



21.2.2023

Dear Sir

23/00288/FULL1 | Demolition of existing dwelling and garage and erection of a four storey building comprising 4No. one and 3No. three bedroom flats with underground parking for four vehicles and one external space. Refuse use store, cycle parking to frontage and associated site landscaping. | 8 Madeira Avenue Bromley BR1 4AY

We are a residents' association of approximately 500 subscribing households serving an area in which Madeira Avenue is situated. We concern ourselves with the built environment and with generally improving the area for the benefit of residents.

We **object** to this application.

Application Form

Under the section 'Superseded Consents' it appears that the box 'No' has been ticked incorrectly.

Design and Access Statement ('DAS')

The DAS repeatedly quotes the London Plan 2019 and seeks to demonstrate how this application meets the requirements of the 2019 plan. The applicant does not appear to realise that the London Plan is now in its 2021 version.

Height

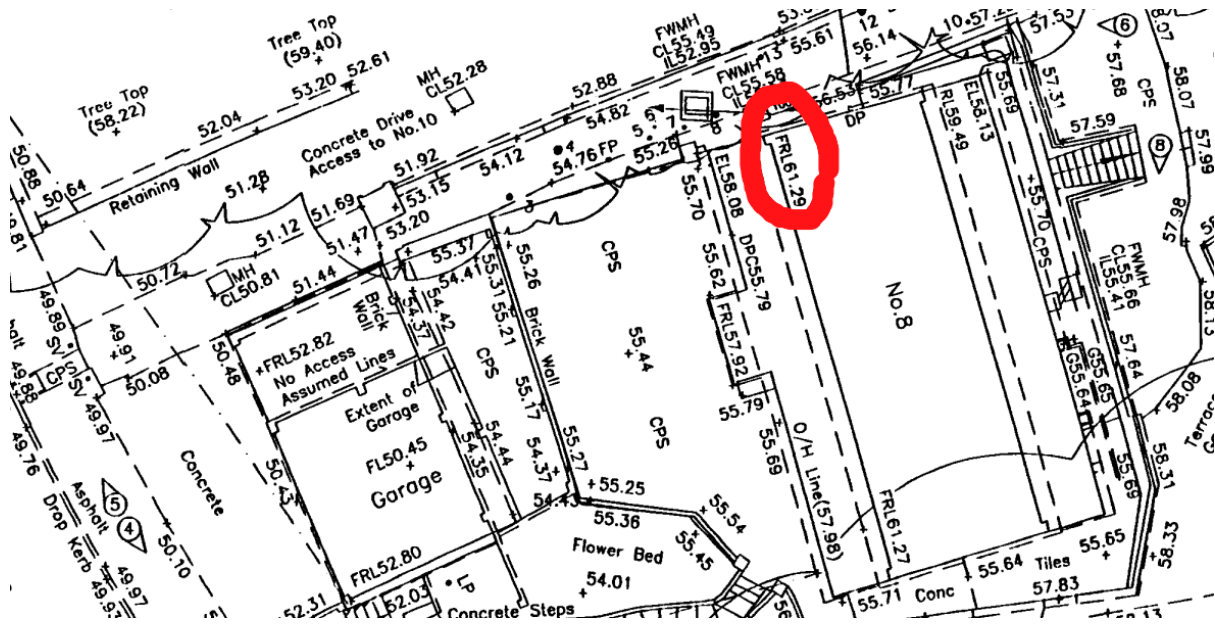
The datum point height of the proposal is 66.49m. Drawing number Y1148/2022/05 Rev 02 refers.

