APPENDIX 7

Design Review Panel

Reference: 23/AP/1862

Proposal: Phased mixed-use redevelopment of the site, comprising:

> - Demolition of all existing buildings/structures, site clearance and excavation:

- Construction of buildings to provide residential dwellings (Class C3) and flexible commercial, business and service space

(Class E);

- Construction of buildings to provide purpose built student accommodation including associated amenity and ancillary space, flexible commercial, business, service and community spaces

within Classes E/F2(b) (Sui Generis); and

- Provision of associated car and cycle parking, open space and

landscaping, means of access and highway alterations,

installation of plant and utilities and all other associated ancillary

works incidental to the development.

Location: 747-759 & 765-775 Old Kent Road and Land at Devonshire

Grove, London, SE15 1NZ

Feedback from Design Review Panel, 13 March 2023

<u>Summary</u>

- The Panel welcomed the opportunity to review this important scheme on the Old 1. Kent Road by John Thompson Architects for student housing and affordable housing. It thanked the team for its clear presentation of the scheme, which had also been circulated to the Panel in advance, although the Panel would have welcomed more detailed information and townscape visuals on how the development sat within its existing and emerging urban context, and particularly in relation to Southwark's nearby waste management depot and its continued operation. It was pleased to review the proposals in what it considers to be an early stage of the design process.
- 2. As part of the design review, the Panel investigated further:
 - Site strategy revised strategy for the site, following the exclusion of a large parcel of Council-owned land from the red line boundary of the proposed development.
 - Open space how the applicant proposes to meets the scheme's requirement for public open space and play space.
 - Masterplanning assumptions about the wider site along the Old Kent Road including development expectations for the adjacent Council-owned parcel of land.

- Massing and density site coverage compared to the earlier consented scheme. In particular, the increase in density within the site, confirmation of floorspace, student bedspace figures and no workspace/offices.
- Layout/ massing how the grid was arrived at, the ascending heights of the blocks, links within the site and with the adjacent contexts (existing and emerging).
- Landscape the quality of the external spaces, the environmental performance of spaces between buildings and the positioning of playspace
- Arrival how the development responds to the local movement network and main arrival points by public transport and the journeys for residents with mobility issues.
- Ground floor layout clarification of the distribution of ground floor activities, the outcomes of bringing back-of-house services and student amenities to ground floor level, the ext.ent of active frontages, and implications for character of Sylvan Grove
- Interaction whether ground floor amenities are student-only or can be accessed by residents or wider public, and the impacts of sharing public open space on landscaping design and amenity.
- Cycle storage provision and access for residents, students and visitors, and handling peak-hour arrival/departures.
- Servicing arrangements number and distribution of service bays, particularly for students moving home, and impact of off-street spaces on public realm.

<u>Urban morphology</u>

- 3. Regarding its feedback, the Panel acknowledged the efforts of the development team in trying to move forward with this brownfield site, but was drawn to make comparisons with the extant consented scheme. The panel was much more confident how the latter would mesh with the existing and emerging contexts within this part of the Old Kent Road than the current proposal.
- 4. The Panel considered there was too little analysis and consideration of context in the design development of the scheme and too little demonstration of how the proposal would sit in the existing and emerging context of the Old Kent Road to allow for meaningful feedback. Intuitively, the panel felt that given their experience of the Old Kent Road and what was generally known of schemes on nearby sites (e.g., Toys-R-Us), the current proposals felt too high back of pavement on the Old Kent Road.
- 5. It was therefore incumbent on the applicant to rigorously test the proposed massing (and possible alternative heights and massing) alongside the optimal development for the council-owned site and the outline proposals for the Toys-R-Us site (such as they are). The appropriateness of the proposal needed to be tested in a series of sequential townscape views up and down Old Kent Road and looking north up Asylum Road. The views also needed to be tested against the extant permission (which effectively forms the baseline by which any proposed development will be assessed) so that the impacts of the scheme can be fully appreciated.

- 6. The Panel remained to be convinced on the distribution of heights and massing across the site, and the size and arrangement of the public realm. The built form on the reduced site had become too evened out, with little sense of an urban hierarchy (see below), whilst there was little evidence of an environmental or energy strategy, which would influence orientation and spacing.
- 7. Alongside this, the panel considered it was important for the scheme to explore how the proposed built forms interact with one another at low and high-rise levels as a sculptural set-piece and bring a dynamic quality to the townscape when moving along the Old Kent Road. This dynamic quality was strongly embedded in Allies and Morrison's extant scheme, highlighting its very absence in the current proposals.
- 8. Regardless of where the additional height is located, the panel was not convinced by the distribution of the types of residential accommodation across the site. It felt uneasy that all the affordable housing (including many family homes) being brought to the front, adjacent to the Old Kent Road, with the student accommodation located towards the rear. The quality of life for residents and for families in particular, should be a key priority in masterplanning, whilst there is a reasonable argument to be made that students are not permanent occupants. The Panel's view was that the applicant should explore alternative arrangements that look at placing the student accommodation on the Old Kent Road and the permanent housing further back in the site.

