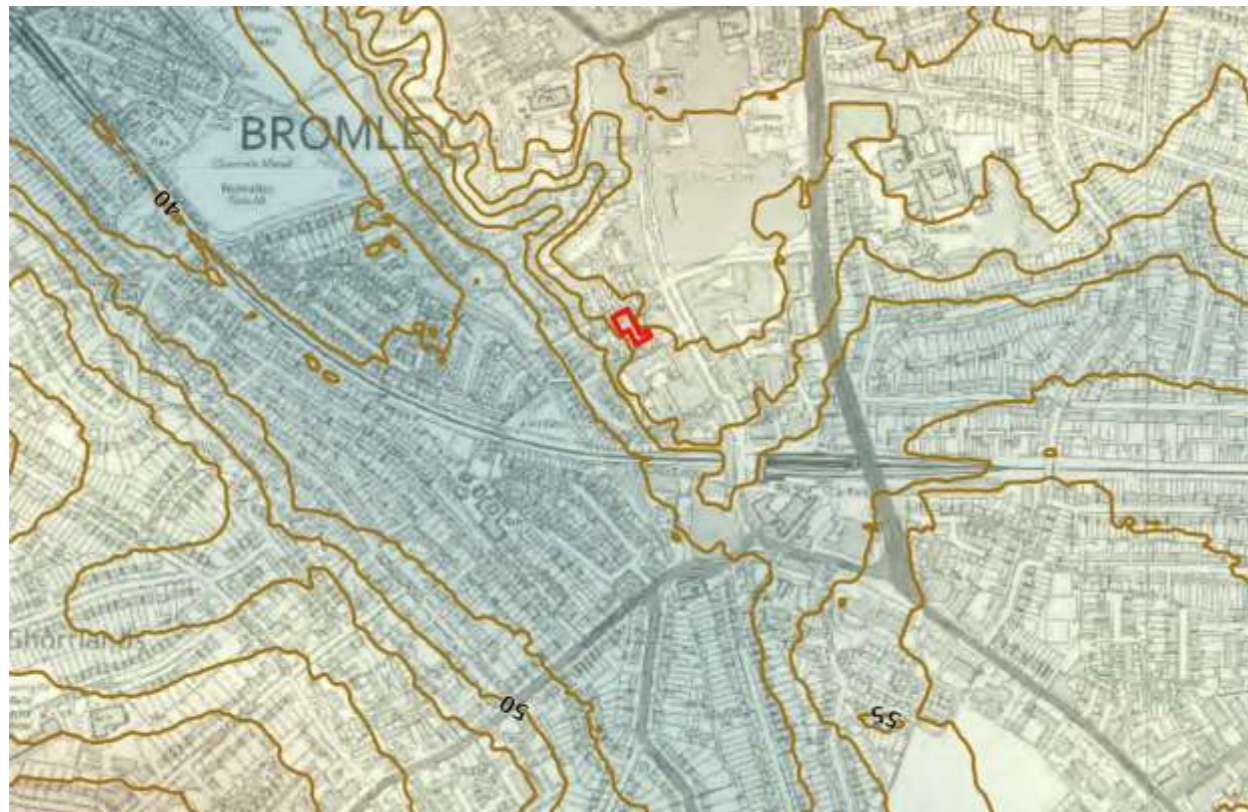


Image 4-1: Extract of the TVIA topography plan

- 4.4 From Bromley South railway station, the landform rises northwards, along the alignment of the High Street, to form a plateau at approximately 65 metres (m) Above Ordnance Datum (AOD) across the pedestrianised part of the High Street, to the north of junction with Elmfield Road and Ethelbert Road.

- 4.5 The landform falls westwards from this junction, along Ethelbert Road and Ringers Road, to Ravensbourne Road, which is situated at a lower lying elevated at approximately 45m AOD. The landform also falls eastwards from the High Street, across Elmfield Road and Elmfield Park Road towards the A21, with more localised variation in levels around Bromley South railway station.

#### The Existing Site Buildings

- 4.6 On Ethelbert Road, the northern façade of no.4 Ringers Road is a red brick building, with alternating bands of windows and double height loading bay doors. The building equates to 3 storeys in height and has a flat roof. No. 5 Ethelbert Road consists of a two storey plus lower ground floor residential building. The building façade consists of a light brown/yellow brick and a symmetrical arrangement of bay windows extending from the façade. These bay windows, and the windows across the second floor, are rendered white.



Image 4-2: View towards the Site from Ethelbert Close, with the TK Maxx building visible to the left and the upper parts of Henry House and William House (the Crest Building) also visible beyond the Site

- 4.7 Nos.2-4 Ringers Road is single storey building. The façade consists of several rectangular windows and entrance doors, but there is no other articulation to the façade.
- 4.8 The existing buildings within the Site are considered to be of limited architectural quality. Nos 2-4 Ringers Road do not contribute positively to the townscape character and the Site's position within the townscape, whilst the proportions, materials and scale of No. 5 Ethelbert Road have some architectural value and scenic quality along Ethelbert Road.
- 4.9 The Site is not covered by any townscape related designations.
- 4.10 With reference to the Bromley Local Plan, the Site is not within an Area of Residential Character nor is it located across the 'major skyline ridges' and nor is it identified as a 'landmark'.

4.11 The Site is covered by LBoB Local Plan Site Allocation 10 (CD4.1) which comprises land within Bromley Town Centre between the pedestrianised High Street and Bromley South Train Station. Site Allocation 10 includes for redevelopment including new homes and within the London Plan, the Site, along with the town centre is designated as an Opportunity Area.

### The Surrounding Townscape

#### Ethelbert Road

4.12 With reference to the Location Plan in **Appendix I**, the north side of Ethelbert Road consists of the Metro Bank, at the junction with the High Street. This is a three storey brick building with a flat roof, except for on the ground floor, which is mostly glass and dark panelling. Churchill Way Road then separates the Metro Bank from the remainder of Ethelbert Road, with Churchill Way Road providing access to the rear of properties along the High Street. Bromley Town Church is to the west of Churchill Way Road and consists of a two storey light and dark red brick building, which is classical in style due to a symmetrical arrangement of windows and a small portico with columns and a pediment, along with a flat roof. Access into the building is via a brick ramp and steps. To the west of the Church are residential properties within Ethelbert Close, consisting of a symmetrical arrangement of two storey semi-detached properties. Their facades are red brick across the ground storey and a light rendered pebble dash across the upper storeys. The southern edge of Church House Gardens is located to the west of these properties, extending for approximately 90m along the northern side of Ethelbert Road, set back from the pavement by a low brick wall and established hedging. With the gardens, mature woodland extends for 40m, with hard surfaced tennis courts and gardens forming the remainder of the frontage with Ethelbert Road. Access into the gardens is at the western end of Ethelbert Road.



*Image 4-3: View from the junction of Ethelbert Road (to the left) and Ravensbourne Road (to the right), illustrating the level change across this part of the townscape and inter-visibility with taller buildings in the townscape.*

4.13 Accounting for 66-70 High Street, the south side of Ethelbert Road will consist of this 12 storey building at the junction with the High Street. There will be a notable step change in scale between 66-70 High Street and the Café, a single storey flat roof building, rendered grey and with a small off-street car-

parking area delineated by bollards. The extent of the brick facade of Tk Maxx beyond the Café is evident from Ethelbert Road, due to its taller height. The Salvation Army Church and Community Centre is situated adjacent to the Café, with a narrow gated passageway forming the transition between the two buildings. The Centre is a red brick building with narrow rectangular windows, equating to two storeys in height, but is elevated above the high street via steps and a ramp, with tall red brick retaining walls, such that the overall height is akin to three storeys, such that it steps up in scale from the Cafe. The Site is then adjacent to the Centre, with the north façade of no.2 Ringers Road at an equivalent height to the Centre, and then no.5 Ethelbert Road steps down in height. The combination of the Café, the Centre and the north façade of no.2 Ringers Road present a series of flat roofs. To the west of the Site, the remainder of south side of Ethelbert Road consists of a mix of two and three storey residential properties, with a range of red brick and white rendered facades. At the junction of Ethelbert Road and Ravensbourne Road is a pale yellow brick two to three storey building with a small external car-parking area. There is also inter-visibility with taller buildings in the townscape from the western part of Ethelbert Road, as demonstrated by Image 4-3.

#### Ringers Road

4.14 The north side of Ringers Road consists of the Tk Maxx building, extending for approximately 35m to the west of the High Street. The building is four storeys in height overall, consisting of a singular rectangular block with a flat roof. The upper three storeys are characterised by symmetrical rows of red brick panels, set within concrete and separated by narrow bands of windows. The ground floor is mostly glass, along with the shopfront signage. The Site (nos.2-4 Ringers Road) is adjacent to the Tk Maxx building, with its single storey height stepping down in scale from the Tk Maxx building. The building heights then step up in scale via no.6 Ringers Road (Simpson Place), which is a four storey building with a converted mansard roof. The building façade is a symmetrical arrangement of windows, with a light brick upper storey and white rendered ground storey. The transition to the pavement is via steps and retaining walls. To the west of Simpson Place is Ringers Court, a four storey building with a white rendered façade. The building form is divided by a cylindrical turret, which extends above the flat roof line. Harestone Court is a three storey red brick building adjacent to Ringers Court, with part flat roof and part pitched roof. There is asymmetrical arrangement of windows across the façade, but there is no architectural detailing. External car-parking areas with garages separate Harestone Court from no.12 Ringers Road (Chadwick Court), a four and three storey light brick buildings at the corner of Ringers Road and Ravensbourne Road. The building is predominantly a flat roof, with no architectural detailing.





Image 4-4: View along Ringers Road from Ravensbourne Road, with the Crest Building (Henry House and William House) on the right. The tall white building in the background of the view is the Mall Tower.

4.15 The south side of Ringers Road consists of the existing Laura Ashley building, which accounting for the approved extension, will equate to 20m in height. The existing building is red brick with large double height windows, and the proposed extension is similarly in brick with a staggered alignment to the building profile. The building scale then steps up from both the existing Laura Ashley building and the approved extension via the Crest Building, the collective term for two separate buildings, Henry House and William House. Henry House extends up to 10 storeys in height. The façade is red brick with dark toned balconies, window frames and louvres, which provide some articulation to the facade and visual interest. The upper storey is set back from the façade is predominantly windows, set below a 'V' shaped roof. A gated 6m wide passageway separates Henry House from William House, which is eight storeys in height and rectangular in form. The building façade mirrors that of Henry House, but with a flat roof, such that from the two buildings are perceived as one unified set of buildings. There is then a notable step change in scale from William House to two and single storey buildings along the remainder of Ringers Road. These smaller scale buildings are brick buildings. Like from the western part of Ethelbert Road, taller buildings within the wider townscape are perceived from along Ringers Road, including St. Marks Tower and the Mall Tower, which in combination with the Crest Building and the extension to Laura Ashley, frame the lower height buildings along the High Street.

#### Ravensbourne Road

4.16 Ravensbourne Road consists of two storey light brick properties between Ethelbert Road and Ringers Road, with architectural detailing around the windows and doorways. The remainder of the road consists of residential properties via a variety of two storey white rendered semi-detached buildings, three storey red brick apartments and with an overall increase in building scale and heights towards the High Street.

#### The Wider Town Centre

4.17 With reference to the following extract of the Bromley Town Centre SPD (CD5.2), the published study characterises the town centre by four character areas, which then have smaller sub-areas, resulting in a total of 8 sub-areas and therefore a varied character. The Site is within Bromley West and the sub-area High Street.



Image 4-5: Extract of the Character Areas and sub-character areas within the Bromley Town Centre SPD, with the Site schematically illustrated by the red dot.

4.18 The SPD notes that the High Street has a varied character and that:

*“Some buildings have survived from the early 19th century; these tend to be modest two storey structures with traditional detailing. The remaining buildings are a mixture of late 19th century to early 20th century buildings; the former tend to be two to three storeys in height with narrow frontages following traditional building plots with well detailed commercial facades in brick.”*

4.19 The stated key characteristics of the High Street sub-area are:

- “Land use – significant concentration of retail, cultural and leisure uses, with a mix of other uses including Bromley Library. Bromley Charter Market operates at the north of the sub-area;
- Prevailing building height – three to four storeys with individual taller element at Churchill Theatre (nine to ten storeys); and
- Development potential – medium to high.”

4.20 As the Site is therefore part of a townscape with a ‘medium to high’ development potential, I suggest it is within part of a townscape which is more able to accommodate change.

4.21 The SPD notes that Market Square, to the north-east of the Site is an area with a more intimate character and where buildings are two to three storeys in height and that the western side of the High Street contains large plots, including The Glades Shopping Centre, 90m to the north-east of the Site, which is a:

*“substantial structure contrasting with the finer grain surroundings; the large footprint contributes to east-west severance within the town centre.”*

4.22 To the west of the Site, is the Church House sub-area, defined by the SPD as:

*“Ethelbert Road, Ravensbourne Road and Ringers Road. These roads largely consist of semi-detached dwellings but have larger-scale buildings nearer to the High Street. Any development in this part of the sub-area should reflect the existing low-rise character and the landscape character of Church House Gardens. Sites at the High Street end of these roads (namely those within the Site 10 boundary) should be assessed using the guidance set out in the High Street sub-area, as these sites accord more with the character of the High Street sub-area.”*

4.23 The stated key characteristics of Church House sub-area are:

- “Land use – public park, low-rise residential houses;
- Prevailing building height – N/A for Church House Gardens, two storeys in adjacent residential area; and
- Development potential – low.”

4.24 The planning application TVIA (CD1.54) identified 14 differing townscape character areas within a 500m radius of the Site, as illustrated by the following extract of the Townscape Character Plan (Appendix I). These character areas were informed by the Bromley Town Centre Area Action Plan (CD4.2), which identified six character areas within a 500m radius of the Site.

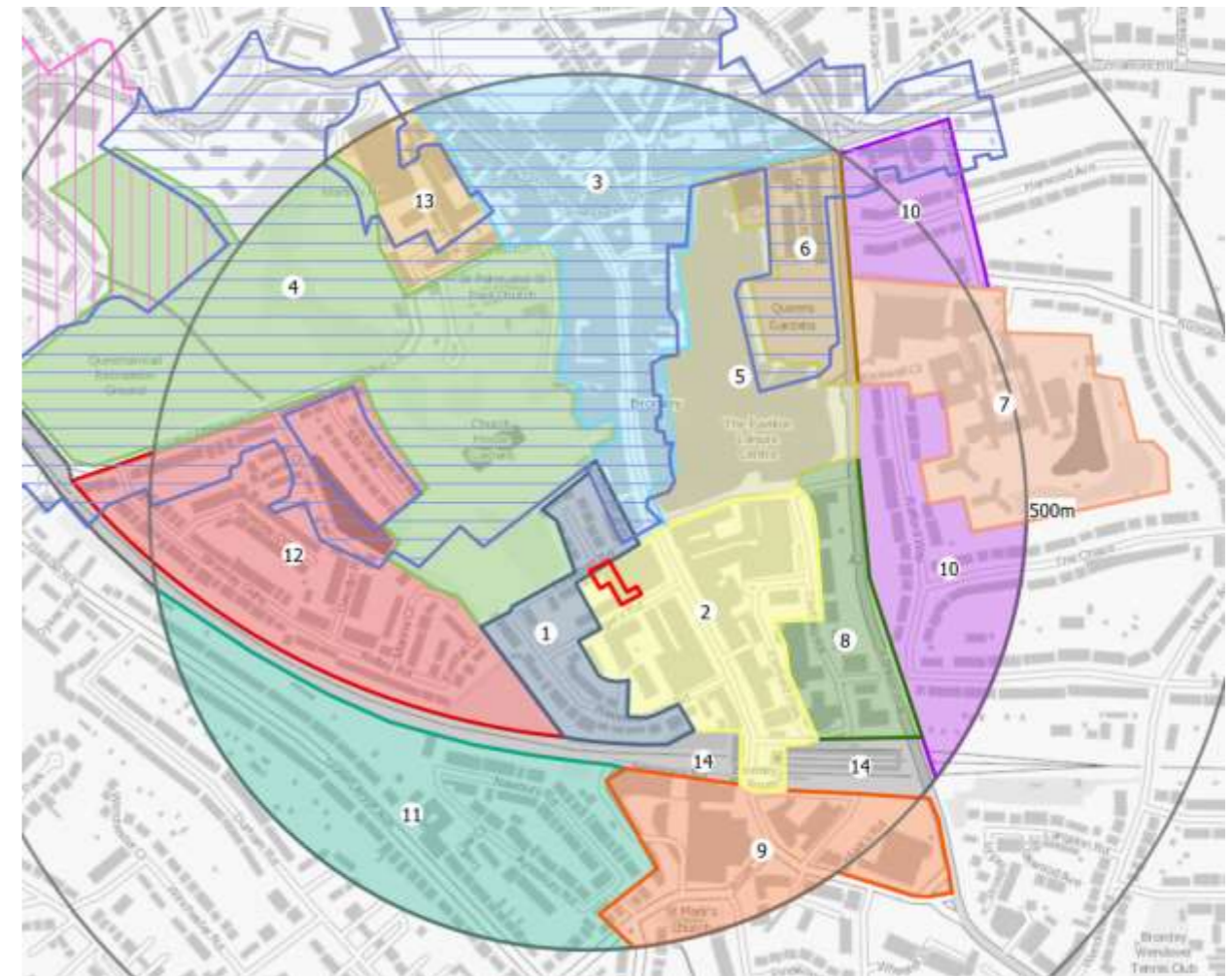


Image 4-6: Extract of the Planning Application TVIA Townscape Character Plan (Appendix I).

4.25 The planning application TVIA (CD1.54) identified a diverse and varied range of buildings across the town centre, with notable and immediate contrasts in scale and height. In addition to the tall buildings in proximity to the Site, other tall building in the townscape include:

- The Bank of America complex, consisting of three tall buildings on Elmfield Road;
- St Mark’s (19 storeys) and characterised by an angled roof profile to the south of the Site;
- Perigon Heights, a range of tall buildings (7, 11 and 17 storeys) to the south of the Bromley South railway station;
- the Mall tower, to the east of the High Street, rising up from the shopping centre; and
- the Churchill Theatre, to the north of the Site, with the highest part of the building approximately 40m above ground level, at 102.9m AOD, equating to around 10 storeys in height.

4.26 This taller building context to the Proposed Development is demonstrated by the following extract of the Design and Access Statement, excluding 66-70 High Street and the Laura Ashley extension.



Image 4-7: Extract from the DAS illustrating existing building heights (excluding 66-70 High Street and Laura Ashley).

