

1. DETAILS OF THE DEVELOPMENT

Ref: 19/05846/PRE
Location: 2 Bensham Lane CR0 2RQ
Ward: Broad Green
Description: Demolition of existing single storey commercial building and construction of mixed development of commercial/residential use in a single block a maximum of 11 storey in height to provide 60 new homes and ground floor commercial floorspace with alterations associated landscaping, new highway access and car/cycle parking as well as bin storage.

Applicant/Agent: The Oakwood Group
Case Officer: Christopher Grace

2. PROCEDURAL NOTE

- 2.1 This proposed development is being reported to Planning Committee to enable Members to view it at pre application stage and to comment upon it. The development does not constitute an application for planning permission and any comments made upon it are provisional, and subject to full consideration of any subsequent application, including any comments received as a result of consultation, publicity and notification.
- 2.2 It should be noted that this report represents a snapshot in time, with negotiations and dialogue on-going. The plans and information provided to date are indicative only and as such the depth of analysis provided corresponds with the scope of information that has been made available to Council officers. Other issues may arise as more detail is provided and the depth of analysis expanded upon.
- 2.3 A planning application for the proposed development would be referable to the Mayor of London under the Mayor of London Order 2008.
- 2.4 The applicant presented the pre-application enquiry to the Greater London Authority (including consideration by Transport for London) for an opinion. The meeting took place on 27th November. A summary of the GLA comments are contained as part a planning addendum to this report.
- 2.5 This pre –application report aims to provide Members with sufficient information for effective engagement with the scheme and covers the following points:
- a) Executive summary of key issues with scheme
 - b) Site briefing
 - c) Place Review Panel feedback
 - d) Summary of matters for consideration
 - e) Specific feedback requests

3. EXECUTIVE SUMMARY

- 3.1 The proposed scheme is for the demolition of a single storey commercial warehouse/retail building and the erection of a single block 11-storeys in height. The new building would at ground floor level consist of a commercial unit 356sqm with bin storage, bicycle storage, associated communal areas, amenity space alongside wheelchair accessibility parking spaces accessed directly off Bensham Lane and residential entrance foyer leading to 60 flats above with communal terrace areas; plant area to be located at basement level.
- 3.2 The scheme has developed through a series of pre-application meetings with officers and has consideration by the Place Review Panel (PRP) on 29th October 2020. A summary of the Panel's feedback is included within this report.
- 3.3 The site is well located within a high PTAL (5), closely located to public transport, local shops and services and is 66m to London Road (A235) which is a main artery road (TFL). It lies just outside the Broad Green Local Centre beyond the District Centre boundary and falls within the environs of the Broad Green specific policy. Due to its location it is considered that an intensified development would make the best use of sustainable transport and services but an appropriate development also needs to respond to the suburban context (detached two storey houses) adjacent.
- 3.4 The application lies outside of the town centre but there are a number of tall high buildings ranging between 8 and 12 storeys in height in close proximity (within 150m of the site). The increasing heights are felt to be a good mechanism for responding to the change at this point. This element of the proposal would exceed place specific policies but this is considered to potentially be appropriate if a scheme of very high quality can be secured (subject to townscape views), owing to the sites shape and location. Whilst further design development and confirmation on quality of living accommodation and external spaces is still required, the applicants do appear to take a logical and well considered approach to the site layout, massing, bulk and design, Further refinement is required in regards to detailing and materiality, as well as some additional testing in terms of access, appropriate commercial use and quality of communal and playspace at ground and upper levels.
- 3.5 As currently set out the proposed affordable housing offer would exceed the minimum 30% policy requirement, with this currently proposed at 50% affordable housing (70/30) split.

4. SITE BRIEFING

- 4.1 The site lies on the east side of Bensham Lane, which connects with London Road (A235) and is within 106 metres of the District Centre and approximately 850 metres walk from West Croydon Railway Station, as well as being within close proximity to numerous bus routes at its entrance point.



Fig. 1: Site Location shown in red (Left) and Google Map (right)

- 4.2 The site contains a single storey profiled cladded warehouse/commercial building located on an irregular shaped triangular area fronting on to Bensham Lane. The site has a wide pavement frontage with several drop kerbs many of which are redundant with servicing taking place directly off Bensham Lane. The site consists of a timber merchant with small retail element, a mixture of ancillary A1 (shops) and B8 (storage or distribution) uses. The building is classified as within a Tier 4 Employment Area. An independent marketing report has identified the site as being in very poor condition of repair, with large areas not suited for current industrial market. The overall site has an area of 0.1 hectares.
- 4.3 To the north and widest part of the site lies a shared vehicle access point to a previously light industrial site used for large deliveries which is currently being redevelopment to provide 20 residential units.
- 4.4 The surrounding properties are a mixture of styles and forms, with two-storey terrace houses to the north and opposite with two storey detached houses and 9-storey Council block of flats and cottages to the south and 8 storey block of flats falling to 4 storeys opposite to the south and west.



Fig. 2: Application Site (Left) and View from London Road with site in centre (right)

- 4.5 The building occupies almost the entire footprint of the site. There are no protected (TPO) or street trees associated with the site or its frontage. The building is located within an Archaeological priority area.
- 4.6 The site has a PTAL (Public Transport Accessibility Rating) of 5. The site is located within an area of low risk of surface water and is located within an area where there is potential for groundwater flooding to occur at surface.

