



**DRAFT**

Dear Sir,

**OBJECTION to 21/05127/FULL1 | Demolition of existing building and construction of a part two/three storey block with additional roof space accommodation comprising 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 17: The application states no EV charging points would be provided which is clearly inappropriate.
- Section 18: This is clearly incorrect as there are trees and shrubs on site. **A tree survey may thus required but has not been submitted (as of 22.11.21)**
- 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. Further, there is no PV or heat pump provision which is clearly inappropriate given the climate emergency. We note that while it is stated that 9 flats will have electric heating, 8 new gas connections will be provided which is hard to reconcile.

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

This property has previously been determined to be a non-designated heritage asset. We are concerned that demolition of this fine property would result in the loss of a prominent, unique, and historically important Victorian landmark house which is part of the original Bromley Park Estate. As such, the proposal fails to conserve 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 1870's 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

While the revised design goes some way to replicate the appearance of the existing building the proposal remains unsatisfactory.

Serving up to 38 people, this is an over-intensive, uncharacteristic and cramped over-development.

In particular: -

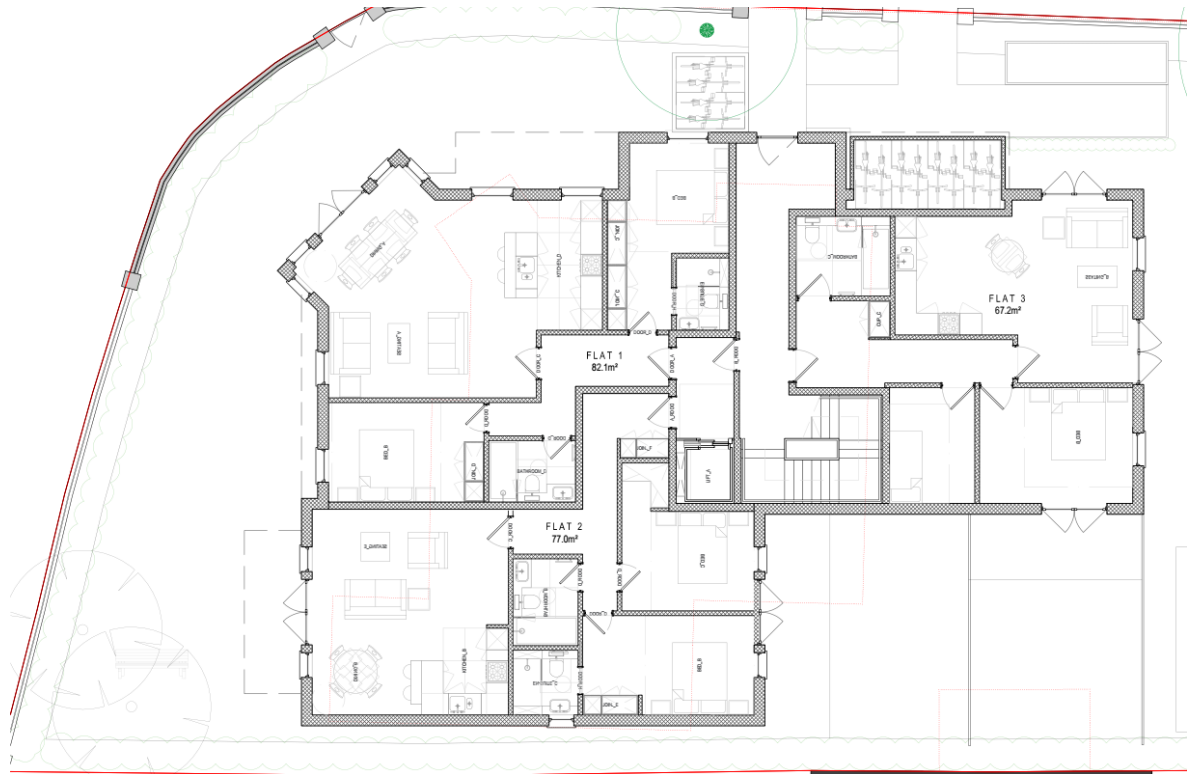
- There are no purpose-built flats in the vicinity;
- Although the 4<sup>th</sup> storey is mitigated by being partially disguised as a roof, there are plenty of features (balconies and full height doors) to make it clear that this is a four storey building which would be wholly uncharacteristic of nearby 2 storey buildings;
- Balconies and full height doors (on upper stories) on the front elevations would be wholly uncharacteristic in the area.
- The bulk and mass would be highly imposing, intrusive and dominant in the street scene, especially as existing building lines would be significantly overstepped.
- There would be minimal exterior amenity space, especially for children.
- The closeness of the proposal to the highway would be quite uncharacteristic of properties in the area, a situation made worse by the prominent site and the sheer mass and bulk of the building.



