



**Housing, Planning & Regeneration**  
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Our ref: PREAPP/22/00115

Sophie Cattlin  
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York Place  
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4<sup>th</sup> January 2023

BY EMAIL

Dear Ms Cattlin,

**Residential development comprising apartments and townhouses at 7 – 15  
Oakfield Road, Penge, London, SE20 8QA.**

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I refer to your follow-up pre-application submissions and our meeting of 11<sup>th</sup> October 2022.

In attendance on behalf of London Borough of Bromley were:

Agnieszka Nowak-John – Planning Officer  
Ben Terry – Urban Design Officer

The submitted plans and documents for consideration are as follows:

- Site Plan;
- Apartment Building Plans and Elevations;
- Vision Document by S+SA Architects dated August 2022;
- Cover Letter by Northern Planners dated 13<sup>th</sup> April 2022.

### **Location**

The site is located at the corner of Oakfield Road and Cambridge Grove, and between Safestore Self Storage to the south-west and Oaks Park Medical Centre and residential properties of Rosewell Close to the north-east. It extends to approximately 0.26 hectares and is currently vacant.

The London Overground railway line lies to the north-west of the site. The site is located in Flood Zone 1 and has a PTAL rating of 3.

The site falls within Crystal Palace Penge and Anerley Renewal Area and adjoins the Locally Significant Industrial Site (LSIS).

### **Proposal**

The proposed development would comprise:

- 22 flats (a mixture of 1 and 2 beds) in a three storey, L shaped apartment block fronting Oakfield Road; and
- 6 two storeys 3-bed terraced houses.

Indicative layout provided shows the provision of 40 off-street car parking spaces.

### **Planning History**

DC/12/02307/FULL1 – Construction of detached building to accommodate church and meeting hall (Class D1) with 44 car parking spaces to rear and new vehicular access from Cambridge Road' under application reference. Approved in November 2012.

PREAPP/21/00318 – Residential development comprising apartments and townhouses. Officers considered that subject to the potential impact on the adjoining LSIS, there is no in principle objection to the proposed residential development of the site from a land use perspective. A number of points have also been made particularly including the layout and form of the proposal.

### **Policy Context**

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan for this proposal includes the Bromley Local Plan (2019) and the London Plan (March 2021).

Current Policies relevant to this application include:

#### **Bromley Local Plan (2019)**

- 1 Housing Supply
- 2 Affordable Housing
- 4 Housing Design
- 8 Side Space
- 13 Renewal Areas
- 15 Crystal Palace, Penge and Anerley Renewal Area
- 30 Parking
- 32 Road Safety
- 33 Access for All
- 37 General Design of Development
- 48 Skyline
- 70 Wildlife Features
- 72 Protected Species

- 77 Landscape Quality and Character
- 79 Biodiversity and Access to Nature
- 82 Locally Significant Industrial Sites (LSIS)
- 113 Waste Management in New Development
- 116 Sustainable Urban Drainage Systems
- 119 Noise Pollution
- 120 Air Quality
- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon reduction, decentralised energy networks and renewable energy
- 125 Delivery and Implementation of the Local Plan

London Borough Bromley Supplementary Planning Documents (SPDs):

Affordable Housing  
Planning Obligations

**London Plan (March 2021)**

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D2 Delivering good design
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D11 Safety, securing and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H4 Delivery affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H10 Housing size mix
- S4 Play and informal recreation
- E7 Industrial intensification, co-location and substitution
- HC3 Strategic and Local Views
- G5 Urban greening
- G6 Biodiversity and access to nature
- SI1 Improving Air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure

- SI 8 Waste capacity and net waste self-sufficiency
- SI 13 Sustainable drainage
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Accessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- DF1 Delivery of the plan and planning obligations
- M1 Monitoring

The relevant London Plan SPGs are:

Providing for Children and Young People's Play and Informal Recreation (2012)  
Accessible London: Achieving an Inclusive Environment (2014)  
Sustainable Design and Construction (2014)  
Shaping Neighbourhoods: Character and Context (2014)  
Control of Dust and Emissions During Construction and Demolition (2014)  
Housing (2016)  
Homes for Londoners - Affordable Housing and Viability (2017)

**Key Planning Considerations**

**Land Use**

Oakfield Road LSIS

The site is located adjacent to the Oakfield Road Locally Significant Industrial Location (LSIS).