#### Townscape Summary

- 4.27 There are a variety of land uses surrounding the Site, resulting in a varied urban structure in terms of building heights, massing and architectural styles. Due to this, the architectural quality of the townscape surrounding the Site is also varied. Taller buildings are interspersed across the High Street, with the Churchill Theatre in the northern part of the town centre, the Crest Building and Mall Tower in the central parts of the town centre and St. Marks Tower and Perigon Heights in the southern part of the town centre.
- 4.28 In closer proximity to the Site, 66-70 High Street will demarcate the eastern side of Ethelbert Road and a notable change in scale from the adjacent single storey café and Salvation Army Church and Centre, as well as two storey residential properties on the northern side of Ethelbert Road. The Ethelbert Road street scene is varied and generally of low scenic quality, with access into buildings often demarcated by steps and ramps which provide additional clutter to the pavement.
- 4.29 Ringers Road is characterised by larger scale buildings overall in comparison to Ethelbert Road, via Tk Maxx, the Crest Building and three to four storey appartements and the future extension to Laura Ashley. Like 66-70, these taller buildings already denote a marked change in scale from adjacent two storey residential properties, as well as a range of architectural styles and forms.
- 4.30 The existing buildings within the Site do not contribute positively to the townscape due to their overall lack of architectural detailing and scenic quality. The Site is part of a townscape assessed by the Bromley Town Centre SPD as having a 'medium to high' development potential and where the main townscape feature is the Churchill Theatre. The Site is therefore part of a townscape with is considered able to accommodate future change and with 66-70 High Street, the Crest Building and the extension to Laura Ashely, taller buildings immediately adjacent to lower height properties, either adjacent to, or set back from the High Street on the more elevated parts of Ringers Road and Ethelbert Road.

#### VISUAL

- 4.31 The Site is not covered by any of the London View Management Framework designated views. Paragraph 5.1.22 of the LBoB Local Plan sets out 'Views of Local Importance' in support of Policy 47 (CD4.1), which with reference to the following extract from the on-line mapping are illustrated by the red arrows.

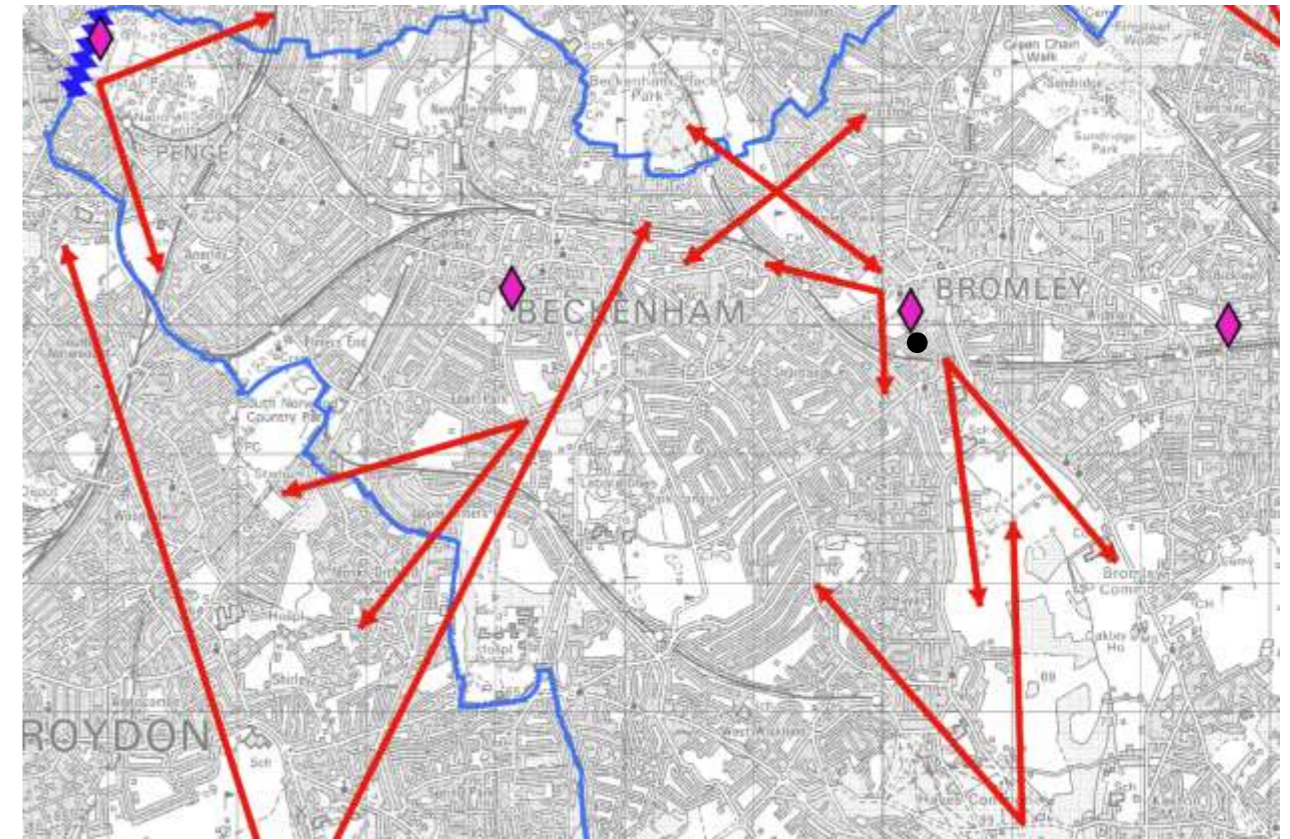


Image 4-8: Extract of the LBoB Local Plan Views of Local Importance, with the Site schematically illustrated by a black dot.

- 4.32 With reference to Table 6.1 of the planning application TVIA (CD1.54), the Site is not within the majority of these views, or that due to distance and intervening features, the Proposed Development would not be visible. Relevant 'Views of Local Importance' are from Crystal Park, Hayes Common, Martin's Hill and the Ravensbourne Valley, which were included in the planning application TVIA as respective viewpoints 36, 35, 16, and 17 (CD1.54).
- 4.33 The Bromley Town Centre Area Action Plan (BTCAAP) (CD4.2) identifies 'key views' from across the townscape, with relevant locations covering the pedestrian bridge over the railway, which was included as viewpoint 8 in the planning application TVIA (CD1.54). Other locations were Bromley South Station, Church House Gardens and Martin's Hill, covered in the planning application TVIA (CD1.54) as viewpoints 26, 10, 11, 15 and 16. I note that paragraph 5.3 of the LPA's Statement of Case (CD10.1) state that the BTCAAP should have very limited weight, as it has been superseded by the LBoB Local Plan and London Plan.

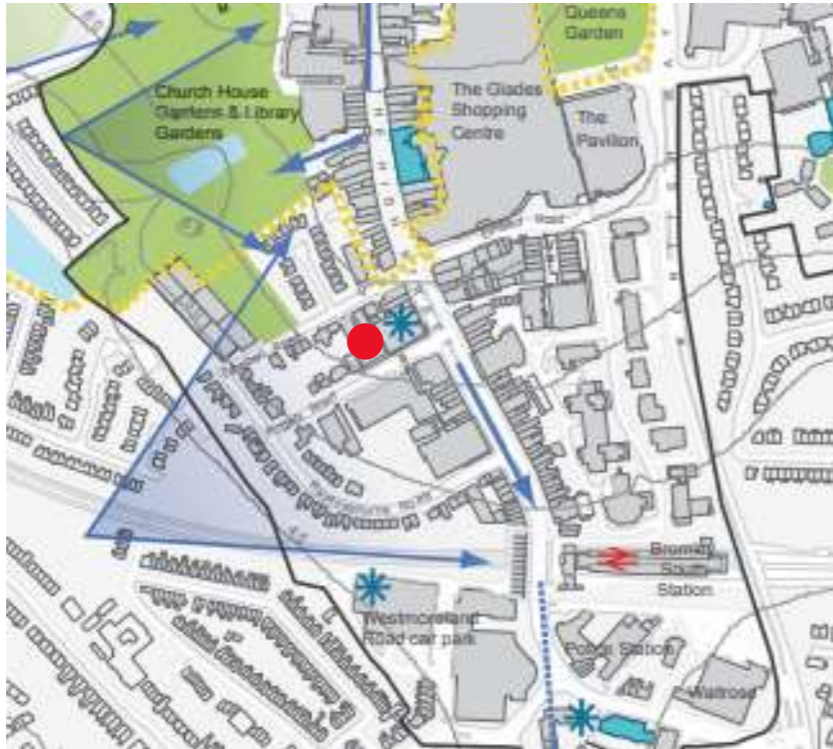


Image 4-9: Extract of BTCAAP Diagram 4.3 Views and Protected Sites, with views indicated by the blue arrows and the Site schematically illustrated by the red dot.

4.34 The Bromley Town Centre SPD (CD5.2) does not identify any specific views towards the Site. The Bromley Town Centre Conservation Area Statement (CD5.5) does not identify any 'key views' towards the Site, as demonstrated by the following extract of Figure 10 from the published document.

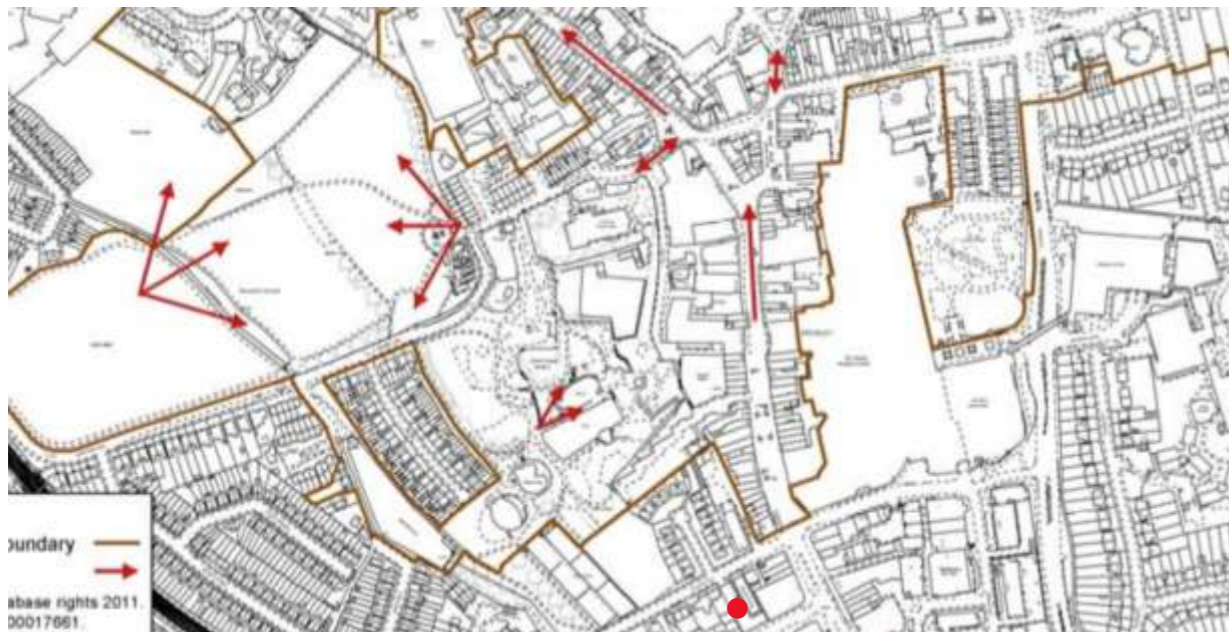


Image 4-10: Extract of the Bromley Town Centre Conservation Area Statement with the key views indicated by the red arrows and the Site schematically illustrated by the red dot.

4.35 With reference to the following image in RH Appendix I, the planning application Zone of Theoretical Visibility (ZTV) for the Proposed Development has been updated to include 66-70 High Street and the Laura Ashley extension.

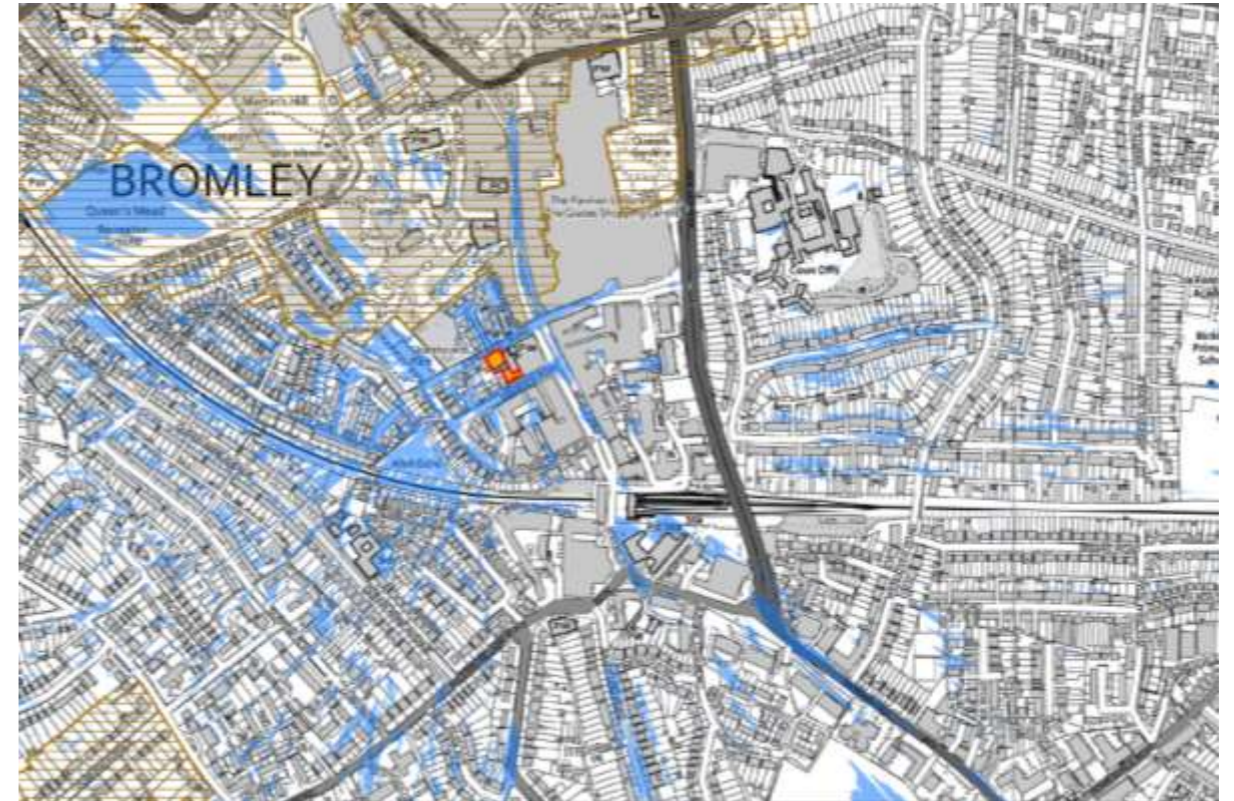


Image 4-11: Extract of the updated Zone of Theoretical Visibility.

4.36 The ZTV demonstrates that the theoretical visibility of the Proposed Development (illustrated by the blue hatching) is concentrated to within close proximity to the Site, covering Ethelbert Road, Ringers Road, Ravensbourne Road and the High Street. The theoretical visibility is then very limited from the remainder of the townscape to the north and east of the Site, with the main concentration of theoretical visibility reflecting the alignment of the Ravensbourne Valley, to the south, west and north-west of the Site.

4.37 From the fieldwork, the existing buildings within the Site (and therefore the Proposed Development) are visible at close range, from along the local road networks. The Site is seen in the context of varied building styles as demonstrated by Images 4-3 and 4-4, with the composition of views channelled due to the alignment of the local roads, with the extent of views either truncated by the more elevated High Street or extending westwards across the residential suburbs.

4.38 From the lower lying parts of Ethelbert Road all the existing buildings appear elevated above one's line of sight and there are already notable changes in scale between the TK Maxx building and the café, as well as inter-visibility with the Crest Building. This will continue to be the case with the implementation of 66-70 High Street, as demonstrated by the following extracts of the rendered views from that planning application, which shows the change in scale and building heights between the 66-70 and the café.



Image 4-12: Rendered view along Ethelbert Street illustrating the change in scale and varying building heights between 66-70 and the café and Salvation Army Church and Community Centre.

4.39 Similarly, all existing buildings appear above one's line of sight from lower lying parts of Ringers Road, with existing changes in scale of buildings between TK Maxx and the Site, as well as the Crest Building and adjacent two storey buildings. This will continue to be the case with the implementation of 66-70 High Street, as demonstrated by the following extract of the rendered views for that application.



Image 4-13: Rendered view from Ravensbourne Road looking along Ringers Road, with 66-70 High Street visible.

4.40 Similarly, as one travels along these roads, the sequential experience of views results in the perceived merging of existing buildings due to changing angles of views. It is therefore entirely possible to see buildings at close range which 'combine' in terms of massing, despite gaps between their building footprints, as per the following example of Henry House and William House (the Crest Building), where the angle of view negates the 6m gap between the two buildings and they appear as one building and mass as demonstrated by the following view from along Ringers Road.



Image 4-14: View from along Ringers Road, where Henry House and William House 'merge' despite their being a 6m gap between them, to present the perception of one building form.

4.41 From within Church House Gardens, there are views towards the Site from the south-west edge of the gardens, in proximity to Ethelbert Road. From elsewhere within the gardens, the extent of vegetation, including evergreen trees screens views towards the Site as demonstrated by the ZTV, with channelled views or highly filtered views from the southern edge of the gardens, as demonstrated by the following image, in which views are largely screened by the evergreen trees, but the upper part of the Crest Building, beyond the Site is just discernible.



Image 4-15: View from the southern edge of the Church House Gardens (VuCity Location P, RH Volume 1)

4.42 From the northern part of the High Street, there is the potential for a taller buildings at the Site to be visible, due to the lower height of buildings along the High Street and at the junction with Elmfield Road. The composition of these views already includes the taller buildings of the Crest, set back from the High Street, which already demarcates a change in building heights between the High Street and the surrounding streets, as will be with 66-70 High Street, as demonstrated by the following rendered image.



Image 4-16: Rendered view from the northern part of the High Street, looking south, with the 66-70 High Street scheme visible

4.43 From the southern part of the High Street, the existing buildings are similarly not visible until in very close proximity to the junctions with Ethelbert Road and Ringers Road. The composition of views towards the Site is already demarcated by the taller massing of the Crest Building and Tk Maxx on the eastern and more elevated parts of Ringers Road and Ethelbert Road, as will continue to be so with 66-70 High Street and the Laura Ashley extension.



Image 4-17: Rendered view from the southern part of the High Street, looking north, with 66-70 High Street visible above the Tk Maxx building, along with the upper part of the Crest building visible on the left of the image.

