



P Wilson
Planning Department
LB Bromley

Dear Mr Wilson

14/03502/FULL1 | Demolition of existing dwelling and erection of 2 two storey buildings with accommodation within the roofspace comprising 8 two bedroom flats with landscaping, two new vehicular accesses and 12 parking spaces. | 61 The Avenue Beckenham BR3 5EE

This is an extremely unwelcome planning application in the important Downs Hill Conservation Area. It contravenes many Policies within the UDP, ignores much of the advice given in the pre- application advice letter dated 13th January 2014 (Appendix 2) and generally would set an unfortunate precedent.

Bulk and mass

Both proposed blocks are clearly not in keeping with the bulk and mass neither of the neighbouring buildings nor with buildings typical of the CA. The north block is much larger than the existing property and would dwarf the neighbouring 67 Downs Hill: -



As the above pictures show, the existing property is smaller than its neighbour, 67 Downs Hill.

The ridge lines of both proposed blocks would be higher than their neighbours, particularly in the case of block B.



The footprint of the north block is significantly larger than the existing property and also extends some way beyond the existing front building line for this site. Further, the west block does not respect the rear building line which was specifically requested in the pre-application advice letter which stated ‘... the front and rear building lines should be respected.’

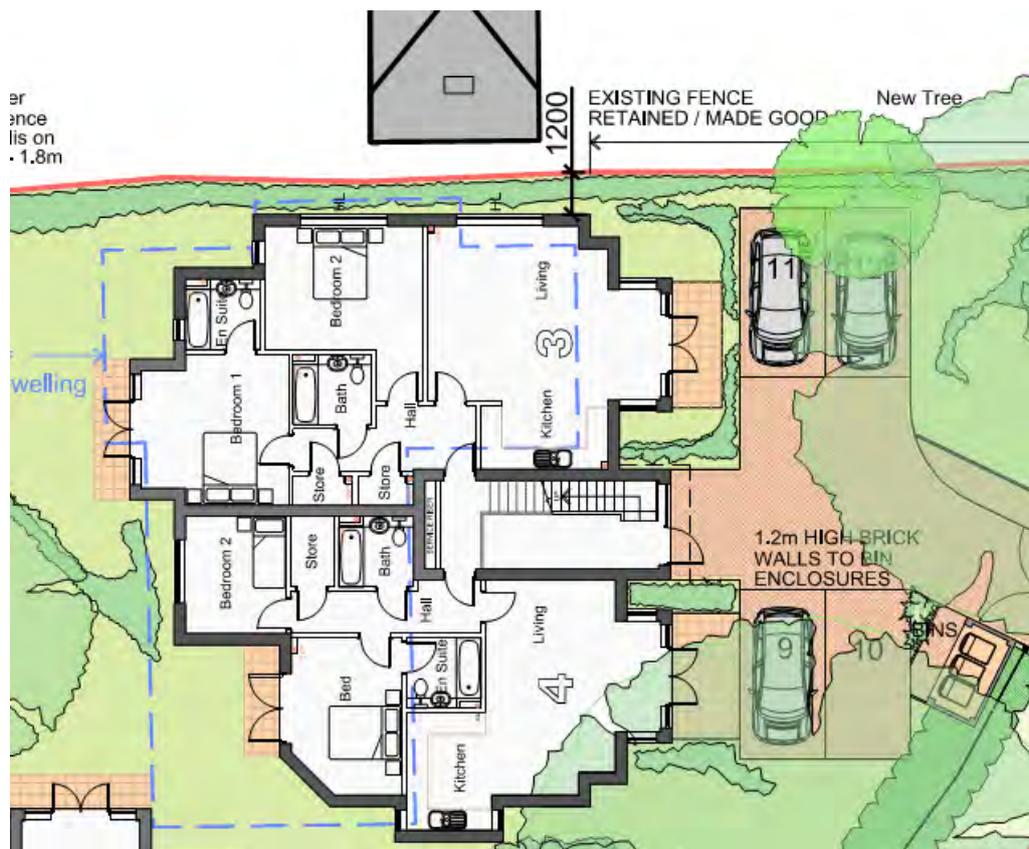
We have in our possession a dimensioned and annotated version of the document called ‘The Proposed Site Plan’ which we attach for your convenience at Appendix 1. Amongst other things, we notice that the proposed side space of the north block is only 1.2 metres whereas the pre-application advice letter requires 2 metres: -

‘A minimum of 2 m side space would be expected for the full height and length of the flank elevations....’ [from the pre-application advice letter]

The Applicant’s Planning Statement says: -

8.29 Within the pre-application report a 2 metre side space was requested and has been incorporated into the final design.

This self-evidently misrepresents the position shown in the diagram below: -



Further, overhanging guttering etc. would mean that this 1.2 metres would be further reduced and would not extend for the full height and length of the flank elevation.