Human scale

- 9. The Panel expressed its concerned with the levels of inactivity of the development's ground floor frontages. Those onto Sylvan Grove were particularly impacted by back-of-house and servicing, despite the public realm being shared with existing housing opposite. Key building corners and frontages within the development were not supported by active uses, whilst there was insufficient recognition that the adjoining development sites may remain hoarded for some considerable time or indeed that their active frontages/ public spaces may not prove forthcoming. This brought into question the quality and public safety of the scheme's public realm.
- 10. The scheme lacked sufficient legibility, with no strong sense of the buildings' fronts and backs or evident hierarchy of routes and spaces. As with the building heights, its spaces have become too even, and whilst there may have been a plan to promote the east-west movement across the site, this seemed contradicted by the servicing bays that blocked the route.
- 11. The condition of the ground floor frontages lacked sufficient awareness for the quality of pedestrian experience or creating a strong sense of place. A clearer vision needed developing for the co-ordination and synthesis of key external spaces supported by active frontages. It was also uncertain whether ground floor student amenities were open to the wider community, and it was noted that elements appeared windowless, hampering any engagement.

- 12. The panel expressed its concern with the quality of the internal accommodation. The flat layouts relied too much on deep floorplans and deeply recessed kitchens, where daylighting would be problematic. The proposed corner cut-away balconies (which can work well for one-bedroom flats) are less successful as a way of achieving meaningful dual-aspect homes for the larger, 3-bedroom flats.
- 13. The block positioning –with 12m separation distances between habitable rooms of opposing buildings– may well impact the quality of daylighting and extent of direct views, particularly for the single aspect student rooms. Any devices to restrict or direct outward views would only further limit daylight penetration.
- 14. There needed to be a better distribution of communal student spaces within the blocks, with more emphasis on locating communal rooms on more floors and thoughtfully positioning them in response to the architecture, but also to the amenity constraints. In addition, if the main facilities were to be limited to student-only access, consideration should be given to bringing these to first floor level, freeing up the ground floor for more publicly engaging uses.
- 15. The new community space was supported, although at 45 sqm the provision felt rather mean given the size of the local community and a larger space was encouraged, particularly if the development was to appeal to the wider community. Furthermore, its provision should look to dovetail with the landscaping, enhancing its offer with the opportunity of using adjacent outside space as a way of extending the versatility of the facility and providing a secure space for children and families to use both inside and outside spaces.
- 16. Regarding the landscaping, the proposals needed to better define what was general amenity and genuine playspace, as the 'boundaries' appeared blurred. It is important that the playspace is meaningful and not intermittent. The development should also acknowledge that, whilst there is no policy requirement for outdoor space in relation to student housing, the on-site need remains nonetheless; this only adds pressure to the limited public space generated by the scheme's own housing provision.

Architectural expression

- 17. The panel recognised that the scheme was in its early design stage, but wished to address the emerging architectural expression from a wider urban perspective, which it considered to be too corporate looking in its appearance. This comes largely from the proposed use of the angled fins for the student rooms, designed to restrict overlooking, but which the Panel also identified as unreasonably limiting their amenity (see above).
- 18. It was also concerned with how different architectural elements read against each other within and between the blocks. The efforts to alleviate the sense of scale within the development was unsuccessful; particularly on block D, where its facade composition was uncomfortable and its massing unconvincing when brought onto the same elevational plane. As referenced earlier, the buildings' forms seemed unresponsive to each other or to the intervening spaces, with the one or two chamfered corners and edges feeling tokenistic rather than being part of a coherent architectural language. The architecture needed to develop a greater, more sculptural relationship, and bring the buildings and public realm together as a compositional whole. The extant scheme is more accomplished in this regard.

<u>Vision</u>

19. The panel was not convinced the project had a clear enough sense of place, particularly for proposals with an ambition to accommodate approximately 1500 new residents and students, and that this needs to underpin any designs that comes forward.

Conclusion

20. Overall, the new proposals are in their early stages, and whilst there is clear ambition to bring a development forward on a reduced site, the Panel was not convinced of the proposed height and massing or distribution of blocks and activities. The revised scheme had yet to develop a sense of place with an underperforming groundscape. There seemed to be an over-reliance on the public realm generated on adjoining development that may not come forward. The Panel urged further dialogue with the Council regarding the red-line boundary. Lastly, given the nature of the comments and the constrained condition of this Old Kent Road site, the scheme should be brought back to a subsequent DRP for its consideration, and certainly prior to any planning submission.