4.44 From the wider townscape, the planning application TVIA (CD1.54) sets out the varied visibility towards the Site due to the combination of intervening vegetation and buildings, along with the alignment of the local road networks. There are views of tall buildings in proximity to the Site from lower lying land to the north-west and west of the Site, including Queensmead, as demonstrated by the following rendered image, which includes 66-70 High Street, the Churchill Theatre and St. Marks Tower.



Image 4-18: View from Queensmead, with the Churchill Theatre left, 66-70 High Street central and St. Marks left.

4.45 At greater distance from the Site, beyond 4km, Bromley town centre is visible from public spaces situated across elevated landform, including Norman Park (illustrated below) and Crystal Palace Park. From these locations, there are panoramic views, with views towards the Site including St. Marks Tower and The Crest Building, and which will include 66-70 High Street.



*Image 4-19: Extract of planning application TVIA Viewpoint 32, from Norman Park, with St. Marks Tower and the Crest building visible on the centre left of the image.*

#### **Visual Summary**

4.46 In close range views, the existing buildings within the Site are visible from along Ringers Road, Ravensbourne Road, Ethelbert Road and Ethelbert Close. These existing buildings are seen as part of the varied building styles which extend across landform which falls from the High Street to Ravensbourne Road. The composition of views is channelled due to the alignment of these roads, with the extent of views either truncated by the more elevated High Street or extending westwards across the residential suburbs. Neither of the existing buildings exhibit a visual interest due to their form and lack of architectural detailing. As one travels along these roads, the sequential experience of views results in existing building forms merging due to changing angles of views. Buildings at close range which 'combine' in terms of massing, despite gaps between their building footprints, such that they appear as one building and mass.

4.47 In mid-range views, particularly to the west of the town centre, the more undulating pattern of landform enables a greater visibility of buildings across the town centre. The composition of the view consists of a consistent scale of residential properties in the foreground, with taller massing in the background of

the view, in the town centre. This includes the Mall Tower, the Churchill Theatre and Crest Building, which extend above the skyline, such that views towards the Site are already characterised by tall buildings forming the background of the view, and will continue to do so with 66-70 High Street.

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

## 5.0 THE PROPOSED DEVELOPMENT

5.1 With reference to the drawings for determination and the Design and Access Statement, the Proposed Development consists of two buildings, Block A and Block B, along with a connecting internal courtyard.



Image 5-1: Extract of the Design and Access Statement illustrating Block A (left) and Block B (right).

### Block A

5.2 With reference to the above extracts of the DAS Addendum (CD1.61), Block A, adjacent to Ringers Road, would extend up to 12 and 14 storeys in height, dropping down in height towards the High Street. The building façade would be unified by the use of red brick.

5.3 The lower storeys would be delineated via a series of concrete columns, with the tallest part of the concrete columns reflecting the height of the adjacent buildings at Simpson Place (to the west of the Site), before mirroring the building form by stepping down in height towards the High Street. Other detailing across the lower storeys is provided by vertical metal adjacent to the windows and the extent of the glazed frontage. In combination with the co-working space in the south-east corner of Block A, this will provide an active frontage, via the engagement between Ringers Road and the building.

5.4 The middle storey of Block A would be delineated by the vertical alignment of windows and inset balconies, with the upper storeys delineated by the inset brick panels and windows. The building façade would therefore provide a clear definition between the lower, middle and upper parts of the building, as well as delineating between the co-working spaces and residential parts of the building. This also

ensures the building is not perceived as 'top heavy'. There would also be green roofs atop both parts of the stepped roof alignment.

### Block B

5.5 Block B, adjacent to Ethelbert Road, would extend up to 10 and 12 storeys in height, dropping down in height away from the High Street. Like Block A, there would be a unifying use of red brick across the façade.

5.6 The lower storeys would consist of concrete columns which mirror the form of the building by stepping down in height along Ethelbert Road. The lower storeys are defined by the extent of windows, with a co-working space and a bicycle café on the ground floors, resulting in an active frontage.

5.7 The middle storeys would have a symmetrical arrangement of vertical windows across the central part of the façade, with increased windows and inset balconies across the façade sides. The upper storeys of Block B would be delineated by the red brick panels and the change in window alignment. Like Block A, there would be a clear delineation between the lower, middle and upper parts of the façade and no perception of 'top heavy' building. Similarly, there would be green roofs atop of Block B.

### Internal Courtyard

5.8 The internal courtyard provides a link between Block A and Block B, along with new planting, seating and a water feature.



Image 5-2: Extract of the Landscape Plan, illustrating the internal courtyard.



## 6.0 RESPONSE TO REASON FOR REFUSAL 3

6.1 The following section sets out my response to the townscape and visual matters of RfR 3 and should be read in combination with the updated VuCity and CGI images (**RH Volumes I and II**). The relevant aspects of the RfR are set out in bold text, followed by my response.

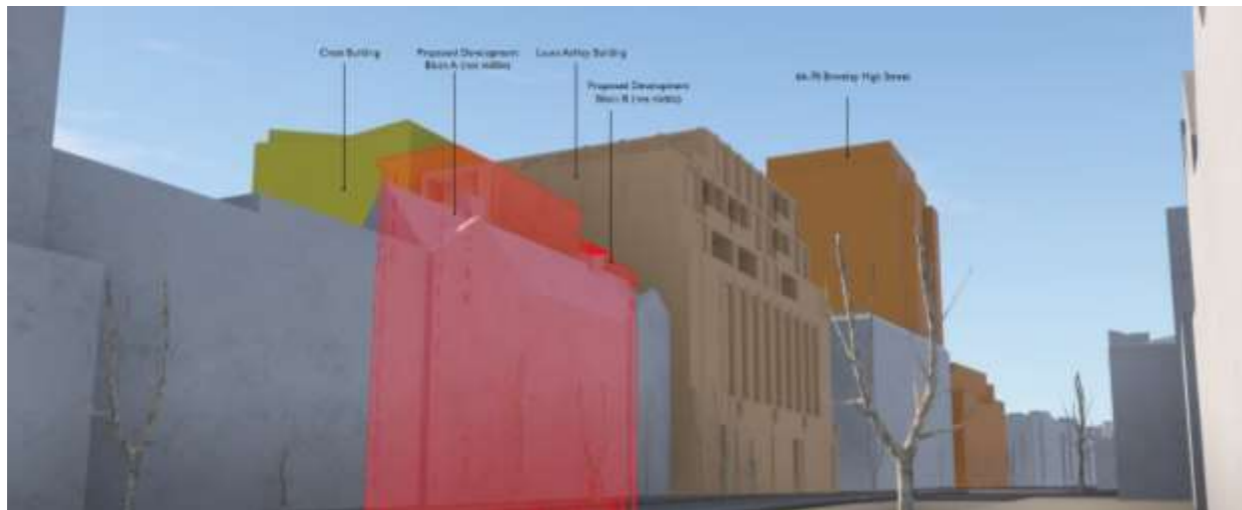
**The proposal would appear as an overly dominant and overbearing addition to the town centre skyline and out of context with its immediate surroundings**

### Town Centre Skyline

6.2 The Proposed Development would neither appear as an overly dominant nor an overbearing addition to the town centre skyline, nor would it be out of context with its immediate surroundings.

6.3 In respect of the town centre skyline, as demonstrated by the ZTV (Image 4-11) the close range theoretical visibility of the Proposed Development would be focused mainly to along the High Street and lower lying land to the west and north-west of the Site.

6.4 From the southern part of the High Street, the Proposed Development would not be visible, due to being screened by the intervening buildings, including the Crest Building (Henrey House and William House) and the extension to Laura Ashley, as demonstrated by the following extract of View F (**RH Volume I**), where the Proposed Development is screened, as illustrated by the red hatch.



*Image 6-1: Extract of View F, from the southern part of the High Street, demonstrating the Proposed Development (red hatch) is not visible.*

6.5 From the northern part of the High Street, the central and upper parts of the Proposed Development would be visible, due to extending above the intervening lower height buildings on the High Street, as demonstrated by the following extract of View O (**RH Volume I**).



*Image 6-2: Extract of View O, from the northern part of the High Street.*

6.6 Within this view, the town centre skyline will be demarcated mainly by 66-70 High Street, with the Proposed Development lower in height, such that it is evidently well below the upper parts of 66-70 High Street. The angle and orientation of the view, along with the foreshortening of the existing building in the foreground also results in the Proposed Development being seen at an equivalent height as taller buildings on the High Street. With the Proposed Development being seen as lower in height than 66-70 High Street, it provides a clear visual indication to the sloping topography which extends to the west of the High Street and a positive visual response to the underlying pattern of landform.

6.7 The Proposed Development would therefore not be overly dominant due to being below the height of 66-70 High Street and in a part of the composition of the view already demarcated by the taller buildings of Henry House and William House. There is also a clear visual separation between the Proposed Development and the Churchill Theatre in the foreground of the view (right of image 6-2). The Proposed Development would similarly not be overbearing, as it would integrate into the skyline to form part of the cluster of buildings, based around 66-70 High Street, which step up from the Laura Ashley extension (left of image 6-2), to 66-70 High Street, before stepping down in height across the Proposed Development and to the High Street. This cluster would have a similar visual linkages, e.g. via their flat roof profiles.

6.8 Moving to the west of the of the Site, the following extract of View C (**RH Volume I**) is located at the railway bridge crossing and is a viewpoint location identified in the BTCAAP, but without the vegetation bordering the railway, nor the fencing across the bridge.



Image 6-3: View from the railway bridge crossing.

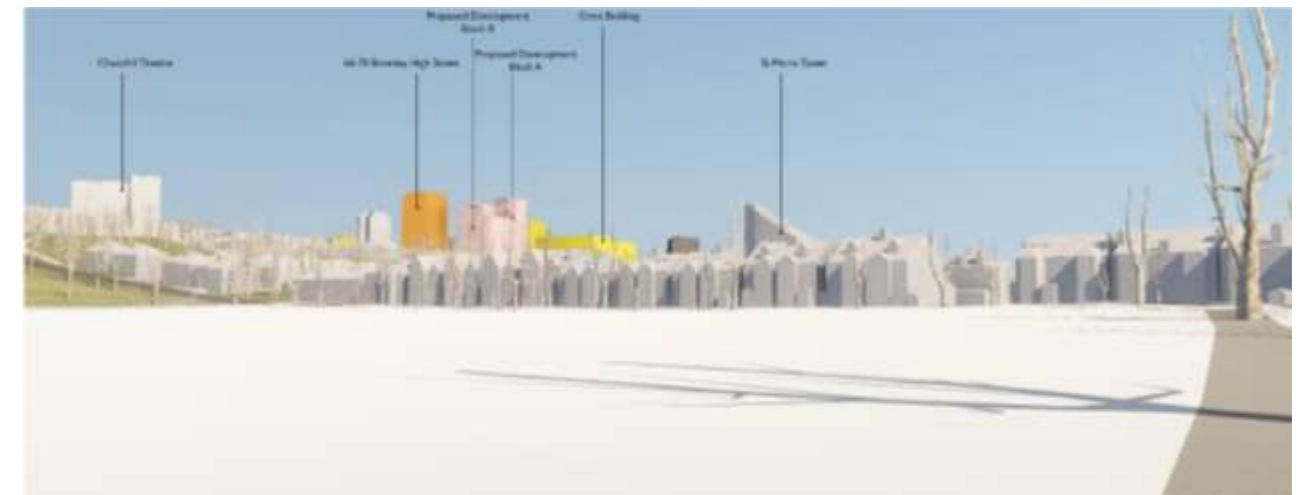


Image 6-4: Extract of View E, from Martins Hill recreation ground (Queensmead).

- 6.9 Both Block A and Block B would be visible, although seen through the mesh fencing across the railway bridge (not illustrated in the image). Block A and Block B would provide visual interest to the view, by reflecting the rhythm of building heights which exists between the Crest Building and 66-70 High Street, the latter of which would back-cloth the Proposed Development. The distance between Blocks A and B would enable visual permeability through the Proposed Development and on the skyline, avoiding any perceived merging with 66-70 High Street.
- 6.10 The stepped arrangement to the upper stores of Block A and Block B would reduce the perceived massing of these parts of the building. Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from 66-70 High Street to the Crest Building such that visually they would form a consolidated cluster of buildings within the view. This would negate the Proposed Development being overly dominant or an overbearing addition to the skyline.
- 6.11 Moving to the north-west of the town centre, the following extract of View E (**RH Volume I**) is located at Martin's Hill recreation ground, Queensmead.

- 6.12 Within this view, the Proposed Development would be visible, seen as part of a cluster of taller buildings across the lower lying and rising landform within the town centre. These buildings include St. Marks Tower, the Crest Building and 66-70 High Street.
- 6.13 The Proposed Development would not be overly dominant because it would remain below the height of 66-70 High Street and would be back-clothed in part by the Crest Building. The Proposed Development would not be an overbearing addition to the skyline because it is located within this cluster of existing buildings, and the stepped form of Blocks A and B would reduce the visual perception of their overall scale and mass, as well as provide additional visual interest and variety to the skyline.
- 6.14 The image also demonstrates that the Proposed Development would be seen as lower in height than the Churchill Theatre (left of image) and that there is a clear visual separation from the Proposed Development with the visual setting of the Theatre and relationship to the remainder of the town centre skyline retained.
- 6.15 Moving to the north-west of the Site at Mill Vale Road, and the following extract of View N (**RH Volume I**), the Proposed Development would not be visible on the skyline, due to the intervening buildings.



Image 6-5: Extract of View N, from Mill Vale Road.

6.16 From the north-west of the Site, and more elevated parts of St Martins Hill recreation ground, the following extract of View A (RH Volume I), illustrates that the Proposed Development would be visible.



Image 6-6: Extract of View A from St Martins Hill recreation ground.

6.17 The upper storeys of Block A and the upper storeys and western façade of Block B would be visible, with the remainder of the Proposed Development screened by the intervening buildings.

6.18 The Proposed Development would be seen below the height of 66-70 High Street and as part of a skyline extending between St Marks Tower and 66-70 High Street. These three buildings would provide visual

interest via their varied roof profiles, with the stepped arrangement of Block B aiding in reducing the perceived visual mass and scale of the building.

6.19 The Proposed Development would therefore not be an overbearing addition to the skyline because it is located within the alignment of existing tall buildings, with clear visual separation between them, such that there would be no perceived merging or overdominance of buildings on the skyline.

6.20 Of note, the rendered image depicts the intervening vegetation as not in leaf, such that in summer months, the Proposed Development would not be visible, due to the vegetation being in leaf.

Town Centre Skyline Summary

6.21 From the above analysis of views of the town centre skyline, the visibility of the Proposed Development would vary between not being visible due to intervening buildings, partly visible or visible in most of entirety.

6.22 Within all the views where the Proposed Development would be visible, it would be seen as either an integrated part of a cluster the existing buildings Henry House and William House, (which will be further reinforced by 66-70 High Street), or as part of a varied skyline of tall buildings extending between St Marks Tower, Henry House, William House and to 66-70 High Street.

6.23 The Proposed Development would provide additional visual interest to this skyline via the stepped form of Blocks A and B. With the Proposed Development remaining below the height of 66-70 High Street and the space between Blocks A and B providing visual permeability through the Proposed Development, the perceived height of the Proposed Development would be reduced and the Proposed Development would neither be overly dominant nor an overbearing addition to the town centre skyline.

6.24 The Proposed Development would also not alter views towards the Churchill Theatre and would be seen as being below its height.

Context of the immediate surroundings

6.25 As set out in the previous townscape baseline, the immediate surroundings to the Proposed Development are varied in terms of architectural styles, with both taller and lower height buildings along Ethelbert Road and Ringers Road.

6.26 Both roads are relatively wide, with both Ethelbert Road and Ringers Road having more than 18m between buildings on either side of the road. Therefore the street pattern and building alignment is not inherently over-bearing, nor is there a ‘canyoning’ effect when walking along the roads.

6.27 66-70 High Street will provide a notable change in scale from the adjacent single storey café and Salvation Army Church and Centre, as demonstrated by the following section; similarly, the Crest

Building already provides a notable change in scale from the two storey and single storey buildings on the southern side of Ringers Road.

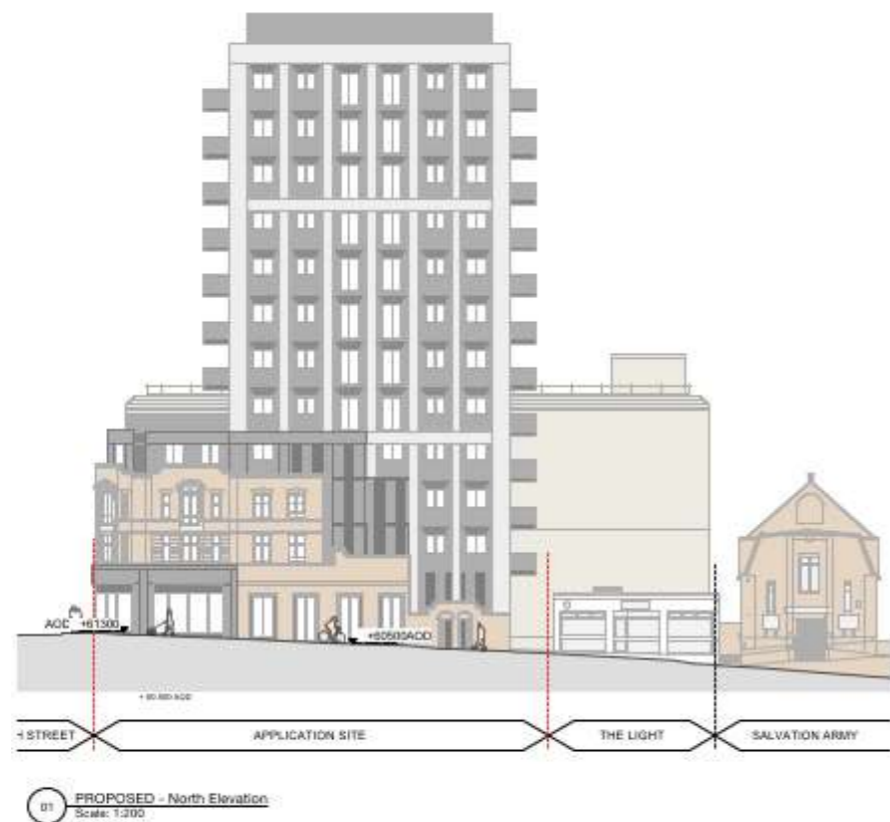


Image 6-7: Section showing the change in and height between 66-70 and the café and Salvation Army Church and Centre on Ethelbert Road.

