

Planning Committee Agenda



To: Councillor Michael Neal (Chair)
Councillor Clive Fraser (Vice-Chair)
Councillors Ian Parker, Simon Brew, Lara Fish, Sean Fitzsimons,
Mohammed Islam, Mark Johnson, Humayun Kabir and Appu Srinivasan

Reserve Members: Leila Ben-Hassel, Louis Carserides, Chris Clark,
Danielle Denton, Christopher Herman, Joseph Lee, Endri Llabuti,
Ellily Ponnuthurai, Holly Ramsey and Luke Shortland

A meeting of the **Planning Committee** which you are hereby summoned to attend, will be held on **Thursday, 23 November 2023** at the rise of Planning Sub-Committee but not earlier than **6.00 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

KATHERINE KERSWELL
Chief Executive and Head of Paid Service
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Tariq Aniemeka-Bailey
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www.croydon.gov.uk/meetings
Wednesday, 15 November 2023

Members of the public are welcome to attend this meeting, or you can view the webcast both live and after the meeting has completed at <http://webcasting.croydon.gov.uk>

If you would like to record the meeting, we ask that you read the guidance on the recording of public meetings [here](#) before attending

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The agenda papers for all Council meetings are available on the Council website www.croydon.gov.uk/meetings

If you require any assistance, please contact Tariq Aniemeka-Bailey
020 8726 6000 x64109 as detailed above.

AGENDA – PART A

1. Apologies for absence

To receive any apologies for absence from any members of the Committee.

2. Minutes of Previous Meeting (Pages 5 - 14)

To approve the minutes of the meeting held on Thursday, 3 August 2023 and Thursday, 14 September 2023 as an accurate record.

3. Disclosure of Interest

Members are invited to declare any disclosable pecuniary interests (DPIs) and other registrable and non-registrable interests they may have in relation to any item(s) of business on today's agenda.

4. Urgent Business (if any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Development presentations (Pages 15 - 16)

To receive the following presentations on a proposed development:

There are none.

6. Planning applications for decision (Pages 17 - 20)

To consider the accompanying reports by the Director of Planning & Strategic Transport:

6.1 6.1 23/00872/FUL - Croydon Park Hotel, 7 Altyre Road, Croydon, CR9 5AA (Pages 21 - 100)

Demolition of the existing buildings and retention of the existing basement, site preparation and enabling works to allow for the erection of a residential building (Use Class C3) comprising a maximum 447 homes with a maximum height of 36 storeys and community floorspace (Use Class F.1/F.2) on the ground floor, highways and access works, landscaping, car and cycle parking, and other associated works.

Ward: Addiscombe West

Recommendation: Grant permission

6.2 6.2 23/03175/FUL - Royal Russell School, Coombe Lane, Croydon, CR9 5BX (Pages 101 - 170)

Demolition of existing Junior School. Erection of replacement Junior School including Multi-Use Games Area, sports pitch, play and landscaped areas, access and plant, and other associated works.

Ward: South Croydon

Recommendation: Grant permission

7. Items referred by Planning Sub-Committee

To consider any item(s) referred by a previous meeting of the Planning Sub-Committee to this Committee for consideration and determination:

There are none.

8. Other planning matters (Pages 171 - 172)

To consider the accompanying report by the Director of Planning & Strategic Transport:

There are none.

8.1 Weekly Planning Decisions (Pages 173 - 232)

Attached is the list of Delegated and Planning Committee/Subcommittee decisions taken between 30 October 2023 and 10 November 2023.

9. Exclusion of the Press & Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

"That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended."

Planning Committee

Meeting held on Thursday, 3 August 2023 at 6.00 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Michael Neal (Chair);
Councillor Clive Fraser (Vice-Chair);
Councillors Ian Parker, Leila Ben-Hassel, Simon Brew, Lara Fish,
Sean Fitzsimons, Mark Johnson, Humayun Kabir and Appu Srinivasan

Also Present: Councillor Samir Dwesar

Apologies: Councillors Mohammed Islam, Leila Ben-Hassel (Lateness)

PART A

29/23 **Minutes of Previous Meeting**

RESOLVED that the minutes of the meetings held on Thursday, 9 March 2023 and Thursday, 6 April 2023 as accurate records.

30/23 **Disclosure of Interest**

There were no disclosures of a pecuniary interest not already registered.

31/23 **Urgent Business (if any)**

There was none.

32/23 **Development presentations**

33/23 **23/00486/PRE - 50 High Street (Purley Leisure Centre, Car Park and Former Sainsbury Supermarket), Purley**

Demolition of the existing buildings and erection of 4 buildings of 5-13 storeys to provide a leisure centre, commercial unit, approximately 246 age-restricted and care units (Use Classes C2 and C3) with associated facilities, public square and route through the site, and car park.

Ward: Purley and Woodcote

Nicholas Alston and Tom Banfield attended to give a presentation. They then responded to Members' questions and the issues raised for further consideration.

Councillor Dwesar addressed the Committee with his view on the Pre-Application. The below gives a summary:

- The proposed development would provide a pool and leisure centre for the local residents, and has the potential to revitalise the district centre.
- This would create more footfall in the local area as there would be more desirable shops and cafes present. Support the inclusion of a public square, route through the site, bistro and soft play.
- Many of the plans for the proposed development were in line with the Purley strategic framework.
- There were concerns that one of the buildings, which would sit at 12 storeys, was too high and was not policy compliant.
- There was a suggestion that buildings C and D be separated as together they led to greater massing.
- The parking proposed was not acceptable, he recognised that the multi-storey car park would need to be removed for the project to be viable. However, he believed that 44 public car parking spaces and 34 parking spaces for residents was not workable.
- He asked officers and Polaska to provide more data on parking as the final plans would need to be informed by evidence and more parking would need to be provided.
- He wanted to see more 2- and 3-bedroom units and the inclusion of schemes for first time buyers. Suggested some accommodation for younger people.
- He would also like the developers to provide some garden space for residents.
- The 246 units proposed would place additional stress on the existing social care and health infrastructure.
- Encouraged by the initial concepts.

Councillor Ben Hassel joined the meeting at 6.40pm

Land Use

Parking

- Members explained that as the site was located near to a route into central London, the parking spaces could potentially be occupied by commuters. There was a concern that the developers had not considered the number of people using the swimming pool who would also need parking spaces.

- Members noted that the developer had mentioned that there were four car parks in the town centre and enquired where they were located and who had ownership of them.
- Members felt as though the proposed cycling enhancements did not offer much encouragement. There was also a belief that cycle storage was an issue as it was not ideal for bikes to be left outside.
- Members were concerned whether there were any electrical charging points for residents.
- Members asked if there any scope to deal with an increased demand for parking.
- Members stated that the British rail carpark was under a current application and the number of spaces may decrease which would put further strain on the proposed car park.
- Members queried whether the car parking survey had been shared with the Council transport officers.
- Members suggested that there is increased research on parking needs.

Integrated Retirement Community and Commercial uses

- A Member declared an interest as he was a resident of Purley and a Councillor for Coulsdon, as the Coulsdon residents would also benefit from the introduction of the pool.
- Members asked whether there was a case to be made to introduce a number of units that were suitable for individuals under the age of 50.
- Members highlighted that there was already a number of care homes in Purley and there was concern on the impact of having an influx of older residents would have on local transport services, medical services, public social services etc.
- Members queried why the developer chose to propose an Integrated Retirement Community (IRC) rather than a more conventional residential development with affordable housing or a build to rent scheme for example.
- Members enquired about how the Council would assess the demand for this type of development in the area and would adult social services be involved to ensure that the demands were being met.
- Members also queried about the process in which a resident could change the type of unit they were living in as they aged and required more support from carers. This also covered the finances and who gets priority.
- Members stated that they would have liked to see some family units included to create a more diverse community for the residents.
- Members enquired whether the introduction of an integrated care facility be supported in Purley as there were already 35 care homes in the local area.
- Members queried how the need for a care facility would be considered.
- Members highlighted that planning policy required more three-bedroom units to be included on a development of this size than what had been proposed and queried whether there would there be any intent to increase the number of 2-bedroom homes and reduce the number of studio flats. Suggested creating bigger units for intergenerational use.

- Members queried whether there would be an increase in the number of dual aspect homes.
- Members asked developers to explain how natural daylight would reach the pool.
- Members queried on how easy would access be to the pool, for maintenance etc.
- Members enquired whether the leisure centre managed to incorporate gyms, café, shops etc. to maximise income.
- Members queried the use of the facility by schools and what spaces they would need.
- Members asked whether the proposals for the pool were based on a brief provided by the Council and did the brief have an underlying business plan and has this been signed off by the Council corporately.

Design

- Members queried where coaches would be able to stop to drop school children off at the site, and how large groups would be managed.
- Members suggested a small communal area for kids within the leisure centre
- Members explained that the Croydon Local Plan limited the height of developments within Purley, and some felt as though 12 storeys was too high for the development and hoped that there was some flexibility in the scale of the development - noting the pool was needed in the local area.
- Members queried how the public square would function in terms of use, how well would it be overlooked in terms of active frontages and whether there would be any private space for residents.
- Members suggested making the public route clearer and to give consideration to lighting. They also queried how accessible and legible the route would be.
- Members encouraged the developer to make the development exciting with clear public and private spaces.
- Members raised that the Place Review Panel stated that if the building was to remain at 12 storeys it would have to be of a high architectural quality and enquired where developers saw their development in terms of quality.
- Members queried whether the height of the development would be better suited within the middle of the site.
- Members suggested that there was a small communal play area for children to play.
- Members asked whether the developers could incorporate a water feature.
- There was concern about the potential excessive shadows which would be caused by the high-rise buildings in the proposed development, and a proper sunlight assessment would need to be carried out.
- Members queried where the two lifts would be located.
- Members enquired about the colour palette being considered for the buildings.

- Members suggested the servicing points be rationalised to minimise traffic and access points.

Affordable Housing

- Members queried whether there were any discounted properties on the site for residents who were less financially able to afford a property.
- Members queried how important was it for the developers to make the scheme inclusive of all residents with different financial capabilities.
- Members asked whether the developer had any discussions with housing associations who provide housing for the elderly and whether there had been any discussions with the Greater London Authority (GLA) about the availability of funding.
- Members queried whether the developer would consider identifying partners who may want to contribute to the funding of the pool. Members enquired whether affordable housing would be provided off site and wanted to see further exploration of on or off-site affordable housing.
- Some members stated that if the developer did move away from an IRC development, then they would like to see some first-time buyer initiatives introduced.
- Some members emphasised the need for an affordable housing policy compliant scheme, and how important is it for the developer to make the scheme inclusive and mixed/balanced.

Other Matters

- Members highlighted that the project would involve knocking down existing buildings before building new developments which was not eco-friendly.
- Members sought reassurance that there was a low carbon energy scheme for the development and that there would be a natural ventilation in the sports areas and questioned how these issues had been factored into the plans for the development.
- Members noted the potential heating cost of the swimming pool, and suggested that the energy source for the leisure centre should be separate to the remainder of the development.
- Members enquired about the Councils corporate response to the proposed development.

34/23 **Other planning matters**

There were none.

The meeting ended at 8.17 pm

Signed:

Date:

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Public Document Pack

Planning Committee

Meeting held on Thursday, 14 September 2023 at 6.30 pm in Council Chamber, Town Hall,
Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Ian Parker
Councillor Clive Fraser (Vice-Chair);
Councillors Simon Brew, Chris Clark, Lara Fish, Mohammed Islam,
Mark Johnson, Humayun Kabir, Luke Shortland and Appu Srinivasan

Also Present: Councillor Michael Neal

Apologies: Councillors Michael Neal and Sean Fitzsimons

PART A

35/23 **Minutes of Previous Meeting**

RESOLVED that the minutes of the meeting held on Thursday, 18 May 2023 and Thursday, 8 June 2023 as accurate records.

36/23 **Disclosure of Interest**

There were no disclosures of a pecuniary interest not already registered.

37/23 **Urgent Business (if any)**

There was none.

38/23 **Appointments**

Resolved to appoint Councillors Leila Ben-Hassel, Mohammed Islam and Appu Srinivasan.

39/23 **Planning applications for decision**

40/23 **22/03825/FUL - 111 - 113 Brighton Road, South Croydon CR2 6EE**

This item was withdrawn.

41/23 **22/00638/FUL - Hotel, 22 St Peter's Road, Croydon, CR0 1HD**

Conversion of existing hotel to 6no. residential units including internal reconfiguration and external alterations and changes to boundary treatment, and construction of a detached three storey dwellinghouse on the site, facing Aberdeen Road.

Ward: South Croydon

The officer presented details of the planning application and in response to members' questions explained that:

- The requirement for storage space was the same for any new residential unit created. There was no storage requirement for units 1 to 6 because it was conversion scheme which made minor changes to the envelope of the building.
- There was work being done internally to accommodate for the six units but given that the weight was being given to the conversion scheme, officer found it acceptable that the developer has not provided storage space.
- The units were oversized, which compensated for the lack of private amenity space and storage space provided.
- The London plan policy T6.1 set out different residential units in comparison to the PTAL. The site of the proposed development had a PTAL rating of 5 and London policy stated that if the area had a PTAL rating of 5 or 6 then it should be a car free development.
- The development was in a controlled parking zone so there were powers to restrict future occupiers from gaining parking permits which would also reduce parking stress.
- There was no policy protection for the hotel on the site, hence why the loss of the hotel was deemed to be acceptable.
- The section 106 agreement would provide three years of car club membership per unit. The sustainable transport contribution was £10,500 and would contribute to the provision of car club bays in the area.
- As there would not be any wheelchair accessible units in the development, there would be no provision for disabled parking bays. The removal of parking permits would exclude blue badge holder so individuals need to use disabled bays in the area would be excluded from the controlled parking zone (CPZ).
- There were three CPZ's in the area.

- The car club bays could be provided across the borough and not just outside of the CPZ's.

Roger Maile spoke in objection to the application, Oliver Lazarus spoke in support of the application and the ward Member Councillor Michael Neal addressed the Committee with his view on the application. After the speakers had finished, the committee began the deliberation, during which they raised the following points:

- It was accepted that there was no policy protecting the car park and for the land to continue to host a hotel.
- There was some doubt about the practicality of the car club.
- The house was policy compliant but appeared to be squeezed into a tight area.
- Members wanted to keep the fence at the same height and to replace any trees lost to maintain privacy of residents.
- A car club would need to be placed closer to the development.
- The 20m difference in the space between the development and residential houses was an increase and was welcomed.
- It was noted that the application had been to pre application stage and the applicant had made sure to adhere to the feedback provided.
- There was a need for more family homes within the borough.
- There was some concern of the shape of the house which appeared slightly squashed.
- There was still a need for hotels however there was also a great need for more family home units.
- There was some concern over the size of some of the units which were smaller than some members would have liked.
- The development did not fit in with the character of the local area despite the scheme being policy compliant.

The substantive motion to GRANT the application based on the officer's recommendation, in addition to a condition relating to the requirement for full details on the northern boundary treatment (the height of which should be maintained), and the location of replacement trees along the western boundary was proposed by Councillor Shortland. This was seconded by Councillor Johnson.

The motion to grant the application was taken to a vote and carried with 10 Members voting in favour. The Committee RESOLVED to GRANT the application subject to completion of a legal agreement for the development at Hotel, 22 St Peter's Road, Croydon, CR0 1HD.

42/23 **Other planning matters**

There were none.

43/23 **Weekly Planning Decisions**

The report was received for information.

The meeting ended at 7.31 pm

Signed:

Date:

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PLANNING COMMITTEE AGENDA

PART 5: Development Presentations

1 INTRODUCTION

- 1.1 This part of the agenda is for the committee to receive presentations on proposed developments, including when they are at the pre-application stage.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 The following information and advice applies to all those reports.

2 ADVICE TO MEMBERS

- 2.1 These proposed developments are being reported to committee to enable members of the committee to view them at an early stage and to comment upon them. They do not constitute applications for planning permission at this stage and any comments made are provisional and subject to full consideration of any subsequent application and the comments received as a result of consultation, publicity and notification.
- 2.2 Members will need to pay careful attention to the probity rules around predisposition, predetermination and bias (set out in the Planning Code of Good Practice Part 5.G of the Council's Constitution). Failure to do so may mean that the Councillor will need to withdraw from the meeting for any subsequent application when it is considered.

3 FURTHER INFORMATION

- 3.1 Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

4 PUBLIC SPEAKING

- 4.1 The Council's constitution only provides for public speaking rights for those applications being reported to Committee in the "Planning Applications for Decision" part of the agenda. Therefore reports on this part of the agenda do not attract public speaking rights.

5 BACKGROUND DOCUMENTS

- 5.1 For further information about the background papers used in the drafting of the reports in part 8 contact Mr P Mills (020 8760 5419).

6 RECOMMENDATION

- 6.1 The Committee is not required to make any decisions with respect to the reports on this part of the agenda. The attached reports are presented as background information.

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PLANNING COMMITTEE AGENDA

PART 6: Planning Applications for Decision

1 INTRODUCTION

- 1.1 In this part of the agenda are reports on planning applications for determination by the Planning Committee.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 Any item that is on the agenda because it has been referred by a Ward Member, GLA Member, MP or Resident Association and none of the person(s)/organisation(s) or their representative(s) have registered their attendance at the Town Hall in accordance with the Council's Constitution (paragraph 3.8 of Part 4K – Planning and Planning Sub-Committee Procedure Rules) the item will be reverted to the Director of Planning and Strategic Transport to deal with under delegated powers and not be considered by the committee.
- 1.4 The following information and advice applies to all reports in this part of the agenda.

2 MATERIAL PLANNING CONSIDERATIONS

- 2.1 The Committee is required to consider planning applications against the development plan and other material planning considerations.
- 2.2 The development plan is:
 - the London Plan (2021)
 - the Croydon Local Plan (2018)
 - the South London Waste Plan (2022)
- 2.3 Decisions must be taken in accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. Section 70(2) of the Town and Country Planning Act 1990 requires the Committee to have regard to the provisions of the Development Plan, so far as material to the application; any local finance considerations, so far as material to the application; and any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Committee to make its determination in accordance with the Development Plan unless material planning considerations support a different decision being taken. Whilst third party representations are regarded as material planning considerations (assuming that they raise town planning matters) the primary consideration, irrespective of the number of third party representations received, remains the extent to which planning proposals comply with the Development Plan.
- 2.4 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects listed buildings or their settings, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest it possesses.

- 2.5 Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a conservation area, the local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 2.6 Under Section 197 of the Town and Country Planning Act 1990, in considering whether to grant planning permission for any development, the local planning authority must ensure, whenever it is appropriate, that adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.
- 2.7 In accordance with Article 31 of the Development Management Procedure Order 2010, Members are invited to agree the recommendations set out in the reports, which have been made on the basis of the analysis of the scheme set out in each report. This analysis has been undertaken on the balance of the policies and any other material considerations set out in the individual reports.
- 2.8 Members are reminded that other areas of legislation covers many aspects of the development process and therefore do not need to be considered as part of determining a planning application. The most common examples are:
- **Building Regulations** deal with structural integrity of buildings, the physical performance of buildings in terms of their consumption of energy, means of escape in case of fire, access to buildings by the Fire Brigade to fight fires etc.
 - Works within the highway are controlled by **Highways Legislation**.
 - **Environmental Health** covers a range of issues including public nuisance, food safety, licensing, pollution control etc.
 - Works on or close to the boundary are covered by the **Party Wall Act**.
 - **Covenants and private rights** over land are enforced separately from planning and should not be taken into account.

3 ROLE OF THE COMMITTEE MEMBERS

- 3.1 The role of Members of the Planning Committee is to make planning decisions on applications presented to the Committee openly, impartially, with sound judgement and for sound planning reasons. In doing so Members should have familiarised themselves with Part 5D of the Council's Constitution 'The Planning Code of Good Practice'. Members should also seek to attend relevant training and briefing sessions organised from time to time for Members.
- 3.2 Members are to exercise their responsibilities with regard to the interests of the London Borough of Croydon as a whole rather than with regard to their particular Ward's interest and issues.

4. THE ROLE OF THE CHAIR

- 4.1 The Chair of the Planning Committee is responsible for the good and orderly running of Planning Committee meetings. The Chair aims to ensure, with the assistance of officers where necessary, that the meeting is run in accordance with the provisions set out in the Council's Constitution and particularly Part 4K of the Constitution 'Planning and Planning Sub-Committee Procedure Rules'. The Chair's most visible responsibility is to ensure that the business of the meeting is conducted effectively and efficiently.
- 4.2 The Chair has discretion in the interests of natural justice to vary the public speaking rules where there is good reason to do so and such reasons will be minuted.

- 4.3 The Chair is also charged with ensuring that the general rules of debate are adhered to (e.g. Members should not speak over each other) and that the debate remains centred on relevant planning considerations.
- 4.4 Notwithstanding the fact that the Chair of the Committee has the above responsibilities, it should be noted that the Chair is a full member of the Committee who is able to take part in debates and vote on items in the same way as any other Member of the Committee. This includes the ability to propose or second motions. It also means that the Chair is entitled to express their views in relation to the applications before the Committee in the same way that other Members of the Committee are so entitled and subject to the same rules set out in the Council's constitution and particularly Planning Code of Good Practice.

5. PROVISION OF INFRASTRUCTURE

- 5.1 In accordance with Policy 8.3 of the London Plan (2011) the Mayor of London has introduced a London wide Community Infrastructure Levy (CIL) to fund Crossrail. Similarly, Croydon CIL is now payable. These would be paid on the commencement of the development. Croydon CIL provides an income stream to the Council to fund the provision of the following types of infrastructure:
- i. Education facilities
 - ii. Health care facilities
 - iii. Projects listed in the Connected Croydon Delivery Programme
 - iv. Public open space
 - v. Public sports and leisure
 - vi. Community facilities
- 5.2 Other forms of necessary infrastructure (as defined in the CIL Regulations) and any mitigation of the development that is necessary will be secured through A S106 agreement. Where these are necessary, it will be explained and specified in the agenda reports.

6. FURTHER INFORMATION

- 6.1 Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

7. PUBLIC SPEAKING

- 7.1 The Council's constitution allows for public speaking on these items in accordance with the rules set out in the constitution and the Chair's discretion.

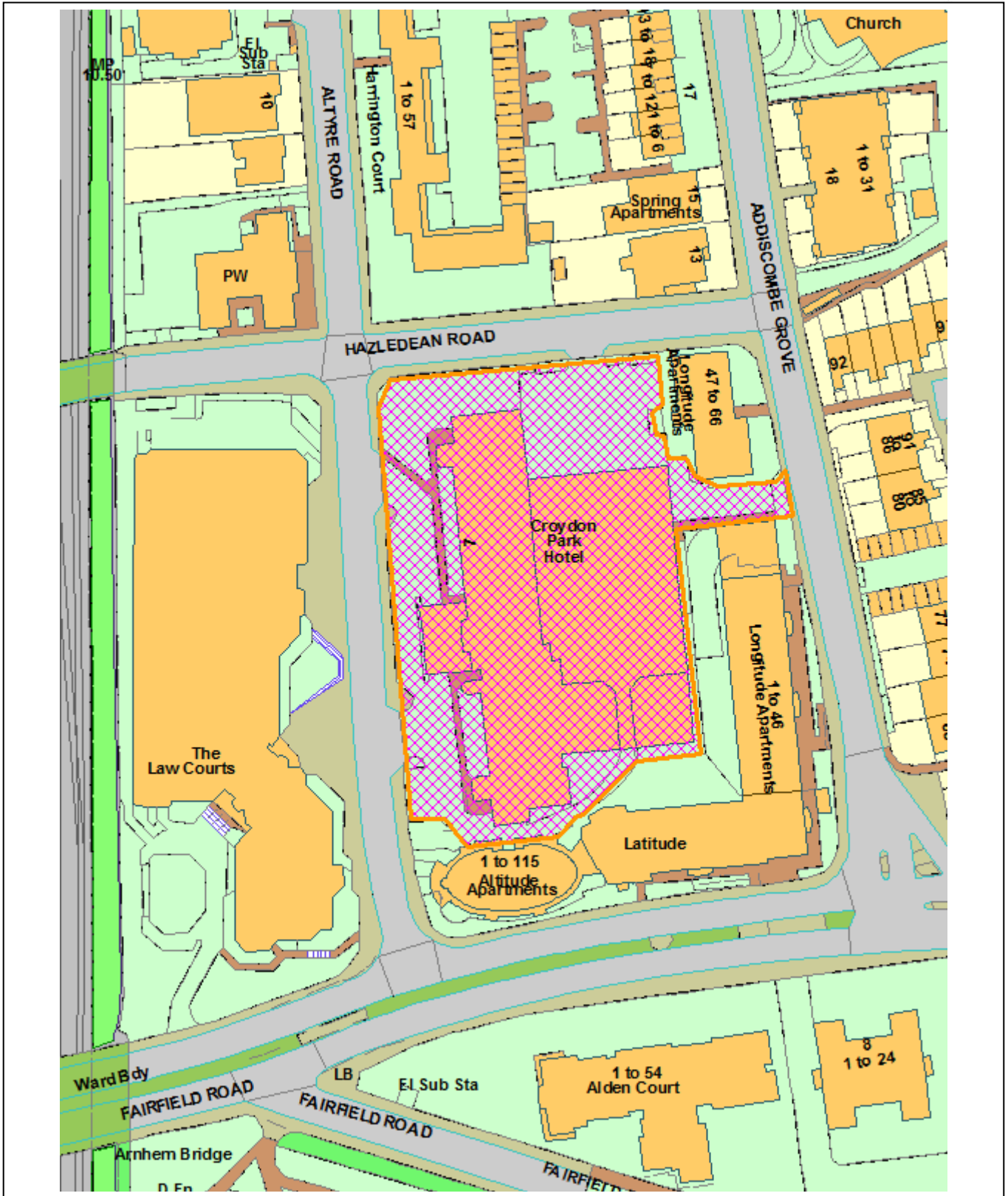
8. BACKGROUND DOCUMENTS

- 8.1 The background papers used in the drafting of the reports in part 6 are generally the planning application file containing the application documents and correspondence associated with the application. Contact Mr P Mills (020 8760 5419) for further information. The submitted planning application documents (but not representations and consultation responses) can be viewed online from the Public Access Planning Register on the Council website at <http://publicaccess.croydon.gov.uk/online-applications>. Click on the link or copy it into an internet browser and go to the page, then enter the planning application number in the search box to access the application.

9. RECOMMENDATION

- 9.1 The Committee to take any decisions recommended in the attached reports.

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1 APPLICATION DETAILS

Ref: 23/00872/FUL
 Location: Croydon Park Hotel, 7 Altyre Road, Croydon, CR9 5AA
 Ward: Addiscombe West
 Description: Demolition of the existing buildings and retention of the existing basement, site preparation and enabling works to allow for the erection of a residential building (Use Class C3) comprising a maximum 447 homes with a maximum height of 36 storeys and community floorspace (Use Class F.1/F.2) on the ground floor, highways and access works, landscaping, car and cycle parking, and other associated works
 Drawing Nos: See Appendix 1
 Applicant: Amro Fleymn Croydon Limited
 Agent: Mark Knibbs of Avison Young
 Case Officer: Georgina Betts

	Housing Mix				
	Studio (1 person)	1 bed (2 person)	2 bed (3 and 4 person)	3 bed (5 and 6 person)	TOTAL
Proposed (Market Rent)	84	106	75	96	361
Proposed (Discount Market Rent)	0	46	22	0	68
Proposed (London Living Rent)	0	0	4	14	18
TOTAL	84 (18%)	152 (34%)	101 (23%)	110 (25%)	447 (100%)

Type of floor space	Amount proposed
Residential (Use Class C3)	44,193sqm (NIA)
Community (Use Class F.1/F.2)	208sqm (NIA)
Total	44,401sqm

Vehicle and Cycle Parking (London Plan Standards)	
PTAL: 6b	
Car Parking maximum standard	Proposed
Car free with 3% disabled provision	13x disabled bays only
Long Stay Cycle Storage minimum	Proposed
775	788
Short Stay Cycle Storage minimum	Proposed
13	13

1.1 This application is being reported to committee because:

- The ward councillors (Cllr Fitzsimons and Cllr Hay-Justice) made representations in accordance with the Committee Consideration Criteria and requested committee consideration.

- Objections above the threshold in the Committee Consideration Criteria have been received.
- It is a residential development containing 200 or more new dwellings.

2 RECOMMENDATION

- 2.1 That the Committee resolve to GRANT planning permission
- 2.2 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission subject to:
- A. Any direction by the London Mayor pursuant to the Mayor of London Order
- B. The prior completion of a legal agreement to secure the following planning obligations:

Housing

- Build to Rent criteria, including covenant, clawback mechanism and management
- Secure 20% affordable housing (by habitable room) as 30% London Living Rent (LLR) level and 70% as Discount Market Rent (DMR) level
- Affordable housing review mechanisms (early and late-stage reviews)

Transport

- Sustainable Transport financial contribution of £491,700 (to include improvements to Barclay Road pedestrian crossing)
- Transport for London (TfL) financial contribution of £550,000
- Provision of a car club bay (with EVCP) to Hazledean Road
- Car club membership for every home for 3 years
- Restriction on residential parking permits in Controlled Parking Zone (CPZ) and in town centre car parks
- Travel plan and monitoring

Public Realm

- Enter into a S. 38 and 278 highways agreement to secure the following:
 - Resurfacing of public footpath on all pavements around the site
 - New layby to Altyre Road (with pedestrian footpath inset into application site and then adopted)
 - Removal of redundant dropped kerbs
- Tree planting to Altyre Road (a minimum of 7 trees) secured through financial obligation of £7,840.

Design

- Architect retention clause
- Financial contribution of £10,892 for off-site play space for over 12-year-olds
- Public art clauses – location defined and a) brief and section agreed with LPA b) final strategy agreed with LPA and c) implementation

Environmental

- Carbon offsetting financial contribution of £315,164 (subject to review if the energy performance improves during the detailed design stages)
- 'Be Seen' monitoring clause
- Air quality financial contribution of £44,700
- TV signal mitigation measures

Employment and Training

- Local Employment and Training strategy (LETS)

- t) LETS construction phase financial contribution of £100,000 and operational contribution of £6,770.00

Other

- u) Community space management plan (how the space will be marketed, what will be provided in the space and reporting on an annual basis which groups use it, as well as a commitment to making the space is available to rent at a subsidized rate of 50% below market value for 15 hours per week for charities or community groups in Croydon)
- v) Community use agreement
- w) Relevant monitoring fees (per £1,500 per obligation above)

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) Commencement time limit of 3 years
- 2) Carried out in accordance with the approved drawings
- 3) Development to have 447 homes (Use Class C3) across all buildings at heights of 9, 33 and 36 storeys

Pre-commencement (pre-demolition)

- 4) Demolition and Construction Logistics Plan (discharged in consultation with TfL and London Trams)
- 5) Demolition and Construction Environment Management Plan
- 6) Submission of a Piling Method Statement

Pre-commencement (post-demolition)

- 7) Public Art strategy, designs and implementation (brief and commissioned pieces for elevations including physical samples)
- 8) Wind mitigation in relation to ground entrance and the 33rd floor roof top amenity area
- 9) Sustainable urban drainage strategy
- 10) Intrusive site investigation

Prior to above ground floor slab level

- 11) Typical façade materials and detailing 1:1 mock-up's, with 1:5/1:10 details to confirm following approval
- 12) 1:1 mock-up's of the crown, showing interface, and of the amenity levels and window/sill details
- 13) External facing materials, including physical samples and detailed drawings of design elements 1:5/1:10
- 14) Building lighting scheme, to include night-time illumination and wildlife sensitive lighting design
- 15) Achieve Secured by Design accreditation
- 16) Vehicle Dynamics Assessment with hostile vehicle mitigation and anti-terrorist measures
- 17) Sufficient ducting space for full fibre connectivity infrastructure
- 18) Air Quality and Dust Management Plan
- 19) Final details of cycle parking

20) Details of aviation lights to the top of the two interlocking towers

Pre-occupation

- 21) Hard and soft landscaping (including planting / boundary treatment, furniture and structures / play space / equipment and rooftop amenity)
- 22) Urban Greening Factor to result in a minimum of 0.4 (scheme achieves 0.42)
- 23) Communal area management plan stipulating access to all communal areas (rooms and outside space) for all residents within both blocks
- 24) Detailed Delivery and Servicing Plan
- 25) Refuse Collection Management Plan
- 26) Building maintenance strategy including window cleaning
- 27) Parking Design and Management Plan (including details of the maintenance of the electronic gates and traffic light system utilised)
- 28) Community use cycle parking review for use of facilities and spaces within the basement
- 29) Development in accordance with WLC assessment and post-construction assessment to review emissions against submitted report
- 30) Development in accordance with Circular Economy assessment and post-construction assessment to review against submitted report
- 31) Travel Plan
- 32) Building fully accessible to all with step free access and evacuation lifts provided
- 33) Confirmation that either all water network upgrades required to accommodate the additional demand to serve the development have been completed or a development and infrastructure phasing plan agreed (from Thames Water)
- 34) Wind mitigation provided as specified

Compliance

- 35) 10% of units build to Part M4(3) and 90% to Part M4(2) of the Building Regulations
- 36) Access for all residents (across all tenures) throughout all buildings (being the Tower, Villa and Mansion Blocks) provided and maintained in perpetuity
- 37) Compliance with measures in Noise and Vibration Assessment August 2023
- 38) Noise from air and plant units should not increase background noise
- 39) Securing biodiversity mitigation and enhancement measures within Biodiversity Net Gain Statement August 2023
- 40) Minimum 35% CO2 reduction secured on site
- 41) Compliance with Air Quality Assessment March 2023 and the letter of conformity dated August 2023
- 42) Compliance with Energy and Overheating Assessment August 2023
- 43) 110 litre/person/day water consumption target
- 44) All car parking spaces equipped with electric vehicle charging infrastructure
- 45) Compliance with fire statement and detailed design of fire strategy
- 46) All features and materials must comply with Part B of the Building Regulations in relation to fire safety
- 47) Obscure glazing to the south facing windows of Tower and north facing windows of Mansion Block
- 48) Compliance with the Television and Radio Signal Survey and Reception Impact Assessment
- 49) Community use as Use Class F.1/F.2 in perpetuity
- 50) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Granted subject to a Section 106 Agreement
- 2) Community Infrastructure Levy

- 3) Material/detailing conditions information
- 4) Code of practise for Construction Sites
- 5) Site notice removal
- 6) Thames Water guidance related to working near or diverting assets
- 7) Thames Water Groundwater Risk Management permit info
- 8) Thames Water Minimum pressure and flow rates
- 9) Obstacle lighting (Aviation)
- 10) CAA Crane Notification (Aviation)
- 11) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.5 That the Committee confirms that it has paid special attention to the desirability of preserving or enhancing the character and appearance of the Chatsworth Road and Central Croydon Conservation Areas as required by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.6 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

2.7 That, if within 3 months the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal is for full planning permission for:

- Demolition of existing hotel structures with the basement retained
- Site preparation and enabling works
- Construction of two buildings (the Towers/Villa and the Mansion Block) with a shared basement and ground floor level
- Building heights ranging between 9 storeys (Mansion Block) to 36 storeys (highest part of The Towers)
- Delivery of 447 residential homes (Use Class C3) as Build to Rent
- 208sqm of community floorspace (Use Class F.1/F.2)
- Highways/access works, landscaping, car (disabled parking only), cycle parking, and other associated works.

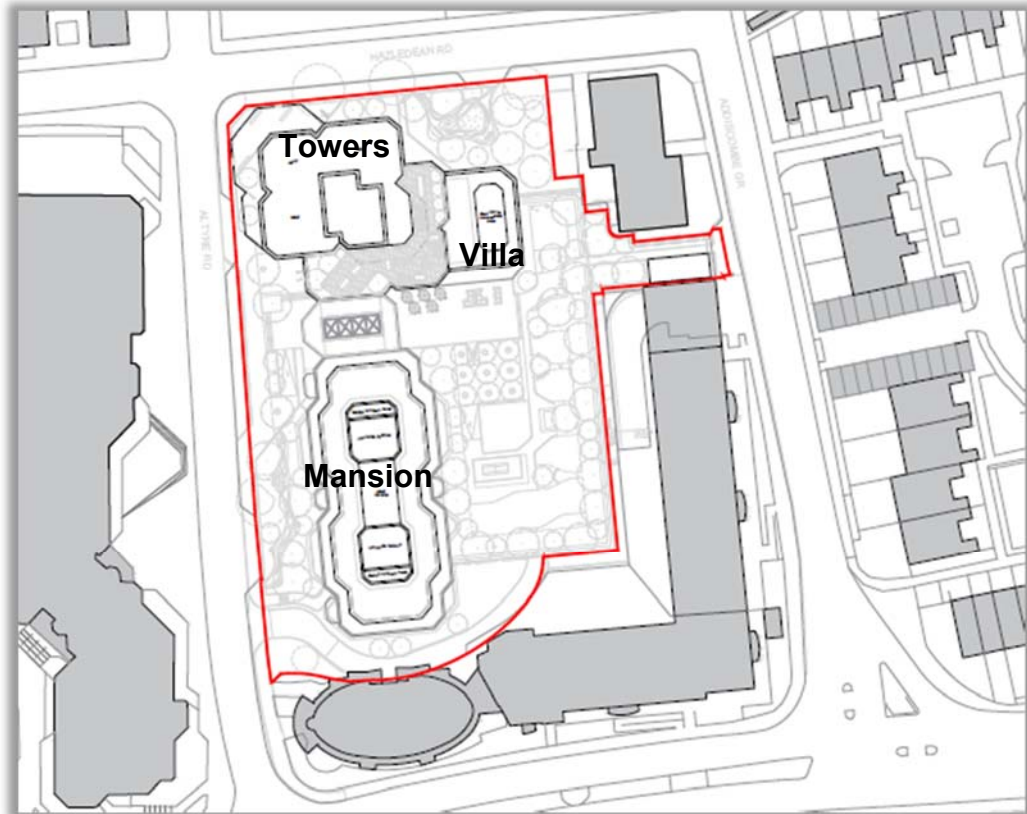


Figure 1: proposed site layout plan

Towers

- Located on the north-western corner of the application site
- The interlocking tower forms are at a height of 33 and 36 storeys
- A 208sqm community floor space on the ground floor to the north-eastern section of the floor plate
- Residential communal amenity spaces on the ground floor and 33rd floor of the tower including a gym, bar area and roof terrace. All units across the development have access to these spaces within the Towers.

Villa Block

- Located to the north-eastern corner of the site and is attached to the two interlocking towers to the west
- The Villa has a total height of 9 storeys, set back by approximately 17 metres from Hazledean Road to the north
- Multi-functional residential amenity is provided on the ground floor area

Mansion Block

- Located to the south end of the application site and is visually detached from the interlocking towers with a single storey glazed greenhouse link at ground floor level only
- The Mansion Block has a total height of 9 storeys and sits adjacent to the 9 storey blank façade of Altitude 25
- Balconies are provided on both the eastern and western elevations
- Vehicular access would be maintained to the south of The Mansion Block as per the current basement access arrangements to the hotel use

Outdoor/Amenity space

- The development provides a series of external spaces, comprising a communal courtyard garden of 1,802sqm, a pocket garden of 454sqm, a communal roof

terrace of 273sqm, and improved public realm areas of 1,022sqm totalling 3,351sqm

- An urban greening factor of 0.42 is achieved on site
- On site play space is provided for 0-5 and 6-12 year-olds with an offsite contribution secured for children over 12

Amendments

3.2 During the course of the application assessment significant amendments to the scheme were secured as a result of officer feedback. A re-consultation exercise took place on 23rd August 2023.

3.3 The improvements broadly comprise:

Design

- Reduction in height of the Towers from 39/38 storeys to 36/33 storeys.
- Reduction in the number of proposed units from 455 to 447 Build to Rent homes.
- Reduction in height of the Villa Block from 12 to 9 storeys.
- Reduction in height of Mansion Block by 600mm.
- Increase in dual aspect homes (7% increase from submission).
- Separation distances between the Towers and Mansion Block increased to 10m (originally 9m at submission).
- The Towers form has developed and been accentuated through the use of shadow gaps, contrasting colours, material and texture refinement.
- The Towers form refined/articulated to improve slenderness.
- The Mansion Block plan has been refined to reduce its length and width.
- The Mansion Block corridors have been straightened, reduced in length and made more generous in width.
- Residential entrance space relocated to the greenhouse.
- Increase of community room size by 120sqm and relocation to prominent position on Hazledean Road frontage.

Public Realm

- Resurfacing of public footpath on all pavements around the site
- Contribution towards junction crossings to Park Hill Park
- Tree planting along Hazledean and Altyre Road.
- Creation of a pocket garden to north of the Villa.
- Public realm increased by 376sqm along Altyre Road and Hazledean Road (totalling approximately 1,570sqm) through:
 - Villa Block separation from Hazledean Road increased by 1.2m (so 7m to edge of site)
 - Towers separation from Altyre Road increased by 1.5m (so 7.2m to edge of site)
 - Mansion Block separation from Altyre Road increased by 2.4m (so 13.3m to edge of site)

Neighbouring and Future Residents' Impact

- Higher Vertical Sky Component pass rate on surrounding residential properties (8% increase from planning submission) and similar uplift in the daylight performance of the proposed homes (7% increase from planning submission).
- Villa Block shifted south to provide 18m separation from Longitude Apartments.
- Separation distances between the proposed development the flats at Altitude 25 and Longitude apartments increased.

Transport/Serviceing

- Basement car parking area reduced in size by circa 450sqm with 3% wheelchair parking provision.
- Cycle access improved via dedicated cycle access lift from Altyre Road to basement level.



Figure 2: CGI of the proposed scheme

Site and Surroundings

- 3.4 The existing site currently houses a large purpose-built hotel which is currently vacant. Croydon Park Hotel opened in 1984 and was previously operated under an international hotel brand. In recent years the hotel has closed and become disused and dilapidated. The building comprises two sections; the primary accommodation block is constructed over ground and five upper floors, with the second block built over two floors comprising both front and back of house facilities.
- 3.5 A public car park is provided partially at ground level and within the basement of the existing hotel, providing 87 parking bays.
- 3.6 The site is located approximately 200m south of East Croydon Station, on the south-eastern corner of Altyre Road and Hazledean Road. The site forms part of an existing perimeter block with the site directly to the south occupied by Altitude 25, a 25 storey residential tower, with lower elements to the east known as Latitude Apartments. Latitude Apartments turn the corner of Barclay Road and extend up Addiscombe Grove, falling in height to 4 storey. The final building in the block is Longitude Apartments, a 5 storey building on the corner between Addiscombe Grove and Hazledean Road.
- 3.7 The surrounding streets to the east are predominantly residential buildings of 2-4 storeys, with Croydon Crown Court located directly opposite on Altyre Road and the large Park Hill Park to the south off Barclay Road.



Figure 3: aerial photograph of site in context



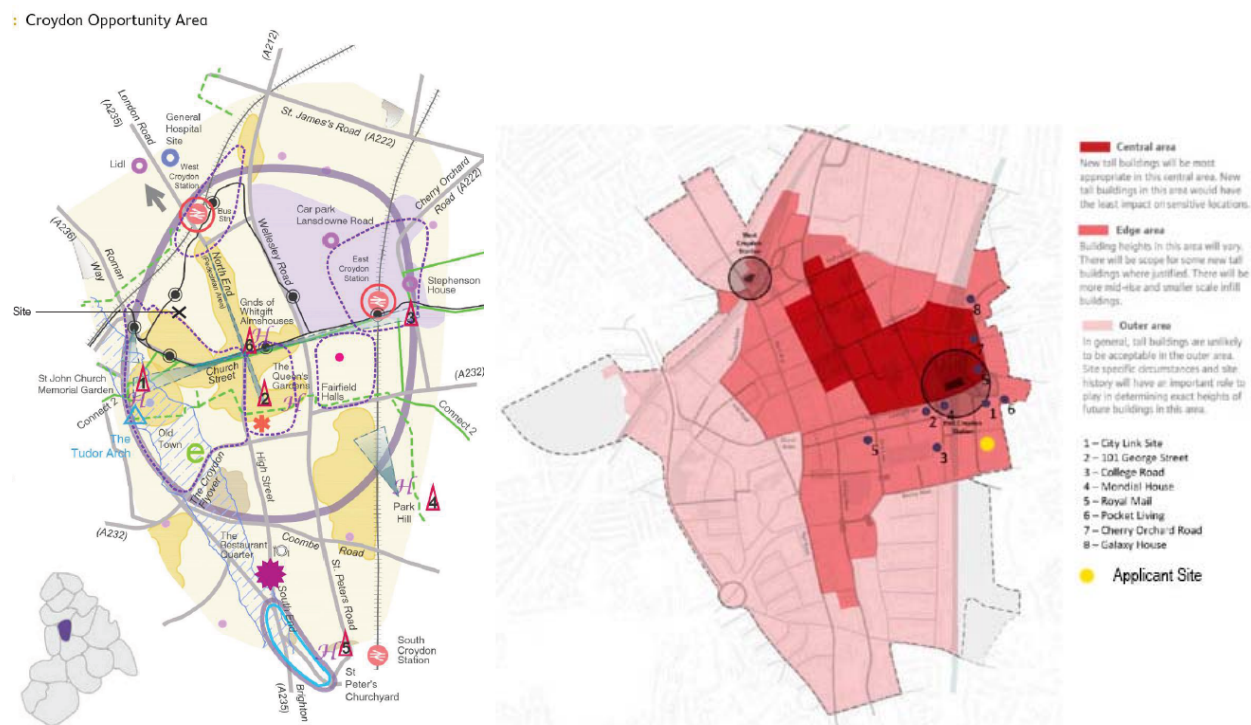
Figures 4 and 5: birds eye views of the existing hotel building

3.13 The surrounding area towards East Croydon Station contains a wide variety of building types and scale, with a number of tall buildings either under construction or benefiting from planning permission. College Tower (19/04987/FUL) is nearing completion on site, which is part 49 and part 34 storey tower and Ten Degrees (17/04201/FUL) part 38 and part 44 storey in height. It is also important to note the Citylink scheme (21/02912/FUL) for a part 14 storey and part 28 storey building with basement, comprising 498 co-living units and 84 residential units. this was refused permission on grounds of impact on the NLA Tower; this decision was allowed on appeal by the Planning Inspectorate. This is located 90m to the north of the application site.

Planning Designations and Constraints

3.14 The site is located within the Croydon Opportunity Area (so policy DM38 applies) and within the 'Edge Area' for tall buildings (See *Images 4 and 5: Extracts from Croydon Local Plan 2018*). The site has excellent Public Transport Accessibility (PTAL 6B), being

in close proximity to East Croydon Station and numerous bus and tram links. The site in totality is at a 1 in 100 year and a 1 in 1,000-year risk of surface water flooding and is at risk of ground water flooding.



Figures 6 and 7: Extracts from Croydon Local Plan 2018

3.15 All of the roads around the site are within the Central Croydon CPZ. The site is not subject to a Tree Preservation Order although there are a number of established trees towards to the northern boundary. The site lies near to the Chatsworth Road Conservation Area (approximately 74m to the south of the site), the Central Croydon Conservation Area (approximately 400m to the west of the site) and the NLA Tower which is a locally listed building (approximately 127m to the north of the site).

Planning History

3.16 The following planning decisions are relevant to the application:

92/00968/P Erection of five/six/seven storey hotel extension comprising 115 bedrooms, syndicate and function rooms and additional underground parking for 37 cars; erection of 2/3 storey and 4 storey buildings comprising 1 two bedroom, 13 one bedroom and 24 studio flats with underground parking for 45 cars. **Permission Granted and Implemented.**

97/01367/P Alterations; erection of two single storey ground floor extensions to include installation of rotary and automatic doors. **Permission Granted and Implemented.**

21/06269/PRE To demolish the existing buildings. To erect buildings to provide approximately 550 residential units, internal and external amenity space, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and associated works. **Pre-application scheme that was presented to Place Review Panel and came to Planning Committee as a developer**

presentation (see below). Officers had concerns with a number of aspects of the scheme.

22/04535/ENVS Environmental Impact Assessment (EIA) Screening Opinion Request for the demolish all structures on site and construct two new buildings (linked by basement and ground floor) with the tallest building up to a maximum 43 storeys. The Proposed Development will provide: Up to approximately 500 residential Build to Rent dwellings within three building blocks, Accessible parking spaces incorporating active or passive EV charging, Bicycle parking facilities and new landscaping and publicly accessible formal and informal play space, new tree planting and quality hard landscape areas at ground floor level. **EIA Not Required.**

Pre-Application background (21/06269/PRE)

Place Review Panel 1 (PRP)

- 3.17 An early iteration of the scheme was presented to the Council's PRP in October 2022. This version of the scheme was for the erection of a part 31/36/39 storey tower, a 10 storey linear block and 6 storey villa block comprising approximately 430 Built to Rent units and associated parking, servicing, amenity spaces, landscaping and public realm works.



