

# Design Review

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## 66-70 High Street, Bromley

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for London Borough of Bromley

May 2020



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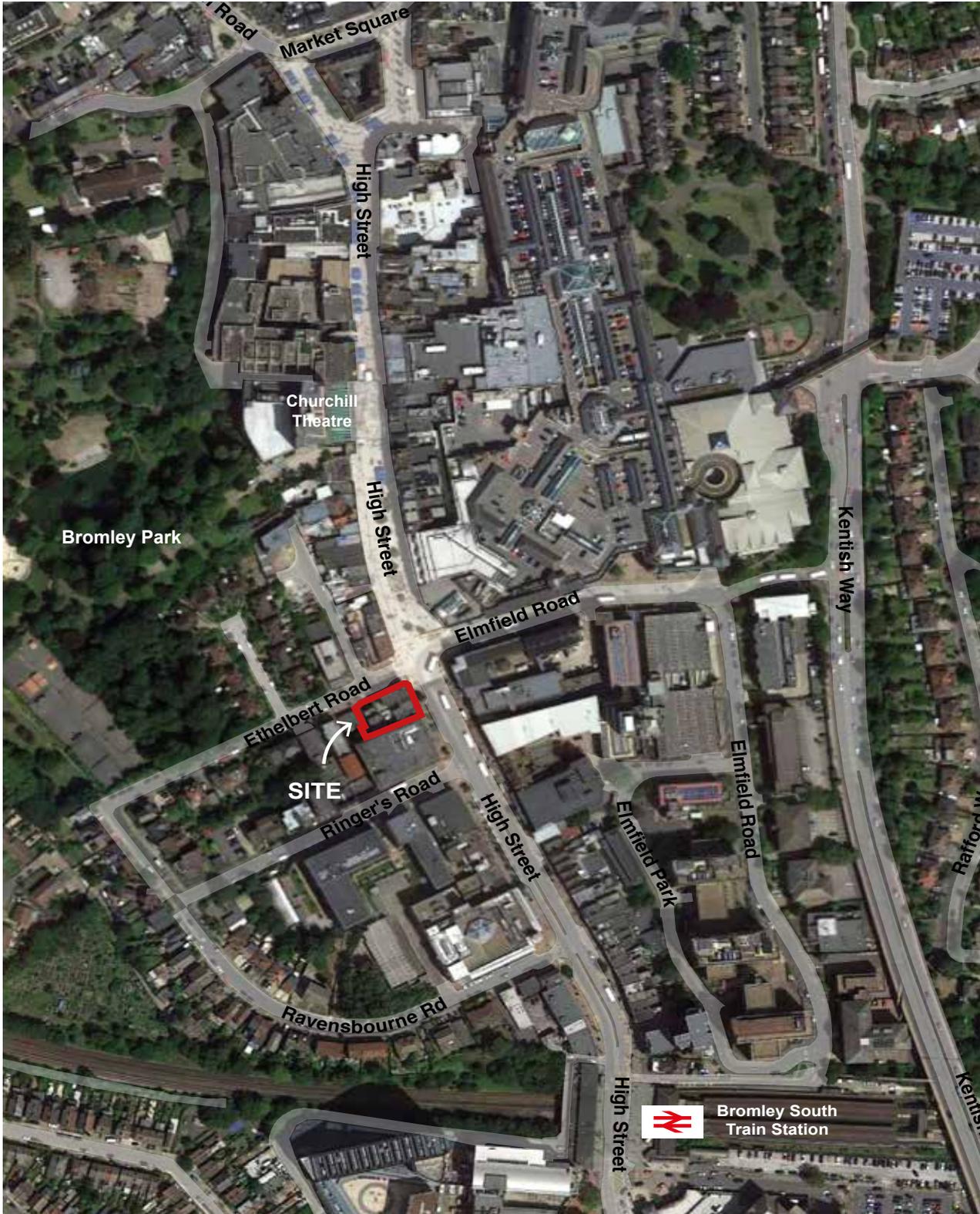
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Proposal Site in local context - aerial from Google Earth

# 1

## Site Context and Existing Buildings

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### 1.1 Introduction

1.1.1 This document is a design review of the proposed development at 66-70 High St, Bromley, designed by Assael Architects for S2 Estates. The site is located in the town centre of Bromley on the corner of Ethelbert Rd and the High St.

1.1.2 The proposal is for demolition of the existing buildings (66-70 High St), construction of a 16 storey mixed-use building to provide 582sqm retail floorspace (use class A1) and 68 residential units with associated disabled car parking spaces, cycle parking and refuse storage area.

1.1.3 The site is within Bromley Town Centre and the Bromley Town Centre Opportunity Area. It was also identified as part of Opportunity Site G/10 in the Draft Bromley Masterplan (unadopted) and is adjacent to the Bromley Town Centre Conservation Area. It is not identified as an appropriate location for a tall building in the Bromley Development Plan

1.1.4 This report reviews the design approach taken for this site, the townscape value of the existing buildings (proposed for demolition) and the design and townscape impacts of the proposed building. As a tall building the proposal has impacts on its immediate environment as well as beyond this, affecting the street scene, the wider townscape, skyline and character of Bromley Town Centre and the wider local area. These issues are considered in this report.

1.1.5 This report has been carried out by Amanda Reynolds, Director of AR Urbanism (ARU), architect and urban designer.

1.1.6 Drawings included in this document are a mixture of original (by ARU) and from the Architect's Design and Access Statement (DAS), the Heritage, Townscape and Visual Impacts Assessment (HTVIA), and drawings as submitted for the planning application. Drawings and images are identified as to their origins.

### 1.2 Townscape Analysis - Bromley Town Centre

1.2.1 Bromley town centre is built on a partly sloping promontory with the oldest part of it, the old 'village centre' on an elevated plateau to the north, with the High St running south away from this area. The High St follows a sloping ridge down to the Bromley South Railway Station, which forms a lower nodal point in the overall town centre as well as identifying the entry to the slightly separated area of Bromley South, which sits on lower topography.

1.2.2 The High St has developed throughout the late 19th and 20th centuries from a minor village street into a busy retail centre and the town centre has grown around it on the upper plateau and the eastern and western slopes of the hillside. The western side is steeper, with side streets - including Ethelbert Rd - falling away quickly to the lower residential levels. This side also includes Bromley Park and Church House Gardens, large local green spaces.

1.2.3 The older shops lining the High St are generally traditional 3 storey (with some 2 and 4 storeys) terraces with retail at ground floor and, originally at least, residential uses above. These tend to be located in groups, with some newer, larger buildings also scattered along the length of the street. These newer buildings also largely conform to the use structure of retail at ground floor and other (residential/office) uses above. Some of the more recent buildings to the north of the Churchill Theatre are more than 4 storeys, but almost the entirety of the High St follows the pattern of 3/4 storeys fronting the street with retail/active frontage at the ground floor.



