

Response to Urban Design comments (21/05276/FUL)

2 Station Road, Great Shelford, Cambridge, CB22 5LR

Para	<u>Urban Design Officer</u>	<u>Applicant comment</u>	<u>Policy</u>
Para 2.1	<p><i>Proposed height of 2.5 to 3 storeys have resulted in an out of context built form which will adversely affect the existing context character.</i></p>	<p>Disagree. The context of this side of Station Road is of development of 2.5 and 3 storeys. The adjacent townhouse scheme is an integral and successful part of the streetscene and cannot be ignored. The consented care home scheme rises up to three storeys with a pitched roof in excess of the application proposal which is visible from Station Road. There are also examples of 2.5 storey development at Station Court and further afield in Great Shelford. We consider the comment that 2.5 to 3st is out of context is incorrect. I would also note that the Conservation Officer's comments are that the proposal will not affect the conservation area which is the other side of Station Road. We therefore consider the proposed height of the development would not affect the existing character.</p> <p>It also worth noting the Inspector's decision notice when allowing consent for the adjoining townhouse scheme (APP/W0530/A/11/21552255) at Paragraph 5 of the decision letter;</p> <p><i>'The two and three-storey elements of the development would be taller than the adjoining office building and the two-storey houses on the other side of the road. Like some of the taller commercial buildings next door, the three-storey element of the development would be partly screened from wider public view by the buildings in front of it.....Consequently the design, height and scale of the proposed development would not stand out in the street scene as being at odd with the nearby houses or commercial buildings.</i></p> <p>NPPF, Paragraph 130 (c) advises that planning decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)</p> <p>Paragraph 130 (e) advises that planning decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks.</p> <p>5.1 paragraph 64 the National Design Guide states:</p>	<p>Complies with NPPF Para 130, National Design Guide C1, I1 & I3, Policy HQ/1 & NH/14 of the South Cambs Local Plan</p>

		<i>“Well-designed new development makes efficient use of land with an amount and mix of development and open space that optimises density. It also relates well to and enhances the existing character and context.”</i>	
Para 2.2	<p><i>'The development would be overbearing for the neighbouring site....south-eastern part of the development is very close to the consented scheme to the south (care home)'</i></p> <p><i>'visually unpleasant space between the buildings'</i></p> <p><i>'compromises public realm'</i></p>	<p>Disagree. The care home to the south increases in height and scale to the rear and is in fact higher than the retirement living proposal. We cannot therefore see how it can be alleged that the application proposal is 'overbearing' on the care home to the south given the scale and mass of the care home. It should also be borne in mind that the existing buildings on site are of a comparable height and scale to the application proposal for retirement living but sit closer on the boundary of the site with the care home. In allowing the care home scheme the Council would have considered that relationship to existing buildings was acceptable. Given the proposed built form is set further away than the existing buildings the allegation that the proposal is 'overbearing' is respectfully considered to be unsustainable.</p> <p>The consented scheme has the area between the care home building and the existing commercial buildings on site as hard standing for the access road and car parking. The proposed retirement living application will remove the existing buildings and introduce soft landscaping on the southern boundary with the ability to introduce new trees. Given the current relationship of the care home to existing commercial buildings and its harsh visual appearance the proposed scheme cannot be anything other than a visual improvement to the space and visual improvement to the setting of the care home.</p> <p>For reference the closest point of the proposed building is a blank flank wall which is 13.5m away from the care home and in excess of the 12m set out in the Council's Design Guide.</p> <p>The care home's access and car parking area is all private owned as such there is no '<i>public realm</i>' in this area. Station Road is closest area of public realm.</p>	HQ/1
Para 2.3	<i>'Scale and position of the development would be too prominent on Station Road'</i>	<p>Disagree. The scale of the proposed building is directly comparable to the adjoining townhouse scheme in terms of height. It follows the building line established by the townhouse scheme and is shorter in length than the adjoining townhouse scheme. The reinforcement of the building line with the townhouse scheme next door is considered to strengthen the townscape of this part of Station Road. We fail to see how its scale and position are unacceptable and certainly not 'too prominent' given the adjoining townhouse scheme.</p>	Para 130, 134(a) NPPF, HQ/1

