



Dear Sir,

**OBJECTION to 21/01982/FULL1 | Demolition of existing building and construction of a part three/four storey block of 9 residential flats with associated parking, amenity space and cycle storage. | 2 Warren Avenue Bromley BR1 4BS**

We are a Residents' Association of approximately 500 subscribing households covering an area in Shortlands which includes the proposal address.

**Application Form**

We would draw your attention the following matters relating to the Application Form itself: -

- Section 7: The application says there would be no loss of garden land when this is clearly incorrect.
- Section 16: The existing number of spaces is incorrectly stated.
- Section 29: Details appear to be incorrect re internet connections.
- Section 30: Some entries have been entered as '1.00' and thus appear to be wrong.

**Historical Context (Local Plan Policy 37j)**

We are concerned that demolition would result in the loss of this prominent, unique, and historically important Victorian landmark house which is part of the original Bromley Park Estate. As such, the proposal wholly fails to respect non-designated heritage assets.

Bromley Park Estate has qualities that deserve recognition and protection. The land was acquired by Lord Farnborough living at Bromley Hill (now Bromley Court Hotel) and upon his death acquired and developed by Samuel Cawston from the 1870s as a Garden Suburb with some of the finest houses in the area, its own church and artisan cottages at Park End. The area, including this property, was recommended for Conservation in 2004.

**Design**

Quite simply, the design is appalling being totally inappropriate, alien and out-of-character for the area. It appears to fail to meet the requirements of LP Policy 4a, d (in that there is no meaningful space for children to play outside), e and f.

In particular: -

- There are no purpose-built flats in the vicinity;
- There are no 4 storey buildings nearby – the vast majority are actually 2 storey;
- The highly visible site would mean that an insensitive design would seriously harm the street scene; and,
- The design is banal and completely out of keeping with, and alien to, the vernacular.

Whilst the developer claims that: -

“The proposed materials will be in keeping with local finishes and detailed to suit the proposed form. (DAS p19)”

the abundant use of glass is not found anywhere in the vicinity.



*12 Warren Avenue is a highly visible and sensitive site*

Given the importance, visibility and sensitivity of the site, a block of flats designed to look like a single house, or a pair of semis, would be much more appropriate than the proposed bland and insensitive design. A good example would be 61 The Avenue (visible from Downs Hill) which is currently being built. Here, several flats have been disguised as two large houses.



*2 61 The Avenue under construction comprising flats disguised as houses*

## Backland and Garden Land Development

The development appears to fail to meet LP policy 3a, b and d.

### Footprint

The footprint of the proposal would be substantially increased with most of the site given over to hard surfaces. There would be minimal garden, if it could be called that.

The building itself would significantly overstep the existing building line to the south and west (Bromley Avenue and Warren Avenue respectively) and at its worst, the balconies would almost be in touching distance of the pavement. The development would be a massive intrusion in the street scene for this reason alone. See below: top left dashed grey square is a balcony very close to the pavement.



The front of the building would be much closer to Bromley Avenue than other houses as each house in the road steps back in turn from the building line to maintain a distance from Bromley Avenue. The same is true for Warren Avenue, in that the existing building line would be overstepped. With 4 storeys so close to the pavement, there would be a profound sense of overbearing, intrusion, and dominance in the street scene.



*3Artist's impression showing how close balconies are to the pavement*

## Neighbour's amenity

With many frequently used rooms looking down, across and into the garden of 38 Bromley Avenue, there would be a significant loss of privacy and sense of over-looking. Furthermore, the rearmost 3 storey projection of the proposal would lead to a sense of domination and oppression for users of the rear garden of 38. In addition, significant loss of sunlight to the garden would result.