Heights Plan of Bromley Town Centre Built Form

KEY	<span style="color: #d9ead3;">●</span> 1-1.5 Storey	<span style="color: #f4cccc;">●</span> 4 Storey	<span style="color: #e41a1c;">●</span> 7-9 Storey	<span style="color: #54278f;">●</span> 16+ Storey
	<span style="color: #c4e62a;">●</span> 2-2.5 Storey	<span style="color: #f4a460;">●</span> 5 Storey	<span style="color: #d62728;">●</span> 10-12 Storey	
	<span style="color: #f4c400;">●</span> 3 Storey	<span style="color: #e377c2;">●</span> 6 Storey	<span style="color: #2ca02c;">●</span> 13-15 Storey	

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1.2.4 The architect's DAS states at p.17 that "*general best practice principles of urban design for densifying High Street whereby taller elements are located on the street itself and not along secondary routes*" as a justification for redeveloping this "underutilised site" (also p.17). I disagree that this is a 'best practice principle' and no source is provided for this statement. There are many flourishing examples of relatively low-rise high streets - Oxford St in central London for example - and while density is definitely sought for both high streets and town centres, tall buildings are not the only way to provide good density.

1.2.5 In addition to this, locating residential uses directly on the busiest streets of a town centre - with attendant vehicle noise and late night economy noise - is certainly not best practice as residential uses are generally most happily located on secondary side streets, as they currently are in Bromley town centre.

1.2.6 There are existing tall buildings (8/10 storeys and higher) in the town centre High St area north of the station. Several are from the 1960/70s and are located an approximate block back from the High St, mostly on the eastern side. On the west of the High St, the listed Churchill Theatre is a significant height, the tallest element on the plateau of the town centre, and while its building footprint stretches to the street, its main height is setback, maintaining a consistent rhythm along the street edge, if not exactly lining up with its neighbours.

1.2.7 This consistent pattern of a lower, but well-structured urban edge to the High St, with taller elements beyond, is also followed in more recent 21st Century developments. The recent development on Ringers Rd for example, is a tall block set behind the existing High St shops, then lower elements stepping down the hillside to meet the existing housing and reinforcing this signature pattern of Bromley Town Centre's land form.

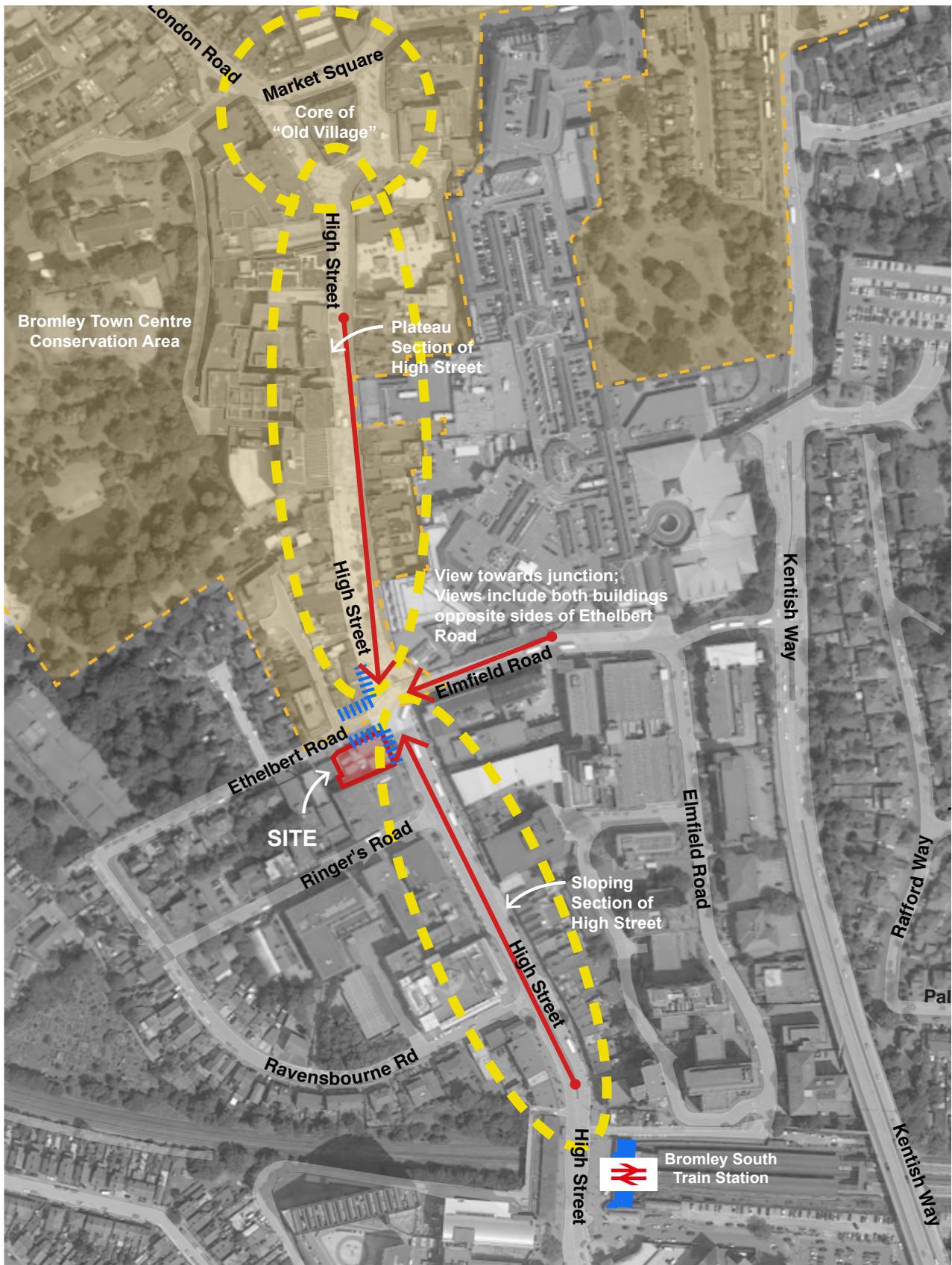
1.2.8 A more recent alteration/extension of an existing building on the eastern side of the street immediately north of the railway station, also follows the pattern of lower development to the front of the site (4 storeys to the street) with a tall building to the rear, behind the front building. It also sits to the rear of the line of 3 storey retail buildings which create its foreground when looking from the north.

1.2.9 The minor streets behind the High St, before meeting suburban housing, generally include larger plots, which are more readily developable for modern needs than the smaller plots and traditional footprint buildings which front the High St.

1.2.10 A newer, large scale development (Churchill Gardens) proposed on Zone 1 of the 'G/10' development site (as per the Council's AAP) is currently being considered by the Council and is to be located on the north side of Ethelbert Rd, stretching up toward the Churchill Theatre, where it will create a new public realm setting for the Theatre and entry into the adjacent park as well as additional housing and other uses.

1.2.11 The maximum building heights for this development are understood to be 13/14 storeys and the whole development is set behind the High St shops which are in the Conservation Area. While this pattern of taller buildings set back from the High St may not have been a conscious design approach from the beginning, it has set a clearly identifiable and significant urban structure pattern for the town centre that is being consistently reinforced by contemporary developments and this emerging scheme also follows the pattern.