Whilst the LSIS is not directly affected and Local Plan Policy 82 does not strictly apply, there may be indirect impacts resulting from the introduction of residential development adjacent to the LSIS.

Policy E7 of the London Plan outlines that intensification and lo-location should not impact on the LSIS in terms of access, servicing and operational hours. This issue should therefore be taken into consideration as Oakfield Road is used by all traffic accessing the LSIS and Cambridge Grove is used by the warehousing/storage use adjacent to the site.

Officers have previously advised that consideration needs to be given to the potential impact the introduction of the residential accommodation might have on the adjacent LSIS.

The cover letter outlines that the proposal has been revised to have one single access from Cambridge Road. This is likely to be an improvement on the significant number of parking previously proposed and reduce conflict on Cambridge Road itself.

In terms of compatibility with the neighbouring LSIS, the applicant has outlined the opening hours of Safestore and Wickes, but not explained why these hours would avoid any conflict. These hours may change over time and with different occupiers, so they should not be used solely to justify a compatible relationship between uses.

The other aspects of our previous comments have also not been addressed, including other operational and servicing requirements alongside access. It is not clear whether the current LSIS occupiers have been consulted on the proposal, but this would be useful to understand any conflicts.

It is also worth bearing the Agent of Change policy in mind (London Plan Policy D13) which puts the responsibility of nuisance mitigation on the new noise-sensitive development, in this case the new housing scheme. Part B outlines that 'Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.'

### Housing

Please refer to comments made previously in the later dated 10<sup>th</sup> February 2022.

The applicant is advised to consider the viability implications of the proposal early in the design development process to ensure the aspirations of the scheme are financially sound and deliverable.

The proposed housing mix is considered acceptable.

### **Design matters**

#### Design approach

Officers acknowledge and welcome the applicant's response to previous design comments. The (draft) Design and Access statement illustrates clear design thinking and a decision-making process which reflects site conditions and design requirements for new homes, as set out in the London Plan (design-led approach) and Local Plan.

#### Scale, massing, and appearance

Building heights for the proposed villa and terrace block appear consistent with the prevailing height of surrounding buildings, particularly along Oakfield Road.

Confirmation of proposed and surrounding building heights (eaves and ridgelines) are required for a detailed design assessment and should form part of the application for planning permission. Elevation drawings should illustrate the wider street scene, showing the proposed villa block in context with surrounding buildings (inc. the storage unit). Visualisations to illustrate the scale and massing in the surrounding context and a section through the application site (to Cambridge Grove) will add value to the future submission.

The initial approach to scale, massing and appearance is supported in design terms. The applicant is encouraged to bring together the precedent and material study and form a strong architectural strategy to integrate the building/s within the street scene. Architectural details to soften the parapet (corner/edges) will improve the relationship between the villa block and neighbouring building.

### Layout

Officers acknowledge and welcome the revised siting and position of the proposed villa block. The block is set back from the neighbouring building (Oakfield Surgery), behind the building line of its projecting gable. The amount of 'set back' and setting for the villa block, including the interface between public and private spaces (boundary/landscape treatment) remain important considerations. The applicant should continue to develop the design at street level to ensure the building fits comfortably within the street scene.

The revised layout reverts to one access point off Cambridge Grove. This arrangement will reduce the visual dominance of highway infrastructure and limit vehicular speeds/movements within the application site. Reducing design speeds at the junction (Cambridge Grove) through smaller corner dimensions (i.e. radii) should be explored with LBB's Highway Officers. A simple junction design is expected. High-quality surface materials, boundary treatments and landscape planting will improve the threshold from the street into the application site.