Relevant Planning History

- 4.7 Relevant planning history for this site including that of adjoining site is identified below:-

2 Bensham Lane CR0 2RQ

97/01751/P – Alterations; use of part of warehouse for sale of golfing equipment. (Permission granted 25/09/1997)

18/05505/PRE- The erection of a ten storey building comprising of 70 flats

19/05846/PRE- Demolition of the existing building and the erection of a single block of 69 flats and 450 sqm of ground floor commercial floorspace

20/01831/PRE- Demolition of existing building and erection of a single block of flats and re-providing the existing ground floor commercial.

Barnacle Works at Land rear of 2 Bensham Lane CR0 2RQ:

18/04537/FUL – Planning permission granted for demolition of existing buildings and erection of 3no. replacement buildings ranging from 2 to 3 storeys in height comprising 20 residential dwellings plus associated car and cycle parking with hard and soft landscaping measures (currently under construction).

19/02461/CONR- Planning permission granted for demolition of existing buildings and erection of 3no. replacement buildings ranging from 2 to 3 storeys in height comprising 20 residential dwellings plus associated car and cycle parking with hard and soft landscaping measures.

1-40 Dartmouth House Elmwood Road CR0 2SL:

18/00250/FUL – Refurbishment and improvement works to the existing high and low rise residential blocks on the estate, including provision of storage areas, landscaping (with new play area) and car parking (currently under construction).

Proposal

- 4.8 The proposal currently includes the demolition of the existing commercial building and redevelopment to provide a single 11-storey block with commercial ground floor with 60 flats above.
- 4.9 The ground floor commercial use would provide 356sqm floorspace – use classes proposed B1(c), B2, B8, D1 with employment for 12 people (based on floor area),

Flats to consist of 21 one bedroom units, 25 two bedroom units and 14 three bedroom units to include 50% affordable housing (70/30 tenure split between affordable rented and intermediate homes).

4.10 The proposed block would rise from 4 to 11 storeys from north to south, with the rear elevation extending along south/east boundary of the site. The building would step up three levels and include communal gardens at each level. From the north, the foot print of the building would be set back from the front boundary line for two thirds of the site to provide parking area, landscaped garden, seating, communal area and improved public realm



Fig. 3: View of proposal from London Road (left), view from Bensham Lane (right)

4.11 At the southern tip of the site the proposal would provide the entrance to the commercial ground floor unit accessed across a landscape approach including visitor cycle rack external seating and planters. This directly faces towards London Road. Access to the residential flats would be from recessed lighted covered entrance point facing directly off Bensham Lane.

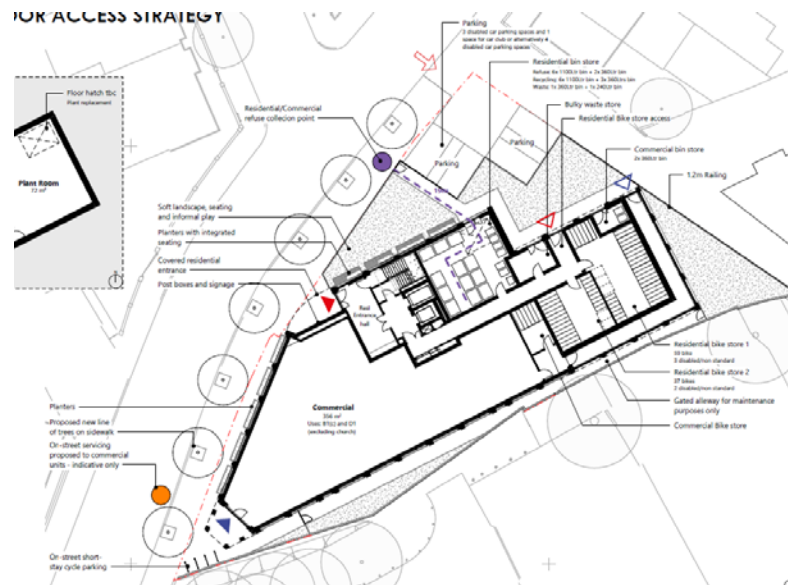


Fig. 4: Ground Floor layout and external area



Fig. 5: Image of residential access point along Bensham Lane

4.12 The proposal would include on-street servicing and deliveries of the commercial unit and residential accommodation. The development would remove the redundant crossovers and reinstate the pavement at these points and introduce a new crossover to provide access to four new parking space (four disabled bays including a car club).