1.2.12 The DAS quotes from the Vision Statement of the Masterplan (unadopted) produced by Stitch Architects for the Churchill Gardens application, which refers to this urban form. The last bullet states: "*Ensure the form and massing of the buildings is set back from the High St and sensitive to the 'ridge' profile of the Town Centre topography.*"



Sketch Analysis of town centre form relating to the site

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1.2.13 This form offers a number of urban design attributes which are positive contributions to the specific identity, quality and form of Bromley Town Centre, are of important townscape value, and should be carried through with new projects:

- Reinforcing a sense of townscape continuity which expresses a historical narrative about the ongoing identity of Bromley Town Centre and the wider area;
- Reinforcing a streetscape pattern that does not create disjunctive breaks in the character of the important identity street;
- Allowing for and continuing good daylight and sunlight penetration into the High St;
- Reinforcing the residential character of the town centre side streets by focusing large residential components on these side streets.

### 1.3 The Local Site Context

1.3.1 The site is located at the approximate centre of the High Street's length between the railway station to the south (Bromley South Station) and the old town to the north - where the High St meets East St. The site sits on the south-west corner of the High St junction with Ethelbert and Elmfield Roads, which is also the point where the High St flattens out and becomes pedestrianised to the north, where it accommodates a street market and generous areas of public realm.

1.3.2 The junction has some importance for a number of reasons: it marks the change in topography and character of the High St between the relatively level section, the 'plateau', to the north which is now pedestrianised, and the section to the south which slopes directly down to the railway station. There is also a subtle direction change at this point with the northern section curving slowly to the east while the southern section is straight until it almost meets the station.

1.3.3 In addition, the street opposite the site, Elmfield Rd, which forms part of the junction, is the arrival point from busy Kentish Way and carries many of the bus routes as well as other vehicles.

1.3.4 This prominent location, together with the upper and lower curves of the High St, make views toward both the buildings on the Ethelred Rd corners clear from both ends of the High St. Both buildings are also visible from along the north side of Elmfield Rd, meaning that both these corner buildings are read together in many local street scene views (as also shown in the historical photographs from the HTVIA (reproduced on p.14, this report).

1.3.5 The town centre of Bromley is expected to undergo a considerable amount of redevelopment over the next few years and this site is part of a larger area on the west of Bromley High St which is identified as having a large development capacity. It is part of Site G/10 of the Area Action Plan, now in the local plan. The proposal currently being considered by the Council (Churchill Gardens) for the site from Ethelbert Rd to the Churchill Theatre is set behind the existing shops (within the Conservation area), on the High St.

1.3.6 This scheme will demolish the Town Church on Ethelbert Rd, another 1930s structure and replace this with a new church as part of a larger development which also includes much new housing and a new central public space adjacent to the Churchill Theatre. This development will have a landscaped pedestrian entrance accessed from Ethelbert Rd, thus increasing the likely use and importance of this street as a pedestrian entry point for new and other local residents and visitors.



View towards the top of Ethelred Rd with the subject site and buildings on the left and the conservation area buildings on the right - both constructed early 30s and presenting similar scale, form and materials - from Streetview



View up the High St from beside the subject buildings at the junction with Elmfield/Ethelbert Rds. The view looks towards the Conservation Area and includes the Churchill Theatre in the centre of the view. The scale, form and detail of the subject buildings form an important part of the townscape continuity and setting for the Conservation Area. - from Streetview

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1.3.7 The buildings opposite the site to the north are the beginning of the Bromley Town Centre Conservation Area and consist of a 3 storey terrace of neo-Georgian buildings of a similar scale and form to those in the subject site, while the two eastern corners of the junction include a grand corner entry to The Glades shopping centre (north) and a smaller corner entry to a retail occupier (south), currently Boots.

1.3.8 The wider context of the existing buildings is described in the previous section, however these corner structures have a greater role in the more immediate context of the High St, Ethelbert Rd and the junction of these streets along with Elmfield Rd to the east, leading to Kentish Way.

1.3.9 There is no description provided in the applicant's DAS or the HTVIA for the buildings across the street to the north of the site and no suggestion of any relationship between these buildings or others on the High St. No townscape assessment of the existing buildings in the context of this corner junction is provided and neither the HTVIA nor the DAS address these adjacent related buildings, although they are clearly shown on old maps and photographs (pg.13 of HTVIA) as being of the same time of construction.

1.3.10 The four corner buildings on the High St junction are all of similar height (equivalent to 3-4 storeys), although the overall scale and form of The Glades building beyond the High St is massive. The experience of this building on the High St is of the same height and scale as its adjacent neighbours, however its entrance is designed to be grander and 'over-scaled' for its context and does not share so many similar secondary elements (upper floor window size etc) with any of its neighbours - this is clearly intentional.

1.3.11 The Glades and its southern neighbour, are both late 20th century 'retail style', although built on very different scales, while the two western corner buildings, including those on the site, were built in the 1930s (see next section, likely to be in the period 1933-35) and follow a traditional pattern of ground floor retail and residential (originally at least) to the two floors above.

1.3.12 All four corner buildings share a similar approach to the actual street corner, with a chamfered element to the architecture at the corner, ground level. 3 of the 4 four blocks include entries along their chamfered edges, while The Glades chamfer is so large that the entry, centred along its length is not exactly located on the corner itself. The northern neo-Georgian building does not have a corner entry now, although it may have done in the past.

1.3.13 The design of the C20th block opposite the subject site to the east is an interesting and exuberant example of post-modern design (built in the 1980s?), including curved pediments which clearly relate to the subject site across the road. Its square projecting bay windows and inset corner bay are architectural devices not commonly found on this High St, and it is not possible to identify the present uses within the upper levels from google streetview. However the scale and form and emphatic treatment of the corner and repeating bays of this building follow the pattern of its older neighbours across the street - as you would expect from the Post-Modernist style.

1.3.14 The ground floor frontage treatments to all four buildings, including The Glades, all follow the same rhythm of shopfront 'bays' - whether they are separate shops, double (or more) fronted shops or display windows to generalised retail within (The Glades).

1.3.15 These four corner buildings may all be different in detail, and The Glades clearly uses substantially more grandly scaled elements, however they currently all share a use, an overall scale and massing to the street and present a strongly coherent definition to this junction because of this.



The junction context of the existing buildings, showing each of the four corner buildings - above, The Glades on the left, the main High St access into a major shopping centre with its over-scaled entrance, but street-facing shopfront rhythm following existing patterns at ground floor level. On the right, Boots Post-modern exuberance with footprint, shopfront rhythm and corner treatment all following the pattern of a traditional retail corner. Below, on the left, the subject buildings decoratively celebrating its corner chamfer, while on the right, the building is calmer although the corner has decorative window treatments. Commonalities to them all include pediments and corner chamfers



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1.3.16 In addition, the two neo-Georgian buildings (our subject site and the one to the north in the Conservation Area), also define the entrance to Ethelbert Rd, a pedestrian route of emerging importance, their chamfered corners inviting movement down this secondary street. These buildings also share their origins in an important historical era for the town centre and are among the few remaining representatives of this time; they share strong similarities in the scale of secondary elements like windows and decorative pediments as well as materials. That the subject buildings are more decorative, may well set them further apart from those more typical of the 30s (art deco and moderne styles), however this distinctive atypicality makes them more striking, more memorable and arguably more worthy of retention in terms of the overall townscape quality of the high street.

1.3.17 The applicant's HTVIA, Section 6.0 Townscape and Character Assessment, includes the bare minimum of information about the townscape of either Bromley in general or the High St specifically. This section consists of just 3 pages, one of which is wholly lifted from the council's AAP and the other two are largely a Terrain map and an aerial photograph which just marks the site. There is no exploration of the role of the existing site/buildings in the existing townscape and no visual or movement analysis of the junction and its current corner buildings, all of which contribute to the identity of this location on the High St.