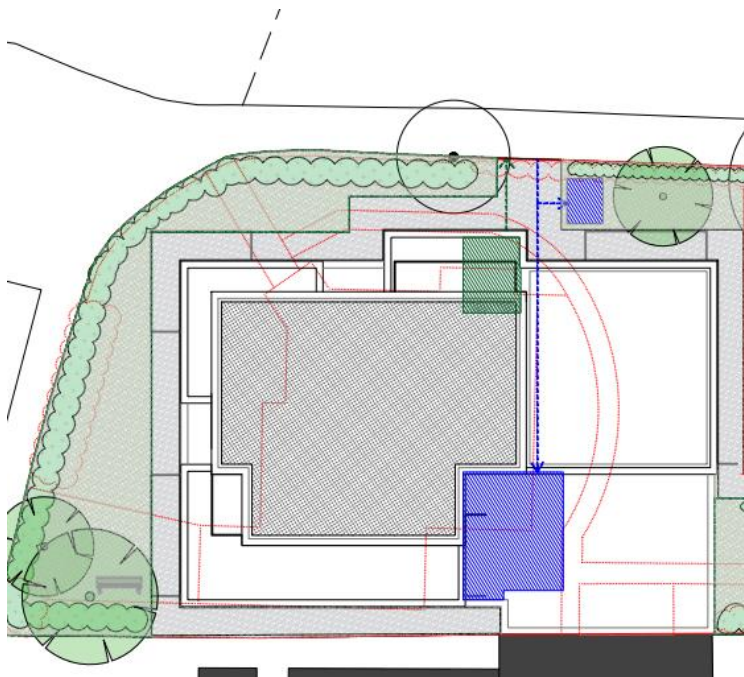
Opposite, at No 35 Bromley Avenue, the amenity of this property would be harmed as the private rear and side gardens would be overlooked by balconies including at 3<sup>rd</sup> floor level.

## Side space

Policy 8 of Bromley's Local Plan requires there to be at least 1m side space between the proposal and the boundary and possibly more in all the circumstances. With an eastern flank rising to 3 storeys, we believe a greater separation than that proposed is necessary between the proposal and 38 Bromley Avenue to avoid the creation of a cramped appearance.

## Landscaping

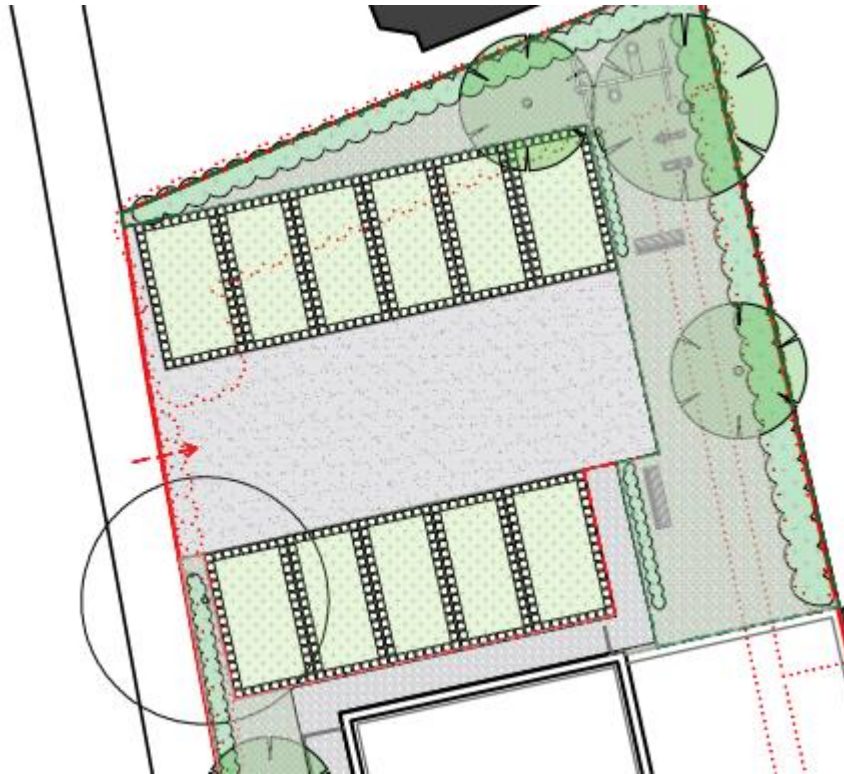
The concern here is that there is simply no space for any meaningful landscaping to break up the massive impact this huge building would have on the street scene. At the current time, no formal details of a landscaping scheme have been provided which might, in itself, say something. Three of the trees that are shown (below) overlap or abut balconies/windows which would result in pressure from proposed occupiers to fell them further reducing screening.



