

Report of the Design South East Panel

Ringers Road

29th April 2021

The design review meeting

Reference number	1594/150421
Date	15 th April 2021
Meeting location	Online via Zoom
Panel members attending	Dieter Kleiner (Chair), architecture, community engagement Harriet Bourne, landscape architecture, public realm Ellie Howard, regeneration, architecture Amanda Reynolds, urban design, architecture Robert Sakula, architecture, housing
Panel manager	Lizzie Atherton, Design South East
Presenting team	Alex Richards, Holloway Studio Giorgia Golzio, Holloway Studio
Other attendees	Terry Pullen, The Substansia Group Maisie Driscoll, The Substansia Group David Francis, Imani Group Alice Moore, Boyer Mark Batchelor, Boyer Eleanor Trenfield, ETLA Richard Hammond, ETLA David Shetcliffe, Curtain and Co Claire Brew, London Borough of Bromley Ben Terry, London Borough of Bromley Kiki Gkavogianni, Design South East (Observer)
Site visit	This review was carried out during the Covid-19 outbreak in 2020/21. Independent site study including desktop research and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review.
Scope of the review	As an independent design review panel the scope of this review was not restricted.
Panel interests	Ellie Howard notified us that she works for the Greater London Authority, however Bromley Council is not within her area of work. This was not deemed to constitute a conflict of interest.

Confidentiality This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

The proposal

Name	Ringers Road
Site location	2-4 Ringers Road and 5 Ethelbert Road, Bromley BR1
Site details	<p>The site is 0.29 hectares and currently consists a one/two-storey bar/restaurant fronting 2 to 4 Ringers Road and a three-storey building fronting Ethelbert Road which includes a gym.</p> <p>The site is in close proximity to the High Street and approximately 300m from Bromley South station. The surrounding area is characterised by both residential development and commercial development including a two-storey detached house adjoining the site at 7 Ethelbert Road and two-storey semi-detached properties to the north of the site in Ethelbert Close.</p> <p>Adjoining the site to the east is the Salvation Army church and to the south of the site along Ringers Road are a number of purpose-built blocks of flats (4 to 11 storeys high). Development further to the east fronting the high street are commercial buildings with some residential uses at upper floors, ranging from 2 to 4 storeys high.</p>
Proposal	This is a proposal for a total of 109 dwellings within two blocks, including a mix of 1-bed, and 2-bed units in a part 19, part 12-storey building.
Planning stage	Pre-application
Local planning authority	London Borough of Bromley
Planning context	<p>Site allocation 10 in the Local Plan is for redevelopment of land to the west of high street and at Bromley South for mixed use, including 1230 residential units, offices, retail and transport interchange. Proposals for this site will be expected to:</p> <ul style="list-style-type: none"> • Incorporate a sensitive design which respects the adjoining low rise residential development whilst optimising its key town centre location. • Improve Bromley South Station

- Provide a high-quality public realm and accessibility to and through the site.
- Provide an attractive and active frontage to the High Street.
- Be accompanied by a Masterplan to show how the proposed development is consistent with a comprehensive development of the site.

Planning history	None.
Planning authority perspective	<p>Officers are supportive in principle but would like to see the site come forward for development as part of a masterplan. Loss of community uses (gym) will need to be considered against policy 20 of the Local Plan. Other existing uses include a bar/restaurant and potentially offices, triggering policy 97 'change in use of uppers floors' of the Bromley Local Plan. Consideration will also be given to the appropriateness of a completely residential scheme, given the aspirations in the Local Plan to develop Site 10 with mix of uses. The site has not been identified by the Local Planning Authority (LPA) as a suitable location for a tall building as there are no precedents for such tall buildings in this location and it would significantly alter the character of this part of the high street. The LPA also considers that there is a lack of justification for the density and height of the development and the impact on views into and out of the adjacent conservation area. They have concerns over the relationship with and impact on adjoining residential amenities.</p>
Community engagement	<p>A public consultation online webinar was held on 11th December 2020. The data has not been published to-date.</p>

Summary

We believe that there is considerable work to be done to develop a proposal that is contextually responsive to this edge of town centre location – particularly regarding the proposed heights. This requires a fundamental rethink of the design principles through a deeper understanding of Bromley town centre’s character and topography as well as the history of planning applications regarding taller buildings. This analysis will be critical to maximise the value of this development for its residents and the surrounding community.