1.3.18 The DAS is similarly thin on actual townscape analysis, quoting parts of the HTVIA, the AAP and the Bromley Masterplan. Most notable is the inclusion of the Vision Statement from the Masterplan, p.14, where a set of "urban design principles set out the key moves and expectations of the masterplan to ensure a high quality of design and urban realm throughout the masterplan site".

1.3.19 The last one of these principles states that projects should "ensure the form and massing of tall buildings is set back from the High Street, and is sensitive to the 'ridge' profile of the town centre topography". This 'key urban design principle' is not addressed in the design process and the proposed design does not follow it at all, nor respond to this point in any way.

1.3.20 Views towards the site looking at the height of the tall building are dealt with in the 'Impact' section of the DAS which presents the proposed new development without any analysis of the qualities of the existing buildings.

1.3.21 The DAS also provides no research or appreciation of the historical period of origin of the subject buildings, however it would be expected that the Heritage and Townscape consultants would have done this to inform the design process. There is no evidence of this being done.

1.3.22 The lack of appreciation of the historical relevance or townscape context of the existing buildings no doubt contributes to the dismissal of the existing buildings in terms of their townscape value and their role in the setting of the conservation area as well as in terms of their role in views out of the conservation area.

## 1.4 The Existing Buildings

1.4.1 The existing buildings themselves have no heritage listing, no local listing, nor are they situated within a conservation area, however the site is adjacent to the Bromley Town Centre Conservation Area (BTCCA), which is immediately to the north, and the buildings themselves contribute considerably towards the setting of this area. The (unadopted) masterplan for the G/10 site identifies the buildings as having townscape value, as does this review.



View of existing buildings from junction of High Street and Elmfield Road

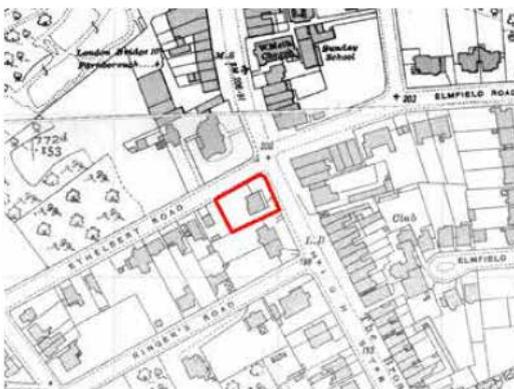


Figure 3.7 OS Mapping 1933



Figure 3.8 1935 image of the High Street. The Site is on the right.



Figure 3.9 OS Mapping 1936-37



Figure 3.10 1935 image of the High Street. 66-70 High Street just further along from Harrison & Gibson Furniture

Part 1 p.13 HTVIA by Icen. If the image dates are correct the building was built by 1935 while the 1933 map shows the villas still in place. Therefore the construction date would be 1933-35, Not later as claimed in various places in the HTVIA and repeated in the DAS.

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1.4.2 The existing buildings are described in the applicant's Heritage and Townscape Assessment as being built some time between 1937 and 1959, however it is clear from the consultant's own evidence (maps and photographs, pg.13 HTVIA), assuming that this information is correct, that the buildings on the site and those to the north across Ethelbert Rd were built between 1933-35. They are not shown on a 1933 map and then appear in both photographs dated 1935 as well as the map dated 1936-37 (see pg.14 of this report). Considering the styles it is likely that both sets of these corner buildings and the Town Church to the rear on Ethelred Rd (to be demolished as part of the Churchill Quarter development), currently form the only remnants of a larger group all built at a similar time in the early-to-mid 1930s, as shown in the historical mapping. That just three of these remain (potentially to be two) enhances the importance of the existing buildings on the site in terms of historical townscape continuity.

1.4.3 The 1920/30s was an important period for Bromley Town, reflecting a time of growth and expansion. Much of the suburban housing around the town centre was built during the this period and there are very few other retail buildings on the High St remaining of this period. Others are notably 54-62 High St, the blocks in front of the Ringers Rd development, which represent both styles of the period - historicist and moderne.

1.4.4 The applicant's description of the buildings on 66-70 High St, while factual in many ways is also quite dismissive of the buildings as merely part of the "wallpaper of the High St", a "conservative and historicist" building (HTVIA p.21) and therefore considered to have 'low architectural and artistic value', 'low historic interest' as well as 'low heritage value'. However, there is no study provided of other Bromley town centre buildings - including those on the opposite corner - of the period identified, nor of the importance of the period itself. Therefore it is hard to see how the historical relevance of the subject buildings can be dismissed so lightly without further investigation, when the evidence provided suggests more could be found.

1.4.5 That the subject buildings are 'historicist' (as are the gothic style Houses of Parliament) is quite possibly correct; they may well have been out of date in their own time, as Art Deco and Moderne became more de rigueur. However, the limited group of this style of 1930s buildings remaining on and around this corner (including the Town Church and the northern group in the CA), clearly express this important period of Bromley Town Centre's growth and history. Their townscape value lies not only in the historical period they represent (remaining elements of which are fast disappearing); but also in their location on an important junction, defining the corners to Ethelbert Rd opposite Elmfield Rd along with the entry to the pedestrianised section of the High St ridge; and, their inherent visual qualities (scale and form, architectural decorative detailing), regardless of whether this conforms to some precise period definition or not.

1.4.6 The lack of specific policy protection for the existing buildings on this site does not mean that they make no contribution to the local townscape, nor should it mean that they can be automatically demolished. The role of these buildings in relation to the adjacent Conservation Area, to the overall street scene, as well as the history and growth of Bromley town centre should be considered by the applicants' consultants as asked for in the Masterplan (unadopted, but much quoted in the applicant's DAS).

1.4.7 In architectural terms the buildings (see photographs on following pages) may not fit neatly into a defined period, however while there are other contemporary, neo-Georgian buildings on the High St, the fact that this one is a more exuberant relic of the same era arguably makes it more worthy of retention for exactly these unusual qualities.

1.4.8 The buildings were designed to turn the corner well and projects a strongly defined frontage to both the High St and to Ethelbert Rd. It does this very well with the materials of the day - brickwork details in varying bond styles and stone-capped pediments and windows.



View of existing buildings from Ethelbert Road showing the stepped down rear and blank frontage to the street edge, as well as the decorative brick capping - presumably original - over the two gates which presumably lead to the flats above the shops as well as potentially a service area.



View of existing buildings from opposite corner junction of Ethelbert Road and High Street - part of the shopfront appears to have been bricked in at some stage, while the upper floors are intact and express a high level of decorative finish.

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The buildings have also lasted well, and/or has been well-maintained, and show no obvious sign of serious decay or subsidence to the public view. The 'lesser frontage' of the buildings, along Ethelbert Rd away from the strong corner, is less prepossessing once the structure steps down to a single storey wall containing entries to the flats above the retail use. These lower sections of the building do not have the charm of the main street frontages, although the brick wall and gated entrances are celebrated with a brick-capped curving minor pediment, and the rear, single storey section of the building could arguably be removed or remodelled as part of a development on the site.