The DAS states:-

The proposed apartments will be 2.25 metres higher than the existing house. The site is sufficiently large to accommodate the new houses and not have any adverse effect on the neighbouring amenity as approved on appeal

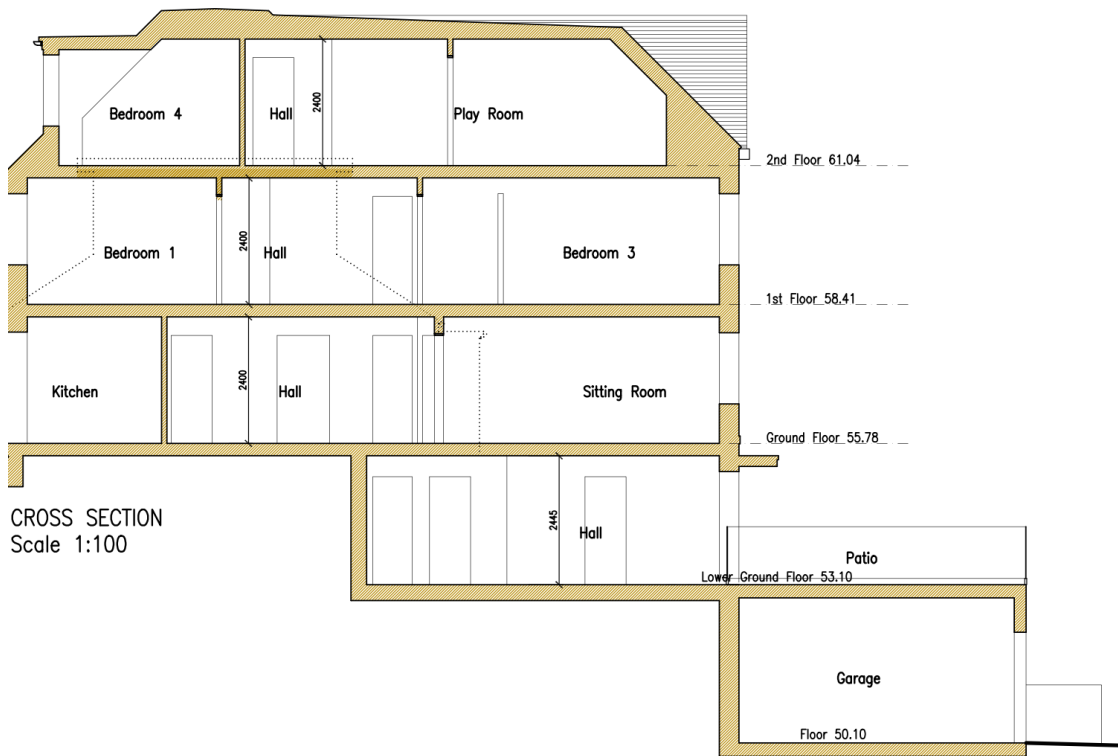
However, this is **wrong** according to the applicant's own information.

Application 10/01006 included survey information (Council document reference number 1094500) which showed the (datum point) height of the existing building to be 61.29m as shown below:-



With regard to 20/04942 (allowed at Appeal) we calculated that the datum point at the top of that proposal was 64.04m as follows. Drawing 2684666 (below) shows the elevation heights for 20/04942 as being 61.04 to second floor level + 2.4 for room height + 0.6 for roof structure making 64.04m in total.

Thus, this new proposal, at 66.49m, is nearly 2.5m more than the existing permission and more than 5m taller than the existing building, according to the datum points provided by the applicant.



1Above: 20/04942



2Above: 23/00288

The proposal is clearly far too high if the stated datum points are accurate.

If they are not accurate, then correct data should be provided to enable a proper analysis.

Occupation and minimum space standards

While the text within various documents accompanying this application states the intended occupation levels, the drawings themselves indicate significantly higher occupation is being planned (see actual bed spaces drawn on various plans).

We show this in the table below. The result is that 5 of the flats would fail to achieve minimum space standards (highlighted in red below):-