Character

We considered that the proposed buildings are out of character with the Conservation Area. They are: -

- Very bulky, leading to a sense of dominance over neighbours
- Have architectural features that are unprecedented within the CA including: -
 - Recessed balconies in the roof pitch
 - Balconies to the front of the property at ground and first floor level built out in front of the main elevation
 - Glass balustrades and recessed balconies with coloured spandrel

panels

- There are no flatted developments in this part of the CA and indeed the only flatted development in the CA at all (at 113 Foxgrove Road) cannot be used as a precedent as specifically stated by the Planning Inspector:

13. Despite the considerable concern expressed at the Hearing, *I do not consider that allowing this appeal would set a precedent* [our Italics] for other flatted developments in the Conservation Area. [Appeal Decision: Appeal C - Ref: APP/G5180/E/08/2075382 113 Foxgrove Road, Beckenham, Kent, BR3 5DA <http://www.pcs.planningportal.gov.uk/pcsportal/casesearch.asp> under ref: 2075382]

- Sections 3.1, 4.3, 8.10 and 8.35 amongst others of the Planning Statement provided by the applicant refer to contemporary design. However, contemporary design is inappropriate and any proposed building should be in the neo-Tudor vernacular as required by the Downs Hill SPG.

Amenity Space

With a design capacity of 31 people, there is minimal outdoor amenity space.

Loss of privacy

The first floor balconies on the rear elevation of Block A are very disappointing and will allow overlooking into the rear garden of 59A The Avenue. We note that the pre-application letter stated ‘... rear balconies should be avoided’.

Similarly, the rear balconies of Block B will also intrude on the privacy of neighbours.

Amenity of future occupiers

Some of the rooms in the proposed buildings appear to be particularly poorly served with regard to natural sunlight. In particular bedroom 1 of flat 7, bedroom 2 of flat 3, the so-called dressing area of flat 8 are notably poorly lit. Further, one bedroom in each of flat 5 and 6 each only have a relatively small north facing window (i.e. a single aspect) which was something the pre-application letter stated should be avoided.

Landscaping

No path is shown between the proposed bike shed and the road. Walking across the muddy lawn in winter will discourage residents from using bicycles.

We wonder about the appropriateness of grassed areas underneath the trees on the front boundary. We doubt whether grass in this area would survive and would suggest shrubs suitable for this environment.

We are concerned that because the car parking areas are so tight, cars might encroach upon soft landscaping areas as they attempt to manoeuvre into position. As such, planting in vulnerable areas should be sufficiently robust, or protected for example by a post, to protect it from encroachment by vehicles.

Refuse

The size and number of bins appears inadequate for the design occupancy of 31 people. At least four containers of each type are needed for each block: paper, glass/metal, general and food waste.

The bin enclosures should be of high quality facing materials as they will be visible from the road

Transport

Policy T13 of the UDP applies. The Avenue is unsuitable for this development.

Boundary treatments

A condition should be placed over the nature of the 'metal railing fence' to The Avenue boundary. Some metal railing fences are hideous.

For all these reasons we would ask you to refuse permission for this application.

Yours sincerely

Ravensbourne Valley Preservation Society

Appendix one





Town Planning

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DX5727 Bromley

Mr Ian Coomber
Stiles Harold Williams
69 Park Lane
Croydon
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13th January 2014

Dear Mr Coomber,

Re: PREAPP/13/00488 – 61 The Avenue, Beckenham BR3 5EE

Proposal: Demolition of existing dwelling and erection of a part two, part three storey block of 9 flats

Thank you for your letter and informal plans of 19th December and our meeting of 8th January.

This proposal consists of the demolition of the existing two storey detached dwelling and the erection of a two/three storey block providing a mixture of one and two bedroom flats with nine parking spaces to the front of the site. No elevational details have currently been provided and as this response focuses upon the principle of the proposed development. The site is located within the Downs Hill Conservation Area and a copy of the Council's Supplementary Planning Guidance for this was provided at our meeting for your information.

Should this new proposal be submitted as a formal planning application I consider that the policies of the Unitary Development Plan (UDP) that would be most relevant to the consideration of an application of this type are:

BE1 Design of New Development
BE11 Conservation Areas
BE12 Demolition in Conservation Areas
H1 Housing Supply
H7 Housing Density and Design
H9 Side Space
NE7 Development and Trees
T3 Parking
T18 Road Safety

Supplementary Planning Guidance 1 and 2
Supplementary Planning Guidance: Downs Hill Conservation Area

London Plan Policy 3.4 Optimising Housing Potential
London Plan Policy 3.5 Quality and Design of Housing Developments

The Mayor's Housing Supplementary Planning Guidance

The National Planning Policy Framework

Bromley's policies and Unitary Development Plan can be viewed on the Council's website: www.bromley.gov.uk/environment/planning/.

In determining any application, the key considerations would include impact upon the character and spatial standards of the conservation area, the amenities and living standards of future residents, adequate parking arrangements and any harm resulting from the those provisions, the removal and/or retention of any trees on the site as well as the visual impact upon the amenities of neighbouring residents.

History

Two applications for development to the existing dwelling have been previously permitted, namely 99/01706/FULL1 for a single storey front and rear extension with a two storey side extension, and 97/02028/FUL for single storey front and side extensions.