Figures 8, 9, 10 and 11: proposal presented to PRP in October 2022

- 3.18 The Panel were very concerned with the tower's height and width and the lack of private amenity, as well as the mansion block's height and distance from Altitude 25. They felt there was potential to link the scheme better into the cluster of tall buildings to the west of the railway line, but that there should also be a distinction from them. The Panel felt that the public realm was of critical importance to make the scheme attractive for over 1,000 people. The Panel encouraged the applicant to think more about the users of the building and the sense of community and shared amenity spaces. A summary of comments and key recommendations are provided below:

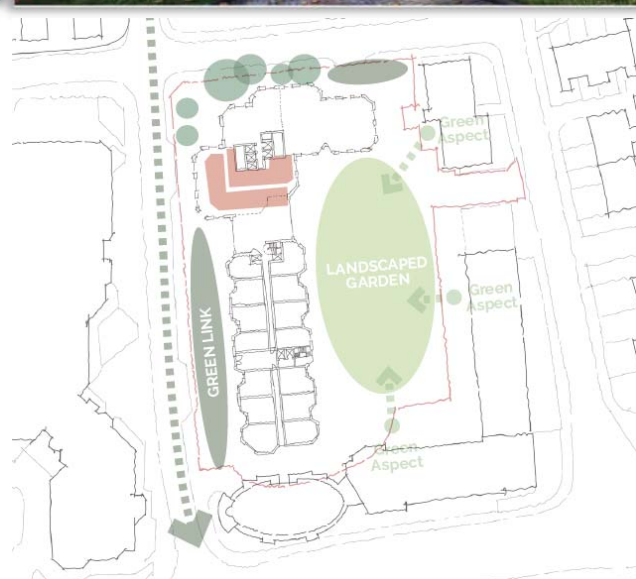
- Need to revisit the principles that guide the design and massing with sufficient assessment of the environmental and townscape impacts.
- Specific commitments to energy need to be detailed with specification.
- More external private balcony space for fresh air and sitting out for residents.
- Strongly recommended lowering the height of the tower due to its “Edge” location by 10 storeys and of the mansion block to a maximum of 9 storeys considering the 9 storey flank of Altitude 25.
- Strongly advocated for significantly increasing the proportion of dual aspect units and the redistribution of some family units into the mansion block.
- Recommend revisiting the form and function of the corner entrance area to be more public and sociable.
- Natural daylight to the tower core and all cores is vital and essential.
- Emphasised the need to have some bike storage on the ground floor.
- Advised that improvements to the public realm would enhance the pedestrian experience.

Developer Presentation to Committee

3.19 The scheme was revised and presented to Committee Members on the 16th December 2022. This proposal was to demolish the existing buildings and erect a development to provide approximately 450 residential units (Use Class C3, as Build to Rent), internal and external amenity space, together with associated wheelchair accessible vehicle parking, cycle parking, landscaping, play areas and works.



Figures 12, 13 and 14: views from the north of Altyre Road (left) and from South Park Hill Park to the south (top right), then proposed site plan (bottom right)



3.20 The main issues raised at this meeting by Members of the Committee were as follows:

Principle

- Sorry for loss of much-loved Hotel

- Prime location 200m from East Croydon station
- Do not want site derelict and abandoned
- Loss of employment from loss of hotel
- Need for housing
- Questioned whether student accommodation had been considered
Officer response: There is no protection for the existing hotel use, so the principle of its loss and a residential redevelopment is supported. There is currently no identified need for purpose built student accommodation, so this matter was not pursued by Officers.

Height

- Site can take some height, but a concern at this height could set a precedent
- Concerned not part of the cluster of tall buildings, distinction between sides of the railway line
- Height more akin to NLA Tower, Altitude 25 and Pocket could be more appropriate
- *Officer response: Officers agree that the site could accommodate a tall building. The scheme has been reduced in overall height terms, but officers acknowledge it remains taller than NLA Tower, Altitude 25 and Pocket.*

Design

- Should not compete with NLA Tower
- Materiality competes, should consider a softer palette
- Contrast between surroundings is too much of a change
- Needs to relate better to Pocket and Altitude 25
- Questions around terracotta and materials
- Balcony materials important - linked to privacy
- Relationship between blocks successful and design works
Officer response: The proposed development does not compete with the NLA tower given the separation distance and the contrasting material palette. The scheme takes cues from surrounding buildings in terms of detailing which respect the architectural style of the NLA tower and nearby new buildings known as Ten Degrees and College Tower. The contrasting materials are supported by officers, explained later in the design section of the report.

Affordable housing

- Questions around location, type, service charges, use of facilities and maintenance and whether secured in perpetuity
- Questioned where 20% has come from and need for viability to have been worked through
Officer response: The affordable housing units would be pepper potted throughout the scheme, with access to all facilities and maintenance controlled through unified ownership and management of the private and affordable elements of the scheme. The 20% affordable housing has been tested under the viability tested route; officers have reviewed the final FVA alongside independent advice and concur with the applicants' findings that the 20% offer is the maximum reasonable affordable housing provision.

Mix and standard

- Questioned mix beyond family provision - seems high proportion of one-bed
- Dual aspect units important
- Questions around Build to Rent experience of the developer
- Pollution from the road and impact for future occupiers
- Spaces needed for different uses, including prayer and disabled/elderly

Officer response: The applicant has now increased the number of family units and now stands at 25% which is in excess of the 20% policy requirement. The number of dual aspect units have increased.

Residential impact

- Residents concerned about what is coming forward
- Questioned how the scheme has amended through consultation
- Questions around microclimate and noise
- Daylight and sunlight impacts need to be considered, bearing in mind lower rise in Altyre Road
- Relationship to Altitude 25 important

Officer response: Details in 3.3 and 3.23 show how the scheme has been amended prior to submission and during the course of the application process. Microclimate including wind and daylight/sunlight impacts have been independently verified by the Councils expert consultants and covered in detail in the main body of this report.

Public realm

- Generosity of pavement and public realm needed
- Welcome public realm approach of green link and tree retention
- Links to Park Hill should be improved - suggestion of working with Park Hill community groups
- Blue infrastructure important

Officer response: Officers have worked with the applicant's team to set the buildings deeper into the site to provide more generous public realm and green link, as well as a contribution towards improvement to the Barclay Road pedestrian crossing into park Hill. Full details are addressed in more detail below.

Other

- Car parking numbers and impact on congestion
- Refuse and bulky items need to be factored in
- Support the sustainability approach
- Questioned the name of the development

Officer response: The proposal is car free with the exception of 3% disabled parking provision that will be provided within the basement area. Refuse arrangements have been worked through and covered in detail below, as well as sustainability credentials. The question of the scheme is not a planning matter.

PRP2

- 3.21 The proposal was further amended and presented to a second PRP in January 2023, this time for the erection of a part 39/38 storey tower with a 12 storey shoulder, plus a 9 storey linear block comprising approximately 453 Built to Rent units and associated parking, servicing, amenity spaces, landscaping and public realm works.



Figures 15, 16, 17 and 18:
 site layout at part of PRP 2 (top left and right)
 January 2023 visual from Barclay Road (left)
 January 2023 visual, north of Altyre Road (below)



3.22 The Panel were very concerned with the height of the tower and the appendage block, the eastern boundary treatment and landscaping, articulation of the mansion block, and the impact of wind to pedestrians and sunlight losses to the flats to the north. A summary of comments and key recommendations are given below:

- The definition of dual aspect needs to be clarified and adhered to.
- Need to account for microclimate analysis to inform the design particularly at street level to create a welcoming space that is comfortable to socialise in and sit out in and be pleasant all year round.
- Emphasised the need to be convinced of the robustness of the public realm.

- Recommend lowering the height of the tower due to its “Edge” location and of the appendage block, due to its increased negative impact on the flats across the street.
- Recommend revisiting the massing and architectural expression of the mansion block to appear less bulky and of the corner of the tower to be more generous within the public realm.
- Advised that clarity is needed on the eastern landscape and boundary treatment, as well as the access route from Hazledean Road.
- Good design is what Croydon Council is looking for.

3.23 A number of key changes have been made to the scheme following PRP and Planning Committee feedback, as well as ongoing dialogue with officers both before and during the assessment of the application, are summarised below:

- Reduction in the height of the towers from 36/39 storey to 33 and 36 storey.
- Reduction in the height of the Villa from 12 storey to 9 storey.
- Reduction in the height of the Mansion Block from 12 storey to 9 storey.
- Increase in the depth of the public realm to Altyre Road by approx. 1.8m.
- Creation of a pocket park to the northeast.
- Car free except for 3% disabled parking
- Reduction in the number of units from 455 to 447
- Greater separation between the Towers and the Mansion Block with further details provided in terms of the materiality of the balconies.
- Number of dual aspect units has been increased which single north facing units have been provided with ‘enhanced’ outlooks as a result in the elbows of the façade.
- Air quality has been addressed and Officers of the Council are satisfied with the results of the surveys.
- Multi-functional communal amenity space is now provided on the ground and 33rd floor of the towers.
- A commitment from the applicant to contribute to improvements to the footway and pedestrian crossing to Barclay Road including the planting of street trees.
- Refuse matters have been resolved with a servicing layby provided on Altyre Road and refuse chutes provided throughout the development which will be managed by the operations team.
- Whilst not a planning matter, the name of the development has changed from the ‘Lilibet’ to ‘Botanical House’.

3.24 The key changes secured during the course of the planning application determination period are summarised in paragraph 3.3.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The principle of two intersecting Towers (33/36 storeys), Villa Block (9 storeys) and Mansion Block (9 storeys) comprising residential accommodation is supported and aligns with the desire for growth in the Croydon Opportunity Area and Metropolitan Centre.
- The principle of a 208sqm unit secured for community use (Use Class F.1/F.2) is supported in this location.
- The proposed development would provide 20% affordable housing by habitable room, which amounts to 86 homes, at a 68 to 18 split between Discounted Market Rent and London Living Rent. This offer has been independently scrutinised and is the maximum reasonable affordable housing policy compliant provision.

- The mix of units is appropriate and includes 25% family accommodation in compliance with the 20% target set out within the Croydon Opportunity Area Framework.
- The application site is situated within an appropriate location for a tall building; the height and mass of the Towers, Villa and Mansion Blocks have been assessed in relation to their impact from a wide range of viewpoints and found acceptable.
- The design, appearance and detailed façade treatment of the development is of high quality as required for tall buildings and would significantly improve the quality of public realm, particularly given the redundant status of the hotel with the introduction of a new pocket garden to the north.
- Officers have sought to limit any heritage harm, with less than substantial harm on heritages assets identified, however, the impact is outweighed by public benefits.
- Whilst there would be harm to the amenities of surrounding occupiers, particularly in relation to daylight and sunlight impacts to the flats within Harrington Court, Latitude and Longitude apartments, these would not be so unduly harmful as to refuse planning permission on this ground.
- The standard of residential accommodation would be acceptable, as all homes would meet the Nationally Described Space Standards. Where private external amenity space is not provided all affected units are suitably oversized while all units would have access to 962sqm of internal and 2,529sqm of external communal amenity areas. All homes would have acceptable outlook, with the majority receiving good lighting levels.
- The proposed development is located in a highly sustainable well-connected location which makes it suitable to be car free, with exception of disabled parking provision. The proposed development would not have an adverse impact on the operation of the highway generally would contribute to highway improvement works secured as part of the legal agreement.
- The environmental impacts, including wind, noise, light, air quality, biodiversity, land contamination and flooding, are acceptable subject to mitigation proposed through a combination of conditions and s.106 agreement.
- Sustainability aspects have been properly assessed and their delivery can be controlled through planning obligations and planning conditions.
- There are no aviation or archaeological impacts. Television mitigation, delivering employment opportunities and crime prevention through design can be secured through conditions and s.106 agreement.

4.1 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

5.2 The following were consulted regarding the application:

Greater London Authority (GLA) (Statutory Consultee)

5.3 A summary of the comments on strategic matters are provided below.

Land use principles: Residential-led redevelopment of this vacant hotel site within the Croydon Town Centre / Opportunity Area is supported.

[Officer comment: The recommendation endorses this position].

Housing: 20% affordable housing is proposed as part of a Build to Rent scheme. The affordable housing would be intermediate Discount Market Rent (DMR) housing, of which, 30% would be at London Living Rent levels and the remaining DMR homes at up to 80% of market rent. GLA officers are currently scrutinising the applicant's FVA. The proposed level of affordable housing is considered to be unacceptable at present in the absence of a verified and agreed viability position and noting the significant size and scale of the development. A Build to Rent management plan, covenant and clawback mechanism would need to be secured.

[Officer comment: LBC officers are now satisfied through extensive testing that the maximum level of affordable housing has been achieved. A Build to Rent management plan, covenant and clawback mechanism would need to be secured through the S.106 agreement].

Urban design: Further information is required in relation to the proposed internal layout and residential quality. The architectural and materials quality of the proposed development is supported. Whilst the proposed tower is in a broadly defined location where tall buildings can be supported, there are a number of concerns regarding the potential environmental impact in terms of wind microclimate conditions which must be addressed to ensure compliance with London Plan Policy D9.

[Officer comment: These matters have now been addressed as part of the amended proposal, Officers at the GLA have met with Council Officers and are now satisfied that this matter has been fully addressed].

Heritage: The application would cause a low level of less than substantial harm to heritage assets which must be outweighed by public benefits at the Mayor's decision-making stage.

[Officer comment: LBC officers agree with GLA officers' assessment of harm and are now satisfied that the public benefits outweigh this harm, with further details have been provided below].

Transport: Standard car parking should be removed from the proposals. Further detail should be provided for the cycle parking and additional servicing options should be considered. A contribution of £550,000 is requested to mitigate the cumulative impact on public transport services.

[Officer comment: The proposal is now car free with the exception of 3% disabled parking in line with TfL's requirement. The financial obligation would be secured via the legal agreement.].

Climate change: The energy, drainage and urban greening strategies are generally supported, subject to certain key details being secured.

[Officer comment: All matters are addressed and can be secured via appropriately worded condition].

GLA Viability Team (part of GLA, who are a Statutory Consultee)

- 5.4 The GLA provided comments in June 2023 based on the initial Financial Viability Assessment (FVA) requesting that a revised FVA should be undertaken assessing the viability on a forward funded approach given the Build to Rent nature of the proposal. The GLA raised concerns with the applicants' inputs in respect of the operational costs, approach to appraisal, yield, costs and fees, fiancé rate, profit, Benchmark Land Value and the overall deficit.

[Officer comment: During the course of the application LBC officers and the applicant met with the GLA to seek to address the concerns raised above regarding the nature of the FVA and the inputs. This resulted in the applicant undertaking a 'Forward Funded' FVA while further evidence was submitted by the applicant to support their assumptions and inputs. No formal response was received from the GLA based on the revised FVA at the time of drafting this report, however, LBC officers have sought independent advice from our viability consultants. This matter is discussed in more detail below, but the conclusion of LBC officers, supported by advice from our viability consultants, is that the 20% affordable housing is the maximum reasonable offer that can be secured. Early and late stage review mechanisms are also recommended].

Transport for London (TfL) (Statutory Consultee)

5.5 Comments were received raising the following concerns:

- a) Healthy Streets – TfL raised concerns regarding wind conditions on the junction of Altyre Road and Hazledean Road
[Officer comment: This matter was raised by the LPAs Wind Consultants and has now been addressed].
- b) Support for the removal of the vehicular access to Hazledean Road supporting the Major's Healthy Streets initiative.
[Officer comment: The recommendation endorses this position].
- c) On-street loading and parking should be reconsidered
[Officer comment: There is no on-street parking and on street loading has been subject to discussions with the Councils highway team of which support can be given].
- d) The removal of the existing surface level car park will reduce the number of vehicle trips, which is welcomed.
[Officer comment: The recommendation endorses this position].
- e) A financial contribution is requested to be secured in the S106. Based on the trip generation presented in the TA a contribution in the region of £550,000 should be secured
[Officer comment: This is recommended in the heads of terms above].
- f) It is proposed to provide 15 disabled persons car parking spaces, which equates to 3% of the total number of dwellings and is accepted. However, a further 39 standard car parking spaces are proposed within the basement.
[Officer comment: Standard parking bays have now been omitted from the proposal and 13 disabled parking spaces has been provided equating to 3%].
- g) This amount of cycle parking meets the minimum standards set out in table 10.2 of the London Plan. A further four Sheffield stands are proposed within the public realm to support the community use, which is accepted.
[Officer comment: The recommendation endorses this position].
- h) Lift access to the basement level cycle parking will be provided. These should be designated cycle lifts, rather than servicing lifts.
[Officer comment: Separate cycle lifts have now been provided].
- i) it appears the proposed inset bay would remove existing on-street car parking. Provided that a minimum 2m clear footway is retained behind the bay, this could be supported. A Delivery and Servicing Plan (DSP) is expected to be secured by condition.
[Officer comment: A condition is recommended].
- j) An outline Construction Logistics Plan (CLP) has been submitted with the application. Further detail should be provided in the detailed CLP, secured by condition.
[Officer comment: A condition is recommended].

Active Travel England (Statutory Consultee)

- 5.6 Active Travel England have stated that the LPA should refer to the comments made by Transport for London, and confirmed they will not provide additional comments within London.

Health and Safety Executive (Statutory Consultee)

- 5.7 Following a review of the information provided in the planning application, the HSE is content with the fire safety design to the extent that it affects land use planning.

Building Control (Consultee)

- 5.8 Building Control reviewed the application in relation to the consideration of fire. They have raised no objection, stating that the design allows for some flexibility at the build stage should any issues arise at the detailed design stage. Officers note that following recent regulatory changes the scheme will be legally required to have obtained the approval of the regulator.

[Officer comment: Conditions are recommended].

Metropolitan Police Service (Design out Crime Officers)

- 5.9 No objection subject to conditions in respect of Secured by Design.

[Officer comment: A condition is recommended].

Network Rail

- 5.10 No objection.

Environment Agency (Statutory Consultee)

- 5.11 Responded stating that no consultation was necessary.

Lead Local Flood Authority (Statutory Consultee)

- 5.12 Have not raised an objection to the proposal subject to the imposition of appropriately worded conditions to address SuDS.

[Officer comment: Conditions are recommended].

Thames Water (Consultee)

- 5.13 Have not objected to the proposal but have raised concerns over water and sewage capacity and have therefore recommended that conditions be attached to any approval.

Historic England (Statutory Consultee)

- 5.14 Have raised no objection and do not consider as conditions to be necessary.

National Air Traffic Services (NATS) Safeguarding (Consultee)

- 5.15 Have not objected subject to details of aviation lights at the top of the towers being secured via condition.

[Officer comment: A condition is recommended].

Civil Aviation Authority (Consultee)

- 5.16 Have not objected subject to details of aviation lights at the top of the towers being secured via condition.
[Officer comment: A condition is recommended].

London Fire Brigade (Consultee)

- 5.17 No response was received as part of the initial consultation period or as part of the consultation following the amendments.

Natural England

- 5.18 Responded stating that no consultation was necessary.

6 LOCAL REPRESENTATION

- 6.1 A total of 638 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site and has also been publicised in the local press. Following the receipt of amendments, a further consultation exercise was carried out in August 2023 and therefore the following comments capture both the initial consultation period and the amended consultation period. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 715 Objecting: 495 Supporting: 215

Neutral comments: 5

- 6.2 The following local groups/societies made representations:

- Croydon Voluntary Action Team Croydon [Supporting]
- Asian Resource Centre [Supporting]
- Legacy Youth Zone [Supporting]
- HM Courts and Tribunals Service [Objecting]
- Park Hill Residents Association (PHRA) [Objecting]

- 6.3 The following Councillors made representations:

- Councillor Sean Fitzsimons [objecting]
- Councillor Patricia Hay-Justice [objecting]

- 6.4 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection	Officer comment
Character and design	Concerns in this respect are covered in paragraphs 8.12-8.43
Overdevelopment	
Scale and height of buildings too great	
Inappropriate colour of materials	
Too many towers in the centre	

Ugly with no design merit	
Neighbouring amenity	Concerns in this respect are covered in paragraphs 8.125-8.166
Too close to neighbouring building at Altitude apartments, smell nuisance from nearby smoke vent	
Loss of daylight/sunlight	
Noise and general disturbance especially during construction works	
Overshadowing and/or visual intrusion	
Increase in anti-social behaviour	
Inaccuracies in the daylight and sunlight reports	
Loss of privacy	
Transport and Highways impacts	Concerns in this respect are covered in paragraphs 8.167-8.193
Increase in localised traffic in a heavily congested area	
Not enough parking	
Busier public transport	
Tress and ecology	Concerns in this respect are covered in paragraphs 8.12-8.43 and paragraphs 8.214-8.229
Loss of trees	
Harm to ecological interests	
Other matters	
Lack of investment in local services	Officer comment: such matters will be address through the CIL contribution and Legal Agreement
Block phone, radio and television signals	Officer comment: such matters will be covered through the use of Planning conditions
Lack of affordable housing	Concerns are covered in paragraphs 8.66-8.80
Greater levels of pollution	Such matters are covered in paragraphs 8.214-8.229 and will also be addressed through financial contribution towards air quality
Wind tunnel effects/impacts	Such matters are covered under paragraphs 8.81-8.166
Lack of private amenity/ shortfall in London Plan internal size requirements/ single aspect units	Such matters are covered under paragraphs 8.81-8.124
Viability needs to be independently reviewed	The viability has been independently reviewed and is covered in paragraphs 8.66-8.80
Loss of gym, pool and meeting area	Such matters are covered under paragraphs 8.2-8.11
Harm to heritage assets such as the NLA tower	Such matters are covered under paragraphs 8.44-8.65
Greater strain on water and waste facilities	Such matters are addressed through appropriately worded conditions, this follows the advice received from Thames Water as a result of the consultation process.

Concerns over the impact of the stability of Altitude 25	Officer Comment: there are no known land stability issues in areas which the impacts arising from the construction phase would subject to building control approval
Overheating	Such matters are covered under paragraphs 8.214-8.229
Creates a transient community	Officer comment: the London Plan supports this type of housing and there is no evidence that Build to Rent creates such communities.
Pollution/air quality	Such matters are covered under paragraphs 8.214-8.229 with financial contributions towards air quality secured via the legal agreement
Increase in flood risk and surface water run-off	Such matters are covered under paragraphs 8.214-8.229 with further details secured via condition. No objection to the principle of the development has been received from the LLFA or EA.
Non-material matters	
Loss of views	Officer Comment: there are no rights to view, the impact upon the adjoining occupiers are covered under paragraphs 8.125-8.166
Devaluation of existing properties	Officer Comment: this is not a material planning consideration.
The ownership of the site and the Council profiteering from the development	The site is no longer a Council Asset as it was sold to the applicant. This is not a material consideration.

Support	Officer comment
	The below matters are noted unless indicated otherwise
This will provide homes for young people who desperately need them/more accessible homes	
Provision of affordable housing	
Regeneration of the area	
More green spaces/public space/children's play areas	
Croydon needs to be a better place; this development would contribute to this aspiration	
Will bring back more businesses	
Creation of more jobs	
Good quality accommodation	
Energy efficiency	
A landmark for Croydon, attracting more talent to the borough	
High quality of accommodation	
Good use of derelict land	
Supports the amendments that have been made since the initial submission	Officers note that a large numbers of objections were received prior to the re-consultation process.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- GG2 Making best use of land
- GG4 Delivering homes Londoners need
- SD1 Opportunity Areas
- SD6 Town centres and high streets
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- H11 Build to rent
- S4 Play and informal recreation
- HC1 Heritage conservation and growth
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- S11 Improving air quality
- S12 Minimising greenhouse gas emissions
- S13 Energy Infrastructure
- S14 Managing Heat Risk
- S15 Water infrastructure
- S16 Digital connectivity infrastructure
- S17 Reducing waste and supporting the circular economy
- S112 Flood risk management
- S113 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T4 Assessing and mitigating transport impacts
- T5 Cycling

- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

- SP2 Homes
- SP4 Urban design and local character
- SP5 Community facilities
- SP6 Environment and climate change
- SP7 Green Grid
- SP8 Transport and communication
- DM1 Housing choice for sustainable communities
- DM10 Design and character
- DM13 Refuse and recycling
- DM14 Public art
- DM15 Tall and large buildings
- DM16 Promoting healthy communities
- DM17 Views and landmarks
- DM18 Heritage assets and conservation
- DM19 Promoting and protecting community facilities
- DM23 Development and construction
- DM24 Land contamination
- DM25 Sustainable drainage systems
- DM27 Protection and enhancing biodiversity
- DM28 Trees
- DM29 Promoting sustainable travel and reducing congestion
- DM30 Car and cycle parking in new development
- DM32 Facilitating rail and tram improvements
- DM33 Telecommunications
- DM38 Croydon Opportunity Area

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated on 5th September 2023, and accompanied by the online Planning Practice Guidance (PPG 2021). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Achieving sustainable development (Chap 2)
- Delivering a sufficient supply of homes (Chap 5)
- Promoting sustainable transport (Chap 9)

- Making effective use of land (Chap 11)
- Achieving well designed places (Chap 12)
- Meeting the challenge of climate change, flooding and coastal change (Chap14)
- Conserving and enhancing natural environment (Chap 15)

SPDs, SPGs and LPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents (including London Planning Guidance) which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- Croydon Opportunity Area Planning Framework (2013)
- Conservation Area General Guidance SPD (2013)
- Central Croydon Conservation Area Appraisal and Management Plan SPD (2014)
- Chatsworth Road Conservation Area Appraisal and Management Plan SPD (2016)
- Waste and Recycling in Planning Policy Document (October 2018)
- Section 106 Planning Obligations in Croydon and their relationship to the Community Infrastructure Levy (2019)
- London Housing SPG (March 2016)
- London Mayoral Affordable Housing SPG: Homes for Londoners (August 2017)
- Circular Economy Statements LPG (2022)
- Sustainable Transport, Walking and Cycling guidance (2022)
- Whole-life Carbon Assessments LPG (2022)
- Characterisation and Growth Strategy LPG (2023)
- Housing Design Standards LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Urban Greening Factor LPG (2023)
- Technical Housing Standards: Nationally Described Space Standard (2015)
- National Design Guide (2021)
- National Model Design Code (2021)

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development
2. Design and impact on character of the area
3. Heritage
4. Housing mix and affordable housing
5. Quality of residential accommodation
6. Impact on neighbouring amenity
7. Access, parking and highway impacts
8. Environmental impact
9. Sustainable design
10. Other planning issues
11. Conclusions

Principle of development

Loss of hotel

- 8.2 Croydon Local Plan SP3.9 states that Croydon Metropolitan Centre will remain the principal location in the borough for office, retail, cultural (including a diverse evening/night-time economy) and hotel activity, and also be the largest retail and commercial centre in South London. Policy SP8.2 states that the Council and its partners will enhance the borough's sub-regional transport role to support its position as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area. Policy E10 of the London Plan promotes visitor accommodation but does not currently protect such uses.
- 8.3 Therefore, residential use on this site can be supported in principle as the existing use a hotel is not 'protected' within the Development Plan.

Loss of car park

- 8.4 Part of the site is currently occupied by a Public Car Park. Policy SP8 of the Croydon Local Plan 2018 states that land used for public transport and land required to facilitate future transport operations will be safeguarded unless alternative facilities are provided to enable existing transport operations to be maintained.
- 8.5 The applicant has undertaken a parking stress survey (outside of school holidays and formal industrial action) which demonstrates that the loss of the public car park would not result in an unacceptable loss of parking spaces across the Croydon Metropolitan Centre. The surveys have been reviewed by Officers and are acceptable.

Residential

- 8.6 The Croydon Local Plan sets out a housing target of 32,890 homes over a 20-year period from 2016-2036 (1,645 homes per year). The London Plan requires 20,790 of those homes to be delivered within a shorter 10-year period (2019-2029), resulting in a higher target of 2,079 homes per year.
- 8.7 The Croydon Local Plan also sets out a target for development on Windfall sites of 10,060 homes (approximately 503 per year). The London Plan requires 6,410 net completions on small sites (below 0.25 hectares in size) over 10 years, with a small sites housing target of 641 per year.
- 8.8 In addition, the redevelopment of this 'brownfield' site would support the provision of 447 much needed homes, making a significant contribution to the Borough's housing delivery; such delivery is encouraged within the Local Development Plan and the National Planning Policy Framework (NPPF 2023). While the principle of the development can be supported in land use terms a balance must be struck between developing land for more efficient housing use and protecting character/heritage/neighbouring amenity etc. Therefore, the principle of providing residential use (Use Class C3) in this location can be supported subject to satisfying the criteria of other relevant policies; such are addressed below.

Build to Rent

- 8.9 The scheme is for Build to Rent which is Use Class C3. London Plan Policy H11 sets out criteria that Build to Rent schemes need to comply with. Build to Rent homes should be secured under a covenant for a least 15 years. A clawback mechanism should also be secured which would be triggered in the event that the covenant is broken during the 15-year period. Other provisions set out in Policy H11, including unified ownership and on-site management, length of tenancy and certainty over rent levels should also be secured. London Plan Policy H11 confirms that, where these requirements are met, it is acceptable for a Build to Rent scheme to provide affordable housing as solely Discount Market Rent at a genuinely affordable rent, preferably London Living Rent levels. The

legal agreement recommended would secure the covenant for at least 15 years, the clawback mechanism and the management plan. This secures the requirements of Policy H11. Affordable housing aspects considered in 8.68 and beyond of this report.

Community use

8.10 Policy DM19 of the Croydon Local Plan states that the Council will support applications for community uses where they:

- a. Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;
- b. Comply with the criteria for D1 class uses in industrial locations set out in Table 5.1;
- c. Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and
- d. Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a District or Local Centre, have no more than 280sqm of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade.

8.11 The proposal would be located within the CMC and would not exceed 280sqm at 208sqm. The applicant has approached several end users to ensure that the space is flexible to accommodate a multitude of uses. The provision of a community use in this location can therefore be supported.

Design and impact on character of the area

8.12 London Plan Policy D9 requires locations appropriate for tall buildings to be identified through the development plan (see below) and requires assessment of impacts from a visual, functional and environmental impact. All these aspects are considered throughout the various sections of this report. Policy SP4.5 of the Croydon Local Plan relating to tall buildings states that they 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. The application site lies within the 'edge area' of Croydon Opportunity Area and within the Croydon Metropolitan Centre and has an excellent PTAL, as such the provision of a tall building in this location can be supported. This position is endorsed by the GLA in their Stage 1 comments.

8.13 CLP Policy SP4.6 (and supported by DM15) states four criteria for tall buildings in order for them to be acceptable in these locations:

- 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.

8.14 CLP Policy DM15 requires their location in PTAL4 and above, to be of exceptional quality, respond positively to nearby heritage assets and include active ground floor and inclusive public realm.

8.15 The Croydon Local Plan 2018 has a place specific policy DM38, Croydon Opportunity Area Framework, which is relevant to this site. The site lies within the defined 'Edge

Area' of the Croydon Opportunity Area. The policies seek to enable development opportunities, including public realm improvements, to be undertaken in a cohesive and coordinated manner complemented by masterplans. Policy DM38.4 (edge area) states a tall building may be acceptable where it can be demonstrated that there will be limited negative impact on sensitive locations and that the form, height, design and treatment of a building are high quality.

8.16 It is considered that the proposed building does comply with the above criteria, discussed in detail in the design and environmental impact sections of this report.

Height and Massing

8.17 The massing of the building has been rigorously tested in terms of its townscape impact. During pre-application discussions the overall massing and height remained a contentious issue as the design grappled with fitting in with the surrounding townscape, the quantum of development proposed and the potential for harm to surrounding residential amenity. In its final iteration before members, a number of positive amendments have been made to address many of these earlier concerns (see paragraph 3.3 above for the full list secured during the course of the application), such as pulling the building lines back from Hazledean Road and Altyre Road, reducing the overall height of the Towers (from 39/38 storey down to 36/33 storey) and reducing the height of the Villa Block from 12 storey down to 9 storeys.

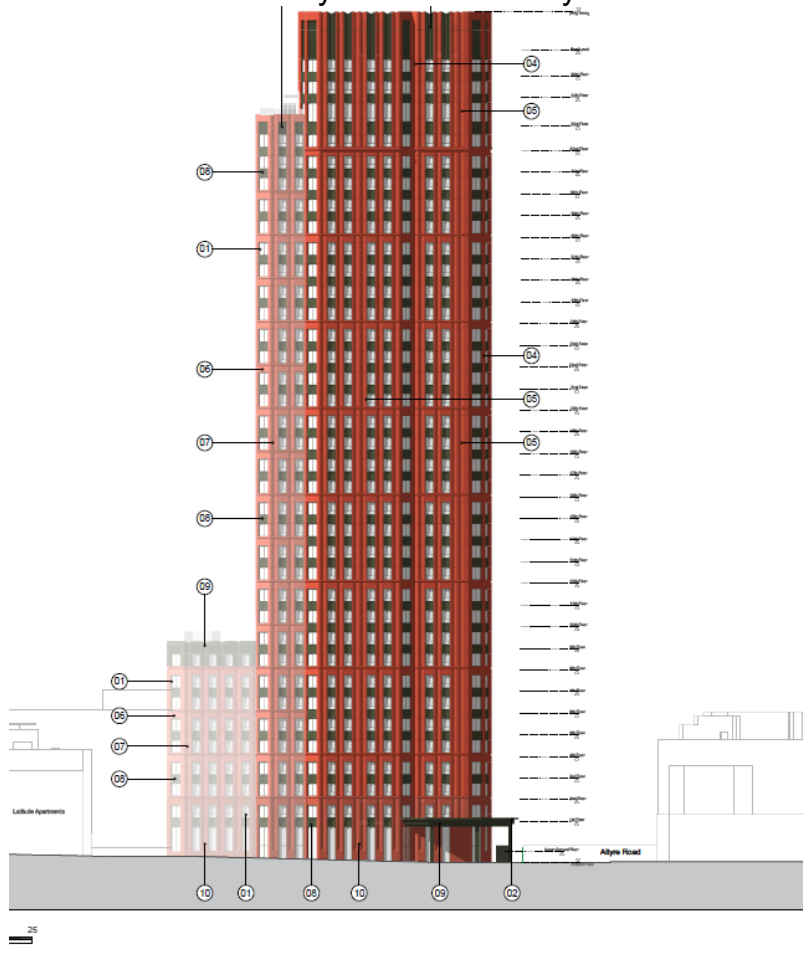


Figure 19: north elevation

8.18 Officers are aware that the Towers to a maximum height of 36 storey are significantly taller than the immediate context, as well as Altitude 25 (25 storey), Pocket Living (21 storey) and the recently allowed on appeal Citylink (28 storey). This was a matter raised at both PRP and the Developer Presentation to Members.

- 8.19 However, the proposed 36 storey maximum height is comparable with the height of Ten Degrees (part 38 and part 44 storey) and College Tower (part 49 and part 34 storey). Whilst officers acknowledge these lie on the opposite side of the railway to the west, all of these buildings are within the 'Edge Area' of the COA where DM38.4 states tall buildings may be acceptable. Officers have worked with the applicant to reduce the height of the Towers, and as a result the scheme has been reduced by three storeys compared to the originally submitted scheme. This has sought to ensure the overall height would be lower than both College Tower and Ten Degrees to the west, as shown on Figure 20 below.
- 8.20 Officers accept that a lower overall maximum height to the Towers could potentially result in a more sensitive response to the built character within this Edge Area and would create a clearer distinction between either side of the railway line. That said, the 36 storey maximum height is the scheme for consideration and determination, not a hypothetical alternative.
- 8.21 The GLA have stated in their Stage 1 response *"The CGIs and townscape views provided suggest that the building has the potential to make a positive contribution to these immediate / local views in terms of townscape character and legibility by providing an attractive, slender and well-articulated tall building"*. Important to note is the fact that this was based on the originally submitted scheme, so the proposal has been reduced in height since that consultation was reached.

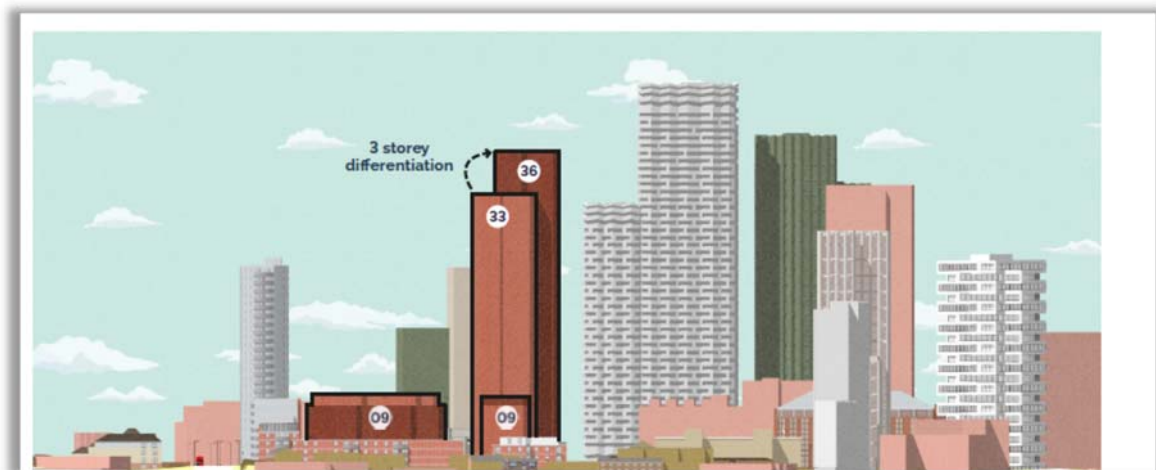


Figure 20: cross section

- 8.22 Whilst officers do identify some harm to townscape as a result of the extent of height proposed for the Towers which weighs against the scheme, this needs to be carefully balanced against the public benefits that this proposal would bring forward. This is discussed in more detail in paragraph 8.64 below).
- 8.23 Officers are supportive of the macro massing narrative to the Towers which is defined by two interlocking tower forms. Its purpose is to break up and enhance verticality within the massing form and thus create the impression of slenderness. Additional vertical recesses have been added into each tower elevation to further break up the massing form and enhance verticality. This form has the added benefit of allowing for a high proportion of dual aspect units.

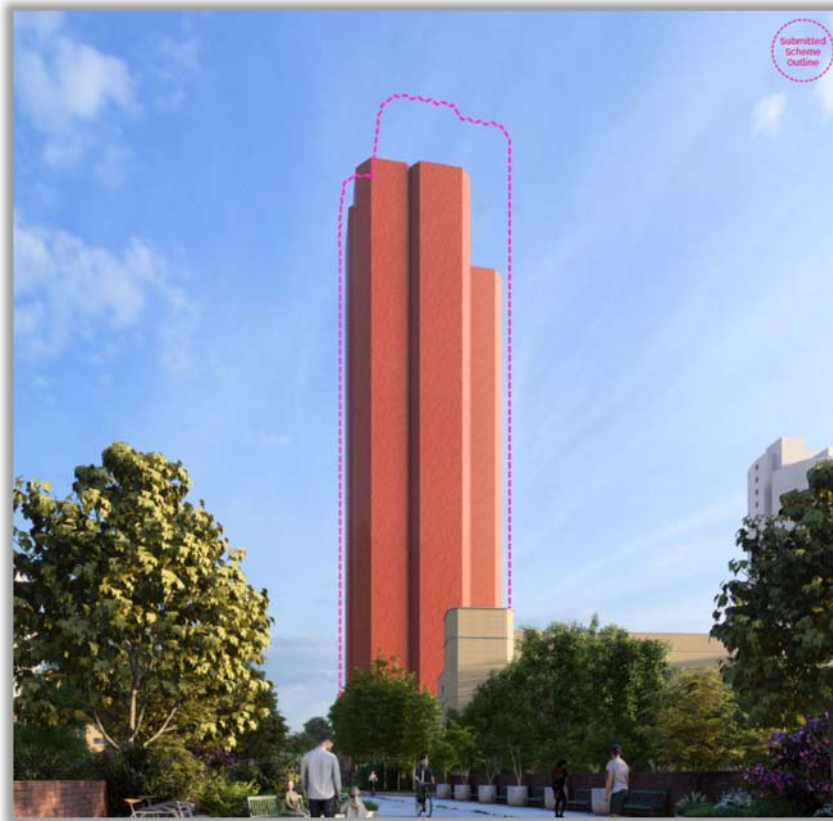


Figure 21: view looking east from Hazledean Bridge (red outline shows the height as originally submitted, with officers securing a reduction in height)

- 8.24 To the northeast lies the Villa Block which is a 9 storey element to the side of the Tower fronting Hazledean Road. The Villa Block contains a mix of amenity space on the ground floor with self-contained flats above. The height of the Villa Block has been reduced from 12 storey on submission to 9 storey allowing it to better integrate in the street scene and align with the height of the Mansion Block to the south. This provides a consistent height of the lower elements of the scheme which enables the proposal to integrate into the surrounding area with reference to the nine-storey blank façade of Altitude 25. The treatment of the façade of the Villa Block follows that of the Towers to ensure that the development appears well-articulated and knits into the local Croydon vernacular.
- 8.25 Officers are supportive of the height and mass of the 9 storey Mansion Block on Altyre Road. The Mansion Block infills the gap between the Towers proposed as part of this scheme and Altitude 25, completing the perimeter block. The block responds positively to surrounding constraints with the height aligning with the existing blank flank wall on Altitude 25, separation gaps either end between the two towers and a top floor setback, helping to create a visual and spatial break between the built forms which is supported. The existing hotel is currently stands at 7 storeys, whilst the proposal would see an increase of two storeys, this would align with the with the 9 storey blank façade of Altitude 25.

Layout and Public Realm

- 8.26 Officers are supportive of the general site principles defined by a perimeter layout with the Towers located on the north-western corner and lower buildings infilling the edges to the existing buildings within the urban block. In respect of street side, an appropriate balance across the sites accesses and servicing has been struck with improvements to the public realm and landscape. The middle of the urban block provides space for a residential communal landscape and amenities for the new occupiers of the scheme, which is supported.

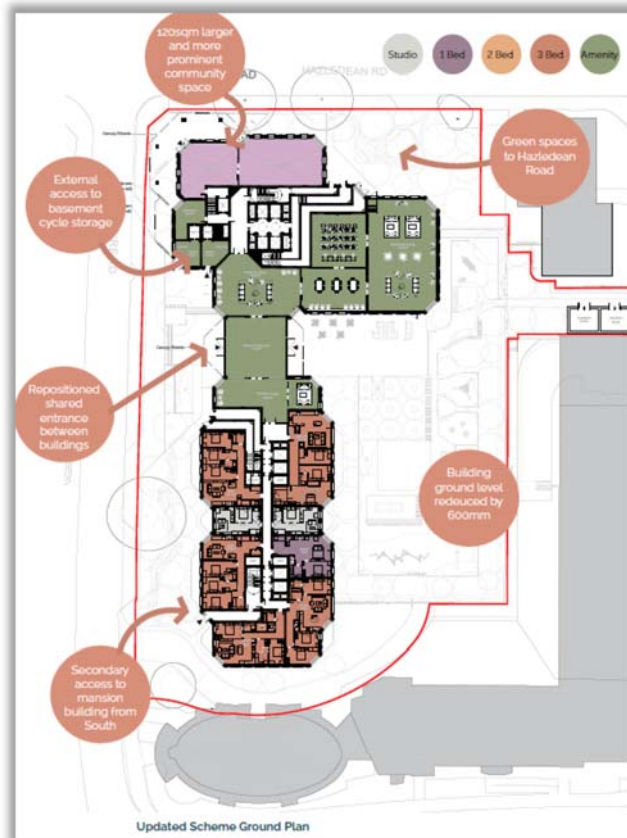


Figure 22: Ground floor plan

8.27 Ground floor uses include a community space, communal residential amenity and ground floor residential dwellings, which are appropriate. The community space is located on and the entrance to on the prominent corner of Altyre Road and Hazledean Road (see Figure 23 below), accessible to both the wider community and the buildings residents. The primary residential entrance is positioned on Altyre Road within the 2-storey link between the Towers and Mansion Block, creating a visual connection through to the rear landscape. A means of escape is available from the northern side of the Villa Block, on the inner elbow of the junction with the Towers. The remainder of the Tower and Villa Block ground floor provides communal amenity space for residents including lounges, shared dining and a cinema room. The Mansion Block ground floor is primarily single storey residential dwellings with a secondary entrance to the southern end. Overall, the layout is fully supported.



Figure 23: View of community space entrance

- 8.28 A series of public realm and landscaped spaces have been formed within the frontage between the pavement and the building edges. Officers are supportive of the principle of enhancing this strategic green link along Altyre Road which connects East Croydon station to Park Hill Park. Within the site boundary, play along the way, green landscaping, hard surface upgrades and tree planting are welcomed and help accommodate the increase in built scale. Tree planting along this route is recommended as part of the S.106 legal agreement to further mitigate the impacts of the development and deliver this important green link. On the corner of Altyre Road and Hazledean Road, a small plaza is created adjacent to the community space and beneath a canopy, which is required to mitigate wind downdrafts. A pocket garden is proposed on Hazledean Road which integrates play and has been identified as a location for the public art required as part of the scheme. This would be secured by S.106 legal agreement.



Figure 24: View looking north along proposed green frontage on Altyre Road

- 8.29 The existing basement is proposed for re-use with some increase in area. The existing basement ramp would be remodelled with the vehicle crossover recited further south along Altyre Road to provide access to a servicing bay and 13 disabled parking bays at basement level. The removal and relocation of the existing vehicular crossovers will provide opportunities for greater levels of soft landscaping along Altyre Road with play on the way which would contribute to the green link from East Croydon train station southwards towards South Park Hill Park. Positively, most of the car parking, refuse and cycle storage would be contained at this lower level within the basement (accessed via a lift from the Altyre Road frontage), freeing up the ground level for active uses, public realm and landscaping.
- 8.30 Overall, the location of the built form back from the pavement edge that facilitates a combination of pocket garden, small plaza and greening of the frontage, as well as the delivery of public realm, are supported.

Appearance

- 8.31 Officers are supportive of the buildings proposed architectural appearance. Across the development, the different buildings share a common language with variations, allowing different buildings to respond to their individual roles within the setting.

Towers

- 8.32 The Towers' role is to contribute to and mediate between the emerging tall building cluster and the local neighbourhoods. The architectural expression draws upon

Croydon's modernist heritage, using a façade grid to articulate groupings, floors and bays. The design subtly varies the composition of these elements to distinguish the massing components such as the interlocking tower forms. This approach speaks to a similar underlying language used by College Tower and Ten Degrees, and ensure the buildings have a shared character within wider townscape views. The material red terracotta tone and texture helps to mediate the buildings scale to the immediate context, where brick is predominantly used while providing a visual change and/or backdrop to Croydon post war heritage.



Figure 25: View from Hazledean Bridge where only the Towers are visible

8.33 The base of the buildings is defined by both a material and textural change compared to the body above and links a continuous datum across all buildings in the development. Within this lower zone, canopies are used to mitigate adverse wind impacts and help express the location of entrances. The PRP panel suggested a more formal plinth to the building with the body stepping back, to better mediate to neighbouring scales and protect from wind. Wind matters have been addressed through other forms of mitigation and therefore Officers feel the base would be appropriate given that a more prominent base would result in a significant loss of floor space and ultimately would reduce in the number of units.



Figure 26: Altyre Road view with the Towers (left) and Mansion Block (right)

- 8.34 The top of the tallest tower is expressed through a crenelated crown and solid green chamfers, whilst the lower tower takes a more subtle capping. This approach provides a degree of richness to the top of the building which is reflective of the character of recent developments in the immediate area.



Figure 27: crown articulation at top of the Towers

- 8.35 The body of the tower uses a repeating bay detail as a base component to form the overall composition. The bay detail is designed in a way to assist the building in meeting its environmental requirements such as overheating, daylight levels, thermal comfort and ventilation. For example, the window openings have a deep reveal which provides overhang to help control the amount of sunlight in summer months.

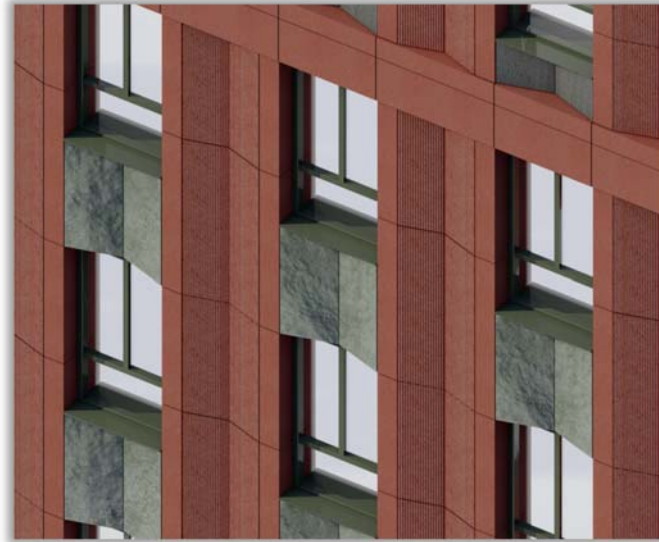


Figure 28: model view of typical bay

Villa Block

8.36 The Villa block would be sited adjoining the Towers to the east and would have an overall height of 9 storeys, matching that of the Mansion Block. The amendments received during the course of the application have seen the Villa Block reduced from 12 to 9 storeys to provide consistency in the heights of the lower elements. Furthermore, this has reduced the height of the development closest to Longitude Apartments to the east therefore improving this relationship. The Villa Block shares its architectural style and fenestration with the Towers. The Villa Block would be set back 14.6m from Hazledean Road to allow for the provision of a pocket garden. The pocket garden would not only seek to benefit residents and the wider public, but it would also seek to enhance the setting of the Villa Block at pedestrian level.



