

Ringers Road, Bromley, London Planning Appeal

Appellant's Proof of Evidence: Architecture



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Hollaway Relevant Experience

Hollaway is a RIBA award-winning architectural practice that has a strong reputation for high quality design, competing on a national and international level.

Based in London and Kent, the firm offers both architecture and interior design expertise. We employ youth and experience in balance and the team is passionately involved in all projects from inception through to completion, ensuring delivery of quality and reinforcement of the design concept. The design processes, in which we sketch, build physical models and create computer visualisations in order to experiment and innovate, delivers architecture that balances sensitive contextual response with elegant functionality.

We are committed to delivering high quality projects that present innovative design solutions and excellent value through careful control of cost and programme that ensure client satisfaction. For all projects undertaken, regardless of scale or budget, we strive to gain a clear understanding of our client's brief to define clear objectives and requirements. We spend time working with our clients and specialist consultants to identify opportunities, allowing us to investigate design options to produce an optimum proposal.

Underlying the approach to all our projects is an unwavering pursuit of the right solution, meaning that we strive for simple yet subtle designs that work efficiently, have a clear delivery of concept and are enjoyed by end users, and ultimately contribute to the context of place.

We offer architectural services through RIBA Stages 0-7, as well as offering in house Interior Design. As a practice, we utilise the latest technology and software in the development of our schemes, including delivery of projects using BIM collaboratively, creating realistic CGI images in house, and regularly use Virtual Reality Technology to assist in reviewing and presenting our designs.

With 50 staff across our three studios, we have a diverse and flexible resource at our disposal. With architects, technicians, and interior designers in all of our studios, we are able to adapt to accommodate projects of all scales.



Curious Brewery, completed for Chapel Down



Crit Building, completed for Kent School of Architecture



Skatepark - Under Construction Shepway Sports Trust



Elwick Place - Delivered in BIM for Stanhope



Clifton Slipways - Planning Approved

Experience

Hollaway has extensive experience of large and medium scale developments and we work with a number of developers across London and the south east, at both planning and delivery stage.

Our portfolio exhibits our ambitious approach to key town centre sites, whereby we have successfully gained planning consent for high densities of residential, as part of many mixed use schemes. Many of these have been built out and have often resulted in award winning designs.

St Marks Square, Bromley

Notably Our recently completed St Marks Square in Bromley scheme where Hollaway's were chosen to work alongside Cathedral Group (Now U + i) and Bromley Council on the Bromley South Central development completed in 2019.

The Bromley development is a £100m mixed-use scheme intended to transform the southern part of Bromley Town Centre's and act as a catalyst for regeneration in the South end of Bromley High Street. At the heart of a proposed new residential and leisure quarter. A landscaped public square sits surrounded by a 130-bedroom business hotel, 200 private and affordable apartments, cinema, 25,000 sq ft of cafés and restaurants, and a new 400 space underground car park.

The proposals include a commitment to achieving Code for Sustainable Homes Level 4 across the residential element of the scheme together with up to 30% carbon reduction across the development. The proposals also include a dedicated combined heat and power system. The development will create an estimated

220 jobs in Bromley and inject £220m into the local economy over the next 10 years.

The Fisheries, London

We have recently designed and delivered the Fisheries project in Hackney, 31 apartments and 24,000sqft of co-working space, utilizing an existing building and creating a complex double basement. This project recently won 'Peoples choice' at the Hackney Design Awards.

Newtown Works, Ashford

In Ashford, we gained consent for the conversion of the listed railway sheds at Newtown works to provide a mixed use development of film studios, a 120 bed hotel, 68 serviced apartments, and in excess of 300 homes, for Quinn Estates.

Victoria Way/Powergen, Ashford

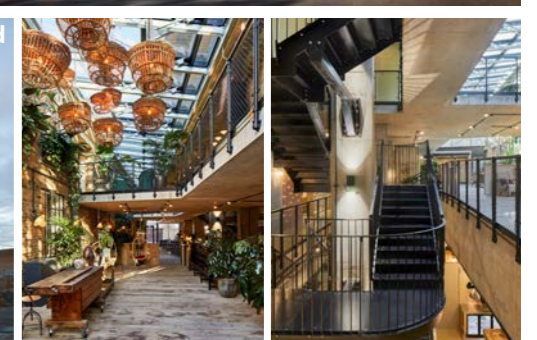
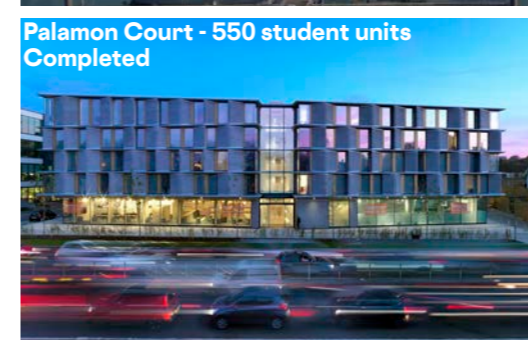
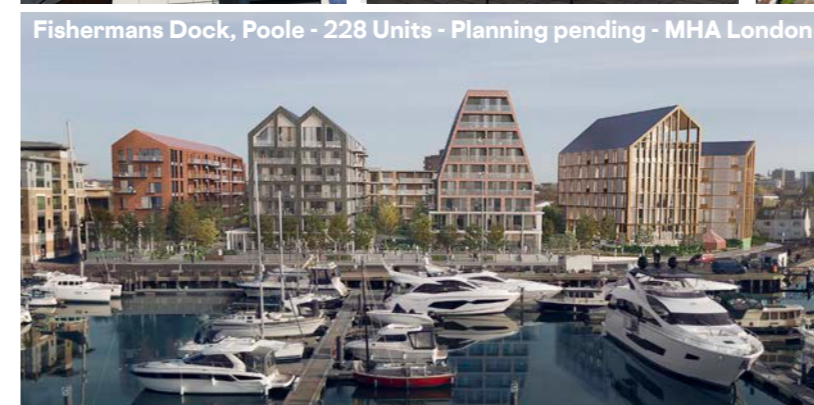
Our Victoria Way and Powergen schemes, next to the railway station, are under construction, providing 750+ new residential units and a 120 bed hotel. Directly opposite these key developments is the Curious Brewery, one of our many projects designed and delivered for Chapel Down Wine.

Elwick Place, Ashford

At Elwick Place, we have completed a new Picturehouse cinema and Hotel for Stanhope, with the next phase of 220 apartments currently being developed to planning submission.

KWG Site, Ashford

Also in Ashford, we have recently secured consent for the KWG site, offering 243 new apartments for U&i, a scheme at the centre of a wider masterplan we are developing for the LPA.



1.0 - Introduction

Project Team

1.1. This statement has been provided by Alex Richards and Lianne Clark from Hollaway Studio to support the planning appeal for a residential development on the site of 2-4 Ringers Road and 5 Ethelbert Road Bromley. .

1.2. This statement refers to several planning application drawings and documents listed, and supported by the Design and Access Statement with DAS addendum which was produced by Hollaway Studio in support of both the original and amended planning application submission.

1.3. The purpose of this document is to provide evidence to respond to the reasons for the planning application refusal and support the appeal process. This statement particularly details the thorough design process and iterative feedback from stakeholders, and provides evidence to address the issues relating to architecture and design of the scheme which arise from the reasons for refusal.

1.4. Summary of Reasons for Refusal:

1.5. Reason 3: The proposed development, by reason of its siting, height, scale, massing and appearance would appear as an over-intensive development within a confined site and would prejudice the development potential of the adjoining sites within the allocated Site 10 in the Local Plan. The proposal would appear as an overly dominant and overbearing addition to the town centre skyline and out of context with its immediate surroundings. The proposed development would therefore cause harm to the character and appearance of the area and fail to preserve or enhance

the setting of the Bromley Town Centre Conservation Area, contrary to London Plan Policies D1, D3, D4, D7, D9 and HC1; Local Plan Policy 37, 42, 47, 48 and Site Allocation 10; Bromley Urban Design SPD and Bromley Town Centre SPD.

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

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

Alex Richards - Partner

BArch (Hons), MArch, RIAS, ARB, RIBA



Alex joined the Practice as an experienced Architect in 2016 and quickly became a Partner in 2018 through demonstrating his ability and passion to lead on the design and delivery of high-quality architectural projects across London and the South East.

Alex's passion is in problem solving, be it a constrained site, complex brief or construction detail. He enjoys the discussion and critical thinking required to interrogate and resolve an issue to achieve a solution built on opportunities offered by existing context, or new ambition.

Alex has been involved with the delivery of the Elwick Place, Ashford and is the Partner leading the new Concert Hall for Benenden School.

Lianne Clark - Associate

BA Hons, MArch, PgDip, ARB, RIBA



Working directly underneath the Practice Partners, Lianne is an Associate in our London Studio, and is responsible for leading multiple projects across all stages, including successfully securing planning and listed building consent for a £300 million commercial and residential development at Newtown Works in Ashford, Kent, which included the restoration and redevelopment of a 320m long listed train shed and new build film studios complex.

Lianne has lead some of our most complex projects to date, including securing planning permission for a 21 storey residential building at Clifton Slipways, Gravesend, and an 18 Storey building at Newtown Works, as shown within the portfolios on the previous page.

2.0 - Relevant Planning Policy

2.1. Rather than duplicate the policy considerations that were fundamental to this design proposal, please refer to the proof of evidence by others (notably Mark Batchelor of 4TY Planning).

Grenfell and building safety act - second stair:

2.2. Following the Grenfell inquiry, new regulations were introduced which imposed more stringent regulations on the design and delivery of High Rise Buildings whereby buildings over 18m required a new staircase and other stringent considerations. This came into effect after the initial planning application was submitted, however the design team revisited the design to ensure the important safety regulation was accommodated in order that the building could be successfully and safely delivered.

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

London Plan 2023 Revision:

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

2.5. Bromley Council Area Action Plan: The adjoining page is a summary of the work produced by Stitch Architects on behalf of Bromley Council.