6.28 I note from the Inspector’s decision for 66-70 High Street that it would be:

*“an obvious presence and be a direct contrast to its prevailing scale, to which it owes much of its significance. Again however, as a tall building, that’s largely the point” (66-70 Appeal decision, paragraph 16, CD7.1)*

6.29 The Proposed Development would similarly result in an obvious presence on Ringers Road and Ethelbert Road and have a direct contrast with the prevailing scale of adjacent two storey and four storey buildings, but this is the existing character of the townscape and visual context of Ringers Road and Ethelbert Road.

6.30 From the High Street, the perception of the Proposed Development would be that it is at a lower topographic position in the townscape than buildings on the High Street, and that the change in scale between Block B and the Salvation Army Church and Centre would be less than that of 66-70 High Street, as demonstrated by the following extract of View H (RH Volume I).

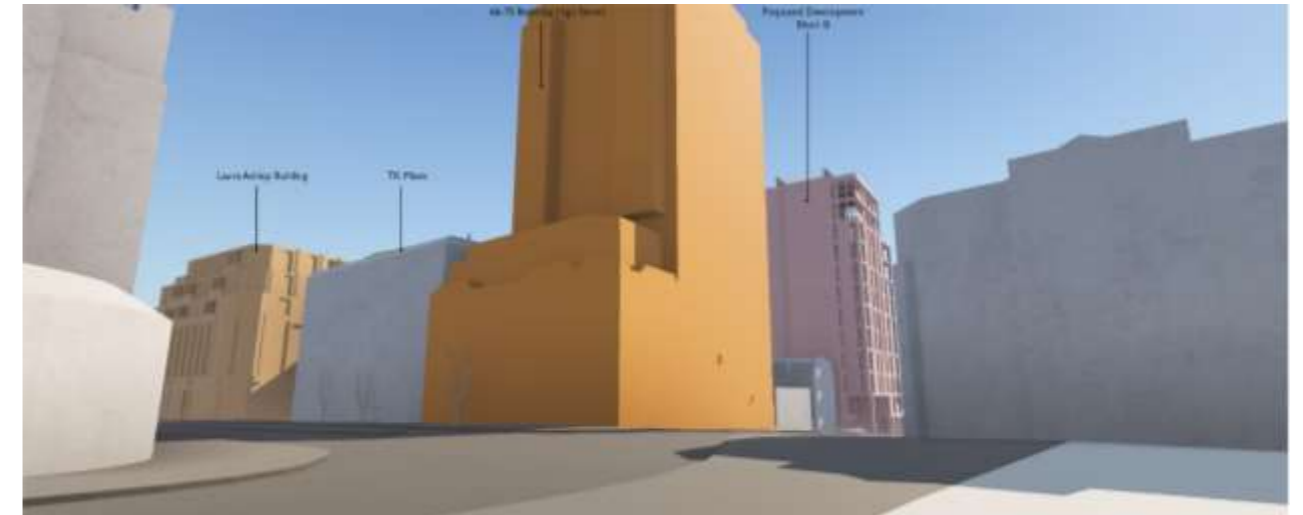


Image 6-8: Extract of View H, from the High Street

6.31 Also from the High Street, adjacent to Ringers Road, the following extract of View I demonstrates that the Block A would be taller than the intervening Tk Maxx building (right) and the extension to Laura Ashley (left), but Block A would be stepping up in scale like the Crest Building, to mirror the pattern of larger scale buildings on the more elevated parts of Ringers Road, but set back from the High Street.



Image 6-9: Extract of View I (RH Volume II) from the High Street looking along Ringers Road.

6.32 With reference to the following extract of View B (**RH Volume I**), from the southern parts of Church House Gardens, in proximity to Ethelbert Road, the Crest Building (yellow) already defines contrasts in scale with lower height residential properties. This will be reinforced by 66-70 High Street.



Image 6-10: Extract of View B, from the southern part of Church House Gardens, adjacent to Ethelbert Road.

6.33 With reference to the above image, the scale and mass of the Proposed Development is reduced by the delineation between the lower, middle and upper parts of the building, as well the intervening distance between Block A and Block B and their differing façade treatment.

6.34 Similarly, the scale and mass is reduced from along Ethelbert Road, where the immediate context of the Site is also St Mark's Tower, such that the composition of views is of a lower height townscape framed by the taller buildings.



Image 6-11: Extract of View G, from the western part of Ethelbert Road.

6.35 From other southern parts of the Church House Gardens the Proposed Development would either be screened by the density of existing vegetation, which includes evergreen species, or glimpsed through small gaps in the vegetation cover, as demonstrated View P (**RH Volume I**).

Context of the Immediate Surrounds Summary

6.36 In combination with the height of the Crest Building to the south of the Site and the future context of 66-70 High Street to the east of the Site, the Proposed Development would not be out of context with its immediate surrounds. This is because the existing buildings and 66-70 High Street denote a notable change in scale from adjacent properties and this in turn is the character of the Site's immediate context, as part of varied townscape where buildings of differing architectural styles, heights and forms are all juxtaposed to one another.

6.37 The experience of immediate surrounds from the High Street, roads and parts of Church House Gardens will not adversely change with a result of the Proposed Development, because the Proposed Development reflects the existing townscape pattern and adds to this via its own building form, detailing and interest to the streetscape.

**The proposed development would therefore cause harm to the character and appearance of the area**

6.38 The Proposed Development would not cause harm to the character and appearance of the area. I have set out a revised townscape and visual assessment in **RH Appendix II**, which in summary predicts a range of low tier beneficial effects to the existing townscape character and people's views.

6.39 At the Site level scale, the Proposed Development would replace existing buildings with higher quality architectural buildings which provide visual interest, a higher scenic quality and active frontages.

6.40 In relation to the published landscape (townscape) assessments, the Proposed Development would be very small in scale in relation to their wider geographic areas. In addition, with the Proposed Development being located in the town centre and in proximity to taller buildings in the townscape, there would be no change to the character of the published assessments.

6.41 At a more local scale, the Proposed Development would be located in Bromley Town Centre SPD character area Bromley West and sub-area High Street. SPD paragraph 7.14 notes that the character of the High Street is an eclectic mix of architecture, with no single definitive architecture style and that:

*“development proposals should seek to reference aspects of the surrounding context to inform an appropriate design language. Materiality and architectural detailing is key in this regard, taking cues from local character and context to ensure that new development does not appear unrelated or alien within the streetscene.”*

6.42 The Proposed Development has referenced aspects of the surrounding context, materiality and architectural detailing e via the use of red brick, a flat roof line and clear delineation of the lower, middle

and upper parts of the facades. The Proposed Development also decreasing the height of Block B away from the High Street to reflect the underlying pattern of landform and creates a rhythm of building form and scale between the Proposed Development, the Crest Building and 66-70 High Street to ensure its successful integration within a cluster of existing taller buildings.

6.43 In respect of the SPD key characteristics for the High Street sub-area, the Proposed Development would be taller than the prevailing building heights, but would be consolidated to an area of tall buildings within the sub-area. The Proposed Development would also be perceived as lower in height than the Churchill Theatre, as demonstrated by the previous extracts of Views E and O and set lower in the townscape in comparison to 66-70 High Street.

6.44 The sub-area has a stated development potential of ‘medium to high’, which demonstrates that the townscape sensitivity of the sub-area is inherently low and able to accommodate change more readily than other parts of the town centre. The combination of this low sensitivity with the high quality of the Proposed Development and that it is located in a part of the sub-area where there are tall buildings, results in no harm to the character and appearance of the area.

6.45 In respect of people’s views, just because the building is visible, does not mean there is visual harm. This point was noted by the Inspector’s decision for 66-70 High Street, with paragraph 15 stating:

*“Just because something may be visible however, it does not automatically follow that it would be harmful.”*

6.46 At close range to the building, the reality is that people look ahead of them, rather than walk looking upwards. It is the lower floors of the buildings which are more pertinent to the potential visual effect, rather than the height of a building. This is reflected in the Bromley Town Centre SPD (CD5.2), which notes in paragraph 7.20 that *“careful consideration should be given to how larger block are experienced at ground level and perceived in townscape terms.”*

6.47 Both Block A and Block B exhibit interesting facades, via the use of brick, glass, concrete and metal detail, with active frontages created by the internal workspaces, as demonstrated by the following CGI (RH Appendix II).



Image 6-12: CGI of the lower floors of Block B adjacent to Ethelbert Road

6.48 From along Ethelbert Road, the previous extract of View G demonstrates that the Proposed Development would be in a more elevated position in the townscape in relation to the road users, visitors to Church House Gardens and residents, as would 66-70 High Street. This is inevitable given the pattern of underlying landform and similarly, when on the High Street, looking back towards Block B, the Proposed Development is seen as stepping back down Ethelbert Road, as demonstrated by View H.

6.49 The LBoB Statement of Case (CD10.1) suggest Blocks A and B would ‘coalesce’ from along Ethelbert Road and read as a single mass. With reference to the following extract of View J, there is inevitably a point at which when travelling along Ethelbert Road, the orientation and foreshortening of the view towards the Site will reduce the visible gap between Blocks A and B. However, they will not be perceived as a single mass due to their differing facades and the permeability from the balconies on Block A.

6.50 The Proposed Development will also not coalesce with 66-70 High Street due to the permeability across the lower storeys of Block B and the differing building facades, as demonstrated by the following CGI.



Image 6-13: Extract of View J (RH Volume II), from Ethelbert Road.

6.51 When viewed from Ringers Road, the Proposed Development would be seen adjacent to the Crest Building and part of the taller buildings in the more elevated parts of Ringers Road. The gap between Blocks A and B would enable visual permeability and views of 66-70 High Street, as demonstrated by the following CGI from Ringers Road (RH Volume II).



Image 6-14: Extract of CGI along Ringers Road, with 66-70 High Street (the light red hatch) visible beyond the Proposed Development.

6.52 In longer distance views, the previous extracts of images illustrating the potential changes to the skyline demonstrate the visibility of the Proposed Development would provide additional visual interest via the stepped form of Blocks A and B and remain below the height of 66-70 High Street. The Proposed Development would be a small addition to the composition of views and would not adversely affect the identified visual receptors due to being seen as an integrated part of the skyline, which in turn reduces the perceived height of the Proposed Development.

**The Proposed Development is contrary to London Plan Policies D1, D3, D4, and D9**

London Plan Policy D1: London's form, character and capacity for growth

6.53 The Proposed Development is not contrary to London Plan Policy D1. This is because the Proposed Development has assessed the existing character, urban form, historical evolution, topography, land uses and landmarks as set out in Policy D1 Part A.

6.54 The existing character is one of varied architecture and where tall buildings are already located on the more elevated parts of Ringers Road and Ethelbert Road and set back from the High Street. The Proposed Development is consolidated to this existing pattern of tall buildings, which similarly already denote a change in scale from surrounding High Street and residential buildings.

6.55 As the townscape has a varied urban form and the streetscape along Ringers Road and Ethelbert Road is varied, there is no dominant form to which the Proposed Development has to respond. The Proposed Development ensures level access, so as to avoid the clutter of external steps and ramps exhibited by many properties surrounding the Site. Both Block A and B provide active frontages at ground level, via the co-working use within the building and cycle café.

6.56 In respect of the historical evolution and heritage assets, this is covered by Mr. Froneman, who concludes that the Proposed Development would not result in harm to the Bromley Town Centre Conservation Area.

6.57 The stepped arrangement of Block B responds to the underlying pattern of topography. The stepped arrangement of Block A is an intentional design contrast to the form of Block A, to provide visual interest, focusing the alignment of Block A towards the High Street, rather than away from it and avoids a uniform building profile across Blocks A and B.

6.58 As set out in townscape and baseline section, the Site is not part of any identified 'landmarks' or 'major ridgelines' within Bromley.

6.59 Therefore, from the above, I suggest that the Proposed Development accords with the Policy D1 requirements.

London Plan Policy D3: Optimising site capacity through the design-led approach

6.60 The policy sets out that development must make the best use of land, with the design-led approach determining the most appropriate form for development in relation to its context. As set out in the review of the Proposed Development and with reference to the Design and Access Statement and Addendum, the Proposed Development has been through an iterative process, including for review from the Design South-East Panel.

6.61 In respect of the stated policy objectives for 'form and layout', the Proposed Development would enhance the streetscape in comparison to the existing buildings at the Site. This is via the active frontages, materials and detailing via the brick, concrete and vertical metal. The layout and orientation of Blocks A and B mirrors the linear street pattern of Ringers Road and Ethelbert Road, with the height and scale reflecting the tall building context of 66-70 High Street and the Crest Building. The Proposed Development is physically lower in the townscape than 66-70 High Street, and therefore ensures a hierarchy between with this building which is located at the interchange between Ethelbert Road and the High Street.

6.62 As demonstrated by Image 6-12, the entrances to the Proposed Development would be legible and are aligned with the movement patterns along Ethelbert Road and Ringers Road, as they do not obstruct the existing footways, as demonstrated by the ground floor plan, which shows the entrances set back from the pavements, such that the movement patterns are preserved.



Image 6-15: Extract of the Architectural Ground Floor Site Plan\_R8

6.63 As set out above, the ground floors of Blocks A and B would provide active frontages in accordance with the policy requirements of 'experience'. I also note there is no RfR based upon London Plan Policy 8: Public Realm, thereby demonstrating the streetscene and public interface between the Proposed Development and the adjacent streets is acceptable.

6.64 In respect of the policy requirements for 'quality and character', there are no unique or special and valued features at the Site in townscape and visual terms. This is supported by the Bromley Town Centre SPD (CD5.2) which identifies that the Site is in area of medium to high development potential, and further reflected by the Site being part of Site 10. The notable features in the context of the Site are the Bromley Town Centre Conservation Area, to which no harm is predicted by Mr. Froneman, and the Churchill Theatre, for which the Site is physically distant and would not impact views towards it, by remaining below its height.

6.65 In respect of urban greening, the combination of the green roofs and internal courtyards enable a positive UGF score of 0.47 (CD.1.66).

6.66 I consider the Proposed Development is high quality for the reasons set out in chapter 5, including via the use of attractive, robust materials which will weather well and the detailing, via differing materials and varying brickwork.

6.67 Therefore, from the above, I suggest that the Proposed Development accords with Policy D3 requirements.

London Plan Policy D4: Delivering good design

6.68 The Design and Access Statement and addendum set out the iterative design process for the Proposed Development, which has included visual assessments and a Tall Building Study (CD1.54 Appendix 5) to aid in informing the scale and height of the buildings, to accord with policy section B.

6.69 The Proposed Development has been subject to a design review panel, following which the design recommendations of ensuring the Proposed Development would be below the height of the Churchill Theatre were incorporated, as demonstrated by Image 6-4. The Proposed Development therefore accords with policy section D and E.

6.70 The design quality of the Proposed Development can be maintained via suitable conditions to accord with policy section F.

6.71 From the above, I suggest that the Proposed Development accords with Policy D4.

London Plan Policy D9: Tall Buildings

6.72 In policy terms, the Proposed Development is not identified as a specific location for a tall building; but is both adjacent to one (66-70 High Street) and in a part of the townscape identified as an opportunity area (Site 10). The reality on the ground is that the Proposed Development is located adjacent to taller buildings via 66-70 High Street, the Crest Building and the Laura Ashley extension, which in combination with the Bromley Town Centre SPD (CD5.2) stated 'medium to high' development potential is considered to enable the Site to accommodate tall buildings.



- 6.73 The impacts of the Proposed Development have included the visual impacts, with 36 viewpoints and associated visual receptors included in the planning application. This visual assessment accounts for views of the Proposed Development from different distances (long range, mid-range and immediate views).
- 6.74 The Proposed Development is assessed as not resulting in adverse townscape and visual effects and would therefore not result in harm to the townscape character and visual amenity. The Proposed Development would integrate successfully with the group of existing tall buildings (66-70 High Street and the Crest Building), as well as aid legibility in the townscape via the stepped alignment of the roofscape.
- 6.75 The cumulative impact of the Proposed Development with other schemes across the town centre was assessed in the planning application TVIA, as well as the Proposed Development in its own right.
- 6.76 From the above, I suggest that the Proposed Development accords with the relevant townscape and visual matters of Policy D9.

**The Proposed Development is contrary to Local Plan Policy 37, 47, 48 and Site Allocation 10**

Policy 37: General Design of Development

- 6.77 The supporting text to Policy 37 sets out that the Council wish an attractive townscape, such that new development makes a positive contribution to the area.
- 6.78 Part A of the policy requires development to be imaginative and attractive. In this respect, I consider that the Proposed Development accords to the requirements by enabling two buildings, Blocks A and B to have their own identity, as well as shared architectural style, with the interplay between the two buildings created by their varying heights and contrasting roof profiles. The use of red brick is also a consistent material and a key material of the surrounding townscape.
- 6.79 As demonstrated by Image 6-12, the Proposed Development would contribute positively to the existing street scene by raising the design standards and creating active frontages. This is particularly pertinent given the condition and very low architectural quality of the existing buildings, as well as the general clutter along the streetscape via external ramps and stairs. The Proposed Development would also contribute positively to the skyline and identified views as set out previously, so as to accord with Part B of the policy.
- 6.80 The Proposed Development incorporates green roofs and new planting to achieve a positive UGF score, so as to provide opportunities for soft landscaping and enhancing bio-diversity in accordance with Part C of the Policy.
- 6.81 Therefore, from the above and the relevant townscape and visual matters, I suggest that the Proposed Development accords with Policy 37.

Policy 47: Tall and Large Buildings

- 6.82 Policy 47 requires tall and large building to make a positive contribution to the townscape and that their mass and scale enhances the surrounding area. As set out above, the architectural detailing, delineation of the facades, active frontages and stepped arrangement of the buildings would enhance the local character. This is supported by my prediction of beneficial townscape and visual effects.
- 6.83 The supporting policy text notes that potential for tall buildings may existing in town centre locations which benefit from good public transport and exhibit an existing local built character that would allow for taller buildings and where no harm would be caused by heritage assets.
- 6.84 The Proposed Development is evidently in a town centre location with a range of public transport in proximity to the Site. The Site is located in a local built character that would allow for taller buildings due to 66-70 High Street and the Crest Buildings.
- 6.85 Therefore, I suggest that the Proposed Development accords with Policy 47.

Policy 48: Skyline

- 6.86 As set out previously, the Proposed Development will be visible to varying degrees on the skyline.
- 6.87 The Proposed Development will protect the skyline because it will be located adjacent to 66-70 High Street in views from the west and north-west of the Site, such that it will be back-clothed by this building and seen in its immediate context. In many of the views, the Proposed Development will be seen below the height of 66-70 High Street. The Proposed Development will also not impact any views towards the Churchill Theatre and as demonstrated by the visual assessment, will not impact any of the 'key views' across Bromley.
- 6.88 The Proposed Development will also provide more visual interest to the skyline, through the stepped arrangement of Blocks A and B, which will function well in creating a unifying link between the Crest Building and 66-70 High Street. The Proposed Development can therefore be well integrated in the skyline and accords with Policy 47, as demonstrated by the following CGI (**RH Volume II**).