1.4.9 The ground floor elevation is now a standard retail frontage, which wraps around the corner into Ethelbert Rd, and some earlier ground floor windows/doors on this secondary street have been bricked up. However, the existing building provides continuous active retail frontage along its street edge, as it was designed to do and as envisaged by the AAP and all other policy documents affecting this location. Any new building on this site could provide updated retail display windows and a different design approach to using the retail space, but it would not be able to increase the length of retail frontage by much, except perhaps into Ethelbert Rd.

1.4.10 In summary, the existing buildings are unusual examples - unique to Bromley Town Centre - of an important period of development for Bromley. Their architecture expresses an historicist style, described as 'free Renaissance' in the HTVIA, and almost theatrical in expression, including decorative steel Juliet balconies to the gabled sections of the street frontage elevations. The buildings do not conform to the architectural 'rules' of any specific period, however, the few remaining buildings of the 1930s in Bromley are all different and should be celebrated for this, rather than berated for their non-conformity, this one in particular for its more Baroque and expressive character.

1.4.11 The architecture is balanced and well-made; it has been largely well-maintained; it makes a considerable contribution to townscape quality and continuity, to its corner, to the junction and to the overall High St. The architecture, scale and form support the visual setting of the Conservation Area from both views - looking north where the existing buildings and the opposite corner up the High St meld into the streetscape view leading into the Conservation Area; while looking south, the buildings provide further townscape continuity to the Conservation Area, anchoring it as the High St turns slightly at the junction and the site is more in view. (See following section on Views).



View of one of the 'gabled' sections of the main elevation to the existing building showing the detailed brickwork, stone pediments and decorative steel Juliet balcony



Image from p.45 of proposed splayed windows for south elevation of proposal. Inset balconies are also shown.



Proposed typical floor plan from DAS p.45, showing a possible 18m distance to any future development. Most of this space is located on the adjacent site - currently under the same ownership, but this is not necessarily guaranteed in the future - defining an edge for future development on that site but without showing how this could in reality work in accordance with policy.

# 2

## The Proposal

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### 2.1 Wider Masterplan

2.1.1 The proposal application does not include a wider masterplan for either the developer's current landholdings or for the relevant sub-block (Zone 2) of site G/10 of which the site forms a part - i.e: that part of G/10 that sits between Ethelbert Rd and Ringers Rd.

2.1.2 The site is not identified as an appropriate location for a tall building in the Development Plan. The DAS quotes the (unadopted) masterplan for the overall G/10 site throughout the document, however the design does not follow this in major areas, nor does it provide any justification for a significant deviation from the design principles. In particular, the location of the proposed tall building on High St and its proposed height, which would make it the tallest structure on the High St, both in relative and absolute terms, including in relation to known emerging projects.

2.1.3 In order to understand how this proposal would not obstruct future complying developments, an illustrative masterplan including at least the TK Maxx site and preferably all of the Zone 2 sub-block between Ringers and Ethelbert Rds should be provided as part of the application.

### 2.2 Design Quality - Site planning, Layout, Scale and Form

#### Site Planning and Layout:

2.2.1 The site planning as proposed shows the site largely occupied by the building on the ground floor, apart for an area for access to the west which is overhung by upper levels of the building. Up to the 12th floor, the building extends over the access area, but with minor setbacks to the west (although balconies reach to the boundary) and to the south to allow for daylight into residential windows. Above the 12th floor there is a further setback to the west which enables provision of some limited rooftop amenity space.

2.2.2 While 'optimising' the density and use of a site is the aim of residential development as set out in the London Plan, the design compromises made in the proposed residential layout - including proximity to south and west boundaries, 'dual aspect' relying on deeply inset balconies and limited communal amenity space - makes this proposal seem like maximising rather than optimising. An optimum solution should enable high quality apartment layouts, good sunlight/daylight without convoluted window arrangements, without building up to internal boundaries and providing more than adequate communal amenity spaces.

2.2.3 The fact that this building completely occupies the site and includes windows on or close to two non-street boundaries with adjacent development sites would suggest that too much is being squeezed onto the site and this suggests over-development. The windows to the flats on the south elevation of the building are angled to avoid potential overlooking into a possible future development on the TK Maxx site. However, it is stated that any development on this adjacent site would be set back 18m from the proposed windows, in which case the angled windows would not necessarily be required as the separation distance may be adequate.

2.2.4 This begs the question as to whether there is a proposal for the adjacent site already, in which case it would assist the decision-making process if this design could be included as an illustrative masterplan for the greater site, to see how further development might integrate with this proposal and the wider town centre.



The two street elevations (East, High St on the left, North, Ethelbert Rd on the right) of the proposed block, showing its proximity to both non-street boundaries and adjacent buildings. The existing adjacent Salvation Army building to the west is of a very different scale.



View 13 (HTVIA) from opposite the junction of Ravensbourne Road and High Street. The scale of the proposal is emphasised by the mass of the block stretching westwards and its dominance is in contrast to the Ringers Rd development, the tallest building of which is just visible above the retail frontages - top level and roof only.

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2.2.5 It is also interesting to note that the angle of the windows shows the views out to the north-east towards the High St, whereas a more open view with more sun access and the potential for some greenery in sight, would be angled to the south-west. However, there may be future development in this direction and again, a concept masterplan for the whole Zone 2 sub-block would provide a clearer understanding of the potential for future development on the balance of this site area, as well as providing more certainty around design choices.

2.2.6 The overall layout of the apartments per floor is a highly effective insertion of the area into a very tight space and it could be supported as a free-standing tower with clear space all around it. However the overall quality of the flats is compromised by the tight arrangement, close to adjacent boundaries, with 'dual aspect' only created for most of the flats by using an inset balcony as the second glazing aspect. Inset balconies/terraces are quite enclosed spaces and generally function (usefully) as an additional room to the apartment, however they do not provide a complete dual aspect space and are much questioned as solutions to this issue in design reviews in other London Boroughs. The south and east-facing apartments in particular will struggle to not feel like single aspect units. The small west-facing apartment is single-aspect.

2.2.7 The overall floor layout appears to be maximised not optimised by the design compromises.

### **Scale and Form:**

2.2.8 While at 16 storeys the building is not tall in central city terms, in the Bromley High St context this is a very tall building indeed and it will stand at odds with the existing buildings fronting the street. Bromley High St's solid 3/4 storey street edges are continuous along the street, providing a satisfying sense of activity and enclosure in a generous street width, with views above lower buildings and down side streets of taller elements beyond, reinforcing the established urban pattern.