4.13 It is understood that the applicant is intending to submit their planning application in January 2021.

5. PLACE REVIEW PANEL FEEDBACK

5.1 An earlier iteration of the scheme was presented to the Council's Place Review Panel on 29th October 2020.

5.2 The Panel generally provided some support for the scheme which at the time was presented as seeking to provide 100% affordable accommodation. The panel's main comments were:

- The Panel advocate the simplification of the massing and volumes and encouraged the Applicant to focus more on the ground floor condition and public realm.
- There could be greater modulation of height, particularly at the Western corner. The corner could be reinforced with additional height the North-Eastern edge becoming lower to give a more sensitive transition to the 2 storey housing.
- The prominent corner should be the focal point of the scheme. The proposal should celebrate the residential entrance

- The Panel noted that introducing a second core would give greater flexibility in terms of volume and height. The internal layout creates long corridors which do not have a lot of natural light
- Not satisfied with the approach to parking, public realm and communal amenity. The location of the refuse store and parking could have a negative impact on the street scene. The development should be designed around the public realm, rather than the other way around. The current plan form fragments the landscape and public realm into small, unusable pockets. These spaces feel leftover and would be poor quality.
- The applicant should test an option where the scheme reinforces the building line to Bensham Lane, rather than aligning with the Southern Boundary. A consolidated communal amenity space could then be formed to the south of the building. Parking could either be provided to the side of the building or along Bensham Lane.
- The Applicant needs to have a clearer idea of what uses will occupy the ground floor. B1c, B2, B8 and D1 are not interchangeable and the use should be defined before the design is developed further. It offers no proper servicing access and no yard space. The glazed curtain wall treatment would not be appropriate for certain uses. Concerned at the division into 2 commercial spaces. The rear commercial space doesn't work well as it has little street presence or legibility
- Concerns at the overall amount of amenity space and its usability; that the amenity space at high level is broken down into several smaller terraces. Given there will be up to 50 children in this development, the Applicant should seriously consider how high quality play can be incorporated at ground floor level.
- The applicants should engage with the neighbours to the South to see if there is any opportunity to develop a strategy for shared public spaces between the two developments
- The Panel stated that the internal layout creates long corridors which do not have a lot of natural light.
- Angled balcony on the North-East corner on Floors 1-3. are quite deep and may affect the quality of light to adjoining units.
- The Panel are encouraged to see a 100% affordable development. However noted there is a risk of creating a social housing enclave, potential to provide some different tenures in order to create mixed and balance communities.

5.3 Officer's noted the Panel's comments relating to the height of the building and the position of the footprint within the site. The scheme has had further revision since Place Review Panel, with the key changes as follows:

- The applicants have provided more detail in terms of the ground floor, its condition, with playspace at ground floor level forming communal amenity and consolidated within public realm
- The prominent corner to the south has been made focal entrance point to the scheme to strengthen the design.
- The internal ground floor level has been changed with the commercial floorspace merged to form a single commercial unit with servicing and back of house access.
- Residential entrance and building approach enhanced to create strong sense of arrival
- A 50% affordable homes offer (70/30 tenure split) is now proposed (the tenure mix is yet to be confirmed).

6. SUMMARY OF MATTERS FOR CONSIDERATION

Land Use

- 6.1 In terms of the existing use, the site consists of a mixture of small A1 (shop) and B8 (storage or distribution) providing 1,059sqm total floorspace with only 4 employees. In relation to employment use the site is identified as falling within a Tier 4 (scattered employment sites) industrial location, which provides protection for industrial and warehousing activities. Policy SP3.2 of the Croydon Local Plan 2018 identifies the preferred approach in order to safeguard this protection. This includes a number of preferred policy uses for this site B1c, B2, B8 and D1 uses.
- 6.2 The applicants have provided an independent marketing assessment which identifies a large section of the existing commercial unit as in poor condition with low employment. The proposal would involve a reduction in employment floorspace associated with this site from 1059sqm to 356sqm. However the proposal would provide a flexible marketable commercial unit with the capacity to provide 12 employees (70% increase compared to the actual number of employees at present). The applicants have stated that the commercial element would comprise of the permitted uses as detailed in the Local Plan. The applicants have not however identified which of uses would be introduced or the full measures to be introduced to ensure adaptability of the unit. In addition to the fit out of the commercial element the applicants would need to demonstrate that the residential element or neighbouring amenity would not be harmed by the commercial activity. Furthermore the proposal would need to demonstrate that any replacement commercial activity on this site would provide a viable option in this location through securing marketing and fitting out for an end user through 106 agreement. Officers are broadly supportive of the principle of re-provision at this quantum subject to suitable demonstration of the above to ensure that the space provides a marketable and more useable space for future occupiers than the current building.
- 6.3 The London Plan sets a minimum ten year target for the borough of 14,348 new homes over the period of 2015-2025. The Croydon Local Plan (2018) sets a minimum twenty year target of 32,890 homes over the period of 2016 to 2036.

The proposed development would create additional residential units that would make a significant contribution to the borough achieving its housing targets as set out in the London Plan (2016) and Croydon Local Plan (2018).

- 6.4 The Draft London Plan is nearing adoption, the Mayor of London in his 'Intend to Publish London Plan 2019' sets a 10 year target for Croydon of 20,790 homes. The Draft London Plan Policy H1 states that boroughs should optimise the potential for housing delivery on sites with high PTAL (3 to 6).
- 6.5 The site has a high PTAL (5), good access to public transport, local shops and services and is well placed for high density residential-led development. -

Affordable Housing

- 6.6 Policies SP2.4 and 2.5 of the Croydon Local Plan (2018) set out that a minimum of 50% of units must be secured as affordable housing on sites of ten or more homes. Policy seeks a 60:40 tenure split between affordable rented homes and intermediate (including starter) homes, unless there is agreement between Croydon Council and Registered Provider that a different tenure split is justified. The split seeks to provide a range of housing types to help ensure the creation of mixed and balanced communities.
- 6.7 During pre-application discussions the applicant has suggested that the site would be delivered as 100% affordable rented scheme. However, the applicants have revised their submission and are currently proposing to provide 50% affordable housing scheme 70:30 tenure split between affordable rented and intermediate homes as they do not have a registered provider onboard yet. To date no viability information has been provided however the applicant has stated that the proposal will exceed the minimum affordable housing level set by the GLA and the draft London Plan. However as the proposal would not be a policy compliant scheme the local authority would require viability testing to support this approach. The applicant has stated that the tenure split will be agreed with the planning department with officers expecting further details on this point accordingly.