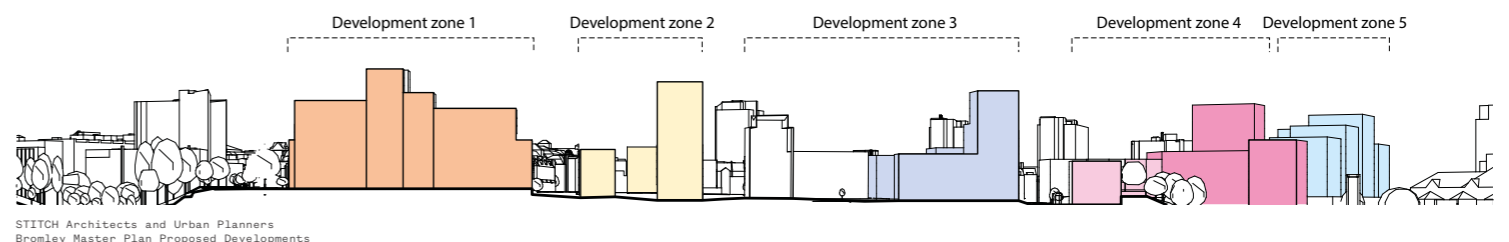
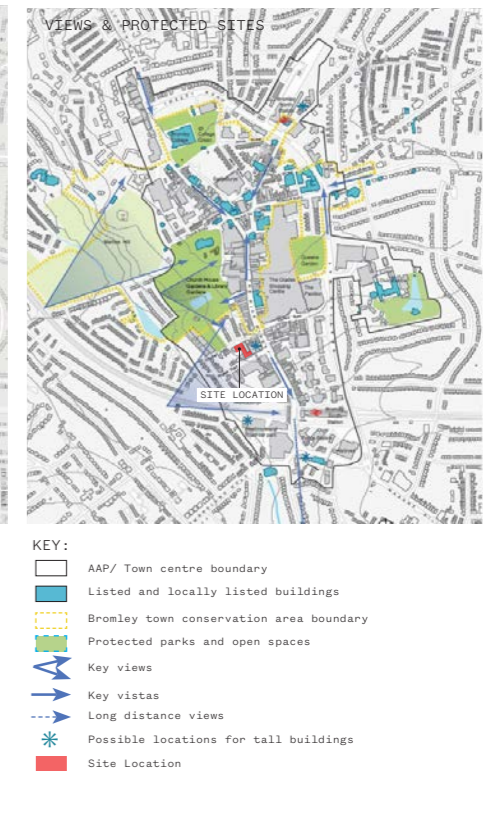
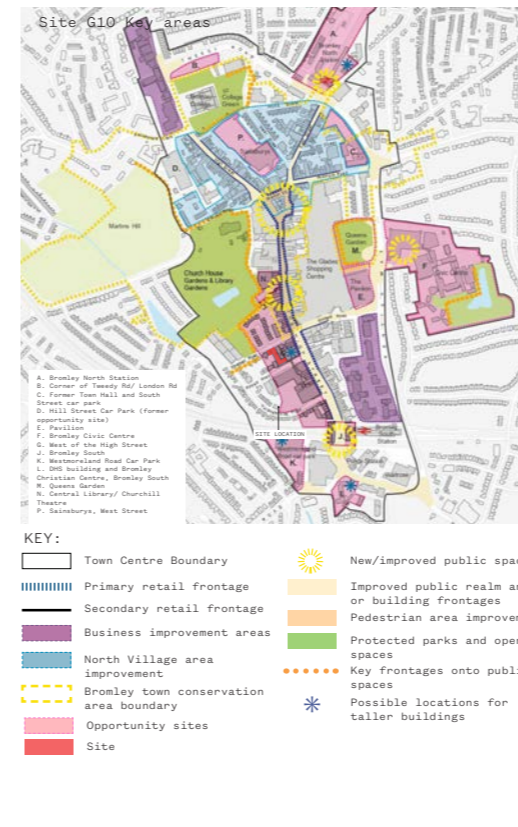
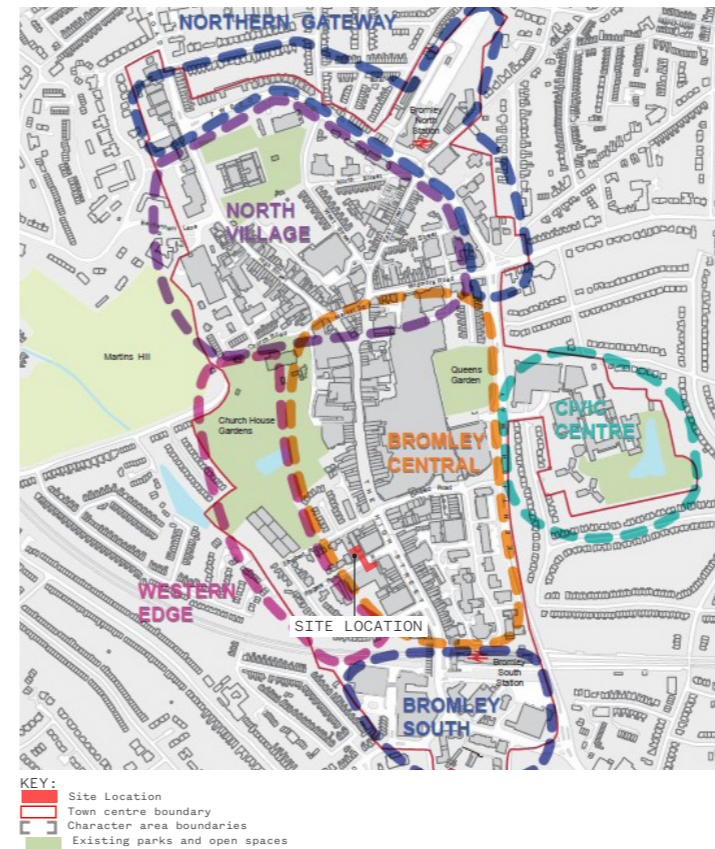
2.6. This work was done in collaboration with site owners and active engagement to ensure that identified sites were deliverable from a land ownership perspective.

2.7. This identifies 5 key development zones, to assist with phased delivery of the masterplan, and provide a range of building heights which together meet the required mix and quantum of development across the site, whilst responding to the existing character of the town centre. The application site lies within zone 2, which identifies a potential location for a taller building fronting Ringers Road.

2.8. The application site falls within areas suitable for development in the Bromley Town Centre Area Action Plan 2010, within Bromley Central.

2.9. The site specifically falls in opportunity site G of the AAP, which has been subject to a more detailed masterplan study in July 2018 titled 'Opportunity site G/10 Bromley, Masterplan'.

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



3.0 - Summary of Design Development

Project Timeline

Preapp 1 - BROMLEY LPA - 12th November 2019

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

3.2. The design team worked closely with Bromley Council and other stakeholders at key stages of the design process to develop the design. The initial site and contextual analysis was undertaken, and massing proposal with conceptual ideas was initially presented to the London Borough of Bromley Planning Department as part of a formal Preapp, followed by a preapp with the Greater London Authority and presentation to Design South East Design Review Panel.

3.3. The scheme has also been subject to extensive public consultation. Throughout this process the scheme has developed following advice and feedback from stakeholders and the public into the current proposals which represent a deliverable, appropriate and exciting development on an under-performing side street within an urban centre.

3.4. Final amendments made through the planning process as suggested by statutory consultees ensured the scheme was acceptable to all notable parties including London Fire Brigade, UK Power Networks and the Health and Safety Executive.

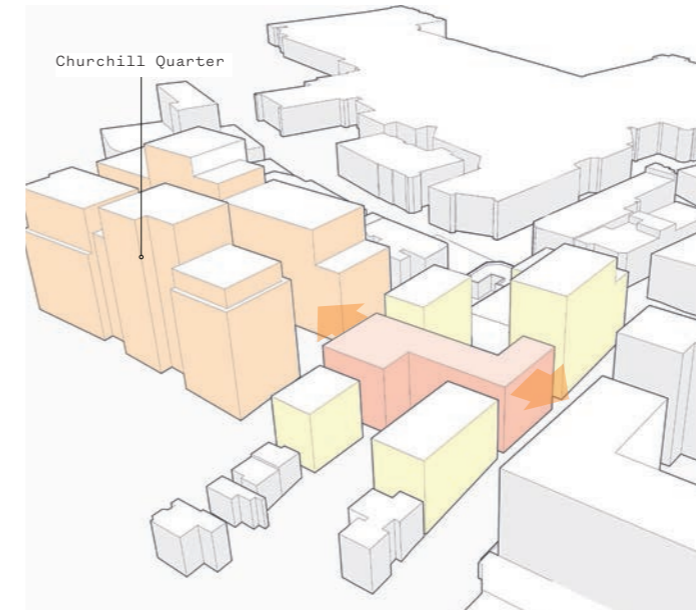
3.5. The following paragraphs explain the process and feedback obtained in further detail.

Hollaway Summary of Submission:

- 17 storey building fronting Ethelbert Road with 68 residential flats (one and two bed)
- 12 storey building fronting Ringers Road providing 45 residential flats (one and two bed)
- A total of 113 units

3.6. Our initial massing design was developed with the aim of maintaining and enhancing street frontage to the site, creating a separated building mass to allow for public realm and landscaping between buildings, with an angled and stepped plan to reduce direct overlooking, maximise views and natural lighting.

3.7. Sloping and stepped roof forms were designed to break up the proposed massing, maximise views towards views of Queensmead recreational ground, and creating new terrace spaces, whilst allowing sunlight to reach into the development.



1. Maintaining and Optimizing Street Frontage



2. Separation of buildings and introduction of landscape space



3. Stepped Roof-scapes on Existing Adjacent Blocks, Inform the Rhythm on Proposed Site



4. Angled Facade to Reduce Potential Direct Overlooking

Officers Response:

3.8. Officers were supportive of the proposal to develop this parcel of land for residential use as it forms part of a Housing Allocation site and stated that the provision of 113 residential units in this sustainable town centre location would make a positive contribution to the boroughs housing supply, and shared no concerns with a mix of 1 bed and 2 bed properties.

3.9. At the time of attending this pre-application meeting, a subsequent application for the corner of Ringers Road, where it meets the High Street (66-70 The High Street) was submitted, which include proposals for a tall residential building, and in response, we explored a taller massing to the Northern side of the site fronting Ethelbert Road, albeit deviating from the suggested location of a taller building within the AAP masterplan study, which was indicatively shown as 13-15 storeys and the Ethelbert Road block below 8 storeys.

3.10. Discussions with the LPA identified that the site would be suitable for a tall building, yet the written feedback suggested that the taller building would be more suited to the Ringers Road side moving away from the smaller dwellings along Ethelbert road, which would be more in line with the draft masterplan G/10 Site. Concerns towards daylight/sunlight impacts to Henry/William house were noted.

3.11. Within the written response, it was stated that '*there is sufficient justification for the quantum and scale of development being proposed*' however contrary to the discussion

within the meeting, it was noted that the council had significant concerns regarding the layout, height and massing of the development; its relationship to adjacent buildings and areas; and its impact on the wider townscape and neighbouring amenities, both as a standalone application and in wider masterplan setting.

3.12. The council requested us to review how the site could be developed as part of a masterplan framework for wider site allocation for cohesive regeneration. This was explored in depth, as explained in the following pages.

Hollaway Design Response:

3.13. Hollaway developed a masterplan for the whole block to inform how the site will interact with adjacent future developments. As a result, thorough analysis and design proposals were worked up for a theoretical masterplan based on information within development zone 2A of the Bromley AAP.

3.14. The taller building was relocated from Ethelbert Road to Ringers Road to provide a marker to the top of the high-street and to align with Bromley AAP and tall buildings masterplan. This was as requested by the council within the preapp meeting.

3.15. Integration of a new public courtyard at the centre of the development zone offers better pedestrian connectivity between Ringers and Ethelbert road.

Preapp 2 - BROMLEY LPA and GLA - 5th February

Hollaway Summary of Submission:

3.16. At the time of presentation to the council and GLA for the second preapp meeting, we had not yet received the formal written feedback relating to the initial Preapp.