		<p>The design approach is considered to positively enhance the character of this part of the road and improve the public realm. The proposal removes a building which turns its back on the road with a blank façade. The proposed scheme introduces a new frontage to the road introducing natural surveillance along this part of the road. It also widens the public footpath making it far safer and more pleasant for pedestrians using the footpath, particularly prams/buggies and mobility scooters. The front garden areas to the front of the building line introduce semi-private space and the opportunity to introduce greenery and planting to an area currently devoid. Paragraph 63 of the National Design Guide states that well-designed places <i>have recognisable streets and other spaces with their edges defined by buildings, making it easy for anyone to find their way around, and promoting safety and accessibility.</i></p> <p>These positive enhancements are reflected in the Conservation Officer's comments of no harm to the conservation area, and the Parish Council's positive support for the scheme. We consider the proposed design is the correct response for the townscape and has had due regard to comprehensively tying in the adjoining developments and sits harmoniously with its neighbours.</p>	
Para 2.4	<p><i>'The generous step back along with the reasonable 2-storey height facing the road has resulted in a harmonious relationship with the road.....further stepping the building back and reducing the height of the building facing Station Road can offer a smooth visual transition.'</i></p> <p><i>'stepping down the roof in some parts of the main stretch of the block running east-west'</i></p>	<p>Comment. The care home site has a very short road frontage requiring an access road with suitable visibility splays. This combined with the requirement for a single footprint building and the extent of the land to the rear for redevelopment means that the care home had to be set back into the site for functional reasons. The care home site also relates more closely to Reed House to the south, whereas the site subject of this application relates closer to the adjoining townhouse scheme reinforced by the break in the townscape created by the care home site. We do not consider stepping the building back further into the site would positively relate to either the townhouses to the north or the care home to the south.</p> <p>Mindful of national planning policy guidance in respect to making effective and efficient use of land (Para 119 & Para 120d NPPF) we do not consider stepping the building back into the site would indeed make effective use of the site aswell as not creating the correct positive townscape response to Station Road.</p> <p>We do not consider it necessary for the roof of the east-west to step down. The care home scheme was deemed acceptable in stepping up to three storeys through the central part of the site running east-west.</p>	Para 119, 120, 134(a) NPPF, HQ/1
Para 2.5	<i>'The eastern wing of the building is invading</i>	Disagree. Early site layouts considered a different footprint however the proposed layout was	National Design Guide N1, HQ/1

	<i>what could have been a practical green stretch amenity space facing south resulting in some unusable spaces which lack natural surveillance'</i>	considered to offer the best solution. This layout reduces apartments facing north and south to the adjoining sites. It provides an eastern area of amenity space and allows physical connection through the grounds from the northern area through the eastern area to the southern area. Allowing and encouraging residents of the scheme to perambulate the grounds is a positive design response. It also provides natural surveillance to all aspects of the building which the previous layouts failed to do.	
Para 2.6	<i>'the main parking spaces area is invading the amenity space to the east.'</i> <i>'Such arrangement has also resulted in a poor view out of the apartments which would be facing this parking area.'</i>	Comment. We considered the parking arrangement for the scheme with the parking shown on the approved plans being considered to be the preferable solution. It is adjacent to the parking area of the townhouses to the north and on the boundary with the railway line to the east. The alternative would have been to remove the amenity space to the north of the residents lounge and reintroduce parking spaces in this location however this has been considered to result in a poorer quality visual approach to the buildings entrance and for users of the resident's lounge when viewing out. We would disagree with the comment about a poor view out for apartments. There are only three apartments with a view towards the parking area, the first and second floor apartments have views over the railway line beyond to the surrounding part of Great Shelford. The ground floor apartment has an area of patio and screened from the parking area by proposed hedging. It is also important to understand the communal nature of these developments and that the grounds are communal with residents having access to a variety of areas and aspects of the grounds to enjoy amenity space.	HQ/1
Para 2.7	<i>'It is not clear who is expected to use the amenity space proposed to the front of the building. If this was meant to be used by the residents, these spaces would fail to meet privacy and day light standards'</i>	Comment. The area of amenity space to the front of the building serves as defensible space to the ground floor apartments and also reinforces the road character of this side of Station Road started by the townhouse scheme to the north. It introduces an element of soft landscaping to a site currently devoid of planting. This area is semi- public space and whilst residents may choose to provide additional plants or pots to this area we would anticipate that they would use other parts of the communal grounds and resident's lounge for amenity.	National Design Guide N1 HQ/1 and Para 6.73 District Design Guide
Para 2.8	<i>.The distance between the habitable rooms of the development and the consented scheme to the south do not meet minimum standards as set out in Paragraph 6.68 of the</i>	Comment. The District Design Guide allows for reduction of the 30m distance between 3 storey residential properties where the alignment is significantly offset. The proposed footprint of the building does off set windows to the care home to the south, and in this case it is considering the relationship of windows from C3 residential dwellings to a C2 care home. The closest window to window	HQ/1 and Para 6.68 District Design Guide