Image 6-16: Extract of RH Volume II, demonstrating taller buildings in the surrounding context of the Site, along with 66-70 High Street and the Laura Ashley extension (red hatch).

Site Allocation 10

6.89 The alignment of the Site 10 boundary covers Ethelbert Close to the north of the north of the Site, as well as properties to the west of the Site. The Site is therefore not at the boundary of Site 10 and the immediate transition with low rise development along the remainder of Ethelbert Road. In respect of Ringers Road, the existing buildings are of a taller height than surrounding two storey residential properties, such that the transition in scale between Block A and adjacent buildings is sympathetic. Similarly, the stepped form of Block B in relation to the underlying pattern of landform aids in the sympathetic change in scale along Ethelbert Road.

6.90 Whilst the Proposed Development will be a notable change in scale, in relation to the existing residential context, for the same reasons that 66-70 High Street was considered acceptable, I suggest that the Proposed Development is also acceptable to its context.

**The Proposed Development is Contrary to the Urban Design SPD, adopted July 2023**

6.91 The Proposed Development is not contrary to the Urban Design SPD (CD5.1), as the Proposed Development responds positively to the relevant overarching design principles, which are the stated

*'performance indicators'* of good design. I have set out a response to those relevant to townscape and visual matters.

1. Contextual (character and identity)

6.92 The Proposed Development is based on a sound understanding of its context via the information presented in the Design and Access Statement and supporting technical studies.

6.93 The Proposed Development would positively contribute to its setting and reinforce and enhance local identity through the use of materials and its proximity to the existing tall buildings, to form an integrated cluster of buildings.

2. Responsive (Architecture and Landscape)

6.94 The SPD notes that quality is measured by experience and appearance and that *"historically the juxtaposition of new buildings and spaces alongside the existing urban fabric demonstrates how traditional character and innovative design can coexist; with local identity highlighted rather than eroded by new interventions."*

6.95 The Proposed Development would relate well to the corresponding tall buildings at 66-70 High Street and the Crest Building. The transition in scale and height between the Proposed Development and lower height buildings on Ethelbert Road and Ringers Road would be less than the transition in scale between 66-70 High Street and the adjacent café. But, as set out above, the Proposed Development is part of that juxtaposition of new buildings and the smaller scale existing urban fabric, such that it would be both innovative and coexist with the local context.

6.96 Additionally, the SPD states that:

*"Bromley has a predominantly low-rise suburban character with a varied topography. Relating new development to the general pattern of building heights should not preclude variations in scale where conditions allow; however, retaining the continuity and respecting the qualities of local townscape character is a fundamental requirement."*

6.97 Given the proximity of the Site to existing tall buildings, I suggest that the conditions do allow for tall buildings at the Site and the Proposed Development has retained the continuity and respected the qualities of the local townscape character by being lower in the townscape than the Churchill Theatre and improving the design standards of Ethelbert Road and Ringers Road.

6.98 As part of this improvement, the delineation of the proposed facades and the active frontage on the lower storeys enables a *'human scale'* to the Proposed Development. As part of the human scale and movement through the townscape, the perception of the Proposed Development will vary. From many locations in close proximity to the Site, the Proposed Development will be perceived along with 66-70 High Street as a co-ordinated re-development to a part of Ringers Road and Ethelbert Road.

6.99 In conclusion, the Proposed Development reflects the SPD approach of ‘replace’, whereby it is a unique solution through the contemporary user of form, materiality and detailing, given the Site is in an area of inconsistent character and accords with the policies and requirements of Urban Design SPD for performance indicators of good design.

**The Proposed Development is Contrary to the Bromley Town Centre SPD**

6.100 The Proposed Development is not contrary to the Bromley Town Centre SPD (CD5.2) and would support the stated ‘vision’ for Bromley, via implementing a high quality development which would enhance the streetscape character through the improved public realm and active frontages of Blocks A and B. The Proposed Development would therefore respond positively to the SPD guidance note 2, via making a positive contribution to the existing townscape and character.

6.101 In respect of SPD Policy guidance note 10, the Proposed Development has followed a design led approach to ensure that Blocks A and B are appropriate in terms of their form through their stepped arrangement, their response to context and the high quality design.

6.102 SPD Paragraph 5.17 notes that tall buildings:

*“can provide important urban landmarks and much needed homes at increased densities. They can also facilitate wider regeneration benefits. However, due to their scale and prominence, tall buildings have the potential to significantly alter local character and impact on the setting of heritage assets and conservation areas, and impact negatively on local environmental conditions and amenity (micro-climate effects).”*

6.103 The SPD notes that existing prevailing heights in the area are ‘particularly important’ in determining suitable heights for new development proposals. As set out in the baseline summary, the building heights are varied in proximity to the Site, with two storey residential properties, up to the taller Henry House and William House, as well as 66-70 High Street. The Site is located in proximity to these taller buildings which define the eastern parts of Ringers and Ethelbert Roads.

6.104 In response to SPD paragraph 5.21, the Proposed Development is ‘grounded’ in its context via its articulation to the façade, the use of red brick, detailing and the active frontages. In combination with not impacting views of the Churchill Theatre, the Proposed Development therefore responds positively to SPD guidance note 11.

6.105 With reference to SPD guidance note 13, the Proposed Development includes new planting within the courtyard and via the green roofs, resulting in a positive UGF score and therefore a positive response to SPD guidance note 13.

6.106 The SPD sets out the varied characteristics of Bromley by reference to character areas and the small sub-areas. As set out previously in respect of the townscape character, the Proposed Development would be located in Bromley West and the sub-area of the High Street.

6.107 In respect of Bromley West, the stated development potential is “medium to high” with the character already defined by varying buildings heights, i.e. between the three to four storey High Street buildings and the taller Churchill Theatre (nine to ten storeys), for which SPD paragraph 7.3 notes that new development should:

*“respect the setting of the Churchill Theatre and Library, so as not to diminish its presence as a civic landmark building.”*

6.108 SPD paragraph 7.4 notes that with the site allocation 10 within most of Bromley West, development proposals will:

*“be expected to incorporate a sensitive design which respects the adjoining low rise development.”*

6.109 SPD paragraph 7.7 and 7.8 state:

*“The High Street has an established pattern of built form characterised by a lower well-structured urban edge (typically three to four storeys) with taller elements set-back behind. Taller blocks set behind lower finer grain buildings is a clearly distinguishable feature of this sub-area; the human scale feel of the High Street contributes to its unique character which should be retained and reinforced.*

*New development which includes taller elements should follow this pattern; ensuring the form and massing of the buildings is set back from the main High Street frontage and sensitive to the ridge profile of the town centre topography.”*

6.110 I suggest that the SPD is therefore acknowledging and accepting that a change in scale and building heights and forms between new development and lower rise residential properties will occur as a result of site allocation 10 and this is acceptable in principle.

6.111 I suggest that from the above the Proposed Development does retain and reinforce this character by being a taller ‘block’ set back from the High Street and with the active frontages to Block A and B providing a human scale feel to the buildings.

6.112 The Proposed Development is also sensitive to the topography by Block B stepping down in height along Ethelbert Road and respecting the landscape character of Church House Gardens, responding positively to SPD paragraph 7.21, which states:

*“Building heights should step down towards the north and south in response to Church House Gardens and Ethelbert Road. The relationship with Ethelbert Road should be carefully considered in order to avoid an abrupt transition in scale.”*

6.113 In terms of the transition in scale, in relation to the Proposed Development, this is less than the transition in scale between 66-70 High Street and the Café. I note that the guidance does not require building heights to step down in scale along Ringers Road.

- 6.114 Due to the above and in combination with 66-70 High Street, the Proposed Development would reinforce a sense of townscape continuity and coherent streetscape pattern, particularly given that Ringers Road and Ethelbert Road are streets with a varied urban pattern, character and identity.
- 6.115 In respect of SPD paragraph 7.25, the Proposed Development has incorporated green infrastructure into the public realm, via the courtyard, external planters and green roofs, with a resulting UGF positively in excess of the 0.4 guidance.
- 6.116 From the above, with the Proposed Development responding positively to the relevant SPD guidance notes and not impacting the key characteristics of the local character areas and sub-areas, the Proposed Development is not contrary to the Bromley Town Centre SPD and accords with its guidelines.

## **7.0 RESPONSE TO THIRD PARTIES**

- 7.1 From a review of the Third Parties representations, I consider that the relevant matters are addressed by the above responses to the RfR.

## 8.0 CONCLUSION

### Baseline

- 8.1 There are a variety of land uses surrounding the Site, resulting in a varied urban structure in terms of building heights, massing and architectural styles. In respect of Ringers Road and Ethelbert Road the street scene is varied and generally of low scenic quality, with access into buildings often demarcated by steps and ramps which provide additional clutter to the streetscape. Due to this, the architectural quality and streetscape of the townscape surrounding the Site is varied.
- 8.2 Taller buildings are interspersed across the High Street, with the Churchill Theatre in the northern part of the town centre, Henry House and William House ('the Crest Building') on the southern side of Ringers Road (opposite the Site) and the Mall Tower in the central part of the town centre, beyond The Glades. St. Marks Tower and Perigon Heights are in the southern part of the town centre.
- 8.3 In respect of townscape and visual matters, I consider that the context for the Proposed Development and the baseline for the townscape and visual assessment must also include 62 High Street (Laura Ashley) and its roof extension and 66-70 High Street, a 12 storey building on Ethelbert Road, to the east of the Site, as these are permitted schemes.
- 8.4 66-70 High Street will demarcate the eastern side of Ethelbert Road and result in a notable change in scale between the adjacent single storey café and Salvation Army Church and Centre, as well as two storey residential properties on the northern side of Ethelbert Road. 66-70 High Street will also locate a tall building in close proximity to the Site, like Henry House and William House on the opposite side of Ringers Road. Like 66-70 High Street, Henry House and William House already denote a marked change in scale from adjacent two storey residential properties, as well as a range of architectural styles and forms. The eastern parts of Ringers Road and Ethelbert Road are demarcated by taller buildings, set within a relatively wide street pattern, such that there is not a perception of 'canyoning' or enclosure in relation to the human scale and experience of the townscape.
- 8.5 The existing buildings at the Site do not contribute positively to the townscape due to their overall lack of architectural detailing and scenic quality. The Site is part of a townscape assessed by the Bromley Town Centre SPD as having a 'medium to high' development potential and where there is an acceptance in principle of a change in building scales between the existing townscape and new development within the Site 10 allocation. The Site is therefore part of a townscape with is considered able to accommodate future change and with 66-70 High Street, Henry House and William House and the extension to Laura Ashley, taller buildings immediately adjacent to lower height properties and set back from the High Street. The Proposed Development would reflect this pattern of the townscape.
- 8.6 In close range views, the existing buildings within the Site are visible from along Ringers Road, Ravensbourne Road, Ethelbert Road and Ethelbert Close. The existing buildings are seen as part of the

varied building styles which extend across landform which falls from the High Street to Ravensbourne Road. The composition of views is channelled due to the alignment of these roads, with the extent of views either truncated by the more elevated High Street or extending westwards across the residential suburbs and interspersed with tall buildings, including St. Mark's Tower.

- 8.7 As one moves along Ringers Road and Ethelbert Road, the sequential experience of views results in existing building forms merging due to changing angles of views, with buildings at close range 'combining' in terms of massing, despite gaps between their building footprints, such as with the Henry House and William House, such that form a very short amount of time, they appear as 'one building' and mass. But they do not dominate, nor are they overbearing because of the street width and architectural detailing to the facades.
- 8.8 In mid-range views, particularly to the west of the town centre, the more undulating pattern of landform enables a greater visibility of buildings across the town centre. The composition of views consists of a consistent scale of residential properties in the foreground, with taller massing in the town centre in the background of the view. This taller massing includes the Mall Tower, the Churchill Theatre, St. Mark's Tower and Henry House and William House, which extend above the skyline, such that views towards the Site are already characterised by tall buildings forming the background of the view. This will continue to be the case with 66-70 High Street, as well as future development as part of the Site 10 allocations. The Site is therefore visually seen within the direct context of taller buildings and will increasingly by so with 66-70 High Street, which in many views will back-cloth the Proposed Development, whilst being seen at distance from the Churchill Theatre and lower in the skyline.
- 8.9 In long range views, including from the elevated terraces of Crystal Palace Park there are panoramic views which include Bromley. The upper parts of the Churchill Theatre, Henry House and William House and St Marks Tower are visible, but form a very small parts of wider views, with the Site again consolidated to directly within this context.

### The Proposed Development

- 8.10 Block A, adjacent to Ringers Road, would extend up to 12 and 14 storeys in height, dropping down in height towards the High Street. Block B, adjacent to Ethelbert Road, would extend up to 10 and 12 storeys in height, dropping down in height away from the High Street, along Ethelbert Road and towards Church House Gardens.
- 8.11 The building façades to Blocks A and B will provide a clear definition between the lower, middle and upper parts of the building, as well as delineating between the co-working spaces and residential parts of the building, enabling active frontages at the street level and a high quality design.

8.12 An internal courtyard will provide a link between Block A and Block B, which along with new planting, seating and a water feature and green roofs atop both Block A and B, provides opportunities for new green infrastructure.

**Response to Reason for Refusal**

8.13 In relation to views of the town centre skyline, the visibility of the Proposed Development would vary between not being visible due to intervening buildings, partly visible or visible in most of its entirety; as is common with a townscape environment.

8.14 Within all the views where the Proposed Development is visible, it will be seen as an integrated part of a cluster of existing buildings, accounting for both the existing situation of Henry House and William House and 66-70 High Street. The Proposed Development will also be seen as part of a varied skyline of tall buildings extending between St. Marks Tower, Henry House and William House, the new 66-70 High Street and the Churchill Theatre. There will be sufficient physical and visual separation between the Proposed Development and the Churchill Theatre, as well as the Proposed Development being seen as lower on the skyline, such that the visual function of the Churchill Theatre as an important civic landmark will remain.

8.15 The Proposed Development would provide additional visual interest to the skyline via the stepped form of Blocks A and B, which will both reflect the underlying landform, as well as provide visual interest between their alternating roof profiles.

8.16 The combination of the high quality design of the Proposed Development, the improved streetscape and the reduced perception of the massing via the stepped roof profiles, in combination with the relatively wide streets and existing and future tall buildings in proximity to the Site would ensure that the Proposed Development was neither overly dominant nor an overbearing addition to the town centre skyline.

8.17 In combination with the height of Henry House and William House to the south of the Site and 66-70 High Street to the east of the Site, the Proposed Development would not be out of context with its immediate surrounds. This is because these existing buildings already denote a notable change in scale from adjacent properties and this in turn is the character of the Site's immediate context, as part of varied townscape where buildings of differing architectural styles, heights and forms are all juxtaposed to one another.

8.18 The experience of the immediate surrounds from the High Street, roads and parts of Church House Gardens will not adversely change in townscape and visual terms as a result of the Proposed Development. This is because the Proposed Development reflects the existing townscape pattern and beneficially adds to this via its own building form, detailing, interest to the streetscape and skyline.

8.19 For the above reasons, the Proposed Development would not cause harm to the character and appearance of the area. The Proposed Development also responds positively to the relevant London Plan and Bromley Local Plan policies in respect of design and townscape and visual matters cited in the RfR.

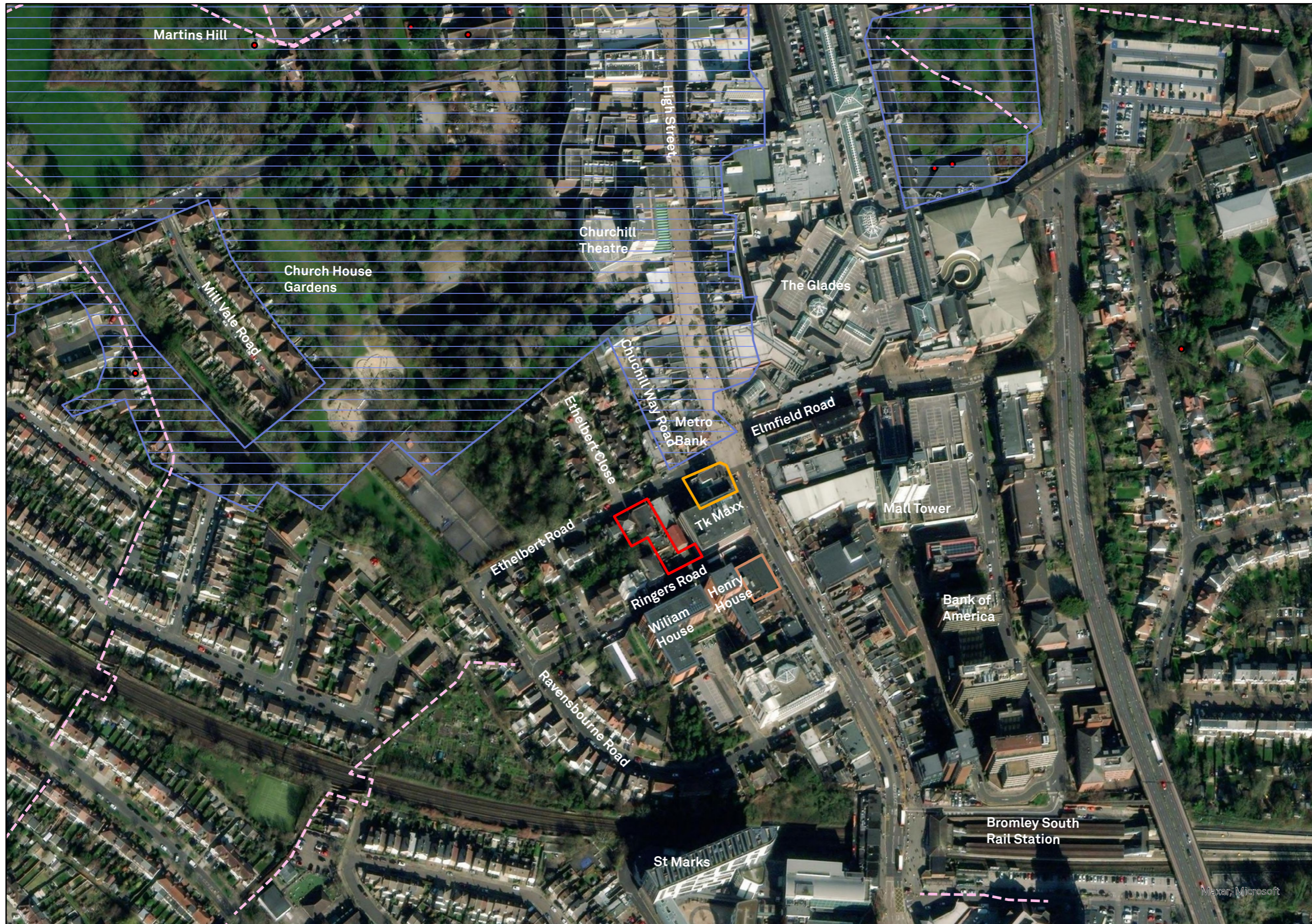
8.20 The Proposed Development will protect the skyline because it will be located in proximity to existing tall buildings and 66-70 High Street in views from the west and north-west of the Site (the main locations of views of the Proposed Development), such that it will either be back-clothed by 66-70 High Street, being lower in height than 66-70 High Street, or seen in its immediate context, along with the Henry House and William House.