3.17. Presented Scheme;

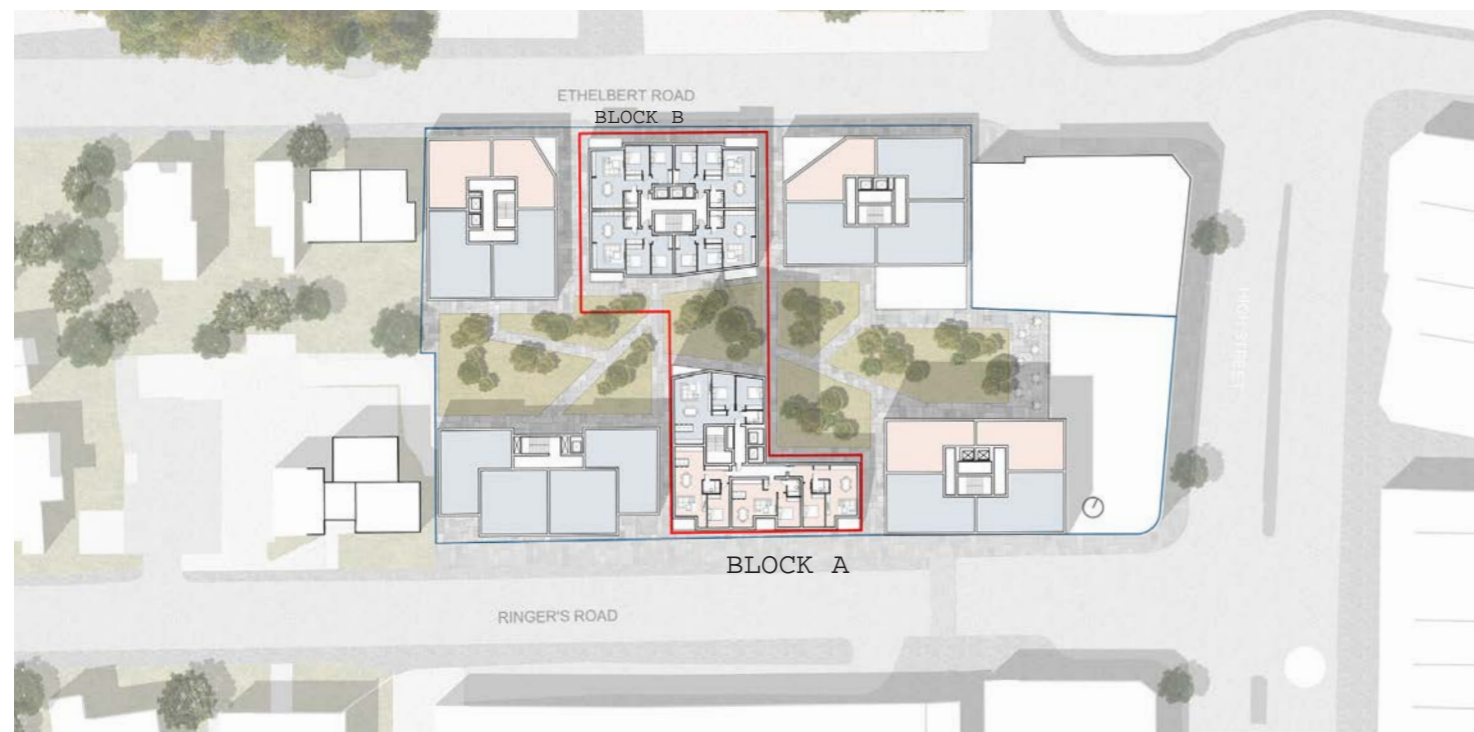
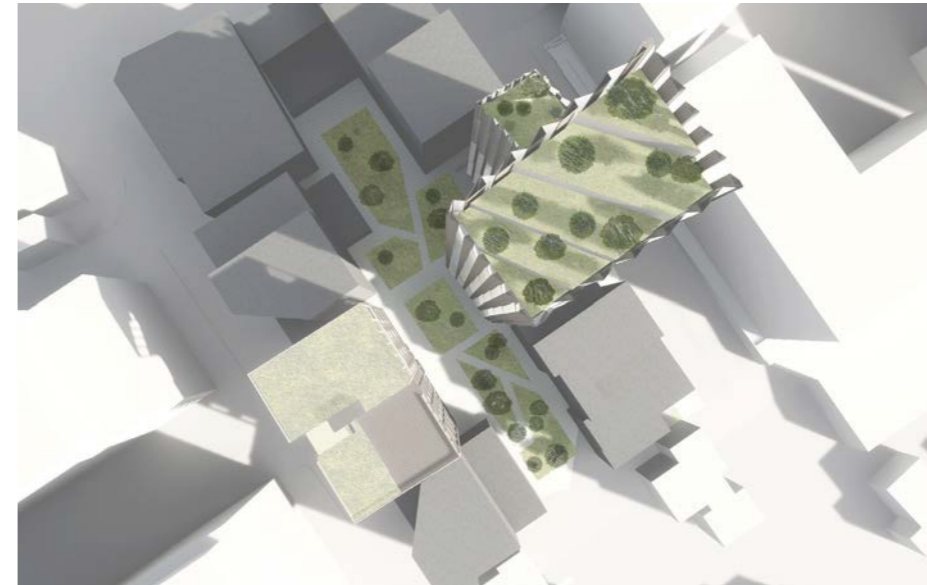
- 115 dwellings
- 43 x 1B
- 72 x 2B
- 18 storeys at highest point

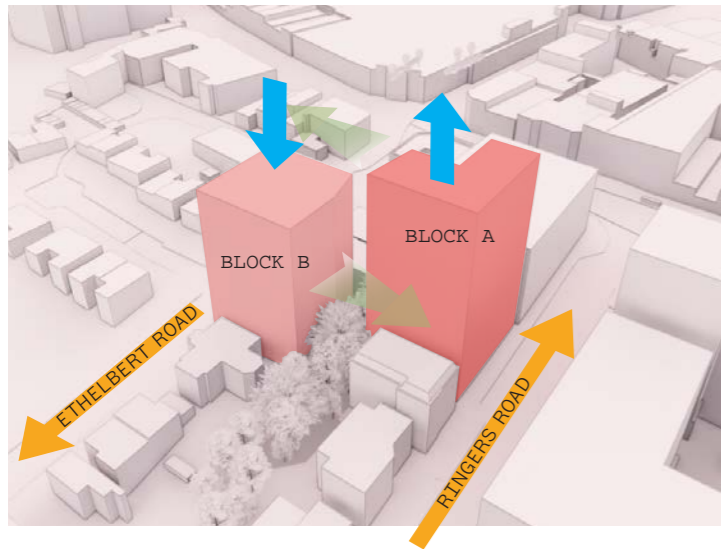
3.18. Pre-application meetings with the GLA further reinforced the appropriateness of this site for development, with emphasis put on its ability to trigger a regeneration of the wider block. Additionally, the council stressed the importance that any development on this site must consider a wider masterplan both in terms of connectivity and also awareness to avoid development which could compromise others sites from coming forwards.

Officers Response:

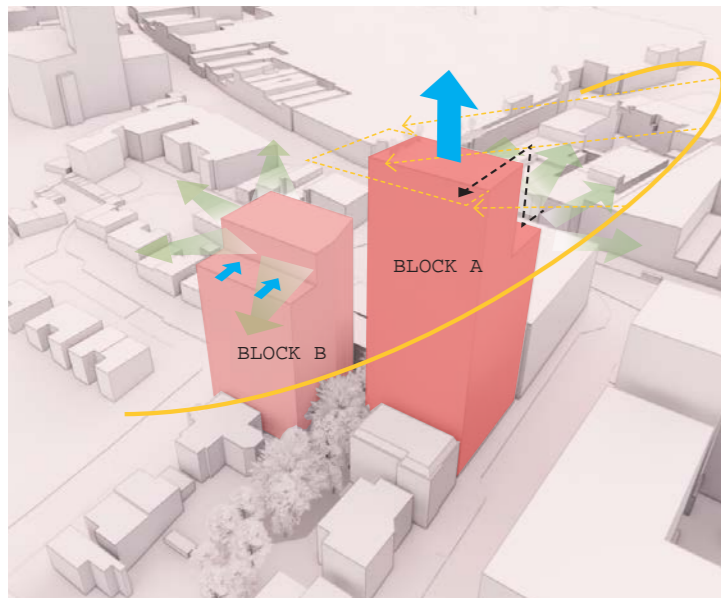
3.19. The feedback from the GLA stated that the application site forms part of a larger site that Bromley Council is looking to bring forward for more intense mixed use development. This is in line with London Plan policies that seek to optimise development in areas with good public transport accessibility and access to local facilities.

3.20. Additionally, the GLA stated that there was no strategic concern to the suggested building heights given the town centre location and noted the identification of site suitable for tall building within the AAP, however the impact on Heritage assets, locally important views and exemplar design quality was requested to be demonstrated.

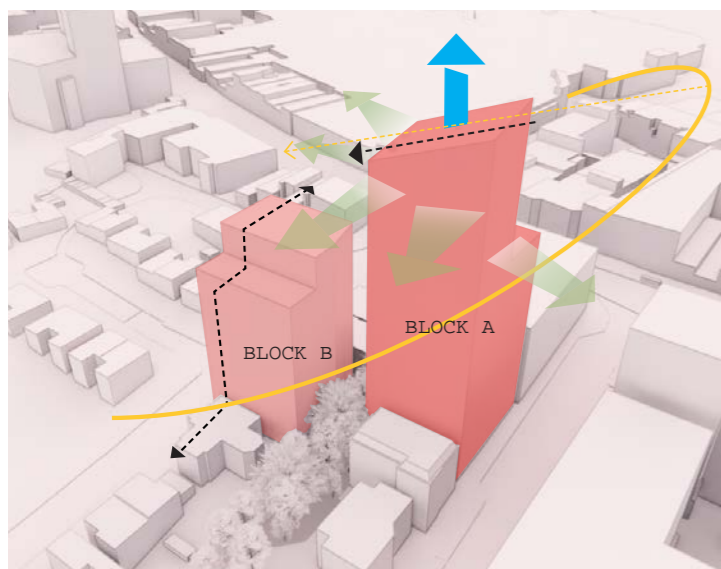




The taller element was relocated to front Ringers Road, which is in line with Bromley's AAP. The plan remains staggered to allow for views past each other.



Setting back the top floor aids in preventing overshadowing, forming a rooftop terrace for residents with views towards Bromley Park.



Extruding and sloping the roof of Block A would allow for more sunlight to reach into the units within Block A, and reduces visual massing of top of building.

Hollaway Design Response:

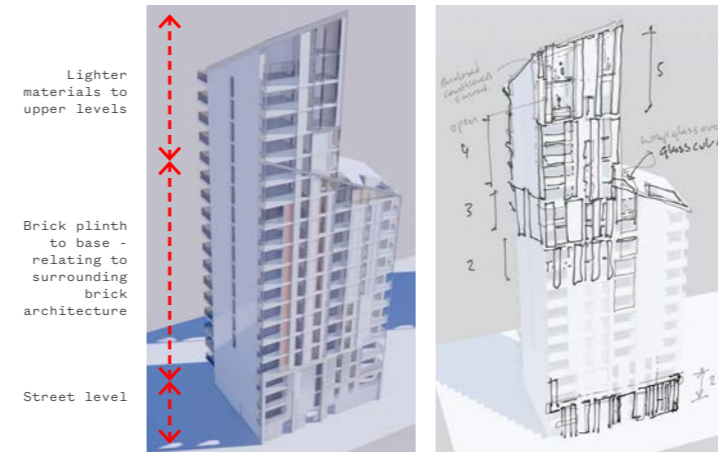
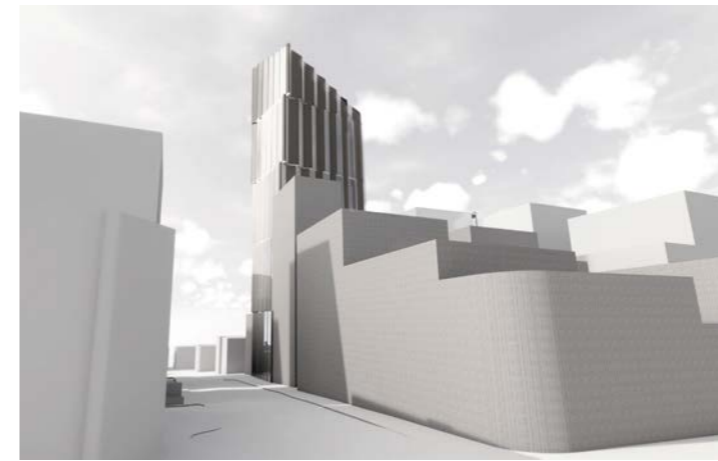
3.21. In response to this, rigorous understanding of local architecture features, materials, context, heritage assets was undertaken to understand the context of place, and as a result heightened emphasis was given to the designs at street level with more active street frontage and additional glazing and lighter materials to ground the building.

3.22. The middle of building introduced more intricate brick detailing with textured brick panelling, recessed balconies to add depth and texture to the elevation as well as creating semi-sheltered spaces for the residents.

3.23. The top of the building became a more slender design with lighter materials and more glazed areas with an angled/stepped massing. This was informed by views taken from the Conservation Area.

3.24. When looking further into the design of the building to fit both as a standalone building and as part of the wider masterplan, the plan of the buildings were interrogated so only secondary windows look out onto potential development sites. Angled windows to the Ethelbert building were introduced to avoid direct and indirect overlooking and if a future masterplan was to be delivered the adjacent buildings would not obstruct this.

3.25. Additional studies were undertaken to establish where the most appropriate location for this would be and working with consultants a 'tall building study' produced by EDLA collaboratively established acceptable levels of height, both at local street level, and to the surrounding areas of importance.