Prior to this time applications for housing development on the site were refused by the Council; 81/01123 for two detached houses and 82/01136 for four terraced dwellings. The application for two dwellings was subsequently allowed at appeal, although of course not implemented, and given the amount of time that has passed and the policy changes since the Inspector's decision an assessment of the degree of weight to be attached will need to be made during the application process.

As discussed during our meeting, two applications for a block of 9 flats was refused at No.55 in 1897 and 1989 with the creation of the conservation area taking place in 1989. Whilst a period of time has passed since these applications, it should be noted that such development has been previously resisted by the Council in the near vicinity of the proposal site and that No.55 and the site now fall within the Downs Hill Conservation Area.

Trees

Trees are set within the site and to the front boundary with The Avenue, although none of these are subject to a preservation order they are protected by virtue of the conservation area designation. As such any planning application would need to be accompanied by a BS5837 survey and arboricultural implications assessment. Although it would appear that the proposal would not involve the direct loss of trees, there may be an impact due to the need to avoid the root protection areas of trees.

Highways

No objection is raised in principle to the provision of one space per unit proposed for the development, or the impact upon the existing highway in terms of safety or visibility. It is requested that a survey of the condition of the unmade road be undertaken prior to any development and details of how any damage will be repaired post-development. Such information should be provided as part of the application. Details for waste

collection will also need to be provided together with storage for cycles. The parking bays should measure the minimum requirement of 2.4m by 5m with at least 6m in front of each space.

Conservation Issues

The existing dwelling is not considered to be of any architectural merit and makes a neutral contribution to the conservation area which is typified by its cohesive neo-Tudor vernacular. I would note that the property, by reason of its scale and design, does accord with the prevailing character of the conservation area, that being large detached dwellings set within well-proportioned plots. However, the demolition of this dwelling is unlikely to be resisted provided a suitable development proposal was acceptable.

The development as proposed is considered to be out of character and would present a bulky addition to the conservation area. It is considered that even a revised design for such a proposal is unlikely to overcome such concerns. Should a revised proposal be formally submitted, a good quality of landscaping will be expected and a streetscene elevation should be submitted. The presentation of 3D renderings of the proposal was discussed at our meeting and I would encourage the submission of such material as part of any application.

Comments

In its current form it is my view that the introduction of this proposed development would be harmful to the character of the conservation area and is unlikely to be considered acceptable. Whilst the northern two storey section occupies a similar footprint to the existing dwelling, the development of a single block presented to the entirety of the curtilage to The Avenue would fit poorly within the context of the existing neighbouring properties and the vernacular of the conservation area.

On this basis it was discussed that a revised design of two separate buildings would be a more preferable form of development, although the acceptability of any such scheme would need to be assessed at the application stage and without any drawings I cannot comment as to how favourably this would be received.

Consideration must be given to the impact of the bulk and scale of any design upon the character of the conservation area together with the streetscene in general. The topography of the site creates a lower ground level to the western boundary with No.59a whilst the ground level to the north is in common with that of No.67. A minimum 2m side space would be expected for the full height and length of the flank elevations and the front and rear building lines should be respected.

By virtue of the introduction of development to the west of the site, some impact upon overlooking and daylight is likely to the residents of No.59a. The current proposal uses the ground levels to have a three storey block to the ridge line of this property with the ground floor being set below that of No.59a. Whilst this would mitigate some of the impacts, I am of the view that the third floor – if retained – be given careful consideration of the affect it would have upon those neighbouring residents and that flank windows and rear balconies should be avoided.

In accordance with the Mayor's Housing SPG it would be expected that all room sizes comply with the expected as opposed to minimum thresholds and that single aspect rooms be avoided, in particular those north facing to the rear of the development. Adequate amenity space should be demonstrated for each flat and the internal circulation of the development should be in accordance with the Mayor's guidance.

The development should seek the Secure by Design accreditation and landscaping should be used imaginatively to achieve this with unsightly and abrasive security measures avoided. This would also apply to the front boundary treatment and its presentation to The Avenue. I would advise that PC Mark Pollard be contacted prior to the submission of any planning application, who can be reached on 020 8284 8889, or mark.pollard@met.police.uk.

I hope that this letter provides some guidance to the main considerations and information required. As part of any planning application the following documents are likely to be required in addition to scaled elevations and floorplans. A full explanation of these requirements can be found at:

http://www.bromley.gov.uk/downloads/file/875/local_information_requirements_notes

Applications normally take about 8 weeks to determine. They can be decided by officers under delegated powers or by elected Members at the Planning Committee. If the application is reported to Committee, you are entitled to attend and speak for 3 minutes. This is subject to a registration procedure which can be viewed on our website.

You should appreciate that this is an informal opinion only and that it is made without prejudice to the determination of an application as each case is determined on its own merits in light of the relevant planning policies of The London Plan, the adopted Unitary Development Plan (2006) and any other material land use planning considerations. Accordingly, the only way to test this is by way of a formal application.

You are advised that the proposed development may be liable to a payment under the Mayoral CIL. The Mayor of London introduced charges for most new development, including residential development with effect from 1 April 2012. You are therefore advised to contact the Local Planning Authority for further advice should permission be granted.

I hope that this information.

Yours sincerely,



Peter Wilson
Planner
Development Control West