8.21 The Proposed Development is not contrary to the Urban Design SPD, as the Proposed Development responds positively to the relevant overarching design principles, which are the stated '*performance indicators*' of good design.

8.22 In respect of the Bromley Town Centre SPD, the Proposed Development would not impact the key element of the Churchill Theatre and would appear as an integrated development with 66-70 High Street and the Henry House and William House, such that it would be well related to these existing buildings and the street scene, in accordance with the SPD guidance. Also in accordance with the SPD guidance, the Proposed Development has not been designed in isolation and has respected the landscape character of Church House Gardens via the lower heights of Block B and their stepped arrangement towards the gardens and Ethelbert Road.

8.23 In conclusion, the Proposed Development reflects the SPD approach of '*replace*', whereby it is a unique solution through the contemporary use of form, materiality and detailing, given the Site is in an area of inconsistent character. The Proposed Development will be beneficial change to the townscape and visual amenity of the area, forming a co-ordinated and integrated part of the Ethelbert Road and Ringers Road townscape, where taller buildings are located on the eastern and more elevated landform, thereby following the existing townscape pattern, as well as that to come via 66-70 High Street and the extension to Laura Ashley.





- Key**
- Site Boundary
  - Public Right of Way
  - Bromley Town Centre Conservation Area

- Relevant Planning Applications**
- 12 Storey Building 66-70 Bromley High Street
  - Laura Ashley 3 storey extension equating to 20m in height

**RINGER'S ROAD**  
 LOCATION PLAN



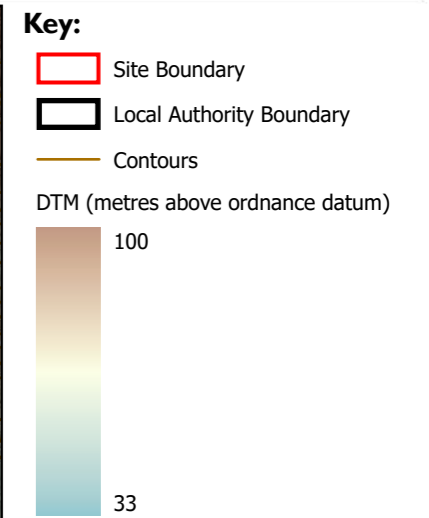
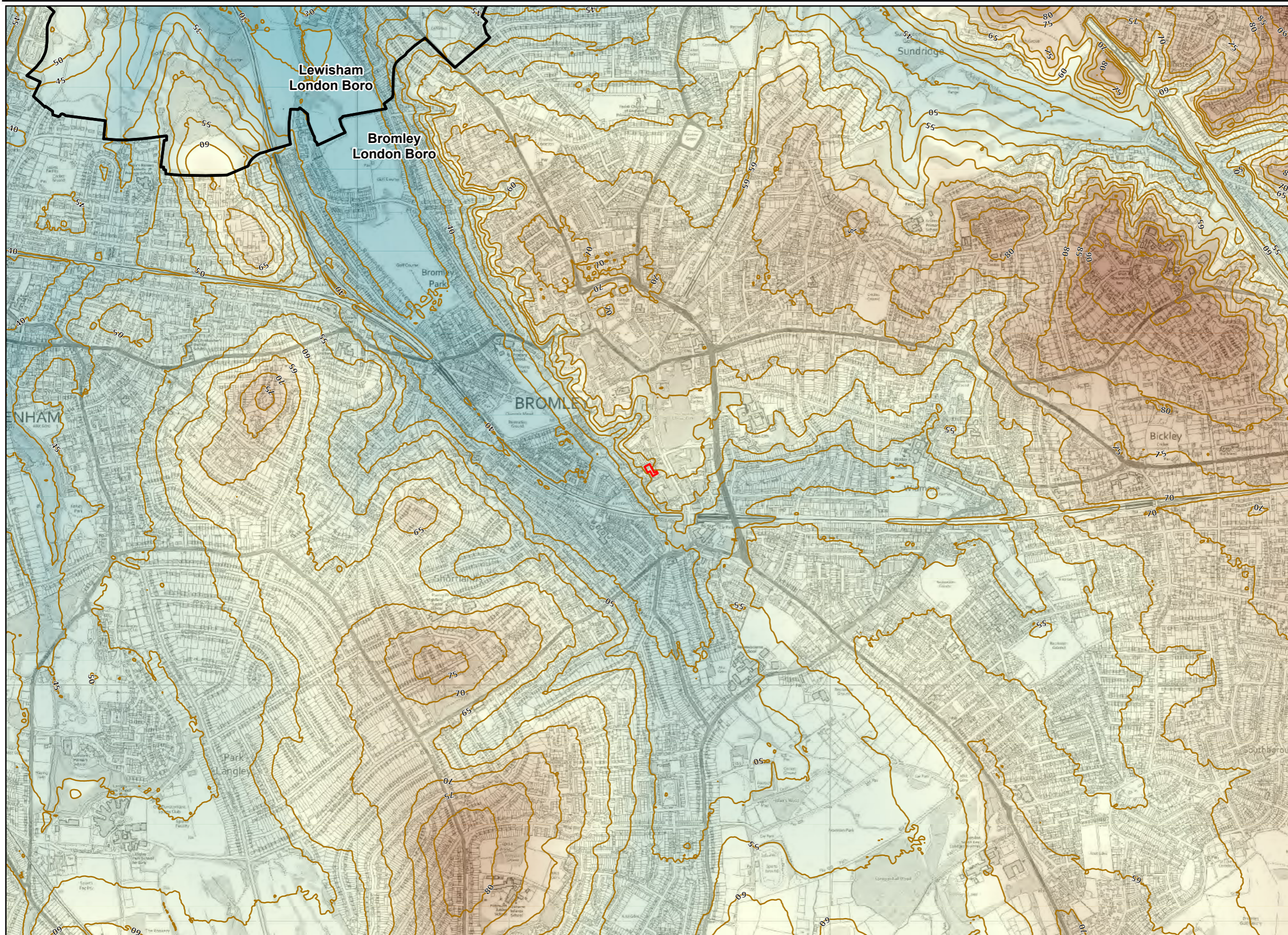


Figure L02



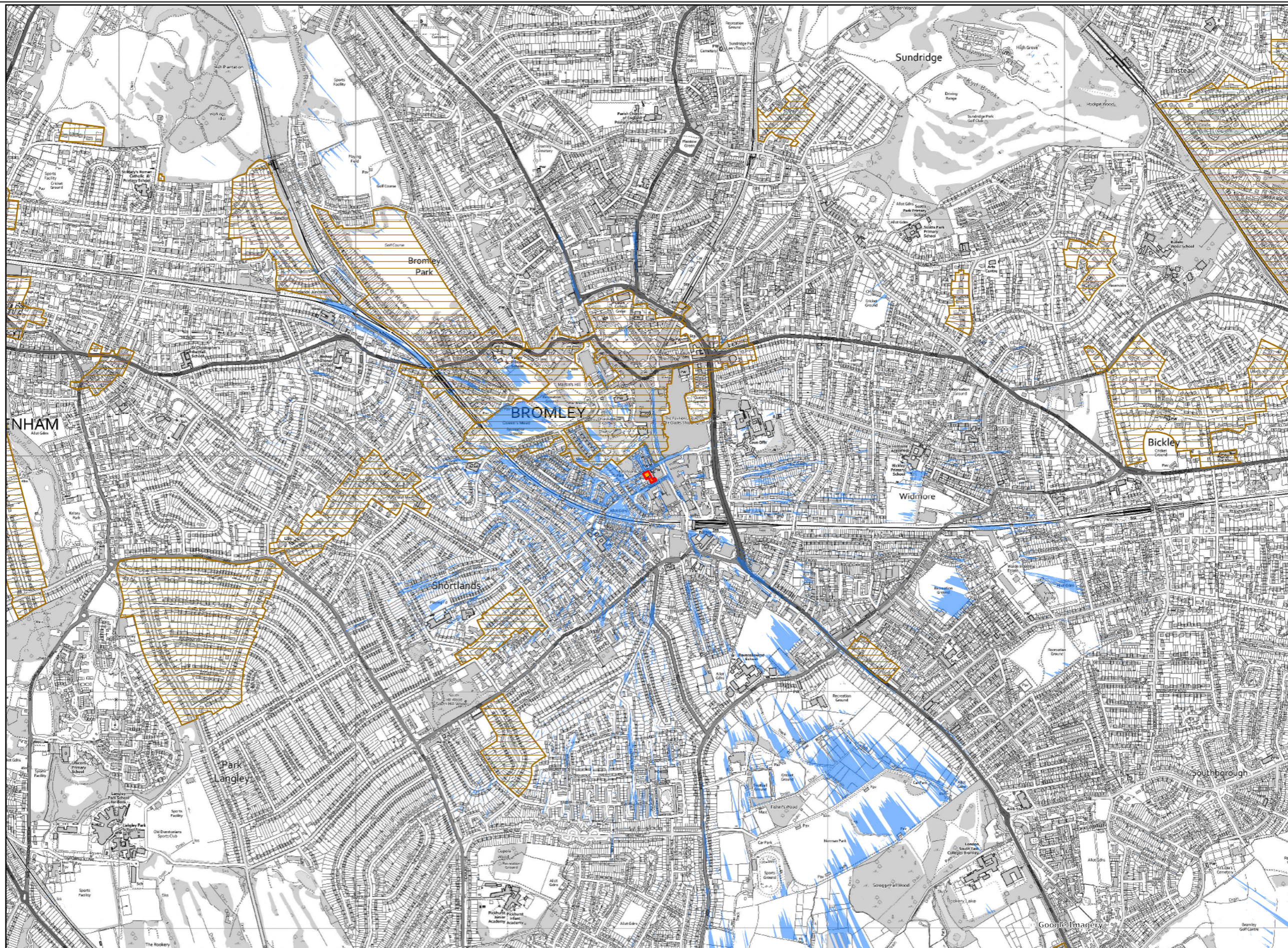


- Key:**
- 1. Ethelbert Town Centre Edge
  - 2. High Street South
  - 3. High Street North
  - 4. Churchill Gardens and Open Space
  - 5. Glades
  - 6. Queen's Gardens
  - 7. Civic Centre
  - 8. Elmfield Office
  - 9. Bromley South
  - 10. Residential East
  - 11. Residential South
  - 12. Residential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

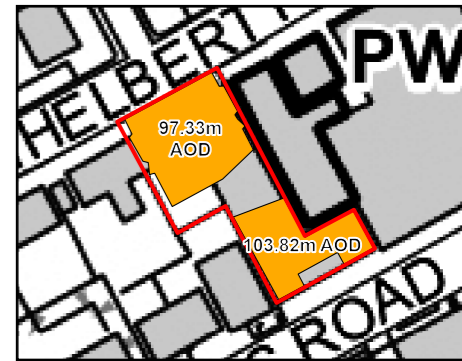
Contains OS data © Crown Copyright and database right 2020.

Figure L03





- Key:**
- Site Boundary
  - Building Footprint
  - Zone of Theoretical Visibility
  - Conservation Areas for Bromley and Croyden



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

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

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

Date and resolution of LIDAR survey data: **Composite, 1m (2022)**

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

## RINGERS ROAD, BROMLEY

### TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

## ZONE OF THEORETICAL VISIBILITY

Drawing No	0312-L03
Status	For Issue
Date	22.05.2024
Scale	1:16,000 @ A3
Revision	E



## 10.0 RH APPENDIX II: REVISED TOWNSCAPE ASSESSMENT

### TOWNSCAPE ASSESSMENT

10.1 The following table sets out the townscape assessment based on the drawings for determination and the inclusion of 66-70 High Street and Laura Ashley extension, based no winter conditions (i.e. when deciduous vegetation is not in leaf). A summer assessment has been included where relevant which accounts for vegetation being in leaf.

Table 10-1: Revised Townscape Assessment

Townscape Receptor	Sensitivity	Assessment	Impact	Effect
The Site	<p><b>Value</b></p> <p>As an area of low scenic quality, weak public realm and with no cultural or recreational value, the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As an existing area of buildings and one which is identified for redevelopment via the Site 10 allocation, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would replace the existing buildings and introduce new residential land uses. Block A and Block B would be taller than the existing buildings on Site and of a higher architectural quality.</p> <p>The Block A would extend to 12 and 14 storeys in height. The lower part of Block A would be delineated by a stepped alignment in the façade, increasing in height east to west. Due to the this, at the eastern part of the building the lower part of Block A would reflect the first storey height of the Tk Maxx building. At the western part of the building, the height of the ground floor would reflect that of five storeys of the adjacent property. The middle part of Block A would consist of a staggered alignment of windows with an alternating pattern of balconies, culminating in a stepped roof profile, rising from east to west.</p> <p>Block B would extend to 10 and 12 storeys in height. The façade would consist of a stepped arrangement of materials, unified by a symmetrical pattern of windows across the lower and middle parts of the façade, which in turn would have an alternating arrangement of balconies.</p> <p>The lower part of Block B would be delineated by a staggered pattern of several materials across the façade. The upper part of Block B would consist of a stepped arrangement to the building massing to enable a roof terrace at the western part of the building. The perceived massing of the two upper storeys would be reduced by the extent of windows, which in combination with step would result in a clear demarcation of the upper part of the building.</p> <p>Both buildings would result in active frontages via the ground floor uses</p>	High	Moderate Beneficial
<b>Published Landscape Character Areas</b>				
NCA 113: North Kent Plain (covers the Site)	<p><b>Value</b></p> <p>There is a strong cultural association associated with the Kent fruit belts, along with extensive areas of ancient woodland, such that the value of the NCA is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the NCA contains settlements (including Bromley) and the published study notes the “<i>strong urban influence</i>”, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would be located within Bromley, in which the published study notes there is a ‘<i>strong urban influence</i>’. The Proposed Development would be perceived in the context of other tall buildings within Bromley (Crest Building, Churchill Theatre, St Marks Tower and Perigon Heights), as well as the future context of 66-70 High Street. The Proposed Development would provide a higher architectural quality to Ringers Road and the Ethelbert Road, thereby responding positively to the Statements of Environmental Opportunity by enhancing the character of the urban areas. Due to the position of the Proposed Development within Bromley and its relatively small scale in relation to the wider extent of the NCA, there would no change to the key characteristics of the NCA.</p>	Neutral	No Change
<b>Bromley SPD Character Areas</b>				
Bromley North	<p><b>Value</b></p> <p>The northern gateway consists of Bromley North railway station and there is a varied scenic quality to the architecture, such that the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>Due to the infrastructure and extent of development the area is assessed as being able to accommodate change and the susceptibility is moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within this character area and therefore there would be no physical change to the character area. The perception of the Proposed Development would be in the context of the Crest Building and 66-70 High Street.</p>	Neutral	No Change
Bromley West	<p><b>Value</b></p> <p>This is a varied area, with retail and Church House gardens. The scenic quality is also varied but there is a cultural</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would be located in Bromley West and would replace existing buildings of very low architectural quality with two new buildings of a higher architectural quality via their form and building materials.</p>	Negligible	Negligible Beneficial

Townscape Receptor	Sensitivity	Assessment	Impact	Effect
	<p>association via the market area and the Conservation Area in part. The value is therefore assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As a town centre, which consists of a range of building styles and heights and Church House gardens, the susceptibility is varied and assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p>Block A would be taller than the Crest Building on the opposite side of Ringers Road, but below the height of 66-70 High Street, such as to form a consolidated area of taller buildings set back from the High street. The Proposed Development would also demarcate a part of the townscape which forms the transition between the High Street and Church House gardens, along with 66-70 High Street. The Proposed Development would retain the alignment of the street pattern along Ringers Road and Ethelbert Road.</p>		
Bromley West – High Street	<p><b>Value</b></p> <p>This is a retail area extending to the east and west of the High Street, including both the vehicular and pedestrianised parts of the High Street. The scenic quality is varied but there is a cultural association via the market area and the Conservation Area in part. Open space is limited to Queens Gardens. The value is therefore assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As a town centre, which consists of a range of building styles and heights, including extensive massing at the Glades and parts of the area are identified for extensive redevelopment. Therefore the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Both Block A and Block B would be taller than the existing buildings on Site, resulting in a notable change.</p> <p>The height of Block A would be perceived locally within the character area, including at the junction of Market Square and the High Street, but beyond 66-70 High Street.</p> <p>The stepped heights of the Proposed Development would reflect the massing and form of the Crest Building on the opposite side of Ringers Road. The overall horizontal form to Block A and Block B would reflect the form of The Churchill Theatre, The Mall Tower and 66-70 High Street. The stepped form of Block A and Block B would provide visual interest and reduce the overall perceived massing of the Proposed Development.</p> <p>The scale and form of the Proposed Development would reinforce the character area as the main core of Bromley and the contextual position of the transition between the pedestrianised and vehicular parts of the High Street.</p> <p>The varied finishes to the ground floors of Block A via louvered cladding, concrete and planters would provide visual interest and additional vegetation to Ringers Road. The louvers and concrete piers on the ground floor of Block A would align with the height of the ground floor of the TK Maxx building. The concrete piers would extend vertically across the lower façade of Block A to form a stepped string course, which would rise to meet the equivalent roof height of buildings adjacent Block A on Ringers Road.</p> <p>The ground floor and lower storeys of Block B would respond to the streetscape via new planters to increase the vegetation along Ethelbert Road, brick to reflect existing building materials and aluminium glazing to define the lower part of the building. The articulation across Block B would consist of a rhythm of vertical and horizontal bands of brick, again to reflect local materials and provide detailing to the façade. The bands of brick would frame the arrangement of windows across the main part of the façade on Ethelbert Road. The perceived mass of the upper two storeys to Block B would be reduced by the stepped arrangement and the glazing panels.</p> <p>The lower height of Block B and the stepping down in scale from Block A, would respond positively to the Conservation Area to the north and the transition in the character area to the vegetated grounds of Church House gardens, in accordance with the guidelines to respond to these parts of the townscape.</p> <p>The change from the Proposed Development would be the introduction of taller buildings of high architectural quality. This would improve the perception of the character area and architectural quality of the character area, in keeping with the scale of the Crest Building on the opposite side of Ringers Road, such that the Proposed Development would be part of consolidated group of taller buildings.</p> <p>In combination with the context, the stepped form to the massing and the reduced perception of the scale of the Block A and Block B via the materials would ensure the Proposed Development was not dominant in the character area, nor overbearing.</p>	Low	Minor Beneficial
Bromley West Church House	<p><b>Value</b></p> <p>There is a cultural association via the Conservation Area and a high recreational value via parts of Church House gardens. The value is therefore assessed as high.</p> <p><b>Susceptibility</b></p> <p>Due to the predominance of open space and consistent scale and pattern of properties adjacent to Ravensbourne Road, but the perception of taller buildings at 66-70 High Street the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located in this character area, which is to the west of the Site, covering the western part of the Ethelbert Road and Ringers Road and extending across Church House gardens. Therefore there would be no physical change to the townscape features.</p> <p>The Proposed Development would be perceived due to its height and proximity, in the same context as 66-70 High Street, demarcating a change in scale in relation to residential properties adjacent to Ethelbert Road, Ringers Road and Ravensbourne Road. However, the Proposed Development would be perceived in the context of the Crest Building 66-70 High Street and taller buildings bordering the character areas, e.g. the Churchill Theatre and St. Marks Tower, such that it would not alter that character of the area.</p>	Neutral	No Change
Bromley East	<p><b>Value</b></p> <p>There is cultural value as the location of the old palace but the scenic quality is low and the value is assessed as low.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change. The Proposed Development would be perceived in the context of the High Street and part of the larger scale massing between the character and the Site, which includes taller buildings on Elmfield Road, the Mall Tower and</p>	Neutral	No Change