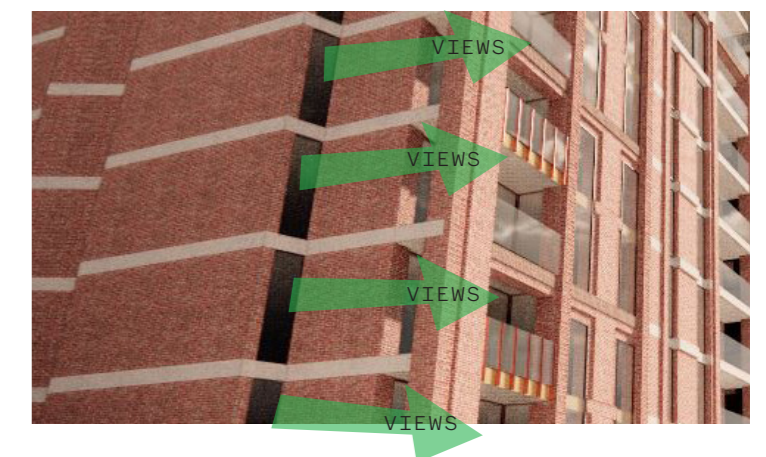
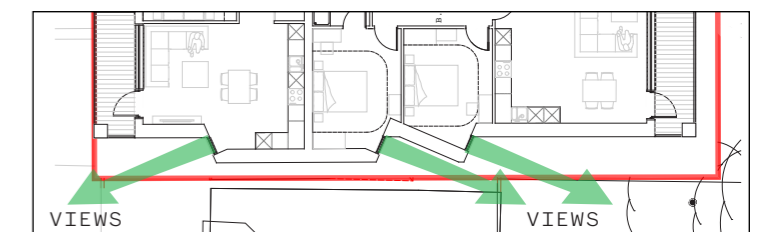
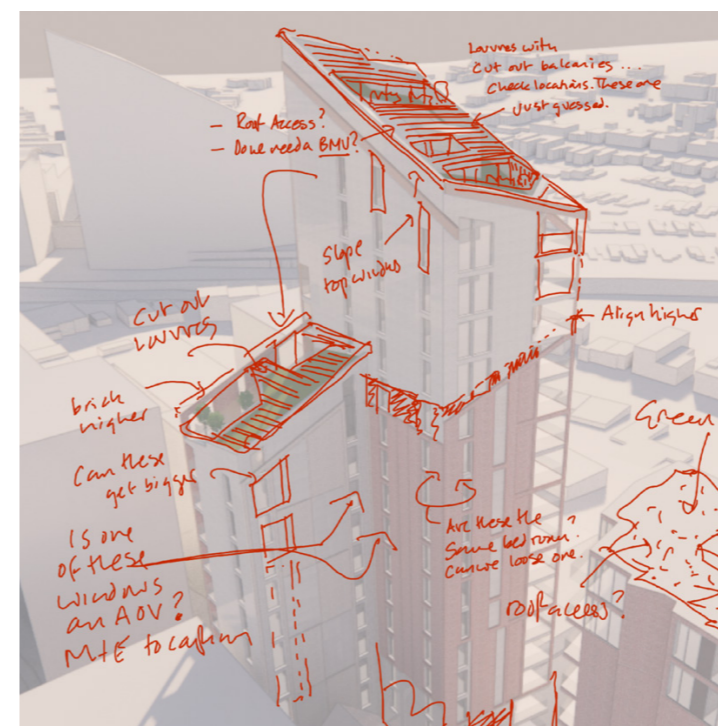


Images above and below explains the articulation of the facade of block B

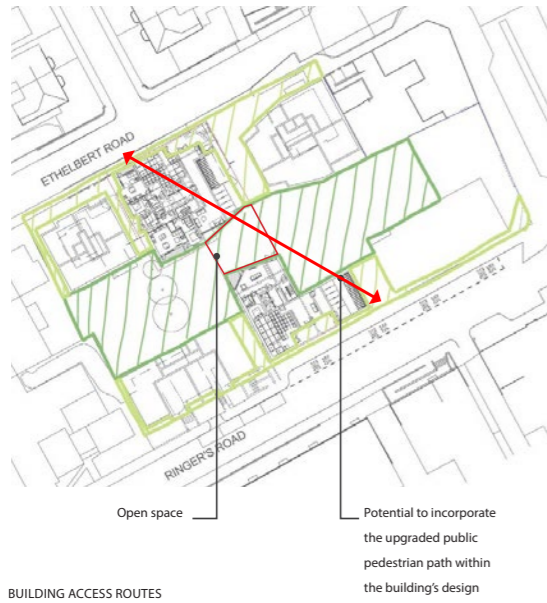


Image above explains the articulation of the facade of Block B

Image below showing the side angled bay windows within Block B and directs views away from neighbouring plots.



IDENTIFYING SPACES



BUILDING ACCESS ROUTES



CREATING PRIVATE AND PUBLIC SPACE



Diagrams above showing the landscaping concepts for the wider masterplan

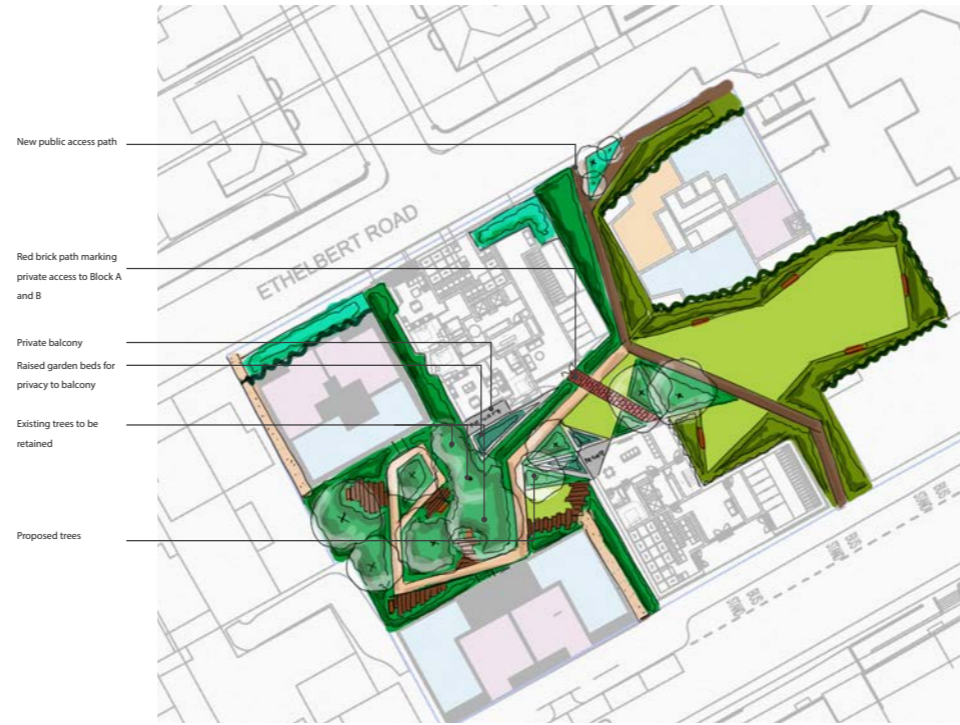


Image above showing the landscaping concepts for the wider masterplan



Image above showing the landscaping concepts for the wider masterplan



Image above showing the initial wider masterplan studies and building relationships by Hollaway

Public Consultation - 11th December 2020

3.26. The overall consultation process focused on a combination of online meetings, an online webinar and offer of hard copy materials and telephone engagement for those unable to engage digitally due to Covid-19 restrictions.

3.27. The public consultation online webinar was held on 11th December 2020. This consisted of a presentation of a number of informative slides explaining the scheme, with questions and answers at the end.

Prior to event:

- 2,530 newsletters were distributed
- 47 people registered for the virtual event

At event

- 25 people attended
- 63 questions were asked
- 33 feedback forms were received in total
- The website has had 626 site visits and 1219 page views to date.

Introduction of Cycle Cafe:

3.28. Out of the consultation, the idea of providing a cycle cafe for the community at the ground floor adjacent to the Salvation Army building.

3.29. As part of this public consultation, the applicant team held multiple meetings with the Salvation Army, and regularly approached the adjoining owners to see if a wider site could be assimilated as part of this scheme. None of these chose to come forwards at this time, however were keen to ensure that any development proposals that come forwards would not be hindered by this proposal, but act as a catalyst for their delivery.

1) The proposals would see approx. 115 new homes for Bromley. Do you agree that this site can assist Bromley Council's regeneration plans for the town centre and would be an improvement to the existing site?

Strongly Agree
 Agree
 Neutral
 Disagree
 Strongly Disagree

2) The site is located in the heart of Bromley Town Centre with immediate access to a wide array of shops and local businesses. Given its location, people living within the town centre will help support the shops and businesses?

Strongly Agree
 Agree
 Neutral
 Disagree
 Strongly Disagree

3) Do you agree that a tall building in Bromley Town Centre is a better option for providing new homes than building on green fields?

Strongly Agree
 Agree
 Neutral
 Disagree
 Strongly Disagree

4) Do you have any further comments?

Full Name _____
 Email Address _____
 Full Address _____

I would like to be kept informed of the proposals' progress
 I agree to have my data kept in accordance with the disclaimer and I acknowledge that I have been given access to the data privacy notice for this project.

SEND

PUBLIC CONSULTATION PRESENTATION SLIDES

Why build up?

A number of towns like Bromley around the M25 are embracing well designed, tall buildings because they provide:

- An opportunity for people to work and live closer to public transport hubs and town centres.
- A focus for town centre regeneration
- Most importantly, a way of meeting housing requirements WITHOUT building on much loved green spaces and ultimately the Green Belt

Bromley development wider masterplan

The Details

ETHELBERT ROAD

- 1 Bed Unit
- 2 Bed Unit
- Development Zone 2A
- Site Boundary

Delivering High Quality Residential Development

THE PROPOSALS

- Mixture of one and two bedrooms
- Approx. 115 new homes
- Affordable housing helping those onto the property ladder and in need

19 storey building fronting Ringers Road providing approx. 65 homes
 14 storey building fronting Ethelbert Road providing approx. 50 homes

The Opportunity & Community Benefits

This landmark scheme will be the catalyst for further investment and the regeneration required to deliver Bromley's wider masterplan. The scheme will also deliver improvements to the public realm.

CONSTRUCTION PHASE

- 151 Jobs (direct and indirect)
- £281,871 per year - Construction Workers Local Spend
- £65m GVA Impact

COMPLETED DEVELOPMENT

- Initial Homemaking Spend: £2,200,000
- Total Household Spend: £2,900,000
- Local Spend per year: £630,000
- Council Tax per year: £180,000
- New Homes Bonus: £847,000

The site is part of Bromley's Local Plan
 Within the designated Bromley Town Centre Opportunity Area
 Identified as a location suitable for a tall building in the Area Action Plan
 Brownfield site
 Great location close to High Street and station

Design Review Panel - April 2021

3.30. An important part of the process was to take the emerging proposals to DRP. Below shows a summary of the feedback (in italics) given by the panel, with our narrative on design below.

1. *Reconsider the height and scale whilst providing a narrative for a tall residential building.*

3.31. Tested against townscape assessment and lowered from 19 to 14 storeys to align with the Churchill Theatre, dropping further to 12 storeys towards the high street.

3.32. Form amended to take account of second stairs. Cafe and co-work space added below the taller element to make show hierarchy of building uses.

2. *Study the topography and residential context further so that sloped site assists with a sensitive transition from commercial high street uses to residential uses.*

3.33. Elevational treatments have been considered to offer a different approach with the lower floors offering a clear distinction from the building above to take note of the stepping site and town house context. This has been done with consideration that it does not appear at odds with any architecture that may come forwards on adjoining sites in the future. An entrance level architecture stacks with the lower stepping town houses whilst making the distinction to the residential above.

3. *Consider changing scenarios over time ranging from the Salvation Army building remaining for the foreseeable future to complete renewal of all adjacent buildings - and ensure the proposal works equally well irrespectively.*

3.34. The designs have been interrogated alongside a hypothetical emerging context, which was explored through parameters given from the guidance within Site G10 alongside consideration of the consented proposals on the adjoining site.