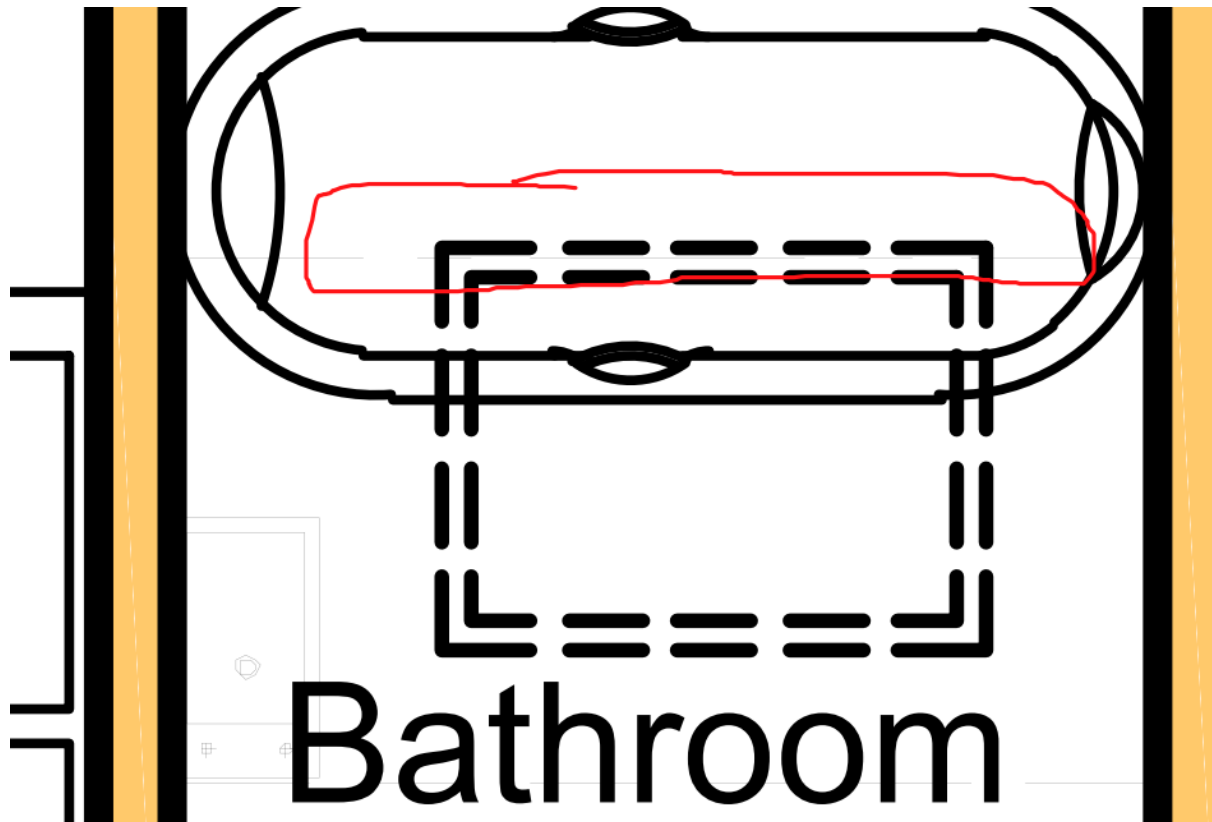
Flat	Stated area (m2)	Type (stated)	Actual, per drawing	Required min. area for per drawings(m2)
Flat 1	52.6	1 Bedroom, 2 Person	1 Bedroom, 2 Person	50
Flat 2	52.6	1 Bedroom, 2 Person	1 Bedroom, 2 Person	50
Flat 3	44.6	1 Bedroom, 1 Person	1 Bedroom, 2 Person	50
Flat 4	74.2	3 Bedroom, 4 Person	3 Bedroom, 5 Person	86
Flat 5	44.6	1 Bedroom, 1 Person	1 Bedroom, 2 Person	50
Flat 6	74.2	3 Bedroom, 4 Person	3 Bedroom, 5 Person	86
Flat 7	88.8	3 Bedroom, 5 Person	3 Bedroom, 6 Person	95

In total 24 bed spaces would be provided, rather than the 19 claimed.

The proposal does not appear to meet Part M requirements to provide accessible housing (unlike the previous application 20/04942)

Accommodation

The standard of proposed accommodation on the top floor is concerning. The slope of the roof and the 1.5m height line significantly intrude on useable space. For example, the bath in flat 7 is all but unusable – how would you actually get in it, if at all less than fully fit and healthy? We have ringed the faint 1.5m line below.



Other basins, toilets, bath and showers are similarly constrained.

Provision of Cycle storage

The DAS claims to be providing 7 cycle storage places at basement and lower ground floor levels. However, the plans only show 4 at lower ground floor level and none at basement level, where there appears to be no room anyway for cycle storage.