Townscape Receptor	Sensitivity	Assessment	Impact	Effect
	<p><b>Susceptibility</b></p> <p>As areas of larger scale massing the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low sensitivity</b>.</p>	<p>the Glades, as well as 66-70 High Street which form the immediate setting to the character area. Due to this, there would be no change to the character of the area.</p>		
Bromley South	<p><b>Value</b></p> <p>There is a scenic quality via taller buildings, along with cultural association with Bromley South railway station and locally listed buildings. The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As an area of tall buildings and rail infrastructure, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within this character area and there would be no physical change. The Proposed Development would be perceived in the context of tall buildings within the character area, which includes St. Marks Tower. Due to the dominance of the railway and these taller buildings the Proposed Development would not alter the character of the area.</p>	Neutral	No Change
<b>Bromley Town Centre Area Action Plan</b>				
BTCAAP Bromley Central (covers the Site)	<p><b>Value</b></p> <p>This is a retail area extending to the east and west of the High Street, including both the vehicular and pedestrianised parts of the High Street. The scenic quality is varied but there is a cultural association via the market area and the Conservation Area in part. Open space is limited to Queens Gardens. The value is therefore assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As a town centre, which consists of a range of building styles and heights, including extensive massing at the Glades and parts of the area are identified for extensive redevelopment via the BTCAPP. Therefore the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Both Block A and Block B would be taller than the existing buildings on Site, resulting in a notable change.</p> <p>The height of Block A would be perceived locally within the character area, including at the junction of Market Square and the High Street, but beyond that of 66-70 High Street.</p> <p>The stepped heights of the Proposed Development would reflect the massing and form of the Crest Building on the opposite side of Ringers Road. The overall horizontal form to Block A and Block B would reflect the form of The Churchill Theatre, The Mall Tower and the tall Bank of America buildings adjacent to Elmfield Road, as well as that of 66-70 High Street. The stepped form of Block A and Block B would provide visual interest and reduce the overall perceived massing of the Proposed Development.</p> <p>The scale and form of the Proposed Development would reinforce the character area as the main core of Bromley and the contextual position of the transition between the pedestrianised and vehicular parts of the High Street.</p> <p>The varied finishes to the ground floors of Block A via louvered cladding, concrete and planters would provide visual interest and additional vegetation to Ringers Road. The louvers and concrete piers on the ground floor of Block A would align with the height of the ground floor of the TK Maxx building. The concrete piers would extend vertically across the lower façade of Block A to form a stepped string course, which would rise to meet the equivalent roof height of buildings adjacent Block A on Ringers Road.</p> <p>The ground floor and lower storeys of Block B would respond to the streetscape via new planters to increase the vegetation along Ethelbert Road, brick to reflect existing building materials and aluminium glazing to define the lower part of the building. The articulation across Block B would consist of a rhythm of vertical and horizontal bands of brick, again to reflect local materials and provide detailing to the façade. The bands of brick would frame the arrangement of windows across the main part of the façade on Ethelbert Road. The perceived mass of the upper two storeys to Block B would be reduced by the stepped arrangement and the glazing panels.</p> <p>The lower height of Block B and the stepping down in scale from Block A, would respond positively to the Conservation Area to the north and the transition in the character area to the vegetated grounds of Church House gardens, in accordance with the guidelines to respond to these parts of the townscape.</p> <p>The change from the Proposed Development would be the introduction of taller buildings of high architectural quality. This would improve the perception of the character area and architectural quality of the character area, in keeping with the scale of the Crest Building on the opposite side of Ringers Road, such that the Proposed Development would be part of consolidated group of taller buildings. In combination with the context and the stepped form to the massing and the reduced perception of the scale of the Block A and Block B via the materials would ensure the Proposed Development was not dominant in the character area, nor overbearing.</p>	Low	Minor Beneficial
BTCAAP The Northern Gateway	<p><b>Value</b></p> <p>The northern gateway consists of Bromley North railway station and there is a varied scenic quality to the architecture, such that the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>Due to the infrastructure and extent of development the area is assessed as being able to accommodate change and the susceptibility is moderate.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within this character area, which is located at the northern edge of Bromley Town Centre and therefore there would be no physical change to the character area. The perception of the Proposed Development would be in the context of the Crest Building.</p>	Neutral	No Change

Townscape Receptor	Sensitivity	Assessment	Impact	Effect
	<p><b>Sensitivity</b></p> <p>The combination of the low value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>			
BTCAAP The North Village	<p><b>Value</b></p> <p>There is a cultural value to this area due to Bromley College with its architecture and vegetation providing a localised scenic quality and the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>Due to the generally consistent scale of buildings across the area, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and the moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located in this character area, which covers the northern part of the High Street, between Market Square and Bromley College. The perception of the Proposed Development would be limited due to the alignment of the street pattern and density of the buildings adjacent to the road networks. The perception of the Proposed Development would reflect that of the existing perception of this part of the townscape and the Crest Building and St. Marks Tower, which are perceived as focal points beyond the character area, such that there would be no change to the character of the area.</p>	Neutral	No Change
BTCAAP Western Edge	<p><b>Value</b></p> <p>There is a cultural association via the Conservation Area and a high recreational value via parts of Church House gardens. The value is therefore assessed as high.</p> <p><b>Susceptibility</b></p> <p>Due to the predominance of open space and consistent scale and pattern of properties adjacent to Ravensbourne Road the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located in this character area, which is to the west of the Site, covering the western part of the Ethelbert Road and Ringers Road and extending across Church House gardens. Therefore there would be no physical change to the townscape character area.</p> <p>The Proposed Development would be perceived due to its height and proximity, demarcating a change in scale in relation to residential properties adjacent to Ethelbert Road, Ringers Road and Ravensbourne Road. However, the Proposed Development would be perceived in the context of the Crest Building and taller buildings bordering the character areas, e.g. the Churchill Theatre and St. Marks Tower and improve the architectural setting to the character area.</p>	Negligible	Negligible Beneficial
BTCAAP Civic Centre	<p><b>Value</b></p> <p>There is cultural value as the location of the old palace but the scenic quality is low and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As areas of larger scale massing the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low sensitivity</b>.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change to the Civic Centre. The Proposed Development would be perceived in the context of the High Street and part of the larger scale massing between the character and the Site, which includes taller buildings on Elmfield Road, the Mall Tower and the Glades which form the immediate setting to the character area. Due to this, there would be no change to the character of the area.</p>	Neutral	No Change
BTCAAP: Bromley South	<p><b>Value</b></p> <p>There is a scenic quality via taller buildings, along with cultural association with Bromley South railway station and locally listed buildings. The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As an area of tall buildings and rail infrastructure, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within this character area and there would be no physical change. The Proposed Development would be perceived in the context of tall buildings within the character area, which includes St. Marks Tower. Due to the dominance of the railway and these taller buildings the Proposed Development would not alter the character of the area.</p>	Neutral	No Change
<b>EDLA Local Townscape Character Areas</b>				
LTCT 1: Bromley	<p><b>Value</b></p> <p>As the area consists of Conservation Areas and large open spaces which provide a recreational value, in combination with a coherent pattern of residential land uses and taller retail and commercial land uses, the value is assessed as medium.</p> <p><b>Susceptibility</b></p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would be located in the town centre and would replace existing buildings of very low architectural quality with two new buildings of a higher architectural quality via their form and building materials. Block A would be up to three storeys taller than the Crest Building on the opposite side of Ringers Road, but would be located in close enough proximity to the Crest Building to be perceived as part of a group of taller buildings. The Proposed Development would also demarcate a part of the townscape which forms the transition between the High Street and Church House gardens, along with 66-70 High Street. The Proposed Development would retain the alignment of the street pattern along Ringers Road and Ethelbert Road. The height of Block A and Block B would be</p>	Negligible	Negligible Beneficial

Townscape Receptor	Sensitivity	Assessment	Impact	Effect
	<p>As the BTCAAP has identified areas of the town centre for redevelopment and the Site is located adjacent to an area identified as a tall building location, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>medium</b> sensitivity to the Proposed Development.</p>	<p>in a part of the townscape where the Crest Building, 66-70 High Street and Laura Ashley extension already introduce height within the townscape, with the perception being localised to the central and southern parts of the LTCT.</p>		
LTCA 1: Residential Town Centre	<p><b>Value</b></p> <p>This is not a designated townscape but there is some distinctiveness in the detailing to the facades of the Victorian townscape, such that the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>there is a consistent scale to most of the properties across the area, being two storey in height. Part of the area is identified for redevelopment, such that the susceptibility is moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the combination of the medium value and moderate susceptibility results in a <b>medium</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within the character area which covers Ethelbert Close to the north of the Site and residential land uses to the west. The Proposed Development (Blocks A and Block B) would be perceived due to their height and proximity and would result in a change in building scale, but not uncharacteristic given the change between two to three storey heights of existing properties is already defined by the Crest Building and the change in scale between 66-70 High Street and the Café.</p> <p>The Proposed Development would be perceived in the context of the Crest Building and 66-70 High Street which already defines a transition in building heights and scale in comparison to the lower heights of residential properties on Ringers Road and Ethelbert Road. The materials and detailing to the Proposed Development would reduce the perceived mass and height of both Block A, via the extent of windows across the upper storeys and stepped form of Block A and Block B. The Proposed Development would introduce buildings of higher architectural quality in proximity to the LTCA which would result in a slight alteration to the character of the area.</p>	Low	Minor Beneficial
LTCA 2: Bromley High Street South (covers the Site)	<p><b>Value</b></p> <p>This part of the townscape is not designated, the scenic qualities are limited by the retail land uses and associated architectural styles, , such that value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As a developed area and one which contains a range of building heights, where buildings are dominant the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would be located in this character area, which extends from the junction of Elmfield Road to Bromley South railway station. The Proposed Development would result in very localised physical change within the LTCA via the removal of existing buildings; however the existing street pattern would be retained, with the perception of increased residential land use, but adjacent to 66-70 High Street.</p> <p>The Proposed Development would be taller than the Crest Building, but below 66-70 High Street and in close proximity to form a consolidated and grouped massing of taller buildings within the character area. The Proposed Development would be set back from the High Street, such that the pattern of lower height buildings and retail land uses adjacent to the High Street which then transition to taller buildings beyond the High street would remain.</p> <p>The Proposed Development would improve the architectural and public realm of the character area. The perception of the Proposed Development would primarily be at close proximity due to the density of the intervening land uses.</p> <p>The lower part of Block A would be delineated by a stepped alignment in the façade, increasing in height east to west. Due to this, at the eastern part of the building the lower part of Block A would reflect the first storey height of the TK Maxx building. At the western part of the building, the height of the ground floor would reflect that of five storeys of the adjacent property.</p>	Moderate	Minor Beneficial
LTCA 3: Bromley High Street North	<p><b>Value</b></p> <p>The area is covered by a Conservation Area and contains several buildings of merit. The pedestrian aspect of the High Street enables a strong sense of place such that the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As an area of large scale buildings, where there is already inter-visibility with tall buildings, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and low susceptibility is assessed as <b>medium</b> sensitivity.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located in this character area. The perception of the Proposed Development would be limited due to the alignment of the street pattern and density of the buildings adjacent to the road networks. There would be no change to the character of the area as a result.</p>	Neutral	No Change
LTCA 4: Church House Gardens and Martins Hill	<p><b>Value</b></p> <p>As an area with a high recreational value and scenic quality, and is covered by two conservation areas, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>The vegetated and open character of the LTCA is such that the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located in this character area and there would be no change to the vegetated character of recreational land use. The Proposed Development would be perceived as part of varied skyline and one of a number of tall buildings, extending between the Churchill Theatre and St. Marks Tower. Due to this the perception of the Proposed Development would not alter the character of the area, which is defined as an open space in an urban centre.</p>	Neutral	No Change



Townscape Receptor	Sensitivity	Assessment	Impact	Effect
	The combination of the high value and high susceptibility results in a <b>high</b> sensitivity to the Proposed Development.			
LTCA 5: The Glades	<p><b>Value</b></p> <p>The condition of the area is high, due to the management, but the overall scenic quality is low, such that the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As an area of extensive hardstanding and buildings which has already altered the underlying pattern of the townscape is assessed as having a low susceptibility.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>As an indoor shopping centre, there would be no change to its character from the Proposed Development.</p>	Neutral	No Change
LTCA 6: Queen's Gardens	<p><b>Value</b></p> <p>As a planted area with a recreational use, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>The susceptibility is also assessed as high, due to the essential planted character of the area.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility, results in a <b>high</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Due to the density of the intervening land uses and their existing influence on this public space any perception of the Proposed Development would not alter its character.</p>	Neutral	No Change
LTCA 7: Civic Centre	<p><b>Value</b></p> <p>The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As an area of large scale massing, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change to the Civic Centre. The Proposed Development would be perceived in the context of the High Street and part of the larger scale massing between the character and the Site, which includes taller buildings on Elmfield Road, the Mall Tower and the Glades which form the immediate setting to the character area. Due to this, there would be no change to the character of the area.</p>	Neutral	No Change
LTCA 8: Elmfield Commercial	<p><b>Value</b></p> <p>The scenic quality is low due to the building styles and the poor interface with the public realm. The value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As an area of tall buildings, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be located within the character area and therefore there would be no physical change to Elmfield Commercial. Due to this, there would be no change to the character of the area.</p>	Neutral	No Change
LTCA 9: St. Marks and Perigon Heights	<p><b>Value</b></p> <p>There are locally listed buildings, a varied scenic quality and therefore the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the LTCA consists of several tall buildings the susceptibility is low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low</b> sensitivity to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The height of the Proposed Development and transition in scale from surrounding residential areas would reflect the character of this area. The scale and form of the Proposed Development, and its articulated façade would also reflect the taller buildings in this character area. The Proposed Development would therefore not alter the townscape character of LTCA 9.</p>	Neutral	No Change
LTCA 10: Bromley East Residential	<p><b>Value</b></p> <p>As a residential area the value is low.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The pattern of the character area would not be altered as the Proposed Development would not be located in the character area. The Proposed Development would be perceived due to the height of the Block A, however this would</p>	Neutral	No Change

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

## 11.0 RH APPENDIX III: REVISED VISUAL ASSESSMENT

11.1 The following sections sets out the revised visual assessment based upon the drawings for determination and the inclusion of 66-70 High Street and Laura Ashley extension, based no winter conditions (i.e. when deciduous vegetation is not in leaf). A summer assessment has been included where relevant which accounts for vegetation being in leaf.