Unit Mix

- 6.8 Policy SP2.7 sets a strategic target of 30% of all new homes up to 2036 to have three beds or more. SP2.5 states the Council will seek to ensure that a choice of homes is available in the borough which will address the borough's need for homes of different sizes. Policy DM1 of the Croydon Local Plan (2018) requires developments located within an Urban Area with PTAL 4/5 to provide 40% of the units as three bedroom or larger. Policy DM1 does outline some exceptions where this quantum of larger units would not be sought. These exceptions are as follows:
 - a) Where there is agreement with the associated affordable housing provider that three or more bedroomed dwellings are neither viable nor needed as part of the affordable housing element or any proposal, or

- b) Within three years of the adoption of the plan, where a viability assessment demonstrated that larger homes would not be viable, an element may be substituted by two bedroom, four person unit comply with the floor space specifications of national Technical Standards or the London Mayor's Housing SPG or equivalent.

At present 23% (14 homes) would be three beds, and 18% (11 homes) would be two bed four person. The proposal would be policy compliant if one of the exceptions outlined in the policy above are met. As the applicants are unlikely to meet point b) the applicants would need to demonstrate point a and have an affordable housing provider on board. Officers would encourage the applicant to engage with Registered Housing Providers before submitting a Planning Application

Quality of Residential Units

- 6.9 All of the proposed residential units have been designed to meet minimum floorspace and private amenity spaces standards set out by the National Housing Space Standards. The proposal provides a communal spaces/with child playspace opportunities at ground floor, third floor, seventh floor and ninth floor levels. At this stage, although 50% of the units are stated to provide affordable housing, no clarification has been provided in regards to the final tenures and therefore the overall amount of child playspace cannot be confirmed. The applicants have indicated that the level of external playspace available would be compliant with Policy DM10.4d of CLP2018. However confirmation would need to be undertaken.
- 6.10 The Mayor of London Housing SPG advises that developments should minimise the number of single aspect dwellings, and that north facing units should be avoided. North facing is defined as having an orientation less than 45 degrees either side of north (i.e. between north west and north east). There are no north facing single aspect units and the majority of units are dual aspect (stated to be 71% as currently designed). There are some exceptions, most notably the middle units of the Block at first to third floor level. Where there are single aspect units the outlook from these will face south across gardens and neighbouring car park.
- 6.11 To date, only indicative sunlight and daylight data has been provided for the residential units with a brief statement detailing that with the appropriate scaled fenestration all units could meet the BRE standards with acceptable impact on neighbouring properties. At this stage officers consider that the massing of the development cannot be fully agreed until this has been provided.
- 6.12 Further details and reassurances will also need to be provided as to the quality of remaining residential units at first to third floor level being located so close to the neighbouring boundary. The applicant needs to demonstrate that these neighbouring occupiers' amenities will be protected whilst ensuring that future occupiers have good levels of outlook.
- 6.13 In terms of privacy window openings the block would be between 10m to 41m from neighbouring properties in line with the guidance set out by the Suburban

Design Guide for relationships between buildings. Further details are required to fully demonstrate this relationship, in-line with the proposed massing and height for the scheme.

- 6.14 The site is notably in close proximity to a busy road junction and therefore officers would require that a noise and air quality assessments be undertaken. The ground floor and external communal playspace at third, seventh and ninth floor levels includes landscaping however the full details and use of these areas still need further examining, including the quality and future maintenance of these areas.
- 6.15 The sense of arrival to the building has been identified as being important. The applicant has created a more informed front entrance to the residential accommodation with internal access for potential occupiers to the communal bin, bulk and cycle storage areas but still needs further design resolution.
- 6.16 In regards to accessibility, London Plan Policy 3.8 requires 90% of dwellings to meet M4(2) 'accessible and adaptable dwellings' Building Regulations requirement, with the remaining 10% required to meet M4(3) 'wheelchair user dwellings'. It is understood that the development would comply with these policy requirements, but it is unclear at what mix in terms of bedroom types and tenure.

Quality of commercial unit

- 6.17 The proposal would provide an adaptable single commercial floorspace unit. It is thought that the commercial unit would meet BREEAM "excellent" standard, however no details have been provided and this would need to be demonstrated as part of an application and secured by condition. The sense of arrival has been identified as crucial element to the commercial unit and this require further study. The proposal includes visitor cycle racks and front approach details of which would need to be provided. The introduction of a double height, fully glazed ground floor would create a modern working environment with lots of light and allow visual permeability and activation at this level. Details of ventilation and extracts would need to be considered in respect to building design and neighbouring amenity. The applicants have provided areas for commercial cycle and refuse storage. The proposal has been further modified to introduce a back of house entrance for escape purposes and possible servicing. The proposal has also indicated that the rear triangular external area be dedicated to the commercial activity which would be useful in a variety of ways for the number of uses proposed however the extent of access to this area current only external along the south of the building and this would need further examination in terms of use ability and further maintenance.

