



Historic England

Ms Jessica Lai
London Borough of Bromley
Planning Department
Civic Centre, Stockwell Close
Bromley
London
BR1 3UH

Direct Dial: 020 7973 3287

Our ref: P01129351

20 January 2021

Dear Ms Lai

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**70 HIGH STREET BROMLEY BR1 1EG
Application No. 19/04588/FULL1**

Thank you for your letter of 14 November 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The amended proposals are for the façade-retention of the existing buildings at 66-70 High Street and the erection of a mixed-use development involving a 12 storey tower. Due to the site's close proximity on the boundary of the Bromley Town Centre Conservation Area, the proposed development would, in our view, cause a degree of harm to the Conservation Area's significance through development within its immediate setting as a result of its overly-dominant presence on the southern section of the High Street and visual competition with the modest market town character of the Conservation Area. This letter should be read in accordance with our previous letter of 9 December 2019 on the original scheme.

Historic England Advice

Significance

The application site is located on the south west corner of the junction of the High Street and Ethelbert Road, immediately to the south of the Bromley Town Centre Conservation Area. The existing brick buildings on the site date from the 1930s and are a good quality example of a contextual High Street commercial terrace. Visual interest is created through the overall composition of the terrace, with no.68 slightly recessed, and through the use of detailing and ornament, such as the Classical-style stone dressings to the windows of no.66 and 70. These buildings are identified within



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the Council's Site 10 Masterplan (see below) as being of 'heritage and townscape value'. In our view, these buildings constitute a non-designated heritage asset and positively contribute towards the setting of the Bromley Town Centre Conservation Area.

The Bromley Town Centre Conservation Area forms the historic heart of Bromley, containing a wide range of historic buildings dating from the 17th century to the present day. It was first designated in 1985, originally focussed around the historic core of Market Square and the north part of the High Street, with subsequent extensions enlarging the boundary. Although much of the wider town centre has been subject to large-scale redevelopment, the conservation area is relatively well-preserved and retains a strong historic fine grain layout and market town character with predominant building heights of 2-5 storeys. The High Street forms part of the central spine of the Conservation Area along the historic route from London to Sevenoaks. The Churchill Theatre and Library was constructed in 1977 and is a landmark building within the conservation area reflecting its civic function.

Impact

Full planning permission is sought for the façade-retention of the existing buildings at 66-70 High Street and the erection of a mixed-use development involving a 12 storey tower. The proposed building would impact on the setting of the Bromley Town Centre Conservation Area as a result of its height, scale and massing, which would contrast with the established character and predominant scale of buildings within the conservation area.

This impact has been assessed as part of the Revised Heritage, Townscape & Visual Impact Assessment (Iceni, Nov 2020). View 16 (Outside Churchill Theatre) demonstrates that the proposed building would dominate in views along the High Street, creating a contrast to the predominantly low-rise buildings within the Conservation Area boundary. We recognise that the Regent's Place and St Mark's Square developments, both located some distance to the south of the application site already present a moderate visual impact in this view. However, due to its closer proximity, the proposed 12 storey tower would increase this impact.

Policy

National Planning Policy is set out in the Government's National Planning Policy Framework 2019 (NPPF). Fundamental to the NPPF is a presumption in favour of sustainable development. To achieve this, paragraph 8 of the NPPF states that the overarching economic, social and environmental objectives should be sought in mutually supportive ways to, amongst other things, contribute to protecting and enhancing our natural, built and historic environment.

Section 16 of the NPPF relates to the conservation and enhancement of the historic environment, and includes the following paragraphs of direct relevance to this case:



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- Paragraph 192, which states that 'local planning authorities should take account of: the desirability of new development making a positive contribution to local character and distinctiveness.'
- Paragraph 193, which states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'
- Paragraph 194, which states that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'
- Paragraph 196, which states that that 'less than substantial harm' to the significance of a designated heritage assets should be weighed against the public benefits of the proposal
- Paragraph 197, which states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application' and that 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

The application site is located within the Bromley Town Centre Area Action Plan (AAP, adopted October 2010), within Site G (west of the High Street). The AAP sets out the Council's vision for the town centre together with objectives, policies and proposals to guide future development. AAP Policy BTC17 states that new development will be required to 'protect and enhance the character of the Conservation Area; respect local context, history, built heritage and character; [and] protect and enhance the historic environment and heritage character of town centre.'

AAP Policy BTC19 requires proposals for taller buildings to 'take account of key views and vistas and impact on the character of town centre and Conservation Area'. It is important to note that the application site is **not** identified within the possible locations for taller buildings shown on the Key Diagram on p.29.

We are not aware of any relevant site allocations within the Bromley Local Plan that support the principle of a tall building in this location. We note that the site is located within the Opportunity Site G / 10 Masterplan (2018). Historic England raised concerns in our response to a public consultation on a draft of this document in July 2018, and are unsure of its current status and whether it has formally adopted by your Authority. Nonetheless, the existing buildings on the site are singled out (with nos.54-62 High Street) as being of 'heritage and townscape value' and are **not** identified as a potential redevelopment site. The (draft) Masterplan states that redevelopment proposals 'will need to ensure that new buildings respond to the surrounding heritage and adopt a sensitive approach to the Conservation Area, preserving and enhancing the character



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and interest of the area.’

Position

On the basis of the submitted information, Historic England is of the view that the proposed development would cause harm to the significance of the Bromley Town Centre Conservation Area through development within its setting. The over-dominant scale and massing of the proposed building would visually compete with the modest market town character of the Bromley Town Centre Conservation Area.

Furthermore, we do not consider the current proposals to conform to the existing and emerging plan-led approach for tall buildings within the Bromley Town Centre. Please note that Historic England (and previously as English Heritage) have raised concerns in formal consultations to both the AAP and the Site 10 Masterplan regarding the potential for tall buildings in Bromley Central to adversely impact on the setting of the Bromley Town Centre Conservation Area.

We consider the degree of harm caused to the significance of the Bromley Town Centre Conservation Area to be towards the lower end of less than substantial. We recognise that the amendments made to the proposals, in reducing the height of the new building and in retaining the existing facades, have reduced the impact on the historic environment. Nonetheless, in determining this application, your Authority should give great weight to the conservation of the conservation area (as a designated heritage asset) ‘irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’ (NPPF Paragraph 193). Your Authority should also consider whether the harm we have identified has been clearly and convincingly justified in accordance with NPPF Paragraph 194, and appropriately balanced by the delivery of public benefits in accordance with NPPF Paragraph 196.

Recommendation

We urge your Authority to address the above advice, and determine the application in accordance with local and national planning policy, and in consultation with your Council’s specialist Conservation Officer. Please contact me if we can be of further assistance. We would be grateful to receive a copy of the decision notice in due course. This will help us to monitor actions related to changes to historic places.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service’s published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.



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The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Chris Costelloe

Inspector of Historic Buildings and Areas

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cc



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