Figure 29: the Villa Block

Mansion Block

8.37 The Mansion Block is similar but with subtle differences. The façade principles share features such bay proportions, rhythm, datums and some aspects of materiality, whilst

differs by having balconies (conditions more comfortable at lower levels compared to the tower) and a more textured aggregate within the terracotta.

Materials

8.38 The primary materials combine red tones from terracotta's and precast concrete, with green tones from ceramic panels and fenestration features. In addition, the design uses ribbing to the surface and changes in the aggregate mix to vary the texture of these base materials and create visual interest. The pallet is different to a number of the other buildings in the locale such as the NLA Tower, Pocket and Altitude 25 and officers are aware of the views of members from the Developer Presentation. The applicant explored lighter tones as options, but it was considered that the warmer tones, that pick up on the colour of the current Hotel on site, Latitude and Longitude apartments and red brick buildings beyond, with green elements that pick up on Ten Degrees and reference the name of scheme as 'Botanical House' were the most appropriate and high-quality response. Furthermore, the change in material palette seeks to allow the mid-century buildings of Croydon to prevail in the wider townscape.



Figure 30: material palette

Landscaping

8.39 The development is proposing some tree removal (15), the most significant being a Cat B Honey Locust on Altrye Road. To offset the loss, the development proposes 45 new tree spread across public (street frontages) and private (residential courtyard) areas.



Figure 31: landscape plan

8.40 London Plan policy G5 requires major development to contribute to greening, setting a target score of 0.4. The development provides public realm landscaping improvements and a landscaped courtyard garden for future residents. Extensive landscaping is proposed across the development, which includes the retention of 5 trees, and the introduction of 45 new trees with further soft landscaping designed to deliver visual interest and contribute to a net gain in biodiversity, with an Urban Greening Factor of 0.42 against a policy target of 0.4.

8.41 London Plan policy G6 requires that any development seeks to provide biodiversity net gain. The Biodiversity Net Gain Assessment identifies a net increase in ecological value of 50.99% for habitat units and 100% for hedgerow units which significantly exceeds policy and is fully supported.

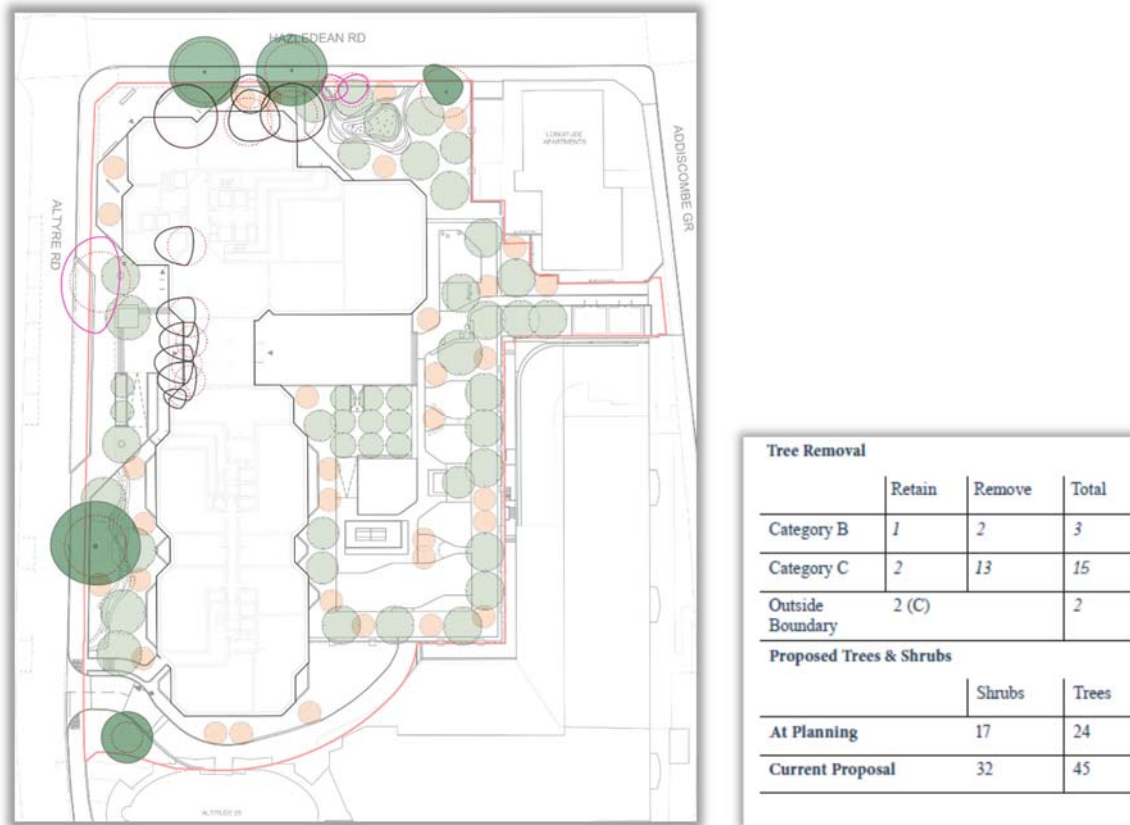


Figure 32: tree strategy table and plan

8.42 Overall, the landscape proposal would result in a high-quality development that would have real environmental benefits, not only for the residents but the wider public. To ensure that the landscaping does not result in a generic approach full details would be secured via an appropriately worded condition. Such appropriately worded conditions would help to ensure that the landscaping proposals are ambitious and evolve a narrative more closely linked to this part of Croydon.

8.43 The LPG on Optimising Site Capacity 2023 states that, “good growth across London requires development to optimise site capacity, rather than maximising density. This means responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, need for increased housing supply, and key factors such as access by walking, cycling and public transport, alongside an improved quality of life for Londoners. Capacity-testing should be the product of the design-led approach, and not the driver.” Throughout the course of the pre-application discussions and application amendments the changes made by the applicant have sought an appropriate balance, optimising site capacity and density. Overall building heights and unit numbers have been reduced to ensure that a high quality and exemplar design is achieved while ensuring that the large number of homes (447 in total) are located in highly accessible locations which actively encourage walking through improvement public realm and pedestrian crossings (as of which would be secured as part of any legal agreement)

Heritage

8.44 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. With regard to conservation areas (at section 72), it requires

special attention to be paid to the desirability of preserving or enhancing their character or appearance.

- 8.45 The NPPF places strong emphasis on the desirability of sustaining and enhancing the significance of heritage assets and affords great weight to the asset's conservation. It states that:

“great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm”

- 8.46 Any harm to a designated heritage asset, including from development within its setting requires *“clear and convincing justification”*, with less than substantial harm weighed against the public benefits delivered by the proposed development.

- 8.47 With regard to non-designated heritage assets, paragraph 203 of the NPPF states that:

“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing...applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

- 8.48 Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy SP4 requires developments to respect and enhance heritage assets, and Policy DM15 permits tall buildings which relate positively to nearby heritage assets. London Plan Policy HC1 states that developments should conserve historic significance by being sympathetic of the assets' significance and setting along with HC3 that protects strategic and local views. This policy goes on to state that new development can make a positive contribution to the views, and this should be encouraged.

- 8.49 The setting of a building is defined as 'the surroundings in which a heritage asset is experienced' in the glossary to the NPPF *“It's extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance of may be neutral.”*

- 8.50 The site is not within a Conservation Area; however, the site lies in close proximity to the Chatsworth Road conservation Area (approximately 74m to the south of the site) and the Central Croydon Conservation Area (approximately 400m to the west of the site). There are no statutorily designated heritage assets on the site, but a number of listed and locally listed buildings are located within the wider area. In terms of non-designated heritage assets, the NLA Tower (local listed building) lies 160m to the north and Fairfield Halls (local listed building) lies 270m to the west. Park Hill Locally Listed Historic Park and Garden lies 80m to the south. The development will be visible in the setting of the Conservation Areas and some other nearby heritage assets due to its height and form.

- 8.51 A detailed Townscape, Heritage and Visual Impact Assessment (HVIA) was submitted as part of the application and was amended following the scheme amendments. This assesses the impacts of the proposal on a range of nearby heritage assets, accompanied by views. The analysis of the views used the Zone of Theoretical Visibility approach (ZTV) to assess where views may be impacts. From this study it can be seen the key heritage impacts are the setting of the Chatsworth Road Conservation and

longer-range views from within the Central Croydon Conservation Area, particularly views of Fairfield Halls which is a non-designated heritage asset.

8.52 Whilst the existing building has a maximum height of 7 storey, the proposal would significantly increase the height of the built form and would result in a sharper transition from the predominately 3 to 4 storey Victorian and post war residential housing within the Fairfield Ward, as visible in the images below. As such the designated heritage asset where the proposal is most visible from is the Chatsworth Road Conservation Area as the proposed development is in close proximity and prominent in a number of the views. The massing and articulation of volumes (stepping up in height away from the Conservation Area) have been designed to help mediate the relationship between the houses and the height of the interlocking Towers, which has helped to limit any harm being caused to the setting of this Conservation Area. The use of terracotta tones in the external facing materials help to differentiate the central cluster from the application site, providing a clear distinction when viewed from within the Conservation Area. Officers consider that the use of different tones in the built environment would provide interest and variation that would distinguish the proposal. The Towers are clearly visible from a number of locations, so would impact the setting in short and medium length views. Whilst this element of the development is considered to cause some harm, in terms of the setting of the designated heritage asset, officers have concluded that the harm caused would be less than substantial.



Figures 33 and 34: view from Chatsworth Road (within the Chatsworth Road Conservation Area), facing north towards the site without (left) and with (right) proposal



Figures 35 and 36: view from Friends Road looking north-east towards the site without (left) and with (right) proposal



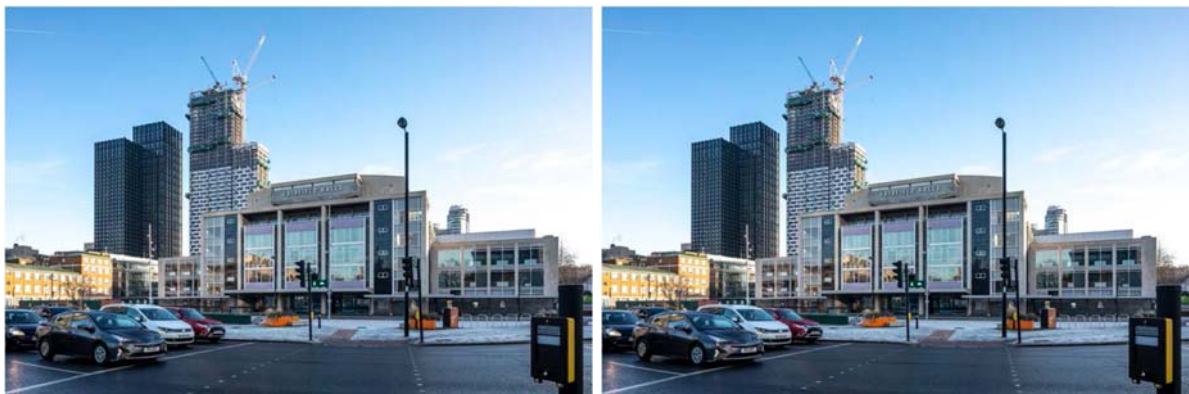
Figures 37 and 38: view from Queens Gardens (within the Central Croydon Conservation Area) looking east towards the site without (left) and with (right) proposal



Figures 39 and 40: View from South Park Hill Park looking north without (left) and with (right)

8.53

The proposed building, given its heights and interlocking towers would be visible behind the silhouette of Fairfield Halls which is a non-designated heritage asset, from within the Central Croydon Conservation Area. The setting of Fairfield Halls, which is not a designated asset, is to some extent interrupted by the presence of Altitude 25. In addition, the setting of Fairfield Halls has been impacted by nearby developments, particularly College Tower and Ten Degrees, shown in Figures 37 and 38 above and Figures 41 and 42 below. Given the non-statutory status of Fairfield Halls and the openness surrounding the building at pedestrian level the level of harm that would result should this proposal be approved is considered to be less than significant. The use of terracotta tones in the proposed material palette would help to differentiate the Towers from that of Fairfield Halls. The use of lighter materials in the construction and renovation of Fairfield Halls are consistent with the post war development and architecture of the Croydon Metropolitan Centre, the use of darker tones in the proposed development would help to define the post war era from more recent developments.



Figures 41 and 42: view directly over Fairfield Halls looking east towards the site, the reduction in height from 38/39 storeys to 33/36 results in the proposal no longer being visible from close range viewpoints. Without (left) and with (right) proposal.

- 8.54 The Central Croydon Conservation Area comprises the commercial and civic heart of Croydon and includes the 16th century Grade I listed Whitgift Almshouses, Surrey Street market as well as Queens Gardens the Grade II listed Late Victorian Town Hall and 1930s modernist office buildings including the Grade II listed Segas House. The appraisal identifies key views along George Street towards the NLA tower.
- 8.55 View 17 of the applicant's HVIA shows that the proposed tower would not harm the Grade I listed Whitgift Almshouses, or impact the key view set out above along George Street.
- 8.56 View 18 shows that the proposal would appear directly behind the rear facade of the Grade II listed Segas House in views along Katharine Street. The street view is lined on the right-hand side by the Grade II listed Victorian Town Hall, Municipal Buildings and library as well as the Grade II listed former Nat West Bank (now the Spread Eagle pub). Whilst the main impact of the Tower would be on the rear facade of the Segas House, these elevations are attractive and significant features of the building and exhibit the same curved double height ground floor bay windows and large gridded horizontal windows. The visibility of the Tower would be highly prominent in this view, rising above the centre of the silhouette of Segas House building. It would be viewed alongside the College Road development and St George's House (Nestle Tower). Officers consider that the impact of the tower on the setting of the Segas House would result in less than substantial harm to the significance of the Grade II listed heritage asset. This would be at a moderate level on the scale of less than substantial harm.
- 8.57 The level of harm caused to the Grade II listed Municipal Buildings (including the Town Hall, Library, Corn Exchange, Clock tower and offices and war memorial) would be lower, given that the Tower would not be in the backdrop of these buildings. However, some harm would still be caused to the significance of these heritage assets by the Tower marking this prominent street view. The level of harm caused would be less than substantial and at a low level on the scale of less than substantial harm.
- 8.58 In terms of the Central Croydon Conservation Area, harm would be caused by the impacts summarised above in terms of the visibility of the Tower in views along Katherine Street (HVIA view 18). In addition, the Tower would be visible in views across Queens Gardens looking east towards the existing cluster of tall buildings including Ten Degrees and College Road towers (HVIA view 19). The proposal would cause additional cumulative harm in this view with the building rising above Fairfield Halls. Officers consider that a low level of less than substantial harm would be caused to the significance of the Central Croydon Conservation Area.
- 8.59 No direct harm to the fabric of any designated heritage assets would occur as a result of the proposal. However, it is considered the proposed development would have a less than substantial impact on the settings of both the Chatsworth Road Conservation Area and the Central Croydon Conservation Area. In addition to this there would be an impact on both the Grade II listed Segas House and Municipal Buildings, as less than substantial, at the moderate level and low level respectively. There is no harm identified to further surrounding designated and non-designated heritage assets.



Figures 43 and 44: view looking south along Cherry Orchard Road towards the site in relation to the NLA Tower. Without (left) and with (right) proposal.

8.60 It is also important to draw member's attention to the recent Citylink House allowed appeal decision (reference 21/02912/FUL), which forms a material consideration. This scheme would be visible in views south along Cherry Orchard Road and was refused on the effect on the setting of a non-designated heritage asset (NDHA), known as the NLA tower. Citylink House is sited closer to the NLA Tower with a separation distance of approximately 30 metres, whilst the Croydon Park Hotel site sits approximately 154 metres further south. In allowing the appeal, the Inspector stated:

"The NDHA's setting is within a heavily developed urban area, dominated by transport infrastructure, which existed at the time of the construction of the tower. This setting aids the understanding of the development of the NLA tower as part of the post war growth plan of Croydon... The development would be greater in size and scale than the NLA tower but there is clearly articulated differentiation between the shoulder and tower... In this respect, there would be obscuring and coalescing effects from the development in relation to the NLA tower, in varying degrees, in these views."

8.61 In allowing the Citylink House appeal, the Inspector concluded that the tower (28 storey) and shoulder (14 storey) would not harm the setting of the NDHA or ability to appreciate it's significance. In the case of this current application, it is noted that the views of the NLA Tower from the north and south would be obscured in part by the Towers, but the development would have limited impact on the eastern and western views, which in the case of the Citylink House appeal was attributed greater weight by the Inspector. Consideration should also be given to the separation distance of approximately 154 metres and the presence (and consents) of other buildings in and around the NLA Tower which are much closer. Given all these factors due consideration the proposed development is not considered to result in harm to the setting of this non-designated heritage asset nor would it detract from its significance.

Balance

8.62 As harm has been identified to heritage assets the provision of paragraph 202 of the NPPF to weigh any harm against the public benefits of the scheme is enacted. When weighing the proposed harm to designated heritage assets against public benefits of the scheme, any harm is given considerable importance and weight. A balanced judgement towards harm caused to non-designated heritage assets is also required. Public benefits can include heritage benefits and great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

8.63 No direct harm to the fabric of any designated heritage assets would occur as a result of the proposal, however, a degree of harm has been identified to Chatsworth Road Conservation Area and the Central Croydon Conservation Area and therefore the

statutory presumption toward preservation or enhancement has not been met. The level of harm in this case is less than substantial and would be at the lower end of this scale across all assets considered.

- 8.64 Public benefits *“could be anything that delivers economic, social or environmental progress as described in the 2023 NPPF”* The NPPG continues stating that *“public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit”*. The development does deliver a number of public benefits, including housing provision, a quantity of which would be for affordable housing delivered on site including wheelchair accessible homes, family accommodation, an improved public realm and pocket park and greening to the street frontages, including the replacement of the existing building with a high-quality scheme, community space on the ground floor for use by local groups, highway improvement works to include enhancements to the pedestrian crossing on Barclay Road and the planting of street trees, a contribution towards wider transport network improvements (particularly pedestrian and cyclist) and short-term employment derived from the construction of the development.
- 8.65 It is considered that these public benefits are sufficient to outweigh the less than substantial harm identified to the heritage assets outlined above and therefore as per requirements of the NPPF, making a balanced judgement as to the scale of harm and the significance of the asset, the impact is considered to be acceptable. Notwithstanding this, it is essential that the development provides an exceptionally high design quality in relation to materials and other detailed matters at planning conditions stage. This is to ensure that the building, which is visible in the setting of heritage assets, is one of which is perceived as being of excellent contemporary design which responds appropriately to its historic context.

Housing Mix and Affordable Housing

Housing Mix

- 8.66 Croydon Local Plan 2018 policy SP2.7 sets a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms. Policy DM1.1 allows for setting preferred mixes on individual sites via table 4.1. Applying table 4.1 to this site (Central setting with a PTAL of 4, 5, 6a or 6b within West Croydon, Fairfield and Mid Croydon area) shows a requirement of 20% 3+ bedrooms units unless there is agreement from an affordable housing provider (that these are not viable or needed).
- 8.67 The proposed development would achieve a 25% (110) provision of three-bedroom homes, thereby exceeding the policy standard set out with the OAPF which is specific to this development site, the provision of three-bedroom homes is therefore acceptable.

Affordable Housing

- 8.68 Policy SP2.4 of the Croydon Local Plan 2018 seeks to negotiate to achieve up to 50% affordable housing, subject to viability. Part b) of the policy seeks a 60:40 ratio between affordable rented homes and intermediate (including starter) homes unless there is agreement that a different tenure split is justified (a minimum of three Registered Providers should be approached before the Council will consider applying this policy). The policy also requires a minimum provision of affordable housing as set out in policy SP2.5, which requires a minimum provision of affordable housing to be provided either:

a) Preferably as a minimum level of 30% affordable housing on the same site as the proposed development or, if 30% on site provision is not viable;

b) If the site is in the Croydon Opportunity Area or a District Centre, as a minimum level of 15% affordable housing on the same site as the proposed development plus the simultaneous delivery of the equivalent of 15% affordable housing on a donor site with a prior planning permission in addition to that site's own requirement. If the site is in the Croydon Opportunity Area, the donor site must be located within either the Croydon Opportunity Area or one of the neighbouring Places of Addiscombe, Broad Green & Selhurst, South Croydon or Waddon. If the site is in a District Centre, the donor site must be located within the same Place as the District Centre; or

c) As a minimum level of 15% affordable housing on the same site as the proposed development, plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile and, in the case of developments in the Croydon Opportunity Area or District Centres, there is no suitable donor site.

8.69 The London Plan (2021) Policy H5 sets a strategic target of 50% but allows lower provision to be provided dependent on whether it meets/exceeds certain thresholds, or when it has been viability tested. It should be noted as the London Plan (2021) was adopted after the Croydon Local Plan (2018), where there is a policy difference, then the most recently adopted policy should take precedent.

8.70 The scheme is for Build to Rent homes and the most up-to-date policy is H11 of the London Plan (2021). Subject to meeting certain criteria (covered in paragraph 8.9 above), the policy confirms that the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. Part C of the policy states that the Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent (LLR) with the remaining 70 per cent at a range of genuinely affordable rents.

8.71 The London Plan stipulates that to follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land.

8.72 The proposed development would provide 20% affordable housing by habitable room, which amounts to 86 homes. Therefore, the scheme is not following the Fast Track route and as such a financial viability appraisal has been submitted with the application. The tenure split would be 70% DMR to 30% LLR with the affordable units being 'pepper potted' throughout the development and across the Towers, Villa and Mansion Blocks.

8.73 The application was subject to a financial viability appraisal (FVA), which has been scrutinised independently by Gerald Eve (GE). Furthermore, the GLA viability team have sent a report, covered in 5.4 above. The key viability inputs where the focus of discussion has taken place are covered in the table below.

	Standing stock asset approach		Forward funded approach	
	Newsteer	Gerald Eve (acting for the LPA)	Newsteer	Gerald Eve (acting for the LPA)
Base NDV	£187,744,252	£187,744,252	£183,904,041	£183,904,041
Base Cost	£125,702,280	£146,401,174	£125,702,280	£146,401,174
Deficit	£33,456,805	£55,948,114	£14,099,889	£28,446,797

Table 1: key viability inputs

- 8.74 Upon the request by the GLA the applicant has undertaken two Financial Viability Appraisal (FVAs) with the first based on the 'standing stock' approach and the other on a 'forward funded' approach (as shown above in Table 1). Both reviews show a deficit although the forward funded approach indicates there would be less of a deficit. Given the level of deficit the Council's Independent Consultants (Gerald Eve) and the GLA have raised concerns regarding the deliverability of the scheme. In response, the applicant has provided further sensitivity testing to demonstrate when the proposal starts to make a profit. This shows that the development would start to show a return at year 2, based on rental growth with current market trends suggesting that this is a reasonable assumption. The applicant has therefore demonstrated that the scheme would be deliverable based on a medium term of investment (circa 5-6 years given build timescales and rental periods of growth).
- 8.75 The FVA and sensitivity testing show that the proposed scheme is currently unviable and cannot deliver further affordable housing beyond the 20% offered. The conclusion (for both the applicant and GEs review) is that the scheme is in deficit. The applicant has indicated the scheme will be delivered as a standing stock asset, so a deficit of £33,456,805, whilst the Council's independent review suggests a deficit of £55,948,114. The difference is mainly due to the applicant adopting lower construction costs and higher land values. Officers acknowledge the extent of deficit, but weight needs to be given to the uniqueness of this case, current market trends and the mid to longer investment nature of this proposal.
- 8.76 Given the current deficit it is clear that the proposal could not offer a greater level of affordable housing. The applicant proposes 20% affordable housing by habitable room (split by 30% London Living Rent (LLR) level and 70% as Discount Market Rent (DMR) level) that has been independently reviewed as the maximum reasonable, which exceeds the minimum policy requirement of 15% in the Croydon Local Plan and meets the mix requirements of H11 of the London Plan. The legal agreement would secure a review mechanism (more detail below) and construction costs are not in the upper quartile (as confirmed by GE).
- 8.77 LLR is an intermediate affordable housing product with low rents that vary by ward across London, set by the GLA. The DMR homes would also be an intermediate affordable housing product, subject to an annual household income cap of £60,000. These matters would be secured in the S.106 legal agreement.
- 8.78 The GLA has suggested that the scheme's viability could be improved, even providing a surplus, if their assumptions were adopted. However, the GLA have not provided any evidence to support their applied yields, OPEX, marketing and sales figures and therefore the LPA are unable to apply such to its own sensitivity testing. Therefore, in the absence of evidence to the contrary Officers are satisfied that the maximum levels of affordable housing has been secured as part of the proposal.
- 8.79 As required by London Plan Policy H5 (f) early and late-stage reviews are recommended within the legal agreement. They would capture any changes (for example increase in rental prices/reduction in construction costs) which may result in increased affordable housing provision and/or contribution. The applicant has indicated that the scheme will be delivered as a standing stock asset, but this will need to be confirmed to ensure the correct deficit is secured through the S.106 legal agreement. On this basis the lower deficit of £33,456,805 will be applied.

- 8.80 The early-stage review would be engaged if an agreed level of progress on implementation is not made within two years of the permission being granted, in this case construction up to at least first floor level. The late-stage review would be engaged when 75% of the units in the scheme are let.

Quality of residential accommodation

- 8.81 London Plan 2021 policies D5 inclusive design, D6 housing quality and D7 accessible housing seek the highest standards of accommodation for future occupiers. Policy sets out quantitative and qualitative standards, including minimum floor space and amenity standards for new builds in order to promote high quality living accommodation.
- 8.82 The Housing Design Standards LPG 2023 seeks to respond to the impact of the COVID-19 pandemic, including the shift to increased homeworking. It also recognises the climate emergency, and the role that residential development has to play, and the contribution it has to make, in reaching net zero. These housing design standards seeks to provide homes that: are safe, inclusive, comfortable, flexible, durable, well-built and well managed. They encompass designing with residents' wellbeing in mind and express what it means to optimise site capacity for a residential development, as opposed to simply maximising the development of a site.
- 8.83 Croydon Local Plan policy SP2.8 relates to quality and standards, requiring all new homes to meet the standards set out in the Mayor of London's Housing SPG (now covered in D6 identified above) and the National Technical Standards 2015. Croydon Local Plan policy DM10.4 has a number of requirements in relation to providing private amenity space for new residential development. The relevant policy points seek a high quality design; a functional space, a minimum amount (5sq m per one/two person unit and extra 1m² per person after that), minimum of 10m² per child of new play space. Croydon Local Plan policy DM10.5 requires the inclusion of high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.
- 8.84 Typical upper floors are residential dwellings and circulation space. The Tower plan performs well in providing dual aspect units with a central core and steps and kinks within the plan form creating meaningful second aspects (orientation, light, outlook and ventilation). The Mansion Block layout is based upon a central linear corridor with units butterflyed either side. The downside of this typology is it results in a higher proportion of single aspect units. However, folds within the façade do provide enhancements but they would not meet the GLA's guidance for dual aspect dwellings. The proposal would include 52% dual aspect, 44% enhanced aspect and 4% single aspect units. Officers have worked closely with the applicant during the course of the application to increase the proportion of dual aspect homes. This has resulted in an increased from 34% at submission to 44% in respect of enhanced aspect units and 12% to 4% in respect of single aspect units in this scheme for consideration. This has seen a small reduction in dual aspect units from 54% to 52%. Overall, the quality of internal accommodation has been improved. The Tower form has been developed to seek to maximise dual and enhanced aspect units. The Mansion Block is more challenging given orientation and desire to optimise the site; other typologies could have further improved the proportion of dual aspect dwellings, but this is the scheme for consideration. Balancing the challenges of site optimisation, officers are supportive of the layout of the homes.

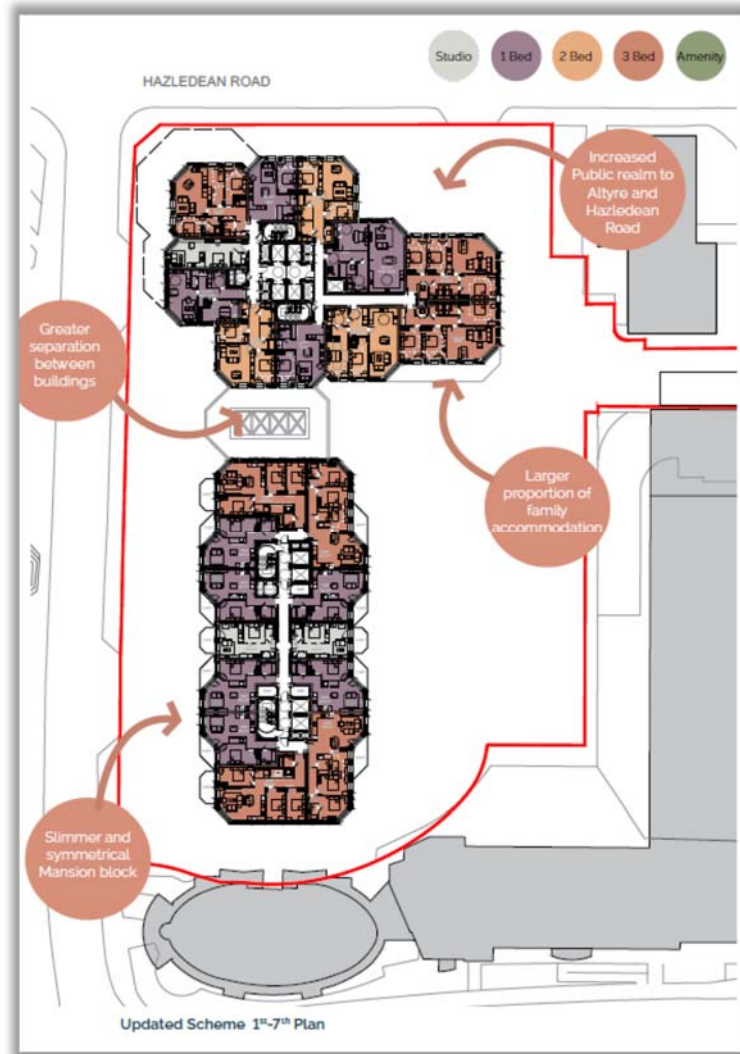


Figure 45: typical floor plan (7th Floor)

8.85 London Plan policy SP4 play and informal recreation seeks, for residential developments, good-quality, accessible play provision for all ages and at least 10sqm of play space should be provided per child. Croydon Local Plan policy DM10.4 and DM10.5 set minimum requirements for the provision of communal amenity space and children’s play areas that will be required in new flatted development. This scheme must provide a minimum of 10m2 per child of new play space, calculated using the Mayor of London’s population yield calculator.

Size and layout

8.86 All of the proposed residential homes either meet or exceed the minimum floor space standards set out in the London Plan (2021) while units which are not provided with private amenity space are oversized in floorspace terms.

8.87 The communal garden to the rear provides a range of spaces to meet residents needs such as external dining spaces, activity spaces, child play equipment and flexible areas for pop up events, curated by the building’s operations team. The garden will be built upon an existing deck with the basement below. Officers have raised concerns over the viability of mature planting upon this base and will require robust conditioning of these details to ensure the qualities indicated within the application are delivered.

8.88 London Plan (2021) states that developments should maximise the provision of dual aspect units, with single aspect units only provided where it considered to be a more appropriate design solution in order to optimise capacity, and where it can be

demonstrated they will have adequate passive ventilation, daylight, privacy and avoid overheating. The Housing Design Standards LPG (2023) sets the definition of dual aspect as "A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building."

8.89 The layout of the scheme has helped to maximise the amount of dual aspect units, at 52%, (rising to 96% when including enhanced aspect), and there are no single aspect north facing units, which is welcomed. An overheating assessment was submitted which demonstrates the proposal maximises passive and active design measures, reducing the risk of overheating as far as practical.

Daylight and sunlight

8.90 The applicant has submitted a sunlight and daylight report that has been carried out in accordance with 2022 BRE guidance. In terms of daylight, the assessment considers the spatial daylight autonomy (sDA) – see Appendix 2. The results are based on using 200 Lux as the target value for mixed use living/kitchen/dining area. The report also considers sunlight to new buildings and their gardens/outdoor spaces. The internal daylight and sunlight assessment has split the results between the Towers/Villa Block and Mansion Block.

8.91 This report has been reviewed by the Council's daylight and sunlight consultant, who conclude that the methodology and application of the guidelines is appropriate.

8.92 In terms of daylight, of the 1,137 proposed habitable rooms considered, 828 (73%) satisfy the BRE guidelines in sDA terms. For the Towers (and Villa Block), of the 882 rooms considered, 699 (79%) satisfy the BRE guidelines, and in the Mansion Block of the 255 rooms considered, 129 (51%) satisfy the BRE guidelines. The originally submitted scheme only achieved 26% of rooms within the Mansion Block adhering to the BRE recommended levels, so the revised scheme improves the daylight levels to this block. The overall level of adherence with the BRE recommendations increases to 77% if 150 Lux is used for the living/kitchen/dining areas within the Mansion Block (up from 51% against 200 Lux).

8.93 There are 307 rooms achieving SDA values below the recommended target. In particular, 168 bedrooms and 69 living-kitchen-dining rooms (LKD) and 72 studios do not meet the illuminance criteria. Out of the 307 rooms not meeting the criteria in total, 68 bedrooms, 46 LKD rooms and 25 studios marginally fall below the criteria. These rooms fall within 5-10% below the passing target (50%). The worst failures are with the southern end of the Mansion Block facing Altitude 25, with one unit containing two bedrooms achieving 0% illuminance, but this unit has a LKD that meets the guidelines, and its third bedroom achieves 49% (against a target of 50%).

8.94 Generally, the overall compliance rate is considered acceptable for a regeneration scheme in an urban location. There are isolated units on the lower to mid floors with rooms that are expected to receive low levels of daylight. This is not uncommon as rooms on lower floors face higher levels of obstruction and windows beneath balconies necessarily have a more limited view of sky but do provide private amenity space for the dwelling above.

8.95 In terms of sunlight, the report evaluated sunlight provision within the scheme by testing living room windows, regardless of their orientation, which is a broader approach than just those within 90 degrees of due south. Of the 450 living rooms tested, 366 (81%) satisfy the BRE guidelines. For the Towers (and Villa Block), of the 346 living rooms considered, 269 (78%) satisfy the BRE guidelines, and in the Mansion Block of the 104

living rooms considered, 96 (92%) satisfy the BRE guidelines. Of the overall failures, 82 of them are north facing, meaning they are expected to achieve lower sunlight values. The worst performing units within the Mansion Block are to the southern end of the block to the rear, whilst within the Towers it is units in the northern elevation fronting Hazledean Road.

8.96 Generally, this represents a good overall adherence to the BRE guidelines as it is inevitable that some living rooms will face predominantly north.

8.97 In terms of outdoor amenity spaces, the results show that for both of the proposed amenity areas (the terrace at level 38 and the ground floor external spaces shown in Figure 46 below) over half of each space would receive at least 2 hours of sun on 21 March thus meeting the guideline.

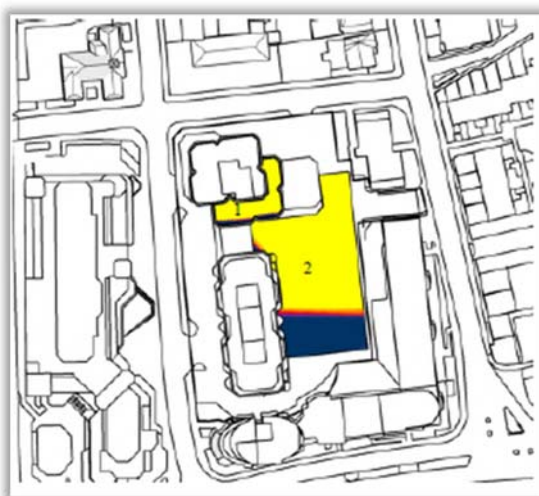


Figure 46: sunlight on the ground on 21st March

8.98 Overall, an acceptable level of sun and day light is achieved. Officers are also satisfied that where BRE standards have not been achieved that this is due to a combination of factors including site optimisation, site characteristics and design considerations.

Outlook and privacy

8.99 Paragraph 6.80 of the Croydon Local Plan states “A minimum separation of 18-21m between directly facing habitable room windows on main rear elevations is a best practice ‘yardstick’ in common usage and should be applied flexibly, dependent on the context of the development to ensure that development is provided at an acceptable density in the local context”.

8.100 There are a number of units (16) towards the southern side of the Towers which would look out onto the northern flank elevation of the Mansion Block. The distance between the Towers and the Mansion Block is approximately 10m and would occur up to the 9th storey only, given the height of the Mansion Block. The 16 units affected would be provided with enhanced outlooks to the south-east and south-west which would be acceptable.

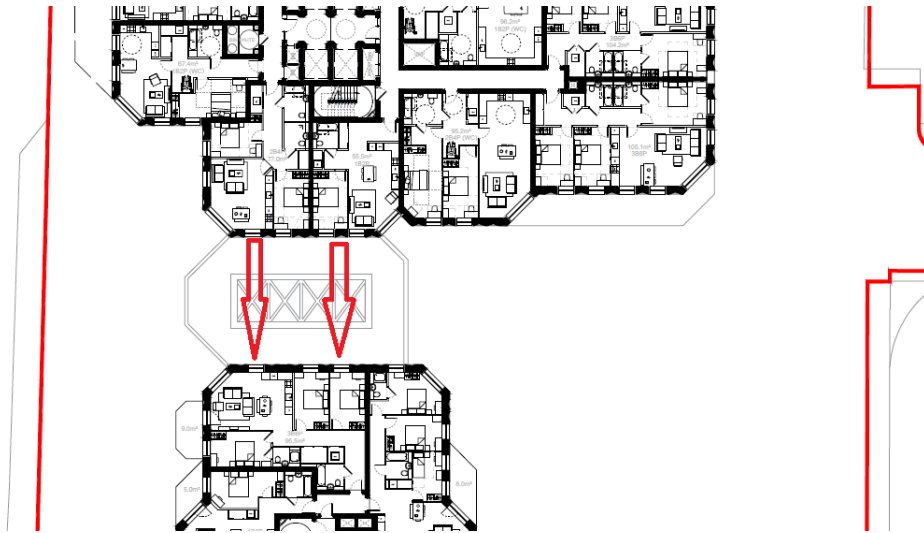


Figure 47: window alignment between the tower and mansion block from 1st to 7th floors

- 8.101 The Development Plan nor the LPGs provide a 'yardstick' measurement for the depth in respect of outlook and therefore a planning judgement needs to be applied. In this case, a 10m outlook would be provided before an obstruction is encountered while an enhanced outlook would allow greater views out from these windows. It is therefore considered that the 16 affected units on the southern elevation would be provided with an acceptable level of outlook given the need for site optimisation.
- 8.102 It is noted that the windows within the south elevation of the Towers have bedrooms with sole outlook towards the Mansion Block (and vice-versa) and LKD rooms facing each other but with angled windows also within those rooms. It is important that the bedrooms have an outlook, and given they do not directly face each other, conditioning as obscurely glazed is not considered reasonable. However, as the LKD have windows orientated away as well as the windows facing, it is felt a condition to obscurely glaze these windows is justified.
- 8.103 The Mansion Block would be sited approximately 6-8 metres from the northern flank elevation of Altitude 25, with its northern elevation containing no north facing windows up to the 9th floors. The 9 storey height of the Mansion Block would therefore not obstruct or restrict outlook. Windows to Altitude 25 are further eastwards and would overlook a communal garden whereas existing views would overlook the existing hotel complex. Given the relationship between the Mansion Block and Altitude 25 no direct overlooking would occur. The Towers would be visible from the windows of Altitude 25 but would be sited in excess of 68 metres away, therefore good levels of outlook would be provided from the flats in Altitude 25.
- 8.104 There are flats further east known as Latitude Apartments which would overlook the communal garden area of the proposed development with separation distances of approximately 68m between the Villa Block and Latitude Apartments, which would maintain appropriate levels of outlook.
- 8.105 All other proposed windows would be sited more than 18m from the neighbouring residential development and therefore appropriate levels of privacy for future occupiers would be achieved. There is a generous separation distance with no direct window alignment between the Villa and Mansion Blocks and therefore appropriate levels of privacy would be provided for the future occupiers of this blocks.
- 8.106 There is sufficient separation (in excess of 21m) between the proposed units and the Law Courts for there to be no detrimental impact on the future occupier's privacy or outlook.

Wind

- 8.107 The submitted wind study (which utilised wind tunnel testing) indicates that all of the balconies within the Mansion Block, the ground floor shared outdoor spaces and roof top terrace at the 33rd floor would achieve wind conditions that are suitable for their intended use with fixed mitigation at ground and 33rd floor. Fixed mitigation at ground floor would comprise an entrance canopy and fixed wind screens as part of the landscaping proposals while at the 33rd floor, the amenity space has been moved to the eastern side of the towers with wind screens and soft landscaping. Subject to a suitably worded condition these areas would be suitable for their intended uses.

Noise

- 8.108 The agent of change policy (D13 of the London Plan) puts the responsibility for mitigating impacts from existing noise generating uses (in this case the Law Courts and Church to the west/north-west) on the proposed noise-sensitive development.
- 8.109 The Environmental Health officer has reviewed the submitted noise and vibration assessment, and raises no objections, stating that the recommendations (namely the provision of enhanced glazing and ventilation of appropriate specification as detailed with the assessment and limits on plant noise) are appropriate and should be secured by condition.

Private/Communal Amenity Space and Child Play Space Provision

- 8.110 All of the proposed residential homes either meet or exceed the minimum floor space standards set out in the London Plan (2021) while units which are not provided with private amenity space are oversized in floorspace terms. All ground floor homes in the Mansion Block would have private amenity space with the upper floor units provided private balconies. The units in the Towers and Villa Block are not provided with private terraces and/or balconies due to issues in relation to useability of these spaces at higher level and elegance of the building; these units are appropriately oversized as a result. As such, the conflict with London Plan Policy D6 is therefore considered to be justified, on balance, given the specific circumstances and in light of other material considerations.
- 8.111 The development provides a series of external spaces, comprising a communal courtyard garden of 1,802 sqm, a pocket garden of 454 sqm, a communal roof terrace of 273 sqm, and improved public realm areas of 1,022 sqm. Communal internal space is also provided across the Ground (585sqm) and 33rd floors (134sqm). All spaces are accessible to all future residents of the development and have been designed as flexible, multifunctional, and inclusive.
- 8.112 All units would access to the communal amenity spaces which have been designed to provide places for resting, socialising and play, whilst also increasing biodiversity. The images of benches, tables and play equipment are welcomed and alongside other features such as play on the way, providing a range of different spatial experiences and cater for multiple users. Detailed plans and specifications for play equipment, along with the soft and hard landscaping, will need to be secured by condition and the requirement to understand the density of planting.
- 8.113 The development would provide play on site for ages 0-4's and 5-11's with the over 12-year-old provision being provided offsite (with a requirement of 128sqm).



Figure 48: location of play space within development

8.114 Although there is space within the overall landscaping areas the proposal does not provide play space for the 12-15 and 16-17 year age ranges, highlighting that due to the sites constraints to provide meaningful play for older children and need to provide outdoor space for adult residents, these older children will be encouraged to visit Park Hill Park, which is within close proximity 60m to the south. Whilst this position is accepted the scheme stills needs to mitigate against the shortfall of older children play space. A financial contribution of £10,892 will be secured in lieu of this shortfall based on the costs of equipping an area of approximately 128sqm with suitable equipment and including an allowance for future maintenance.

8.115 The noise impact assessment additionally found the outdoor spaces within the scheme to be suitable without mitigation, as confirmed by the environmental health officer.

Fire safety

8.116 Although fire safety is predominantly a building regulations issue, policy D12 of the London Plan 2021 requires developments to achieve the highest standards of fire safety for all building users. The policy sets out a number of requirements, with the submission of a Fire Statement (an independent fire strategy produced by a third party suitably qualified assessor) setting out how the development has been designed and will function to minimise fire risk.

8.117 Policy D5 B 5) of the London Plan requires that in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

8.118 The fire statement has been drafted by a BB7 who through its authors are registered with the Institute of Fire Engineers as a Member of the Institute. The statement has therefore been prepared by a suitably qualified assessor. The GLA have confirmed they are satisfied with the submission in relation to fire.

8.119 The scheme is a 'relevant building' under planning gateway one and hence the Health and Safety Executive (HSE) were consulted. The HSE have reviewed the amended fire statement and are satisfied with the information provided, raising no substantive objections. The interlocking Towers and Villa Block are served by two stair cores and a separate firefighting stair core with the Mansion Block served by two separate stair cores.

- 8.120 Both the interlocking Tower and Villa Block and Mansion Block will be provided with two evacuation lifts. This will ensure the safe and dignified emergency evacuation for all users in line with London Plan (2021) policy D5 and can be secured by condition.
- 8.121 The HSE raised some concern regarding the clarification of fire service access and hose laying distances, tenability within the firefighting stair, lobbies and corridors, the enclosed amenity room (33rd floor) and fire-fighting access. However, upon the review of the amended fire safety statement the HSE is content with the fire safety design to the extent that it affects land use planning.
- 8.122 No objection has been raised from the HSE and separate regulation (Building Control) approval will be required for these elements, so the scheme is considered acceptable in terms of fire at this planning stage. In addition, the Councils Principal Building Control Surveyor has reviewed this statement and is content that the detailed fire design is suitably flexible to allow for any changes should this be needed at the detailed design stage post-planning.

Accessibility

- 8.123 11% (49 units) would meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and the remaining units would meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and therefore satisfy Policy D7 of the London Plan and will be secured by condition. It is important to note that the M4(3) units are pepper potted through the different blocks. This approach is logical as the blue badge parking is all located within the basement which is accessible across all stair and lift cores.
- 8.124 Overall, the proposed development would provide well-designed homes that would provide a high standard of residential accommodation.

Impact on neighbouring amenity

- 8.125 Policy DM10.6 states that the Council will not support development proposals which would have adverse effects on the amenities of adjoining or nearby properties or have an unacceptable impact on the surrounding area. This can include a loss of privacy, daylight, sunlight, outlook or an increased sense of enclosure. There are a number of buildings surrounding the site requiring consideration in terms of daylight/sunlight impact. This aligns with the requirements of Policy D9 of the London Plan in relation to tall buildings.
- 8.126 Paragraph 6.80 of the Croydon Local Plan states "*A minimum separation of 18-21m between directly facing habitable room windows on main rear elevations is a best practice 'yardstick' in common usage and should be applied flexibly, dependent on the context of the development to ensure that development is provided at an acceptable density in the local context*".
- 8.127 The Housing Design Standards LPG (2023) states that, the orientation and massing of buildings, and the separation distances between them, should ensure that the public realm is not unduly overshadowed to the detriment of health, wellbeing, biodiversity or amenity. Where demonstration is necessary and/or a building over 30 metres high is proposed, a micro-climate/wind/daylight and sunlight assessment should be submitted.
- 8.128 The Housing Design Standards LPG (2023) states that, the orientation and massing of buildings, and the separation distances between them, should ensure that the public realm is not unduly overshadowed to the detriment of health, wellbeing, biodiversity, or

amenity. Where demonstration is necessary and/or a building over 30 metres high is proposed, a micro-climate/wind/daylight and sunlight assessment should be submitted.

Outlook and Privacy

- 8.129 The Towers and Villa Block towards the north would be sited approximately 27m to 38m from Harrington Court which lies to the north on the opposite side of Hazledean Road. The Villa Block would be sited approximately 29m from 13 Addiscombe Grove to the northeast and approximately 18m from Longitude Apartments to the west, with the Towers providing a separation of approximately 27m from Longitude Apartments. The Towers and Villa Block would be sited approximately 65m to 67m from Latitude Apartments to the south and 35m to the southeast where Latitude Apartments returns north up Addiscombe Grove.
- 8.130 The Mansion Block would be sited approximately 37m from Latitude Apartments to the east and reduces down to 9m to the southeast where Latitude Apartments returns along Barclay Road. The windows at the closest point (9m) are angled away from each other and therefore given the orientation would not result in any overlooking or loss of privacy that would warrant a refusal of planning permission. The Mansion Block would be sited approximately 7m from Altitude 25 to the south but would sit adjacent to its blank façade, which extends up to the 9th floor as Altitude 25 was built when Croydon Park Hotel was in situ.

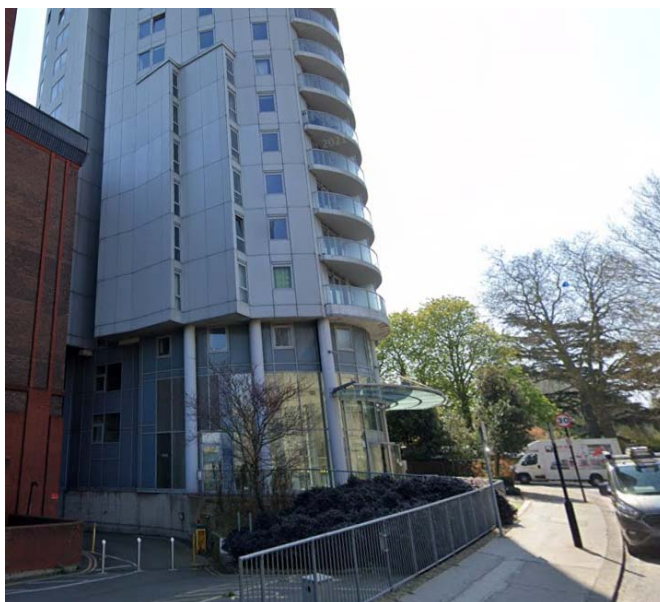


Figure 49: blank façade of Altitude

- 8.131 To the west of the site lies the Law Courts which by their nature do not contain any residential properties. A community building lies to the north-west which is known as the Christian Science Church which is not residential in use. An appropriate degree of separation would exist between the proposal and the Christian Science Church to ensure that adequate privacy would be provided for the new development.