Height, Bulk and Design

Policy Principle of Height

6.18 Croydon Local Plan (2018) Policies SP4, DM15 and Place Policy DM36: Broad Green are the most relevant policies for considering the principle of a tall building within this location. These policies will be analysed in turn below:

SP 4.5 states:

“Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in District Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan’s Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.”

6.19 The site is not within the Croydon Opportunity Area, and lies (just) outside the Broad Green local centre 106m from the District Centre. However it is well connected to public transport interchanges with West Croydon Station 870m at its furthest point from the site, which provides quick convenient connections into the Croydon Opportunity Area, Croydon Metropolitan Centre and other district Centres. The proposal as such does not conflict with the requirements of SP 4.5.

SP 4.6 states:

“Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for tall buildings will be required to:

- a. Respect and enhance local character and heritage assets;*
- b. Minimise the environmental impacts and respond sensitively to topography;*
- c. Make a positive contribution to the skyline and image of Croydon; and*
- d. Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area”*

6.20 The above criteria will be considered in further depth within the rest of this report. The proposal for a tall building was subject to detailed townscape analysis in this location were it was considered that the right scheme could meet the requirements of the policy.

Policy DM15 states:

To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:

- a. They are located in areas identified for such buildings in Policies DM34 to DM49;*
- b. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;*

c. The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;

d. The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;

e. To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and

f. To ensure tall and large buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm.

The relevant part of Policy DM36: Broad Green and states:

DM36.4 In the area north of Broad Green Local Centre, to ensure that proposals enhance and strengthen the character of the area north of the Broad Green Local Centre, and facilitate growth, developments should:

a. Retain and create glimpses and separation distances between buildings in order to improve the openness of London Road;

b. Incorporate main pedestrian entrances onto London Road;

c. Complement the existing predominant building heights of 3 storeys up to a maximum of 8 storeys; and

d. Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large and tall buildings.

6.21 The applicants have identified the adjoining site at Dartmouth House (9-storeys) and the close proximity of residential buildings 8- 14 storeys high along London Road as landmarks referencing tall buildings in the immediate locality.

6.22 Given that the block is over 8 stories, the development is likely to be considered a departure from Croydon Local Plan (2018). A Local Planning Authority may depart from development plan policy where material considerations indicate that the plan should not be followed, subject to any conditions prescribed by direction by the Secretary of State. The power to depart is set out in Article 32 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

6.23 It is important that the Croydon Local Plan is read as a whole, and that failure to comply with a single policy within the plan would not necessarily lead to a sustainable reason for refusal. In order to justify the departure the council will need to be satisfied that the development is able to demonstrate clear benefits that actively and incomprehensively outweigh the areas of non-compliance.

6.24 It should be noted that the policy requires development to complement the existing building heights, rather than it must be 3 to 8 storey height. It could be argued that whilst the development is taller than the 8 storey height, it would still

be complementary to the site and surrounding, and would therefore be within the spirit of the policy parameters set out.

- 6.25 The proposal was initially presented as a scheme which provided 100% affordable housing. The provision of a fully affordable housing proposal was significant benefit for this location. The Place Review Panel also welcomed a scheme with 100% affordable housing and even suggested the building increase slightly taller at the southern point. The building form and the extent of development was presented as achieving this level of development. Officers are of the opinion that a tall building proposed within this corner location will need to be carefully considered. Policy DM36 identifies that the edge of the Broad Green Local Centre is eroding and is beginning to lose its separate identity and sense of place. This could lead to the Local Centre being amalgamated into the homogenous urban form of the London Road. The applicants provided a VuCity model exercise to demonstrate that the proposal would have limited impact visually from a number of approaches. However, despite various reiterations, concerns still exist of extent of tall building and its height on what is a constrained site. Officers are of the opinion that any height proposed within this location will need to be carefully considered alongside other material considerations and public benefits. This includes the extent to which it would provide a high quality residential environment, workspace, public realm and landscaping

Townscape Impact of Height and Massing

- 6.26 As highlighted above, the applicants use of VuCity demonstrated the limited views of the building from the Local Centre. However the building will be visible for large part along residential streets Bensham Road and along Elmwood Road when approaching the centre. Officers are in support with the proposed distribution of height stepping up the site (with the highest element facing London Road). However consideration is needed as to whether the proposed massing respond appropriately with the 'terraced' massing along the north and the broader townscape character. A tall building on this site must be of an exceptional quality which respects and enhances the local character of the area by successfully mediating between London Road and the urban character found north of the site. In order to justify the height and massing in its townscape context consideration must be given to what role does the development play in the broader context. How would the development enhance existing streetscene, local character and legibility of the town centre.

Heritage

- 6.27 There are no notable heritage assets near to the development: the nearest being The Grade II Listed Church on the corner of Campbell Road and London Road 300m to the west.
- 6.28 The proposed massing has been tested from this points. Officers consider that the height, massing and bulk of the building would not have any impact from this point.