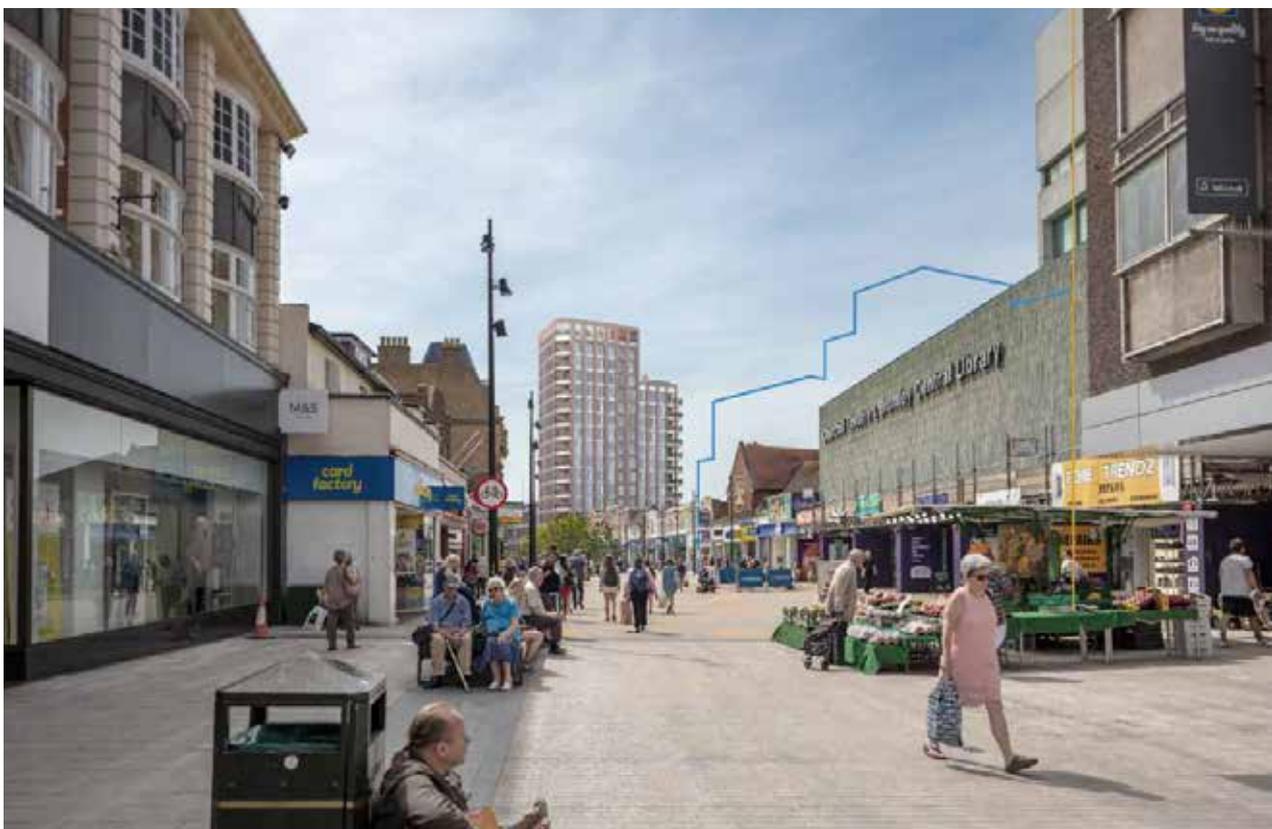
2.2.9 The location of the proposed building immediately on the High St, with no setback or lower foreground built form, is an assertive statement that undermines the established character and quality of the High St and will cause visual harm to the Conservation Area to the north of the site. The building does not define any civic or cultural use that could justify it being the tallest building on the High St, it does not identify any function or activity in particular but does usurp the Churchill Theatre which is the local landmark building, providing civic and cultural identity.

2.2.10 The bulk and massing of the building is particularly overbearing from the south, as seen in elevations opposite and in views (following section) looking north along the High St. The viewer is looking up the hill towards the building, so its height is emphasised by being located on higher ground to start with. As the building is not set back from the High St the full experience of the form and height is in view, looking at the long elevation, which further emphasises the large mass in relation to existing buildings. It appears out of scale and in the wrong location.

2.2.11 The proposed building is too tall for its location and context. As previously noted the site is on an important junction, however, it is not necessarily the most important corner in this junction - where the buildings act as a coherent identity group - nor the most important corner/site on the High St. Therefore it does not justify being the tallest building on the High St, nor does it justify being significantly taller than its existing neighbours on the street frontage, although some height would be feasible further into the site.



View 8 from the western pedestrian bridge, showing the impact on the skyline of the proposed building. The Ringers Rd development can be seen following the ridge line and tree-line rather than dominating the topography



View 16 A cumulative version of this view showing outlined, a possible development on the Churchill Gardens site which sits behind the existing low-rise retail on the High St and in the Conservation Area. The proposed new building - centre of view- dominates all the views looking south down the High St, from within the Conservation Area, whereas the larger proposal viewed beyond the Churchill Theatre and Library entrance would be far less intrusive and cause less harm.

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## 2.3 Views and Townscape Impacts

2.3.1 The views of the proposal commented on in this review are those where the building can be seen and it has some significant impact. The impacts considered are those which affect the skyline, the townscape, street scene and character of the local area.

2.3.2 Views 1-6 & 10 are long distance views and do not reveal the proposal as it is generally hidden by trees or other buildings (I note that the views baseline photographs were not taken in winter as recommended by best practice). Views 7, 8 & 9 show the proposal strongly expressed on the skyline as an isolated tower projecting above trees and other town centre buildings. Arguably in these distant views, the scene will eventually be populated by more tall buildings, however, the height of this one, taller than any other proposed for the town centre, will dominate for some time to come.

2.3.3 As can be seen in View 8 (opposite) from the Western pedestrian bridge, the building interrupts the skyline far more than the existing Ringers Rd development or the St Marks Square tower, which is currently the tallest building in Bromley, although set in the lower South Bromley area. The proposed High St building does not identify any major civic or cultural location nor especially strong transport node or similar community identity site which could justify a landmark scale buildings. Its height and visibility also undermine the importance of the Churchill Theatre, therefore it is hard to see the justification for this as the tallest element in the urban view from these locations.

2.3.4 Views 12, 13 and 14 (see previous page) are all taken looking up the High St, where the proposal is clearly a visually dominant feature, challenging the established character of the High St and distracting from views towards the Churchill Theatre in the Conservation Area further to the north.

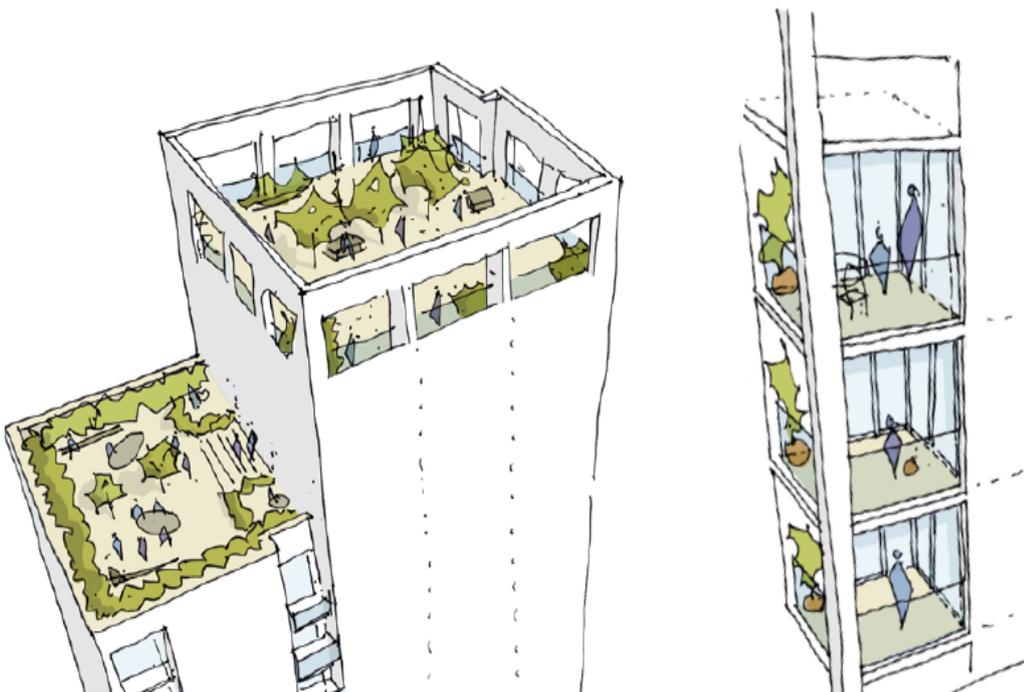
2.3.5 The most important urban design impacts are those experienced at street level and this building completely alters the experience of the street scene, introducing a 'city centre' form directly into a much older and softer urban format and disrupting the established and emerging urban topography. Tall buildings have been visible from the High St in Bromley for some time, however they are always experienced as setback forms, behind the foreground setting of lower and finer grain buildings, the diversity of which is part of the established character of Bromley, which is worth retaining and reinforcing.