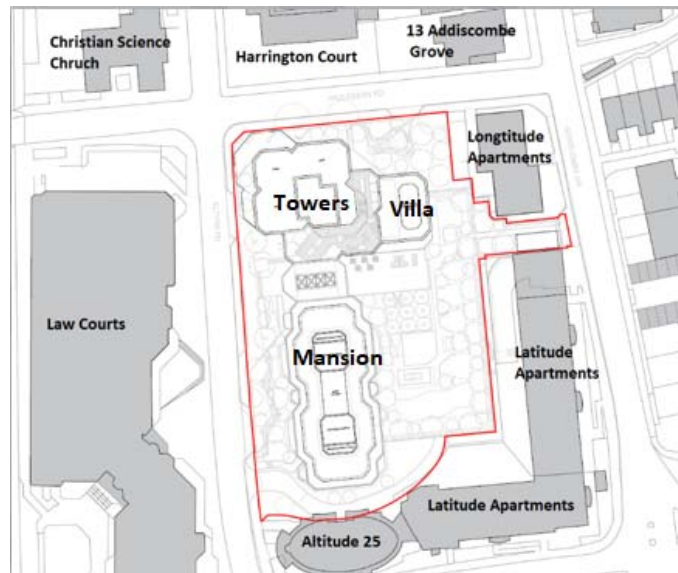


Figure 50: proposed site plan in relation to neighbouring buildings

- 8.132 Overall, given the density of the surrounding built form and closely related development in a central location it is expected that there will be a degree of mutual overlooking and visual impact for occupiers, orientation of windows and separation distances in excess of 18m acceptable levels of outlook and privacy would be achieved and maintained.

Daylight and Sunlight

- 8.133 Paragraph 125 of the NPPF states, in part c) that *“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, 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)”*.
- 8.134 The Mayor of London’s Housing SPG also endorses a flexible approach to daylight and sunlight, stating:

“An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time... The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.”

- 8.135 Furthermore, the OAPF notes that *“It is recognised that in heavily built up areas such as the Croydon Opportunity Area, new development will inevitably result in some level of overshadowing and overlooking of neighbouring properties and amenity spaces. It should be noted that the existing pattern of development in the central part of the COA is not conducive to the application of normal planning guidelines for sunlight and daylight. As such, as part of new development proposals, there will need to be a flexible approach to the protection of natural light for existing properties.”*

- 8.136 The Housing Design Standards LPG (June 2023) states that the *“most favourable orientation for each new building will be heavily influenced by the site-specific opportunities and constraints. Layouts should optimise the orientation of new buildings to maximise the quality of daylight and thermal comfort for residents, minimise overheating, and optimise thermal efficiency, by utilising and controlling solar gains”*.
- 8.137 It should be noted that the BRE does allow for alternative targets. In this case an alternative target (15% VSC) has been set for the purpose of this assessment due to the density of the site. Through a number of planning applications and appeals it has been established that alternative targets may be set having regard to site context, with 15% VSC being an appropriate benchmark. This is considered appropriate for this site.
- 8.138 The applicant has submitted a sunlight and daylight report that has been carried out in accordance with 2022 BRE guidance. This report has been reviewed by the Council’s daylight and sunlight consultant, who conclude that the methodology and application of the guidelines is appropriate.
- 8.139 The report applies the BRE standard numerical guidelines for daylight and sunlight to existing surrounding buildings. The following properties satisfy the BRE guidelines:
- 93 Granville Close
 - 86-90 Granville Close
 - 104-106 Granville Close
 - 138 Granville Close
 - 13 Addiscombe Road: Experiences a significant reduction but is not believed to contain residential units.
 - Croydon Crown Court: Experiences a significant reduction but does not contain residential units.
- 8.140 The neighbouring properties that have the potential to experience a reduction in daylight and sunlight beyond the BRE guidelines are Harrington Court and Latitude apartments (noting that Altitude 25 and Longitude apartments were considered under Latitude apartments) discussed in more detail below.

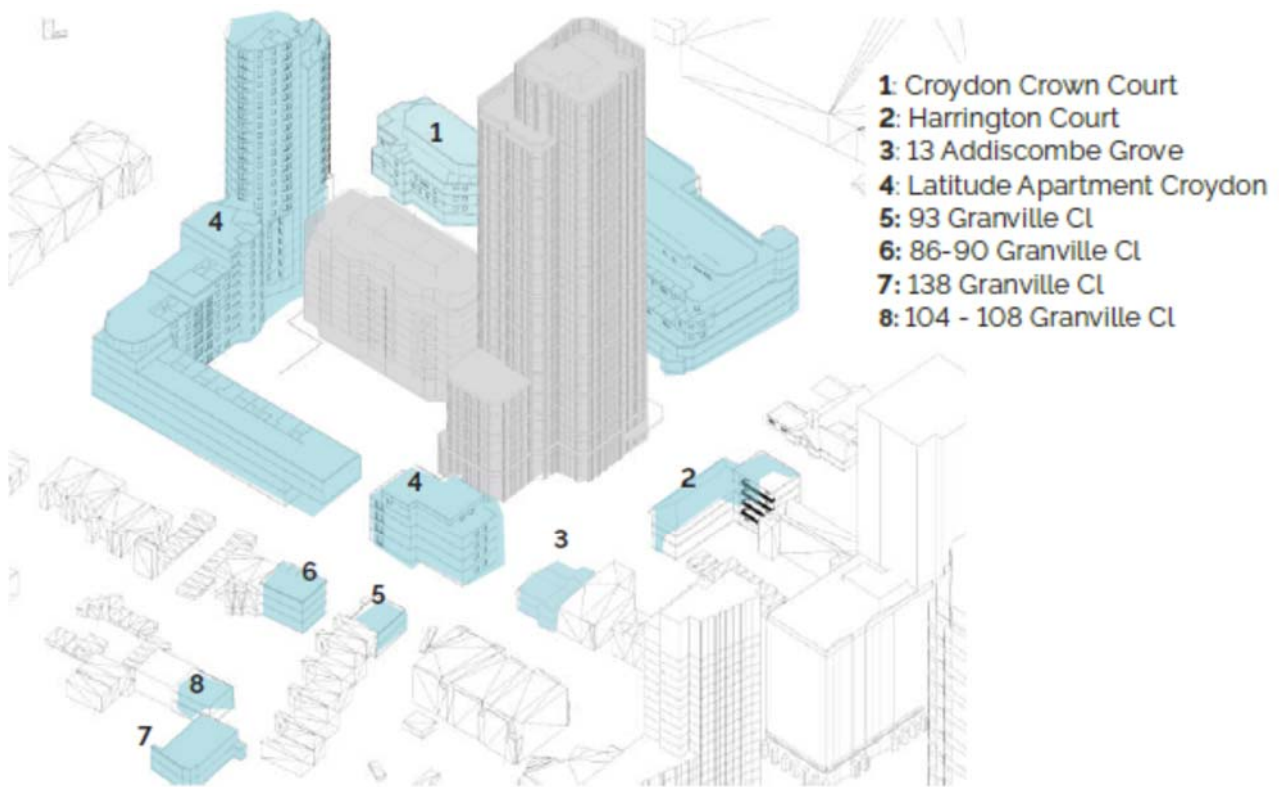


Figure 51: 3D view of the model used to show surrounding buildings

Harrington Court

- 8.141 This is the three-storey residential building located to the north of the development site which has been based on assumed layouts.
- 8.142 In terms of daylight, 72 windows were assessed using the Vertical Sky Component (VSC) test – see Appendix 2. Of the 72 windows tested, 39 (54%) remain BRE compliant. Of the 33 windows that fall below the BRE guidelines, 4 will experience a moderate adverse impact, while 29 will experience a major adverse impact seeing a reduction greater than 40% (the most impacted window has a reduction of 48%, with the lowest actual VSC being 15.01%).
- 8.143 If an alternative target of 15% of VSC is applied, which officers feel is appropriate, the results show that 100% of the windows tested will comply.
- 8.144 In terms of daylight distribution, 46 rooms were assessed using the No Sky-Line test (NSL) – see Appendix 2. Of the 46 rooms assessed, 34 (74%) would experience no noticeable alteration in daylight distribution. Of the 12 rooms that do not comply, 3 rooms would experience a moderate adverse impact, with 9 rooms experiencing major adverse impacts (reductions greater than 40%).
- 8.145 In terms of sunlight, 46 rooms have been assessed using the Annual Probable Sunlight Hours test (APSH) – see Appendix 2. Of the 46 rooms assessed, 40 (87%) remain BRE compliant. There are 6 rooms achieving APSH below the recommendations; these are all located in the upper floor of Harrington court where there is an existing roof overhang, which is an inherent design limitation which would contribute to a lower achieved value. Generally, the APSH results show that all rooms considered will meet the alternative target values.

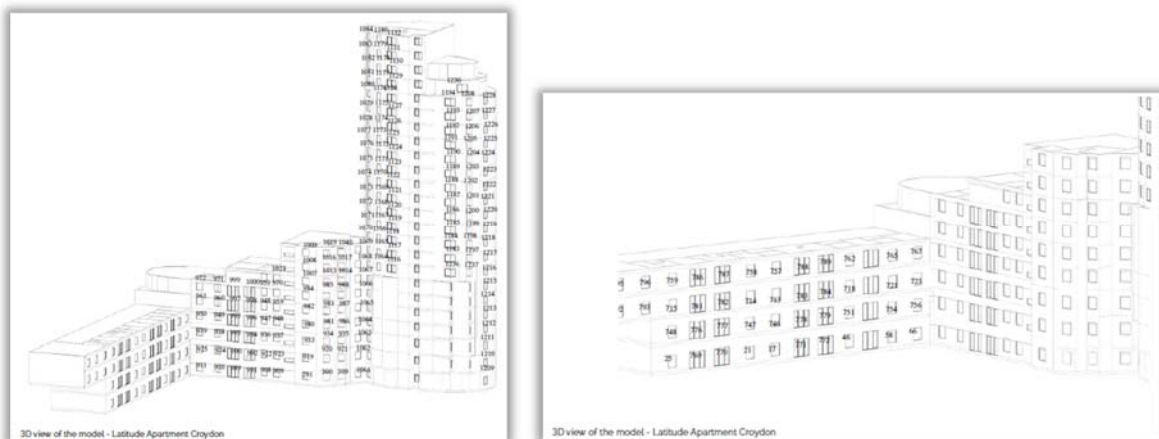
8.146 Overall, the latest scheme massing marginally reduces the daylight and sunlight impact on this property. Several windows have the potential to experience a significant reduction beyond the BRE guidelines, but all windows maintain a mid-teen VSC.

Latitude Apartments (including Altitude 25 and Longitude apartments)

8.147 These are the three residential blocks located directly to the east and south of the development site. They range from 4 to 25 storey in height. The northern block of the three (Longitude apartments) has protruding balconies which obstruct the passage of daylight and sunlight.

8.148 In terms of daylight, 293 windows were assessed using the VSC test. Of the 293 windows tested, 242 (83%) remain BRE compliant. Of the 52 windows that fall below the BRE guidelines, 27 will experience a minor adverse impact beyond the BRE guidelines, 6 a moderate adverse impact and 19 a major adverse impact. Of the 293 windows, 272 (93%) retain a VSC of at least 15%. With the exception of 4 homes with a VSC under 10%, the remaining windows retain a VSC of at least 10% post-development.

8.149 There are four scenarios where a VSC under 10 occurs, with a lowest overall VSC of 5.93 and the greatest overall reduction in VSC of 58%. These are all generally within the rear elevation of Longitude apartments and the western elevation of Latitude apartments where the block turns the corner and fronts Addiscombe Road.



Figures 52 and 53: windows to Latitude Apartments (shown to include Altitude 25)

8.150 In terms of daylight distribution, 263 rooms were assessed using the NSL. Of the 263 rooms assessed, 238 (90%) would experience no noticeable alteration in daylight distribution and satisfy BRE. Of the 25 rooms that do not comply, 16 would experience a minor adverse impact, 7 a moderate adverse impact, with 2 rooms experiencing major adverse impacts (reductions of 46% and 56% - both units are within the rear elevation of Longitude apartments).

8.151 In terms of sunlight, 263 rooms have been assessed using the APSH test. Of the 263 rooms assessed, 243 (92%) remain BRE compliant. There are 20 rooms achieving APSH below the recommendations for sunlight during the year; these are generally located in the rear elevation of Longitude apartments and a number of windows in the northern elevation of Latitude apartments. Of these 20 rooms that fail, 5 are LKD while the remaining 15 are bedrooms, where there is a lower expectation of sunlight.

8.152 Overall, the revised massing appears to reduce the daylight and sunlight effects to this property when compared to the original scheme. The proposed scheme will cause a noticeable alteration in daylight to this building, which is regrettable and must be given weight, but is not unexpected given its proximity to the site.

Sunlight to neighbouring amenity spaces

- 8.153 19 neighbouring amenity areas are considered within the assessment, making up a combination of residential gardens (both front and rear, private and communal), as well as spaces in front of non-domestic buildings.



Figure 54: amenity areas assessed

- 8.154 Of the 19 amenity areas, 18 satisfy the BRE guidelines. The one area that falls below the suggested BRE guidelines is a car park located to the north of the Croydon Crown Court building, which is non-residential. Overall, the report indicates that the proposed scheme will only have a negligible effect on the neighbouring amenity areas.

Daylight and sunlight conclusion

- 8.155 The properties that would experience noticeable daylight and sunlight effects are Harrington Court and Latitude Apartments, but the revised massing reduces the overall effects to these properties. There are residential dwellings in both properties that directly face the development site and due to the extent of the proposed massing a reduction beyond the BRE guidelines is expected.
- 8.156 The proposed scheme will cause a noticeable alteration in daylight and sunlight to these buildings, particularly Longitude and Latitude apartments which is regrettable and must be given weight but is not unexpected given its proximity to the site. Taking into account the opportunity area location, the relatively dense urban environment, the fact the brownfield site contains a vacant building and the policy steer to apply application of the BRE guidance flexibly, when balancing the benefits of the scheme against the harm of these impacts, officers raise no objection.
- 8.157 There will be no significant adverse effect on sunlight to back gardens or amenity spaces.

Microclimate

- 8.158 Paragraph 6.71 of the Croydon OAPF states that new buildings, in particular tall buildings, will need to demonstrate how they successfully mitigate impacts from microclimate conditions on new and existing amenity spaces. In particular, new tall buildings in the COA will need to show how their designs do not have a negative impact on wind (downdrafts and wind tunnelling). This is endorsed in DM38.4 of the Croydon Local Plan and D9 of the London Plan.

- 8.159 A wind report has been submitted in support of the application that reviews the impact of the proposal on nearby and surrounding land and has been independently review by the Councils Wind Consultant, GIA. The land to the north-western of the interlocking towers and the ramp down to the basement had previously identified unsafe conditions while concerns existed in respect of the wind conditions of the roof terrace, on the 33rd floor.
- 8.160 The amendments to the proposal as part of this application have sought to address these concerns through the following mitigation:
- a. Siting the mansion block further back from Altyre Road by approximately 1.8m;
 - b. The introduction of two permanent wind screens at the ground floor as part of the overall landscaping proposals close to the north-western entrance;
 - c. The introduction of a canopy to the ground floor north-western entrance at the junction of Hazledean Road and Altyre Road;
 - d. The relocation of the roof top terrace, at the 33rd Floor, to the eastern side of the interlocking towers and the introduction of wind screen around the periphery of the roof top terrace;
 - e. No pedestrian access via the ramped access to the basement.
- 8.161 All wind mitigation is provided through permanent and fixed structures and are capable of being secured through an appropriately worded planning condition. There are no soft landscaping features that are proposed as wind mitigation and therefore Officers have no concerns over the provision and retention of such mitigation features.
- 8.162 The applicant's Wind Assessment, the independent Review and third parties raised concerns regarding the undesirable wind condition at the corner of Barclay Road and Addiscombe Road, to the east immediately outside of Latitude Apartments (nodal point 89). Through wind tunnel modelling this corner position shows existing uncomfortable walking conditions. The application before Members does not make this position any worse and therefore there would be no greater concerns in regard to public safety; this position has been supported by the Council Consultants.

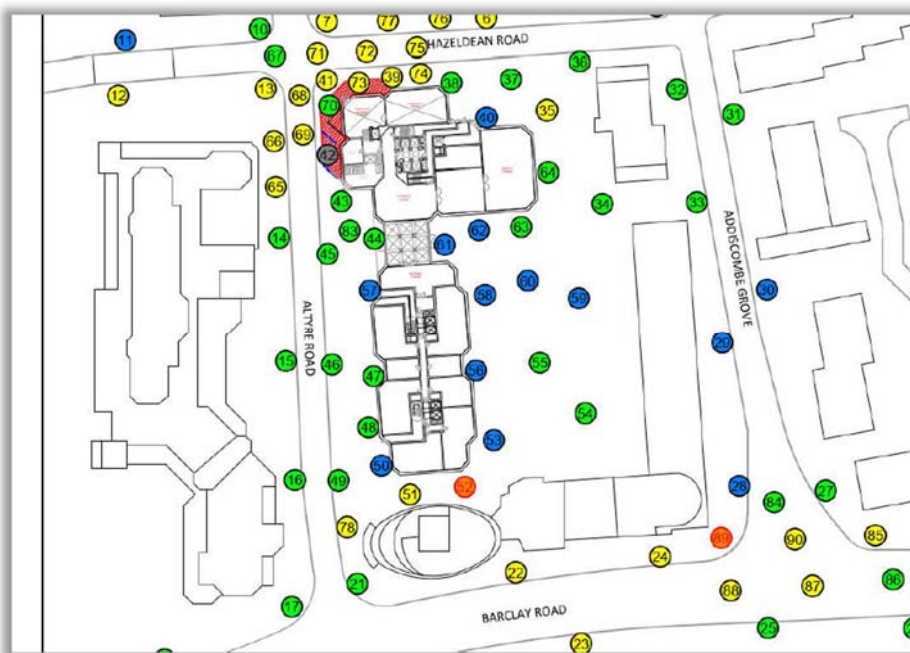


Figure 55: proposed wind conditions in relation to nodal point 89

8.163 Subject to securing the permanent wind mitigation through an appropriately worded conditions Officers are satisfied that the proposal would not result in any additional risk to public safety and would provide an acceptable environment in relation to wind.

Noise and disturbance

8.164 London Plan policy D13 Agent of change is relevant in relation to some neighbouring commercial businesses. Croydon Local Plan policy DM23 seeks to limit noise disturbance through high standards of development and construction.

8.165 Whilst population density would increase, the development is not considered to result in a harmful increase in noise and disturbance. A new outside space would be created at ground floor in a courtyard arrangement but is not considered to harm amenity from a noise perspective given the previous use of the site as hotel and the existing public car park use to the north. Moreover, this is a built-up urban area, and a degree of noise and disturbance is not uncommon.

8.166 During construction there would undoubtedly be an impact on neighbouring occupiers, including the Law Courts and other nearby community and commercial buildings. A construction logistics plan would ensure the build-phase is managed appropriately, minimising disturbance towards neighbouring properties, and can be secured by condition. Furthermore, disruption due to construction is only temporary, limited to the site and is of medium-term duration.

Access, parking and highway impacts

8.167 The site has a Public Transport Accessibility Level (PTAL) of 6b, on a scale of 0-6b, where 6b is the most accessible, so has an excellent level of accessibility to public transport links.

8.168 The site has existing vehicular access points from Hazledean Road to the north (serving the public car park) and Altyre Road to the west (an in and out under the hotel canopy for drop off, some parking and access to the existing basement), with a separate pedestrian access provided to the east onto Addiscombe Road. The access to the north currently provides access to a public car park which is still in operation while the accesses onto Altyre Road and Addiscombe Road have not been in operation since the closure of the hotel. The site lies within a controlled parking zone with pay and display bays (limited to a maximum of 2 hours) within Hazledean Road and Altyre Road.

Access: Vehicular

8.169 The existing former hotel contains 211 bedrooms while the site also incorporates the Hazledean Road car park which is currently in use and, according to the operators of the car park, currently provides up to circa 110 spaces for use by the public as a 'pay by mobile' car park at any time Mondays to Sundays.

8.170 When the site was operational vehicles accessing the hotel as well as the public car park would access the car park within the basement and via a dedicated ramp to the south along Altyre Road, with the public car park operating at both basement and ground floor levels. The hotel would be serviced onsite with dedicated areas within its forecourt along Altyre Road with additional coach parking and/or set down and pick up areas. The proposal seeks to retain some basement parking (for disabled users only) while the car park to Hazledean Road would be removed to accommodate the Villa Block and pocket garden.

8.171 The basement would accommodate 13 parking spaces for disabled users only with the remainder of the basement footprint given over to plant, refuse and cycle storage. A

dedicated cycle lift would be provided to the north-western corner of the basement with a dedicated cycle wash area. A small vehicle servicing bay is provided at basement level.

- 8.172 The basement would be retained with access from Altyre Road around the south of the building. This vehicular access onto Altyre Road would be realigned to the southern end of the site to take account of the Mansion Block and this would result in the need to redesign the ramp to the basement area. This would result in a 1:20 gradient for the first 5m and is considered suitable to provide access from the highway which sits at a higher level than the application site. Further details were requested by Council Officers during the course of the application to demonstrate that such an area would be suitably accessible. In addition, the width of the access has been reduced to a maximum of 5m and the applicant has confirmed that appropriate sight lines and pedestrian visibility splays will be provided (and secured via condition). To ensure that vehicles can pass one another freely on the access ramp a traffic light system would be installed and secured via an appropriately worded condition. Such measures would ensure that there would be no holding up or obstructions on the highway, achieving the highest safety standards.
- 8.173 The development would be served by a new on street loading bay with the public footpath (at a minimum width of 2m) re-routed around and into the application site. S.38 and S.278 highways agreements will be required to facilitate and deliver these works, with the Council adopting the realigned footpath as part of the highway. The realignment of the footway has been reviewed by strategic transport and highways colleagues and is considered acceptable and adheres to the comments received from TfL.
- 8.174 The existing crossover to Hazledean Road would be reinstated, so dropped kerb removed, secured under S.278 agreement. It is proposed to install the car club bay in this location, so there would be no loss of car parking facilities within Hazledean Road. The provision of the car club bay and 3-year membership for future residents would be secured through the S.106 legal agreement.

Access: Pedestrian

- 8.175 Pedestrian access is proposed on Hazledean Road to the community space on the north-western corner of the site. The main residential entrance to the building would be from Altyre Road, between the Towers and Mansion Block, with a secondary access to the Mansion Block at the southern end. Gated and secure access would also be provided to the east along Addiscombe Grove adjacent to the onsite sub stations.
- 8.176 All pedestrian entrances have been designed to be step free. There would be no pedestrian access provided via the basement ramp to the south end of the site due to issues of wind speed on the ramp. However, the cores within the Towers and Mansion Blocks would contain lifts that would provide access to the basement level.

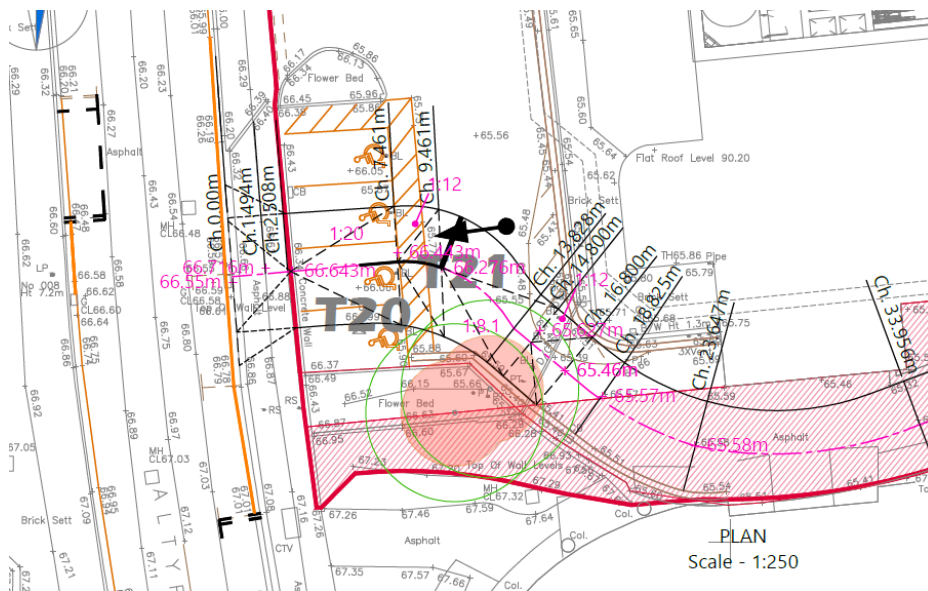


Figure 56: access details in relation to the realigned crossover

Car parking

- 8.177 Given the PTAL of this location, aligning with London Plan Policy T6 and SP8 of the Croydon Local Plan, a car free development is supported. The Croydon Local Plan states that there is an on-going climate emergency and active and sustainable travel, in order to reduce congestion and air pollution, will be encouraged in order to improve quality life and quality of place.
- 8.178 There will be a substantial decrease in car parking within the site given it would be car-free, with the exception of 13 blue badge spaces at basement level. The proposal aims to decrease the usage of vehicles to minimise its contribution to air pollution and to encourage sustainable modes of travel.
- 8.179 A public car parking survey was undertaken as part of the application which showed that the Hazledean Car Park was underutilised and that there were other public car parks in the CMC that had capacity and were better located. This complies with DM30 of the Croydon Local Plan.
- 8.180 Policy T6.1 of the London Plan requires disabled persons parking to be provided for new residential developments, ensuring as a minimum 3% of dwellings at least one designated disabled persons parking bay per dwelling is available from the outset. The proposed scheme would provide 3% blue badge, which equates to 13 parking bays. Further to comments received from the LBC Transport Officer, amended plans have been received to show suitable size and manoeuvring from these spaces. There is some (albeit relatively limited) space within the basement where current blue badge spaces avoid columns, and the less accessible cycle parking is located that could be repurposed for additional blue badge spaces if there was future demand. It is important to note that the 10% provision of 44 blue badge spaces could not be accommodated with the current layout. No objections have been raised by Transport for London or the LBC Transport Officer in this regard, so a condition is recommended to secure a car parking management plan.
- 8.181 Policy T6.1 of the London Plan 2021 states that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of the spaces should have active charging facilities, with passive provision for all remaining spaces. Such details are capable of being secured at the condition stage while the TS confirms that the applicant will achieve the standards set out in the London Plan.

Cycle parking

- 8.182 The proposed development would be dedicating the majority of the basement space to cycle parking, encouraging a more sustainable mode of travel. The minimum requirement, as set out in the London Plan, is for 734 long stay spaces and 13 short stay spaces. It is proposed that the development would provide 734 long stay spaces of which 38 would be adaptable spaces at a split of 5% adaptable, 20% Sheffield Stands, and 75% two tier stands. The nature and quantum of cycle parking is considered acceptable given the confines of the existing basement while offering an appropriate choice of storage for future residents.
- 8.183 During the course of the application amendments have been received in relation to the cycle parking layout in the basement area to relocate the adapted cycle storage closest to the cycle lifts, while increasing the door widths from 900mm to a minimum of 1200mm, allowing for better access. A cycle wash facility is provided with the basement area as well as a cycle WC/changing area which would actively promote cycle use; the applicant has confirmed that these facilities could also be available to the community use should there be demand.
- 8.184 Provision is made for a dedicated cycle lift sited adjacent to the main residential entrance on Altyre Road. This would provide access to the basement cycle parking for all residents, and they can then access all cores to get up to their homes via lift of stairs depending on where they live in the building. The cycle lift dimensions comply with the London Cycle Design Standards, and during the course of the application door widths have been increased to allow ease of use for cyclist pushing their bikes. While it is noted that some cyclists would have to pass through more than two doors to access some of the cycle storage areas these routes have been minimised where possible while working with the confines of the existing basement structure.



Figure 57: basement plan of northeast corner showing dedicated cycle lift

Waste

- 8.185 The applicant has submitted an Operational Waste Management Strategy. The applicant has estimated the weekly waste generation for the development and the number of containers required would fit within the waste stores. The metrics that have been used are in accordance with LBC's Waste and Recycling in Planning Policy Document. Each core would be served by refuse chutes which will be monitored and

managed by on site management. Given the height of the development and the Build to Rent nature (which is required by policy to have on-site management in place as opposed to market sale developments where there is no such requirement) this arrangement is considered acceptable by Officers. The refuse bins will be located within the basement area and will be brought up to ground level on the day of collection and collected from the servicing bay on Altyre road. Officers have sought amendments to increase the width of the doors to the refuse storage area at ground floor level and are now satisfied that the doors width would now allow convenient access on collection days.

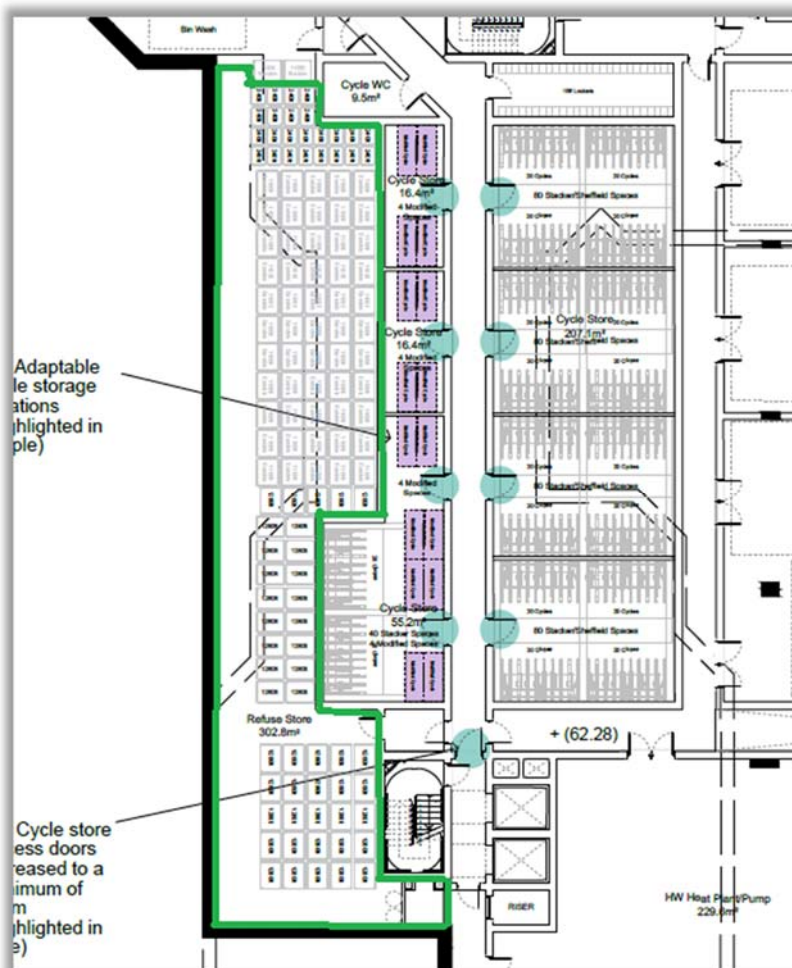


Figure 58: bin store location within the basement (outlined in green)

8.186 The collection area for the bins at ground floor level would be adjacent to the main residential entrance on Altyre Road. As the number of bins required for the non-residential areas are minimal and are spaces that are typically shared with residents, a combined space is considered appropriate in this instance given the build to rent nature of the proposal. The waste management plan would be conditioned upon any approval and would therefore be enforceable.

Delivery and servicing

8.187 An Outline Delivery and Servicing Plan (DSP) has been submitted as part of the application and forms part of the Transport Statement. Deliveries and servicing trips are proposed to take place via the servicing bay along Altyre Road with deliveries estimated to take no more than 20 minutes. A smaller service space has been provided within the basement level where a dedicated parking bay can be found. The TS identifies that estimated trips would amount to approximately 36 per day with many of those trips expected to be undertaken by motorcycle and/or via transit sized vehicles. Officers do not dispute the figures put forward by the applicant; these figures have been reviewed

by the LBC Transport Officer and TfL have advised that the figures are similar to other comparable sites within close proximity of the site. The scheme would be acceptable in this regard.

Construction logistics

- 8.188 Given the scale of the development, a tailored condition requiring the submission of a detailed CLP is recommended to ensure that the construction phase of development does not result in undue impacts upon the surrounding highway network and adjoining occupiers.

Mitigation

- 8.189 Sustainable travel is a key policy consideration within policies SP8, DM29 and DM30 of the Croydon Local Plan. Given that the development would be car-free (aside from blue badge spaces) and considering the nature of the development, increased walking, cycling and public transport use is expected. To mitigate against this and improve connections for all transport modes, improvements to the highway network immediately surrounding the site in line with the Council's future vision for the area are to be secured. This would be secured through a S.106 financial contribution of £491,700 and a S.278 highway works agreement. A contribution of £550,000 as requested by TfL, will also be secured via the S.106 legal agreement.

- 8.190 The applicant has agreed to provision of a car club bay on Hazledean Road where the current access to the car park is located. Membership for future residents of the scheme to a car club operator for 3 years will be secured, as well as removing access for future residents to Controlled Parking Zone permits and season tickets for Council car parks.

Active Travel Zone (ATZ)

- 8.191 The applicant has identified some potential upgrades to the local highways network as part of their public benefits package to support the development. The improvements have been identified in 2 key routes between East Croydon and South Park Hill Park and west to east along Hazledean Road. The improvements that have been outlined within the application will be funded by the applicant through a S.278 agreement and wider legal agreement. Members raised at Planning Committee about the key linkage to Park Hill Park. Accordingly, officers have secured a sustainable transport contribution of £491,700, a portion of which can go towards improvements to the crossing over Barclay Road at the end of Altyre Road.

- 8.192 The applicant has agreed to fund resurfacing of the public footpath on all pavements around the site, the provision of the servicing bay on Altyre Road and re-routing of the pedestrian footpath around it into their site (secured through S.278 and S.38 agreement necessary), relocation of on-street parking bays including the car club bay, reinstatement of dropped kerbs and provision of new where necessary, as well as a sustainable transport contribution (in part towards the Barclay Road pedestrian crossing improvement works) and tree planting along Altyre Road (a minimum of 7 trees to a value of £7,840).

Travel Plan

- 8.193 In order to ensure that the identified modal shift is adequately supported, and barriers to uptake of more sustainable transport modes can be addressed, a Travel Plan and monitoring for five years along with a financial contribution to allow this is to be secured through the S.106 legal agreement.

Environmental impact

Air quality

8.194 The whole of Croydon Borough has been designated as an Air Quality Management Area and therefore a contribution is required towards local initiatives and projects in the air quality action plan which will improve air quality targets helping to improve air quality concentrations for existing and proposed sensitive receptors.

8.195 The Councils Environment Consultant has raised no objection to this aspect of the proposal subject to securing a contribution (£44,700) and the recommendations within the air quality assessment being followed. These can be secured by S.106 and condition.

Contamination

8.196 Croydon Local Plan policies DM24.1 to DM24.3 relate to land contamination and development proposals located on or near potentially contaminated sites. Such sites need to be subjected to assessments and any issues of contamination discovered should be addressed appropriately e.g. through conditions.

8.197 The majority of the site is covered by built form of a commercial nature and the proposal includes amenity areas that are effectively covered by existing built form. The applicant advises that a walk-over survey was undertaken on 18th October 2022 to assess current use, surface conditions and visually inspect any available evidence of contamination such as asbestos debris, staining or waste drums, tanks etc. Internally there was no evidence of any surface contamination or asbestos debris or staining on the lower ground floor. No waste drums or fuel or heating oil storage tanks were evident within the building. Externally in the under-croft parking area there was also no evidence of surface contamination. The entire perimeter of the building was inspected, and no waste drums were identified, and no fuel or heating oil storage tanks were evident. However, it would be prudent to require an intrusive site investigation, which can be secured by condition.

8.198 The applicant has undertaken a historic site review and research to establish whether there are any dangerous or hazardous sites within 500m of the site; no such uses have been identified. The Councils Environmental Specialists have been consulted regarding the application and have raised no in principal objections to the proposals. However, it would be prudent to require an intrusive site investigation, which can be secured by condition.

Flooding and drainage

8.199 The site is within Flood Zone 1 (low risk) and an area of surface water flood risk. The majority of the site has a low-level risk of surface water flooding.

8.200 The site-specific flood risk assessment indicates levels on the northern elevation on Hazledean Road vary between 65.17m AOD to the east falling to 63.70m AOD to the west. Levels on the southern elevation on Barclay Road vary between 69.13m AOD to the east falling to 68.03m AOD to the west. Levels on the eastern elevation on Addiscombe Grove fall from 9.13m AOD on Barclay Road to 65.17m AOD on Hazledean Road. Levels on the western elevation on Altyre Road fall from 68.03m AOD on Barclay Road to 63.70m AOD on Hazledean Road. Levels of the of the under-croft carpark vary between 62.85m AOD and 62.68m AOD. The carpark is accessible via ramped access points on Hazledean Road and Altyre Road.

8.201 The applicant states the ground conditions (revealed by the historic British Geological Survey borehole information of adjacent sites) display varying thickness of made ground overlying dense brown sands of varying thickness overlying varying thickness of London Clay. A borehole to the south of the site encountered a layer of dense brown clayey Thanet Sands below the London Clay some 14m below ground level overlying very

weak Chalk some 26.8m below ground level. According to the EA website, the site does not lie within a groundwater source protection zone. The nearest source protection area is approximately 1.7 km to the southwest. The existing site is approximately 6,647m², where 5,873m² is impermeable.

8.202 The applicant has demonstrated that the site is at an actual low level of surface water flooding due to underlying geology and the existing built environment. In terms of ground water, the site is not at risk from this source of flooding and no such events have been reported within the vicinity of the site. The Environment Agency were consulted regarding this proposal given its strategic nature but have advised that they do not feel that such consultation is necessary. The LPA have consulted with the Local Lead Flood Authority and initial concerns have been addressed following the receipt of amended documentation.

8.203 The applicant has provided a Flood Risk Assessment and Drainage Strategy. This document states that, Opportunity exists to provide betterment over the existing situation through the introduction of SuDS. The existing and proposed building footprints mostly occupy the entire site area meaning there is limited scope to introduce attenuation SuDS features such as ponds or swales. Additional constraints limiting attenuation SuDS features are the numerous trees and associated root protection zones located on the Altyre Road and Hazledean Road. All surface water from the proposed development will continue to be discharged to a public surface water sewer at a restricted rate of 2.0 l/sec. It is proposed that runoff from each part of the development will be afforded an element of treatment and flow attenuation prior to leaving the site. This will be achieved via a series of source control features such as green roofs and permeable paving secured through the landscaping masterplan. Underground attenuation storage tanks will also be provided under the landscaped areas and servicing layby to the west and pocket garden to the north of the development. It is proposed to attenuate surface water using a combination of green roofs, filter drains, pervious hardstanding and attenuation tank located between and adjacent to the external stair access from the courtyard to the basement.

8.204 The Lead Local Flood Authority have reviewed and assessed this information against the flooding hierarchy and raise no objection to this aspect of the scheme. Additionally, Thames Water have reviewed the information and raise no objection, but do recommend conditions and informatives, which are included within the recommendation.

Construction Impacts

8.205 A Construction Environmental Management Plan is to be secured by a condition, to ensure adequate control of noise, dust and pollution from construction and demolition activities, and to minimise highway impacts during the construction phase.

Light pollution

8.206 External lighting is proposed around the development, but a final scheme has not been developed. Whilst the principle of this is acceptable light from the proposed illuminations can cause a nuisance to local residents and as such further details indicating proposed light specifications, spread and lux levels is required, these details can be secured by condition.

Microclimate

8.207 Croydon Local Plan policy SP4.6 states that tall buildings will be required to minimise their environmental impacts. Paragraph 6.71 of the Croydon OAPF states that new buildings, in particular tall buildings, will need to demonstrate how they successfully mitigate impacts from microclimate conditions on new and existing amenity spaces. In particular, new tall buildings in the COA will need to show how their designs do not have

a negative impact on wind (downdrafts and wind tunnelling). This is endorsed in DM38.4 of the Croydon Local Plan and D9 of the London Plan 2021.

8.208 The applicant submitted a wind report (dated March 2023) in support of the application that assesses the impact of the proposal on nearby and surrounding land. This has been independently reviewed by the Councils Wind Consultant, GIA. As a result of amendments to the scheme, a revised wind report (dated September 2023) was received during the course of the planning application.

8.209 The original wind report identified that the majority of the site would have wind conditions suitable for the intended uses. However, there were concerns in regard to wind speeds to the northwestern side of the Towers (nodal point 41) which extended into Hazledean Road, as well as along the access ramp (nodal points 51 and 52) to the basement on the southern edge. These are marked in red text in Figure 59 below. Within the scheme itself, concerns were raised in regard to wind conditions on the 38th floor external amenity as shown below in Figure 60 (nodal point 67). There were also concerns with the number of test areas (nodes) and further information was requested.



Figure 59: Wind speeds at ground level, prior to amendments

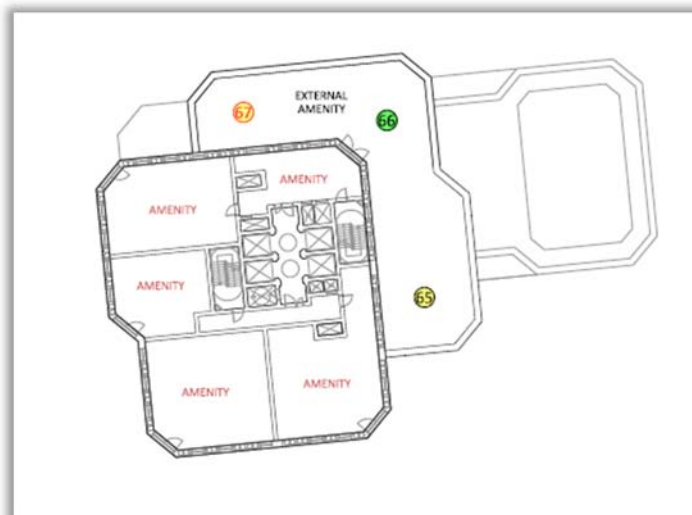


Figure 60: Wind speeds on the 38th floor, prior to amendments

8.210 During the course of the application officers worked alongside the applicant to improve wind conditions to ensure they were appropriate for their intended purpose. An amended wind report (dated September 2023) secured the following amendments:

- Further testing with the inclusion of additional nodal points;
- The re-siting of the mansion block 1.8m back from Altyre Road;
- The inclusion of a canopy to the community use entrance at the junction of Hazledean Road and Altyre Road;
- The inclusion of 2.5m by 2.6m 50% porous wind screens on the ground floor close to the north-western entrance as part of the overall landscaping scheme;
- Prohibiting pedestrians from entering the basement via the ramped access to the southern edge along Alyre Road and the provision of a dedicated cycle lift further north along Altyre Road; and
- The relocation of the roof top amenity space to the 33rd floor and the resitting of this area to the eastern side of the Towers and the introduction of a canopy and wind screen around the periphery of the roof top terrace.

8.211 As a result of the above amendments the areas of concern initially identified have been resolved and are now considered safe for occasional siting (with two exceptions identified in the next paragraph). All wind mitigation is provided through permanent and fixed structures and are capable of being secured through an appropriately worded planning condition. There are no soft landscaping features that are proposed as wind mitigation and therefore Officers have no concerns over the provision and retention of such mitigation features.

8.212 It is acknowledged that the wind conditions on the ramp remain unsafe for pedestrians (both uncomfortable during winter and wind speed marginally in exceedance of 15m/s at 15.1m/s) but the access to the basement is for vehicles only, and access for pedestrians have been designed out.

8.213 One further location where exceedances occur is at the corner of Barclay Road and Addiscombe Road, to the east immediately outside of Latitude Apartments (nodal point 89). This location is uncomfortable during winter and wind speed marginally in exceedance of 15m/s at 15.5m/s, so considered a minor exceedance. It is important to note that this exceedance occurs in the existing scenario (ie without the application scheme or cumulative) and is not made any worse by the proposal. It is likely that these wind conditions are caused by the massing of the Altitude 25 development.

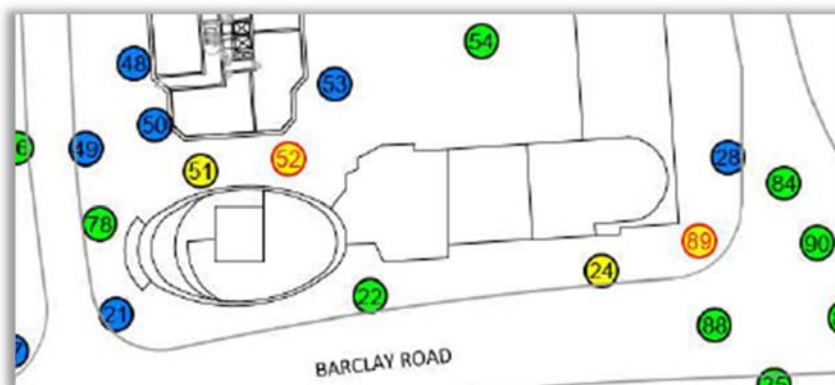


Figure 61: wind conditions on the corner of Barclay Road and Addiscombe Road post development of Croydon Park Hotel

Sustainable Design

Carbon emissions

- 8.214 Policy SP6.3 requires new development to minimise carbon dioxide emissions and seeks high standards of design and construction in terms of sustainability in accordance with local and national carbon dioxide reduction targets. This requires new build residential development over 10 units to achieve the London Plan requirements or National Technical Standards (2015) for energy performance (whichever is higher). In line with the London Plan (2021), new dwellings in major development should be Zero Carbon with a minimum on-site reduction of at least 35% beyond Building Regulations Part L (2013), with any shortfall to be offset through a financial contribution. Policy also requires the development to incorporate a site wide communal heating system and to be enabled for district energy connection (where one is proposed).
- 8.215 A 75% carbon emission reduction would be achieved through the use of passive and energy efficiency measures, exceeding the 35% minimum required by the GLA. Air Source Heat Pumps working in tandem with PV panels would seek to provide 90% of the energy requirements for the residential element and 95% of the community space. The development would achieve a 75% reduction compared over Part L 2013. The remaining regulated CO2 emissions shortfall would be covered by a carbon offset payment (£315,164) which would be secured through the S.106 agreement along with a 'Be Seen' monitoring clause.
- 8.216 Sustainable design and construction measures have been designed in where feasible, including measures to address overheating within the homes. An overheating analysis has also been undertaken, with some mitigation measures proposed. These matters are to be secured by condition. In addition to the prevention of overheating, high energy efficiency and fabric performance, the dwellings will also have a water consumption limit of 110 litres/person/day using water efficiency fittings and secured by condition.
- 8.217 A whole-life cycle carbon assessment and circular economy statement has been provided to capture the developments carbon impact, demonstrating how waste will be minimised and which actions will be taken to reduce life-cycle carbon emissions, in accordance with Policy SI 2 and SI 7 of the London Plan (2021).
- 8.218 The GLA has commented that the whole life-cycle carbon assessment is in line with London Plan Policy SI2, assessing the embodied and operational carbon associated with the proposed development. It identifies the key building elements with the highest embodied carbon and recommends measures to reduce these carbon emissions in terms of the superstructure, substructure, external facade, internal finishes and building services which are then compared to GLA benchmarks. The WLC assessment is acceptable and in line with the GLA's guidance. The application complies with London Plan Policy SI 2. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.
- 8.219 London Plan (2021) Policy SI 7 seeks to reduce waste and support the circular economy by conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal. The applicant has submitted a Whole Life Cycle Assessment. which addresses the policy requirements of Policy S1 7 while Officers at the GLA have reviewed this information and concur with the applicants' findings. The proposed development would therefore comply with the aforementioned policies and an appropriately worded condition to ensure compliance is recommended.
- 8.220 The Council's Sustainable Development and Energy officer has reviewed the application and raised no concerns or objection subject to appropriate condition and legal obligations.

Archaeology

8.221 The application site is not located within an Archaeological Priority Area however given the sites proximity to archaeological finds and/or remains in the wider CMC English Heritage were consulted regarding this application. London Plan Policy H1 and Croydon Local Plan Policy DM18 concerns development proposals on Archaeological Sites. Historic England have reviewed all evidence available to them and have concluded that no further reports or investigations are required and indeed no planning conditions are considered necessary.

Telecommunications and aircraft

8.222 A TV and Radio signal impact assessment was submitted with the application to investigate the possibility of television and radio interference and to provide the baseline reception data to assist with any further studies. Accordingly, impacts to the reception of VHF (FM) radio, digital terrestrial television (also known as Freeview) and digital satellite television services (such as Freesat and Sky) have been assessed. The report concluded that the proposed development is not expected to impact the reception of digital terrestrial television (DTT – known as Freeview) services.