3.35. The wider frontage on Ethelbert Road can accommodate a pedestrian link to the central space, or cross the block in a future phase. The commercial offering to this part of the ground floor wraps under the building to address this linking route.

4. *Produce and environmental strategy and ensure sustainability principles are embedded in the design proposals.*

3.36. A large consultant team has produced a full design solution to not only consider sustainability but to develop a full strategy to ensure the deliverability of this site with both be sustainable in its construction and operational stage. A whole life carbon assessment has also been undertaken. This has been linked to the economic viability consideration noting that the financial sustainability of town centre is also supported by this proposal.

5. *Create a community or civic offer at ground floor level potentially in connection with the Salvation Army,*

informed by meaningful engagement with local stakeholders and council.

3.37. Following DRP the applicant team consulted widely on the project and settled on the opportunity of a cycling café and workshop space woven into the proposals. This would not only support the residents but also the active cycling community of Bromley.

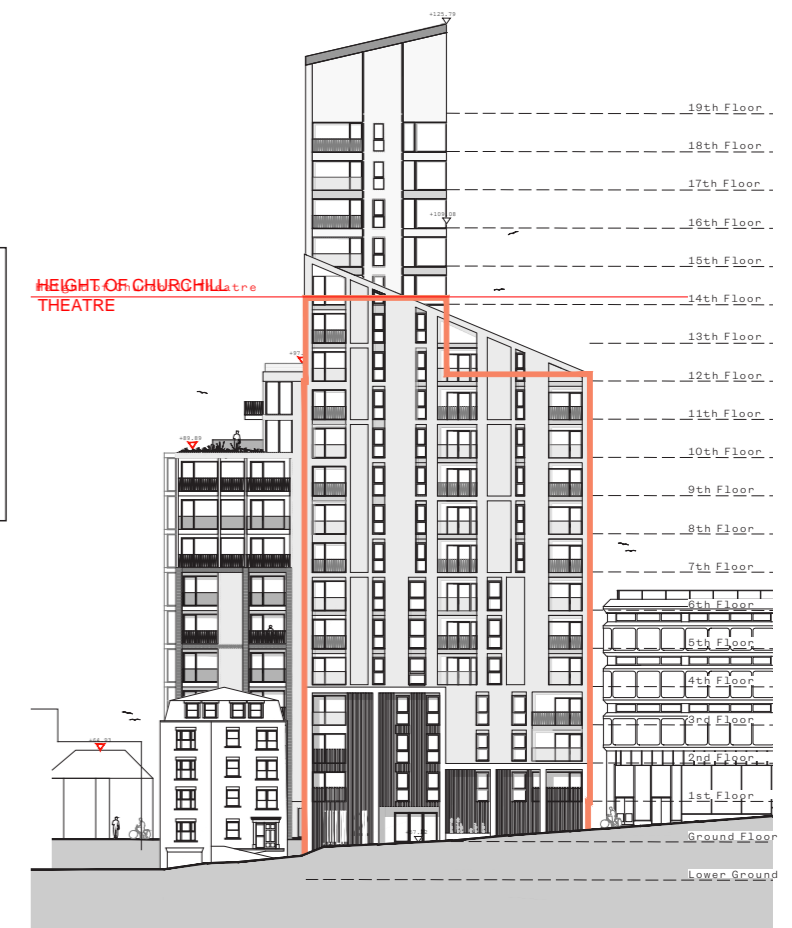
3.38. The resolution to this was a co-work space and café with the opportunity for residents to have a space within the building avoiding the need to work in bedrooms, whilst supporting the existing cafés and amenities offered in the town centre. This also gave further emphasis to the activity at street level whilst encouraging more use to the green space between building.

6. *Introduce generous and communal play spaces that will make living in this development enjoyable. Greater consideration should be given to how people will meet their neighbours and form a community.*

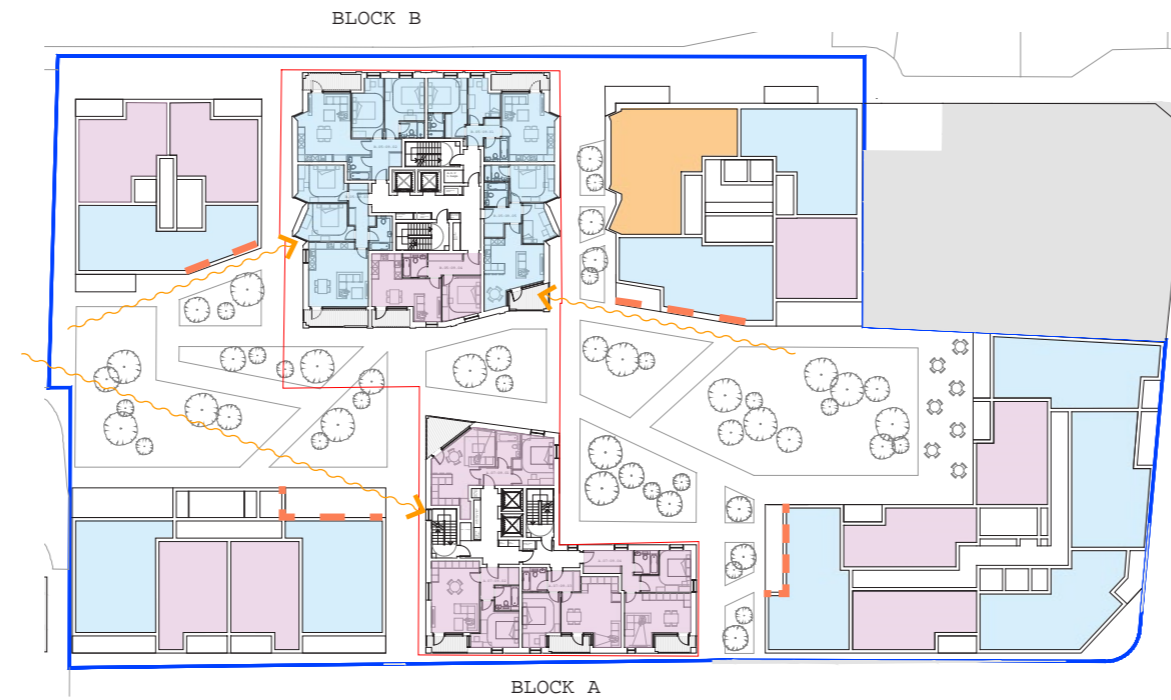
3.39. Despite the shape and size of the site, a play space has been woven into the middle of the plan which would not only support this site, but also be the starter for a full swathe of play space folding down the central spine of the masterplan within its urban block. This spine would sit separate to the adjacent roads to offer a private and protected play space directly adjacent to the apartments.



Images above show the reduction in height to Block A post DRP feedback



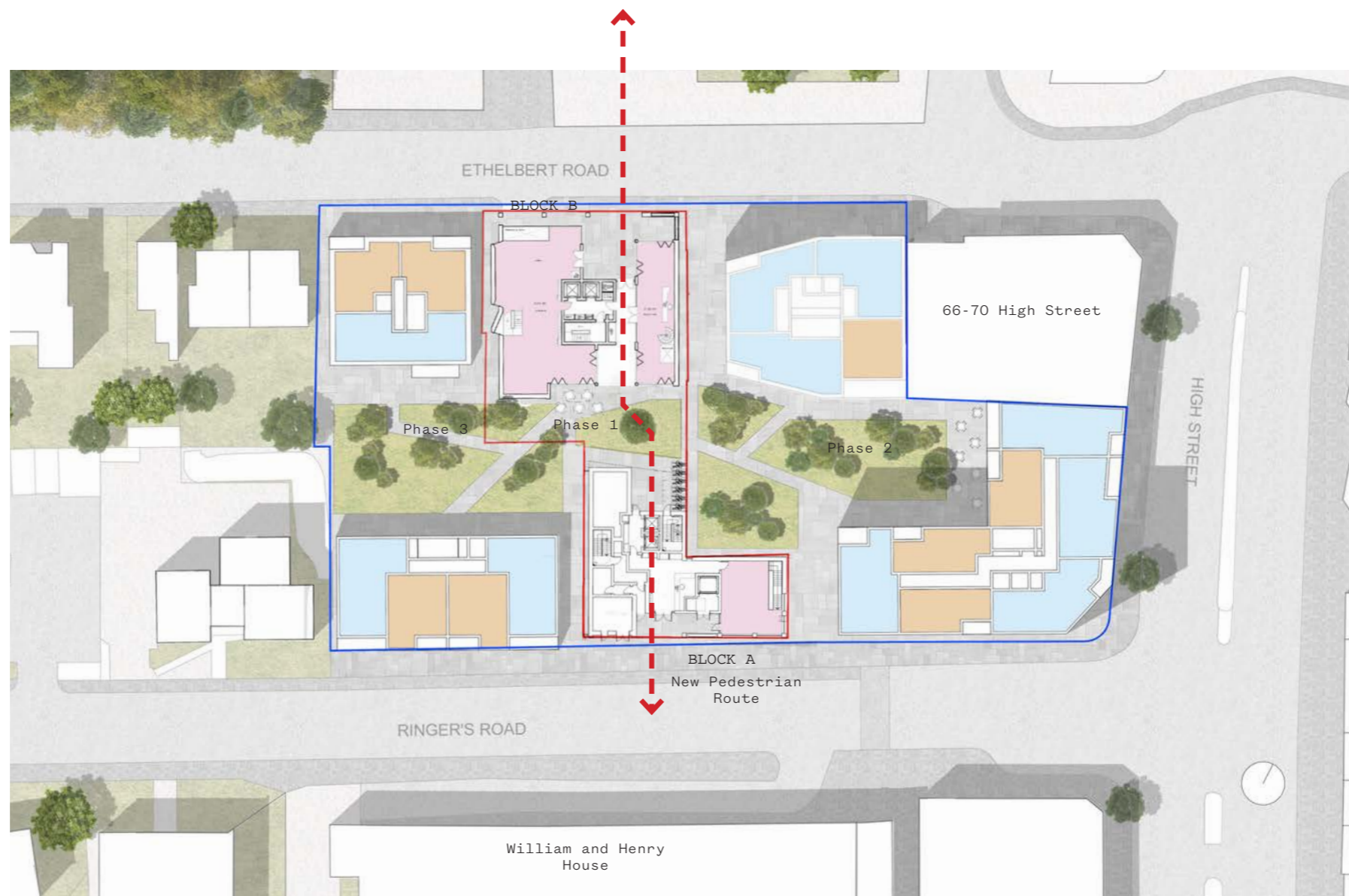
Drawing above shows reduction in height to Block A with relation to the Height of Churchill Theatre



- KEY ANGLES AND FORMS WHICH INTERACT WITH PROPOSAL
- ~ SUNLIGHT AND DAYLIGHT

Image to the left shows exploration into the wider masterplan and relationship to the proposed buildings.

Typical Floor Plan



- 1 BED UNIT
- 2 BED UNIT
- 3 BED UNIT
- COMMERCIAL USE
- DEVELOPMENT ZONE
- SITE BOUNDARY

GROUND FLOOR

Image to the above shows landscaping connectivity of the site in relation to the wider masterplan development.

Initial Planning Submission - October 2021

3.40. The proposal is for a part 14, part 12 storey building next to Bromley Town Centre, facing onto both Ethelbert Road and Ringers Road. There are a total of 94 dwellings within two blocks altogether, including a mix of 1-bed, and 2-bed units, with the majority being dual aspect (South East facing only), and all in excess of GLA space standards. The ground floors offer community uses such as co-working spaces and a bicycle cafe.

Block A

1 bed: 24

2 bed: 21

Block B

1 bed: 13

2 bed: 36

Overall Total : 94 Units (9 x M4(2))

1 bed: 37 (39%)

2 bed: 57 (61%)

Car parking

2 disabled car parking spaces (external to site)

Cycle storage

Standard cycle spaces: 211

Electric adaptable cycle spaces: 11

Electric cycle spaces: 28

Total: 250



CGI images of the initial design submission for Planning Approval, in context.