2.3.6 Views 15 & 16 are taken from the north (View 16 opposite), from within the Conservation Area, along the level pedestrianised section of the High St, and clearly show that a major development fronting the High St on this site becomes the dominant feature in this view, taking attention away from the buildings and character of the Conservation Area itself. Currently the view is an open one to the sky, where the eye follows the line of parapets of the existing 2/3 storey retail frontage buildings towards the corner, the location of the subject site, and whence it then leads down to the sloping section of the High St.

2.3.7 There is no justification for filling the skyline with a very tall residential building in such a location. The proposed building fills the view, transforming the skyline and undermining the quality and character of the Conservation Area built form. The street scene includes buildings from a range of eras and a range of qualities, but their streetscape scale and form all support a coherent townscape character which would be dominated and challenged by the intrusion of this tower on the streetfront section of the Zone 2 site.



View no. 15, taken further north than no.16 on the previous page. This shows a more 'funnelled' view from the northern section of the High St - within the Conservation Area - towards the proposal. The building completely fills the view, artificially terminating the High St at what is a nodal point of direction change, not a termination.



DAS p.46 Views of possible rooftop amenity space. The upper level is in fact needed for plant and PVs leaving only the lower level available for shared active and/or passive amenity space. This is unlikely to be able to meet the needs of resident children as well as adults.

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## 2.4 GLA Comments

2.4.1 The GLA letter of 16th December 2019 states that the application “does not comply with the London Plan”, although the principle of development is supported in strategic planning terms subject to agreement on affordable housing levels. This review does not address the levels of affordable housing.

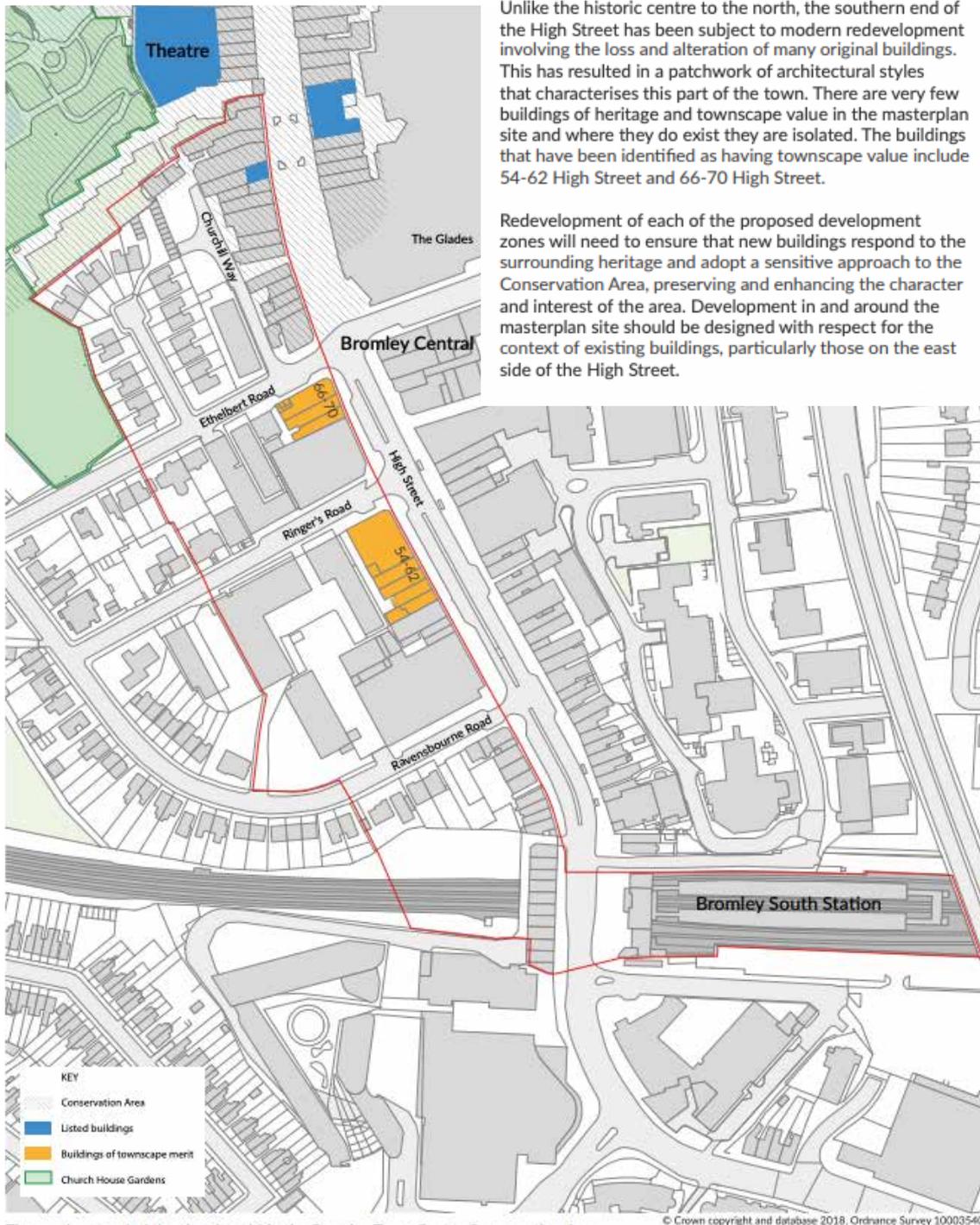
2.4.2 With reference to design issues, the GLA notes, para 50, *“that the scheme does not accord with the Council’s masterplan for the wider site.”* Also, this paragraph suggests that further exploration is done of how the proposed building *“would align with emerging proposals in the area and the Council’s masterplan”*.

2.4.3 Para 51 notes the ownership of the adjacent site, the TK Maxx store, and states that the applicant *“MUST (my caps) demonstrate that the proposal would not preclude development at the neighbouring TK Maxx”* site. Some limited indications of this are provided, but **this should be developed further to show scale and massing, location of tall buildings if any**, typical footprints and how connections at lower levels would be dealt with.

2.4.4 An indicative masterplan for the wider block would demonstrate how all potential built forms could work together to optimise the uses and density on the site, as well as explain further how detailed elements like the proposed angled windows would relate to an adjacent building and whether good separation distances are achievable.