8.223 However, the report did identify that the proposal is likely to cause disruption to the reception of digital satellite television services (such as Freesat and Sky) in areas to the immediate northwest of the site. Additionally, the report concluded that, in similar areas, the use of tower cranes could also obscure satellite dish views of the southern skies, resulting in interference. The report goes on to state that if interference does occur, the repositioning of impacted satellite dishes to new locations without obscured line-of-sight views to the serving satellites would restore all services. If that is not possible, the use of DTT receiving equipment could offer any affected satellite television viewer an alternative source of most digital television broadcasts.

8.224 Overall, the development may cause minor interference to digital satellite television reception in highly localised areas around the application site which can likely be mitigated by antenna betterment and repositioned satellite dishes, to be secured by the s.106 agreement. The development is not expected to affect the reception of radio and phone reception.

8.225 Tall buildings also have the potential to pose hazards to aircraft, and for this reason aviation bodies within this region have been consulted. None have raised concerns, subject to conditions and informatives (which have been included) and the development is therefore considered acceptable in this regard.

Designing out crime

8.226 A number of comments are made (as summarised in the consultation section of this report), but no objection has been raised by the Designing out crime officer and they do suggest a 'Secured by Design' related condition. On this basis a condition is recommended to ensure that the final development secures secure by design accreditation.

Employment and training

8.227 Croydon Local Plan policy SP3.14 and the Planning policy including the adopted Section 106 Planning Obligations in Croydon and their Relationship to the Community Infrastructure Levy— Review 2017 sets out the Councils' approach to delivering local employment for development proposal. The applicant has agreed to a contribution of £100,000 towards the construction phase, £6,770 for the operational phase and an employment and skills strategy.

Health

8.228 Policy DM16 of the Croydon Local Plan seeks to ensure promotion of healthy communities through the planning system. The proposal includes over 3,000sqm of communal and public amenity areas with generous areas of soft landscaping for outdoor sport and recreation with 0-4 and 5-11 year age groups catered for onsite with a financial contribution for over 12 play space off site. Access to amenity areas is bounded by staircases as opposed to lifts to promote active routes and choices while the scheme adheres to the FitWell 3 standard (research linking health and the built environment). The proposal promotes pedestrian and cycling infrastructure through dedicated cycle lifts and storage and encourages a 'green spine' linking East Croydon Train Station to Park Hill Park, by contributing the pedestrian crossing improvements on Barclay Road and funding of street trees, helping to improve air quality and making more sustainable transport modes more appealing, therefore promoting healthy communities. The response from Active Travel England was to refer to the comments of TfL; such comments are addressed above. The proposal has therefore been shown to accord with policies SP3 and DM16 of the Croydon Local Plan 2018.

EIA

8.229 An EIA Screening Opinion (22/04535/ENVS) was issued (11/11/2022) prior to the submission of the planning application. The development was not considered to require an EIA, taking account of its location, nature, scale and characteristics.

Conclusions

8.230 The amended scheme before you for consideration has been born out of multiple meetings and negotiations with the applicant team following on from advice from key stakeholders, including PRP and Planning Committee.

8.231 The development would not result in the loss of a protected use (hotel and car park). The 208sqm of community space (which has increased as a result of negotiations during the course of the application) is supported, with officers aware the developer has made contact with a wide variety of charity and local groups (evidenced by representations received) to ensure that the space is provided to meet the needs of a variety of possible end users.

8.232 The proposed development would introduce a significant amount of new housing, including affordable residential units, and in an area appropriate for a tall building. The proposed development would be well designed, provide active frontages delivering significant improvements to the public realm, regenerating a derelict and brownfield site within the Croydon Metropolitan Centre. There would be a good standard of accommodation for new residents. Wind conditions would be safeguarded with mitigation, to be secured by condition. With conditions and mitigation, the proposal would be sustainable and acceptable in terms of its impact on the highway network. Residual planning impacts would be adequately mitigated by the recommended s.106 obligations and planning conditions. Employment and training opportunities would be secured for residents of the Borough through the S.106 legal agreement.

8.233 There would be harm to the amenities of surrounding occupiers, particularly in relation to daylight and sunlight impacts to the flats within Harrington Court, Latitude and Longitude apartments which weighs against the scheme. There would also be some harm (less than substantial) to designated heritage assets as a result of the overall height of the Towers at 33 and 36 storey, but that harm is considered acceptable given the substantial public benefits being delivered by the scheme.

8.234 The public benefits of the scheme include:

- Regeneration of a derelict brownfield site in the OAPF
- Provision of 447 new homes (including 20% affordable, three-bedroom family and wheelchair accessible homes)
- 208sqm of community floorspace
- High quality design with active frontages and public art
- Public realm improvements (including pocket park, highway works and street tree planting)
- Contribution towards wider transport network improvements (particularly pedestrian and cyclist)
- Employment benefits from construction and operational phases

8.235 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).

APPENDIX 1: Drawing numbers

- Location Plan 001 Rev P01
- Existing Site Plan 002 Rev P01
- Existing Basement Plan 010 Rev P01
- Existing Ground Floor Plan 011 Rev P01
- Existing Typical Level Plan 012 Rev P01
- Existing North Elevation 020 Rev P01
- Existing West Elevation 021 Rev P01
- Proposed Site Plan 003 Rev P02
- Proposed North Elevation 0250 Rev P02
- Proposed East Elevation 0251 Rev P02
- Proposed South Elevation 0252 Rev P02
- Proposed West Elevation 0253 Rev P02
- Proposed Section 0260 Rev P02
- Proposed Section 0261 Rev P02
- Proposed Section 0262 Rev P02
- Proposed Section 0263 Rev P02
- Proposed 1st-7th Floor Plan AP01 Rev P02
- Proposed 8th Floor Plan AP08 Rev P02

- Proposed 9th-32 Floor Plan AP09 Rev P02
- Proposed 33rd Floor Plan AP33 Rev P02
- Proposed 34th35th Floor Plan AP34 Rev P02
- Proposed Roof Plan APRF Rev P02
- Proposed Ground Floor Plan AP00 Rev 03
- Proposed Basement Plan AP0B Rev P05
- Proposed Option Servicing Layby and Rear Car Park Access Layout Signalised Ramp Option Sheets 1-8 Plan No SK011 Rev E

APPENDIX 2: BRE 2022 Guidance

Daylight to existing buildings

The BRE Guidelines stipulate that the diffuse daylighting of the existing building may be adversely affected if either:

- the vertical sky component (VSC) measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value (or reduced by more than 20%), known as the “VSC test” or
- the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value known as the “NSL test” (no sky line).

Sunlight to existing buildings

The BRE Guidelines stipulate that the sunlight of an existing window may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours (APSH), or less than 5% of annual winter probable sunlight hours between 21 September and 21 March (WPSH); and
- receives less than 0.8 times its former sunlight hours (or a 20% reduction) during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

If one of the above tests is met, the dwelling is not considered to be adversely affected.

Daylight to new buildings

The vertical sky component (see above) may be used to calculate daylight into new buildings.

For daylight provision in buildings, BS EN 17037 provides two methodologies. One is based on target illuminances from daylight to be achieved over specified fractions of the reference plane for at least half of the daylight hours in a typical year. One of the methodologies that can be used to interrogate this data is Spatial Daylight Autonomy (sDA).

The Spatial Daylight Autonomy (sDA) seeks to establish how often each point of a room's task area sees illuminance levels at or above a specific threshold. BS EN 17037 sets out minimum illuminance levels (300lx) that should be exceeded over 50% of the space for more than half of the daylight hours in the year. The National Annex suggest targets comparable with the previous recommendations for Average Daylight Factor (ADF). The targets considered relevant for this application are:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

Paragraph C17 of the BRE states that *“Where a room has a shared use, the highest target should apply. For example in a bed sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities could use discretion here. For example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design”*.

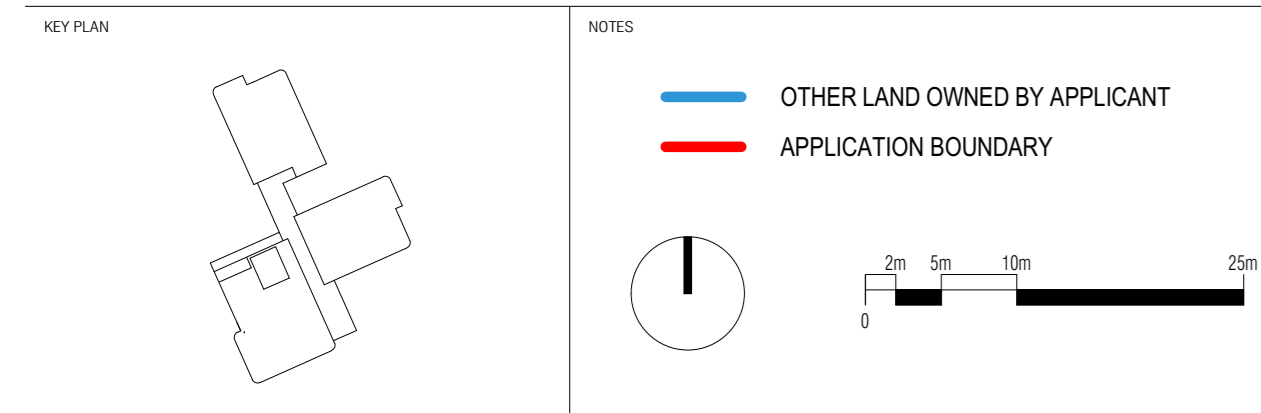
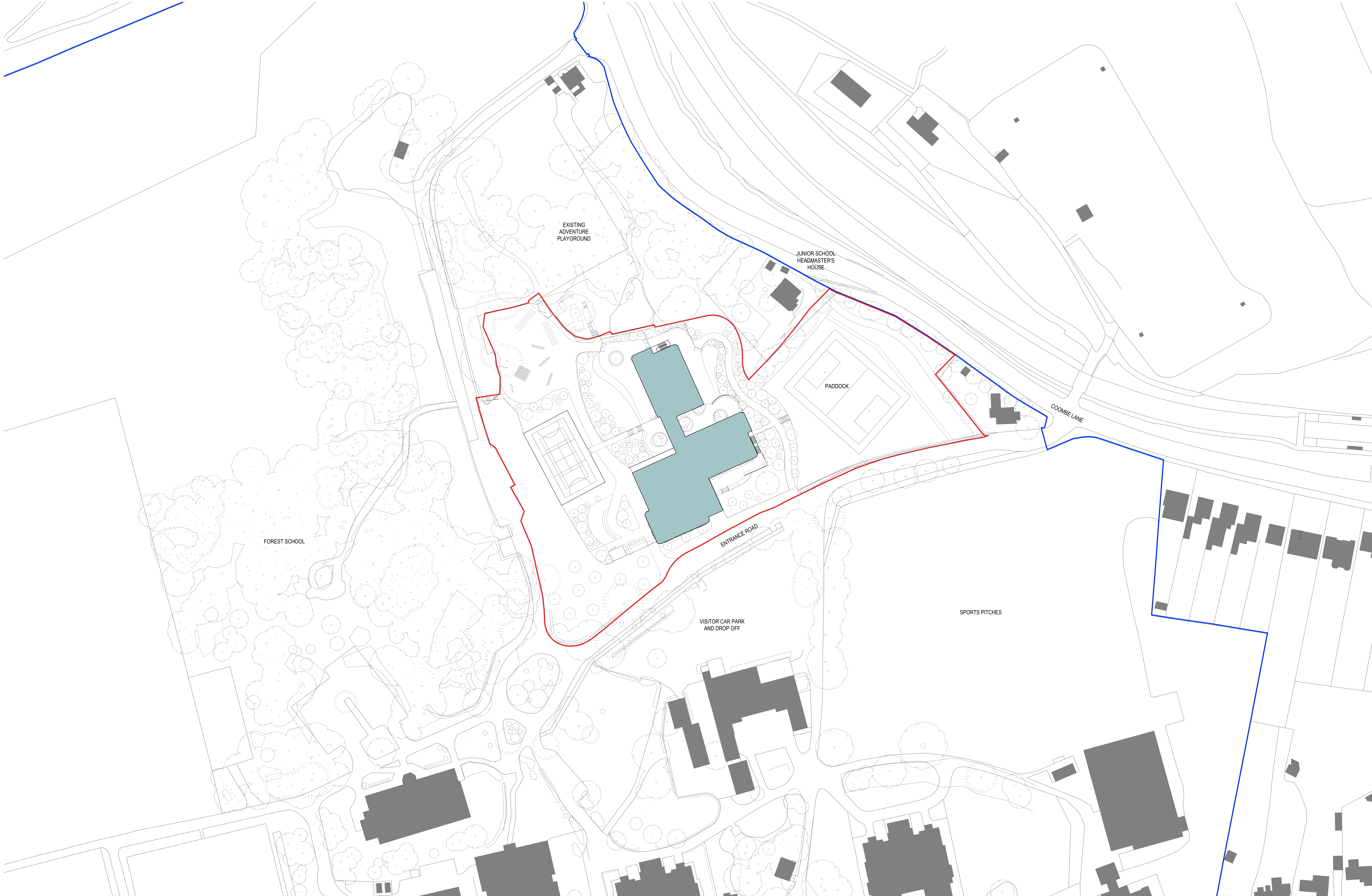
Sunlight to new buildings

The BRE guidelines state that in general, a dwelling or non-domestic building which has a particular requirement for sunlight, will appear reasonably sunlit provided that:

- At least one main window faces within 90 degrees of due south, and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Sunlight to gardens and outdoor spaces

The BRE guidelines look at the proportion of an amenity area that received at least 2 hours of sun on 21st March. For amenity to be considered well sunlight through the year, it stipulates that at least 50% of the space should enjoy these 2 hours of direct sunlight on 21st March.



NOTES

- OTHER LAND OWNED BY APPLICANT
- APPLICATION BOUNDARY

REV	DATE	DESCRIPTION	DRAWN	CHECKED
01	21.07.21	DEFT PLANNING SUBMISSION	AW	AW
02	02.08.21	PLANNING SUBMISSION	AW	AW
03	15.08.21	REVISED FOR PLANNING SUBMISSION	AW	AW
04	18.11.21	REV. SITE LOCATION UPDATED	AW	AW

DRAWING TITLE: PLANNING APPLICATION PROPOSED SITE PLAN
 CLIENT: ROYAL RUSSELL SCHOOL
 PROJECT: ROYAL RUSSELL JUNIOR SCHOOL
 ADDRESS: Sutton Yard 65 Goswell Road London EC1V 7EN

DRAWING NO: 3113-JWA-ZZ-ZZ-DR-A-0003 P04
 SCALE: S2
 SHEET: 10

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1 APPLICATION DETAILS

Ref: 23/03175/FUL
Location: Royal Russell School, Coombe Lane, Croydon, CR9 5BX
Ward: South Croydon
Description: Demolition of existing Junior School. Erection of replacement Junior School including Multi-Use Games Area, sports pitch, play and landscaped areas, access and plant, and other associated works.
Drawing Nos: For full list of drawings and submitted documents see Appendix B.
Applicant: Russell School Trust
Agent: Alexandra Martin, LUC
Case Officer: Samantha Dixon

1.1 This application is being reported to committee because:

- Objections above the threshold in the Committee Consideration Criteria have been received.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission

2.2 That the Director of Planning Sustainable Regeneration is delegated authority to issue the planning permission subject to:

A. Any direction by the London Mayor pursuant to the Mayor of London Order

B. The prior completion of a legal agreement to secure the following planning obligations:

- a) Employment and Training contribution
- b) Zero carbon offset of £21,710 and standard 'be seen' clauses
- c) Travel Plan and monitoring
- d) Retention of scheme architects
- e) Relevant monitoring fees (4 x £1,500)
- f) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

- 1) Commencement time limit of 3 years

- 2) Carried out in accordance with the approved drawings
- 3) Demolition of all existing junior school buildings
- 4) Limit the number of junior school pupils to 400

Pre-commencement

- 5) Submission of updated Construction Logistics Plan
- 6) Submission of Construction Environmental Management Plan for biodiversity
- 7) Submission of Biodiversity Gain Plan
- 8) 2 stage archaeology condition – Written scheme of investigation to be submitted
- 9) Contaminated land
- 10) Accordance with the Flood Risk Assessment and Drainage Strategy and further sustainable drainage details to be submitted

Prior to above ground floor slab level

- 11) Full details of materials to be submitted
- 12) Overheating mitigation details to be submitted
- 13) Hard and soft landscaping details (including boundary treatments) to be submitted
- 14) Submission of biodiversity enhancement strategy
- 15) Full details of photovoltaic panels to be submitted

Pre-occupation

- 16) Details of public art strategy to be submitted
- 17) Submission of wildlife sensitive lighting design scheme
- 18) Submission of community use agreement in consultation with Sport England
- 19) Multi Use Games Area and new grass football pitch to be provided
- 20) Details of cycle and scooter parking to be submitted
- 21) Secured by design measures to be approved and achieved
- 22) Whole Life-Cycle carbon assessment to be submitted
- 23) Circular economy - Post-construction monitoring report to be submitted

Compliance

- 24) Accordance with Tree Protection measures
- 25) Accordance with ecological appraisal recommendations
- 26) Accordance with Operational Waste Management Plan
- 27) Accordance with Delivery & Servicing Plan
- 28) Accordance with Energy and Sustainability Statement
- 29) Accordance with recommendations of the Air Quality Assessment
- 30) Air handling units/Plant/Machinery requirements
- 31) Requirement for ultra-low NOx boiler
- 32) Accordance with Planning Fire Statement
- 33) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

- 1) Subject to S106 agreement
- 2) Construction Logistics Plan informative related to Condition 5
- 3) Archaeological informative related to Condition 8
- 3) Sport England informative related to Condition 17
- 4) Construction Code of Practice
- 5) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

- 2.5 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.6 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.
- 2.7 That, if by 23rd February 2024 the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 The proposal is for the following:
- Partial demolition of some existing buildings on site to enable the construction of the new junior school and to accord as far as possible with Condition 8 of planning permission ref. 15/01323/P.
 - Erection of new junior school building comprising two to three storeys (GEA 3,973sqm)
 - Increase in number of classrooms from 19 to 20 (enabling a capacity of pupils from 380 – 400)
 - Installation of MUGA and outside play areas
 - Formalise use of paddock as a playing field
 - Provision of new vehicular access to 'Junior School Headmasters House' (from within the site)
 - No other alteration proposed to existing access or parking arrangement
 - Provision of refuse storage area, scooter and cycle parking bays
 - Installation of extensive soft landscaping and tree planting
 - Full demolition of existing junior school building on site once the new building is ready for occupation.



Figure 1: Proposed site plan

Amendments/Additional Information

- 3.2 During the course of the application additional information has been provided with regard to transport issues, in particular to address the comments that have been raised with regard to the access from Hollingsworth Road. Neighbours and ward councillors were reconsulted on the addition information.
- 3.3 Amended plans and additional information has also been received to address Stage 1 GLA comments. This information is with regard to; The Energy Strategy, Air Quality, flood risk assessment, urban greening calculation and transport issues. The issues raised are discussed in the report below. The plans have been amended to include the provision of 10 cycle bays within the junior school site.
- 3.4 The proposed waste management plan has also been updated and as a result the location of the bin store has been altered. Amended plans have been received to update the location of the bin store (on all relevant plans).

Site and Surroundings

- 3.5 The Royal Russell School site is spread over an area of 45 hectares and contains a large independent school (providing both secondary and primary education) comprising a series of individual buildings of one to three storeys in height, alongside large areas of parking, playing pitches and courts, staff accommodation and large areas of woodland. The school was established on the site in the 1920s. The school accommodates girls and boys from age 3 to 18 with both day and boarding pupils. The school provides education for approximately 1,150 pupils, and has 350 members of staff.

- 3.6 The development site itself is formed of the existing Junior School, the associated external play areas and the grass paddock area to the east, as outlined in red in Figure 2 (site location plan) below. The blue line shows the school's ownership boundary. The Junior School sits to the north of the main school campus and is the most visible part of the school from the entrance gates. The Junior school building was erected in the 1960s constructed of Laingspan, which is a prefabricated concrete construction held in place by tensioned steel cables. As well as the Junior School facilities, the buildings also comprise the nursery, medical wing and boarding accommodation. The boarding accommodation has been relocated into new build accommodation to the south and this element of the building is currently unoccupied. The buildings range in height from one to three storeys. There are outside play areas mainly to the rear and the complex is surrounded by woodland. The Junior School currently has capacity for 380 pupils aged 3-11 (nursery to Year 6), in 19 classrooms.
- 3.7 Access to the school campus is mainly from the Coombe Lane (A212) entrance point. There is also a pedestrian access from Hollingsworth Road to the south which is a residential cul-de-sac. A historic access from Coombe Lane is located to the western side of the junior school site, however is no longer in use. The existing car parking areas are located to the front/south and west/side of the junior school site and these areas serve the whole campus.
- 3.8 The surrounding area is predominantly residential. The tramline runs past the site to the opposite side of Coombe Lane to the north east. The north eastern part of the site slopes gently downwards towards Coombe Lane. However, due to the topography and presence of mature trees, views into the site are limited.



Figure 2: Site location plan



Figure 3: Aerial view of the Royal Russell School campus



Figure 4: Aerial view of the Junior School



Figure 5: Existing Junior School building when viewed from vehicular access into the site

Planning Designations and Constraints

3.9 The site is subject to the following formal planning constraints and designations:

- The site is located within the designated Metropolitan Green Belt
- Much of the site is within a Site of Nature Conservation Importance (the junior school site itself is not within this designation however the land surrounding the site is)
- The site is wholly within the Addington Hills Archaeological Priority Zone
- The entire school site is a locally listed Historic Park and Garden
- The Main Lodge of the school (to the north of the junior school site) and the part of the main school building (within the main school complex to the south west of the junior school site) are on the Council's Local List of buildings of Architectural or Historic Value.
- Old Ballards Cottage to the far south of the school campus is a Grade II statutorily listed building.
- A small part of the site to the north-west adjoining Coombe Wood lies on the edge of a designated Croydon Panorama (viewed from Addington Hills).
- Some trees within the site are protected by Tree Preservation Orders (TPO). There are two TPO's that affect the site TPO No.27, 1970 and No.27, 2014. Neither of these are located in close proximity to the junior school site.
- The site (at its entrance point on Coombe Lane) has a Public Transport Accessibility Level (PTAL) of 2, Coombe Lane tram stop is approximately 160m from the school entrance (3 minute walk). This tram line runs to New Addington and Wimbledon (via Croydon).
- The site is largely at low risk of surface water flooding, however there are areas around the junior school (including the area where the new building is proposed) that are at 1 in 1000 year risk. The site has limited potential for ground water flooding to occur.

Planning History

3.10 There is extensive planning history at the site. The following most recent planning decisions are:

07/03765/P Erection of two/three storey link extension to provide performing arts centre; enhanced kitchen and dining facilities and ancillary office accommodation.

Approved [and implemented]

11/03345/P Erection of single storey detached building for use by gymnastics club. **Refused** on grounds of impact on greenbelt and unsatisfactory design and layout.

13/01357/P Two all-weather pitches; multi use games area; floodlights; new grass playing pitches; improvements of internal access road.

Approved [and implemented]

14/03633/DT Proposed boarding houses and pavilion, to be the first applications within merging master plan proposals for boarding houses, academic and sports facilities, car parking and landscaping.

Environmental Impact Assessment Not Required

15/01323/P Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation.

Approved 30.07.2015 [and implemented]

Within the assessment of this application it was concluded that the development was inappropriate in the Green Belt however very special circumstances existed to outweigh the harm. To mitigate the harm the applicant committed to demolition of other buildings within the site to offset the development, the Officer report commented as follows:

'Following the completion and occupation of Building 1, the existing Cambridge House boarding accommodation would be demolished, releasing 633m² of Green Belt land. Following the completion and occupation of Building 2, the existing Queens House boarding accommodation would be demolished, releasing a further 950m² of land. This is a significant mitigating factor to be weighed against the harm to the Green Belt in this case. The applicant has confirmed that they would be prepared to commit to the demolition of the existing buildings in this sequence and the detailed wording of a planning condition (Planning Condition 8) is recommended to reflect this approach.'

Subsequently, Condition 8 of 15/01323/P reads as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 6 months after the first occupation of Building 1 shown on plan ref. 2715 A499. The demolition of Queens

House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.

Reason: To preserve the openness and visual amenity of the Green Belt in accordance with Policies RO1 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.16 of the London Plan (Consolidated with alterations since 2011) and Chapter 9 of the National Planning Policy Framework (NPPF)'.

16/04999/CONR Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation (without compliance with condition 7 -sustainability- and 17- built in accordance with plans- attached to planning permission 15/1323/P).
Approved 07.02.2017 [and implemented]

17/00682/CONR Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation (without compliance with condition 8 - time period for demolition of Cambridge House- attached to planning permission 15/01323/P).
Approved 14.07.2017

Wording of Condition 8 amended to read as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 1 year after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.

Reason: To preserve the openness and visual amenity of the Green Belt in accordance with Policies RO1 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.16 of the London Plan (Consolidated with alterations since 2011) and Chapter 9 of the National Planning Policy Framework (NPPF)'.

18/02909/FUL Science block extension
Approved 11.09.2018 [and implemented]

20/02463/CONR Variation of condition 8 (time for demolition in respect of Queens House extended to 12 months) subject to previous planning consent ref. 19/02112/CONR.
Approved 30.10.2020

In considering the application, the Officer report commented as follows:

'It is not considered appropriate or necessary to extend the time allowed for demolition by 2.5 years. The main consideration is the impact of the variation to the condition on the openness and visual amenity of the Metropolitan Green Belt. The impact of the change would mean Queens House would be retained on the site for an additional 2.5 years (maximum) than was originally required by the condition. One of the main justifications for allowing the original redevelopment of the school in the Green Belt was the ability to control the phasing of development to ensure that works continue and Green Belt land is released as planned to minimise the long term impact on openness. It is considered that three years is an excessive length of time to extend the demolition requirement by, and would effectively mean works would cease for a significant length of time with the existing situation (and harm to the Green Belt) becoming established on site. The varied wording of the condition originally proposed by the applicant therefore cannot be supported.

On balance it is considered an extension of time of a further 6 months (total of 1 year) to the demolition of Queens House can be accepted, to allow the applicant some flexibility given the arguments they have raised but ensuring the phased works continue to minimise the impact on the Green Belt. It is not considered appropriate or necessary to extend the other timescales secured by the condition, for example it is not considered unreasonable for demolition to be completed within 6 months of its commencement to allow development to move forward.

Subsequently the wording of Condition 8 was amended as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 1 year after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 1 year after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.

Reason: To preserve the openness and visual amenity of the Green Belt'

22/02544/CONR Variation of Condition 8 (time for demolition in respect of Queens House) attached to planning permission ref. 15/01323/P (as amended by 19/02112/CONR and 20/02463/CONR) (Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation)

Approved 30.03.2023

By reason of the ongoing extensive pre-application discussions with regard to the replacement of the junior school building, the wording Condition 8 was amended as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 1 year after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched

in red on plan ref. 2715 A499, shall be commenced no later than 2 years 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 2 years following their commencement.

Reason: To preserve the openness and visual amenity of the Green Belt'.

22/01580/PRE Demolition of the existing Junior School and replacement on the same site with a new Junior School, associated outdoor areas and landscaping.

This pre-application enquiry was presented to Planning Committee on 18th May 2023. See summary of members comments in Section 5 below.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

4.1 The application is recommended for approval for the following reasons:

- Very special circumstances have been demonstrated to enable officers to conclude that the development would not have any adverse impact on the openness of the Metropolitan Green Belt.
- The proposed development would be acceptable in terms of its layout and design.
- There would be no adverse impact on existing sports facilities.
- The loss of 3 trees on site would be well mitigated by the extensive tree and landscape planting that is proposed.
- The scheme would achieve biodiversity new gain which well exceeds the policy requirement.
- The proposal has been designed to meet the functional needs of the school, providing high quality inside and outside learning facilities.
- There would be no adverse impact on any neighbouring residential property in terms of loss of light, privacy, outlook or noise disturbance.
- Existing access and parking provision will not be affected by the proposed works. There will not be any significant additional impact on the surrounding highway network.
- The existing access/highways issue that has been raised relating to Hollingsworth Road is an existing situation which will not be significantly additionally impacted by the proposal. The school has outlined measures to address this issue as far as is reasonable.
- Sustainable travel improvements will be facilitated through the School Travel Plan.
- The development will meet energy performance targets.
- The proposal will cause no air or noise quality concerns.
- Sustainable drainage systems are proposed that meet with Lead Local Flood Authority requirements.

4.2 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

5.2 The following were consulted regarding the application:

Greater London Authority (GLA) (Statutory Consultee)

5.3 GLA Stage 1 comments as follows:

- Land use principles: The redevelopment of this previously developed site does not cause greater harm to the openness of the Green Belt and thus meets exception to inappropriate development. The re-provision of improved facilities for education is supported in principle.
- Urban design: The design of the proposed development raises no strategic concern.
- Transport: General parking should be decreased and blue badge parking provision should be increased in line with London Plan Policy T6. Long-stay and short/stay cycle provision should be increased. (Officer Comment: The applicant has submitted additional information in response to the concern raised. This is discussed further in paragraph(s) 8.134 and 8.147 of this report).
- Other issues on Energy, Whole Life carbon and Circular Economy also require resolution prior to the Mayor's decision making stage. (Officer Comment: The applicant has submitted additional information in relation to the matters raised. This is discussed further in paragraphs 8.159, 8.161, 8.164-8.173 and 8.187 of this report).
- The application does not yet comply with the London Plan. Possible remedies as the GLA has set out could address these deficiencies.

Lead Local Flood Authority (LLFA) (Statutory Consultee)

5.4 There was an initial request for further information from the LLFA. Updated information has been provided and the LLFA have confirmed that they have no objection as the application now meets most of the LLFA requirements. Some clarifications and additional information are still required to demonstrate that the proposals are fully compliant. However, these can be addressed by the inclusion of a pre-commencement condition to provide such details.

Sport England (Statutory Consultee)

5.5 No objection as the development is considered to broadly meet exception 5 of Sport England Planning Fields Policy and to accord with Paragraph 99 of the NPPF, subject to conditions securing the delivery of the proposed outdoor sports areas and a community use agreement relating to the MUGA.

The Gardens Trust (Statutory Consultee)

5.6 London Historic Parks and Gardens Trust has considered the information and on the basis of this there are no comments on these proposals.

Historic England Greater London Archaeological Advisory Service

5.7 The 1.7ha application site is located within a Tier II Archaeological Priority Area. There is a discernible archaeological potential. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition could provide an acceptable safeguard.

Thames Water

- 5.8 If the developer follows the sequential approach to the disposal of surface water, Thames Water would have no objection. Thames water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. No objection with regard to waste water network and sewage treatment works infrastructure capacity. (Officer comment: The site is not in an area at high risk of flooding. The developer has followed the drainage hierarchy).

Ecological Consultant

- 5.9 No objection subject to the imposition of conditions

Metropolitan Police Service

- 5.10 Request the standard Secured-by-Design condition to be imposed. The condition will make sure that the school is developed into a safe and secure environment for the children and staff.

Building Control

- 5.11 No objection raised. The competency of the authors would appear to meet that expected by the guidance. (Officer note: The London plan requires independent fire strategies to be produced by a third party, suitably qualified assessor. Guidance is contained in London Plan Guidance on Fire Safety, dated February 2022). The statements anticipated in respect to the proposal meeting the policy objectives appear to have been made.

6 LOCAL REPRESENTATION

- 6.1 A total of 81 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 19 Objecting: 18 Neutral: 1

- 6.2 Croham Valley Residents Association have objected to the application for the following reasons:

- At the Pre Application stage the Planning Dept and the Planning Committee were misled as regards the access routes to the School by omitting to make any mention of the very busy school gate on to Hollingsworth Road.
- The full planning application continues to make not mention of the very busy school gate on to Hollingsworth Road. (Officer comment: The gate on to Hollingsworth Road, whilst in the ownership of the applicant is outside of the application site (red line boundary on site plan), which relates solely to the Junior School).
- The issue with the very busy school gate on to Hollingsworth Road is that the School's practice of allowing parents and pupils to access the School via a back gate adjacent 34 Hollingsworth Road has caused an ever increasing number of parents to charge up Hollingsworth Road in their cars to compete for position nearest that gate at school arrival and departure times. They not only joust for

position in the road with residents, but also with refuse trucks and delivery vehicles. The road is regularly "gridlocked". The School has said that this gate access is "pedestrian only", apparently preferring to turn a blind eye to the daily traffic chaos that results from it in Hollingsworth Road at 8am and 4pm. The practice has become very dangerous - not only for school children, but also for residents. Hollingsworth Road was never designed to take 50 cars (or more) twice a day in this way and, as the school expands, the situation is set to get worse. A much higher percentage of private school pupils arrive at school by private cars. This has become a nightmare for residents with car parking across their drives.

- One cannot underestimate the danger, only recently a pupil ran out of the gate into the side of moving car and not mention the number cars that have been hit in the location due to the congestion.
- The school needs totally close off the use of this gate.
- If not Hollingsworth Road needs to have some form of very restrictive controlled access implemented that prevents parents dropping their children off in this cul de sac.

6.3 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection	Officer comment
Transport and Highways impacts	
Use of Hollingsworth Road for school drop off and pick ups causing traffic congestion and danger with total disregard of local residents	Addressed below in Paragraphs 8.135 – 8.142
The Transport Statement does not mention the access onto Hollingsworth Road or provide any transport data	
Further expansion of the school without addressing the use of the Hollingsworth Road access is a danger to school users and residents	
Concern over construction workers using Hollingsworth Road for parking and access to the site	
A condition should be imposed to prevent the use of the rear gate	
The second existing access on Coombe Lane should be reinstated	

6.6 DESIGN REVIEW PANEL FEEDBACK

The scheme was presented to the Council's Design Review Panel (DRP) on 4th May 2023. The Panel's comments are summarised as follows:

Massing

- The Panel considered that the massing and way the building sits with the site is positive.

- The Panel liked the way the building has been broken into three parts.
- They considered that the two rear blocks work well, however the frontage block is not so successful. The curve and the blank corner don't work. The building should be more outward facing. The elevations should be brought more in harmony with one another.

Architectural Expression

- The Panel questioned the relationship of the proposed building to the rest of the school site. How did it speak to the adjacent buildings? The connection was not balanced right.
- The building doesn't need to be so 'hidden'.
- The Panel requested to see more boldness in the material palette. The original buildings on site are not shy and this should be celebrated.
- The Panel liked the use of timber and felt that there could be more timber within the material palette.
- The Panel like the concept of the spine however felt that its appearance has been watered down too much in the latest iterations.
- The entrance is key and needs to be more dominant.
- Public art at the entrance is encouraged.

Landscape and Amenity

- The Panel like the access approach.
- The landscape approach responds well to the setting.
- The Panel noted that the teaching environment will be amazing thanks to the landscaping opportunities e.g. rain gardens, network of routes, planting.
- The Panel suggested the applicant think more flexibly about the MUGA and what it could be e.g. outdoor performance area, rain water attenuation area.
- Outdoor covered spaces for teaching will be really valuable.
- Connectively to the rest of the site should be better achieved by use of landscaping. The applicant should look beyond the red line e.g. planting within car park, connection to the forest school.
- If trees are removed, they should be reused on site e.g. for biodiversity, for education.
- The scheme should promote the use of extensive green roofs alongside the PV panels.

Summary

- The Panel were supportive of the siting and massing of the building.
- The Panel felt that the architectural expression is lacking and should better connect with the more historic buildings at the Senior School site.
- The landscaping creates a fantastic opportunity to provide a fantastic teaching facility.

6.7 PLANNING COMMITTEE FEEDBACK

The pre-application proposal was presented to Planning Committee on 18th May 2023. The main issues raised by members at this meeting were as follows:

Principle of the Scale of the Development along the green belt

- There was a belief that the proposal was special circumstance to build along the green belt as the school was an important education establishment in the area and the development would improve the facilities of the school and there would be more children educated locally.
- The local plan stated that the investment in school expansion should be supported.
- The viability of the school could be threatened if the expansion to the junior school was denied.
- There were concerns about a potential issue with traffic management given the proximity of the tram stop to the school entrance.
- Members felt as though the proposed development would provide a significant increase in the building's dimensions.
- There was a belief that the developers should look to mitigate the environmental impact of the construction work carried out on the site.
- The proposed development should add to the green belt and the plan to increase the biodiversity in the area was encouraged.
- Members acknowledged that the school would open their grounds to the wider public once the development had been completed and asked for clarification on the activities that the school intended to host on their site.

Location, development and massing

- Members were pleased with the massing of the proposed development, and they approved of the additional trees that would be introduced near the entrance of the site.

Design, appearance and materiality of the building

- Members stated that they would prefer a more traditional design of red brick for school buildings.
- Members proposed the recycling of rainwater and asked the developers to make better use of their flat roof space.
- Members felt as though it was important to reflect the design of the main school building in the junior school design.
- However, it was also noted that trying to mimic the design of another building would be tough to execute and having the building be a complimentary colour to the main school building would be a clever alternative.
- There was some concern over the wood within the design of the building, the use of wood for the connection between the buildings was appreciated however the contrast between the wood and the colour of the building would not be as complimentary in future as the colour of the wood may change slightly.
- Members expressed concern at the lack of window space in the proposed development.

Landscape and Ecological Gain

- There was a suggestion that the developer could introduce green walls which would allow the building to blend into the green belt, however this sentiment was not shared by all of the Members.
- Members suggested that the developers could implement a cluster of trees to give a mini forest appearance on the site.

- Members proposed that there be facilities for children to learn how to plant and harvest produce.
- Members felt as though there should be consideration to sensory approaches to the design to provide the children with different textures, colours, smells etc.
- There was the belief that more people would be able to enjoy the green belt as the proposed development would allow more children to attend the school.
- Members asked whether the developers could do more planting in the surrounding area of the site.

Other Matters

- Members asked when the application was presented to the committee, would the applicant be able to evidence that because of the proposed development the school would be able to do more to help the more disadvantaged members of the community.
- Members queried whether developers would use local builders and whether the building supplies would be sourced locally.
- Members believed that there would be a high percentage of parents who would drive their children to the school and the increase in capacity of the school would result in more cars in the surrounding area.
- Members enquired whether the developer could introduce a more direct access path to the school.
- Members believed that the developers should explore the implementation of a travel plan.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- GG1 Building Strong and Inclusive Communities
- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D8 Public Realm
- D12 Fire Safety
- D14 Noise
- S1 Developing London's Social Infrastructure
- S3 Education and Childcare Facilities
- S5 Sports and Recreation Facilities
- HC1 Heritage Conservation and Growth
- G1 Green Infrastructure
- G2 London's Green Belt
- G5 Urban Greening
- G6 Biodiversity and access to nature

- G7 Trees and Woodlands
- SI 1 Improving Air Quality
- SI 2 Minimising Greenhouse Gas Emissions
- SI 3 Energy Infrastructure
- SI 7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, Servicing and Construction
- DF1 Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM14 Public Art
- DM16 Promoting Healthy Communities
- DM17 Views and Landmarks
- DM18 Heritage Assets and Conservation
- DM19 Providing and Protecting Community Facilities
- DM23 Development and Construction
- DM24 Land Contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM26 Metropolitan Green Belt
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in new development
- DM46 South Croydon

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated in September 2023, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF

identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Achieving Sustainable Development
- Promoting Healthy and Safe Communities
- Promoting Sustainable Transport
- Making Effective Use of Land
- Achieving Well-Designed Places
- Protecting Green Belt Land
- Meeting the Challenge of Climate Change and Flooding
- Conserving and Enhancing the Natural Environment
- Conserving and Enhancing the Historic Environment

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- National Design Guide (2021)

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development in the Metropolitan Green Belt
2. Design, Townscape and Heritage
3. Impact on sports pitches
4. Trees, landscaping and biodiversity
5. Quality of accommodation provided
6. Impact on adjoining occupiers living conditions
7. Highway impacts
8. Environmental Impacts – Building performance, contaminated land, flood risk, air quality, noise,
9. Other Planning Issues
10. Conclusions

Principle of development in the Metropolitan Green Belt

Policy Context

8.2 Section 13 of the NPPF (2023) refers to the protection of Green Belt land. Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 says that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

8.3 Paragraph 149 outlines that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development.

8.4 Policy G2 of the London Plan (2021) refers to London’s Green Belt and says that the Green Belt should be protected from inappropriate development: 1) Development proposals that would harm the Green Belt should be refused except where very special circumstances exist, 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

8.5 Croydon Local Plan (2018) Policy DM26 refers to the Metropolitan Green Belt. The Council will protect and safeguard the extent of the borough’s Metropolitan Green Belt by applying the same level of protection as national planning policy. In considering whether extensions to existing buildings are disproportionate or if any proposed structure harms the openness of Metropolitan Green Belt the Council will have regard to:

- a. Changes in the floor space and volume of buildings;
- b. The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;
- c. Use of basements and roof spaces as living areas;
- d. Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;
- e. The size of the curtilage and character of the surrounding area; and
- f. Whether ancillary structures have an urbanising effect.

Whether the proposals constitute inappropriate development

8.6 As noted above, Paragraph 149 of the NPPF outlines exceptions within the Green Belt that could be considered as appropriate. This includes the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

8.7 Officers do not consider that the proposal constitutes development that is captured by any of the relevant exceptions and this is because, as a result of the site planning history, the proposal would introduce development in the Green Belt that would be significantly greater in floor space and volume than the existing structures and is therefore inappropriate development.

Relevant Planning History

8.8 Planning permission was granted in 2015 (reference 15/01323/P) for the construction of two three-storey buildings to provide replacement residential student

- 8.10 The consequences of this previous permission, and required demolition, are that the resultant volume of building that is retained as the existing junior school is considerably less than existing.
- 8.11 Now as proposed, the increased mass, when taking into account the volume of the new building, plus that of the boarding houses approved under 15/01323/P (as the volume to be demolished by condition is made negligible as a result of the proposed new mass), would have a greater impact on the openness of the Green Belt than that of the existing development (as granted by the restrictions of the planning permission). Therefore, the proposal would introduce development in the Green Belt that would be significantly greater in floor space and volume than the existing structures and is therefore inappropriate development.

Footprint analysis

Existing gross external footprint = 3,443sqm
Amount left after removal of floor space by Condition 8 of 15/01323/P = 1,698sqm
Proposed gross external footprint = 2,072sqm
= Increase in footprint = **+327sqm**

Floor area analysis

Total gross external floor area of existing school = 5,735sqm
Amount to be demolished by Condition 8 = 3,231sqm
Remaining space = 2,504sqm
Proposed external floor area of new school = 3,973sqm
= Increase in floor area of = **+1,469sqm**

The scheme proposes 20 classrooms (which is 1 more than the current school).

- 8.12 The applicant has made the argument that, for the following reasons, the proposed school would not have a greater impact on the openness of the Green Belt than the existing development:
- Regardless of exact timings of when buildings are demolished and why, at the end of the process this area of previously developed Green Belt land will be more open than it is currently.
 - The proposed school will have a more compact form than the existing Junior School, making best use of land, and improving the physical openness of this part of the Green Belt. The current school contains areas of enclosed courtyard space which, while not contributing to the built footprint, also do not contribute to the visual openness of the site as they cannot be seen other than from above. The result is that visually, the existing school appears to use much more of the site. The proposed Junior School is located solely on the eastern part of the site and does not include enclosed courtyards or other hidden open spaces. Instead the entire central and western portion of the site will be kept open and used for outdoor play and landscaping. Therefore, the site will be much more open overall.
 - With the demolition required by Condition 8 being taken into consideration, the actual 'built area' of the site (the footprint) will only be increased by 327sqm.

- The form of the building makes best use of the natural slope, seeking to ground the building in the topography, siting it down into the natural northward sloping site and presenting a single storey to the east and views from the entrance to the school grounds.
- The massing has been broken up into three distinct building forms allowing the building to sit more comfortably in the Green Belt context. A connecting bridge is proposed which allows for views through the proposed school and allows the landscaping to flow through and around the building.
- The materials of the building will be more complementary to the surrounding Green Belt setting, reducing visual impact. Materials will both complement the character of the existing buildings on campus which are constructed predominantly of brick and stone, but also ground the building in the woodland setting with elements of timber and warmer tones. The existing buildings are of unattractive 1960s construction which is considered to detract from the Green Belt woodland and parkland setting of the school. The current areas of hardstanding contrast with the surrounding landscape. The proposed Junior School includes external areas designed to work in harmony with the existing woodland Green Belt setting.
- There will be additional planting along the eastern boundary of the proposed Junior School which will soften views of the building from both within the site and the entrance to the school.
- Existing and proposed views of the Junior School are included in the submitted design document (see images further below in this report) and illustrate the positive impact the new school will have on the setting of this area of the campus. The proposals sit much more comfortably within the topography and thus appear lower than the existing school from the main entrance. The surrounding woodland will be visible above and provide a backdrop to the proposed building. The materials also work to soften the visual impact. Furthermore, the proposals will include a significant amount of planting that will help to soften the view of the new building from this road. From other areas of the campus, in particular the western side, the new building is less visible as it is contained within the eastern portion of the site, with the western half dedicated to outdoor play and landscaped areas. It is noted that the land beyond the main the School campus is very well wooded so views of the new building from outside the campus are restricted to limited views at the entrance off Coombe Lane.
- The applicant has provided floor plans of the existing junior school provision which evidences that the proposal is replacing (and improving) facilities that the school already has.
- The increase in floor space in comparison to the existing junior school provision is as a result of the one additional classroom and the thickness of the external walls which is required to provide a high level of thermal insulation (to meet current day requirements).
- The applicant has explored all possibilities to undertake other demolition on the school campus, however all of the remaining buildings are in constant use and are all essential to the schools function.

- Alternative locations for the building have been considered however the proposed site is most appropriate because; the whole campus is in the Green Belt; the proposal is on the site of the existing junior school and therefore previously developed land; other options would involve use of greenfield land, affecting playing fields and pitches.

8.13 Whilst the positive design and landscaping moves listed above are noted by the local planning authority, and will be discussed in the sections below, impact on the openness of the Green Belt needs to be measured in terms of building mass (floorspace and volume) not just footprint and with regard to the site history. As such, officers maintain that the development amounts to inappropriate development in the Metropolitan Green Belt, and as such should not be approved except in very special circumstances.

The Very Special Circumstances

8.14 Paragraph 147 of the NPPF states that: *“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”* Paragraph 148 states that: *“Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*

8.15 The applicant has identified a number of ‘very special circumstances’ which they consider would cumulatively outweigh the harm to the Green Belt by reason of inappropriateness and to justify the development:

8.16 Planning policy support - There is planning policy support for providing adequate school facilities. Paragraph 95 of the NPPF states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities and that great weight should be given to the need to create, expand or alter schools. Policy S3 of the London Plan states that development proposals should ensure that there is no net loss of education or childcare facilities. Boroughs should ensure the location and provision of a range of childcare services in different types of settings to meet the needs of local communities. Croydon Local Plan Policy SP5 says that the Council will support investment in the improvement and expansion of primary and secondary schools and special schools to meet the needs of the community and its growing population. Pre-school facilities will be provided, enhanced and updated in alignment with the growing population. Paragraph 7.15 says that the quality of educational facilities needs continual renewal and improvement to meet modern standards. Additionally, the educational estate needs to be expanded to meet the requirements arising from housing and demographic growth and to fulfil the objectives of Croydon’s Sustainable Community Strategy. This will require both the expansion of existing schools and the provision of new schools.

8.17 There is clear national and local policy support the provision and improvement of schools and their facilities, which should be given considerable weight in planning decisions.

8.18 Quality of existing buildings - The new Junior School is proposed out of necessity rather than desire. The existing Junior School is one of a collection of buildings at Royal Russell School that were built in the 1960s of ‘Laingspan’ construction, a method which has a limited structural lifespan. The Laingspan buildings are of prefabricated concrete construction held in place by tensioned steel cables. However, these steel elements are vulnerable to rust and consequently Laingspan buildings have a limited life. A number of these buildings, such as Cambridge Boarding House, have already been

demolished and replaced. Those that remain, including the Junior School, now require more regular engineering checks and urgently need to be replaced. A recent structural survey noted that there is little time left for the current Junior School buildings.

