

29th December 2014

Ms. L. Bruce,
Planning Officer,
Bromley Council.

Dear Ms. Bruce,

14/04139/FULL1 | Demolition of existing dwelling and erection of a part two/part three storey building comprising 9 two bedroom apartments and 14 car parking spaces | Sunset Hill Hillbrow Road Bromley BR1 4JL

Ravensbourne Valley Preservation Society is a residents' association of approximately 500 subscribing members which concerns itself with the quality of the built environment in and around Shortlands.

Policy BE 1

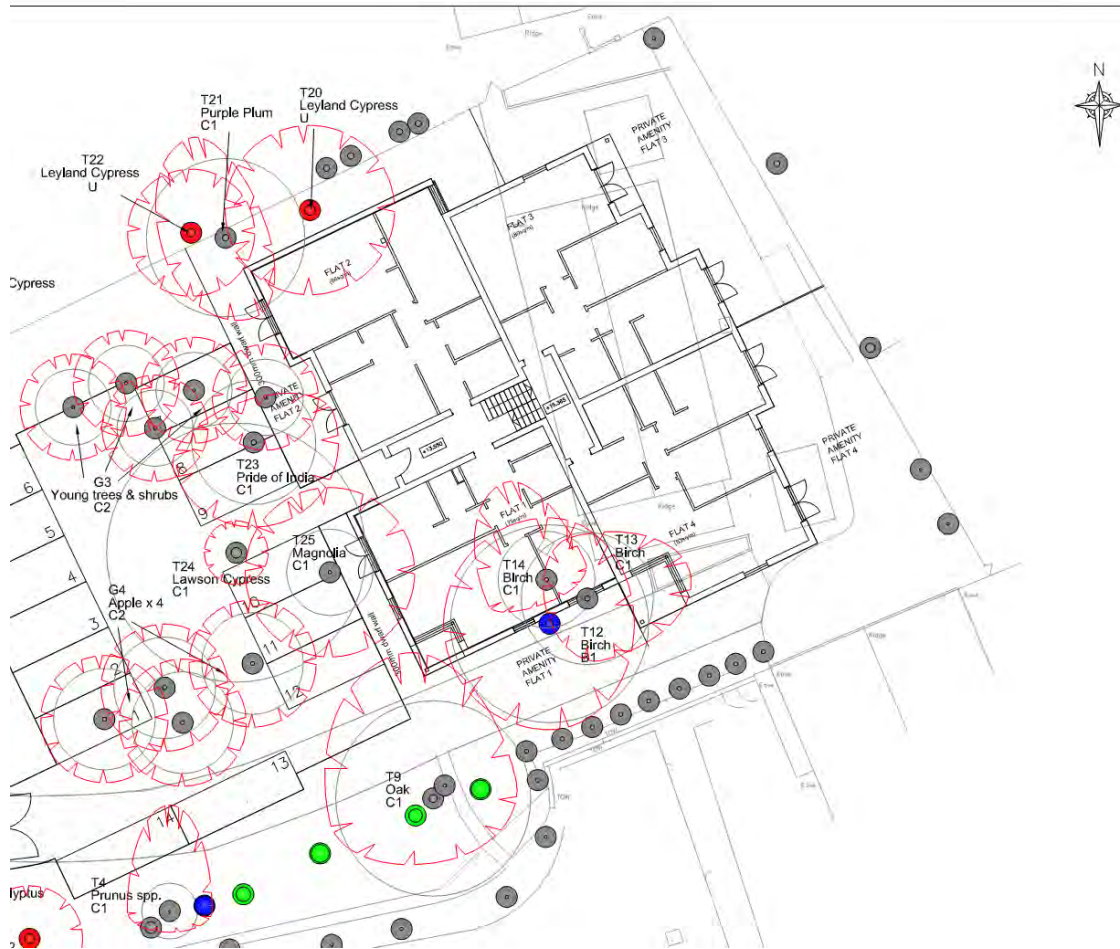
This is a huge and unwarranted development with a design capacity for 36 people or possibly 38 if the study of the penthouse is used as a double bedroom.

Tresco Close, together with the screening provided by the 5 TPO trees on the boundary of Sunset Hill, provides a natural and easy break in the style of the houses in the road. Towards the north east end of the road, the road is characterised for the most part by detached two storey houses. To the south the road is characterised by the unsympathetic development of, probably, the Seventies. The applicant compares the proposal favourably with these Seventies buildings but that does not say very much! One would hope that a proposal would be very much better indeed than these existing buildings but this particular proposal is not so.

Overall, the scale, bulk and massing and general size of the proposal is wholly excessive for the context and its modernistic appearance out of character for its location. A block of flats in the road is also uncharacteristic.