2.4.5 The GLA is also concerned about the provision and use of outdoor communal amenity space which appears to be inadequate as (see image opposite, which apparently inaccurately represents the potential) although the rooftops of both sections of the building are shown as amenity space, the upper level is likely to be needed for plant and energy production, leaving just the lower rooftop for all communal amenity needs.

2.4.6 In terms of heritage and townscape the GLA notes that the existing buildings are noted in the G/10 masterplan as having townscape value, but does not comment on the impact of the loss of these buildings on the street scene or the conservation area. The GLA also notes that the proposed building would be visible from within the conservation area and states that it would cause less than substantial harm to the significance of the conservation area.



Unlike the historic centre to the north, the southern end of the High Street has been subject to modern redevelopment involving the loss and alteration of many original buildings. This has resulted in a patchwork of architectural styles that characterises this part of the town. There are very few buildings of heritage and townscape value in the masterplan site and where they do exist they are isolated. The buildings that have been identified as having townscape value include 54-62 High Street and 66-70 High Street.

Redevelopment of each of the proposed development zones 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 and interest of the area. Development in and around the masterplan site should be designed with respect for the context of existing buildings, particularly those on the east side of the High Street.

Page 8 from the (unadopted) Bromley Masterplan identifying the subject site, along with buildings of the same era of mixed styles - at 54-62 High St as being of townscape value.

# 3

## Summary and Conclusions

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### 3.1 Summary

#### **Townscape character:**

3.1.1 The proposal fails to appreciate or respond to (in the evidence provided, the DAS or HTVIA) the prevailing townscape character of the Bromley town centre and High St area, where there is a clear and characteristic pattern of lower buildings (3-4 storeys generally) fronting the High St, with taller buildings set further back, often to a rear block. This is a clear and existing pattern shown by analysis in both existing and emerging developments, and is also expressed in the (unadopted) masterplan for Site G/10 in The Vision Statement, p14, final bullet point.

3.1.2 While this masterplan has no policy status, it has been quoted and used by the applicant's architects in their DAS to support their proposal. However, the DAS shows a design process which is selective about which design principles that the proposed scheme for this site actually follow, and this one has been ignored in consideration of a chosen design for the site.

3.1.3 The townscape character and qualities of the Conservation Area will be harmed by the location of this building which will dominate the Conservation Area from its location immediately outside the area but highly visible - in fact, the focus of visual attention - from within it.

#### **Existing buildings:**

3.1.4 In terms of the High St context, the scheme fails to consider the role of the existing buildings in the character and quality of the existing High St in either townscape terms or in terms of their potential role in the history of the town centre, in particular the era that these buildings represent - a significant growth period of the town centre nearly 100 years ago.

3.1.5 While the buildings are not protected by any heritage listing or being within a conservation area, their position adjacent to the Town Centre Conservation Area and visually connected to it - therefore part of its setting - as well as the clear 'gateway' relationship of the existing buildings with those across the street to the north (to Ethelred Rd), makes a strong case for their retention, as together they provide an attractive and highly legible remaining example of the inter-war 20th century architecture of Bromley town centre.

3.1.6 The architecture of the existing buildings may not represent the best of its type, however the façades above ground floor are attractively and unusually decorative for their era, they are in relatively good condition and with normal maintenance they would last for many years to come, contributing positively to the overall development of this area by providing positive visual continuity between Bromley's past history and its emerging future, as well as supporting the Conservation Area townscape character.

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### **Comprehensive Masterplan for wider site area:**

3.1.7 The proposed scheme fails to provide an understanding of how the project could be developed as part of an integrated, phased development approach for the Zone 2 sub-block of site G/10 within which the proposal sits (the area of G/10 between Ringers Rd and Ethelbert Rd).

3.1.8 As a minimum it would be reasonable to expect an indicative masterplan to be provided for the possible longer-term redevelopment of all the applicant's adjoining land-holdings, i.e.: including the TK Maxx building site next door, and to show how the immediate detailed application would form a first phase of this. However, in order to understand how further development could happen on the balance of the sub-block, an overall indicative masterplan for the future development of the adjacent land (Salvation Army etc) would also be a useful tool in order to demonstrate that there would be no future adverse impacts on this site from the proposed scheme.

3.1.9 The lack of such a masterplan, even at a concept level, leaves too many questions unanswered and makes planning decisions more difficult.

### **The Proposed Building:**

3.1.10 The proposed building is 16 storeys high, including taller floor to floor heights at the ground and first floors, taller than any other buildings on or close to the High St, including those potentially proposed for the Churchill Gardens site.

3.1.11 Arising from the analysis in the previous sections, the building is predicated on the demolition of the existing buildings in their entirety, which is not justified. The scheme proposes a tall building which almost entirely fills its site and rises directly from the street frontage, with no setback or amelioration of the visual impact of such an intrusion, hence no response to the prevailing townscape character of lower forms along the High St and taller forms behind.

3.1.12 The height of the building is justified in the architect's DAS by its location on an important corner. While it is definitely an identity corner in Bromley Town Centre (although not necessarily the most important one), there is no requirement in good urban design principles to add tall buildings to important corners. Landmark or identity structures usually include or bring civic, cultural or community meaning to a place in order to justify additional scale.

3.1.13 It would be possible to justify a tall building on this section of the G/10 site if it were to be set significantly further back from the High St and the main bulk of the existing buildings were to be retained. However at 16 storeys the proposal is taller than any of the buildings currently proposed on the Churchill Gardens site to the north and as the 'flagship' site/development on the overall area of G/10, it seems logical that this potential development would also include the tallest buildings.

3.1.14 Therefore a tall building on the subject site should not exceed the absolute height of the tallest to the north, as stepping down the site should be reinforced by stepped building heights as well. This follows the clear townscape pattern, also established in existing buildings, of the building height stepping down the hill following the contours and topography.

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## Views

3.1.15 The views shown including the building clearly express its potential dominance in the visual and experiential character of Bromley Town Centre from both distance and close up.

3.1.16 The distant views show the building often hidden by trees, however this should be revisited in winter when the scenes are less green. Notwithstanding this, there are a significant number of distant locations from where the proposal would be highly visible and over dominant.

3.1.17 The closer views of the proposal, from within and towards the Conservation Area, are more marked, with the building becoming a strong central element in views looking south along the High St from inside the Conservation Area. In views from the south, up the sloping High St from the railway station, the building appears more massive as it is located on higher ground and the viewer is looking directly at the long elevation which adds to its sense of scale. It is also in these views clearly 'on' the High St, not set back behind the foreground buildings as per the established townscape pattern.

## 3.2 Conclusions

3.2.1 To summarise the major design issues, is clear that the proposal fails to meet the planning policy requirements for this site, in urban design terms, in the following four major areas:

- Understanding of Townscape Character;
- Approach to the existing buildings;
- Planning context and lack of a comprehensive masterplan;
- Scale, form and impacts of proposed tall building on the adjacent Conservation Area street scene;
- Scale impacts of proposed tall building on the existing town centre topography and skyline.

3.2.2 Both the loss of the existing buildings and the introduction of a completely new and incompatible building typology to the High St will cause harm to the setting and views out of the Conservation Area, as well as to the overall townscape and street scene of Bromley High St itself.



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