Consultee Responses

3.41. To deliver a tall building within the new context of fire and other regulations on a constrained site is challenging. This scheme is a compliant and through close working with the team and consultees has no objections from the HSE or London Fire Brigade.

3.42. All other architecturally related statutory consultees raise no objection to the proposals. The comments from the Local Authority Design Officer to not offer any substantive or reasonable assertions and do not follow the feedback of the Expert Design Review Panel.

3.43. The officers report notes the design as 'unacceptable'. This is in terms of optimising development capacity, layout, relationship with adjacent plots and other matters picked up in later sections of this note.

3.44. All of the these design factors have been considered in detail to resolve a high quality and bespoke building that understands its context of an emerging wider masterplan without detriment to the existing. It maximises dual aspect units in a variety of sizes that have an appropriate level of glazing and outlook to all units.

3.45. Fundamentally, it is not the case that this would 'prejudice...adjoining plots' (para 6.4.11) but actually enable them.

3.46. Comments in the officers report on height, scale and massing are contradictory, (para 6.4.15 - 6.4.20), resisting a narrative that considers a masterplan led approach, whilst supporting it in the later stages. There

is limited reference to the extensive work done to understand and interrogate the height, scale and massing and no quantitative response on why it is classified as unacceptable.

3.47. Comments in officers report on appearance (para 6.4.31-6.4.35) do not coherently consider the constraints and opportunities of the site. The building does reference its context and understands how façades can be articulated with depth and shadow, preventing overlooking to both the existing and future arrangements.

HSE Comments 12/12/2022:

3.48. Incorporate second staircase - concerns regarding single staircase to residential units, lifts and stairs extending to basement, and residential stairs serving commercial units.

Urban Design comments 19/12/2022:

3.49. Height and massing should be considered and appropriate to optimise rather than maximise development.

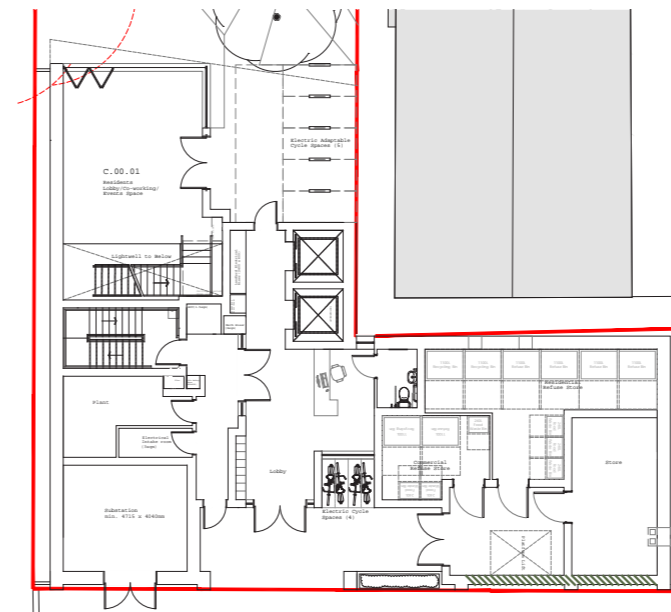
3.50. Design, layout, massing and density considered over-development of site and raises concern of residential quality.

3.51. Separation distances around 8-10m but draft masterplan shows larger distances with increased amenity space between, and less tall buildings.

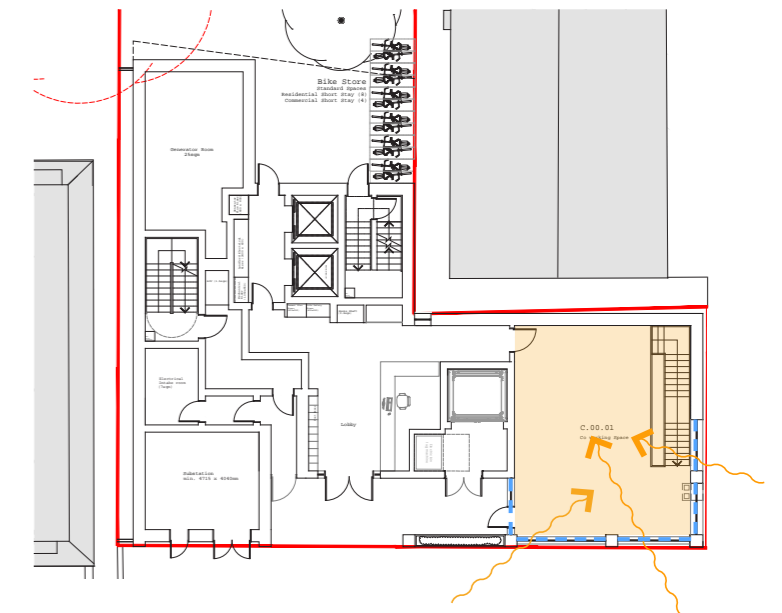
3.52. Bromley Town Centre Area Action Plan (2010) which is considered to be imperative by the applicant, however, this document has been largely superseded by the Bromley Local Plan (2019) and the London Plan (2021).

3.53. Block B excessive in scale

and height compared to character of Ethelbert road. Taller building on ringers accepted, but not at 14 storeys exceeding height of Henry House.



Block A - Previous Ground Floor Plan



Block A - Revised Ground Floor Plan



Block B - Active Street Frontage



Block A - Revised Street Facing Elevation in Future Masterplan Context

Hollaway Design Response:

3.54. The design was revised as a result of a design process that incorporated the following changes:

3.55. We created a more active frontage to Block A. A two storey co-working lounge was introduced with more glazing facing the street and taking into consideration the future development of surrounding sites.

Fire safety:

3.56. A second stair was introduced to both blocks for Fire escape provision.

Overheating and Daylight Sunlight:

3.57. Since the original application new regulations came into force to ensure overheating is considered earlier in the design process. And has updated the rules on Daylight & sunlight.

3.58. The new layouts have been comprehensively tested to ensure compliance with these stringent new targets, with increased glazing areas to side elevations and bay windows to improve daylight/sunlight and in turn improving architectural balance between solid/glazed façade.

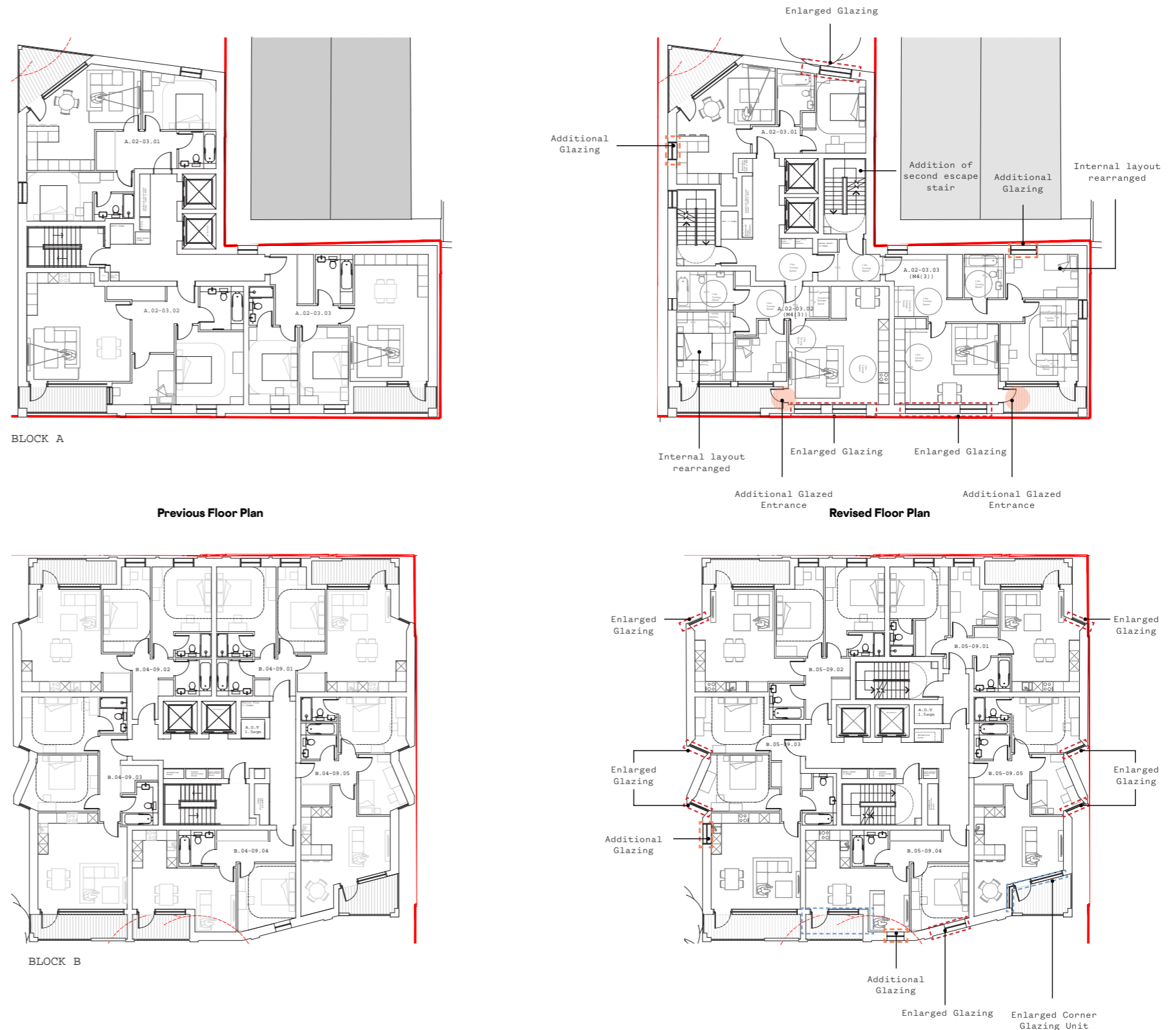
3.59. A positive consequence of the daylight sunlight testing is that we have been able to enlarge the areas of glazing to the side elevations and bay windows improving the architectural balance of glazing to solid facade.

3.60. Overall the unit numbers have remained the same.

Original Application - 94 units overall.

Revised Application - 94 units overall

Block A 45 flats and Block B 49 flats.



Images above show amendments to the floor plans following consultee comments

66-70 High Street

3.61. The planning permission 66-70 High Street was granted on appeal on 21st November 2022, for the construction of a 12 storey building on the high street with a total of 47 flats.

3.62. Internally, the layout comprises at lower floors 5 residential apartments which use the existing building fenestration. This results in 2 x single aspect north east facing residential units with minimal frontage and are very deep in plan proportions.

3.63. The TK Maxx building sits directly adjacent, affecting the ability for side facing windows at second and third levels.

3.64. At fourth floor, the proposals include an extension to the existing building which has been slightly set back. 2 x residential units look on to a narrow and constrained light well that looks directly onto the side elevation of TK Maxx, which would comprise of a flank brick elevation.

3.65. Above this, from 5th to 11th floor, the plan adjusts to 45 units per floor, all with dual aspect, albeit 2 flats per floor offering poor aspect looking over the top of the TK Maxx building, and also over 'The Light' building which would limit the development potential for both adjacent sites, contrary to the intent of the Bromley AAP Masterplan and general development principles.

3.66. Externally the proposed new building extends from the existing high street building which is identified of having considerable townscape value. The proposal looks to retain the existing frontage with the new build residential

block set back from the high street towards Ethelbert Road.

3.67. The elevation contrasts the existing building, with a repetitive facade of mitred panels made with pre-cast concrete/GRC Panels with bolt on balconies.

3.68. The design and access statement gives reference to the materials reflecting the architecture of the Churchill Theatre, which alongside the repetition of the facade gives more of a commercial visual to the architecture of the building rather than residential which gives limited narrative around the use and architecture. Further to this, rather than reflecting the character of the immediate local context, which was described by the Heritage officer as a modest market town character.