This is inadequate because the provision of 4 spaces (or indeed, 7) as shown does not meet the requirements of London Plan Table 10.2:-

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C3-C4	dwellings (all)	<ul style="list-style-type: none"> • 1 space per studio or 1 person 1 bedroom dwelling • 1.5 spaces per 2 person 1 bedroom dwelling • 2 spaces per all other dwellings 	<ul style="list-style-type: none"> • 5 to 40 dwellings: 2 spaces • Thereafter: 1 space per 40 dwellings

On the basis of the room occupancy we state above, $2 \times 1.5 + 5 \times 2 + 2$ visitor spaces = 15 spaces are needed.

Cycle storage is shown at the lower ground floor level, accessible from the street only by a flight of steps which would actively inhibit cycle use and contrary to London Plan Para 10.5.1: -

“Development should facilitate and encourage cycling”

Further, the cycle storage is not covered (i.e. not in a shed).

Bin Store

This is of concern as it is not clear how this will interfere with splay lines.

Further, as this will be very visible, it is of paramount importance that the highest quality of materials should be used.

Car Parking

The DAS makes non-sensical statements which likely relate to another proposal entirely. It states: -

Policy T6.1 of the London plan 2019 sets out the maximum requirement for the provision of car parking, which should be up to 1no. per unit., based on the PTAL rating of 1b. The proposed development provides a garage suitable for parking for 5 cars. There is also space for parking one additional car per house on the forecourt.

This is just all wrong and doesn't relate to the actual plans at all, not least as it talks of houses, not flats.

- The provision of 5 spaces (4 in the garage and 1 externally) does not meet the minimum standard shown in Table 1 Bromley LP Policy 30.

- The space in front of parking spaces in the garage appears to be inadequate to allow easy manoeuvring.
- Proper wheel tracking data should be provided for all spaces.
- There is no provision for disabled person parking.
- There is no indication of the splay lines available upon exiting the car park.
- We are also concerned that the splay lines for the drive of No 10 Madeira Avenue (red arrow below) will be impacted by the refuse store (crudely indicated below).



Lift and lift machinery space

It is not clear how the lift would work – there is no provision at the top of the building to accommodate a lift overrun or machinery. Our concern here is that should permission be given then a subsequent application will be submitted to seek permission for an increase in height to accommodate such an overrun/machinery.

Landscaping

We are concerned that there is no soft landscaping at the front of the building to soften this massive development

Side Space

The roof plan shows that at the front right corner, the building would be closer than 1m to the boundary. This contravenes Policy 8 of the Bromley LP:-

“Policy 8

Side Space

When considering applications for new residential development, including extensions, the Council will normally require the following:

- a) for a proposal of two or more storeys in height, a minimum 1 metre space from the side boundary of the site should be retained for the full height and length of the building;”

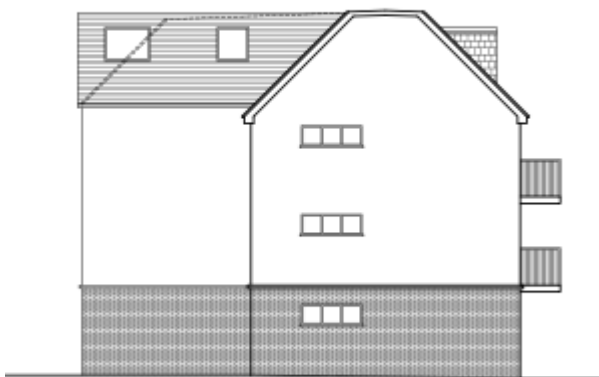
Privacy

We are concerned that no obscure glazing is shown as being provided on the south-east flank facing Kimberley Terrace (whereas obscure glazing is provided on the other flank)

Street Scene

The south-east flank elevation would present a massive elevation to the street scene which will be excessively intrusive and dominant. Were this proposal permitted, it is essential that comprehensive architectural variation and articulation be provided along with a variety of quality materials in order to lessen the impact.

04. Side Elevation



For all these reasons we object to this application