Layout/Form

6.29 The proposed layout and form of development has evolved through the pre-application process, by having the building set back from the front boundary line for more than two thirds of the building length to introduce an improved public realm opening up the site from the north. Contrary to the Place Review Panel views on this, which encouraged continuing the building line along the entire street frontage, officers are overall supportive of the set back approach subject to architectural detailing as it allows for improved connectivity between the site and the public realm. The layout would introduce disabled parking bays, communal area and back of house servicing which if sensitively designed would provide an invaluable softening of the development at this point. This would be further enhanced by a tree line highway improvements along Bensham Lane. However to date no further investigations have been made to establish if the tree line planting on the highway would be possible. The building form would enable the residential entrance to be formed along the point where the rest of the building adjoins the pavement along Bensham Lane, turning and reflecting the bend in the road. The proposal would involve removal of redundant crossovers and reinstate the pavement along this side of the road. The commercial element re-enforcing an active frontage for the rest of building towards the southern tip of the site.

Elevational Treatments and Character

6.30 The proposed building has retained the mix of horizontal vernacular with verticality throughout its various forms. The applicant has begun to develop the elevational treatment. The latest revisions is an assertive design approach which is generally welcomed, however this does not eclipse the need for a contextual design approach and a high quality design. Officers are strongly of the opinion that the proposal needs to bolster its response to local character. As a priority, the applicant needs to look at and interpret specifics of the immediate context, indications of entrances, window fenestration, landscaping; to reflect the rich Broad Green context and so inform the detailed design decisions. Officers are not convinced that the current approach is working as the building would appear very urban, and would not achieve sufficient mediation between London Road 'urban' and Bensham Lane 'suburban' conditions. In it's current design build elevations are particularly generic, and lack context.

6.31 The proposed cool colour palate is not currently supported. Blue glazed brick, in particular reads as non-residential and could be quite harsh and unwelcoming, particularly in tandem with the strong grid façade fenestration. Details of suitable precedent images of proposed material selection working elsewhere would need to be provided. Further consideration is required to demonstrate how the building is read from the street, such as materials on the underside of balconies.

6.32 The applicant would need to demonstrate how the building façade at ground floor level can improve the streetscene and provide interest and activity through material detailing such as brick rather than relying on a walled landscape which

would require extensive ongoing maintenance. Further comments on are included in Landscaping below.

- 6.33 Officers are of the opinion that to create a high quality scheme which responds to the local character and to justify support for a taller element significantly beyond the height identified within the place specific policy, the applicant should reconsider the building façade ‘top, middle and base’ banding, with consideration given to a different colour brick on the base level or that the glazed bricks are used to emphasis the ground floor only. Officers also feel that there is need to reappraise both the entrance to the residential and commercial premises and how they differ as part of the overall façade approach. Consideration should be given to how the two key entrances are celebrated and emphasised for optimum legibility, accessibility and safety in line with the principles of secure by design.

PROPOSED SCHEME
APPROACH TO MATERIALITY



Fig. 8: Proposed materiality along west/north elevation

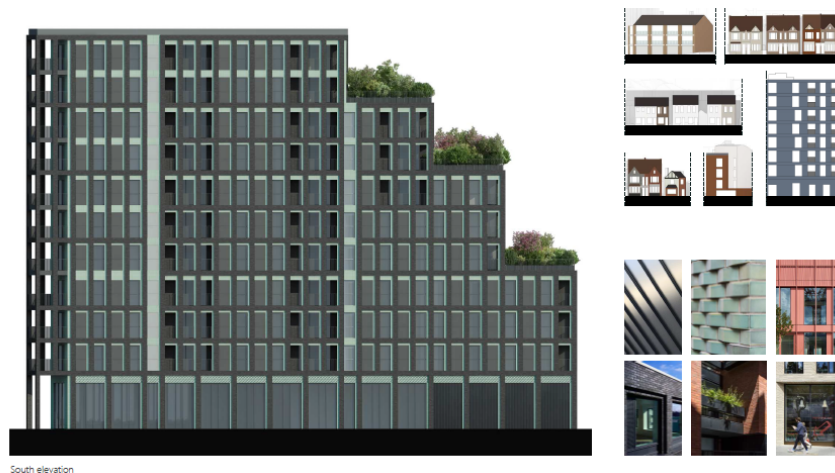


Fig. 9: Materiality along south elevation

Ground Floor Activation, Legibility, transparency

6.34 A large area of the ground floor of the development is required to accommodate a number of functional uses, for both commercial and residential such as bin and cycle stores, communal space in addition to the commercial activity itself. This does provide a challenge in terms of street frontage activation. The unusual triangular shape of the site means that a significant area at ground floor level to the north east corner would not be immediately visible or legible. However to the south the commercial unit would provide transparency and transpose the internal activity externally at this point. Officers have yet to be convinced if more could not be made of the entrances to both the residential and commercial access, however details are required to show that the proposed site entrances are activated, legible and welcoming for future occupiers. Due to the combination of the staircase, bin stores and bike stores a large extent of the building at ground floor level would lack transparency towards the active areas outside. Detail is required to show natural surveillance of these areas would be possible

Landscaping, Public Realm & Outdoor Amenity Space

6.35 The applicant has developed an urban approach to their landscaping scheme, to improve the public realm to the north with communal areas and providing outdoor amenity on three different levels stepping the building. While at ground floor level the set back of the building at this point is welcomed, the area competes with providing four disabled parking spaces, informal communal area in addition to access path for bin and bike storage and back of house access. This has created disjointed communal areas that do not effectively tie together, in addition to a further triangular area to the rear of the building. The landscaped approach while effective in terms of seating, perennials, pavers and natural play features raises question on how useable these areas would be with only access directly from the front entrance or around the building to the south to the triangular area at the rear. SUDS appear to be beginning to be integrated into the design at the front of the site which is welcomed but clarification is required around how these work within the proposed site wider drainage strategy.