3.69. No commercial use at ground floor does not define how the building meets the ground on Ethelbert Road.



CGI showing the approved 66-70 High Street Development



Lower floor plan of 66-70 High Street showing single aspect units at frontage of building

Typical plan of 66-70 High Street showing internal layouts and compromised dual aspect units and light well



Elevations above show the relationship of block B to the approved 66-70 High Street Development

4.0 - Reasons for Refusal

Reason 3

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

4.1. It is our professional opinion that this reason for refusal is not considered to reflect the extensive design journey that was undertaken in the build up to this application. With the town centre site, the Bromley AAP, extensive pre-application development and a great deal of time spent on understanding the development within an existing and future context, this reason for refusal is not in line with the work done to bring this proposal forward.

Scale/Height/Massing:

4.2. As identified and designated with the Council's own masterplan study, this site is specifically highlighted as a suitable location for a taller building. As such, a tall building on the site should not be considered inappropriate. The tall building assessment and townscape analysis work established

appropriate building heights that would not cause harm to the area while pre-discussions with the LPA concluded the appropriate location for the taller element of the proposal within the site.

Block A - Ringers Road

4.3. It was accepted during the consultation with the GLA and Bromley Council that this area of the site should be the taller building, and it was suggested to reference the height of the Churchill Theatre which was duly accommodated.

Block B - Ethelbert

4.4. Reason 3 also refers to the Appeal scheme being out of context with its immediate neighbours. In my judgement, whilst the overall height is larger than the existing neighbouring buildings, the street frontage has been specifically designed to ensure that the building does not feel incongruent with its immediate setting. Pre-application discussions with Bromley Council assisted in highlighting the importance of the street scale, and as such, the scale of the proposal was changed significantly to address the street.

4.5. A concrete framing at ground level was introduced to the base of each building to ensure that the proposal is grounded, and reflects the scale of neighbours whilst providing an effective design solution in material, form, and scale.

4.6. In my professional experience, designing taller buildings in constrained sites is key to ensuring a delivery of much needed housing supply - refer to my colleague Mark Batchelor's Proof. It is my view that

the Appeal scheme successfully addresses the street, and as such, provides an appropriate scale of development at street level.

4.7. Both blocks are articulated to be sympathetic to the various established heights within the Bromley town centre skyline, more immediate context and in relation to the future vision of the area. Ethelbert Rd and Ringer's Rd slopes down in a South-West direction towards a small residential setting. Ringer's Rd has a taller defined height in comparison to Ethelbert Rd and the transition in heights of the proposals reflects this both in overall height and in the stepped design of the lower level concrete architectural elements.

4.8. Block A faces onto Ringer's Road and at a high level, steps down towards the High Street reflecting the taller William House. Block B faces onto Ethelbert Rd and steps down towards the residential area down the street. This stepping of the overall height, while not perceivable at street level has been articulated through the use of architectural features and material changes at the ground/first floor. It is my professional opinion that the scale and height of the proposals are successful in this location and take into context the Bromley Town Centre skyline and immediate context.

4.9. Officer reports which accompany the refusal suggest that the design should be more considered, proportionate and sympathetic to neighbouring plots. Architecturally, and with consideration to the analysis undertaken within the Townscape Visual Impact Assessment and tall building assessment work, the

reason for refusal is contradictory with the wider AAP masterplan aspirations in bringing forward adjacent sites.

4.10. It is my professional opinion that the design has been carefully considered to be sympathetic to current and future neighbouring buildings. The layouts of the apartments ensure minimal overlooking and it takes into account the potential future high level buildings. Whilst this has resulted in façades with less fenestration, feature brick patterns have been employed to keep the façades visually interesting. It will be argued that such design features are an acceptable and not untypical solution found throughout London and enables the design of buildings that are sympathetic to future neighbouring developments while still providing acceptable visual interest within its current setting.

4.11. It is evident from the scheme that was granted permission by appeal at 66-70 High Street that the proposals need to consider the future masterplan. It is my professional opinion that we have taken a well balanced approach that takes both existing and future context into consideration.

4.12. It is also contradictory to the approved scheme adjacent which would otherwise make the same transition, but to a greater extent due to the levels involved.

4.13. When considering a lower building, I consider that a smaller building would create an inappropriate proportion by way of its overall design. A shorter building would create a more stout proportion, resulting in a building

which would appear significantly more bulky and overbearing at street scale. The height of the building assists in creating a varied and slender proportion to the street scale.

4.14. With the AAP future masterplan in mind, side angle windows introduced to break up the blank elevations and to increase the daylight and outlook to the units. This design solution not only increases the dual aspect units, but also articulates the façades with depth and shadow along with the brick detailing to create visual interest.

4.15. It will be argued that the relationship proposed between the blocks is not untypical of the kind of relationship found in any regenerated town centre in London and further afield and that the approach to the design and site layout, including the use of angled windows, is supported by the Housing Design Standards LPG.

Tall Building Assessment

4.16. The Tall building assessment was undertaken at preapp stage in 2021 with the buildings at 17 storeys, to inform the design, massing and height of the building.

4.17. This study also looked at the impact skyline and conservation area - Through analysis of key views, with the consideration of St Mark's Square and Henry's House providing a backdrop to the conservation area of greater height, it was notable that the height was in excess of what we felt was appropriate and therefore the building was subsequently lowered from 17 storeys to 14.

4.18. The officers report seems to comment on this however this is out of date and was used only to inform the proposals on height and impact to the surroundings.

Out of context with immediate surroundings:

BLP Policy 42 states proposals adjacent to a conservation area will be expected to preserve or enhance its setting and not detract from views into or out of the area.

Planners suggested massing visually overwhelms modest market town character of the Bromley town centre conservation area. Would cause negative cumulative impact which would be against Historic England's guidance on the setting of heritage assets.

It is the conservation officer's view that the resulting cluster of the high-rise buildings would cause less than substantial harm to the setting of the designated heritage asset

4.19. The site is not within a conservation area - The nearest conservation area is the Bromley Town Centre Conservation Area, which covers the oldest part of the town, ending where the high street meets Ethelbert Road.

4.20. Whilst there is no Conservation Area Appraisal to refer to, the existing context is diverse in terms of architecture with brutalist structures along the high street and smaller, lower Victorian terraces stepping down the topography. The site here falls as part of the transition between these typologies which can be seen in how the elevational treatment to the proposal

has been resolved.

4.21. There are not statutory listed buildings within the immediate context. The Church of St Peter and Paul (grade II* listed), sits to the North of Bromley park, over 300m from the site. There are some locally-listed buildings on the high street.

4.22. The site is bound primarily by residential houses of a varying scale to Ethelbert Road and flatted developments to Ringers Road with various commercial uses to the West abutting the High Street. To the North of the site is Ethelbert Close, which is a residential area backing on to Bromley Park Conservation Area, that has also been identified as an opportunity site.

4.23. Outlook - refer to Refusal reason 4



Visual showing Block A in context with adjacent buildings, including the recently approved 66-70 High Street development



CGI showing the active street frontage and stepping down of eye level architecture from the high street to the smaller scale residential properties along Ethelbert Road.

Reason 4

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

4.24. The London plan 2023 revision came into effect after application was submitted.

Single Aspect Units:

4.25. The London plan 2023 revision came into effect after application was submitted, which has provided further detail and clarity on what should and shouldn't be considered a single aspect unit, at the time of the application the design was in line with the previous guidelines (London Plan 2021) on Single aspect units.

4.26. In line with the suggestion within the London plan 2021, any single aspect units within the scheme have been designed to not face North and be restricted to a home with one or two bed spaces.

4.27. Whilst there are some units defined as single aspect, these have been carefully designed to be South East facing, with recessed balconies and windows facing both South & East, sometimes referred to as 'enhanced aspect' giving both views away from

William and Henry House directly to the South.

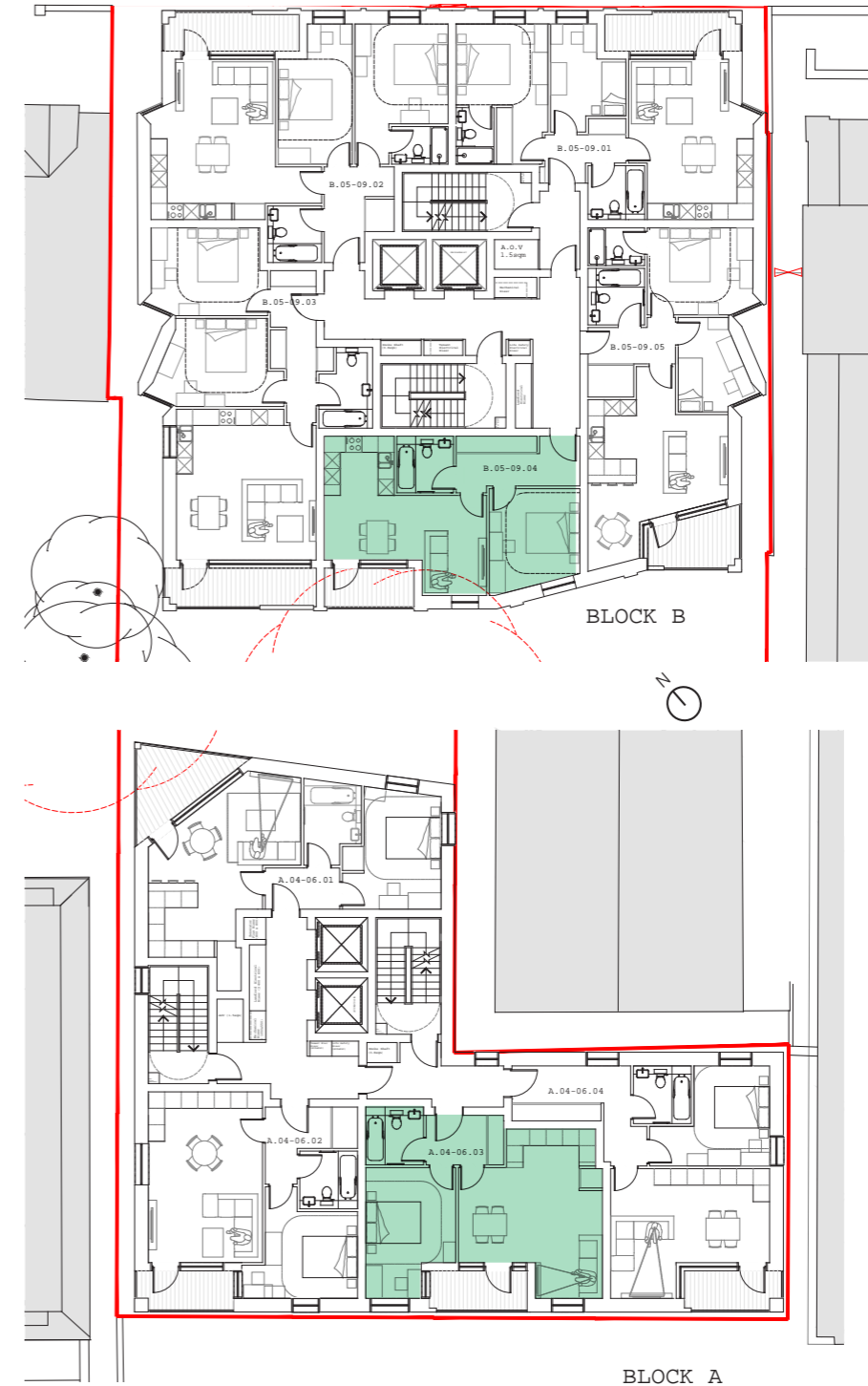
4.28. The design of the façade and the layout of the apartment carefully balanced the need for solar shading, with generous frontage to ensure adequate ventilation, as well as views and some privacy to the balcony spaces.

4.29. There is no definition within the London plan that suggests a secondary window providing dual aspect is to provide a secondary means of outlook, but states it must enable passive/natural ventilation across the dwelling.

4.30. On the contrary, the superseded London plan suggests that the provision of bay windows can optimise daylight and sunlight and allow buildings to be closer together than can otherwise be achieved.

4.31. The design guidance is limited when considering restricted sites with town centre locations that are to consider future development plans. But our solution of a smaller openable bay window to each room on the flank elevations, again balances ventilation and daylight provision both in the current and future masterplan condition.