	<i>District Design Guide SPD.'</i>	distance with the care home is 25.2m. However, the separation in distance needs to be considered along with the benefits to residents of the care home with the removal of the existing buildings on the boundary which could be converted under permitted development to residential accommodation. The visual improvement by the removal of these buildings with the introduction of landscaping and tree planting is considered to offset the marginal reduction in the separation distance set out in Paragraph 6.68 of the District Design Guide SPD.	
Para 2.9	<i>'...electric wheelchair parking...must be in a more convenient space and as close to the entrance as possible'</i>	<p>Comment. The age and nature of residents is such that we do need to make allowances for mobility scooter storage. From market research of customers and potential customers whilst they acknowledge that such facilities are needed they have told us they prefer them to be discreetly as well as conveniently located. They do not wish to be reminded that they are needing of the facilities with them located immediately next to the entrance. This is retirement living to allow residents to maintain 'independence' for as long as possible and not a care home where the needs for such scooters may be greater and resident mobility may be much less.</p> <p>The refuse store is accessed internally by residents and it is only on bin collection day that the external doors will be opened.</p> <p>However, the chosen position of the mobility scooter store is something we are happy to give further thought to.</p>	No policy relating to mobility scooters. Applicant market leader in the provision of this form of accommodation.
Para 2.10	<p><i>'Some of the parking spaces at the site entrance are arranged randomly...</i></p> <p><i>'No blue badge spaces are provided on site.'</i></p>	<p>Comment. The shape of the site provides an unusual area of land to the north of the access road. We have chosen to use this area in a sensible manner to the benefit of the development and area by providing some additional parking bays and enhanced landscaping. I would note that there is no highways objection to the location or positioning of these parking spaces and it does not detrimentally affect the design of the development. Having regard to national planning policy guidance it makes a good use of the site.</p> <p>Parking spaces at these developments are unallocated and blue badge bays tend not to be demarked on site but we can indicate a blue badge space if necessary on the plans.</p>	TI/3, HQ/1
Para 2.11	<i>'Amenity Space....given the overall layout design, these spaces are considered insufficient for the number of the expected residents.'</i>	Disagree. The proposed scheme is for specialised accommodation for older persons the District Design Guide SPD does not provide any guidance on amenity space provision for specialised accommodation for older persons. The average occupancy rates for this form of accommodation is 1.3 persons per apartment so the proposed scheme would have in the region of 50 residents when fully occupied. The average of	National Design Guide H2, HQ/1 and Para 6.75 of the District Design Guide SPD

		<p>residents on first moving into these developments is 79 years of age and many are moving because of increasing mobility issues or following a death of a partner looking for a communal form of accommodation. Residents of this age use amenity space in a passive way and the variety and quality of it visually is more important than the quantum.</p> <p>The most important area of residential amenity for these types of schemes is not the external gardens but the residents' lounge which can be used all year round and in the evenings. We would be very happy to take officers around one of the applicant's completed development so they can see and understand how amenity space operates with these schemes.</p> <p>Having regard to the Council's Para 6.73 of the District Design Guide SPD the communal gardens are convenient to use with access directly from residents lounge and alternative access to the southern garden area. There is a clear variety and distinction between areas of amenity space intended for private use and semi-public spaces. The amenity space provided is not bisected by roads or parking courts and a variety of aspects and areas are provided around the building all of which are communally used. People moving into these developments understand their communal nature and the communal nature of the grounds and as such the privacy of residents on the ground floor is not affected. Private patios are demised to each of the ground floor apartments. The application clearly defines the different areas of amenity space and is submitted with a detailed landscaping strategy plan which provides appropriate sensory planting and opportunities for sitting and socialising.</p> <p>Paragraph 130 of the National Design Guide states <i>'Well-designed private or shared external spaces are fit for purpose and incorporate planting wherever possible. The appropriate size, shape and position for an external amenity space can be defined by considering; (i) How the associated building sites in the wider context, including access to public and open spaces; (ii) <u>how the amenity space will be used, what for and by whom.</u></i></p>	
Para 2.12	<i>'The submitted details shows that only some apartments would benefit from balconies, contrary to Paragraph 6.75 of the District Design Guide SPD.'</i>	<p>Disagree. The District Design Guide does not provide any guidance in respect to amenity provision for older persons accommodation which differ in their nature to mainstream forms of accommodation. Paragraph 6.71 which promotes the use of balconies, roof terraces etc. states they can offer significant benefit to residents where <i>they are properly integrated into new development, respect local character, are secure, quiet, attractive and have good microclimate.</i> 19 of the proposed apartments have patios or balconies. We considered in terms of townscape that it would</p>	HQ/1 and Para 6.71 District Design Guide SPD