In terms of residential experience and quality of place, the proximity of the proposed residential use to an existing B8 use remains a significant concern. Officers acknowledge the applicant's intention to provide a new 'landscape buffer' along Cambridge Grove – to mitigate that impact. However, there may be insufficient room within the application site to provide an adequate buffer (between the site and neighbouring industrial use).

Improvements to Cambridge Grove would provide an opportunity to increase the landscape provision (buffer) through street trees (and potentially rain gardens), whilst improving the arrival space/experience and setting for the proposed residential use. Officers would encourage the applicant to negotiate details of improvements to Cambridge Grove (including tree planting) with LBB's Highway Officer and Street Tree Officer, who support the principle of such works.

The location of the bin store (for the apartment block) and refuse collection points for the terrace block will also need careful consideration. Full details for the northern boundary (interface and threshold) should be provided with an application for planning permission.

It remains unclear whether the site can accommodate the amount of proposed development. Particularly, whether the applicant can provide adequate high-quality amenity space, services and parking within the application site (based on the expected number of new residents). Given the amount of development and the limited space available, the external spaces would need to be designed and managed to a very high standard. Officers recommend further design work to refine the layout and building design, taking into account the above considerations.

Officers would draw the applicant's attention to the London Plan's inclusive design (D5) and public realm (D8) requirements; and housing quality and standards (D6). Incorporating appropriate elements of green infrastructure and sustainable design will add value to the design.

### **Residential standards**

Please refer to comments made previously in the later dated 10<sup>th</sup> February 2022.

The indicative floor plans submitted appear to show no defensible space outside of the ground floor windows and balconies, meaning there is no deterrent for someone to walk up to residents' windows or doors. This is particularly concerning in relation to the vulnerable accessible units. Careful consideration should therefore be given to the treatment of public and private space thresholds, i.e. provision of defensible planting, buffers, screening etc.

No information is provided in relation to unit tenure that is required to assess the amount of playspace required using the GLA calculator and there are no details of proposed play-space at this stage.

### **Agent of Change**

Given the potential impacts, Policy D13 should be a significant consideration when formulating the scheme's design. This policy states that developments should employ good design and explore mitigation measures early in the design stage to ensure that established noise and nuisance-generating uses remain viable and without unreasonable restrictions.

### **Impact on Residential Amenity**

Please refer to comments made previously in the later dated 10<sup>th</sup> February 2022.

### **Transport and Highways**

The development is on corner of Oakfield Rod and Cambridge Grove also, is in an area with PTAL rate of 3 on a scale of 0 – 6b, where 6b is the most accessible.

The vehicular access is from Cambridge Grove leading to the car parking area. This is acceptable in principle. The new access road will not be adopted. Also, the visibility splays must be provided as part of the full submission.

40 car parking spaces are shown on the layout plan which is in excess of the maximum standards set out in the London Plan. Policy T6 Car Parking in the London Plan advocates that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

The parking standards set out in the London Plan (table 10.3) state that in outer London areas with a PTAL of 2-3 a maximum of 0.75 spaces should be provided for 1-2 bed units and a maximum of 1 space per unit should be provided for units of 3+ bedrooms.

The policy also sets out requirements for EV charging and disabled parking, which the applicant should provide.

In terms of the cycle parking provision, London Plan Policy T5 states that 1 long-term stay (residents) space should be provided for 1 bedroom dwellings and 2 cycle spaces provided for dwellings with more than 1 bedroom. For short-term stay (visitors), if the development is between 5-40 dwellings, 2 spaces should be provided, thereafter 1 space per 40 dwellings.

The proposed scheme must also include adequate provision for waste and recycling - the apartments bin store shown on the proposed site layout plan appears too small for 22 residential apartments.

The bins should be easily accessible for collection and be located no more than 18 metres of the nearest accessible point for the refuse vehicle and should be provided with a path not less than 1.4 metres wide, free of steps, kerbs and ramps with an appropriate hardwearing surface, with a gradient not steeper than 5% (1 in 20).