- 8.19 Regardless of the Laingspan issues, the existing Junior School is now aging. The existing spaces are no longer fit for purpose and do not meet the requirements and standards of the school for teaching and learning. The new Junior School will be of a much higher quality with spaces specifically designed both for the school's needs and to accord with modern day teaching standards.
- 8.20 The existing Junior School has a capacity for 380 pupils (based on the provision of 19 classrooms each able to accommodate 20 pupils). However actual pupil numbers are lower than this as the school does not have sufficient supporting spaces in terms of quantity and quality e.g. insufficient space for gatherings, dining space, specialist teaching space. The proposed building is significantly more efficient than the current building. The proposed building will have benefits for pupil learning, comfort and wellbeing.
- 8.21 Building Bulletin 103 (a Department for Education guidance document that aims to assist those involved in creating design briefs for new schools) has been used in parallel with an analysis of the curriculum being offered by Royal Russell to determine and develop the areas required for the various spaces within the proposed school. The range and number of specialist teaching spaces in the proposed new Junior School is equivalent to the current provision, to meet the needs of the school's successful curriculum.
- 8.22 The existing Junior School is inefficient in terms of its circulation space and built fabric, resulting in high energy use. The proposed school is much more efficiently planned than the existing school, which will have significant operational and sustainability benefits (see further detail below).
- 8.23 Implications of Condition 8 demolition – As outlined above, some of the spaces that are required to be demolished by Condition 8 of planning permission 15/01323/P are integral to the functioning of the Junior School (e.g. plant space, gym, classrooms). Therefore this demolition cannot commence and allow the existing Junior School to operate.
- 8.24 The calculation to determine the area of the Junior School to be demolished in order to balance out the area of built development in the Green Belt was based purely on footprint at the time of determining application 15/01323/P. It is noted that the footprint of the proposed Junior School exceeds the footprint of the existing Junior School (which is left once the required demolition has taken place), by 327 sqm, which the applicant considers could be viewed as not being materially larger than the existing building.
- 8.25 When all of the floorspace to be demolished by Condition 8 is removed from the existing school floor space, there is not adequate space left to provide a replacement Junior School which is fit for purpose. Building within the parameters of the remaining floor space would not enable the school to reprovide current provision, nor improve necessary assembly or dining/support spaces to current standards and guidance.
- 8.26 Demonstration of educational need

- 8.27 There are no sites in this part of the borough that are allocated for educational use in the local plan. All sites allocated for education use within the current Local Plan have either been developed or granted planning permission.
- 8.28 The Royal Russell School campus lies entirely within the Green Belt. The school does not own any land outside of the existing Green Belt campus. The applicant ascertains that the replacement Junior School is required to be located on the Royal Russell School campus. The campus operates a central service function for operational matters and use shared facilities such as catering, sports and boarding. The 'through school' provision is an intrinsic part of the Royal Russell business model, and is important to pupils and parents. Feedback (as evidenced in the 2022 parent satisfaction survey) shows that parents hold the 'through provision' near the top of their agenda when considering Royal Russell Junior School. Furthermore, year 5 and 6 are always at capacity as parents see this as an entry point to the senior school at year 7. More than 94% of year 6 pupils will progress on to the Senior School and similar rate stay onto Year 11. At least 60% of reception pupils progress through to Year 7.
- 8.29 The loss of the Junior School from the site would cause irreparable damage to the school from an education perspective, and as a business, with the need for up to 380 pupils to find alternative school places, and 50+ staff to find alternative employment, and a loss of income in excess of £5m per annum.
- 8.30 Royal Russell School is an extremely popular option for parents in the area seeking an independent education for their children. There is clear demand, and therefore an educational need, for the replacement Junior School to be provided. This is evidenced by:
- The current pupil roll and high demand.
 - Royal Russell School receives 7 applications for every place.
 - Current un-met demand due to insufficient facilities (capacity is 380).
 - The nursery is over-subscribed.
- 8.31 Primary school provision and capacity within LB Croydon – In LB Croydon's 2023 Education Estates Strategy Report (2022 – 2025), the council noted that there were more places than pupils at both primary and secondary levels, but the balance between the two varied across the borough, within educational planning areas and particularly school-by school: shortages of places at popular schools can exist alongside surplus places at others. While demand for state primary school places has reduced in LB Croydon as a whole, due to falling birth rates and changes in immigration, this has mainly been experienced in the north west and east of the borough. Over the next three years, the expected growth in pupil numbers varies widely: in some places, particularly in the central and south of the borough, demand for school places is expected to increase due to pupil yield from planned housing developments. For example, there has been a higher than expected increase in demand for school places in the south-west due to pupil yield from the Cane Hill housing development in Coulsdon, as well as in the centre of the borough. In summary, while there are currently sufficient primary school places in LB Croydon, there is a shortfall of places at popular schools, and additional need is linked to new housing development in central and southern parts of the borough. Royal Russell School lies within the South East primary school planning area of the borough.
- 8.32 The applicant has provided data for each of the nine closest state primary schools to Royal Russell, including their 2022 admissions number, the number of applications

received for 2022 and the furthest straight line distance for 2022 intake. It can be seen that each was oversubscribed, most by a significant amount, and that generally, the furthest distance for intake is very small (less than a mile for six of the nine schools listed). This suggests that primary school pupils in the area may not have received their first choice school place.

Primary School (and straight line distance from Royal Russell)	2022 admissions number	Applications received for 2022	Furthest straight line distance for 2022 intake
Park Hill Infants (1.3 miles from Royal Russell)	90	325	0.374
St Johns C of E Primary School (1.05 miles from Royal Russell)	60	206	N/A
Harris Primary Academy Benson (1.28 miles from Royal Russell)	30	109	0.717
Courtwood Primary School (1.56 miles from Royal Russell)	30	119	0.363
Forestdale Primary School (1.3 miles from Royal Russell)	60	183	0.438
Gilbert Scott Primary School (0.92 miles from Royal Russell)	30	44	4.187
Selsdon Primary and Nursery (0.93 miles from Royal Russell)	90	102	2.266
Ridgeway Primary School (1.29 miles from Royal Russell)	90	317	0.649
St Peters Primary School (1.06 miles from Royal Russell)	60	220	0.683

Table 1: Primary school admissions and demand

8.33 Another good indicator of local demand for state school places is Coombe Wood School, located in close proximity to Royal Russell School. When it opened in 2018, Coombe Wood School received 530 applications for 180 places. While this is a secondary school, the school notes that this level of applications demonstrates the strength of demographic demand in the area. Coombe Wood School also provides a precedent of education development on a Green Belt site (although the site was removed from the Green Belt in the local plan) for the provision of school places in the local area.

8.34 The applicant contends that, whether or not there is an overall surplus in the state sector, it remains the case that there is an existing Junior School at Royal Russell, an essential need to replace the current building for current pupils, and a clear demand for places. National and local planning policy strongly supports a choice in education provision (as set out in NPPF paragraph 95, and Croydon Local Plan Policy SP5.9 and SP5.11), and Royal Russell makes an important contribution to this.

8.35 Alternative Independent School Provision in LB Croydon – The applicant has provided an analysis of alternative independent school provision in the borough. There are no other schools in the area which cater for children from 3 years to sixth form of mixed gender. The closest independent school is Oakwood School (mixed school for ages 3-11) which is due to close and be relocated to Crystal Palace. This may result in

additional demand in the local area. Oakwood School is relocating in order to expand capacity, which highlights demand for private school places in the area. At the date of writing, there are more than 12 students who have made the choice to move from Oakwood School to Royal Russell Junior School as a close and convenient alternative. All the independent schools in close proximity are oversubscribed and have a waiting list of pupils.

8.36 Royal Russell caters for both mixed gender and offers the opportunity to progress from the nursery, through the Junior School to the Senior School. No other school in the area provides a comparable opportunity.

8.37 If the Junior School at Royal Russell did not exist, this would result in approximately 380 pupils returning to the state system, or, more likely, seeking alternative private education. The applicant states that there is a clear demand and educational need for the replacement Junior School at Royal Russell School. The proposed replacement Junior School would therefore make an important contribution to meeting the planning policy objective of paragraph 95 of the NPPF which stipulates that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. The proposed replacement school would accommodate an educational requirement within LB Croydon, and align with Local Plan Policies SP5.9 and SP5.11 which support investment in the improvement and expansion of primary and secondary schools, and the provision, enhancement and updating of pre-school facilities.

8.38 Other special circumstances

8.39 Educational support - The School provides support for disadvantaged pupils setting aside around £3.1m annually to provide pupil fee reductions such as academic scholarships and bursaries for disadvantaged pupils from Croydon, South London and beyond. The reduction allows 72 pupils whose families would have otherwise been unable to afford school fees to access Royal Russell, and their contribution greatly enriches the school community.

8.40 Royal Russell also provides significant support to enhance the education experience of children in other local schools. The school's outreach work with the local community supports and provides additional opportunities to a significant number of local children through knowledge sharing with local and international schools and the sharing of facilities such as their indoor swimming pool. For example, the Junior School invites pupils from six local primary schools to participate in their annual Symposium which is a celebration of teaching and learning, where pupil experience different sports taught by specialist coaches.

8.41 Community use - Royal Russell School plays a big part in supporting key initiatives within the Borough. This includes sharing its facilities with, and providing spaces for community organisations, fundraising events, neighbouring schools, other organisations and businesses, foundations and sports teams. A full list of the community uses the school supports has been provided within the Planning Statement and is attached as Appendix A of this report.

8.42 Through working with the Rowdown Foundation, the Junior School provides its facilities for use by pupils of other schools in the local area who have the drive and ability to expand their learning beyond the normal curriculum, with teachers providing specific teaching and learning expertise. Many of those children are then accepted into

Royal Russell and other local independent schools on life changing bursaries and scholarships.

- 8.43 The new Junior School complex will provide additional facilities to share for community use, such as a MUGA, drama studio, gymnasium, better quality classrooms for the holiday club, and other sports facilities such as the junior soccer pitch. The addition of the new Junior School will therefore enhance what is already offered by the wider School, making a significant contribution. Provision of the new Junior School will enable the school to maintain its estate and facilities, and continue its shared use of facilities with other schools and the wider community.
- 8.44 Employment provision and economic benefits - The School employs over 350 staff, the majority of whom live within a 10 mile commuting radius of the School, with a large number living within the London Borough of Croydon. Approximately 40 staff live permanently at the school to provide support for the 185 pupils who live as boarding pupils on the campus. The school also acts as a purchaser of goods and services from the local economy. Junior School staff numbers total 62. The improved educational offer of the replacement Junior School, and the modest increase in capacity, will help the school to fund the new Junior School building. It is important to safeguard the economic resilience and continuation of the school to help ensure that these jobs, pupil places, pupil support and support of the local economy remains, and indeed, provides for further jobs and economic growth.
- 8.45 Environmental benefits - Due to the layout, age and materials of the existing Junior School it is highly inefficient and unsustainable. The new Junior School will be significantly more sustainable, applying a whole life carbon approach and fabric first approach. The building will be constructed for longevity and durability.
- 8.46 The proposed new building and grounds will promote health and well-being by providing excellent access to daylight and a visual connectivity to nature. The scheme will achieve an Urban Greening Factor (UGF) of around 0.88 (significantly exceeding the minimum value of 0.3, and the current value of 0.16). The strategy includes extensive tree planting, amenity grass, ornamental planting and native wildflower planting. The scheme also achieves a Biodiversity Net Gain (BNG) of 156.7% for habitats and 13.5% for hedgerows.
- 8.47 The proposed building will manage surface water runoff through SuDS strategies that include filter drains, a soakaway, permeable block paving, rain gardens and porous asphalt.

Assessment and Conclusion

- 8.48 Condition 8 attached to planning permission 15/01323/P requires a large part of the existing junior school to be demolished to enable development of boarding houses associated with the senior school on site. Whilst the reasoning for the condition was/is sound, its imposition was significantly flawed as the result is that it proposes significant limitations on the redevelopment the junior school site. The junior school cannot function if the floor area to be removed is as significant as required by the condition. It can be assumed that it was not the purpose of Condition 8 to hamper or harm the functionality of the junior school.

- 8.49 The proposal now before us seeks to re-provide an existing use. It is not proposed to significantly increase educational provision at the school. Evidence has been provided to show the existing capacity of the school. One additional classroom is proposed which will future proof and help to fund the redevelopment.
- 8.50 It is clear that the existing buildings have come to the end of their lifespan and that redevelopment needs to happen. It is also clear that the existing building does not function in a sustainable way. Evidence has been provided to show how the replacement building has been designed to current required standards for school provision and to accord with current Building Regulations and sustainability objectives. Officers therefore consider that the size of the replacement building in the Metropolitan Green Belt has been justified.
- 8.51 The proposed development would have a significantly more compact form than the existing Junior School and the layout and design has evolved via pre-application discussions to ensure the development has the least possible impact on the openness of the Green Belt as possible (further detail in this regard in the section below). The proposed layout provides excellent opportunity to improve the relationship of the Junior School with its woodland setting and to implement a comprehensive landscaping strategy which will increase urban greening, biodiversity and sustainable drainage.
- 8.52 In terms of educational need, the applicant has outlined the importance of retaining the Junior School on the established Royal Russell campus for the business and functional needs of the school. There are no other sites within the Local Plan allocated for a school use. Whilst overall there appears to be space within the state school system to accommodate the 380 pupils were the school to be lost, demand for school places in the area surrounding the school is greater. No other independent schools in the area provide educational provision for the same demographic as Royal Russell School and it is clear that demand for placements at the school are high.
- 8.53 The school has been through a rigorous pre-application process with the local planning authority. Officers have pushed the applicant hard to provide evidence of 'Very Special Circumstances'. The applicant has listened to the local planning authority and have made significant amendments to the layout and scale of the development in light of Green Belt concerns. The number of proposed classrooms have been reduced (by 4) and the massing and layout has evolved to work far more successfully with the existing topography and woodland setting (full details below).
- 8.54 Given all of the above, officers are minded to accept the applicants justification.

Design, Townscape and Heritage

- 8.55 London Plan Policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness. Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape.
- 8.56 In the assessment of this proposal, officers and the applicant have always been very mindful of the Green Belt and woodland setting of the site. The Junior School is surrounded on three sides by extensive woodland and greenery which has driven the design evolution of the development.

Layout

8.57 The position of the proposed new building has been driven by:

1. The necessity to preserve the openness of the Green Belt – The applicant has undertaken an assessment of other locations within the campus that could potentially accommodate the Junior School. Officers considered that siting the building on other undeveloped areas within the campus would have a more detrimental impact on the setting and openness of the Green Belt than redevelopment of this existing brownfield site.
2. In order to enable the existing Junior School to be able to function whilst the new building is being constructed, the positioning and layout of the new building has been largely dictated by the remaining already developed brownfield area. The building is proposed to be largely located over existing hard surfaced playground areas and in place of the existing medical centre which has been demolished.

8.58 Whilst this restricted location presents a challenge and, in many ways, inhibits the redevelopment of the site, it has also resulted in a building that has a significantly more compact form than the existing structures on site. A significant benefit of this is the landscape enhancements that can be made around the building. This is considered to be beneficial in terms of impact on the openness of the Green Belt.

8.59 The smaller available footprint has however also presented the challenge of creating a building that does not have a more dominant and visible presence within the Green Belt setting in terms of height and presence. The massing and form of the proposed building has been significantly altered as a result of the pre-application process, to reduce the height of the structure and to create a building that responds to the natural topography of the site.

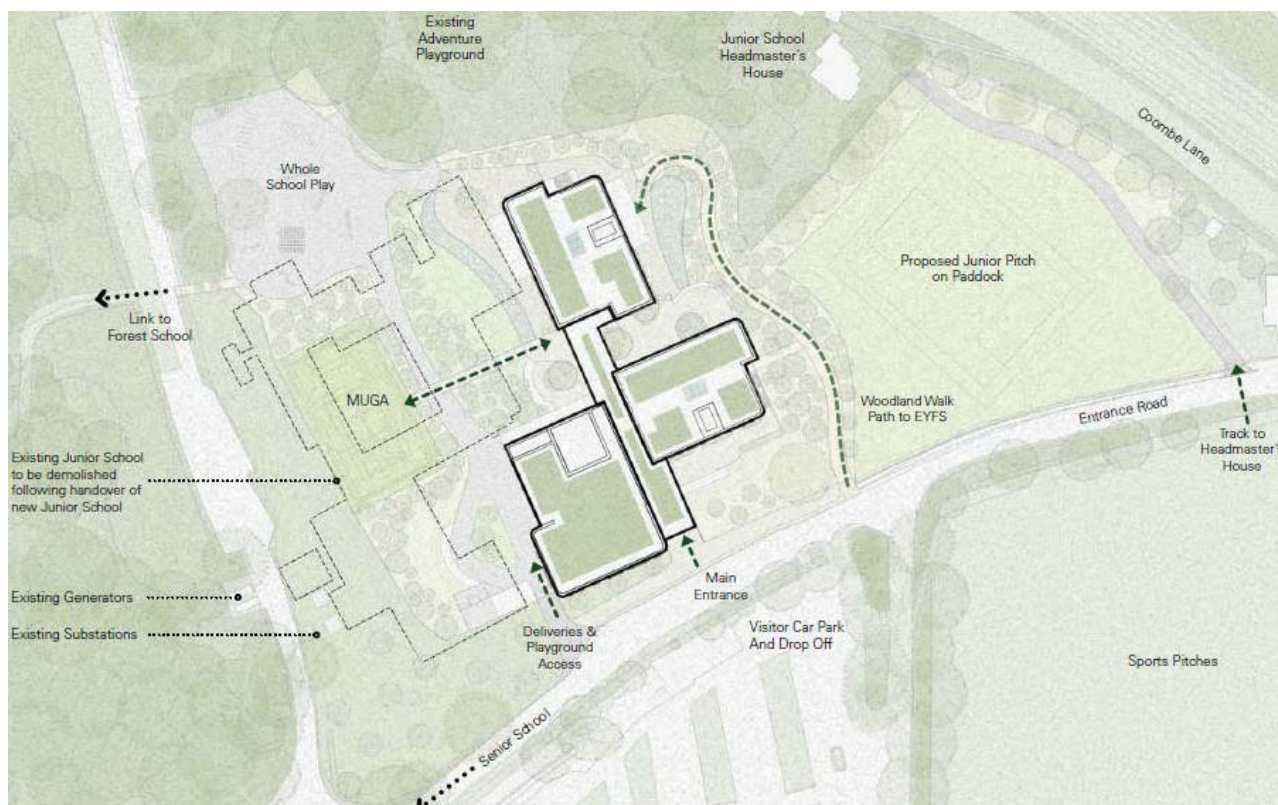


Figure 7: Proposed site layout

- 8.60 The drawing above shows how constructing the new building towards the eastern portion of the Junior School site will enable the current school to remain operational during the construction phase. Once built and operational, all of the existing structures on the Junior School site will be demolished (the dashed buildings on the drawing). The western part of the site will then become a larger landscaped playground, which will present a huge improvement over the current fragmented hardstanding play areas of the Junior School (landscaping discussed below).
- 8.61 The relationship of the proposed Junior School to the approach road is similar in scale and distance to the existing built form. There is a distance of over 120m from the development to the school access point, which provides the only view of the building from within the public realm.
- 8.62 The proposed built form has been broken down into 3 distinct blocks which are interconnected through a main spinal circulation route, and these blocks work with the topography of the site. Breaking up the building mass ensures that the visual presence of the building from the site access is limited.
- 8.63 The layout means that the Junior School's relationship with the rest of the school campus is not altered. The main access road and parking area is unaffected.

Massing

- 8.64 As noted above, the proposed built form has been broken down into 3 distinct blocks which are interconnected through a main spinal circulation route. The northern block hosts the nursery and reception groups (Early Years) at ground floor level, with Year 3 and 4 (Key Stage 2) classrooms above. The more central block hosts Key Stage 1 (Years 1 and 2) classrooms at ground floor level with Years 5 and 6 above (Key Stage 2). The southern most block along the access road offers the administrative function, and shared educational spaces (gym, dining hall, library, science and art rooms, staff areas, kitchen, plant etc).

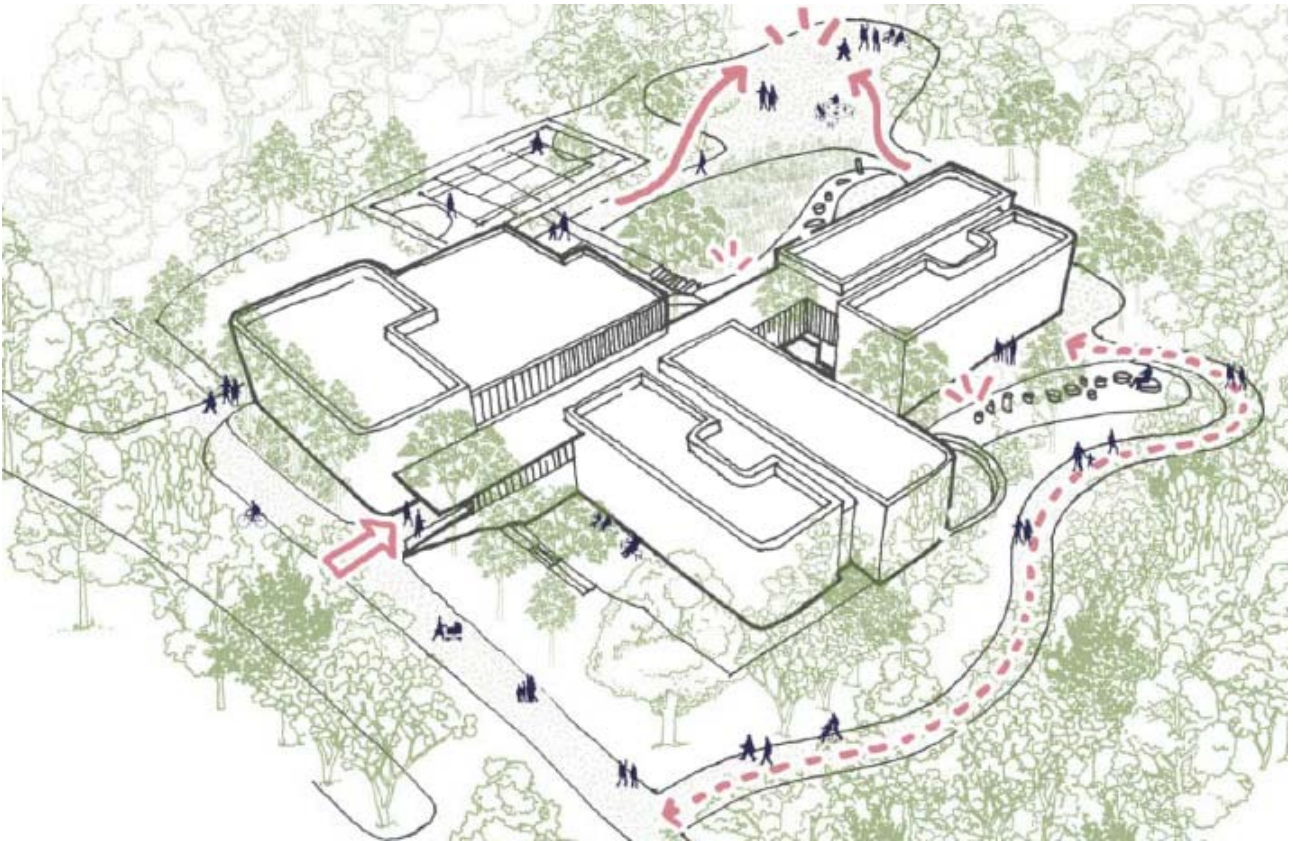
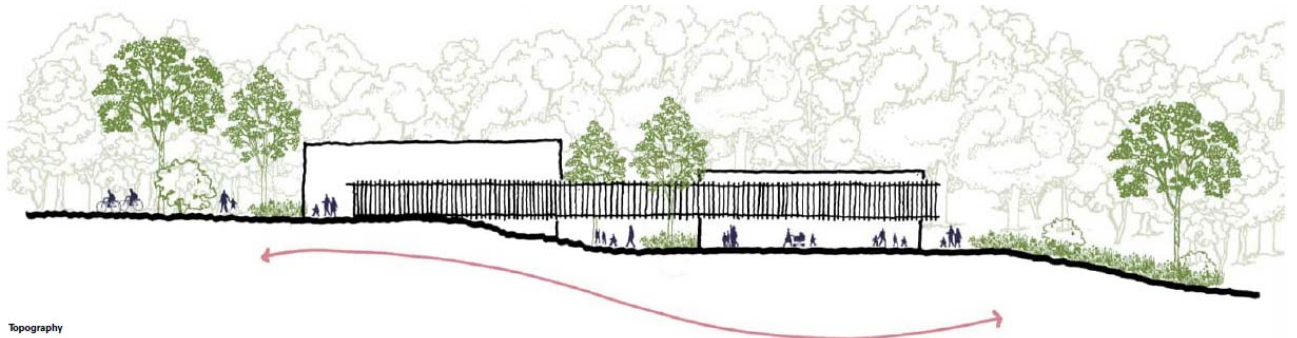


Figure 8: Illustration of massing. Build split into 3 distinct blocks with spinal connection route

8.65 Building heights across the school campus are generally two to three-storey. The proposed building is part two/part three storey and therefore the proposed building is entirely consistent with the rest of the site in terms of height. The massing form has been arranged to align towards the topography, positively using the level change and stepping down in height to the rear of the site. The main building frontage appears as a two storey mass, the lower level concealed by the change in level. The additional blocks then fall with the ground level, appearing as lower and more subservient elements of the overall built form.



Topography





Figure 9: Topography, site section and elevation south to north

8.66 Officers are of the opinion that breaking down the massing into the 3 blocks, and effectively utilising the level change of the site, reduces the impact of the massing when read from the entrance gate and from views from the north. The massing strategy prevents the building from appearing monolithic in mass which is felt to lessen the impact on the natural Green Belt setting. The overall height allows views of the woodland to be seen behind the built form which helps the building to nestle into the green setting of the campus.



Figure 10: Comparative Photomontage - Approach Road View.
Top image: Existing. Bottom image: Proposed

8.67 When viewed from the playground area to the west of the site (see Figure 11 below), it can be seen how the building steps down in level towards the woodland to the rear.



Figure 11: Proposed view from main playground (to the west of the site)

8.68 Whilst land levels fall from south to north across the site, and the building layout and design strategy does take advantage of this change, notable excavation will be required to achieve the level changes as indicated. Excavated soil will be redistributed across the site. In order to create an accessible and level multi use games area (MUGA) (as indicated in the view above), land levels to the west side of the building will be built up in part to achieve the required standards. This part of the site will not be overly visible from the front of the site as the land levels will still be lower than the existing at the frontage. This area will be well-screened by planting, and the banked built up to the western side will be covered with new woodland planting which will screen the MUGA from other parts of the campus. As such, the proposed level changes are not considered to have any harmful impact in terms of visual amenity.

8.69 The central spinal circulation bridge along with the step back of the eastern block, serves well to provide a legible and notable building entrance. The entrance also provides a linear contrast from the main blocks, which works well to separate the massing.



Figure 12: Proposed view of school entrance

8.70 Further back within the site, the central spinal circulation bridge offers a break at ground floor level which, again breaks up the massing, and provides a connection between the east and west playgrounds (see Figures 9 and 11 above).

8.71 The existing buildings on the school campus comprise a series of connected rectilinear forms composed to an orthogonal geometry (see Figure 13 below). The proposed new buildings follow this strategy (See Figure 14 below). There are also examples of historic buildings that comprise rounded building corners to soften their appearance, for example the Chapel as shown in Figure 15 below. This approach has been utilised to soften the appearance of the built form. Given the woodland setting, and the fact that the building is for younger children, officers consider this approach is successful. The buildings appearance is softened and welcoming, providing a gentle edge against the landscape setting beyond.



Figure 13: Main school campus built form

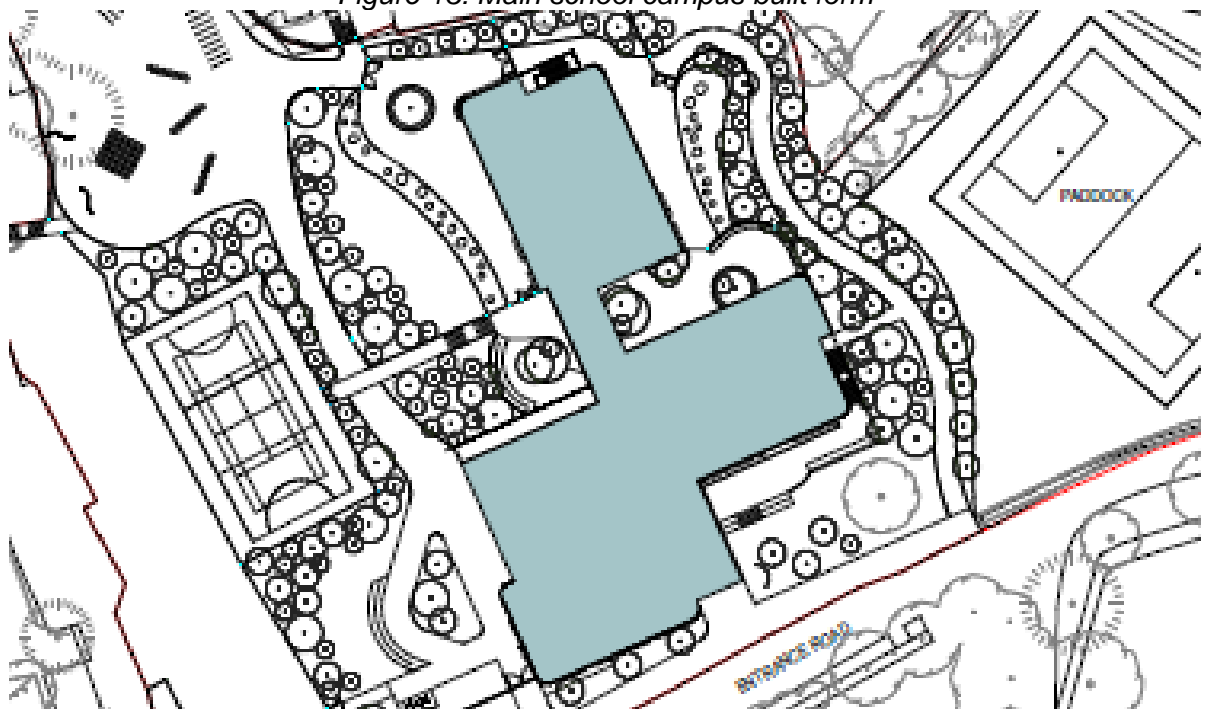


Figure 14: Proposed building layout



Figure 15: Rounded features to Chapel, with Great Hall to the left and Dining Hall to the right

Architectural Expression

- 8.72 The current buildings on the school site are limited in materiality. They are typically two-tone using red brick with ashlar stone facings (as can be seen in Figures 13 and 15 above). This strategy of having a limited materials palette is to be used for the proposed Junior School. The proposed external materials predominantly comprise brick and timber.
- 8.73 The three main blocks are defined by brickwork comprising of two tones. The frontage block comprises the main entrance and focal point of the building. It comprises a dark red brick that mirrors the tone of the brick that can be found in the historic buildings on the wider campus. The rear upper-level element of this block is finished with timber cladding. The purpose of the timber is break up the overall massing of the block and to resonate with the woodland surrounding.
- 8.74 The two rear blocks are divided by the horizontal datum point, with the darker red brick hue represented along the lower portion which are designated to show the split in ground level and topography and ground to building into its setting. A lighter hue is proposed for the upper storey which reduces the overall massing of the proposed blocks and provides a more desaturated tone which helps the building to blend with its natural woodland setting.
- 8.75 Timber has been used to form the circulation spine which connects the three blocks. The timber along the building entrance point and canopy over indicate a clear and warm entry point to the building. The green roof over the canopy further enhances the entrance and ties the building into its natural setting.



Brickwork in warm and light tone as the primary external material



Vertical stack bond brickwork to parapet, above and below windows, and special areas of interest



Warm timber treatment to the central spine and rear of the front block



Timber fins in front of glazing to provide operable vents and solar shading



Climbers and planting feature heavily around the building



Bio-diverse green roof



Brise soleil to teaching space external glazing

Figure 16: Proposed materiality

8.76 Recessed features around the windows and openings align with features present in other buildings within the campus. These features break up the mass of the built form and add visual interest. Brise-soleil are provided to create shade so that solar gains are minimised, the depth and height has been tested for typical sun angles to maximise their effectiveness, and also to allow generous views out. The brise-soleil will be integrated into the window system framed with aluminium to match the window frames, with timber slat inserts.

8.77 The main entrance as shown in Figure 16 above has been designed to ensure this main focal point of the building is clearly defined and legible. A large school crest will be set within the brickwork and signage will be situated above the main walkway. A generous entrance area is provided under the entrance canopy to allow for congregation. Planting will wrap around the front corner to provide an attractive feature in this area. Reclaimed stained glass pieces from the existing junior school will be used to decorate the reception area and incorporated along glazing in the spine of the structure.

8.78 The main student access into the site (For Key Stage 1 and 2) is to the western side of the front block. In order to maintain the legibility of the main school entrance, it is proposed to utilise decorative fencing/gates to clearly define the students access route. Full details will be secured by condition.



Figure 17: Proposed view from south west (from main school buildings)

Visual impact from external and other ancillary works

8.79 The position of the new building and pedestrian access routes to it, marginally eastwards of the existing Junior School, site, means that the existing vehicle access to the headmaster's house is lost, as is a small part of the existing paddock. A new vehicular access to the headmaster's house is proposed to be constructed to the western side of the site. This will sit behind existing mature vegetation so will not be visible from outside of the site. It will be constructed of grasscrete which will help it to blend into the open Green Belt setting.

8.80 The Paddock will be utilised for more formal outdoor sport and will comprise a pitch laid out for junior football (further details provided in section titled 'Impact on Sports Pitches' below). This area will remain covered in natural turf, with a new formal pitch laid out. This is not considered to have any harmful impact on the current open visual amenities.

8.81 The Multi Use Games Area (MUGA) is accepted to be a necessary part of the Junior School provision and a common feature found on school sites. Such a facility is usually quite visually intrusive by reason of its size and nature. The proposal makes attempts to blend the construction into its surrounds as far as possible. This includes using green coloured coatings to the surface. The MUGA will be surrounded by new woodland, tree planting and wildflower meadow which will, over time, screen and soften the appearance of the structure. Overall, it is considered that the MUGA has been designed as sensitively as is possible to enable it to sit comfortably within its surroundings.

8.82 The existing topography has provided some challenges in providing inclusive and accessible circulation and entrances, particularly to the early years block to the rear. A lengthy path is provided, working with the levels. This is proposed to be surrounded with new woodland planting and other soft landscaping to soften its appearance and integrate it into the surrounding natural environment.

8.83 The extensive soft landscaping is considered to have a hugely beneficial visually impact, full details below.

Public Art

8.84 In order to enhance and express local character, Local Plan Policy DM14 requires all major schemes to include public art that creates local distinctiveness and reinforces a sense of place, responds to local character, makes a positive contribution to the public realm and engages the local community in its creation.

8.85 The applicant is keen to incorporate artwork into the proposals, and this will include:

- Creative use of brickwork and fabric of the building to include the Royal Russell Crest and motto 'not for oneself but for all'
- Renovation of the historic stained glass windows in the existing Junior School, for inclusion in the fabric of the new building.
- Student created art which will be created as part of GCSE and A-Level coursework and included as part of their external art installations.
- Creation of a 'Fourth Plinth' externally to display artworks, to be used for local artists work and students.
- Use of student photography throughout the building to create a sense of community and warmth.

8.86 Officers are supportive of the public art proposals put forward by the applicant. A condition will be imposed to secure the programme of works and the ongoing management thereof.

Heritage

8.87 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Local Plan Policy SP4 requires developments to respect and enhance heritage assets. Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy DM18.7 states that substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.

8.88 The entire school site is a Locally Listed Historic Park and Garden. The Main Lodge of the school (approximately 100m to the north of the junior school site separated by woodland) and part of the main school building (within the main school complex, almost 200m to the south west of the junior school site) are on the Council's Local List of buildings of Architectural or Historic Value. Old Ballards Cottage to the far south of the school campus is a Grade II statutorily listed building (over 300m from the Junior School site). The existing Junior School complex itself contains no buildings of historic significance.

8.89 The applicant has submitted a Historic Environment Record (dated August 2023) that thoroughly describes the existing assets of historic interest across the entire school

site. Given that the closest buildings of historic merit are well separated from the proposed development site, in terms of distances and by woodland and existing built form, it is considered that the significance of the surrounding heritage assets would be preserved by the proposed development and the nature of the proposal (replacement building in the same use) would have no impact on the functionality of these structures.

- 8.90 In terms of impact on the Locally Listed Historic Park and Garden, the woodland context and coverage preserves the plantation character of Ballards Estate and its associated assets. The majority of the proposed development reuses the site of the existing 1960s Junior School, within the extant elements of the 19th century estate and its heritage assets, without altering their interrelationship or their significance.
- 8.91 The proposal will lead to the removal of 3 trees however will also see extensive new woodland planting and landscaping provided. Further details with regard to landscaping and trees are fully discussed in the section below. As such, the proposals are not considered to have any adverse impact on the setting of the Locally Listed Historic Park and Garden.
- 8.92 The wider school campus lies within Addington Hills Tier II Archaeological Priority Area. A desk-based Archaeological Assessment has been submitted. Historic England Greater London Archaeological Advisory Service has assessed the submitted information and concluded that there is a discernible archaeological potential. The proposal could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two-stage archaeological condition would provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Impact on Sports Pitches

- 8.93 To the east of the Junior School is an open space known as the 'Paddock'. The space is used for informal play and occasionally overflow car parking. The area has an area of 3,413sqm. Due to the positioning of the replacement school and associated landscaping and access, approximately 505sqm of the paddock will be lost along the western edge.
- 8.94 Paragraph 99 of the NPPF (2023) states that existing open space, sports or recreational buildings and land, including playing fields, should not be built on unless:
- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 8.95 Sport England is a statutory consultee if any proposal affects any part of a playing field. Sport England's Playing Fields Policy (updated Dec 2021) says that Sport England will oppose the granting of planning permission for any development which would lead to the loss, or would prejudice the use of all or any part of a playing field or land which has been used as a playing field and remains undeveloped, unless the development as a whole meets with one or more of five specific exceptions as outlined in the policy.

- 8.96 The Paddock has accommodated an under sized 7v7 junior football pitch delineated by mobile goal posts. The area of playing field remaining after the proposed development would be capable of accommodating a formally marked out FA compliant 5v5 football pitch. This is therefore a net loss of playing field and capacity on this part of the school site.
- 8.97 However, the redevelopment of the school buildings would release another part of the application site to provide a new sport lit Multi Use Games Area of 725 sqm to Sport England design guidelines. The proposed MUGA will provide an overall increase in outdoor sports area of 220sqm that will be made available to the wider community outside of school hours. Internally, the existing single height gym would be replaced by a double height space of slightly greater floor area.
- 8.98 Sport England concludes that the proposal broadly meets exception 5 of their Playing Field Policy that is, '*The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.*' The assessment is subject to the new MUGA and grass football pitch being secured by condition. Sport England have also requested a condition requiring a community use agreement to be prepared in consultation with Sport England.

Trees, landscaping and biodiversity

Trees

- 8.99 The whole of the Royal Russell Campus is a Locally Listed Historic Park and Garden. The site largely comprises woodland, and extensive areas of woodland are located directly to the north and west of the Junior School area. The site is subject to 2no. Tree Preservation Orders (TPO 27, 1970 and 27, 2014), however neither relate to trees which are close to the Junior School site.
- 8.100 In order to facilitate the development, 3no. trees have been identified for removal – Trees T1 (C.2), T10 & T11 (B.2). The category B trees are self-seeded sycamores. T10 is required to be removed to accommodate the new building. T11 is required to be removed to create a compliant access to the school building in terms of gradient (i.e. as a result of required level changes). The applicant explored options to relocate the trees, however it was considered that the challenge and cost of doing so (by reason of their size and chances of survival) would be better spent in providing new trees to mitigate their removal.
- 8.101 The school has expressed that they will explore ways in which the timber from the trees can be re-used on site, for example through the creation of artwork or for habitat creation.
- 8.102 The tree survey recommends a further 5 trees for removal due to declining health or because they are already dead. These are not to be removed to facilitate the development, but because they are in ill health and are considered to pose a risk, and would have been removed regardless in accordance with good arboricultural practice.



Figure 18: Proposed Tree Removals

8.103 In terms of mitigation a total of 175 new trees will be planted on site and over 2,500sq of woodland proposed to the western edge of the site. The proposed tree species are predominately native and selected for their robustness to site conditions, extended seasonal variety and their ability to quickly give a sense of presence and structure to the landscape. As well as this, careful species selection will allow opportunity to harvest materials for craft making e.g. willow, hazel or chestnut coppicing. Within the woodland, wildflower seeding is also proposed.

8.104 The Tree Officer has commented that the removal of the trees is vastly outweighed by the proposed replanting of trees once the development is completed.

8.105 Existing trees on site will be protected during construction. Details within the Arboricultural report and Tree Protection Plan will be secured by condition. Site monitoring reports will be required to be provided by condition to ensure that the local planning authority is kept aware of ongoing protection and progress at the site.

Landscaping

8.106 The existing external play areas are predominantly hardstanding. A notable positive of the proposal is that there is scope to provide significant enhanced landscaping in and around the Junior School site. This is aided by the more compact form of the proposed building in comparison to the existing built form.

8.107 The layout of the proposed building, with the main spinal circulation route presenting as a bridge between the front and rear element, allows for landscaping and play areas to flow between and around the building. The main playground area sits to the rear of the building and the new MUGA to the west, and all external areas are surrounded by greenery. The planting strategy includes extensive tree planting, ornamental planting and native wildflower planting.

8.108 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site. The Urban Greening factor (UGF) is a tool to evaluate the quality and quantity of urban greening. The UGF of the existing Junior School is 0.16. This scheme should achieve a minimum UGF target score of 0.3. The landscape proposals achieve a considerable uplift with an UGF 0.88, significantly exceeding the minimum value of 0.3.

8.109 The woodland setting of the Junior School will be preserved and enhanced by the proposals. The scheme successfully integrates the new building into its green woodland context through the creation of learning environments set in nature, setting the building back from the entrance road which provides opportunity to plant in front of the building, and surrounding the building within planted margins and climbing plants.



Figure 19: Proposed Planting Strategy

Biodiversity

8.110 Much of the school campus is within Ballards Plantation Site of Importance for Nature Conservation (SINC). The junior school site itself is not within this designation however the land surrounding the site is. The site immediately abuts woodland and the site itself contains mature trees. An Ecological Appraisal has been undertaken for the site which includes an Extended Phase 1 Habitat Survey and bat surveys including ground level assessment and bat roost assessment of buildings within the site.

8.111 Royal Russell School and Ballards Plantation SINC is designated for its woodland and grassland habitats. In terms of the assessment and impact of the development on the SINC, the GLA considered that the initially submitted appraisal did not go far enough assess the potential impacts. The applicant subsequently submitted an updated Ecological Appraisal (dated October 2023) which provides additional assessment. The appraisal notes that due to the close proximity of this designated site,

there is potential for impacts to occur from proposals in the absence of mitigation, including from root compaction, accidental damage and contamination and indirect impacts of noise, shading and lighting during construction.

8.112 The appraisal states that the woodland habitat and SINC will be retained and protected during construction to avoid any adverse impacts, via the implementation of best practice construction measures including; secure storage and safe disposal of any materials to prevent accidental contamination; measures to prevent/reduce dust; control of surface water runoff; measures to minimise vibration and noise; lighting directed away from the woodland edge. Trees will be protected. The footprint of the proposal, similar in location to the existing school buildings will not cause any additional shading onto the adjacent SINC.

8.113 In terms of habitat, the site is comprised of hardstanding, buildings, amenity grassland, broadleaved woodland, and scattered trees. All the habitats except hedgerows and scattered trees are of low to negligible ecological value. The proposed development will be focused within these lower value areas within the site. The hedgerows and scattered trees are considered to be of higher ecological value given their role of provision of habitat for species to shelter and forage. The proposals will result in the loss of some amenity grassland and 3 scattered trees. To mitigate, a significant area of tree planting is proposed to the western part of the site.

8.114 In terms of protected/notable species:

- Bats – The majority of scattered trees within the site are identified as having negligible potential to support roosting bats. One tree in the north east of the site is identified as having low bat roost potential. The junior school building itself is identified as having low bat roost potential. No roosts were recorded during the emergence survey and no bat activity was noted. The woodland to the north and east one. of the site makes more suitable foraging, commuting and roosting habitats for bats. Mitigation is suggested in terms of the removal of the trees on site, and in terms of any proposed lighting within the site.
- Badgers – No badger setts were recorded within the site, however within the woodland 60m to the north of the site, signs of badger were identified. The site provides areas of amenity and neutral grassland in which badgers could forage. Given that badgers are known to be within the area and the mobility of the species, further survey work is required. Prior to the commencement of any works, an updated inspection must be undertaken to ensure that no badgers have moved to the site and established setts. If new setts are identified, depending on location, a Natural England licence may be required.
- Great Crested Newts (GCN) - No ponds are recorded within the application site and as such the site is not considered suitable to support breeding habitat for GCN. However, within the wider school grounds a low population GCN have previously been recorded in a pond 100m to the west of the Junior School building, during surveys in 2018. Adjacent amenity grassland could provide suitable terrestrial habitat for foraging. The pond is separated from the from the site by hardstanding, buildings, fencing and amenity grassland and as such it is unlikely that GCN would be transiting through the site. To ensure no impacts occur in relation to GCN, precautionary mitigation measures are proposed in the form of gradual habitat clearance, search of habitat features under ecological supervision, installation of exclusion fencing to ensure GCN do not transit through the site during construction.

- Reptiles – The site supports little suitable habitat for reptiles, including a small area of longer sward amenity grassland which provide opportunities for reptiles to bask and forage. Precautionary mitigation approach recommended as per for GCN above.
- Birds – The site supports suitable habitat for common bird species to nest within the scattered trees and shrubs. There was no evidence of nesting birds identified within the survey. Mitigation is recommended with regard to timing of tree/habitat removal.
- Invertebrates – The site includes small area of suitable habitat for invertebrates such as the stag beetle, this includes woodland habitat, hedgerows and log pile within the playground. Mitigation includes destructive search of features under ecological supervision and any species found relocated to suitable habitat within the vicinity. Like for like replacement of ground features such as log piles.
- Hedgehogs - The site provides a small area of suitable habitat for hedgehogs to forage including neutral grassland and hedgerows.

8.115 The Council's ecological consultant has reviewed the submitted information and is satisfied that with appropriate mitigation measures secured by condition, the development can be made acceptable in terms of impact on designated sites, protected and Priority species and habitats. The mitigation measures identified in the Ecological Appraisal (and as outlined above) will be secured by condition. A Construction Environment Management Plan (CEMP) will be required to demonstrate how species will be protected throughout the construction period and a wildlife friendly lighting scheme required to be provided.

8.116 Our ecologist has requested the removal of some London Invasive Species from the site which is necessary in order to conserve and enhance protected and Priority species. It will be ensured that the full landscaping proposals (as required by condition) will incorporate this request.

8.117 The NPPF and London Plan Policy G6 require that any development seeks to provide Biodiversity Net Gain (BNG). The site comprises of relatively low value habitats, with a few high value features, but there is opportunity to create new habitats and enhance areas of existing higher ecological value through habitat creation and management measures. A technical BNG Assessment (dated August 2023) has been undertaken by the applicant. The proposals are expected to result in a BNG of 156.7% for habitats (a net gain of 4.20 habitat units in the form of grassland, woodland, individual trees, shrubs, rain gardens) and 13.5% of hedgerows (a net gain of 0.15 hedgerow units), far exceeding the target of 10%. The Ecological Appraisal also suggests that log/brush piles and bat and bird boxes can be installed. Full details of a biodiversity enhancement strategy and biodiversity gain plan will be secured by condition.

Functionality of the new building

8.118 The applicants design team have worked closely with the school to develop a building that meets their functional needs and adhere to current required standards and regulations.

8.119 The proposed lower ground floor plan of the Junior School is divided into two distinct volumes. The northernmost block is sited amongst the woodland and accommodates the Nursery and Reception classrooms with dedicated external areas and entrance. The landscape is intended to flow around the building to provide a fluid teaching environment with direct access from the classrooms to the external play areas. The main circulation spine takes the form of a bridge above, providing covered access to the remainder of the school.

8.120 To the south, the years 1 and 2 classrooms are arranged as a Key Stage 1 cluster and also have direct access to dedicated KS1 outdoor play areas. The music classroom and gymnasium are also located on this level where it benefits from direct external access to exterior play space and sport court.

8.121 The ground floor is accessed from a clearly defined single-story entrance which leads to the school's main circulation spine, following the topography of the site and flowing down to the lower ground floor and exterior play space via a gathering staircase. Views down into the gymnasium on the level below and breaks between the building volumes along the bridge offer glimpses of the surrounding landscape. The main visitor reception, administration offices and meeting room are located to the front of the school, in close proximity to the main entrance, while Key Stage 2 teaching clusters (years 3-4 and years 5-6) to the east and north benefit from having an outlook into the surrounding woodland. To the west, the dining hall opens out into an exterior dining space and the playground beyond.

8.122 An open stair flows up and over the gathering stair and provides access from the main circulation spine up to the first floor. The library is located at the heart of this upper level, with expansive views towards the east. Also located on this floor are the specialist science lab and art / design technology studio, as well as the staff common room with a roof terrace overlooking the playground.



Figure 20: Proposed floor plans – Lower ground, ground and first

8.123 Externally, playspaces for the nursery, reception and KS1 year groups are located directly outside of the classrooms. Level changes, low level fencing and planting will separate early years provision from the older year groups. Spaces will be provided to

enable external dining, teaching areas and amphitheatres. A MUGA is proposed which will provide required facilities for formal sports to Sport England standards. The site will maintain its existing good links to the existing forest school to the west and adventure play area to the north.