Further, the DAS is misleading as it indicates soft landscaping in the public realm that simply does not exist.

### Landscaping of the car park

A particular concern is that the rear garden would be turned into a large carpark, wholly out of character with Warren Avenue. For fully two thirds of the carpark, no screening is provided at all: -



We are concerned, too, that the bushes conveniently ringed above are likely to be flattened by cars as they park, further reducing any landscaping. This can be seen to be happening at 113 Foxgrove Road. The shrubs should have covered the full width and height shown but were/are continually inhibited in their growth by vehicle damage.



A proposed nearby development, dismissed at Appeal, which would have had prominent parking, was commented upon by an Inspector as follows: -

“This element of the proposal would introduce an extensive area of hard standing to accommodate the parking. The prominent location and the number of formal parking bays proposed would also be at odds with the general character and appearance of the frontage to the residential properties along Oaklands Drive [*sic*]. I share the concerns raised by the Ravensbourne Valley Preservation Society that this arrangement would have a materially harmful effect on the overall street scene.”

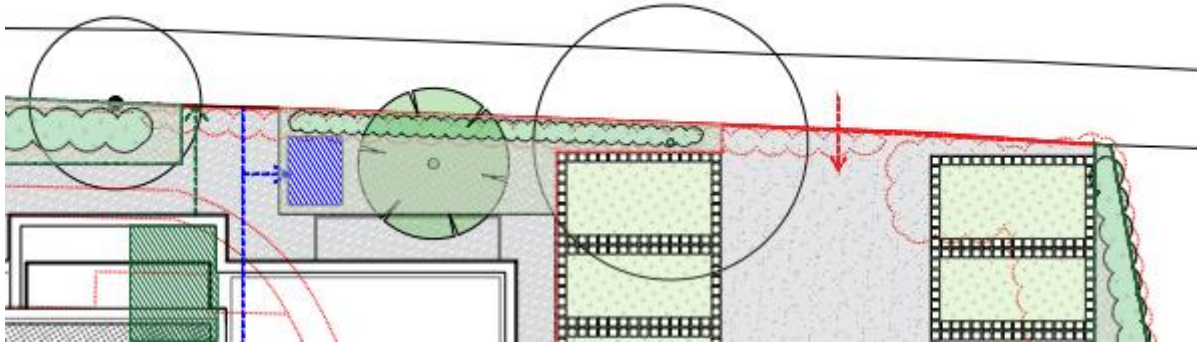
Appeal Ref: APP/G5180/W/14/3000441 Oakdene, Oaklands Road, Bromley BR1 3SL. DC/14/01844/FULL1

## **Height**

The height of the proposal would be nominally the same as the existing turret. However, this height would be extended for most of the width and depth of the building, rather than just the turret. The height, and the fact that the building would provide 4 storeys of accommodation, is wholly uncharacteristic in the surrounding area and would lead to a profound sense of dominance and overbearing for this very sensitive and highly visible location.

Further, we are concerned that the roof height may be further raised by the installation of a lift over-run which is not shown in the plans. The lift is shown servicing the top floor which suggests machinery must go above this. Similarly, we are concerned about the prospect of roof safety railings as these, along with the over-run, would be highly visible and intrusive in the street scene.

## Cycle storage



This diagram shows external storage space for cycles (blue square). No details about this are provided and the concern is that a covered bike shed right next to Warren Avenue pavement would be unsightly, incongruous and out-of-character to the area.

## Environmental matters

It is very disappointing that so little attention has been paid to environmental issues.

There is/are:-

- No heat pumps or solar energy to provide 'zero-carbon' accommodation
- No electric vehicle charging points

## Transport

We are concerned that modelling for the swept path analysis has not used a large car as these can be reasonably expected.

Your sincerely

Clive Lees

Chairman

Ravensbourne Valley Residents

c/o 38 Warren Avenue, BR1 4BS

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