Storage areas should be designed to accommodate the wheeled bins 'side by side' and not 'end to end'. Allowance should also be made for opening of the lid, as this will enable residents to access all containers without having to wheel them out of the storage area. Details of screening/enclosure should be provided with the application.

### Transport Assessment

A Transport Assessment (TA) should be provided at planning application stage, in line with the Mayor's Vision Zero approach and Healthy Streets guidance. This should include as follows:

- Existing Situation -Baseline data
- Proposed Development, Site Access Arrangement, Car parking and Cycle parking
- Study Area and Existing Traffic Conditions
- Active Travel Zone Assessment (ATZ)
- Traffic Generation analysis- (realistic figures are required)
- Servicing- A detailed Delivery and Servicing Plan (DSP)
- Traffic Assessment Scenarios (depending on car parking level)
- Highway Safety/ accident records
- Construction management plan framework
- Mitigation/ Travel Plan/ provision of Car Club

### **Biodiversity/Green Infrastructure**

The current proposal introduces more landscaping and planting along the site's boundaries which is welcome. Please refer to comments made previously in the letter dated 10<sup>th</sup> February 2022.

Where living/green roofs are proposed, specifically designed and locally appropriate biodiverse living roof systems should be favoured, and the use of homogenous mat-based living roof products should be resisted. In order to demonstrate this the following details should be provided:

- fully detailed plans (to scale) showing and stating the area of the living roof. This should include any contoured information depicting the extensive substrate build up and details of how the roof has been designed to accommodate any plant, management arrangements, and any proposed photovoltaic panels and fixings.
- a scaled section through the actual roof (i.e. not a generic section of a living roof) showing the details of the extensive substrate base and living roof components.
- details of the proposed plug planting and seed composition and planting methodology.
- a statement outlining a management strategy detailing how the living roof would be maintained and monitored for a period of at least 5 years post installation.

Please visit [Livingroofs.org](http://Livingroofs.org), the leading UK green roof website for further guidance.

### **Validation Requirements**

I would draw your attention the Council's published Local Information Requirements document. The adopted document can be viewed on the Council's website and sets out material that will be considered essential to accompany your application.

At this stage, it is considered likely that the following should be submitted with the application –

- CIL form and site location plan
- Existing and proposed block plans, floor plans and elevations
- Section drawings and plans incorporating topographic survey of the site confirming the existing and proposed levels both within the site and over the immediate boundary
- Accommodation Schedule
- Affordable Housing Statement
- Wheelchair Housing Statement
- Planning Statement
- Design and Access Statement (including Secured by Design measures)
- Ecological Appraisals
- Landscaping Scheme (including details of the green roof)
- Urban Greening Factor and Biodiversity Gain Calculations
- Arboricultural Report
- Energy Assessment and Sustainability Statement
- Surface Water Drainage Assessment
- Air Quality Assessment
- Noise and Vibration Impact Assessment
- Daylight/Sunlight and Overshadowing Report
- Fire Strategy
- Transport Assessment (including the information listed above)
- Construction Logistics Management Plan (CLMP)
- Photographs of existing site
- Planning Obligations including Draft Heads of Terms

- Statement of Community Involvement showing consultation with the local community.

### External consultees

You may wish to contact other relevant organisations external to the Council that will be consultees during the processing of a planning application, prior to finalising the proposal for submission for a planning decision. It is the case that consultees may raise issues that cannot be identified during the Council's consideration of a pre-application enquiry.

### **Summary and Disclaimer:**

Officers welcome the opportunity to re-engage with the applicant. As previously considered, subject to the potential impact on the adjoining LSIS, there is no in-principle objection to the proposed residential development of the site from a land use perspective.

Officers consider that further amendments in line with the comments above would help to create a scheme that responds better to its context and offers a better-quality residential development for this site.

I trust that you appreciate that all pre application advice given is without prejudice to the recommendation or final decision on any application submitted.

I hope that the above advice and comments are helpful, and that they summarise the issues that were discussed.

Yours sincerely,

*Agnieszka Nowak-John*

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