- 8.124 In terms of access, direct visitor and staff access will be provided via the main entrance to the front. A new footpath via a ramped woodland walk is proposed to be provided to the nursery and reception area. Separate access is provided to the western side of the building for Key Stage 1 and 2 pupils via a new asphalt access road. Segregated access is provided for deliveries and servicing to the western end of the frontage. Emergency vehicle access is provided to the west side of the building.
- 8.125 Inclusive design – London Plan Policy S3 seeks to ensure that education facilities are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach, this includes internal and outdoor space. The application submission states that the proposal is fully inclusive with all ramps meeting the relevant regulations. Whilst there are some areas within the proposal that are stepped, there are also alternative ramps to provide full accessibility. Two lifts are provided within the building making all facilities fully accessible.

Impact on neighbouring residential amenity

- 8.126 Given that the proposed development is to be situated on the same site as the existing school, and the significant separation distances to adjacent neighbouring properties and woodland coverage, the proposals will not cause any harm to the amenity of any residential property way of causing any loss of light, outlook or privacy. No additional environmental impacts will be created e.g. noise or light pollution in comparison to the current situation. The scheme proposes the potential for 20 more pupils to be accommodated at the school and when considering the current 1,150 pupil capacity across the whole school, the increase is not expected to create any undue cumulative impacts.
- 8.127 All representations that have been made by adjacent residents are with regard to school access from Hollingsworth Road. This issue is discussed in the section 'Highway and Transportation matters' below.

Highway and Transportation matters

- 8.128 The site is predominantly accessed from the main Coombe Lane entrance point. This entrance provides access to all on-site parking facilities, the main school drop-off/pick-up point and provides access for all servicing and deliveries of the site. There is also a pedestrian access from Hollingsworth Road, a residential cul-de-sac to the southern side of the school campus, however this access gate, whilst on land in the ownership of the school, is located outside of the red line of the application site and is located approximately 300m (as the crow flies), from the edge of the application site.
- 8.129 At the main vehicular entrance point, the site has a Public Transport Accessibility Level (PTAL) of 2, Coombe Lane tram stop is approximately 160m from the school entrance (3 minute walk). This tram runs to New Addington and Wimbledon (via Croydon).

8.130 The proposal will increase the capacity of the Junior School from 380 pupils to 400 pupils, with no increase in staff numbers. The existing school as a whole on the Royal Russell campus has approximately 1,150 pupils, and 350 members of staff.

Access and car parking

8.131 There are no proposed changes to the vehicle access arrangements of the site or to the car park opposite the replacement Junior School. The replacement school building will have two main pedestrian entrances located at ground floor and lower Ground floor level with step-free access provided for both access points and throughout the building. A new footway will be constructed along the Junior School's frontage and zebra crossings will be provided to facilitate access between the visitor/parent car park and the school.

8.132 In terms of the safety of the existing Coombe Lane access, the Transport Statement (TS) identifies that one accident has occurred at the access from 2017 to date. The TS finds that the uplift in capacity of 20 pupils could generate an additional 15 car trips to the site. In reality these would be staggered when taking into account breakfast and after school clubs. However as a worst-case scenario, the increase of 20 extra car trips represents a 2.4% increase at the Coombe Road junction during the AM peak and 2.5% increase during the PM peak. It is not considered that this marginal increase in pupils will cause any significant additional impacts in terms of the highway safety of the access or capacity issues on the surrounding highway network.

8.133 The existing car parking arrangements at the school are not proposed to be changed as a result of the proposal. The car park is highly managed by school staff during the morning drop-off and afternoon/evening pick-up periods. The addition of 20 students will fall within the daily fluctuations of the use of the car park.

8.134 Transport for London (TfL) have commented that the existing parking arrangements do not align with London Plan policies which support Mayoral mode shift objectives. The amount of parking overprovides in comparison to London Plan maximum standards. As well as this, the school does not accord with London Plan policy requirements in terms of amount of blue badge bays provided across the site. Whilst this is noted, officers recognise that this is an existing situation and that the proposed development in itself will have a minimal impact in regard to the parking demands at the site. Reduction in reliance of the private car is a policy requirement and officers consider that this should be addressed as part of wider on-going measures captured as part of the School Travel Plan (see further comment below). Officers do not consider the existing overprovision of car parking across the site to be a justifiable reason for refusal of the current application.

Access via the Hollingsworth Road entrance

8.135 There is an existing pedestrian access into the wider school site from Hollingsworth Road to the south of the school campus. The applicant states that this access has been in situ since the school was founded at the site in 1924, however neighbours contend that the access has been in place since 1969 and not always used for pupil access. Nevertheless, this access point is historic and in situ. Numerous objections have been received with regard to the use of this entrance for drop-offs and pick-ups which neighbours have stated cause a significant highway and personal nuisance for residents of the cul-de-sac. It must be noted that this is an existing issue and falls outside of the application site for this proposal. It is considered that it is not directly

related to the current proposal, as set out in the paragraphs below. The existence of the access was omitted from the initially submitted transport information.

- 8.136 As a response to the objections that have been received, the applicant has provided supplementary transport information. The proposed development will reprovide an existing established education facility and the development will increase student capacity by 20 pupils. No change to staff numbers is proposed. Based on a recent travel survey within the junior school, the Transport Statement calculates that the effect of 20 additional children associated with the replacement junior school would be 14 additional car trips, 1 child in a shared car journey, 1 journey via school bus, 1 child walking, 2 by tram and 1 additional park-and-stride trip.
- 8.137 Given that drop-off for most of the junior school children involves a grown up parking and waiting within the school grounds, most of the resultant transport activity is focused on the school's main car park. The junior school is located on the opposite side of the school grounds relative to the Hollingsworth Road gate. It is probable that the Hollingsworth Road gate is predominantly used by older students who are capable of walking to the school unaccompanied.
- 8.138 Nevertheless, the applicant has identified that 'park-and-stride' represents approximately 3% of junior school trips which is the equivalent of 11-12 existing vehicles, which may form part of the existing vehicle activity observed by residents on Hollingsworth Road. For the additional 20 students, an increase in 1 park-and-stride trip is expected, which could be from Hollingsworth Road.
- 8.139 The school acknowledges the concerns raised by residents of Hollingsworth Road and as a response is seeking to improve conditions where practical to do so. As an immediate response, school staff have patrolled the area and have spoken with parents asking them not to park on the road, leaflets have been handed out to parents and to local residents. The school has sent email correspondence to parents discouraging use of Hollingsworth Road and outlined traffic calming measures to help streamline the drop off process. The school Travel Plan has also been updated as part of the application to aim to reduce car usage, full details of which are outlined below.
- 8.140 Reconsultation was undertaken following the supplementary information provided by the applicant and it is clear that residents do not find the applicants response satisfactory.
- 8.141 Whilst representations have called for the gate to be closed, it is noted that there are pupils and staff who live nearby and legitimately walk to the gate. Closing the gate would potentially mean that those people would drive instead, which is fully discouraged. Further, the gate needs to remain in place for emergency access as well as grounds maintenance.
- 8.142 Whilst the concerns raised are fully acknowledged by the local planning authority, the issue raised must be considered in the context of the remit of the development proposed. Given that this is an existing matter, and as outlined above, the proposals themselves will have a minimal impact in this regard, officers do not consider it prudent to impose punitive measures to restrict access via this gate as part of the determination of this application. It is noted that more recently, the school has taken the decision to close the school gate in response to the concerns raised by residents. However, it is considered that it is outside of the remit of this current application to secure the closure of the gate by condition. This is because such a condition would not meet the tests

outlined in paragraph 56 of the NPPF and national Planning Practice Guidance. It is proposed that conditions and planning obligations be added requiring a school travel plan (and its monitoring) and a construction logistics plan and that this is sufficient to control the impacts of the specific development proposed in this application.

Cycle parking

- 8.143 London Plan Policy T5 'cycling' describes that development proposals should help to remove the barriers to cycling and create a healthy environment in which people choose to cycle. Cycle standards for school use is 1 space per 8 FTE staff and 1 space per 8 students. There should also be 1 short-stay space per 100 students. This would equate to 50 bays for the 400 pupils at the Junior School and 8 bays for the 62 members of staff. Short stay visitor bays should also be provided. TfL have commented that cycle parking facilities in line with London Plan standards should be provided across the site, in both number and to provide accessible bays.
- 8.144 There are existing cycle parking spaces placed around the school site. The TS says that there is a low uptake of spaces and these are predominantly used by school staff. There are currently 30 scooter/bicycle space adjacent to the existing junior school and 28 spaces provided at the boys and girls secondary boarding houses. Photographic evidence shows that only 2 cycles occupy these spaces on a typical weekday. Scooters have been found to be used more (9 scooters).
- 8.145 There are no cycle lanes on Coombe Lane and the road has a high volume of traffic. The school is located at the top of a hill. In this location, cycling is not common or particularly recommended for students.
- 8.146 Given the above, it is not considered in this instance and at this time, that the provision of extensive cycle parking facilities are a worthwhile measure to secure sustainable transport improvements. It is noted that in the School Travel Plan (discussed below), extra cycle parking bays will be provided if demand increases.
- 8.147 In response to GLA/TfL comments, the applicant has amended the plans to include the provision of 10 cycle bays within the Junior School grounds, to demonstrate that the school is committed to improving sustainable transport options. A new covered scooter enclosure is also proposed to be provided for the Junior School pupils. This is considered to be sufficient and full details of the cycle and scooter parking enclosures will be secured by condition.

Sustainable transport measures

- 8.148 The TS includes a survey of existing travel habits of the junior school pupils. The results of the travel survey demonstrate that around 72% of junior school children are brought to school by car. The survey also highlights that a notable number of parents would prefer to use more sustainable means of travel.
- 8.149 Given that a high percentage of pupils do arrive by car, measures to encourage more sustainable means are sought.
- 8.150 The TS states that the school already operates a comprehensive Travel Plan which applies to the junior and senior schools and travel surveys are undertaken regularly. A new Travel Plan has been developed which builds on the existing Travel Plan. The document aims to encourage staff and students to travel by sustainable modes and to

reduce the use of private car to 61% by 2027. Outlined measures to encourage this include:

- Promoting the uptake of the school bus
- Educating pupils with regard to road safety
- Educating pupils on sustainability – sustainable transport and the effect of carbon on the environment as part of the curriculum,
- Promotion of travel information to pupils, parents and staff
- Personalised travel planning service for all staff
- Walking to school initiatives including challenges and events, encouragement of park and stride
- Cycle training courses
- Cycle schemes to encourage staff to travel by bike.
- Cycle parking stands will be increased if demand increases

8.151 Given the significant reliance on the private car, the Travel Plan is an essential tool going forward to achieve a reduction in car use. It is considered that the Travel Plan can go further and can provide some more concrete targets to ensure that car use is reduced. These improvements will be secured via legal agreement in conjunction with transport colleagues. The legal agreement will also secure the monitoring of the Travel Plan for a 5 year period.

Deliveries and servicing

8.152 Deliveries to the site will be undertaken in line with existing arrangements at the site. Drivers park at the delivery point which is signposted within the site and all deliveries are received at the main reception. It is not anticipated that the replacement Junior School will generate additional demand for deliveries.

8.153 Storage for general waste and recycling will be provided to the western side of the new building. As per the existing arrangement, waste from the junior school will be collected each day by the facilities team, and transferred to a central location for the whole site. Waste for the whole school is then collected from this central location outside of usual school hours to ensure the health and safety of pupils. There will be no change proposed to this strategy. An Operational Waste Management Plan has been provided outlining the above and will be secured by condition on any permission granted.

8.154 The submitted Delivery & Servicing Plan outlines initiatives to minimise the impact of delivery and servicing activities on the local road network such as: seeking sustainable suppliers and alternative modes of transport for freight such as electric vehicles or cargo bikes, advising drivers to switch off engines when the vehicle is stationary, encouraging staff to not arrange deliveries to the school, encouraging boarding students to reduce the number of online orders (e.g. by grouping items to be delivered etc). The details within the plan will be secured by condition on any permission granted.

8.155 TfL have commented that they expect all deliveries to avoid the peak hours of 08:00 – 10:00 and 16:00 – 18:00. The applicant has updated the Delivery and Servicing Plan to limit deliveries during the two main peak hours (8-9am and 3-4pm), as these are the actual peaks associated with the Junior School. The Delivery and Servicing Plan states that there are currently on average 18 deliveries per day to the school campus which is insignificant against the existing traffic flow on Coombe Road and there are currently no restrictions on hours of deliveries to the site. The scheme is not expected to

increase the number of deliveries in comparison to the existing situation and as such it is not considered appropriate to insist on such restrictions as a result of this application.

8.156 An Outline Construction Logistics Plan (CLP) has been submitted. It is proposed that all construction vehicles will stop within a purposely designated loading area on-site in the Paddock adjacent to the Junior School. The existing gate to the Paddock is proposed to be widened and a new egress gate created. The grass will be laid with an appropriate surface to allow vehicle access. Both traffic marshals and banksmen will be employed and will manage pedestrian and vehicular movement around the site. Deliveries are proposed to take place between 9:30am and 2:30pm. A commitment has been made to prevent multiple deliveries from stacking up outside the site.

8.157 The Council's Highways Team finds the details within the CLP acceptable. The Environmental Health Team initially requested further information with regard to control of noise and dust and in terms of security arrangements. This was subsequently provided and the Environmental Health Team find the information acceptable. TfL have also required additional information with regard to; the route taken by construction vehicles to gauge impact on the TLRN and surrounding borough highways, clarification on the number of construction workers due on site and parking for them (which should reflect the mode share set out in London Plan Policy T1), number of vehicle movements, loading position, site hoarding and traffic management. In light of TfL comments, as well as comments made by residents of Hollingsworth Road, an updated CLP will be requested by condition.

Environmental matters

Building Performance

8.158 All major development should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

8.159 The submitted Energy Strategy has been developed in line with the London Plan's energy hierarchy. The proposed development is currently predicting a 58% carbon dioxide emissions reduction over the target Part L 2021 of the Building Regulations (based on the approach, information, analysis, and contents reported in the GLA Guidance on preparing energy assessments), through the following measures:

Be Lean - Demand Reduction - Using less energy and utilising passive sustainable design measures (energy efficiency delivering up to a 15% for the non-domestic carbon improvement on the building regulations). Glazing will be used to optimise the control of solar gain and glazing areas optimised to increase the benefits from natural daylighting, therefore reducing the need for electric lighting and minimising heat loss from the buildings. Building fabric will achieve high thermal performance and the development will be designed to a high air tightness standard.

Be Clean - Heating infrastructure – An investigation using the London Heat Map was carried out to identify the existing and future district heating networks in the vicinity of

the site. The London Heat Map indicated that there are no existing or planned district heating networks in the vicinity of the site. The site is situated on the border of the heat network priority area, and it is unlikely that any future district heating connections will be considered.

With regard to this matter, the GLA have asked for further exploration of District Heat Network (DHN) potential and to futureproof for connection to future DHN via s106. In response, the Council's Energy Officer has commented that the location is one of very low heat demand density with significant green space surrounding it. It is therefore a very unsuitable area for any heat network development and there would be no low-carbon benefit in requiring the development to be 'ready to connect' to a future network.

Be Green - Utilising renewable energy or low carbon technologies where possible to further reduce carbon emissions (energy efficiency delivering a 42% improvement on the building regulations). The Energy Strategy assesses low and zero carbon technologies and concludes that Air Source Heat Pumps (ASHP) and Photovoltaic panels (PVs) are the most suitable renewable energy technology for the school. Photovoltaic panels (231no.) will be installed to the roof area supplying the building with electricity and the area has been maximised as far as possible to account for shading and plant equipment. The number of roof panels has been increased following GLA comments which required demonstration that renewable energy has been maximised including roof layouts showing extent of PV provision. The provision of these photovoltaic panels can be controlled by condition.

Be Seen - Monitor and record the actual energy and carbon performance of buildings in comparison to estimated design figures.

8.160 To achieve the zero-carbon standard, an off-set payment will be made for the outstanding regulated CO₂ emissions based on the zero-carbon shortfall payment off-set price of £95 per tonne x 30 years, amounting to £21,710. This will be secured by legal agreement, along with standard "Be Seen" clauses (requiring post-construction monitoring).

8.161 Overheating and Cooling – Policy 5.9 of the London Plan requires major developments to reduce potential overheating and reliance on air conditioning systems. Mechanical ventilation will utilise heat recovery in the winter and mid-season months to increase the delivery efficiency of heating. The proposal will not be serviced with full air conditioning, but will be provided with the adequate mechanical ventilation with peak temperature lopping to achieve thermal comfort which will be modelled and tested through dynamic thermal simulation. It is recommended that openable windows are provided in every classroom for natural ventilation. The incorporation of brise soleil's will reduce solar gain and the need for artificial cooling. Externally, the landscaping, with extensive tree planting will reduce any heat island effect and provide natural shading and cooling.

As requested by the GLA, an overheating analysis has been undertaken. The assessment uses dynamic thermal modelling software to estimate operative temperature and calculate predicted occupant comfort levels. The assessment demonstrates that the proposed development is almost fully compliant with the performance standards for the avoidance of an overheating risk. However, it is noted that 2 x office/support staff spaces are at risk of overheating and as such, mitigate is required to be provided

at the next design stage to demonstrate how the occupants can minimise the risk of overheating in the future. This shall be secured by condition.

- 8.162 London Plan Policy SI2 (F) requires applications that are referable to the Mayor of London, to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLC) and demonstrate action taken to reduce life-cycle carbon emissions. A Whole Life Carbon Statement has been submitted.
- 8.163 As originally submitted, the Whole Life Carbon Statement calculations found that the development did not perform within the GLA benchmarks and the applicant proposed to commit to further assessment during later stage design development in order to reduce the WLC of the development further by reviewing the proposed substructure and structural frame which have high concrete content and the required external works and landscaping.
- 8.164 In their Stage 1 comments, the GLA noted that the WLC assessment did not comply with London Plan Policy SI2 and detailed comments were provided to the applicant in relation to the divergencies from their requirements. Notably, the assessment method and some of the data used did not conform with guidance and acceptable sources, and further information was required with regard to several factors including the divergence from the WLC benchmark, WLC reductions and material types and quantities.
- 8.165 The applicant has produced an updated Whole Life Carbon Statement in response to the GLA's comments. New calculations and remodelling has been undertaken, as well as suggesting further actions to improve emissions. The updated data shows that the results fall within the GLA's WLC benchmarks, but the development does not perform within the GLA's aspirational benchmarks. As previously commented, the applicant proposes to commit to further assessment during later stage design development by reviewing the proposed substructure and structural frame which have high concrete content and the required external works and landscaping. This updated assessment has been passed onto the GLA who are expected to provide further review as part of their Stage 2 (London Mayor's decision-making stage).
- 8.166 As required by the GLA, a condition will be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.
- 8.167 London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. Policy SI7 requires applications that are referable to the Mayor of London, to promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement has been submitted.
- 8.168 In their Stage 1 comments, the GLA noted that the Circular Economy Statement as submitted initially with the application, referred to previous guidance and principles and that a revised statement was needed in line with current adopted London Plan Guidance. The applicant has responded to the GLA's comments and has undertaken a new assessment based on the current guidance.
- 8.169 The selected strategy is 'New Building' and 'Demolish and Recycle' whereby traditional demolition will be undertaken, with elements and materials processed into new elements, materials and objects for use on the site or on another site. Given the structural un-soundness of the existing building, refurbishment and repurpose are not feasible options.

- 8.170 In terms of the new building, the following principles have been addressed:
- The building is designed to have a long life on its current site
 - Parts of the proposed building can be disassembled and relocated elsewhere in the future
 - The new building design will be built for component reuse at end-of-life. The steel frame can be extracted and reused, tiles and floor finishes will be durable and remain in good condition or reuse, any concrete elements can be recycled.
 - The building and rooms within it will be suitably sized for adaptability and flexibility
- 8.171 The proposed development has been designed by incorporating key commitments to the circular economy, considering the life cycle of all elements:
- Demolition materials to be crushed and re-used on site where feasible;
 - Minimisation of water and energy use during construction through management procedures and monitoring; and in-use through low carbon design and specification of energy and water efficient equipment;
 - Optimising the concrete design to maximise recycled content, and to reduce required cement and water content;
 - Materials selected for longevity and durability as well as recoverability and recyclability at end of life;
 - Consideration of off-site prefabrication of a number of elements to reduce construction and material waste;
 - Efficient segregation of waste streams, both during construction and in-use, through site waste management plans, and operation waste management plans, with targets set to divert waste from landfill in line with policy;
 - The Operational Waste Management Plan has been updated to include community-led waste minimisation measures for school staff and students.
- 8.172 This amended assessment has been passed onto the GLA who are expected to provide further review as part of their Stage 2 (London Mayor's decision-making stage).
- 8.173 The GLA also require a condition to be secured requiring the applicant to submit a post-construction report.

Contaminated Land

- 8.174 Anecdotal evidence suggested that the area to the west of the site comprised landfill material deposited during the 1960s. Given the history of the site, a detailed Ground Investigation Report has been undertaken. This has been assessed by the Council's Environmental Consultants. The consultant is satisfied with the desk study and the subsequent intrusive site investigation that has been undertaken. As the investigation found the presence of potential pollutant linkages, a remediation strategy is required to ensure that the site is rendered suitable for its use. This will be required by condition.

Flood Risk and sustainable drainage

- 8.175 The site is largely at low risk of surface water flooding, however there are areas around the junior school (including the area where the new building is proposed) that are at 1 in 1000 year risk. The site has limited potential for ground water flooding to occur.

- 8.176 Local Plan Policy DM25 and London Plan Policy SI 13 both require sustainable drainage systems to be used in all development. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.
- 8.177 A Flood Risk Assessment and SuDS Strategy Report has been submitted. The site is underlain by sand and gravel with ground investigations confirming that surface water run-off can be disposed of to the ground via infiltration.
- 8.178 Surface water will therefore drain directly to the ground utilising permeable paving (pedestrian paving, play surfaces and MUGA), rain gardens and filter drains. The building will be primarily drained via a soakaway located in the playground area. There are also opportunities for rainwater harvesting however this is not proposed to be used for attenuation.
- 8.179 The rain gardens are incorporated into the landscape strategy and have been designed to protect buildings and learning spaces by slowing down and managing rainwater flows. These include dry rain gardens located either side of the early years building wing which will operate as play features including boulders and gravel gardens, and vegetated raingardens within play and outdoor classroom spaces. In addition, surfacing within the play spaces will be permeable.
- 8.180 The Lead Local Flood Authority has reviewed the submitted information. As originally submitted, whilst there was no objection to the principle of the proposed drainage measures, the submitted FRA strategy presented a general approach to surface water management, however some further technical information was required to fully demonstrate compliance with LLFA's flood risk criteria. The applicant subsequently submitted additional information and the LLFA have confirmed that they have no objection as the application now meets most of the LLFA requirements, however some clarifications and additional information are still required to demonstrate that the proposals are fully compliant. These can be required by the inclusion of a pre-commencement condition.
- 8.181 The GLA Stage 1 report made comments on the submitted Flood Risk Assessment and SuDS Strategy Report, noting that further information was required in respect of several aspects (e.g. clarification on site area, risk of flooding from all sources, the use of rainwater harvesting, and requirement for further information on the below ground drainage layout). The applicant has submitted an amended report and response to the GLA's water memo. Officers are satisfied that the applicant has adequately addressed the GLA comments. The GLA will undertake further assessment as part of their Stage 2.
- 8.182 Given that the LLFA finds the information acceptable, no objection is raised in terms of the proposed drainage strategy, subject to the imposition of a condition.

Air Quality

- 8.183 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). London Plan Policy SI 1 and Local Plan Policy DM23 states that

development should seek opportunities to identify and delivery improvements to air quality. Development proposals must be Air Quality Neutral.

- 8.184 An Air Quality Assessment has been submitted. Potential impacts during the construction phase have been identified (e.g. release of dust and particulate matter) and this will be managed through good site practice and mitigation. The resultant impacts are this considered to be negligible.
- 8.185 Road dispersion modelling had been carried out to assess the suitability of the site for its proposed end use with regard to local air quality. The results indicate that predicted concentrations of relevant pollutants are well below relevant objectives. Future users would not be exposed to pollutant concentrations above objective levels and therefore the impact with regards to new exposure to air quality is therefore considered to be negligible.
- 8.186 The Environmental Health team advises that the development should follow the recommendations and mitigation measures within the Air Quality Assessment. This will be secured by condition.
- 8.187 The GLA Stage 1 has requested further information on Non-Road Mobile Machinery (NRMM). The applicant has commented that details of NRMM will not be fully known until a contractor is appointed. The Construction Logistics Plan condition will require details demonstrating compliance with the NRMM regulations 2015 to be submitted and approved. The GLA has also asked for confirmation as to whether the development has emergency generators, and if so, details of any emissions from this source should be screened and assessed if necessary. The applicant has confirmed that no emergency generators are proposed.

Noise

- 8.188 London Plan Policy D13 Agent of Change requires developments to be designed in a way that mitigates and minimises existing and potential nuisances such as noise early in the design stage. Policy D14 requires proposed to manage noise so as to avoid significant adverse noise impacts on health and quality of life. This is mirrored in Policies SP6 and DM23 of the Local Plan.
- 8.189 The application is for a replacement junior school on the same site without any significant increase in the number of users of the site. There are no adjoining occupiers who would be sensitive to noise disturbance. A baseline noise survey was undertaken to inform the design process and it has been found that natural ventilation can be achieved (e.g. opening windows) without being affected by noise concerns and external amenity areas will achieve suitable noise levels. Plant equipment may require attenuation which will be fully addressed at further design stage when specific plant items have been selected. The Environmental Health team raises no concerns in this regard.
- 8.190 The applicant should observe the Council's Code of Practice 'Control of Pollution and Noise from Demolition and Construction Sites' which shall be added as an informative to any permission granted.

Light pollution

- 8.191 An External Lighting Assessment has been undertaken. This outlines specific design criteria that needs to be achieved in the design of external lighting including for roads,

student walkways/footpaths and the MUGA. The development will be lit by lampposts (of a luminance and distribution to ensure student safety) and footpaths will also be lit with low level bollards. The MUGA will be lit by LED floodlights on 12m high poles to ensure uniformity and reduce shadowing.

- 8.192 The External Lighting Assessment has also assessed biodiversity design considerations. This includes; avoiding lamps that emit high levels of UV, the luminaries will comprise integral reflectors, louvres, diffusers to control direction and spread of light, there will be minimal spread of upward light, low level bollards will prevent the formation of a 'light barrier'. Full details of external lighting to ensure there is no harm to wildlife shall be secured by condition.

Other planning matters

Fire safety

- 8.193 As required by London Plan Policy D12, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. A Planning Fire Statement has been submitted. The statement includes details with regard to the structure of the building. A means of escape and evacuation strategy is provided and the building includes an evacuation lift. Details of the excavation assembly point are provided. The statement outlines passive and active fire safety measures. It also details means of access for the fire appliances.

- 8.194 The GLA is satisfied that the statement meets the requirements of Policy D12 and Policy D5 of the London Plan (2021). The Council's Building Control team have reviewed the submitted information and find the details satisfactory. A condition shall be imposed to ensure compliance with the submitted information.

Crime Prevention

- 8.195 The NPPF, London and Local Plan Policies seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. The applicant met with the Met Police Designing Out Crime Officer (DOCO) in advance of submission of the application whereby security measures were discussed and recommendations made, which mainly consist of internal security measures which will be incorporated through the detailed design stages of the construction. The DOCO has requested that the standard secured by design condition is imposed on any permission. The condition will make sure that the school is developed into a safe and secure environment for the children and staff.

Health Impact

- 8.196 London Plan Policy GG3 seeks to improve Londoner's health and reduce health inequalities and Croydon Local Plan Policy DM16 promotes the creation of healthy communities which encourage healthy behaviors and lifestyles. The applicant has submitted a Healthy Urban Planning Checklist.
- 8.197 The proposal will greatly improve existing teaching facilities and result in an increase in school places within the borough. The proposals will also improve the community use offering from the School, for example through use of the new Multi

Use Games Area, playing pitch and indoor facilities. The replacement School will be fully accessible for those with mobility issues.

- 8.198 The new building will be more energy efficient than the existing buildings on site and will utilise renewable energy technologies. Passive cooling techniques will be incorporated. The development will result in far better-quality open space for the pupils, greatly increased urban greening and biodiversity net gain. Sustainable drainage techniques will be used.
- 8.199 Active travel will be promoted through the school Travel Plan.
- 8.200 Construction impacts to health (e.g. dust, noise) will be minimised and managed through the Construction logistics Plan. A contribution towards local employment and training for the construction will be secured by S106 legal agreement.
- 8.201 Officers are satisfied that the proposal meets the requirements of the above-mentioned policies, by promoting healthy communities as far as possible.

Employment and training

- 8.202 As required by SP3.14 of the Croydon Local Plan and E11 of the London Plan, developers will be required to produce a Local Employment and Training Strategy (LETS) for the Construction Phase and/or End-use Phase as appropriate, outlining the approach they will take to delivering employment, training and apprenticeship outcomes and engagement with schools and education providers for the development.
- 8.203 In order to ensure that the benefits of the proposed development reach local residents who may be impacted directly or indirectly by the proposal's impacts, a skills, training and employment strategy (construction phase) will be secured through the S106 legal agreement. The legal agreement will secure contributions of £2,500 for each million pound or part thereof of the construction costs.

Conclusions

- 8.204 Whilst the development is deemed to constitute inappropriate development in the Metropolitan Green Belt, the applicant has demonstrated very special circumstances to enable officers to conclude that the development would not have any adverse impact on the openness of the Metropolitan Green Belt.
- 8.205 The scheme has been reduced in scale and significantly amended via the pre-application process to ensure that the layout, massing and design all respond positively to the local environment. The more compact form of the building in comparison to the existing allows extensive tree and landscape planting to be provided, the proposal well exceeding urban greening factor and net biodiversity gain targets.
- 8.206 The proposal has been designed to meet the functional needs of the school, providing high quality inside and outside learning facilities. There would be no adverse impact on existing sports facilities. There would be no adverse impact on any neighbouring residential property in terms of loss of light, privacy, outlook or noise disturbance.
- 8.207 Existing access and parking provision will not be affected by the proposed works. The existing access/highways issue that has been raised relating to Hollingsworth Road is an existing situation which will not be significantly additionally impacted by the current

proposal. Sustainable travel improvements will be facilitated through the School Travel Plan.

8.208 The development will meet energy performance targets. The proposal will cause no air or noise quality concerns. Sustainable drainage systems are proposed that meet with Lead Local Flood Authority requirements.

8.209 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).

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Appendix A

Community Use

Since its foundation in 1853, Royal Russell School has been committed to public benefit, including the ability for local and national communities to utilise the School's facilities and skills of its staff to the greater public benefit. The proposed development for a replacement building for the Junior School will benefit the wider community as the School shares its facilities with other local schools, sports clubs, and community groups as widely as possible, a practice that will continue with the new development. The majority of the community use that the School currently offers spans across the Royal Russell School as a whole, the construction of the replacement Junior School will allow for additional and improved facilities and more space to become available for use by existing and new community partners.

The below sets out the current community use of the Junior School specifically, followed by use of the wider School as a whole. The tables at the end set out when existing users currently use the School and how they will have the opportunity to make use of the new facilities, and what the replacement Junior School will offer.

Existing community use at the Junior School specifically

Through working with the Rowdown Foundation, the Junior School provides its facilities for use by pupils of other schools in the local area, specifically for those pupils who have the drive and ability to expand their learning beyond the normal curriculum, with teachers from the Junior School providing specific teaching and learning expertise to those children, many of whom are then accepted into Royal Russell and other local independent schools on life changing bursaries and scholarships. The Rowdown Foundation is a registered charity that provides the opportunity for gifted and talented pupils at school in New Addington to pursue an area of talent to further their ambition and eventually give them life-enhancing opportunities as they become young adults. The majority of children living in New Addington are either officially disadvantaged (i.e. they have or do qualify for free school meals) or come from low income families.

Royal Russell School provides a base for the Rowdown Foundation Tuition Programme by providing Masterclasses to groups of 20 Year 4 pupils from New Addington schools, with teachers from Royal Russell enthusiastically supporting the Rowdown aims for wider social mobility. Royal Russell is the closest independent school to New Addington and will expand the provision for the Rowdown Foundation Tuition Programme

with the new Junior School to provide wider support to the New Addington primary schools. Royal Russell School also provides a language teacher to Rowdown Primary School to provide an extra learning opportunity for the children and, in return, Rowdown has provided a place for a Royal Russell trainee teacher to increase their experience of the local community. Royal Russell has also recently offered a Sports Taster Day, giving 60 New Addington children an opportunity to experience sports they might otherwise not have played, with this opportunity to be offered more widely with the new Junior School buildings and new sports facilities.

Existing community use at the wider Royal Russell School

One important aspect is providing space for groups to gather, such as the Croydon Neighbourhood Watch group, the Croydon Performing Arts Festival (CPAF), Croydon Youth Organisations in Uniform and Croydon Scouting. In addition to providing spaces for community organisation, Royal Russell provides use of the grounds for fundraising events such as Restless Development's annual Restless Triathlon, which this year raised over £98,000 to help young people around the world to impact change in their own region.

The School has a long-standing partnership with a local state secondary school, Coloma Convent School, with a partnership Combined Cadet Force (CCF) of Coloma and Royal Russell students. This organisation is funded by the Ministry of Defence with the buildings, staff and equipment provided by the Royal Russell School for the benefit of all members of the contingent. This organisation is led by a long-standing member of the Royal Russell staff.

Royal Russell School also supports the Volunteer Police Cadets who parade at the School, making use of the grounds, swimming pool and other facilities. Allied to this, the British Transport Police (BTP) and Metropolitan Police regularly use the School grounds and site to train their K9 police dogs and handlers, alongside specialist teams from the BTP who make use of the School grounds to train their specialist extraction teams.

Shared use of facilities during holidays and outside school hours: the School supports the provision of activity clubs for local children during all School holidays by allowing use of its non-boarding facilities by other organisations. The School regularly hosts the Croydon Performing Arts Festival (CPAF)

Appendix A
Community Use

Royal Russell Replacement Junior School
August 2023

and has supported the regional heats of the Rotary Club Public Speaking competition and as a venue for a British Heart Foundation sponsored swim.

The School's sports facilities are used for Croydon Schools' Netball and Croydon Schools' Athletics Championships. As part of its commitment to the local community the School continues to sponsor and support the Guardian's Croydon Champions, a community-based awards scheme.

The School provides a venue for numerous local clubs and societies to meet and participate in a wide range of sporting and other activities. The School's Director of Music holds Music Workshops for children from 15 local schools and the Mathematics Department runs an annual Maths Challenge event involving over 100 pupils from twenty schools. In addition, the School's meeting facilities are utilised by the Army Engagement and by the Croydon branch of the Neighbourhood Watch.

The British Army has been provided the School's facilities to undertake it's Army Cadet Commissioning Board, an event that will be able to directly utilise the current buildings and new Junior School. Local Army units have also used (and will continue to use) the School's facilities, including the swimming pool to train and undertake mandatory tests.

200 students each week (over six weeks) attend a language course in the summer, totalling 1,200 students.

Shared Use of Swimming Pool: the swimming pool is used by local schools for swimming tuition, and it is available for community use through a membership scheme, with approximately 150 members at present. The pool is also used for pool parties at weekends. The swimming pool is used by more than 15 local state and independent primary schools.

'Mother and Baby' and Pre-school swimming sessions are held at lunchtimes four days a week. On Saturdays during term times approximately 220 young children attend swimming classes. Local members have daily sessions available throughout the year.

Shared use of sports pitches and sports hall: many local clubs use the Sports Hall, and the School has developed close ties with Addiscombe Hockey Club to share the use of the new astro turf hockey pitch and Multi Use Games Area.

- During the school year the School hosts the following tournaments and competitions:
 - U13 and U15 Croydon Schools Tennis Tournament
 - U13 Boys and Girls Surrey Hockey tournaments
 - U11 Croydon Football League Cup finals
 - U11 Croydon Small Schools' Cup finals
 - U11 Croydon Schools' Open Cup Final
 - U11 Croydon Schools' Netball Tournament Prelim round
 - U11 Croydon School's Indoor Athletics Prelim and Finals
 - U11 Croydon Schools' Mixed Rounders Prelim and finals
 - U11, U12, U13, U14 Boys and U12 Girls Croydon Schools' Indoor five-a-side football tournaments

The following table shows the current and anticipated usage of the School once the new Junior School is open for use.

Event/Organisation	Current use and / or new use in new building	Frequency	How new Junior School will be used
Combined Cadet Force	Currently use existing building and will use new building	Weekly during term time and school holiday, they meet on a Monday evening	Yes – use of improved classroom and teaching facilities, gathering spaces and the MUGA
Police Cadets & BTP	Currently use existing building and will use new building	Weekly (e.g. during term time and school holidays on Tuesday evenings)	Yes – use of improved classroom and teaching facilities, gathering spaces and the MUGA
Rowdown Foundation	Currently use existing building and will use new building	Weekly – students taught by RR teachers	Yes – use of improved classroom and teaching facilities, gathering spaces and the MUGA

Appendix A
Community Use

Royal Russell Replacement Junior School
August 2023

Surrey County Cricket Club	Currently use existing building and will use new building	Monthly – Surrey County Cricket Club and RR in discussion now about more and wider use of the facilities	Yes – use of the MUGA and playing pitch
Addiscombe Hockey Club	Currently use existing building and will use new building	Weekly	Yes – use of the MUGA and playing pitch
British Army (Regular Forces)	Currently use existing building and will use new building	The British Army use the School site for community outreach programmes and interaction with the Local Authority and GLA at least termly	Yes
RAF – Air Cadets	Currently use existing building and will use new building	Termly	Yes
YOU – Youth Organisations in Uniform	Currently use existing building and will use new building	Termly	Yes
Croydon NHS Trust	Currently use existing building and will use new building	Termly	Yes - use of improved classroom and teaching facilities and gathering spaces
Croydon Dalcroze Society	Currently use existing building and will use new building	Monthly	Yes – use of the gym
'Beyond the Court' – Met Police and England Netball	Currently use existing building and will use new building	Monthly	Yes – use of the gym and MUGA
Croydon Neighbourhood Watch	Currently use existing building and will use new building	Annually	Yes – use of improved meeting spaces
Croydon Korfball	Do not use existing building but will be able to use new building	Weekly	Yes – use of the gym
Shotokan Karate	Do not use existing building but will be able to use new building	Weekly	Yes – use of the gym
BKK Karate	Do not use existing building but will be able to use new building	Weekly	Yes – use of the gym
Rock Steady Trampoline Club	Do not use existing building but will be able to use new building	Weekly	Yes - the trampoline society will make use of the new building for events and competitions.

The School is committed to continuing to provide all its facilities to the greater public benefit, and with the opening of the new Junior School the ability for current and new users to make use of the School will become even broader – as set out in the table above. The new Junior School will have a MUGA (Multi-use Games Area) and an indoor gymnasium, as well as the sports pitch (7v7), all of which will be made available to the wider community. The facilities that will be made available for community use, as well as example times etc. is set out in the table below.

The new and improved Junior School will have greater facilities than the present, which will allow Royal Russell School to further support the work of the Rowdown Foundation through greater community outreach to local primary schools, specifically in the New Addington area of Croydon.

will enable the School to provide a greater range of community use facilities, over and above what is currently offered. Royal Russell School identifies as a 'whole school' and therefore the replacement of the old Junior School with the new building will allow the School to continue to offer the range of community use activities as described here.

Facility	How and when this will be made available	Example users
Multi Use Games Area	Made available throughout the whole calendar year after 7pm and through the weekend.	Sports clubs, Holiday Clubs
Gymnasium	Made available throughout the whole calendar year after 7pm and through the weekend.	Sport clubs, Community groups.
Sport Pitch	Made available throughout the whole calendar year after 7pm and through the weekend.	Sport clubs, Outdoor training
Classrooms Music practice rooms Drama space Art and Design	Made available throughout the whole calendar year after 7pm and through the weekend.	Rowdown foundation, other local primary schools and performing arts societies.

Royal Russell School remains committed to supporting its own pupils and the local community once the new Junior School is built, including the existing and new activities as detailed in this report. The addition of the new Junior School will specifically add more space, both teaching and sports, which

Planning Applications for Decision

Appendix B – Drawing Numbers and submitted Documents

Item 2

1 APPLICATION

Ref: 23/03175/FUL
Location: Royal Russell School, Coombe Lane, Croydon, CR9 5BX
Ward: South Croydon
Description: Demolition of existing Junior School. Erection of replacement Junior School including Multi-Use Games Area, sports pitch, play and landscaped areas, access and plant, and other associated works.

2 DRAWING NUMBERS

3113-JWA-ZZ-ZZ-DR-A-0001 Rev P02 (Site Location Plan)
3113-JWA-ZZ-ZZ-DR-A-0002 Rev P02 (Existing Site Plan)
3113-JWA-ZZ-ZZ-DR-A-0003 Rev P04 (Proposed Site Plan)
3113-JWA-ZZ-ZZ-DR-A-0004 Rev P01 (Demolition/Phasing Plan)
3113-JWA-ZZ-ZZ-DR-A-3020 Rev P02 (Existing Elevations Sheet 1/2)
3113-JWA-ZZ-ZZ-DR-A-3021 Re P02 (Existing Elevations Sheet 2/2)
3113-JWA-ZZ-00-DR-A-1020 Rev P02 (Existing Ground Floor Plan)
3113-JWA-ZZ-01-DR-A-1021 Rev P02 (Existing First Floor Plan)
3113-JWA-ZZ-02-DR-A-1022 Rev P02 (Existing Second Floor Plan)
3113-JWA-ZZ-L0-DR-A-1000 Rev P04 (Proposed Lower Ground Floor Plan)
3113-JWA-ZZ-00-DR-A-1001 Rev P04 (Proposed Ground Floor Plan)
3113-JWA-ZZ-01-DR-A-1002 Rev P04 (Proposed First Floor Plan)
3113-JWA-ZZ-RF-DR-A-1003 Rev P04 (Proposed Roof Plan)
3113-JWA-ZZ-ZZ-DR-A-3001 Rev P02 (Proposed Elevations South-East and South-West)
3113-JWA-ZZ-ZZ-DR-A-3002 Rev P02 (Proposed Elevations North-East and North-West)
3113-JWA-ZZ-ZZ-DR-A-4001 Rev P02 (Proposed Sections)
30152/8001 Rev P01 (Site sections Sheet 1 of 2)
30152/8002 Rev P01 (Site sections Sheet 2 of 2)
5532-OOB-ZZ-00-DR-L-0001 Rev P10 (Proposed Site Plan)
5532-OOB-ZZ-00-DR-L-0002 Rev P02 (Existing site and contours)
5532-OOB-ZZ-00-DR-L-0010 Rev P08 (Existing and proposed contours)
5532-OOB-ZZ-00-DR-L-0020 Rev P07 (Circulation Strategy)
5532-OOB-ZZ-00-DR-L-0021 Rev P06 (Proposed MUGA and playing field)
5532-OOB-ZZ-00-DR-L-0022 P06 (Existing paddock)
5532-OOB-ZZ-00-DR-L-0030 Rev P09 (Planting Strategy)
5532-OOB-ZZ-ZZ-DR-L-0040 Rev P03 (Site sections)
5532-OOB-ZZ-00-DR-L-0060 Rev P07 (Urban Greening Factor)
3113-JWA-MB-ZZ-D-A-8200 Rev P01 (Construction details external wall types)

3 SUBMITTED DOCUMENTS

- Air Quality Assessment by Entran Environmental and Transportation, dated 08-08-2023
- Arboricultural Report Revision 1: Tree Survey, Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, by AFA Consulting, dated 16th August 2023
- Biodiversity Net Gain Assessment by LUC, dated August 2023
- Circular Economy Statement by SOL Environmental, Reference SOL_23_S057_DES, Issue 2 dated 13th November 2023.
- Delivery and Servicing Plan TTP Consulting, dated October 2023
- Design and Access Statement by Jestico and Whiles, dated 4 August 2023
- Ecological Appraisal by LUC, dated October 2023
- Energy and Sustainability Statement Issue No.P04 by Desco, dated 14th August 2023
- External Lighting Assessment Led Scheme Issue No.02 by Desco, dated August 2023
- Flood Risk Assessment and SuDS Strategy Report Rev.03 by Price & Myers, dated October 2023
- GLA Energy Strategy Issue No.P05 by Desco, dated 25th October 2023
- Ground Investigation Report by Johnson, Poole & Bloomer Consultants, dated July 2022
- Healthy Urban Planning Checklist
- Historic Environment Assessment by LUC, dated August 2023
- Liangspan Re-Inspection Ref G26029 RP 001 by Perega, dated 25th November 2021
- Operational Waste Management Plan by TTP Consulting, dated November 2023
- Outline Construction Logistics Plan by TTP Consulting, dated July 2023
- Planning Fire Statement by The Fire Surgery, document ref. 230804DN0F1, dated 04/08/2023
- Planning Statement by LUC, dated August 2023
- Pre-Demolition Audit by Erith, dated 28/07/2023
- School Travel Plan by TTP Consulting, dated July 2023 NB
- Sustainability Statement by SOL Environmental, dated July 2023
- Thermal Comfort CIBSE TM52 Overheating Analysis by Desco, dated 3rd August 2023
- Transport Statement by TTP Consulting, dated July 2023
- Whole Life Carbon Statement by SOL Environmental, Reference SOL_23_S057_DES , issue 2 dated 13th November 2023
- Supplementary Transport Information by TTP Consulting, dated October 2023
- Transport Note by TTP Consulting, dated October 2023
- CLP Supplementary Information by TTP Consulting, dated October 2023
- Documentation of the component thermal transmittance (U-value), dated September 2023

PLANNING COMMITTEE AGENDA

PART 8: Other Planning Matters

1 INTRODUCTION

- 1.1 In this part of the agenda are reports on planning matters, other than planning applications for determination by the Committee and development presentations.
- 1.2 Although the reports are set out in a particular order on the agenda, the Chair may reorder the agenda on the night. Therefore, if you wish to be present for a particular application, you need to be at the meeting from the beginning.
- 1.3 The following information and advice applies to all those reports.

2 FURTHER INFORMATION

- 2.1 Members are informed that any relevant material received since the publication of this part of the agenda, concerning items on it, will be reported to the Committee in an Addendum Update Report.

3 PUBLIC SPEAKING

- 3.1 The Council's constitution only provides for public speaking rights for those applications being reported to Committee in the "Planning Applications for Decision" part of the agenda. Therefore reports on this part of the agenda do not attract public speaking rights.

4 BACKGROUND DOCUMENTS

- 4.1 For further information about the background papers used in the drafting of the reports in part 7 contact Mr P Mills (020 8760 5419).

5 RECOMMENDATION

- 5.1 The Committee to take any decisions recommended in the attached reports.

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Sustainable Communities, Regeneration and Economic Recovery Department
DEVELOPMENT MANAGEMENT

DELEGATED PLANNING DECISIONS (Ward Order)

The following is a list of planning applications determined by the Head of Development Management under delegated powers since the last meeting of the Planning Committee.

30.10.2023 to 10.11.2023

Note: This list also includes those decisions made by Planning Committee and released in this time frame as shown within the level part of each case.

NOTE: The cases listed in this report can be viewed on the Council's Website.

Please note that you can also view the information supplied within this list and see more details relating to each application (including the ability to view the drawings submitted and the decision notice) by visiting our Online Planning Service at the Croydon Council web site (www.croydon.gov.uk/onlineplans).

Once on the Council web page please note the further information provided before selecting the Public Access Planning Register link. Once selected there will be various options to select the Registers of recently received or decided applications. Also; by entering a reference number if known you are able to ascertain details relating to a particular application. (Please remember to input the reference number in full by inserting any necessary /'s or 0's)

Ref. No. :	22/04274/ADV	Ward :	Addiscombe East
Location :	Outside 305 Lower Addiscombe Road Croydon CR0 6AA	Type:	Consent to display advertisements
Proposal :	Advertising as part of a new bus shelter		

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : First Floor Flat
12 Everton Road
Croydon
CR0 6LA
Type: Full planning permission

Proposal : Erection of dormer roof extension in rear roof slope and Installation of two (2) roof lights in the front roof slope

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 22/04279/ADV
Location : Bus Shelter 085 Outside 73
Morland Road
Croydon
CR0 6HA
Ward : **Addiscombe West**
Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/02987/FUL
Location : Easy Hotel
22 Addiscombe Road
Croydon
CR0 5PE
Ward : **Addiscombe West**
Type: Full planning permission

Proposal : Installation of additional plant and x3 air to water heat pumps and associated works at ground floor level. Installation of additional plant and associated screening, PV panels, AHU unit and alterations at rooftop level.

Date Decision: 02.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03284/FUL
Location : 50 Hastings Road
Croydon
CR9 6BR
Ward : **Addiscombe West**
Type: Full planning permission

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Erection of a replacement single storey outbuilding to the front of the site for continued use as a kitchen/canteen.

Date Decision: 03.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03507/FUL
Location : 29 Alexandra Road
Croydon
CR0 6EY

Ward : Addiscombe West
Type: Full planning permission

Proposal : Partial demolition of rear outrigger roof enlargement. Erection of single storey side and rear extension to outrigger. Conversion of the resulting building to provide 3 flats with associated amenity space, cycle and refuse storage.