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

## 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.



2 The footprint of the existing building is hard to see above, but is clear in the original

The front of the building would be much closer to Bromley Avenue than other houses in Bromley Avenue as each house in that 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, with little or no opportunity to mitigate the impact with soft landscaping.

### **Neighbour's amenity**

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**

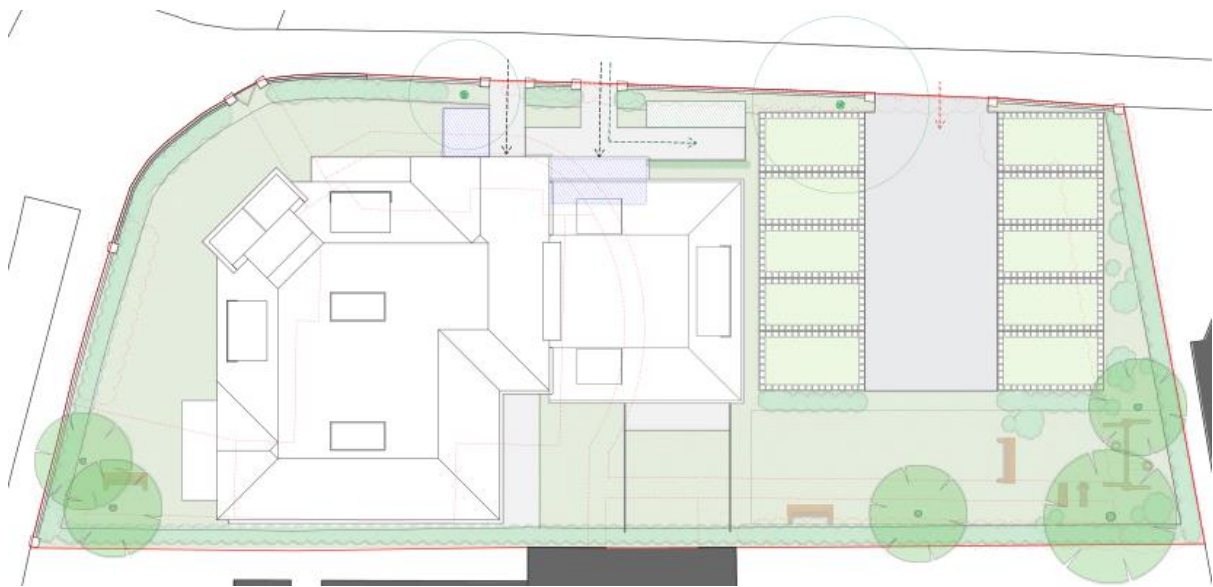
Policy 8 of Bromley's Local Plan requires there to be at least 1m side space between the proposal and the boundary and possibly more in all the circumstances. With an eastern flank

rising to 3 + 1 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. We are particularly concerned that the two trees on the Warren Avenue boundary and the bushes on the north boundary, vital for screening, would not survive, given the proposed layout of the site.

A particular concern is that the rear garden would be turned into a large carpark, wholly out of character with Warren Avenue. There is no space for meaningful screening by way of shrubs: -



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

## **Artist's impression**

We are concerned about how this impression conveys the actual height of the proposal. It appears to under-represent the proposed height very significantly and as such is quite misleading. It also fails to show the impact of the bin store.

## **Height**

The height of the proposal would be even greater than the recently refused 21/01982 and greater than the height of the existing turret (which element only forms a small part of the existing roofscape) . Further, 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.

The building height is proposed to be 12m, (application form Section 7) but measurement suggests it would be slightly more, together with a further 1.5m for the chimney pots.

We note that this design includes several very tall chimneys which would further add overall height and increase the impact in the streetscene.

## **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

## **Waste**

We are disappointed no description is provided of the waste store. This is likely to be a very large, unsightly, and uncharacteristic intrusion in Warren Avenue

## **Transport**

We are concerned that modelling for the swept path analysis has not used a large car as these can be reasonably expected. The car park appears tight and we are concerned that this will impact on the availability of soft landscape screening

## **Conditions**

Without prejudice, we would suggest the following conditions: -

- Decorative ridge tiles
- In some cases, more attractive window arches
- Significant landscaping to break up the bulk and mass of the proposal in the street scene

- A more attractive east flank which is particularly bland and uninspiring
- It is suggested that the brick details underneath the sills are not painted white but are left in the natural brick colour in order to break up the large expanse of white paint.
- Sprocketed eaves

Your sincerely