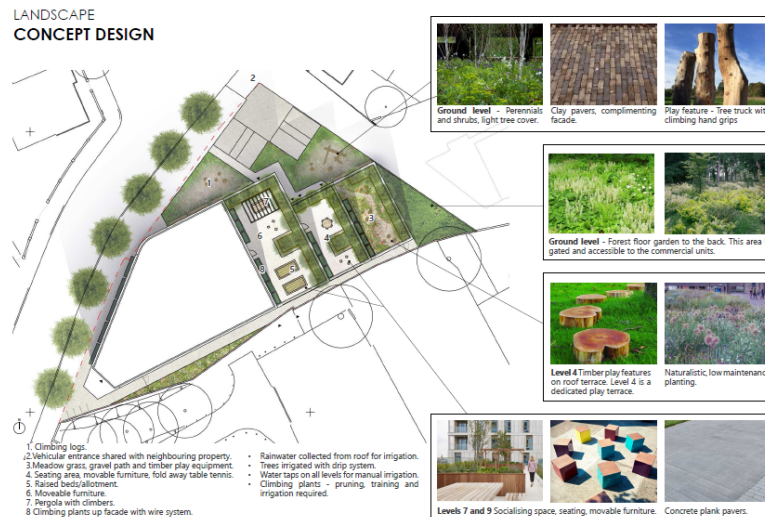


Fig. 10: Landscapng

6.36 On the upper levels the landscaping approach to the communal areas has developed well, with encouraging introduction of green roof areas to provide improved drainage strategies, timber play features, movable furniture socialising areas, low maintenance planting. The overall level of external playspace has yet to be finalised but based on a policy compliant scheme of 50% affordable housing the level of amenity space would appear appropriate.

Impact on Neighbouring Properties Living Conditions

6.37 One of the critical considerations for this site is the impact of the development on living conditions of existing and potential neighbouring properties. In terms of existing residential properties, the most sensitive are occupiers in Dartmouth House to the south, the 20 new flats currently being constructed to the north and the terrace houses along Bensham Lane.

6.38 A brief assessment of daylight and sunlight giving distances and demonstrating orientation has been provided which indicates that there would not be any significant adverse impact for these occupiers. However the applicant will need to demonstrate that this proposed relationship as well as with all other surrounding occupiers would continue to protect the amenities of the adjoining occupiers to an acceptable degree.

Privacy, Outlook and Sense of Enclosure

6.39 The separation distance between Dartmouth House to the south and the proposed building is approximately 15 metres at its nearest point. However, owing to the shape of the Dartmouth House which is at 170 degrees to the block, it would appear that none of the primary habitable room windows face towards the site. A similar distance exists towards the rear two storey residential house of 20 Bensham Lane and the lower four storey section of the building to the north. Further details would be required to demonstrate that the proposed flats at first

floor to third floor level would not overlook this neighbouring site and that these neighbouring properties retain acceptable outlook. The four storey section would follow the building line of the part two/three storey residential flats currently being built to the east 10m away. The outlook of these properties face north and south; therefore officers are satisfied would not unduly impact on the outlook for these occupiers. The remaining neighbouring surrounding properties including those opposite have been identified as being at reasonable distances away, so as the development would not result in a harmful impact in terms of privacy, outlook or sense of enclosure.