		not respect local character to attach balconies to the Station Road frontage, and we were mindful of the relationship to the railway line and the townhouses to the north. Having regard to paragraph 6.71 & 6.74 of the District Design Guide we consider the proposed scheme is acceptable. I would refer specifically to the last two bullet points of 6.74 which advise balconies should be places on the quiet side of the building and relate well to the architecture of the building on which they are placed.	
Para 2.13	<i>'...the development is likely to result in overshadowing areas of the amenity spaces provided on the site.'</i>	Comment. This form of accommodation as set out in the comments to Para 2.11 above is a specialised community of like-minded people of similar age and character. From the Client's experience of building over 160 developments of this type providing areas of amenity space that have shading as well as those that provide direct sunlight is a benefit of the scheme and to the residents. The most important area of amenity space for residents is the communal lounge as it is not subject to microclimate and can be used all year round. On this scheme residents have the choice and variety of external amenity space areas and can use not just amenity space with a northern aspect but also amenity space with east and southern aspects. Having amenity space that provides shading is a positive design feature for the Client's residents who typically 80 years of age. Para 125 (c) of the NPPF also advises that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).	Para 125(c) NPPF,
Para 2.14	<i>'At least one lounge area should be provided per each floor.'</i>	Disagree. The applicant is one of the market leaders of the provision of this type of accommodation for the last 25 years and has continually received a 5 star housebuilder rating from the NHBC which is determined by customer feedback. All their developments have a single lounge on the ground floor adjacent to an area of external amenity of varying sizes depending upon the number of apartments. These forms of specialised accommodation are about bringing together older persons who may have lost a partner and looking for companionship or community. Having a single lounge as a focal area for all helps engage everyone with social interaction and meeting residents within the development. The Covid pandemic has identified just how important social interaction is for this form of accommodation. To have two lounges would simply separate residents and dissipate the community spirit. I am also mindful of National Planning Policy Framework guidance which advises that developments should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development. Given the success of these forms of development and the Government's advice that is critical we deliver more homes for older	No policy detailing internal accommodation. Applicant one of the market leaders in the provision of specialised accommodation for older people

		persons I cannot justify adding a further communal lounge at the expense of an apartment.	
Para 2.16	<i>'...residents of the eastern wing of the building would have to travel through the building to the south western end to access the amenity space..'</i>	Comment. Access to the amenity grounds can be achieved via the main entrance and door on the south western part of the building. This is a relatively small scheme of Retirement Living apartments and the two access points are considered sufficient to meet the needs of residents. Residents of these schemes also value security highly and the main entrance door is controlled through video phone entry but to introduce further communal doors into the building does compromise the overall ability to ensure a secure environment for residents.	HQ/1
Para 2.17	<i>'...no information on cycle parking..'</i>	Comment. Further information on cycle parking has been provided with this note. The average age of residents on first moving into this form of development is 79 years of age and many choose to do so to live in more appropriately accommodation to address any mobility issues. As such cycle ownership at these developments are very low with 1 cycle owned per every 40 apartments. As such the need for cycle parking provision is very low and limited to house manager and visitors which is usually covered by provision of Sheffield cycle stands. This can be controlled by condition and not a basis for a reason for refusal.	T1/3