(The applicant refers to the neighbouring property, Upfield, as a three storey property. However, this is clearly not the case. It is a two storey property with a type of undercroft garage)

The footprint of the proposed building would be very much more substantial than the existing footprint and in addition would be far further forward than the existing building line. See the following diagram: -



A large car park in the front garden would also be completely uncharacteristic of this unique area which has a semi-rural feel.

It would also be uncharacteristic to have a large terrace at second floor level.

Amenity space

The amenity space for future residents is extremely limited and inadequate and in the case of flat 6, there is no amenity space at all.

Loss of amenity

The loss of the heavily wooded aspect of the front garden would be a great loss to the street scene.

The provision of so many balconies and Juliet windows together with a second storey terrace will lead to a loss of privacy, a sense of being overlooked and will create an excessive level of noise, particularly in the summer months. In particular a concern is that the second storey terrace is on the front elevation and will create noise to the front of the property. In paragraph 6.8 of the Planning Statement, the applicant recognises that the flank windows should be obscured glazed thus recognising that overlooking is possible from these flank

windows. Therefore, there is clear recognition that overlooking from the terrace and balconies is likely to be a significant issue.

Traffic and transport

Policy T13

This policy states:-

The Council will normally resist:

- (i) development located more than 20 metres from a road with a continuously hard paved surface; and*
- (ii) development that would substantially increase traffic on roads which are not hard paved.*

Hillbrow Road is completely inadequate for a very significant increase in the vehicular traffic that might be expected. Lack of pedestrian walkways increases the risk to pedestrians. Both ends of the road where they meet Coniston Road and Calmont Road are no more than single lane cart tracks:



The road surface itself is extremely poor condition and would be made much worse by construction traffic: -



Figure 1 Typical road surface

Much loose material is already being transported downhill into Calmont Road to the detriment of road users and pedestrians:-



The road outside the entrance of Sunset Hill is particularly restricted by a large shrub.



Policy T18

The lack of pedestrian walkway will result in an increased danger to pedestrians from the increased traffic particularly where the road is narrow at either end.



