Bromley Civic Society

c/o 8 Pixfield Court, Beckenham Lane, Bromley, BR2 0DG Tel: 020 8464 3181 Email: tone@banfi.fsnet.co.uk

18th September 2013

The Chief Planner Bromley Civic Centre

Dear Sir,

13/02451/OUT 1 Westmoreland Road Bromley BR2 0TB

Demolition of existing building and erection of a part 3/part 11
storey building comprising 1518 sqm Class B1 officeProposalfloorspace and 71 residential units (25x1 bed; 30x2 bed; 16x3
bed flats), 47 car parking spaces and associated landscaping,
servicing and cycle parking OUTLINE

Our Committee has asked me to make the following comments.

As per our previous comments to the refused application there is no objection in principle to the site being developed and the current proposals are an improvement in terms of building materials.

However we continue to object to heights, impact on the protected views of Keston Ridge, adjacent listed and locally listed buildings and the amenity of adjacent residents.

View of Keston Ridge

The developer says in para 8.19 of the amended planning statement

"It is noted that the previous planning application was refused on the basis of the perceived impact of the podium element on views to Keston Ridge. In response to this, the height of the podium element has been reduced by approximately 1 metre, and it is now merely 1 metre taller than the main element of the existing building. In terms of impact of views of Keston Ridge, the enclosed plans and Design and Access Statement confirms that the revised proposal will not obscure views to Keston Ridge. At present, opportunities to see Keston Ridge are limited in shorter views and the impact of the proposal will not change this significantly. In longer views, views of the ridge will be maintained from all locations in the High Street.

And para 8.20

" Aside from the height of the podium element, the building envelope is identical to the previous proposal in scale and mass and the scheme should therefore be supported by the Council in these terms ".

The actual reason for refusal was "The indicative proposal, by reason of its scale and height, would detrimentally impact on protected long distance views of the Keston Ridge contrary to Policies BTC 19 and OSL of the Bromley Town Centre Area Action Plan and Policies BE 17 and 18 of the Bromley Unitary Development Plan."

The refusal makes no specific reference to the <u>podium</u> which is all that the developer has addressed as distinct from the <u>tower block</u>. It is both these elements that detrimentally impact on the protected view.

The developer has provided no visual evidence of any improvement and simply reproduced the indicative photo from the refused application (right). This clearly shows the view as seen from the <u>top of a bus</u> rather than street level which is where the view is actually seen from the public domain. The tower continues to on the view to the right and the podium even with a one metre reduction still 1 metre above the existing building and too close to the



ridge to allow the view to have meaning or significance once constructed.

The developer is caught in the middle of the two contradictory statements in the AAP- on the one hand that a taller building only <u>MAY</u> be possible but, on the other hand, that there should be no detrimental impact on the protected view. Bearing in mind that the statement regarding the view is unequivocal but that regarding the taller building is conditional the preservation of the view should take precedence.

Given, also, that the hotel element has been eliminated we suggest that the building content be reduced accordingly and the tower element be abandoned.

Impact on adjacent listed and locally listed buildings

The revised building materials is an improvement however the height and semi ziggurat form of the tower block is still an incompatible element in the setting of the adjacent listed and locally listed buildings contrary to UDP policies BE 8 and BE 10.

Impact on residential amenity

The previous Council objection was "The proposal would detrimentally impact upon the amenities of the occupiers of nearby residential properties by reason of the scale and layout of the proposed building in this application, resulting in a sense of enclosure for these residents, contrary to Policy BE1 of the Unitary Development Plan. "

We can see no appreciable difference in the amended proposal to alter this objection.

Conclusion

We request the application be refused on the same grounds as the previous . If the developer wishes to pursue the project they be instructed to produce accurate and demonstrable illustrations of the environmental and social impacts.

Yours faithfully on behalf of Bromley Civic Society

Tony Banfield

Chairman