4.32. The London plan 2023 revision came into effect after application was submitted, which has provided further detail and clarity on what should and shouldn't be considered a single aspect unit, at the time of the application the design was in line with the previous guidelines (London Plan 2021) on Single aspect units. We would state that whilst not in our remit, our scheme would still provide a high level of compliance against the new guidelines.



Floor plans above highlighting single aspect, South East facing units on a typical layout

Unit Type	Single Aspect North	Single Aspect	Dual Aspect	Triple Aspect
Social Rent	-	1	5	-
Shared Ownership	-	1	3	-
M4(3)	-	3	3	3
Total (all tenures)	0	20	52	22
Proportion	0%	21%	55%	24%

Table above by Mark Batchelor showing total number of single aspect units across the scheme

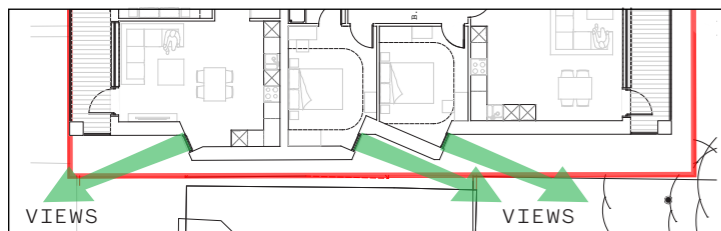


Diagram showing angled bay windows to Block A

Poor Outlook/Mutual Overlooking:

4.33. The building mass, balconies and windows have been designed to be angled away to avoid direct overlooking - whilst the committee report suggests a minimum distance between the proposed blocks at 8-10m, our proposals are in excess of 11m at its tightest between the two proposed blocks.

4.34. Further to this, the design of the units have been planned to that the windows are staggered and that any bedroom is located opposite to a kitchen/Living/Dining area with recessed balcony to provide a level of privacy.

4.35. The central open space between the blocks has been carefully considered to feel active and vibrant but without an oppressive feeling.

Provision of Childrens Playspace:

4.36. Whilst the site is capable of providing a communal amenity space with opportunities for informal play (see details in Mark Batchelor's Proof para 6.67 to 6.70) , this is considered to be an appropriate level of provision in this town centre location.

4.37. The internal courtyard space is intend to kick-start a continuous courtyard design throughout the future masterplan, giving a safe space for families to gather with their neighbours and enjoy.

4.38. There is excellent existing provision within 2-3 minutes walk of the site with the playgrounds at Church House gardens including an extensive playground and skatepark.

Daylight conditions

4.39. Please refer to summary proof of evidence by Tom Keating for detailed response. It is our opinion that considering the town centre location and surrounding levels of development the daylight levels achieved are favourable.

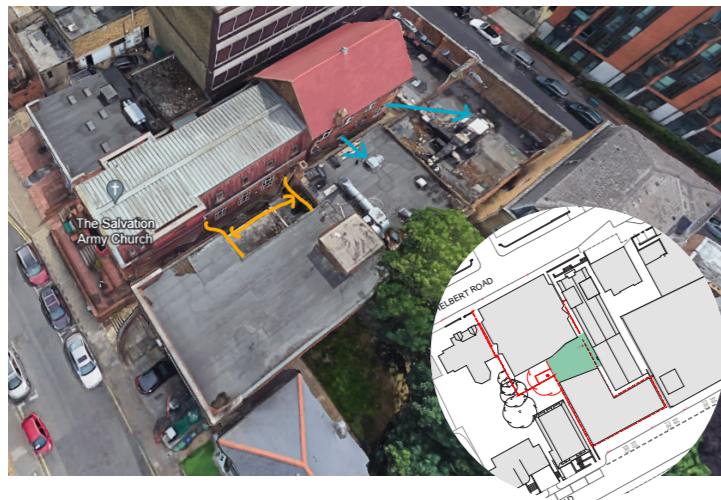


Diagram showing window to window separation distances on site, and floor plan layouts showing opposite room types.

Reason 5

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

Salvation Army



4.40. The existing building adjacent to the salvation army consists of a 3 storey residential block that extends far back into the site, with the 1.5 x storeys of restaurant unit with plant at roof level, providing an already existing poor outlook to the 2-3 storey Salvation Army building.

4.41. The proposed building mass, albeit taller than the existing buildings has been designed to offer a central garden space, which offers the Salvation Army a better visual outlook, daylight/sunlight and ventilation to a large portion of the building, which will improve the current situation which looks directly onto a flank brick elevation that is

circa 2.3m away.

1-2 and 35-36 Ethelbert Close



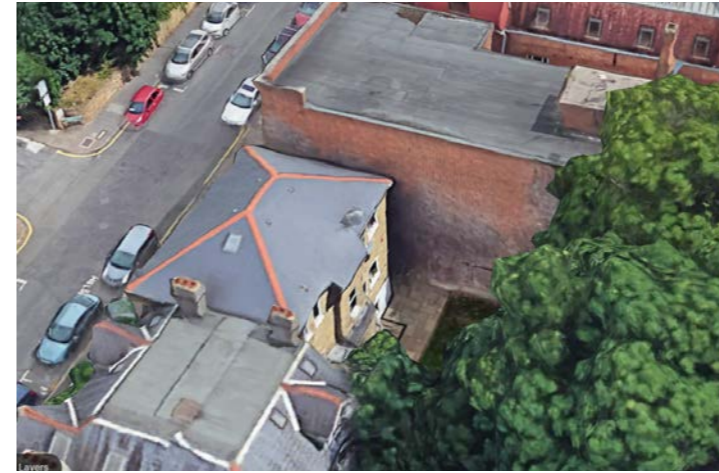
4.42. At the time of designing the appeal scheme, there was a live planning application for the redevelopment of Ethelbert Close (Renamed Churchill Quarter). This submission was a collaboration between Bromley Local Authority and Countryside Properties, and included buildings of up to 16 storeys in height. The application completely stalled due to lack of officer engagement, which resulted in the option agreement expiring.

4.43. Given its importance, the Churchill Quarter scheme was considered as part of the emerging context and therefore appears in the townscape analysis.

4.44. Whilst there are currently no active proposals for the site, this should still be considered as relevant to this application.

4.45. In its existing form, the Ethelbert Close houses are over 18m away from Block A. The massing of which faces opposite to the road between the buildings therefore this would not harm their current living conditions.

7 Ethelbert Court



4.46. 7 Ethelbert Court is a 3 storey Victorian property with residential use that sits to the west of the Ethelbert Road building - the existing buildings on site currently extend past the rear elevation building line giving a large flank brick wall to the rear gardens at the North East. The proposed buildings on site would improve this situation by breaking up the massing with the garden space between the buildings.

4.47. The Ethelbert Road proposals incorporate side angled windows which direct views away from the rear gardens.

Simpsons Place - 6 Ringers Road



4.48. Simpsons place is a 4 storey residential flatted development to the

Ringers Road side of the development. The massing of Block A angles back towards the rear elevation of Simpson's place to avoid impacting the current outlook to the flats, the balconies/windows are also angled to direct the view away from the rear, albeit this is the residents car park and not a communal garden space.

4.49. The side elevation to Simpson's place has one window per floor which is believed to be a non habitable space, and given the emerging masterplan context, any massing or height proposed would impact this.

4.50. The committee report suggests 12.5m - 14m distance from the rear elevation of Block B however the actual minimum is 14.3m, which should be considered an acceptable distance given the Town Centre location, and nearby separation distances of other buildings near the site. This would not harm the current outlook to the rear windows of Simpsons Place and views towards Church House Gardens would be maintained.

William and Henry House



4.51. The buildings are a more current residential development comprising circa 6-10 storey residential units that are

situated over 20m away from the Ringers Road building frontage. 2 x additional stories is a small increment in height would not appear overbearing given the separation distances.

4.52. With regards to overlooking, this is a significant distance and in our opinion would not hinder the quality of accommodation, amenity space or daylight/sunlight as proven in the submitted report.

4.53. The William house development appears to have 2 storeys of accommodation where windows overlook the side elevations of Henry House - the relative distance is circa 5.6m away and they are directly overlooking.



Diagram locating buildings adjacent to site



Site plan showing building and boundary distances



Site plan showing building to building separation distances

5.0 - Conclusion

5.1. The proposal subject to this appeal has been through rigorous pre-app discussions with the LPA, GLA and stakeholders along with an independent pendant design review panel. The resulting proposal is for a compliant, bespoke and deliverable proposal that would deliver significant housing and work space in a sustainable town centre location.

5.2. The reasons for refusal do not consider the notable work undertaken to understand the detail work completed to understand the sites context both in terms of the current situation and potential for a wider emerging masterplan. This scheme is both deliverable now, in the current setting, yet does not preclude development opportunities of the wider block.

5.3. It could also be argued that this development facilitates its neighbours coming forwards through the introduction of the central green space and linking

of Ethelbert Road and Ringers Road.

5.4. Whist the site is constrained, these constraints have been used to inform design decisions and solutions rather than as a limiter to the design or to the compromise of the quality of the accommodation or architecture.

5.5. This proposal has responded to all new and emerging legislation delivering second staircases and an integrated M&E strategy to ensure this building stands the test of time and will only improve with a long lasting brick facade and well lit, high quality internal environments for its residents through the detailed work of the wider consultant team to limit summer solar gains without compromise to outlook.

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

2022 AJ Architectural Award - Leisure (F51) Winner
2022 Dezeen Public Vote - Civic & Cultural Award (F51) Winner
2022 WAF - Completed Buildings: Sport (F51) Shortlisted
2021 Hackney Design Awards Peoples Choice Award Winner (The Fisheries)
2020 RICS South East Awards Commercial Category Winner (Curious Brewery)
2019 FX Awards (Curious Brewery) Shortlisted
2019 Blueprint (Process Gallery) Shortlisted
2019 AJ Architectural Award (Process Gallery) Shortlisted
2019 AJ Architectural Award (Curious Brewery) Shortlisted
2019 Dezeen Award (Process Gallery) Longlisted
2019 AJ Retrofit Award (Gin Works Chapel Down) Shortlisted
2019 RIBA South-East Regional Award (Process Gallery)
2019 BD Awards shortlisted for Small Project of the Year Category
2019 BD Awards shortlisted for Retail & Leisure Architect of the Year
2018 George Clarke Medal Winner (The Cottage)
2018 Property Week Student Accommodation Awards Highly Commended (Palamon Court)
2018 What Awards 'Best Luxury House' Silver Winner (Manor Barn)
2018 The Sunday Times British Home Awards Winner (The Cottage)
2018 AJ Retrofit Awards Finalist (The Cottage)
2018 BD Architect of the Year Award shortlisted for Individual House
2015 RIBA South-East Regional Award (Pobble House)
2014 Kent Design Award (Best Small Project)
2013 WAN World Architecture News Facade of the Year (Crit Building)
2012 Kent Design Awards Overall Winner (Rocksalt Restaurant)
2012 RIBA Downland Award (Rocksalt Restaurant)
2012 RIBA Downland Award (The Marquis)
2012 Restaurant & Bar Design Award Shortlisted
2011 FX International Interior Design Shortlisted
2011 WAN Commercial Shortlisted
2011 RIBA Downland Prize (Commended)
2010 RIBA National Award Shortlisted
2010 Kent Design Awards (Best Education Category)
2010 Building Design & Construction Award (Best Educational Building)
2010 Building Design & Construction Award (Public/ Community Building)
2009 Evening Standard New Homes Award Shortlisted
2008 RIBA Downland Prize (Residential Leisure)
2008 'Britain's Best Home' (Final Six)
2007 Kent Design Award (Best Small Project)
2007 RIBA Downland Prize (Best Conversion)
2007 Kent Design Award (Education Shortlisted)
2006 'What House' Award (Best House)
2005 RIBA National Award
2004 Kent Design Award (Overall Winner)
2004 Kent Design Award (Education Category)
2000 National Built In Quality Award

London

10A Acton Street WC1X 9NG

+44 (0)20 7096 5425

Kent

The Tramway Stables, Rampart Road

Hythe CT21 5BG

+44 (0)1303 260 515

architects@hollawaystudio.co.uk

hollawaystudio.co.uk

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