

Planning Department
Bromley Council
Civic Centre
Stockwell Close
Bromley BR1 3UH

Babbacombe Road Residents' Association
58, Babbacombe Road
Bromley
BR1 3LW

23rd January 2018

Dear Sir/Madam,

RE: Planning Reference: 17/05790/FULL1

As Chair of the Babbacombe Road Residents' Association I hereby OBJECT to the above planning application on the following grounds:

Problems Arising from Ad-Hoc Planning

This application represents just the first stage of the development of the Bromley North site. The Bromley Town Centre Area Action Plan requires the creation of a "Master Plan" for this site which would ensure an integrated and coherent scheme. This premature application from *BeLiving* represents ad-hoc and opportunistic development which is contrary to this existing LBB policy requirement.

The absence of an integrated Master Plan means that the aggregate impact on infrastructure from the redevelopment of Bromley North has neither been estimated by any party nor publicly consulted upon. The Developers' portrayal of the many environmental, infrastructural, heritage and social impacts of this proposal as if it were an isolated development is therefore misleading. The impacts from development of the whole site need to be fully understood before permission can be granted to build on any one part.

Dramatic Alteration of the Area's Architectural Character

The north of the Town is generally very low-rise in nature with the majority of buildings approximately 2-3 storeys in height. The proposal for a 23-storey apartment block is an extreme departure from this and would dramatically affect the architectural and social character of the area. This would be in direct conflict with LBB's draft Local Plan policy 37 which requires that developments "should complement the scale, proportion, form, layout and materials of adjacent buildings and areas."

As the proposed building will overpower neighbouring residential areas it is also contrary to the Core Planning Principles of the NPPF which is to "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings". The Developers have produced no evidence to demonstrate otherwise. Development on the proposed scale is also likely to undermine quality of life and community cohesion in the neighbourhood. This is contrary to the intentions of para. 69 of the NPPF.

Parking

Despite unequivocal feedback from residents at consultation, the developer has refused to apportion space for tenant parking. Underlying this decision is an idealistic but unrealistic assessment of every-day suburban car ownership or usage. Evidence from some of the other new developments in Bromley town centre where new tenants who have been denied parking permits suggests that they simply park as near as is permissible. This merely shifts the problem of overcrowded parking to a nearby location down the road.

Bromley's own draft Local Plan suggests a minimum of 0.7 car parking spaces for a 1-2 bed property in this type of location. This would result in a minimum requirement of 150 spaces for the 215 proposed apartments. The current proposal clearly fails to reach this requirement.

An evidence-based policy for parking in central Bromley needs to be put in place before planning permission is granted for any large-scale developments.

Safeguarding Suitable Land at Bromley North

The Bromley Area Action Plan 4.8.30 requires the safeguarding of suitable land around Bromley North station to ensure that the future expansion of transport links is not precluded. This safeguarding “is to be shown as part of the masterplan for the site with a requirement to retain that safeguarding in any subsequent planning permission granted”. The application ignores the requirement to safeguard land for this purpose and is therefore in conflict with this pre-existing LBB policy.

Heritage

The Council has a responsibility to protect and enhance the setting of the Grade II Bromley North station building and the adjacent Conservation Area. The current proposal is in direct conflict with this as well as with policy 42 of LBB's draft Local Plan and para 129 of the NPPF.

At 23 storeys, the proposed development will adversely affect the setting and views within and from the adjacent Conservation Area contrary to policy 42 of the draft Local Plan as well as the Historic England advice on tall buildings as adopted in LBB's draft Local Plan policy 47 and, again, para 129 of the NPPF.

The application states that Historic England have been consulted on the development but that their response is not yet available. A range of building heights should be assessed for their impact on nearby heritage assets and as viewed from a variety of viewpoints. Appropriate heights for buildings can only be determined after a formal Heritage Assessment is carried out.

Water Infrastructure

Many residents in the Bromley North area already experience water-pressure and sewage problems. In Thames Water's response to the LBB draft Local Plan they identified that the water mains at Bromley North were "running close to or at capacity" and that "the waste water network capacity is unlikely to support the demand anticipated from this development". They conclude that "strategic drainage infrastructure is likely to be required."

The Council should require that the broad redevelopment of the area becomes an opportunity to overhaul these documented infrastructure deficiencies. The current planning application does not engage with these issues at all.

Fire-Risk

Although a building of 23-storeys with a single stair-well may meet current fire-safety guidance, should not the Council assess whether this guidance is likely to be superseded within the projected lifespan of the building? Given that there may be up to 400-500 tenants in the building and also that rescue by Fire Services' ladder is limited to about eight storeys, a single stair-well building of this size would seem unnecessarily risky.

Kind Regards

Patrick Holden

Chair

Babbacombe Road Residents' Association