The development of this site could contribute positively to Bromley’s aspirations for growth in the town centre and it is unfortunate that this scheme is not coming forward after the adoption of the relevant Supplementary Planning Document (SPD). We appreciate that the lack of an adopted masterplan means there is no clear structured vision for the wider area, but equally this is why it is imperative that the proposed scheme can sit alone within its current context.

We would strongly encourage the applicant team to re-engage with the panel once the following recommendations have been worked through.

Key recommendations

1. Reconsider the height and scale whilst providing a narrative for a tall residential building.
2. Study the topography and residential context further so that the sloped site assists with a sensitive transition from commercial high street uses towards residential uses.
3. Consider changing scenarios over time ranging from the Salvation Army building remaining for the foreseeable future to complete renewal of all adjacent buildings – and ensure the proposal works equally well irrespectively.
4. Produce an environmental strategy and ensure sustainability principles are embedded in the design proposals.
5. Create a community or civic offer at ground floor level, potentially in connection to the Salvation Army, informed by meaningful engagement with local stakeholders and the council.
6. Introduce generous communal and play spaces, that will make living in this development enjoyable. Greater consideration should be given to how people will meet their neighbours and form a community.

Detailed comments and recommendations

1. Design strategy
 - 1.1. The building proposed will be the tallest in the town centre and as such we would expect it to be of a particularly notable and high-quality design with some kind of civic and/or community use on the ground floor. However, it is a solely residential offer and since it is not located in a particularly noteworthy location there seems to be little call for its proposed height and visual impact on a residential side street.
 - 1.2. Considering the substantial number of units that are being introduced within a small building footprint, little consideration has been given as to how the development will create a community of residents, existing and future. The spaces created do not provide opportunities to socialise in a casual way which means fostering community in this development will be difficult.
 - 1.3. The proposal does not appear to have been informed by local needs despite a community engagement exercise being undertaken. The feedback from this exercise should be better valued, utilised and communicated. A bottom-up approach is needed, whereby local residents are genuinely engaged, and their input evidenced in the design.
 - 1.4. As part of the public engagement, we encourage the collection of demographic information to ensure that a diversity of groups takes part.
 - 1.5. Any development of this scale could only be supported if the public benefits are substantial.
 - 1.6. More analysis of the topography is required, as it slopes downwards towards both Bromley South station and the Church House gardens. An Italian hill town model is an appropriate precedent, where the tallest and most important civic buildings tend to be located on the hill's peak and building heights should consequently drop in response to the topography, emphasizing the hillside stepping effect. These principles would dictate lower building heights on the site.
 - 1.7. The scheme should be able to stand alone in its current context as well as working in the medium to long-term. Alternative plans that express how the scheme could fit into a variety of potential contexts - for example, without other developments coming forward - would be useful. Such drawings should make clear which developments are emerging/ already have planning permission etc. Ideally a clear masterplan for this urban block would be proposed showing change over time, providing context for the detailed proposals for individual buildings such as these ones.

- 1.8. The site itself lacks rationality as it is the result of at least two small sites being stitched together. The proposals have done little to resolve such an unusually shaped site as the development sits on the site boundary and has been extruded upwards with little consideration towards its neighbours.
 - 1.9. The applicant team would benefit from looking closely at past appeals regarding taller buildings in Bromley town centre that have been both allowed and dismissed, particularly those that have challenged the primacy of the theatre.
 - 1.10. The environmental strategy was not discussed in great detail. An environmental strategy with clear targets should be informing the development to give confidence that genuinely sustainable principles are being embedded. Although we do not recommend retaining the sloped roof form, if it is retained it could slope southwards and integrate a solar power system to optimise its environmental contribution.
2. **Townscape and architectural layout**
- 2.1. It is inappropriate to compare the site's location with Bromley South and use this character to inform the proposed designs, for example by mirroring the sloped roof of St Mark's Square. Bromley South has a very different character to the high street and the town centre, where the site is closest to. It would be more appropriate to benchmark against the Churchill Theatre, which is the tallest building in the town centre and has a civic role.
 - 2.2. A more modest design should be explored that does not have a large visual impact. The landmark features, such as the diagonal roof and breaks in materials mean the scheme stands out excessively and it does not fit coherently within the current townscape.
 - 2.3. The building needs to address and respect the neighbouring residential context sensitively, not only in terms of stepping down in height but also by allowing space around the site boundaries. A more sensitive design will aid a smooth transition along the roads from the higher density high street down the hill towards the lower density houses and the park.
 - 2.4. Efforts should be made to work with the Salvation Army building, as opposed to assuming it may come forward for development. It makes a valuable civic contribution that should be acknowledged in the proposals and it may remain for many years.
 - 2.5. A pedestrian route through the site should be considered, as opposed to the current proposal for a route entirely off site. This would encourage emerging developments to extend this route and create a convenient and attractive secondary pedestrian