Table 11-1: Revised Visual Assessment

Visual Receptor	Sensitivity	Assessment	Impact	Effect
1. Residents on Ravensbourne Road / Ringers Road	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would be visible, seen back-clothed by 66-70 High Street. Block A would taller than the Crest Building on the south side of Ringers Road. The stepped arrangement of Block A would provide visual interest to the top of the building and to the skyline, in contrast to the predominantly flat roof profiles of the existing buildings. The upper two storeys of Block B would also be visible, being set back from the alignment of Block A via the step in the building form. The extent of windows across the upper parts of Block B would reduce the perceived massing of the building in the view. The height of Block B would mirror that of the Crest Building, such that the combination of Block A, Block B, 66-70 High Street and the Crest Building would form a cluster of buildings within the composition of the view, with Block A being the pinnacle building within the arrangement. The composition of the view already includes tall buildings as focal points, both with the Crest Building and the Mall Tower, along with the future 66-70 High Street, with Block A and Block B replicating this visual pattern, bringing taller buildings in closer proximity to the receptor. The building materials across Block A would provide visual interest whilst reflecting the brick of existing buildings along Ringers Road. The higher quality of the architectural form is assessed as enhancing the composition of the view.</p>	Moderate	Minor Beneficial
2. Residents on Ethelbert Road (Refer VuCity View G, J and K)	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Both Blocks A and B would be visible due to the orientation of the view across Ethelbert Road and the height of Blocks A and B extending above intervening properties, as well as being in a more elevated position in relation to the receptor. Block B would be back-clothed by 66-70 High Street and seen in this context. The articulation to the façade of Block B would provide a visual rhythm across the lower floor. The brick façade across Part B would differentiate it from the windows, panels and brick across Block A, so that both Blocks would be seen as different buildings. The height of Block A and B would be a noticeable change to the view in comparison to the scale of existing properties, but not uncharacteristic given views of 66-70 High Street, the upper parts of the Crest Building and St Marks Tower, which is visible along Ravensbourne Road, such that the Proposed Development would similarly form a focal point, albeit in closer proximity to the receptor than the existing buildings. The higher quality of the architectural form and materials is assessed as enhancing the composition of the view by providing a visually interesting building façade.</p>	High	Moderate Beneficial
3. Residents on Ethelbert Close	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Block A and Block B would be visible at close range, resulting in two buildings of a different scale in comparison to the existing buildings along Ethelbert Road within the composition of the view, but of a similar scale to 66-70 High Street. The articulation to the façade of Block B, via the differing materials, the stepped arrangement of the upper two storeys and the extent of windows would provide visual interest as well as reduce the overall perception of the massing. The articulation across the lower storey of Block B would be delineated by a staggered pattern of several materials across the façade. This would include vertical brick detailing and louvered panels and planters for visual interest. Block A would extend slightly above Block B reflecting the composition of the view in respect of the upper parts of the Crest Building are already visible. The higher quality of the architectural form and materials is assessed as enhancing the composition of the view by providing a visually interesting building façade.</p>	High	Moderate Beneficial
4. Visitors and pedestrians on Elmfield Road / Bromley High Street (Refer VuCity View H)	<p><b>Value</b></p> <p>The location has a cultural association, being at the edge of the Conservation Area and is likely to be experienced by a high number of people due to being on the High Street. The value is therefore assessed medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor may be visiting the conservation area, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>66-70 High Street would screen most of Block A, so that only the upper parts of the southern façade would be visible. Part of the eastern and northern façade of Block B would be visible, seen at a lower height than 66-70 High Street and visually different design. Block B would provide visual interest and a visual perception of the sloping landform beyond the High Street via the stepped arrangement to the roof line. The extent of windows would reduce the perceived mass of the façade and upper storeys, with the brick panelling reflecting the brick materials on the High Street, at the junction with Ethelbert Road.</p>	Low	Minor Beneficial
5. Visitors and pedestrians on Elmfield Road	<p><b>Value</b></p>	<p><b>Operation Year 1 (winter)</b></p>	Negligible	Neutral

Visual Receptor	Sensitivity	Assessment	Impact	Effect
(Refer to VuCity View L)	<p>The view is not designated and at this location from the conservation area does not contribute to the cultural association. The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p>Due to the alignment of Elmfield Road and the foreshortening from the height of the intervening buildings on the south side of the road, Block A would not be visible. A small part of the upper three storeys of Block B would be visible, with the remainder of the building being screened by 66-70 High Street. Due to the distance and intervening buildings, Block B would not be an unobtrusive change and the overall change to the composition of the view would be very small, with no overall effect.</p>		
6A. Visitors and pedestrians on Bromley High Street (Refer to VuCity View F)	<p><b>Value</b></p> <p>The view is not designated, but is likely to be visited by a high number of people, such that the value is medium.</p> <p><b>Susceptibility</b></p> <p>As views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Most of the upper storeys of Block A would be screened by the extension to Laura Ashley. The small part of the upper floor of Block A which would be visible would be seen at the same height as the Crest Building and would be a very small change to the composition of the view, with no overall effect.</p>	Negligible	Neutral
6B. Visitors and pedestrians on Bromley High Street opposite Ringers Road (Refer to VuCity View I)	<p><b>Value</b></p> <p>The view is not designated, but is likely to be visited by a high number of people, such that the value is medium.</p> <p><b>Susceptibility</b></p> <p>As views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Most of the southern and eastern façade of Block A would be visible, providing an improved visual quality to the view in comparison to the existing building. Block A would be seen in the context of the taller Laura Ashley and Crest Building, being visually set back from the High Street. Channelled views along Ringers Road would remain to the wider townscape, with the stepped profile of Block A providing a visual cue to the building stepping down towards the receptor on the High Street.</p>	Moderate	Minor Beneficial
7. Visitors to Bromley at Bromley Railway Station	<p><b>Value</b></p> <p>The view is not designated, but is likely to be visited by a high number of people, such that the value is medium.</p> <p><b>Susceptibility</b></p> <p>As views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The very upper parts of Block A would be visible, with Block B not visible due to the combination of distance and intervening buildings (including Block A). The horizontal form to the roof of Block A would reflect the horizontal form of existing buildings along the High Street, including the roof line of no.44 High Street. The overall change to the view would be very small, with the channelled alignment along the High Street remaining the focal point to the view, such that there would be no effect to the composition of the view.</p>	Negligible	Neutral
8. Pedestrians crossing the railway line (refer to VuCity View C)	<p><b>Value</b></p> <p>The view is identified in the BTCAAP as one of the key views across the townscape. The value is therefore assessed as high.</p> <p><b>Susceptibility</b></p> <p>Due to the location above the railway the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Both Block A and Block B would be visible, although seen through the mesh fencing across the railway bridge and back-clothed by 66-70 High Street. Block A and Block B would provide visual interest to the view, by reflecting the rhythm of building heights which exists between St. Marks Tower, the Crest Building and 66-70 High Street. All these existing building would remain visible, with 66-70 partly screened by Block A with views channelled between Block A and B. The Proposed Development would not compete with the views of the Churchill Theatre, due to its lower position within the townscape and intervening distance. The height of Block A and B would extend above the Crest Building, with Block B extending above 66-70 High Street. The stepped arrangement to the upper storeys of Block A and Block B would reduce the perceived massing of these parts of the building and provide visual interest to the skyline. Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from the Crest Building to Block B and then 66-70 High Street, such that visually they would form a consolidated cluster of buildings within the view.</p> <p><b>Operation Year 1 (summer)</b></p> <p>With the railway line vegetation in leaf, the Proposed Development would not be visible.</p>	Low	Minor Beneficial

Visual Receptor	Sensitivity	Assessment	Impact	Effect
9. Residents on Ridley Road	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Block A and Block B would be visible, extending above the intervening two storey residential properties and back-clothed against 66-70 High Street. The height of Block A would extend above the Crest Building, but Block A would be seen as the centre-piece to the stepped arrangement of buildings, extending from the Crest Building, 66-70 High Street and then back down to Block B. The Proposed Development would be seen as part of group of buildings and provide visual interest to the skyline, replacing views of the upper parts of the Mall Tower with buildings of higher architectural quality.</p>	Moderate	Minor Beneficial
10. Recreational users in Church House Gardens  (refer to VuCity View B)	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Both Blocks A and B would be visible due to the orientation of the view across the gardens, but back-clothed by 66-70 High Street. Views of Block B would be softened by the density of the intervening vegetation in winter. The height of Block A would be a noticeable change to the view, but not uncharacteristic given the composition of the view is demarcated by contemporary buildings extending above lower height residential properties via 66-70 High Street, the Crest Building and St. Marks Tower. As the composition of the view is therefore already defined by taller buildings bordering the gardens and the perception of the Town Centre, the Proposed Development would not be a complete change to the view, nor out of context.</p>	Low	Minor Beneficial
11A. Visitors to the Churchill Theatre	<p><b>Value</b></p> <p>The location is part of the local importance to the setting of theatre and the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor is likely to be a visitor to a cultural landmark, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and the moderate susceptibility results in a <b>medium sensitivity</b>.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be visible due to the distance between the receptor and the Site and the proximity of intervening vegetation and boundary walls.</p>	Neutral	No Change
11B. Visitors to Church House Gardens  (Refer VuCity View P)	<p><b>Value</b></p> <p>The location is part of the local importance to the setting of theatre and a park, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As recreational users, the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and the high susceptibility results in a <b>high sensitivity</b>.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>A small part of the northern façade of Block B would be visible seen through gaps in the existing vegetation, which includes evergreen species. The Block B façade would be seen in the context of 66-70 High Street, also heavily screened and would provide a more developed visual setting to the park, but no result in an effect to the view.</p>	Negligible	No Change
12. Visitors and pedestrians on Bromley High Street  (Refer VuCity View M and O)	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people but is not designated nor do views form part of the experience, the value is medium.</p> <p><b>Susceptibility</b></p> <p>As the views are incidental to the experience of the receptor the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Block A and Block B would be visible seen would be visible, due to extending above the intervening buildings on the High Street and but in the context of 66-70 High Street and at a lower height. Block A and Bloc B would therefore establish a stepped arrangement of building in combination with 66-70 High Street, with a clear sense of the individuality of the buildings retained by the differing facades and separation between the buildings. This arrangement of buildings would provide visual interest to the view.</p>	Low	Minor Beneficial
13. Visitors and pedestrians at Market Street	<p><b>Value</b></p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper parts of Block A would be visible extending above the intervening buildings on the High Street and seen lower in height than 66-70, which would be the main focal point of the view. Block A would therefore establish a stepped arrangement of massing,</p>	Negligible	Negligible Beneficial

Visual Receptor	Sensitivity	Assessment	Impact	Effect
(Refer VuCity View Q)	<p>The view is not designated but this location is from the conservation area as is likely to be visited by a high number of people. The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor may be visiting the conservation area, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p>and form part of a group of buildings. Block B would not be visible due to the alignment of the view and intervening building. Block A would reflect the brick materiality of buildings along the High Street and form part of the taller massing beyond the High Street and visual interest.</p>		
14. Visitors and pedestrians at Church Road	<p><b>Value</b></p> <p>The view is not designated but this location is of the Church and as is likely to be visited by a high number of people. The value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor may be visiting the Church, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and moderate susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Neither Block A, nor Block B, would be visible due to the distance between the receptor and the Site, the density of the intervening vegetation and the fall in the underlying landform.</p>	Neutral	No Change
15. Visitors and recreational users at Church House gardens	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper parts of Block A and Block B would be visible although largely softened by the intervening vegetation within the gardens. The upper part of Block A would be seen on the context of 66-70 High Street, although not visually prominent due to the filtering by the intervening vegetation and at a lower height. Block A would not alter the visual relationship between the gardens and the town centre, which is already defined by views of the Churchill Theatre and the Crest Building and 66-70 High Street. Views of Block A would reflect the horizontal form of the Churchill Theatre, and would be seen lower in height in the composition of the view, thereby retaining the visual importance of the Churchill Theatre.</p> <p><b>Operation Year 1 (summer)</b></p> <p>In summer, the Proposed Development would not be visible due to the intervening vegetation being in leaf.</p>	Negligible	Negligible Beneficial
16. Recreational users at Martins Hill (Bromley War Memorial) (ref to VuCity View A)	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Only the upper part of Block A would be visible as the density of the intervening vegetation would screen the remainder of the Proposed Development even in winter. The horizontal form of the roof profile to Block A would reflect the horizontal form of 66-70 High Street, whilst set lower in the skyline, providing visual interest.</p> <p><b>Operation Year 1 (summer)</b></p> <p>With the vegetation in leaf, the Proposed Development would not be visible.</p>	Negligible	Negligible Beneficial
17. Recreational users at Martins Hill recreation ground (Queensmead) (refer VuCity View E)	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park and part of a Conservation Area the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter) Existing Baseline</b></p> <p>The stepped arrangement to the upper storeys of Block B would be visible, reflecting the underlying pattern of falling landform. Block A would also be visible, extending above the intervening vegetation and slightly above the Crest building, whilst remaining below 66-70 High Street. The arrangement of Block A and Block B would form a cluster of buildings with the Crest Building, 6670 High Street and the Mall Tower. The Churchill Theatre would remain a notable building within the view, due to its position on the ridge line and that the Proposed Development would be set lower in the townscape and at distance from the Theatre.</p>	Low	Minor Beneficial

Visual Receptor	Sensitivity	Assessment	Impact	Effect
18. Visitors and pedestrians adjacent to Bromley College	<p><b>Value</b></p> <p>The view is not designated but this location includes the College and as is likely to be visited by a high number of people. The value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor may be visiting the College, the susceptibility is assessed as moderate.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and moderate susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Due to the distance from the Site, the alignment of the view and the intervening buildings and the underlying fall in the landform across Bromley, the Proposed Development would not be visible.</p>	Neutral	No Change
19. Motorists on the A21 on the northern approach to Bromley	<p><b>Value</b></p> <p>As this location is not designated, but is a local transport route with a high number of people, the value is medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a main road user, the susceptibility is low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Due to the distance and intervening buildings, the Proposed Development would not be visible.</p>	Neutral	No Change
20. Pedestrians on Beckenham Lane	<p><b>Value</b></p> <p>As the location is likely to be in regular use the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As views are incidental to the activity, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The combination of distance and the height of the railway line would screen the Proposed Development.</p>	Neutral	No Change
21. Pedestrians on Farnaby Road	<p><b>Value</b></p> <p>As the location is likely to be in regular use and views across the Shortlands Village Conservation Area are heavily screened by the roadside vegetation, the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As views are incidental to the activity, the susceptibility is assessed as low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The combination of distance and intervening vegetation would result in the Proposed Development being screened.</p>	Neutral	No Change
22. Recreational users at Plaistow Lane	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation where the surrounding are incidental, the susceptibility is low.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and low susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be visible due to the intervening buildings, vegetation and distance.</p>	Neutral	No Change
23. Residents on Bishops Avenue	<p><b>Value</b></p>	<p><b>Operation Year 1 (winter)</b></p>	Negligible	Neutral

Visual Receptor	Sensitivity	Assessment	Impact	Effect
	<p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p>A small part of the upper storey of Block A would be visible in the background of the view, with the remainder of the building screened by 66-70 High Street and the Laura Ashely extension. The very small scale change to the composition of the view would not result in an effect.</p>		
24. Residents at The Chase	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper parts of Block A would be visible in the background of the view, whilst Block B would be screened by the intervening buildings. Block A would be seen in the context of the Mall Tower, 66-70 High Street and the upper parts of St Marks Tower and the Bank of America buildings adjacent to Elmfield Road; however Block A would be lower in height within the composition of the view than these buildings. The stepped horizontal form of Block A would reflect and the form of the buildings adjacent to Elmfield Road. The Proposed Development would increase the number of tall buildings in the background of the view, but reflect the existing composition which already demarcates the town centre and the change in scale between two storey residential properties and taller buildings.</p>	Negligible	Negligible Beneficial
25. Residents at Murray Avenue	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper parts of Block A would be visible in the background of the view, being adjacent to the upper parts of the Crest Building and seen beyond tall buildings adjacent to Elmfield Road (Bank of America) and in the context of 66-70 High Street. The Proposed Development would reflect the visual delineation of the town centre and be seen as part of a cluster of buildings within the composition of the view.</p>	Negligible	Negligible Beneficial
26. Motorists on the A21 at the southern approach to Bromley	<p><b>Value</b></p> <p>As this location is not designated, but is a local transport route with a high number of people, the value is medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a main road user, the susceptibility is low.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and low susceptibility results in a <b>low sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be visible due to the height of Perigon Heights, the intervening buildings and distance from the Site.</p>	Neutral	No Change
27. Residents on Cameron Road	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>As small part of the upper storey of Block A would be visible above the angled roof line of St Marks Tower, along with a small part of Block B. The angled alignment and form of St. Marks Tower would remain the notable feature of the view, such that the Proposed Development would not be prominent, and form a barely discernible change to the view, providing some additional interest on the skyline.</p>	Negligible	Negligible Beneficial
28. Residents on Cumberland and Durham Avenue	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Block A and Block B would be visible, although largely softened by the density of the intervening vegetation and back-clothed by 66-70 High Street. Both Block A and Block B would also be seen adjacent to the Crest Building, forming a consolidated arrangement of massing. Whilst additional massing within the view, it would not alter the composition of the view, which consists of taller buildings in the background of the view demarcating the town centre, such that there would be no overall effect.</p> <p><b>Operation Year 1 (summer)</b></p>	Negligible	Neutral



Visual Receptor	Sensitivity	Assessment	Impact	Effect
	<p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	The Proposed Development would not be visible due to the screening from the intervening roadside vegetation.		
29. Residents on Cumberland Avenue (refer to VuCity View D)	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>Block A and Block B would be visible in the background of the view, being seen in the context of 66-70 High Street, which would back-cloth Block A and the Mall Tower and the Crest Building. The Proposed Development would be lower in height than 66-70 High Street. The Proposed Development would integrate with the existing skyline, via stepping up in height across Block B and Block A, mirroring the step in scale across the Crest Building along Ringers Road and provide visual interest to the skyline and a part of the townscape already demarcated by tall buildings.</p>	Negligible	Negligible Beneficial
30. Residents on Kingswood Road	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper part of Block A would be visible from the more elevated parts of the road and would be seen as one of several taller buildings extending above the skyline, situated between the Churchill Theatre, 66-70 High Street and St. Marks Tower. The Proposed Development would represent a very small change to the composition of the view and no overall effect.</p>	Negligible	Neutral
31. Recreational users at Southlands Park	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper part of Block A would be visible in the background of the view, extending very slightly above the intervening residential properties and vegetation and seen in the context of the upper parts of 66-70 High Street. Due to the distance and the extent of buildings within the view, the change to the composition of the view would be barely perceptible, resulting in no overall effect to the composition of the view.</p> <p><b>Operation Year 1 (summer)</b></p> <p>With the intervening vegetation in leaf, the Proposed Development would not be visible.</p>	Negligible	Neutral
32. Recreational users at Norman Park	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across to Bromley, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper storeys of Block A would be visible, seen extending directly above the Crest Building and in the context of 66-70 High Street. Block B would not be visible, due to being screened by Block A. Block A would form part of the background of the view and varied range of building heights and styles, which include Perigon Heights and 66-70 High Street. The Proposed Development would increase the amount of development to the west of the High Street in the composition of the view, which is concentrated to the east of the High Street and be seen as part of group of taller buildings in the background of the view and providing additional visual interest.</p>	Negligible	Negligible Beneficial
33. Recreational users at Langley Park	<p><b>Value</b></p> <p>The location is part of the public rights of way route and the value is assessed as medium.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the medium value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be visible due to the intervening buildings, vegetation, distance and undulating landform.</p>	Neutral	No Change

Visual Receptor	Sensitivity	Assessment	Impact	Effect
34. Residents on Chesham Avenue	<p><b>Value</b></p> <p>The location is not designated, being a residential area such that the location is not likely to be visited by a high number of people and the value is assessed as low.</p> <p><b>Susceptibility</b></p> <p>As the receptor is a resident the susceptibility is high.</p> <p><b>Sensitivity</b></p> <p>The combination of the low value and high susceptibility results in a <b>medium sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The upper part of Block A would be visible, but at distance such that it would form a very small part of the view and as seen in the context of 66-70, would not result in an effect.</p>	Negligible	Neutral
35. Recreational users at Keston Common	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter)</b></p> <p>The Proposed Development would not be visible due to the density of the intervening vegetation.</p>	Neutral	No Change
36. Visitors and recreational users at Crystal Palace Park	<p><b>Value</b></p> <p>As the location is likely to be experienced by a high number of people and there are vistas across the park and the view is designated in the Local Plan, the value is assessed as high.</p> <p><b>Susceptibility</b></p> <p>As the receptor is engaged in outdoor recreation, the susceptibility is assessed as high.</p> <p><b>Sensitivity</b></p> <p>The combination of the high value and high susceptibility results in a <b>high sensitivity</b> to the Proposed Development.</p>	<p><b>Operation Year 1 (winter) Existing Baseline</b></p> <p>Block A and Block B would be visible, due to the elevated position of the receptor, whom are located approximately 6.2km from the Site. The Proposed Development would be seen between the Mall Tower and St Marks Tower, back clothed by 66-70 High Street, with views of the Churchill Theatre remaining. At this distance, the height of Block A and Block B would form a co-ordinated arrangement of massing but at this distance not result in an effect to the view.</p>	Negligible	Neutral