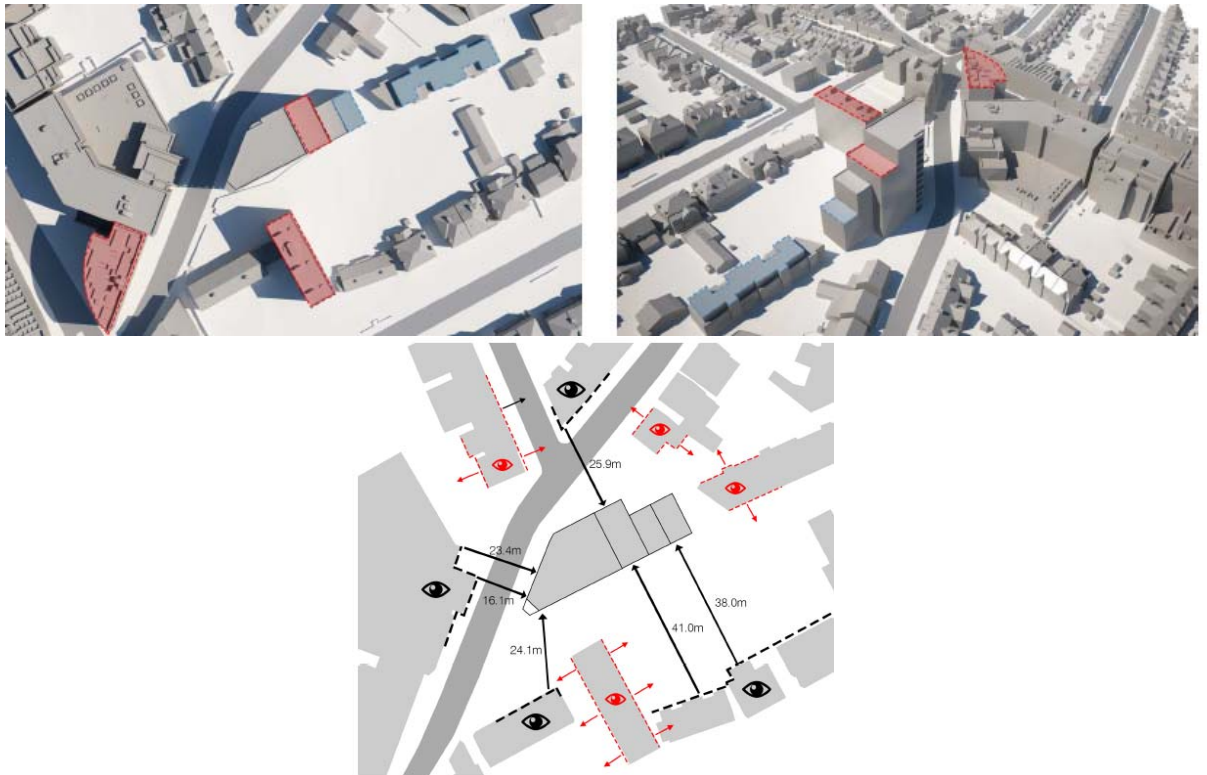


Fig. 11: Building position (top left), Massing (top right), Distance study (below)

Highways and Parking

- 6.40 The site is located on Bensham Lane 66m from London Road (A235), for which TfL are the highways authority.
- 6.41 Given the high PTAL rating, the provision of an otherwise car free development is deemed acceptable. Residents will not be entitled to parking permits (secured through a s106 agreement) and the applicant would be expected to provide a car club space (as shown on the plans) as well as contribute to a number of other sustainable travel initiatives (including sustainable transport contributions to be secured through s106 agreement). The proposal includes cycle storage to be

line with London Plan requirements. TfL have confirmed that they are broadly supportive of this approach.

6.42 Given the characteristics of Bensham Lane, and also to ensure that healthy streets and public benefits of the scheme are delivered, notably the commercial unit at the southern tip of the site, a practical servicing strategy will be essential to demonstrate that the commercial unit can be serviced from Bensham Lane. The development includes refuse storage within suitable distance with separate arrangement for collection of commercial refuse bins. The proposal would reinstate the redundant crossovers and adapt the existing vehicle entrance point to the north to enable access for the 4 spaces. Officers are satisfied with this arrangement subject to detailing. The creation of the tree line front along the public highway would need further investigation to demonstrate that it is deliverable (and services within the footway do not prevent tree planting). The proposal would need to adapt the current single yellow line to a double yellow line immediately outside the premises. Officers also consider that a change in the current parking restrictions times would be required for which there would be a need for public consultation and officers would seek to secure funding for this as part of a s106 agreement.

6.43 A Construction Logistic Plan, delivery and servicing plan and travel plan would all be expected to be submitted in draft form upon application, considering the strategic importance of the road network surrounding the site.

Trees/Biodiversity

6.44 There are no trees on this site. The applicant is proposing to introduce a row of street trees along the front of the site on Bensham Lane. Officers welcome this approach but further intensive investigation is required to demonstrate that this would be possible. A variety of biodiverse measures have been suggested for the communal roof spaces details of which would need further examining. The scheme would be expected to meet the GLA's urban greening factor requirements. The building would be constructed close to neighbouring trees along the southern boundary of the site and therefore details of protection measures to these neighbouring trees would be required.

Planning Obligations

6.45 At this stage it is envisaged that planning obligations will be required to mitigate the impacts of the development. Discussions are forthcoming in relation to the heads of terms, but it is anticipated that these would include the following:

- Affordable housing (on site)
- Affordable housing review mechanisms (early and late stage)
- Employment and Training strategy and contribution (construction)
- Air Quality
- Zero carbon off-set
- Securing potential links to district heating
- Car club (provision and membership)
- Travel Plan

- Car permit restrictions
- Public Realm improvements and maintenance
- Sustainable travel contributions
- Highway works and public realm improvements

7 SPECIFIC FEEDBACK REQUESTED

7.1 In view of the above, it is suggested Members focus on the following issues:

- i. The principle of a high density residential development in this location.
- ii. The height and bulk of the development, especially in the context of the Broad Green place-specific policy, and whether the development can deliver sufficient benefits to justify a departure from policy.
- iii. Whether the proposed design direction and elevational materiality treatment is an appropriate response to its context.
- iv. The emerging landscape design and the public realm space at the northern end of the site.
- v. The level of affordable housing and whether an alternative mix to deliver 50% is acceptable.
- vi. The likely impact on neighbouring living conditions
- vii. Whether a car free development, with disabled parking provision, car club only for the residential component, is acceptable given the PTAL location.