connection from Bromley South station to Church House Gardens along the contours of the hill stepping down from the high street.

- 2.6. The consideration of long-distance views towards the site has been thorough but further visualisations are required regarding the shorter distance views of the scheme. The majority of people will experience the scheme close up so the views that should be prioritised are those from the high street and side roads, as well as the views from local residential buildings. These views should also account for the enhanced sense of overlooking due to the steep topography of Ringers Road and Ethelbert Road.
 - 2.7. Views should not suggest the building will not be visible as a result of trees or other vegetation as these may in time be removed if not within a conservation area or under a Tree Protection Order (TPO).
 - 2.8. It is unfortunate that the double fronted villa on Ethelbert Road will be demolished as it makes a positive addition to the street. If this building was retained it could assist with the transitioning of height and stepping down towards the residential buildings.
 - 2.9. The low number of single aspect dwellings is commended, but as a result there is an awkward and close boundary relationship with other buildings and consequently narrow, awkward and angled windows which should be resolved.
 - 2.10. A wider mix of dwelling sizes should be included to support a mixed and balanced community.
3. Communal and open spaces
 - 3.1. The proposal lacks communal open space.
 - 3.2. It does not feel as though the experience of those who will live in, walk past, and encounter this building has been prioritised within the design and the spaces it creates.
 - 3.3. The green roof on the lower block is welcomed, particularly if it allows for communal use such as a play area or growing space. In terms of the ground floor courtyard, although it has been well landscaped it is too small to accommodate users from 109 units especially as it will be shaded all year round.
 - 3.4. Play space is not provided which is unfortunate. Play provision not only gives children the opportunity to express themselves and exercise, it also fosters community. We encourage the applicant to look closely at providing play space on site.

- 3.5. Aerial photographs show existing trees on the site. We would like to see the tree survey to demonstrate that they can be protected and that their root protection zones are not affected by the development.
4. Frontages and streetscape
 - 4.1. The ground floor frontages are dominated by bin and cycle storage. The substation and bin stores are located along Ringers Road creating an inactive frontage. This is uninviting and unappealing and impacts the street and its users. More active frontage is needed to offer something to those walking past.
 - 4.2. Cycle storage should be accessible and celebrated as it contributes to bicycles being an easy and appealing mode of transport to use in a central town centre location.
 - 4.3. On both Ethelbert Road and Ringers Road the scheme has been pushed forward to the edge of the site boundary resulting in narrower and constrained footpaths. Along Ethelbert Road it would be more appropriate for the building to follow the established building line of 66-70 High Street.
5. Materials and detailing
 - 5.1. The approach to materials and detailing was not discussed in great detail at this review. Paragraph 130 of the National Planning Policy Framework (2018) states: *'Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).'*
 - 5.2. In order to be consistent with this national policy, the applicant team and local authority should note Design South East's general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

Confidentiality

If the scheme was not the subject of a planning application when it came to the panel, this report is offered in confidence to those who attended the review meeting. There is no objection to the report being shared within the recipients' organisations provided that the content of the report is treated in the strictest confidence. Neither the content of the report, nor the report itself can be shared with anyone outside the recipients' organisations. Design South East reserves the right to make the content of this report known should the views contained in this report be made public in whole or in part (either accurately or inaccurately). Unless previously agreed, pre-application reports will be made publicly available if the scheme becomes the subject of a planning application or public inquiry. Design South East also reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.

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The logo for Design South East, featuring a stylized yellow shape that resembles a speech bubble or a map outline of the region, with the text "Design South East" inside in white.

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