Date Decision: 08.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03720/CAT
Location : Flat 2
66A Clyde Road
Croydon
CR0 6SW

Ward : Addiscombe West
Type: Works to Trees in a Conservation Area

Proposal : T1 horse Chestnut tree fell
T2 horse Chestnut tree fell
T3 horse Chestnut tree fell

Date Decision: 08.11.23

No objection (tree works in Con Areas)

Level: Delegated Business Meeting

Ref. No. : 23/03737/TRE
Location : 36 St Clair's Road
Croydon
CR0 5NE

Ward : Addiscombe West
Type: Consent for works to protected trees

Proposal : T1 Oak Tree - Prune to previous points.
(TPO No. 26, 1969)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Ref. No. : 23/03395/GPDO **Ward : Bensham Manor**
Location : 143 Brigstock Road Type: Prior Appvl - up to two storeys
Thornton Heath flats
CR7 7JN

Proposal : Construction of one additional storey to provide three self-contained flats

Date Decision: 02.11.23

Approved (prior approvals only)

Level: Delegated Business Meeting

Ref. No. : 23/03534/LE **Ward : Bensham Manor**
Location : 51 Brigstock Road Type: LDC (Existing) Use edged
Thornton Heath
CR7 7JH

Proposal : Use of the building as seven (7) self-contained flats

Date Decision: 09.11.23

Lawful Dev. Cert. Granted (existing)

Level: Delegated Business Meeting

Ref. No. : 23/02759/HSE **Ward : Broad Green**
Location : 12 Kelvin Gardens Type: Householder Application
Croydon
CR0 4UR

Proposal : Erection of two-storey side extension. Roof extension and alteration to a hipped roof.

Date Decision: 31.10.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03659/GPDO **Ward : Broad Green**
Location : 286 Mitcham Road Type: Prior Appvl - Class A Larger
Croydon House Extns
CR0 3JN

Proposal : Erection of a single storey rear extension projecting out 4 metres from the rear wall of the original house with a height to the eaves of 3 metres and a maximum height of 3.35 metres

Date Decision: 09.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Ref. No. : 23/03830/NMA
Location : Zodiac House
161 - 165 London Road
Croydon
CR0 2RJ

Ward : **Broad Green**
Type: Non-material amendment

Proposal : Non-material amendment (replacement of compliance document in condition 10) linked to planning application 22/02573/FUL for the Part change of use from office (E(g)) and nightclub (sui generis) to residential (C3) to create 5no. apartments, and the demolition of external structures, formation of entrance ramp and stairs, alterations to elevations and associated works, approved 25.10.2022.

Date Decision: 07.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/01379/FUL
Location : Sainsbury's Superstore
66 Westow Street
Upper Norwood
London
SE19 3RW

Ward : **Crystal Palace And Upper Norwood**
Type: Full planning permission

Proposal : Installation of plant and associated equipment on roof and RIHC plant in service yard with associated works

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/02261/HSE
Location : 1 Tree View Close
Upper Norwood
London
SE19 2QT

Ward : **Crystal Palace And Upper Norwood**
Type: Householder Application

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Alterations relating to planning permission 22/01596/HSE, including: proposed AC unit, fenestration changes, erection of timber pergola and all associated works. (retrospective).

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/02693/HSE **Ward : Crystal Palace And Upper Norwood**

Location : 203 South Norwood Hill
South Norwood
London
SE25 6DN
Type: Householder Application

Proposal : Erection of a glazed canopy with retractable awning to the rear.

Date Decision: 07.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03176/DISC **Ward : Crystal Palace And Upper Norwood**

Location : Land Between 137-181 Church Road
Upper Norwood
London
SE19 2PR
Type: Discharge of Conditions

Proposal : Discharge of Conditions 3 and 5 (landscaping) attached to planning permission 17/03010/FUL for Erection of part single/two storey building comprising 2 two bedroom flats, provision of associated cycle and refuse storage and landscaping

Date Decision: 01.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03502/HSE **Ward : Crystal Palace And Upper Norwood**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Groombridge
3 Woodfield Close
Upper Norwood
London
SE19 3EN

Type: Householder Application

Proposal : Erection of part one/two rear extensions (following demolition of existing conservatory).

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03779/CAT

Location : 7 Nesbitt Square
Upper Norwood
London
SE19 3AB

Ward : **Crystal Palace And Upper Norwood**

Type: Works to Trees in a Conservation Area

Proposal : T1 Cypress - Fell

Date Decision: 08.11.23

No objection (tree works in Con Areas)

Level: Delegated Business Meeting

Ref. No. : 23/03108/DISC

Location : 22 Gidd Hill
Coulston
CR5 3AH

Ward : **Coulston Town**

Type: Discharge of Conditions

Proposal : Discharge of conditions 4 (Landscaping details) and 11 (private amenity and landscape strategy) attached to planning application 19/05568/FUL for 'Demolition of garages, erection of two semidetached dwellings with vehicular access, car parking, cycle and refuse storage'.

Date Decision: 01.11.23

Approved

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Ref. No. : 23/03266/HSE **Ward : Coulsdon Town**
Location : 398 Chipstead Valley Road **Type: Householder Application**
Coulsdon
CR5 3BJ

Proposal : Erection of first floor rear extension and alteration.

Date Decision: 30.10.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03299/HSE **Ward : Coulsdon Town**
Location : 85 St Andrews Road **Type: Householder Application**
Coulsdon
CR5 3HG

Proposal : Erection of a single storey side extension.

Date Decision: 07.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03464/HSE **Ward : Coulsdon Town**
Location : 13 Melrose Road **Type: Householder Application**
Coulsdon
CR5 3JH

Proposal : Partial demolition and erection of single storey side/rear extension and garage conversion.

Date Decision: 03.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03617/HSE **Ward : Coulsdon Town**
Location : 58 Woodcote Grove Road **Type: Householder Application**
Coulsdon
CR5 2AB

Proposal : Proposed rear dormer extension and external alterations and installation of rooflights to the front elevation.

Date Decision: 10.11.23

Permission Granted

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Outside Police Station
Park Lane
Croydon
CR0 1JD

Type: Consent to display advertisements

Proposal : Small format Advertising

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 22/04160/ADV

Location : J C Decaux Bus Shelter Outside Apollo
House
Wellesley Road
Croydon
CR0 2AJ

Ward : **Fairfield**

Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 22/04162/ADV

Location : Bus Shelter O/S 1052-1053 Whitgift Centre
Croydon
CR0 1UW

Ward : **Fairfield**

Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 22/04301/ADV

Location : Bus Shelter
70 High Street
Croydon
CR0 1NA

Ward : **Fairfield**

Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/02452/FUL **Ward : Fairfield**
Location : Premier House Type: Full planning permission
14C Sydenham Road
Croydon
CR0 2EZ

Proposal : Alterations to elevations to include the erection of new balconies on the first, second and third floors; repeating and extending the existing module of the upper levels to the Dingwall Road Elevation, and adding new projecting balconies along the Sydenham Road elevation.

Date Decision: 09.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/02513/HSE **Ward : Fairfield**
Location : 44 Wandle Road Type: Householder Application
Croydon
CR0 1DE

Proposal : Erection of a single storey rear infill extension

Date Decision: 01.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03171/FUL **Ward : Fairfield**
Location : 26 Dingwall Road Type: Full planning permission
Croydon
CR0 9XF

Proposal : Installation of signage to the front elevation and the installation of air condensing units (within protective cages) to the rear

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03172/ADV **Ward : Fairfield**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 26 Dingwall Road
Croydon
CR0 9XF
Type: Consent to display
advertisements

Proposal : Installation of illuminated signage including projecting sign, fascia, roundel and display
screen

Date Decision: 10.11.23

Consent Granted (Advertisement)

Level: Delegated Business Meeting

Ref. No. : 23/03410/HSE
Location : 54 Clarendon Road
Croydon
CR0 3SG
Ward : **Fairfield**
Type: Householder Application

Proposal : Erection of ground floor side/rear extension and first floor side/rear extension with
associated works

Date Decision: 01.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03550/LP
Location : 60 Clarendon Road
Croydon
CR0 3SG
Ward : **Fairfield**
Type: LDC (Proposed) Operations
edged

Proposal : Construction of roof extension and rear dormer with windows and internal alterations

Date Decision: 10.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03767/DISC
Location : Land Adjacent To Croydon College
College Road
Croydon, CR0 1PF
Ward : **Fairfield**
Type: Discharge of Conditions

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Part Discharge of condition 3 (CLP- hours of construction only) attached to planning permission 21/03856/CONR for the Variation of conditions 2 (approved plans) and 38 (parking facilities) imposed upon planning permission 19/04987/FUL (for redevelopment of the site to provide a part 49 storey and part 34 storey building with basements, comprising 817 co-living units (Use Class Sui Generis) within Tower A and 120 residential units (Use Class C3) within Tower B, a cafe (Use Class A3), community use (Use Class D1), associated communal facilities for co-living residents, amenity spaces, cycle parking, disabled parking spaces, refuse and cycle storage and associated landscaping and public realm works)

Date Decision: 01.11.23

Withdrawn application

Level: Delegated Business Meeting

Ref. No. : 23/04130/NMA

Ward : Fairfield

Location : Land Adjoining East Croydon Station, Bounded By George Street (Including 1-5 Station Approach), Dingwall Road, (Including The Warehouse Theatre), Lansdowne Road And Including Land To The North Of Lansdowne Road, Croydon

Type: Non-material amendment

Proposal : Non-material amendment to planning permission ref. 20/01503/CONR (The erection of five buildings with a minimum floor area of 53,880 sq metres and maximum of 62,080 sq metres to provide a minimum of 550 and a maximum of 625 residential units; erection of up to 6 buildings for class E(g)(i) use for a minimum of 88,855 sq metres and a maximum of 151, 420 sq metres; provision of a minimum of 7285 sq metres and a maximum of 10,900 sq metres of commercial, business and service (class E(a)-(d)), and pub and drinking establishments (including those with expanded food provision) and takeaways (class Sui Generis); provision of a maximum of 400 sq metres of community and learning use (classes E(e)-(f), F.1(a)-(e) and F.2(a)-(b); provision of a replacement theatre of 200 seats; provision of energy centre and estate management facilities; formation of vehicular accesses and provision of pedestrian routes public open space and car parking not to exceed 256 parking spaces) to amend the hostile vehicle mitigation outside the southern entrance to the building and the material finish adjacent to the north west entrance to the building.

Date Decision: 10.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/01970/HSE

Ward : Kenley

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 12 Hadley Wood Rise
Kenley
CR8 5LY
Type: Householder Application

Proposal : Erection of two storey side extension and internal / external alterations. Alterations to land levels and formation of retaining walls in rear garden.

Date Decision: 09.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/02493/CONR
Location : 46 Welcomes Road
Kenley
CR8 5HD
Ward : **Kenley**
Type: Removal of Condition

Proposal : Variation of Condition 4 (Approved Plans) attached to PP 20/06250/OUT (allowed under appeal APP/L5240/W/21/3279654) for 'The erection of a frontage block of six flats and a pair of semi-detached house; and the demolition of the existing detached bungalow'.

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03420/HSE
Location : 1 Cedar Walk
Kenley
CR8 5JL
Ward : **Kenley**
Type: Householder Application

Proposal : Alterations, erection of front porch, canopy, single-storey glazed infill to side and erection of single storey rear extension.

Date Decision: 09.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03576/DISC
Location : 1 Roke Road
Kenley
CR8 5NQ
Ward : **Kenley**
Type: Discharge of Conditions

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Discharge of Conditions 3 (Privacy screens / cycle & refuse stores / visibility splays / playspace) and 4 (Landscaping) attached to planning permission 18/05752/FUL for Demolition of the existing dwelling and erection of a two storey building comprising 1x two bedroom and 1x three bedroom flats. Provision of associated parking and amenity areas.

Date Decision: 07.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03671/TRE

Ward : Kenley

Location : 1 Frobisher Close
Kenley
CR8 5HF

Type: Consent for works to protected trees

Proposal : Ash T1: Fell due to Dieback
(TPO 26, 1973)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/03674/HSE

Ward : Kenley

Location : 12 Wattendon Road
Kenley
CR8 5LU

Type: Householder Application

Proposal : Proposed conversion and enlargement of existing garage at the rear of the property to form habitable area ancillary to main dwelling.

Date Decision: 07.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03695/TRE

Ward : Kenley

Location : 9 Cullisden Road
Kenley
CR8 5LR

Type: Consent for works to protected trees

Proposal : Silver Birch (T1) - Reduce back to previous pruning points.
Silver Birch (T2) - Reduce back to previous pruning points.
(TPO 100)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Level: Delegated Business Meeting

Ref. No. : 23/03727/TRE
Location : 6 Kenwood Ridge
Kenley
CR8 5JW

Ward : Kenley
Type: Consent for works to protected trees

Proposal : T1 - Ash: Fell due to Innonotus.
(TPO No. 31, 1986)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/04015/LP
Location : 13 Steyning Close
Kenley
CR8 5LP

Ward : Kenley
Type: LDC (Proposed) Operations edged

Proposal : Erection of covered seating area/canopy to rear

Date Decision: 07.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 22/04158/ADV
Location : Bus Shelter Opposite Calat New Addington
Centre
61 Central Parade
Croydon
CR0 0JD

Ward : New Addington South
Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Ref. No. : 23/03236/HSE **Ward : New Addington South**
Location : 60 Warbank Crescent **Type: Householder Application**
Croydon
CR0 0AS

Proposal : Erection of single storey detached outbuilding (retrospective)

Date Decision: 02.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 20/05699/FUL **Ward : Norbury Park**
Location : 165 Green Lane **Type: Full planning permission**
Norbury
London
SW16 3NA

Proposal : Conversion of two-storey dwellinghouse (Use Class C3) into five-bedroom, five-person small house in multiple occupation (Use Class C4) with associated amenity, cycle parking and waste storage spaces, Associated erection of single-storey rear extension and dormer extension to rear of main roofslope, and Alterations (Retrospective Application)

Date Decision: 10.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/02691/FUL **Ward : Norbury Park**
Location : Pavillion **Type: Full planning permission**
Biggin Wood
Upper Norwood
London
SE19 3HT

Proposal : Change of use of existing tennis court changing room building and courtyard to Day Nursery with external play areas.

Date Decision: 09.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/02963/HSE **Ward : Norbury Park**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 326 Norbury Avenue
Norbury
London
SW16 3RL
Type: Householder Application

Proposal : Conversion of garage to habitable space and erection of part single, part double storey side, side/front and rear extensions. Installation of 2x front facing rooflights.

Date Decision: 01.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/02966/FUL
Location : 2 Courtland Avenue
Norbury
London
SW16 3BB
Ward : **Norbury Park**
Type: Full planning permission

Proposal : Erection of a single-storey dwellinghouse (Use Class C3) with associated amenity, cycle parking and waste storage spaces (following demolition of existing single-storey outbuilding), and Associated alterations including landscaping

Date Decision: 03.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03407/OUT
Location : 110 Norbury Hill
Norbury
London
SW16 3RT
Ward : **Norbury Park**
Type: Outline planning permission

Proposal : Outline planning permission (with all matters reserved) for the demolition of existing bungalow and adjoining garage. Erection of 5 x terraced houses with associated access, parking, photovoltaic panels, landscaping, refuse and cycle stores.

Date Decision: 08.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03408/FUL
Ward : **Norbury Park**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 15 Kensington Avenue
Thornton Heath
CR7 8BT
Type: Full planning permission

Proposal : Conversion of two-storey dwellinghouse (Use Class C3) into twelve (12) child day nursery (Use Class E(f)), Associated cycle and waste stores, and Associated alterations

Date Decision: 01.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03457/OUT
Location : 110 Norbury Hill
Norbury
London
SW16 3RT
Ward : **Norbury Park**
Type: Outline planning permission

Proposal : Outline planning permission (with all matters reserved) for the demolition of existing bungalow and adjoining garage. Erection of 5 x terraced houses with associated access, parking, photovoltaic panels, landscaping, refuse and cycle stores..

Date Decision: 08.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03487/HSE
Location : 30 Hillcote Avenue
Norbury
London
SW16 3BH
Ward : **Norbury Park**
Type: Householder Application

Proposal : Erection of outbuilding in rear garden.

Date Decision: 10.11.23

Withdrawn application

Level: Delegated Business Meeting

Ref. No. : 23/03508/HSE
Location : 41 Kensington Avenue
Thornton Heath
CR7 8BT
Ward : **Norbury Park**
Type: Householder Application

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Alterations, erection of part-single/two-storey rear extension and front porch extension.

Date Decision: 07.11.23

Withdrawn application

Level: Delegated Business Meeting

Ref. No. : 23/03540/HSE
Location : 97 Northwood Road
Thornton Heath
CR7 8HW

Ward : Norbury Park
Type: Householder Application

Proposal : Erection of single storey rear infill extension.

Date Decision: 06.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03544/LP
Location : 47 Highbury Avenue
Thornton Heath
CR7 8BQ

Ward : Norbury Park
Type: LDC (Proposed) Operations
edged

Proposal : Erection of single storey outbuilding in rear garden.

Date Decision: 09.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03548/HSE
Location : 71 Virginia Road
Thornton Heath
CR7 8EN

Ward : Norbury Park
Type: Householder Application

Proposal : Conversion of garage to habitable room and associated alterations.

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Ref. No. : 23/03572/GPDO **Ward : Norbury Park**
Location : 86 Kensington Avenue **Type: Prior Appvl - Class A Larger**
Thornton Heath **House Extns**
CR7 8BZ

Proposal : Demolition of the existing conservatory and erection of a single storey rear extension projecting out 6.0m from the rear wall of the original house with an eaves height of 2.87m and a maximum height of 3.15m

Date Decision: 02.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Ref. No. : 23/03589/FUL **Ward : Norbury Park**
Location : Land At The Rear Of 212 Green Lane, (now **Type: Full planning permission**
Known As 206A)
Norbury
London
SW16 3BL

Proposal : Erection of a detached dwelling (previously approved under application ref: 18/01752/FUL) with white K-rendering instead of wood cladding and alteration to obscure glazed first floor window positioning in the north east elevation. Provision of refuse and cycle storage and associated landscaping (Part Retrospective).

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03640/GPDO **Ward : Norbury Park**
Location : 201 Green Lane **Type: Prior Appvl - Class A Larger**
Norbury **House Extns**
London
SW16 3LZ

Proposal : Erection of single storey rear extension projecting out 4 metres with a maximum height of 3.42 metres

Date Decision: 08.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Wheelwrights Cottage
Homefield Road
Coulsdon
CR5 1ES
Type: LDC (Proposed) Operations
edged

Proposal : Erection of a single storey side/rear extension attached to the dwelling (in the location of the existing open-sided car port)

Date Decision: 01.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03714/TRE
Location : St John The Evangelist Church
Canon's Hill
Coulsdon
CR5 1HA
Ward : Old Coulsdon
Type: Consent for works to protected
trees

Proposal : Yew: To reduce crown height by 4-5m, reduce crown radius by 1.5.
(TPO 03, 1969)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/03956/LP
Location : 28 Thornton Crescent
Coulsdon
CR5 1LH
Ward : Old Coulsdon
Type: LDC (Proposed) Operations
edged

Proposal : Alterations including conversion of the existing garage to a habitable room.

Date Decision: 02.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/02926/HSE
Ward : Park Hill And Whitgift

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 11 Fitzjames Avenue
Croydon
CR0 5DL
Type: Householder Application

Proposal : Erection of a first floor side extension on both sides of the property, roof alterations, rooflights and two dormers in the rear roof slope

Date Decision: 03.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03455/DISC
Location : Development Site At
114 Addiscombe Road
Croydon
CR0 5PQ
Ward : **Park Hill And Whitgift**
Type: Discharge of Conditions

Proposal : Details pursuant to Condition 9 Construction logistics Plan of planning permisison 19/05965/FUL granted for demolition of existing building and erection of two dwelling houses with off street parking.

Date Decision: 03.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 21/04421/ADV
Location : Bus Shelter Outside Downs Court
Brighton Road
Purley
CR8 2BJ
Ward : **Purley Oaks And Riddlesdown**
Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter.

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/01134/DISC
Ward : **Purley Oaks And Riddlesdown**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 33 Purley Downs Road
Purley
CR8 1HA
Type: Discharge of Conditions

Proposal : Discharge of condition 4 (landscaping) attached to planning permission 19/02276/FUL for the demolition of existing buildings on site and the redevelopment of the site to provide 267 sqm of commercial floorspace (B1/B8) and 37 residential units (13 x 1 beds, 18 x 2 beds and 6 x 3 beds), with associated landscaped areas including children's play space, parking, cycle store and refuse store.

Date Decision: 06.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03375/DISC
Ward : **Purley Oaks And Riddlesdown**

Location : Development Site Former Site Of
443A Brighton Road
South Croydon
CR2 6EU
Type: Discharge of Conditions

Proposal : Part Discharge of Condition 30 (Public Art) of 21/06181/CONR (Variation to conditions 2 (approved documents) and 12 (Carbon dioxide emissions as per the approved Energy Statement) attached to planning permission 20/02020/FUL (for Demolition of existing buildings and the redevelopment of the site to provide a residential led, mixed use, development comprising of up to 79 residential units (C3), 398 sqm GIA flexible commercial space (B1b, B1c and D1), with building heights ranging between 4, 6 and 8 storeys, associated parking and landscaping, and all necessary ancillary and enabling works).

Date Decision: 07.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03451/DISC
Ward : **Purley Oaks And Riddlesdown**

Location : 85 Purley Downs Road
South Croydon
CR2 0RJ
Type: Discharge of Conditions

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Discharge of condition 3 (external facing materials), 5 (landscaping), 6 (various matters), 7 (sound insulation), 8 (privacy screening), 18 (SUDs) attached to planning permission 22/03208/FUL for demolition of existing dwellinghouse and erection of a three storey building comprising 9 flats, alterations/widening of existing vehicular access, formation of access road, provision of associated parking, cycle parking, bin store and hard and soft landscaping

Date Decision: 03.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03759/TRE

Ward : Purley Oaks And Riddlesdown

Location : 5 Purley Bury Close
Purley
CR8 1HW

Type: Consent for works to protected trees

Proposal : G1, 7 X Sycamore - Repollard.
(TPO no. 92)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 22/04865/HSE

Ward : Purley And Woodcote

Location : 51 Woodside Road
Purley
CR8 4LQ

Type: Householder Application

Proposal : Retrospective application for the erection of basement, two storey front extension and single storey rear and side extension with two balconies and glass balustrades. Alterations to land level at the rear garden.

Date Decision: 03.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/02913/DISC

Ward : Purley And Woodcote

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Development Site Former Site Of Type: Discharge of Conditions
131 Woodcote Valley Road
Purley
CR8 3BN

Proposal : Discharge of condition 4 (materials and details) pursuant to application 20/04952/FUL dated 24/03/22 for the 'Demolition of existing dwelling and erection of a three storey building with roof accommodation comprising 8 flats with associated car parking, bike store, refuse store and landscaping.'

Date Decision: 09.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03139/DISC Ward : **Purley And Woodcote**
Location : 11 - 21 Banstead Road Type: Discharge of Conditions
Purley
CR8 3EB

Proposal : Application to discharge details relating to condition 9 (materials) of 21/02832/FUL Demolition of three pairs of semi-detached houses and the erection of six storey buildings to provide 67 residential units, together with new access and closure of existing accesses, provision of disabled parking and cycle parking, refuse storage, landscaping and improvements to the public realm on Banstead Road.

Date Decision: 10.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03205/DISC Ward : **Purley And Woodcote**
Location : Manderley Type: Discharge of Conditions
Hartley Hill
Purley
CR8 4EL

Proposal : Discharge of condition numbers 3 (Construction Logistics Plan) and 4 (Tree Protection) attached to planning permission ref. 21/04630/FUL. (Construction of a detached dwelling with off road parking and front and rear outside amenity spaces).

Date Decision: 10.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03472/FUL
Location : 99 Downlands Road
Purley
CR8 4JJ
Ward : Purley And Woodcote
Type: Full planning permission

Proposal : Erection of a first-floor extension to the existing bungalow with external and internal alterations to accommodate a conversion of the existing dwelling house to a pair of 3-bedroom semi-detached dwellings with associated car parking, cycle and refuse stores and private amenity spaces.

Date Decision: 01.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03475/HSE
Location : 49 Pampisford Road
Purley
CR8 2NJ
Ward : Purley And Woodcote
Type: Householder Application

Proposal : Erection of single/two storey side and rear extensions, alterations and extension to existing porch, loft conversion and installation of roof lights to the side, rear and on the flat roof, alteration to fenestration arrangement and to render the external walls.
(Amendments to 22/03784/HSE)

Date Decision: 06.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03482/DISC
Location : 11 - 21 Banstead Road
Purley
CR8 3EB
Ward : Purley And Woodcote
Type: Discharge of Conditions

Proposal : Discharge of condition 4(B) (Archaeological Evaluation Report) of 21/02832/FUL
Demolition of three pairs of semi-detached houses and the erection of six storey buildings to provide 67 residential units, together with new access and closure of existing accesses, provision of disabled parking and cycle parking, refuse storage, landscaping and improvements to the public realm on Banstead Road.

Date Decision: 31.10.23

Approved

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 38 Selcroft Road
Purley
CR8 1AD
Type: Consent for works to protected trees

Proposal : 1 x Oak - Reduce lateral crown spread growing over roof by 2.5m leaving 2.5m (to clear branches growing over solar panels)
(TPO 21, 1974)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/03738/CAT
Location : Woodlands
Farm Drive
Purley
CR8 3LP
Ward : **Purley And Woodcote**
Type: Works to Trees in a Conservation Area

Proposal : T27 - Liquid Amber - To reduce mature Liquid Amber in height by 2.5m and Cobra Brace the 2x stems together at 10m.
T26 - Purple Beech - To crown lift mature Beech tree located in the front garden to 4m on all sides.
T7 - Oak -To reduce lowest limb on the mature Oak located in the front garden by 1.0m.
T81 - Purple Beech - Crown lift the mature Purple Beech located in the rear garden to 3m measured from ground level.
T38 - Sycamore -To lift lowest limb on the mature Sycamore located by the compost area to give 3.0m ground clearance.
T43 - Sycamore - To reduce 2x lowest over extended limbs from the mature Sycamore located at the rear of the garden by 2.0m.

Date Decision: 08.11.23

No objection (tree works in Con Areas)

Level: Delegated Business Meeting

Ref. No. : 23/03746/DISC
Location : 11 - 21 Banstead Road
Purley
CR8 3EB
Ward : **Purley And Woodcote**
Type: Discharge of Conditions

Proposal : Discharge of condition 28 (water usage) relating to application 21/02832/FUL Demolition of three pairs of semi-detached houses and the erection of six storey buildings to provide 67 residential units, together with new access and closure of existing accesses, provision of disabled parking and cycle parking, refuse storage, landscaping and improvements to the public realm on Banstead Road.

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Date Decision: 10.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03752/TRE
Location : 28B Peaks Hill
Purley
CR8 3JF

Ward : Purley And Woodcote
Type: Consent for works to protected trees

Proposal : T1 - T2 Large Limes cut back from the roof of 26 peaks hill to give 2m clearance.
T3 - Leyandi tree reduce and shape the crown by 2 meters
T4 - Sycamore remove all deadwood
(TPO 132)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/02830/HSE
Location : 96 Beechwood Road
South Croydon
CR2 0AB

Ward : Sanderstead
Type: Householder Application

Proposal : Erection of single storey side extension and alterations.

Date Decision: 09.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03148/HSE
Location : 21 The Woodfields
South Croydon
CR2 0HG

Ward : Sanderstead
Type: Householder Application

Proposal : Conversion of garage to habitable room.

Date Decision: 07.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03539/LP
Location : 20 Cranleigh Gardens
South Croydon
CR2 9LD

Ward : **Sanderstead**
Type: LDC (Proposed) Operations
edged

Proposal : Erection of front porch

Date Decision: 09.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03562/LP
Location : 22 Hilton Way
South Croydon
CR2 9ER

Ward : **Sanderstead**
Type: LDC (Proposed) Operations
edged

Proposal : Erection of a hip to gable roof extension and rear dormer, including two rooflights to the front roofslope.

Date Decision: 09.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03597/HSE
Location : 20 Cranleigh Gardens
South Croydon
CR2 9LD

Ward : **Sanderstead**
Type: Householder Application

Proposal : Alterations; demolition of garage and erection of ground floor front, side and rear wraparound extension and first floor rear extension with associated changes to fenestration.

Date Decision: 09.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03673/TRE
Location : 29 Blacksmiths Hill
South Croydon
CR2 9AZ

Ward : **Sanderstead**
Type: Consent for works to protected
trees

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : T1 - Oak: Reduce by 2 metres away from Oaklands gutters.
G2 - 2x Oaks: Remove Epicormic Growth on Oaklands side.
G3 - Dead Oak and Elms: Fell to ground level. Cut and stack in woodland (EXEMPT WORKS)
(TPO 172)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/03758/TRE
Location : Land South West Of Limpsfield Road
South Croydon

Ward : Sanderstead
Type: Consent for works to protected trees

Proposal : All trees as per attached tree survey Schedule.
(TPO 47)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/04014/PDO
Location : O/S Goshawk Court
18 Rectory Park
South Croydon
CR2 9JN

Ward : Sanderstead
Type: Observations on permitted development

Proposal : Installation of fixed line broadband electronic communications apparatus consisting of 1no. x 9 metre above ground light carrier pole.

Date Decision: 09.11.23

No Objection

Level: Delegated Business Meeting

Ref. No. : 23/04061/PDO
Location : Communication Station
Borough Grange
8 Stanley Gardens
South Croydon
CR2 9AL

Ward : Sanderstead
Type: Observations on permitted development

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Addition of proposed 3no antennas (height to top 13.36m) and proposed 1no 300mmØ dish (height to C/L 10.5m). Ancillary development thereto to include the addition of proposed 6no ERS units

Date Decision: 07.11.23

No Objection

Level: Delegated Business Meeting

Ref. No. : 23/04073/PDO
Location : Telecommunication Mast
Mitchley Wood
Dunmail Drive
Purley
CR8 1EX

Ward : Sanderstead
Type: Observations on permitted development

Proposal : Removal of existing headframe to be replaced with proposed headframe c/w replacement 3no antennas (height to top 20.03m), relocated 4no antennas (height to top 20.03m) and relocated GPS module. Removal of existing 1no antenna (height to top 20.03m). Ancillary development thereto to include the relocation of existing 4no Remote Radio Units and existing 3no ERS units to new headframe, replacement of 6no ERS units, and the addition of proposed GPS module

Date Decision: 07.11.23

No Objection

Level: Delegated Business Meeting

Ref. No. : 22/04142/ADV
Location : Bus Shelter O/S 137 Addington Road
South Croydon
CR2 8LH

Ward : Selsdon And Addington Village
Type: Consent to display advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/03523/DISC

Ward : Selsdon And Addington

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 1 The Ruffetts
South Croydon
CR2 7LS

Type: **Village**
Discharge of Conditions

Proposal : Discharge of Condition 6 (landscape details) attached to planning permission 22/01376/FUL (Erection of a pair of two storey (plus loft) semi-detached dwellinghouses, with associated works)

Date Decision: 06.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03574/DISC

Ward : **Selsdon And Addington Village**

Location : 55 Crest Road
South Croydon
CR2 7JR

Type: Discharge of Conditions

Proposal : Discharge Condition 3 (Materials) attached to Planning Permission ref. 20/06710/FUL for 'Erection of a terrace of 4 two storey three bedroom houses with accommodation within the roof space at rear fronting Croham Valley Road, with associated refuse and cycle provision and landscaping'

Date Decision: 09.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03711/CAT

Ward : **Selsdon And Addington Village**

Location : 49 Addington Village Road
Croydon
CR0 5AS

Type: Works to Trees in a Conservation Area

Proposal : T1 Lime. I am wishing to make an amendment to a previously granted tree application (23/03201/CAT).
Reduce the tree height by 8 meters to bring the height below my gutters and my neighbours gutters.

Date Decision: 08.11.23

No objection (tree works in Con Areas)

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/03057/FUL

Ward : Selhurst

Location : Ye Olde Clocktower Public House
35 Whitehorse Road
Croydon
CR0 2JG

Type: Full planning permission

Proposal : Use of the site as a car wash on a temporary basis, with associated alterations

Date Decision: 03.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03124/LE

Ward : Selhurst

Location : 44 Princess Road
Croydon
CR0 2QZ

Type: LDC (Existing) Use edged

Proposal : Change of use from a dwelling house (Use Class C3a) to a residential home for up to 3 young adults living together as a single household receiving care (Use Class C3b)

Date Decision: 02.11.23

Lawful Dev. Cert. Granted (existing)

Level: Delegated Business Meeting

Ref. No. : 23/03600/GPDO

Ward : Selhurst

Location : 73 St Saviour's Road
Croydon
CR0 2XF

Type: Prior Appvl - Class A Larger House Extns

Proposal : Erection of single storey rear exxtensions projecting out a maximum of 5.5 metres from the original property with a maximum height of 3 metres

Date Decision: 09.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Hasil House
17 Orchard Avenue
Croydon
CR0 8UB
Type: Discharge of Conditions

Proposal : Details pursuant to Conditions 9 (carbon) and 15 (M4(3) compliance) of planning permission ref 19/00131/ful granted for demolition of existing detached house, erection of 3-storey building with further floor of accommodation in roofspace comprising 3 x 1 bedroom flat, 4 x 2-bedroom flats and 1 x 3 bedroom flat, formation of vehicular access and provision of 4 associated parking spaces and refuse storage

Date Decision: 03.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03466/HSE
Location : 24 Wickham Avenue
Croydon
CR0 8TY
Ward : Shirley North
Type: Householder Application

Proposal : Demolition of garage and ground floor side extension. Erection of single storey side extension and single storey side/rear extension.

Date Decision: 01.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03662/HSE
Location : 203 Longheath Gardens
Croydon
CR0 7TR
Ward : Shirley North
Type: Householder Application

Proposal : Erection of single-storey rear extension following demolition of existing conservatory.

Date Decision: 02.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03683/TRE
Ward : Shirley North

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 47 Firsby Avenue
Croydon
CR0 8TP

Type: Consent for works to protected trees

Proposal : T1 Ash - Fell due to severe decline
(TPO 09, 1968)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 22/02056/FUL

Location : 1 South Way
Croydon
CR0 8RH

Ward : **Shirley South**

Type: Full planning permission

Proposal : Erection of two-storey side extension and single-storey side / rear extension to facilitate the subdivision of the existing property into 2 x dwellings (Class C3), associated car parking, raised patio and including alterations (amended description).

Date Decision: 31.10.23

Permission Granted

Level: Planning Committee - Minor Applications

Ref. No. : 23/00009/FUL

Location : The Retreat
3 Oaks Lane
Croydon
CR0 5HP

Ward : **Shirley South**

Type: Full planning permission

Proposal : Conversion of single dwelling to 3 self-contained flats following erection of single storey rear extension, demolition of conservatory and rear extension and conversion of garage. Associated works including parking, amenity and landscaping.

Date Decision: 02.11.23

Permission Granted

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 129 Bynes Road
South Croydon
CR2 0PZ
Type: Householder Application

Proposal : Erection of cycle store to front of property

Date Decision: 06.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/01747/ADV
Location : 3 - 9 South End
Croydon
CR0 1BE
Ward : **South Croydon**
Type: Consent to display
advertisements

Proposal : Insallation of new illuminated fascia restaurant signage to street including projecting signage

Date Decision: 02.11.23

Consent Refused (Advertisement)

Level: Delegated Business Meeting

Ref. No. : 23/03551/LE
Location : 213 Brighton Road
South Croydon
CR2 6EJ
Ward : **South Croydon**
Type: LDC (Existing) Use edged

Proposal : Use as large HMO for 8 people

Date Decision: 09.11.23

Certificate Refused (Lawful Dev. Cert.)

Level: Delegated Business Meeting

Ref. No. : 23/03629/DISC
Location : 64 Selsdon Road
South Croydon
CR2 6PE
Ward : **South Croydon**
Type: Discharge of Conditions

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : Discharge of Condition 3 (CLP) attached to planning permission 19/03416/FUL for erection of a single storey lower ground front floor extension and three storey rear/side extension, alterations to the roof form and conversion to form 4 flats including associated waste and cycle storage, as well as rear communal area, landscaping and pedestrian accesses.

Date Decision: 02.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03705/DISC
Location : 172A Selsdon Road
South Croydon
CR2 6PJ

Ward : South Croydon
Type: Discharge of Conditions

Proposal : Discharge of Condition 3 (Construction Logistics Plan/Management Strategy) attached to PP 22/03921/FUL for the demolition of 3no. garages at the rear of Nos. 172A - 174A (facing on Helder Street) and erection of one two-storey 4-bed house, including associated works.

Date Decision: 06.11.23

Approved

Level: Delegated Business Meeting

Ref. No. : 23/03710/TRE
Location : Amenity Land
Campion Close
Croydon
CR0 5SN

Ward : South Croydon
Type: Consent for works to protected trees

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Proposal : T4 (73) Sycamore Tree - Cut back to boundary line
T5 (75) Sycamore Tree - Remove stem with trunk wound
T6 (79) Sycamore Tree - crown reduction by 2m
T9 (90) Dead Elm Tree - Fell leaving 5-6m habitat monolith
T10 (92.1) Sycamore Tree - crown reduce by 3m
T11 (136) Common Ash Tree - crown reduce by 4m end heavy lateral limbs
T12 (143) Common Ash Tree - crown reduce by 4m end heavy lateral limbs

Additional requested works for maintenance/preservation or due to building clearance/damage:

T13 (64) Sycamore Tree - Reduce side allowing 2m clearance from the building
T14 (68) Sycamore Tree - Reduce side allowing 2m clearance from the building
T15 (51) London Plane Tree - Crown lift by 1m
T16 (185) Maple Tree - Reduce by 2m
T17 (184) Maple Tree - Fell to ground level
T18 (199) Norway Maple Tree - Fell to ground level allowing more light to beds
T19 Copper Maple Tree - Crown lift by 0.5m
T20 & T21 (209 & 210) 2x Rowan Trees - Crown lift by 0.5m
T22 & T23 (218 & 219) 2x Rowan Trees - Crown lift by 0.5m
T24 Beech Tree - Fell to ground level as too close to the building
T25 (221) Stag Horn Sumach - Fell to ground level
T26 (117) Honey Locust Tree - Reduce from building allowing 2m clearance
T27 (123) Cherry Tree - Fell to ground level as too close to the building
T28 (216) - Fell to ground level due to damage to garage building
NOTE: ALL EXEMPT TREE WORKS HAVE BEEN REMOVED FROM PROPOSAL
(TPO 48, 1979)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/04158/LP

Ward : South Croydon

Location : 4 Rocklands Drive
South Croydon
CR2 0FE

Type: LDC (Proposed) Operations
edged

Proposal : Erection of a single storey detached outbuilding sited to the northern flank elevation of the existing dwelling.

Date Decision: 09.11.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03333/HSE
Location : 83 Lancaster Road
South Norwood
London
SE25 4BL

Ward : South Norwood
Type: Householder Application

Proposal : Alterations. Alteration of roof from hipped end to gable end. Erection of rear zinc dormer roof extension. Removal of one chimney. Partial demolition of existing garage and installation of timber cladding. Demolition of existing conservatory. Installation of one window and one cat flap to side elevation following removal of one door. Installation of aluminium framed glass sliding doors to rear elevation. Replacement of windows and doors. Replacement of garage door. Alteration to driveway.

Date Decision: 07.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03543/LP
Location : 19 Charnwood Road
South Norwood
London
SE25 6NT

Ward : South Norwood
Type: LDC (Proposed) Operations edged

Proposal : Change of use from a single family dwellinghouse (Use Class C3) to residential household for not more than six residents living together as a single household where care is provided for residents by a full-time resident carer (Use Class C3 (b))

Date Decision: 02.11.23

Certificate Refused (Lawful Dev. Cert.)

Level: Delegated Business Meeting

Ref. No. : 23/03639/GPDO
Location : 44 Sunny Bank
South Norwood
London
SE25 4TJ

Ward : South Norwood
Type: Prior Appvl - Class A Larger House Extns

Proposal : Erection of single storey rear extension projecting out 6 metres with a maximum height of 2.8 metres

Date Decision: 09.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 12 Norwich Road
Thornton Heath
CR7 8NA
Type: Full planning permission

Proposal : Conversion of dwelling house to one (1) x one (1) bed flat, one (1) x three (3) bed flat,
Erection of single storey rear/side extension (following demolition of existing), Installation
of cycle and bin storage, amenity space and associated alterations.

Date Decision: 02.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03501/HSE
Location : 37 Luna Road
Thornton Heath
CR7 8NZ
Ward : Thornton Heath
Type: Householder Application

Proposal : Erection of ground floor rear extension (following demolition of existing).

Date Decision: 10.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03542/FUL
Location : 70 Beulah Road
Thornton Heath
CR7 8JF
Ward : Thornton Heath
Type: Full planning permission

Proposal : Alterations, erection of ground and first floor rear/side extensions to provide 1x studio flat
and 1x 1-bedroom flat

Date Decision: 09.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 22/01172/ADV
Location : Underpass Duppas Hill Lane At Junction With
Southbridge Road, Croydon
CR0 4BE
Ward : Waddon
Type: Consent to display
advertisements

Proposal : Small format Advertising

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 22/01202/ADV
Location : Advertising Opposite 75 Old Town
Croydon
CR0 1AW

Ward : Waddon
Type: Consent to display
advertisements

Proposal : Small format Advertising

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 22/04166/ADV
Location : Bus Shelter O/S 55 Haling Park Road
South Croydon
CR2 6ND

Ward : Waddon
Type: Consent to display
advertisements

Proposal : Advertising as part of a new bus shelter

Date Decision: 10.11.23

Not Determined application

Level: Delegated Business Meeting

Ref. No. : 23/03184/HSE
Location : 31 Denning Avenue
Croydon
CR0 4DJ

Ward : Waddon
Type: Householder Application

Proposal : Erection of two-storey side/rear extension

Date Decision: 06.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03290/FUL

Ward : Waddon

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Managers Accommodation
The Wandle Arms
90 Waddon New Road
Croydon
CR0 4JB

Type: Full planning permission

Proposal : Conversion of store room in use by Pub (Use Class Sui Generis) and erection of a single storey extension to form a studio flat (Use Class C3) and associated amenity space, cycle parking and refuse store

Date Decision: 09.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03739/PDO

Location : Waddon And Brantwood Water Treatment Works
Waddon Way
Croydon
CR0 4HY

Ward : **Waddon**

Type: Observations on permitted development

Proposal : To install waste pipework and associated ancillary development.

Date Decision: 09.11.23

No Objection

Level: Delegated Business Meeting

Ref. No. : 23/03772/TRE

Location : Whitgift School
Nottingham Road
South Croydon
CR2 6YT

Ward : **Waddon**

Type: Consent for works to protected trees

Proposal : T259 - Mature Sycamore Tree: 2 metre crown reduction.
(T4 on TPO 10, 1998)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/03776/TRE

Ward : **Waddon**

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Whitgift School
Nottingham Road
South Croydon
CR2 6YT
Type: Consent for works to protected trees

Proposal : T276 - Middle Aged Common Beech: 2m crown reduction.
(T6 on TPO 20, 1995)

Date Decision: 08.11.23

Consent Granted (Tree App.)

Level: Delegated Business Meeting

Ref. No. : 23/00718/DISC
Location : 20-22 Portland Road
South Norwood
London
SE25 4PF
Ward : Woodside
Type: Discharge of Conditions

Proposal : Discharge of conditions 3 (materials), 5 (landscaping) and 7 (bin and cycle storage) from planning permission 22/04109/FUL for 'Demolition of the existing buildings on site and the erection of a new three storey building and a single storey building at the rear to contain a total of 6 flats, with commercial space on the ground floor facing Portland Road. Associated site alterations'

Date Decision: 02.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/02300/FUL
Location : 25B Crowther Road
South Norwood
London
SE25 5QP
Ward : Woodside
Type: Full planning permission

Proposal : Demolition of the existing ground floor rear projection and erection of a new two level house with a basement. Other associated site alterations.

Date Decision: 01.11.23

Permission Refused

Level: Delegated Business Meeting

Ref. No. : 23/03258/DISC
Ward : Woodside

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : Jack House
10B Portland Road
South Norwood
London
SE25 4FQ

Type: Discharge of Conditions

Proposal : Discharge of Conditions 5 (Green Roof Details) of planning permission ref 23/00561/FUL for "Erection of new doors and windows with Juliet balconies at ground and first floor level, erection of new green roof and alterations to external facade"

Date Decision: 03.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03330/DISC
Location : 16 - 18 Portland Road
South Norwood
London
SE25 4PF

Ward : **Woodside**
Type: Discharge of Conditions

Proposal : Discharge of Conditions 3 (Materials), 5 (Refuse Storage) and 7 (Waste Management Plan) of Planning Permission ref 22/03379/FUL for "Change of use of first and second floor of 16 Portland Road from ancillary commercial floorspace (Use Class E) to residential (use Class C3) to create 2no. self-contained flats with associated cycle and refuse storage. External alterations comprising replacement of front elevation windows of nos.16 and 18 Portland Road and replacement of existing concrete blocks with brick to rear elevation of no.16 (amended description)"

Date Decision: 03.11.23

Not approved

Level: Delegated Business Meeting

Ref. No. : 23/03386/FUL
Location : Moorbeck Court
74 Albert Road
South Norwood
London
SE25 4JW

Ward : **Woodside**
Type: Full planning permission

Proposal : Alterations to the existing block of flats on site to provide terrace and balcony areas, including to the roof. Erection of a new two storey terrace to contain 3no. homes toward the rear of the site. Provision of new car and cycle parking facilities and landscaping, with associated alterations.

Date Decision: 31.10.23

Permission Refused

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Level: Delegated Business Meeting

Ref. No. : 23/03510/GPDO
Location : 144 Portland Road
South Norwood
London
SE25 4PT

Ward : Woodside
Type: Prior Appvl - Class E to
(dwellings) C3

Proposal : Change of use of the ground floor of the building from commercial use (Use Class E) to residential use (Use Class C3) to provide 1 x 1-bedroom dwelling under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Date Decision: 02.11.23

Approved (prior approvals only)

Level: Delegated Business Meeting

Ref. No. : 23/01116/LP
Location : 129 Fairlands Avenue
Thornton Heath
CR7 6HJ

Ward : West Thornton
Type: LDC (Proposed) Operations
edged

Proposal : Erection of single storey rear extension. Erection of rear dormer, installation of three rooflights on front roofslope.

Date Decision: 30.10.23

Lawful Dev. Cert. Granted (proposed)

Level: Delegated Business Meeting

Ref. No. : 23/03411/LP
Location : 56 Broughton Road
Thornton Heath
CR7 6AL

Ward : West Thornton
Type: LDC (Proposed) Operations
edged

Proposal : Erection of single storey rear/side extension with side windows.

Date Decision: 07.11.23

Certificate Refused (Lawful Dev. Cert.)

Level: Delegated Business Meeting

Ref. No. : 23/03458/HSE

Ward : West Thornton

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Location : 20 Beddington Terrace
Mitcham Road
Croydon
CR0 3HG

Type: Householder Application

Proposal : Erection of side/rear single storey extension (following demolition of existing).

Date Decision: 02.11.23

Permission Granted

Level: Delegated Business Meeting

Ref. No. : 23/03637/GPDO

Location : 33 Fairlands Avenue
Thornton Heath
CR7 6HD

Ward : **West Thornton**

Type: Prior Appvl - Class A Larger
House Extns

Proposal : Erection of single storey rear extension projecting out 6 metres with a maximum height of 3 metres

Date Decision: 09.11.23

Prior Approval No Jurisdiction (GPDO)

Level: Delegated Business Meeting

Ref. No. : 23/03901/AUT

Location : 156-160 Beddington Lane Beddington Sutton
CR0 4TE
(Within London Borough Of Sutton)

Ward : **Out Of Borough**

Type: Consultation from Adjoining
Authority

Proposal : Variation of conditions 1 (approved plans), 3 (demolition management plan), 4 (construction management plan), 5 (protected species assessment), 7 (written scheme of investigation), 8 (tree protection report) and 32 (internal floor space) of planning permission ref: DM2022/01134 (as amended by NMA decision ref: DM2023/01376 dated 26/09/2023) which allowed the 'Demolition of all buildings on site and erection of 3 buildings creating 4 industrial units (Use Classes B2-general industrial, and/or B8-Storage or distribution, and/or E(g)iii-Industrial processes), with ancillary offices, provision of vehicle parking, cycle storage, landscaping, alterations to access and associated infrastructure' to allow for the provision of mezzanine floors to Units 3 and 4 along with variations to the wording of planning conditions 1, 3, 4, 5, 7, 8 and 32.
(Adjoining Borough Consultation Received)

Date Decision: 09.11.23

Comments on adjoining borough consultation

Decisions (Ward Order) since last Planning Control Meeting as at: 14th November 2023

Level: Delegated Business Meeting

Ref. No. : 23/03941/AUT

Ward : Out Of Borough

Location : Woodcote Park Golf Club
Meadow Hill
Coulsdon
CR5 2QQ

Type: Consultation from Adjoining
Authority

Proposal : Construction of a golf irrigation reservoir and installation of a 1.5m high fence. (Adjoining
Borough Consultation from London Borough of Sutton - Reference: DM2023/01512).

Date Decision: 09.11.23

Comments on adjoining borough consultation

Level: Delegated Business Meeting