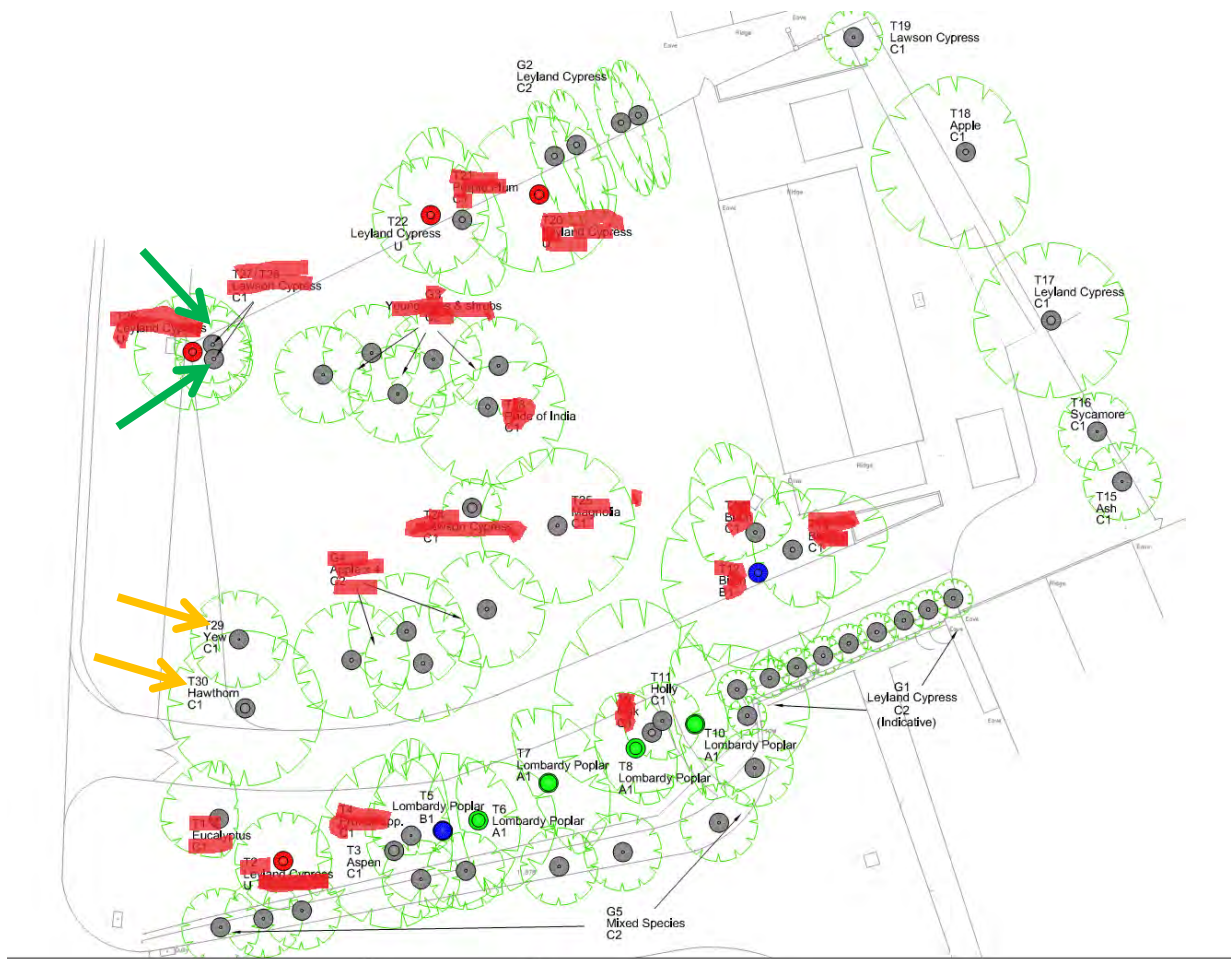
Policy T5

The road surface makes access difficult for those of limited mobility

Hillbrow Road is notable for a lack of on-street parking. We are concerned that with up to 38 residents and only 14 car parking spaces there will be much more on street parking leading to greater risks to pedestrians and a diminution in the attractive street scene.

Trees and landscaping

Tree removal



We are particularly concerned about landscaping. The above diagram shows trees that are to be removed by crossing them out in red. Just two trees, T29 and T30 will exist north of the driveway in the front garden should tree removal proceed as proposed. These we have indicated with an orange arrow. In addition, the whole of the front boundary is densely planted with other shrubs/trees which are not shown above and which would also be removed. Please see below.



Figure 2 The front boundary is completely screened at present but the ringed shrubs/trees are not listed to be felled even though they would be

The result of all this felling will be a lack of large scale screening for this huge and imposing proposal.



Figure 3 View from the North. Most of the trees visible here would be removed resulting in a lack of screening

Specific tree risks

The Arboricultural Report indicates some interesting issues and we should be grateful if the council's tree officer could investigate this thoroughly.

With reference to the section numbers within the Arboricultural Report: -

- Section 8.8: it appears that the tree T3 may also be covered by a TPO and this should be clarified
- Section 9.2.3: the root protection areas of tree T10 and off-site conifer group G2 will be intruded upon by the development. We are concerned that this will harm the trees.

We are also concerned that the canopy of TPO tree T10 will be so close to the proposal as to risk damaging it or requiring it to be cut back significantly.

- Section 9.2.8. Significant pruning of retained trees is envisaged and we are concerned about the impact of this.
- Section 10. Significant tree protection measures are envisaged but we are concerned that these may not be adequate or implemented effectively.
- Section 10.4.6. Details of propose soft or hard landscaping within RPA's are yet to be submitted
- Section 11.2. PLEASE NOTE: the applicant is assuming that all the tree felling may proceed unless the council provides specific comment to the contrary.
- Section 13.3. We are concerned that trenching and excavations may be carried out within RPA's.

Alternative tree felling programme



Consideration should be given to retaining trees T27 and T28 on the north west corner of the plot (far left, above picture). This would enable there to be mature screening at the front of the property. We have indicated these with green arrows on an earlier diagram.

Landscaping scheme

The site plan below shows three large trees in the top left hand (north west) corner which would in fact be removed.



We are concerned that:-

- the applicant has not provided a comprehensive landscaping scheme;
- alternatively if the above is supposed to be indicative of the scheme that is intended there is no screen of shrubs and trees across the entire front of the property; and
- parking is so tight on the front boundary, screening in this location would not survive.
- The grass verge outside the property should be retained and reinstated and that this should be 'conditioned'.



Figure 4 Above: the verge should be retained

Conditions

Without prejudice to the foregoing we would ask that the following conditions, amongst others, be imposed: -

- A04 – landscaping scheme – full application but no details submitted

The landscaping scheme should specify the size and type of trees to be used on the front boundary and ensure that substantial shrubs are grown across the whole width on the front boundary

- B01-B04 to protect all the trees.

Possibly other tree related conditions such as B 13 – excavation by hand and B 18- Arboricultural Method Statement (one has been supplied but it should be reviewed to ensure its adequacy)

- H23 – lighting scheme for access/parking
- H26 – repairs to damaged roads
- I20 - lifetime homes standard and wheelchair access
- K05- slab levels

For the above reasons, we should be grateful if you would refuse permission for this application.

Yours sincerely